



Local Plan Task Group
Wednesday, 5th August, 2020 at 11.00 am
in the Remote Meeting on Zoom and available for the
public to view on WestNorfolkBC on You Tube - Zoom
and You Tube

Reports marked to follow on the Agenda and/or Supplementary Documents

1. **Consultation Responses Parts 10 to 15 (Pages 2 - 503)**

Contact

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Draft Policy - Wisbech Fringes (inc. Walsoken)

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545131247420#section-s1545131247420>

Consideration of issues:

The main issues raised by consultees were:

- Additional areas to be included in the Walsoken development boundary;
- Clarification of the application of the development boundary;
- A suggestion of an allocation for an additional 450 houses at Black Bear Lane;
- A suggestion of an allocation for an additional 14 houses at Burrett Road;
- A suggestion of an allocation for an additional 16 houses at Burrettgate Road;
- Minor rewording re flood risk;
- A suggestion of an allocation for an additional 16 houses at Sparrowgate Road;
- A suggestion of an allocation for an employment/mixed use (H497) in the vicinity of Wisbech Port;
- Need to work with QE Hospital and West Norfolk CCG re hospital impacts;
- Suggested amended wording re the delivery of the Broad End Road new/upgraded junction and specify that this should be in the form of a roundabout as specified in the Wisbech Access Study;
- A suggestion of an 8.5 ha (6.3 ha net) extension to the East Wisbech allocation for around 170 houses;
- A suggestion that land at Elm High Road should be allocated for mixed use to include 200 houses and retail/business land;
- Some suggestions for changes to the Policy wording from Fenland Council to reflect the BCP more closely;
- Additional text to protect the heritage asset north west of the site.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

1) .

6. **Amend the wording of Policy F3.1 to refer to the agreement between FDC and BCKLWN on affordable housing provision (23%) – point 2j;**
7. **Amend the wording of Policy F3.1 to make it clear that CIL is not required for developments on sites within the BCKLWN BCP area but that S106 is to be the main vehicle for attracting the necessary infrastructure for this site;**
8. **Amend the wording of Policy F3.1 to emphasise that in bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils;**
9. **Include an additional criterion in Policy F3.1 to require that development should preserve the listed building and its setting.**

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Policy Recommendation:

Site Allocation

Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)

Land to the east of Wisbech (approximately 25.3 hectares), as shown on the Policies Map, is allocated for 550 dwellings

Development will be subject to:

1. Prior to the submission of a detailed planning application, the applicant should provide:
 - a. an ecological study that establishes either there would be no negative impact on flora and fauna; or if any negative impacts are identified, establishes that these could be suitably mitigated.
 - b. an archaeological assessment;
 - c. a landscape assessment to determine whether or not existing areas of mature orchards, could be retained and enhanced to serve as multi functional public open space areas with amenity and biodiversity value;
 - d. submission of a site specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding;
 - e. **a drainage strategy for the whole site;**
 - f. a Broad Concept Plan (BCP) for the wider development area (including the adjacent Fenland allocations) showing how the various considerations and requirements (including those below) can be integrated and delivered. This has been agreed jointly by both Fenland District Council and the Borough Council. **In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils.**
2. An application should show how it incorporates the provisions of the BCP into the application including the provision of:
 - g. the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity. Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. **This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study;**
 - h. local highway improvements to fully integrate the development into the surrounding network;
 - i. improved bus links to Wisbech town centre and associated infrastructure;
 - j. pedestrian and cycle ways within and beyond the site, including links to Wisbech town centre;
 - k. additional primary and secondary school places, including a new primary school on part of the jointly allocated area;

- l. strategic infrastructure for the wider area proportionate to the size of the development (CIL is not required for developments within the BCKLWN BCP area but S.106 is to be the main vehicle for providing the necessary infrastructure for the site);
- m. the provision of a site for a new local centre/community focus to serve the wider allocation, at the location determined in the BCP.
- n. protection and enhancement of public rights of way within the site;
- o. the preservation of the adjacent Grade II listed building and its setting (Austin House, 4 Burrett Gate Road, Walsoken) to the NE of the site;
- p. the provision of multi-functional open space throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for SuDS) for the whole area as set out in the approved BCP (or any successor);
- q. sustainable drainage systems to address surface-water run-off, flood risk, biodiversity and the avoidance of groundwater pollution and a drainage strategy for the site;
- r. provision of affordable housing in line with the agreement between KLWN and FDC (23%) current standards;
- s. the provision of a site (either within KLWN or FDC allocations) for a new local centre/community focus to serve the wider allocation, at a location to be determined in the masterplan.

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Sustainability Appraisal:

Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)

This policy is very similar, to the equivalent policy considered in the SADMP process and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

Policy F3.1 Wisbech Fringe – Land East of Wisbech (west of Burrettgate Road)																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
F3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
Draft 3.1	0	0	0	0	0	0	0	+	0	0	0	+	0	++	++	0	0	+	0	0	+7	0	Likely Positive Effect +7
No Policy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Likely Neutral Effect

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Maxey Grounds & Co	Object	<p>The paragraph deals with the area of Walsoken identified within the development boundary.</p> <p>There are significant areas on the east side of Burretgate Road, and the north and south sides of Broadend Road where there is concentrated development, including commercial areas in active use, where it is considered that these whilst being separated from the main core of the village, should also be identified as being within the development area. They will be linked to the main part of the village by the urban extension. There are one or two minor infill sites within the developed footprint that could appropriately come forward to round off the area, but which at present would not come within policy LP26 because they do not adjoin the development boundary.</p>	<p>Include in the development boundaries the areas marked in blue on the attached plan.</p>	<p>Disagree – it is not considered appropriate to include these areas as they currently detached from the built parts of the settlement.</p>
Nathan Rose	Object	<p>I've sought to understand the points made throughout this Local Plan Review, but it is very involved and complex for public consumption, in my view. It's hard therefore to be confident that the interests of local residents and the general public are catered for in at least equal measure with the views of developers who are naturally seeking to maximise revenue and profit, as business does. I hope part of the role of local planning is to balance these requirements.</p> <p>Can you help me with this by way of a specific example? The development boundary along Black Bear Lane and Burrett Road seems very clear. However, if applications were made for residential developments in the land north of Black Bear Lane (site refs 408/271 in previous documents) or east of Burrett Road (site</p>	<p>Changes needed as I have suggested elsewhere to improve confidence for residents and the public in the meaning, strength and value of development boundaries and associated planning policies.</p>	<p>Disagree – these would be matters to be judged against the policy should applications come forward for consideration.</p>

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		refs 406/272 in previous documents) or north-east of the crossroads, would these be turned down under this Local Plan Review on the basis of a) they are outside the development boundary as per Policy LP04 b) they would obscure the "views in/out of the locality" therefore contravene point 1d of Policy LP26?		
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner.</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district.</p> <p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.' It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn</p>	Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>and West Norfolk and that the proximity to Wisbech makes this location highly sustainable.</p> <p>This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims. The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>‘Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner</p> <p>We do object to the line of the development boundary as it relates to and excludes land to the east of Burrett Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H452.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site’s relationship to Wisbech makes it one of the most</p>	Amend the development boundary of Walsoken to incorporate land at Burrett Road (HELAA 452) as a housing allocation for up to 14 homes.	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>sustainable and accessible locations in the district.</p> <p>It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.'</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King's Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 14 homes.</p>		
Peter Humphrey	Object	<p>Strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward.</p> <p>We do object to the line of the development boundary as it relates</p>	Amend the development boundary of Walsoken to incorporate land east of	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>to and excludes land to the east of Burretgate Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP are which is progressing towards submission of a planning application this year.</p> <p>Given the extent to the land identified as part of the Wisbech East development in both King's Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	<p>Burretgate Road (HELAA 451) as a housing allocation for up to 16 homes.</p>	
Environment Agency	Object	<p>10.5.7 - ...the village is constrained and this is in the low to medium risk (category 2). Wording should refer to Flood Zones throughout for consistency and clarity.</p>	<p>Reword to: Only a small part of the built area of the village is constrained by flood</p>	<p>Agree - amend wording of 10.5.7 as suggested.</p>

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			risk, with this are being at medium risk of flooding (Flood Zone 2).	
Peter Humphrey	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the east of Sparrowgate Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H451.</p> <p>The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year. Given the extent to the land identified as part of the Wisbech East development in both Kings Lynn and West Norfolk and Fenland it seems unnecessary to draw the development boundary so close in to Walsoken to prevent and additional development adjacent to the allocation; clearly the character of the area will change (to become more urbanised) and enhanced access and services will be introduced as part of the BCP area. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and close to the main bus route to Wisbech which will go through the BCP area it is considered having regard to the character of the area that the site could deliver up to 16 homes.</p>	Amend the development boundary of Walsoken to incorporate land east of Sparrowgate Road (HELAA 451) as a housing allocation for up to 16 homes.	Disagree – there is no need for further allocations to be made in the plan review period.
Mr Kooreman (Peter Humphrey)	Object	The employment strategy as explained in the Employment Land Review 2017 acknowledges that land allocation in the previous plan has not come forward at the rate expected - as set out below. Page 11-	Amend development boundary for Wisbech fringe to include all or part of the site	Disagree – there is no need for further allocations to be made in the plan review period.

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		<p>Therefore, of 68.5 ha, currently just 1.8 ha have been completed, 28 ha have planning permission and 39.2 ha do not have permission yet. In comparison to completions of the previous years, the current available employment land within the SADMP allocations present a supply of employment land for 19.6 years. Whilst there is a theoretical supply of employment land it may well be the case that this is not being taken up through being in the wrong location for business or that it is constrained in other ways. It is noted that notwithstanding Wisbech being a significant town for the southern part of West Norfolk providing many services and facilities -as well as employment opportunities – there are no employment allocations made adjacent to the town within KLWN BC. This is not considered to be balanced planning given the clear sustainability benefits that Wisbech has as an employment location.</p> <p>The land being promoted all (or part) of H497 is available for employment or mixed-use development within the plan period and offers the only large scale opportunity to expand Wisbech port which could offer significant employment and economic opportunities for the area within the plan period.</p> <p>It may be the case that the expansion does not require all of the land and my client is happy to discuss the level of need with officers within the plan preparation process.</p> <p>It is acknowledged that this is a longer-term option however it is the only land that could accommodate an expansion and given the plan period this could come forward in the latter stages of the plan.</p> <p>It is noted that H497 was rejected from the HELAA assessment because it was more than 25m from the development boundary and as such was not properly considered within HELAA or the site</p>	<p>identified in the HELAA as H497 as being suitable for employment land and as an extension to Wisbech port.</p>	

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		assessment sustainability assessment. It is considered that such a significant strategic site should be reconsidered within the plan preparation process to ensure that the council has fully acknowledged the unique opportunities that this large employment site adjacent to the river can bring.		
STP Estates Group	Comment	10.5.1 Under the East Wisbech Broad Concept Plan (2018) Community Facilities there is a comment that an expansion of health facilities will be required, especially when the total scale of development in Wisbech is taken into account. The majority of health facilities in Wisbech are covered by Cambridgeshire and Peterborough STP and therefore the Norfolk and Waveney STP estates group is unable to comment on these. However the Queen Elizabeth Hospital King's Lynn covers the Wisbech area and the impact on the hospital from significant large scale growth in Wisbech would be considerable. The Borough Council would therefore need to work with the Queen Elizabeth Hospital King's Lynn and West Norfolk Clinical Commissioning Group as the Wisbech project gathers pace to ensure that any available mitigation is sought from developers but also to ensure that the hospital is given the time required to respond to an increase in the population it serves.		Noted.
Nathan Rose	Object	Whilst it is good to see that the improvements to Broad End road / A47 junction are a requirement of the development of the site, I would like to see these requirements made more clearly and strongly even at this early stage. When the site that my home is part of was developed here in Walsoken, the developer was allowed to move on to new developments before meeting the planning requirements of this site. I don't blame the developer for doing this; developers are running businesses, not setting policy. However I feel the planning committee should have been stronger	Change this phrase "Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery	Disagree – it would be inappropriate to include this form of restrictive wording in the policy as the junction can only be provided by a third party and is not in the control of the developer.

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		<p>in ensuring the requirements were met in an appropriate timescale rather than the drawn-out process which meant the roadways were not completed until months/years after they should have been. With 550 homes going into Walsoken, it would be seriously detrimental to the village, and road safety, if developers are allowed to commit to improving the junction, but then it becomes something that gets done well after the majority or all of the homes have been developed and inhabited. I appreciate a developer may argue that they need the revenue stream from sales of the homes to fund the road improvements, but this should not be acceptable if there is any way it would mean massively increased traffic through the junction, even for a few months, before the improvements are in place.</p>	<p>scheme for the allocation;" to something like "Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. It will be mandated that the new/upgraded junction is to be completed before commencement of development of the homes / before 25% / 50% / 75% of the homes are inhabited."</p>	
Nathan Rose	Object	<p>Section 10.5.1.20 under "Wisbech Access Study" specifically states that the improved junction at the Broadend Road / A47 junction will be "a new A47/Broadend Road Roundabout" and that this is part of "The short term package, for construction by Spring 2021". I'm aware, from a public meeting I attended a few years back at Walsoken Village Hall, that a new roundabout may be the most complex and costly improvement option from an engineering perspective. The content about this junction in Policy F3.1 is much less specific.</p>	<p>Change 2a in Policy F3.1 to be consistent with Section 10.5.1.20, as follows: "the proposed access(es) to serve the development ensuring that there is no unacceptably net adverse impact on the</p>	<p>Agree – make reference to the roundabout in the policy.</p>

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		<p>Shouldn't it be consistent with the statements above? As it stands, it appears to allow for suggestions of alternatives to a new roundabout, perhaps cheaper and therefore less safe, and that the timescale is to be decided with developers.</p> <p>I've suggested new wording to cover this.</p> <p>Alternatively, if I have misunderstood the statement at 10.5.1.20, then this needs to be clearer. I can't offer alternative wording if this is the change required, as by definition I'm not sure what else it is trying to say.</p>	<p>local and strategic highway network and on existing residential amenity. Access towards the A47 will be via a new/upgraded junction, with the arrangements for delivering such upgrade being agreed as part of the comprehensive delivery scheme for the allocation. This must include a new A47/Broadend Road Roundabout, as required by the Wisbech Access Study, for construction by Spring 2021;"</p>	
Peter Humphrey	Object	<p>The Wisbech East sustainable urban expansion is a large allocation on the east of the town of Wisbech. It crosses the border between Norfolk and Cambridgeshire and incorporates housing allocations within the existing local plans for both King's Lynn and West Norfolk and Fenland councils.</p> <p>In 2018 the Broad Concept Plan (BCP) was approved / adopted by both councils and in January 2019 the EIA scoping opinion was submitted to the council for consideration. Land assembly is ongoing with the respective landowners and it is intended to work towards the submission of an outline planning application for the</p>	<p>Amend the housing allocations for Wisbech Fringe to incorporate the land in H099 (as illustrated on the attached plans) as an extension to the adopted BCP with an anticipated commencement in</p>	<p>Disagree – there is no need for further allocations to be made in the plan review period.</p>

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		<p>entire BCP during 2019.</p> <p>The BCP incorporates an illustrative concept plan showing the relative positions of the land uses and possible transportation linkages through the site.</p> <p>My client owns part of the BCP area to the south of the old railway line and to the west of Meadowgate School and this is land (which lies within Fenland) is being promoted with in the BCP and forthcoming outline submission. Edged blue on the attached plan.</p> <p>In addition to the above plan my client also owns land edged on the plan (which does lie within KLWN), which is previously developed land formerly part of the College of West Anglia. In total the site is 8.3 ha in size however there are areas of woodland within it that would reduce the net developable area to approx. 6.3 ha.</p> <p>The site could also offer additional screening to the south of the BCP area from the A47.</p> <p>The site was put forward as part of the HELAA (ref H099), it is noted that it scored highly in terms of sustainability and deliverability, but was rejected on the advice of NCC highways concerns that a suitable highway access is not available. Now that it can be clarified how that access can be provided it is requested that the site be incorporated as an addition to the BCP which is acknowledged in both the KLWN and Fenland local plans as being a highly sustainable and accessible location for new growth and as previously developed land there is additional emphasis is securing best use.</p> <p>The HELAA confirms that there are no other material impediments to the sites development and as such it represents a logical and sustainable addition to the BCP.</p> <p>The landowner has an agreement with the promoter of the BCP</p>	<p>approx. 10 years which should be reflected in the accompanying policy and trajectory.</p>	

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		<p>that an access can be made available from the southern part of the BCP, through or around the poplar woodland to the site. Modelling for capacities in the forthcoming BCP outline submission will take the potential additional capacities from the site into account. See BCP plan with indicative road links through to the site, utilising a natural edge to the poplar woodland with the scrub beyond and looping around the woodland adjacent to Meadowgate Lane. Clearly this is contingent upon the BCP achieving the necessary planning permission and implementation for the roads and infrastructure to access and service the site – however given the length of the plan period (up to 2036) it should be included as an allocation albeit one that is not expected to come forward in the next 10 years as it will take several years to secure permission, undertake the infrastructure works and build out the BCP to a point where the necessary highway links are in place. Using the site area to density calculator formula as set out in the HELAA an indicative no of 170 homes is achievable from the site.</p>		
Environment Agency	Object	Map included is of poor resolution so it is not possible to determine location/layout of the site.	Provide an additional map with clearer resolution.	Agree – include improved map at next stage.
Mr Goodale (Peter Humphrey)	Object	<p>My client is generally supportive of the development strategy for Walsoken reflecting the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward in a sustainable manner. We do object to the line of the development boundary as it relates to and excludes land to the east of Black Bear Lane Road and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H453. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement</p>	Amend the development boundary of Walsoken to incorporate land at Black Bear Lane (HELAA 453) as a housing allocation for up to 450 homes over the plan period.	Disagree – there is no need for further allocations to be made in the plan review period.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation.</p> <p>The site is well related to the town of Wisbech and to the allocated Wisbech East BCP area which is progressing towards submission of a planning application this year.</p> <p>The site's relationship to Wisbech makes it one of the most sustainable and accessible locations in the district. It is noted that the HELAA assessment identified no fundamental constraints to development and concluded that 'Based on current evidence the site appears suitable.'</p> <p>It is of course accepted that the site is large and it is not necessary for all of the potential 450 homes (that the site could accommodate) to come forward at this time, however given the duration of the local plan period it is clear that there will be a need for significant growth within Kings Lynn and West Norfolk and that the proximity to Wisbech makes this location highly sustainable. This being the case it is clear that the site can come forward within the plan period without harm to local amenity or strategic planning aims.</p> <p>The site could come forward as a whole later in the plan period, or it could be allocated in phases – coordinated by a masterplan. It is clear that the site relates well to the north eastern side of Wisbech and has good access to the A47 and Lynn Road.</p> <p>'Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and it is considered having regard to the character of the area that the site could deliver up to 450 homes over the plan period.</p>		
Mr Goodale (Peter)	Object	My client is supportive of the general approach to allocation on	Amend the	Disagree – there is no need

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
Humphrey)		<p>housing in Walsoken - acknowledging its sustainability and accessibility in relation to Wisbech which is a main town (albeit not in KLWN) which offers a significant range of higher order services and facilities.</p> <p>It is noted that the site is adjacent to the allocation of up to 1730 Homes on land within what is referred to as the Wisbech East Broad Concept Plan Area (BCP) the KLWN part of which remains an allocation under F3.1.</p> <p>This area is clearly regarded as being sustainable and accessible in planning terms.</p> <p>The BCP area planning is gathering pace with the BCP itself being adopted by both Kings Lynn and West Norfolk Council and Fenland District Council last year, and land assembly is on-going and the EIA scoping opinion was submitted to the councils in January 2019. It is anticipated that a planning application will be lodged within 2019.</p> <p>It is noted that the HELAA (H451) rejected the site only in relation to local highway network capacity. It is clear that in association with the BCP this will be significantly improved such that the allocation of the above site for upto 16 homes would be able to be accommodated in highway terms (it being approx. 1% of the allocation No). It is not considered that the density calculation in the HELAA is realistic and the development form as proposed in 16/00179/OM is more in keeping with a softer edge to the settlement.</p> <p>A planning application 16/00179/OM was refused in 2016 solely on rural protection grounds i.e. development the open countryside – the being no material constraints to the development of the site other than the its position outside of the development boundary.</p> <p>Given the impending development of the BCP area and the change in the character of the site at that point it is requested that the site</p>	<p>development boundary for Walsoken to incorporate the site (H451) and make an allocation to come forward in the 5-10 year timeframe within the plan.</p>	<p>for further allocations to be made in the plan review period.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>be incorporated into the development boundary and that it be allocated.</p> <p>It is accepted that this is not immediately available for development (as it is reliant on the initial highway infrastructure for the BCP) however it is likely to come forward in the 5-10 year time slot once the main highways are in.</p> <p>Given that the plan has a timeframe of up to 2036 it is considered appropriate to make provision for sites not immediately available provided that they have a reasonable prospect of coming forward - this clearly does have a good prospect.</p>		
Elmside	Object	<p>Policy F3.1 allocates land for 550 dwellings (25.3 hectares) as shown on the Policies Map subject to a number of identified constraints. Part of the site has the benefit of a planning permission for 117 dwellings, planning reference 14/01714/OM dated the 4th March 2016 where it is considered that, in any event, the settlement boundary should be amended to include the consented site area within the urban area.</p> <p>2 ALTERNATIVE SITES (F3.1)</p> <p>2.1 In terms of land at Elm High Road, it is considered this should be included in the Local Plan as a mixed use allocation to potentially extend the existing retail/business park on Elm High Road, the following are relevant:</p> <ul style="list-style-type: none"> ☑ The site is available and is under the control of one party. ☑ The site has developer interest meeting the requirements of the Framework. ☑ There are not any technical reasons why this site should not be deliverable (highways, drainage, ecology etc). ☑ The site will be relatively easy to develop in comparison to other sites, ie. proposed allocation F3.1 which is totally dependent upon other development being implemented by the eastern expansion 	<p>It is considered by Elmside for the reasons outlined by this statement and previous submissions that the land at Elm High Road for a mixed use allocation to include 200 dwellings and retail/business land uses should be allocated in the Local Plan. The alternative sites such as F3.1 proposed by the Plan are not considered to be deliverable, certainly during the early part of the Plan or in terms of sustainability or</p>	<p>Disagree – consented sites are not included within the development boundary until they are built. The existing allocation was established through the local plan process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>of Wisbech.</p> <p>☐ The site benefits from good access to infrastructure and is a desirable location for development affording good access to transport links and other facilities. The site is being promoted for an allocation for up to 200 dwellings with the access to the site via Hunters Rowe.</p> <p>2.2 It is submitted that in summary form, the circumstances that justify the redrawing of the settlement boundary to enable mixed use development of some 200 dwellings and also retail/business to be further delivered at Elm High Road are as follows:</p> <p>1) The site, in part, has the benefit of a planning permission for 117 dwellings which, in any event, the settlement boundary should include the site.</p> <p>2) The most sustainable and deliverable direction of growth for an urban extension is to the south east</p> <p>3) The site is outside the flood plain.</p> <p>4) It is considered that the site enables the redefinition of the settlement boundary that will endure for the long term and create a new defensible boundary.</p> <p>5) The site is located on existing public transport routes and there remains the opportunity to enhance linkages which will further improve the sustainability credentials of the site.</p> <p>6) With the site, in part, having the benefit of a planning permission for 117 dwellings (for which reserved matters has been granted) the site is clearly a sustainable location for development. The further development can use the existing roads and services (to connect to) which contributes to sustainability.</p>	<p>constraints, preferable to Elm High Road in planning terms.</p>	
Elmside	Object	<p>11. With regard to Policy F3.1 – Wisbech Fringe, it is submitted that this allocation proposed essentially as an extension to the east Wisbech allocation (Fenland District Council for in the region of</p>		<p>Disagree – the existing allocation was established through the local plan</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
		<p>1,000 homes), it is submitted that there are more sustainable alternatives with regard to addressing housing need in the Wisbech fringe.</p> <p>12. The proposals for the “Wisbech Garden Town” set out at paragraph 10.5.1.10 are supported and clearly further confirm the highly sustainable nature of the settlement, that policy F3.1 is clearly inadequate in identifying the needs of Wisbech.</p>		<p>process as the most sustainable option and a Broad Concept Plan (BCP) has been prepared jointly with Fenland Council to assist in bringing it forward.</p>
Fenland	Object	<p>FDC is also supportive of Policy F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road). The inclusion of the approved Main Diagram of the BCP is welcomed as well as supporting text in the policy to enable its delivery.</p>	<p>Whilst no objections are raised to the policy wording of F3.1 it may be helpful to consider the following:</p> <ul style="list-style-type: none"> - Highlight that multi-functional open space is to be provided throughout the site with open space standards jointly agreed with Fenland through the BCP process. Planning applications will need to be mindful of the wider open space requirements (including for Suds) for the whole area as set out in the approved BCP (or any successor). - A drainage strategy for the whole site is also 	<p>Agree – include these suggested changes to the policy wording to more closely reflect the Broad Concept Plan requirements.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			<p>key to bringing forward comprehensive development and could be highlighted in the policy (part of 2i?)</p> <ul style="list-style-type: none"> - Similarly there was agreement between FDC and BCKLWN on affordable housing provision (23%) – point 2j could be made clearer. - It is also understood that CIL was not to be required for developments on sites within the BCKLWN BCP area but that S106 was to be the main vehicle for attracting the necessary infrastructure for this site. - In bringing the site forward through planning applications there will need to be significant and early on-going co-operation between the two councils and this point 	

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/Proposed Action
			could be emphasized. The supporting text referring to potential wider Wisbech proposals e.g. A47 upgrade, garden town, rail link etc. is also welcomed and as this is constantly evolving would need to be brought up-to-date in future versions of the plan.	
Historic England	Object	Object - Whilst there are no designated heritage assets within the site, there is a grade II listed building to the north west of the site. Development of this site has the potential to impact upon the setting of this listed building. There is currently no reference to this nearby heritage asset within the policy. We suggest that the policy is amended to include a criterion for the protection of the setting of the heritage asset.	Include an additional criterion to read, 'Development should preserve the listed building and its setting'.	Agree - amend the wording as suggested.

Draft Policy – LP35 Downham Market

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759457#section-s1542882759457>

&

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759458#section-s1542882759458>

Consideration of Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

- Make the link between the Local Plan review and Neighbourhood Plan clear
- Allocate further land to aid regeneration of the town
- Tidy up wording with regard to the historic environment, as per Historic England’s advice
- Further sites supported for allocation
- One resident has a rather pessimistic view of the town

Conclusion:

- **The link between the Local Plan review and Neighbourhood Plan to be made clear and support highlighted, this will act as ‘hook’ for the NP.**
- **State the levels of growth**
- **Further allocations of land for housing, employment / mixed use will be for the Neighbourhood Plan to consider, taking into account the ‘basic conditions’**
- **Replace the word ‘respect’ with ‘conserve’, as per Historic England’s advice. And general tidying of the wording for consistency.**
- **Reference older people in the policy**
- **Change the word centre for destination as this makes more sense**

Suggested Policy:

Policy LP35 Downham Market

1. Focus in the town centre will be on:
 - a. enhancing a strong convenience and service offer;
 - b. strengthening the night time economy by accommodating a balanced diversity of uses;
 - c. facilities and services which support the town's full demographic profile including young professionals, families and older people will be encouraged;
 - d. improving the arts and culture offer;
 - e. promoting the town's role as a wider visitor centre destination.
2. Seek to improve the pedestrian, cycling and public transport links throughout the urban area to enhance accessibility and connectivity throughout the settlement and in particular to the town centre and the railway station.
3. Seek to enhance green infrastructure in accordance with the Green Infrastructure Strategy. Maintain landscape and the quality of open space.
4. Seek to respect conserve and enhance the built, historic and natural environment in the town.
5. The growth of Downham Market will be supported through the provision of land for housing for at least 390 new homes across two allocations and employment through the provision of an allocation for at least 15ha for a balanced mix of employment uses, and through the development of services and facilities. This growth will be carefully balanced to meet the needs of the existing and future population.
6. The Borough Council will support Downham Market Town Council and local community in the preparation of their Neighbourhood Plan, and subsequent reviews.

Sustainability Appraisal

LP35: Downham Market																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP35	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	+	+	++	+22	-7	Likely Positive Effect +15
Draft LP35	-	+/-	+/-	+/-	+	+	+	+/-	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
CS04	-	+/-	+/-	+/-	+	+	+	+	+/-	O	+	+	+	++	++	+	+	O	+	++	+20	-7	Likely Positive Effect +13
No Policy	-	+/-	+/-	+/-	+/-	+	+	O	+/-	O	+	+	+	+	+	+	+	O	+	+	+16	-7	Likely Positive Effect +9

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The proposed changes to the policy provide clarity and further detail but they do not alter the overall thrust of the policy. According the Sustainability Appraisal scoring remains the same between the draft policy and the proposed one except for objective 18 which now scores ‘++’ instead of ‘O’; this because Downham Market are in the process of preparing their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr J Maxey Maxey Grounds & Co	Suggests	<p>In suggesting the delegation to Parish Councils which have or are preparing Neighbourhood Plans there is considered to be significant risk. Most Parishes adopting such plans are doing so from a perspective of protecting the area rather than enabling development or fulfilling the presumption in favour of development. It is for the Borough Council to set the Strategy for development, including the appropriate scale for each settlement to accord with that strategy, and whilst local representatives are very important consultees in that process, their influence must be in the context of compliance with the strategic intentions of the plan. To this end it is considered that there should be a clear statement at the start of each settlement section confirming the status of the settlement (eg Main Town KRSC Smaller village or whatever is the designation) and a scale of growth considered appropriate for that settlement. This is s starting point then for consideration of the specific allocations for that village alongside an assessment of the windfall capacity. It also provides a basis for in future assessing the proposals in a Neighbourhood Plan, if the last element ie determination of allocation, is to be delegated. I would prefer an approach as has been put forward in non NP villages, where the Borough Council determines allocations after consultation with both the PC and the public. I have less faith than the Borough Council that local politics at parish scale will lead to selection of the best sites on a basis driven by Planning Policy. At Parish scale there is too much scope for conflicts of interest to interfere with the process, both for and against specific sites. However if this is a course that is found to be sound, then a clear</p>	Make it clear if a neighbourhood plan is being prepared/made.	<p>Agree with suggested modification but not the risks. Neighbourhood Plans were first introduced by the Localism Act (2011). It is the Government who says that Qualifying Bodies (Town/Parish Councils and Forums) have these planning capabilities. The Local Plan review does state if such a plan is being prepared/made. The basic conditions are clear that a neighbourhood plan needs to be consistent with national policy and the strategic policies of the Local Plan. The approach has been to assess the level growth required and provide communities preparing a neighbourhood plan with indicative figures to work to for housing allocation purposes.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		determination of scale will allow that scale to be debated at Borough level, and subsequent decisions to be judged against that scale on a local basis		
Richard Brown Elmside Limited	Support	With regard to Policy LP35 – Downham Market, it is submitted that the Local Plan identifies significant growth for Downham Market, to include infrastructure and services and facilities and that such issues can only be addressed by a significant urban extension to the south east sector		Support Noted. The site is allocated and benefits from outline planning permission. Delivery of the site is key.
Richard Brown Koto Limited	Object	Policy LP35 – Downham Market should include provision for a significant mixed use urban extension in the south east sector. The Local Plan should include strategic policies to address the identified needs of the town and to redress the “years of under-investment” and the “regeneration of the economy”.	Allocate further land proposed for housing and mixed uses	Noted. There is site allocated in this vicinity, in the same ownership, which benefits from outline planning permission for 300 homes. It would be great if this development did indeed progress and was ultimately built out. Downham Market Town Council are in the process of preparing a Neighbourhood Plan and many of the planning decisions/directions will be for them to decide such as the location of any future growth (if required). The housing numbers will be reviewed.
Mr N Darby	Support	Support		Support Noted
Mr J Maxey	Objects	There is no stated scale of growth for Downham Market within the settlement chapter. LP01 implies 710 with 320 of these to be	State the specific allocation scale within	Modify policy to include growth numbers. NPPF

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		allocated in the Neighbourhood plan. This is contrary to NPPF 2019 para 20 which states that strategic policies should make provision for housing. Delegating such allocation to a neighbourhood Plan is contrary to NPPF.	this paragraph and identify where strategically the 320 additional allocation should be	para 20. Says that ' <i>Strategic policies should set out an overall strategy for the pattern scale and quality of development...</i> ' This is what the Local Plan review does. However, this could be included within the policy. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed in the relevant section of the Local Plan review.
Debbie Mack Historic England	Object	Object - We welcome the reference to the built and historic environment at criterion 3 of this policy. We suggest replacing the word respect with conserve, more in line with the terminology of the NPPF.	Replace the word 'respect' with 'conserve'.	Noted, Agreed, make the Modification suggested
Debbie Mack Historic England	Support	Support - We very much welcome the reference to heritage assets and local building materials		Support Noted & Agreed
Strutt & Parker on behalf of the Pratt Estates, Trustees of Ryston Estate	Object	Resubmission I am writing on behalf of our clients, The Trustees of the Ryston 1984 Trust, who have instructed Strutt & Parker to make representations to King's Lynn & West Norfolk Borough Council's Draft Local Plan Review 2019. Our clients engaged in the Call for Sites consultation in 2016 by submitting a site in Downham Market, which is the land on the North West of the A10, which is	Make provision for more housing at Downham Market. Chiefly the allocation of the site proposed by and owned by the	Noted. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		approximately 21.27 hectares in size (Call for Sites ref: 28- 11- 20164288). The site has the potential to accommodate around 500 new homes which would make a significant contribution to local housing supply at a highly sustainable location. Please accept this letter as our supporting statement to justify, at this stage, the allocation of the site for residential development within the emerging Local Plan Review and proposed modification to the relevant draft policies. I have also attached a red line plan of the site. To accompany this supporting statement, I have included an Access Appraisal by TPA which assesses the options for providing access to the site. This appraisal has already been reviewed and commented on by officers including the County Highway Authority in a pre-application response letter dated 24 November 2017. The Highway Authority preferred the access option in figure 4.2, which was for the redevelopment of the existing roundabout on the A10/A1122.	Ryston Estate	decide. Housing numbers will be reviewed in the relevant section of the Local Plan review.
Mr R Riches & Barker Bros. Builders Ltd	Object	HEELA Ref H082 Site No: 560 The site edged red on the attached plan is some 2.69ha, and is surrounded by existing housing, and the town cemetery, and is close to the town centre, and its development can provide some 50 dwellings at low density together with open space. See attached document for more details	Allocate the site they have proposed	Noted. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed within the relevant section of the Local Plan review.
Mr Kelvin Loveday	mixed	Para. 10.2.3 - This paragraph 'sugar coats' Downham's situation.	There are a range of local employment opportunities that struggle to meet the needs of the town	Noted. The employment allocation within The Local Plan is close to this area. Proposals for the use of other land near here and

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			which consequently has become a 'dormitory' town. The town's historic industrial and trading links based on the River Great Ouse and the Relief Channel have declined. Now these watercourses support very limited leisure uses. This represents a huge, untapped opportunity for local commerce and employment.	uses on the River can be proposed.
Mr Kelvin Loveday	Objects	Para. 10.2.2 - A limited bus service links the town to its hinterland	A limited bus service links the town to its hinterland	Noted. This matter for NCC as the Local Highway Authority.
Mr Kelvin Loveday	Objects	Para. 10.2.1 - This paragraph 'sugarcoats' the town. Downham has grown disproportionately in recent years. The town has a range of services that now struggles to meet the needs of the local population. This deficit was highlighted by hundreds of responses to the Preferred Options consultation in 2013. Increasingly the local residents and surrounding rural communities look to other towns to meet their needs. Many local school pupils travel away from the town for their education. The town centre has reached its capacity to absorb traffic	Downham has grown disproportionately in recent years. The town has a range of services that now struggles to meet the needs of the local population. This deficit was highlighted by hundreds of responses to the Preferred Options consultation in 2013. Increasingly the local	Noted. Downham Market is one of the most sustainable locations within the Borough. Many of the issues raised are ones faced by many locations across the county and are not unique to Downham Market. There are a range of factors which have contributed towards this, including the rise of online shopping to

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>residents and the surrounding rural communities look to other towns to meet their needs. Many local school pupils travel away from the town for their education. Home education figures for the area are sky rocketing. The town centre has reached its capacity to absorb traffic. Health care services are overstretched.</p>	<p>financial / political uncertainty. The current planning system advocated by Government revolves around the provision of housing and associated infrastructure. Educational and Highways matters are for NCC to consider and indeed they are, including through their ongoing Market Town work stream. Health Care is a key issue and one which currently being considered by a range of health care providers through their transformational plans.</p>

Draft Policy – F1.1- Downham Market Town Centre & Retailing

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1544799996225#section-s1544799996225>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Object	Object - We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Downham Market within the policy as in paragraphs 10.2.4 and 5. This point applies to other similar policies throughout the plan and should be applied to those scenarios too	Make more detailed reference to the specific character and vernacular of Downham Market within the policy.	Noted. Downham Market Town Council and local community are preparing a neighbourhood plan for their area. It would be entirely appropriate for such detail to come forward through the neighbourhood plan. It should be noted that any planning permission will need to consider the historic environment including the conservation area, listed buildings and their setting(s) for example.

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Suggested Policy:

- As per the draft

Draft Policy – F1.2 - Downham Market Land off St. John’s Way Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1544800633247#section-s1544800633247>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Object	Object - Whilst there are no designated heritage assets within this site, the Downham Market Conservation Area lies to the north east of the site and includes a number of grade II listed buildings at the western end of the conservation area, . Any development of this site has the potential to affect the setting of the conservation area. To that end, we suggest the inclusion of a criterion in the policy to conserve and where appropriate enhance heritage assets and their settings.	Include additional criterion Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings	Noted & Agreed
Elizabeth Mugova Environment Agency	Suggests	10.2.2.4 states that the proposed development type (less vulnerable) is compatible with the flood risk classification	Whilst this is correct, an FRA is still required for the development and this should be specified here	Noted & Agreed

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Suggested Policy:

Policy F1.2 - Land off St. John's Way, Downham Market

Land in the vicinity of St. John's Way, as shown on the Policies Map, is allocated for employment uses (classes B1, B2 and B8).

1. Notwithstanding the existence of agricultural accesses to various parcels of the allocated employment land there will be a presumption against access directly off the A1122 to protect the strategic function of the Downham Market Bypass.
2. Access to the land west of the A1122 should be taken off the southern roundabout and the land east of the A1122 should be accessed from Station Road.
3. For access to be considered off the A1122 a ghost island right hand turn lane will have to be provided to mitigate the impacts of additional turning traffic on the A1122.
4. Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings.
5. A Site Specific Flood Risk Assessment may be required for certain development in line with Policy LP22 - Sites in Areas of Flood Risk.

Sustainability Appraisal

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.2	O	+	++	O	x	#	+	O	O	+	#
SADMP F1.2	O	+	++	O	x	O	+	O	O	+	N/A

The overall thrust of the policy remains the same. The suggested amendments simply provide a degree of clarity and detail. The score for heritage is now ‘#’ and this score is also awarded to ‘Climate Change’. As clearly this will depend upon the nature of the planning proposal and the detail of what type of business/economic use is prospered.

Draft Policy – F1.3 - Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1544800877559#section-s1544800877559>

Consideration of Issues / Conclusion: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

- Support for the policy from Historic England
- Land owner states that they are looking to continue bringing the site forward for development
- Wording on flood risk could be tidied up (suggested by the Environment Agency)
- NCC suggest amended wording to the policy item on minerals
- Member of the public raises issues regarding CIL and also the population of the Town

Having considered all of the points raised, it is proposed to keep the policy as is but amend some of the supporting text for completeness.

Policy Recommendation:

- **Leave the Policy as per the draft**
- **Amend the support text as follows:**

10.2.1 Downham Market stands on elevated ground on the eastern edge of the Great Ouse valley around 13 miles south of King’s Lynn. It is the Borough’s second largest town, with a population of around 10,000. **The 2011 Census recorded the population at 9,994 and the ONS based 2017 mid-year estimates provides a figure of 10,984.** The town grew up as an agricultural and trading centre and has a good range of services serving both the local population and a wider rural area.

10.2.3.8 **The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding**

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.3	+	+	O	x	+	#	+	#	O	#	+/#
SADMP E1.3	+	+	O	x	+	O	+	#	O	#	N/A

The policy is suggested to remain the same and therefore the thrust is same. Therefore it is little surprise that scores remain broadly the same with the expectation of 'Heritage' as a Heritage Impact Assessment is required and the policy acknowledges this. Clearly the impact will depend upon the design of the scheme. With regards to the new indicator 'Climate Change' Downham Market offers many services and facilities for day to day life of future residents and offers the a good opportunity for public transport via Bus services and the Train Station. There is also the possibility for enhanced green infrastructure and to aid connectivity in term of footpaths and cycling opportunities, and also to link to a possibly future expanded employment area at Bexwell. A '+/#' is awarded as the design of the development and individual dwellings will impact upon this. However it is acknowledged that policy requires an ecological study, landscaping including biodiversity, highways integration/improvements, pedestrian and cycle ways which link to the town centre, allotments, retention of the wooded area within the site and SuDs.

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Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Support	Support - Whilst there are no designated heritage assets within the site, the Wimbotsham Conservation Area including the grade II* church lies to the north of the site. We welcome the requirement for a heritage assessment and measures to conserve heritage assets as appropriate, given that the site lies within a short distance of Wimbotsham Conservation Area and other heritage assets		Noted & Agreed
Albanwise Ltd	Support	The Policy is essentially carried over from the adopted Site Allocations Plan. Given that the policy wording is essentially replicated, the aim and purpose of the policy is unclear. The policy needs to be updated and to reflect the latest housing supply position to provide further clarity. Outline permission has now been granted for land at Bridle Lane (16/00610/OM). The outline planning permission reflects the requirements set out in policy F1.3. Albanwise is currently considering the site disposal to a developer to enable the delivery of new homes in the next year or two. It is therefore anticipated new homes will start being delivered from the site in the short term. View attached document for plans and further information.		Support Acknowledged. The supporting text for the policy highlights that the site benefits from outline planning permission. The point of carrying over the policy is to support the allocation; the Borough Council is encouraged to hear that the landowners are seeking to bring forward the site for housing and that completions on site are anticipated within the next two years. Delivery will be key.
Norfolk County Council		The Mineral Planning Authority considers that similar wording to that included in the policies for the proposed new allocations, regarding mineral assessment, should be used in Policy F1.3, point 1.f to be replaced by: f. Submission of an Environmental Statement that satisfies Norfolk	See box to the left	Noted. The NCC Minerals and Waste Plan is a part of the Local Development Plan and therefore will need to be adhered to. The

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		County Council that: the applicant has carried out investigations to identify whether the resource (silica sand, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether there are opportunities to use the onsite carstone resource during the construction phase of development.		current policy item is broadly the same as the suggestion. Approx. half the site already has planning permission.
Elizabeth Mugova Environment Agency	Suggests	10.2.3.8 – The site is at little risk of flooding (Zone 1)	Reword to: The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding	Agreed – make modification to supporting text. For completeness amend the supporting text as suggested
Kelvin Loveday		I note with interest the local authorities stated requirement of " financial contributions towards the provision of infrastructure including; additional primary and secondary school places; strategic infrastructure for Downham Market, as set out in the Council's Infrastructure Study;"AND YET IT WOULD APPEAR THAT THE LOCAL AUTHORITY HAVE NOW 'NEGOTIATED ON BEHALF OF THE LOCAL COMMUNITY' THAT ALBANWISE DO NOT NEED TO MAKE ANY CIL CONTRIBUTIONS . During the Preferred Options consultation many local people suggested that this site was the best to meet the towns allocation. Many also highlighted the infrastructure deficits. None would have supported this site under these conditions. These arrangements are contrary to the principle of sustainable development. They are contrary to the notion that this Plan is 'positively prepared'. These arrangements are in place to give corporations incentives, enabling the local authority to meet housing targets. They are not 'on behalf of' the local authority and do not create 'sustainable' developments. I note that there are no 'incentives' offered to local builders which would of course benefit the local community.	Please state the current CIL arrangement with Albanwise in the interests of transparency.	Disagree. The CIL was established through consultation and examination via an Independent inspector: https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination
Kelvin Loveday		The population figure of 9,994 Downham Market is grossly misleading and based on a 2011 census. Downham has grown disproportionately before and after this census. The town's position between the A10 and railway has proved to be attractive for commuters making Downham a 'dormitory town'. Pushing up house prices and making them unaffordable to local people.	The population of Downham Market has grown disproportionately in	State population. The 2011 Census is currently the most recent one. The latest population figures which

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>This substantial residential expansion in recent years has not been matched by infrastructural improvements. Hundreds of responses to the Preferred Options consultation in 2013 highlighted significant infrastructure deficits. The Borough Council's Community Infrastructure Levy arrangements allowing Albanwise to avoid contributions can only make things worse. In fact the arrangements are a disgrace</p>	<p>recent years. The 2011 census figure does not reflect the current size of the town. Hundreds of responses to the Preferred Options consultation in 2013 highlighted significant infrastructure deficits. The town is popular with commuters and has become a dormitory town providing few benefits for the towns economy. In particular house prices have been driven up making most homes unaffordable to local first time buyers.</p>	<p>go down to this level are the ONS based 2017 mid-year estimates which provide a figure of 10,984. This could be quoted as well for completeness. https://www.norfolkinsight.org.uk/population/report/view/e55f083f354c46b9bf046e2d7f202abb/E58000974/ The CIL was established through consultation and examination via an Independent inspector: https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination</p>

Draft Policy – F1.4 - Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1544801069674#section-s1544801069674>

Consideration of Issues / Conclusion: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

- Support for the policy from Historic England
- NCC suggest amended wording in relation to the policy item on minerals
- Support for the allocation and a suggestion to allocate further land in the vicinity

Having considered all of the points raised, it is proposed to keep the policy as is.

Policy Recommendation:

- **Leave the Policy as is**

Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr F1.4	++	+	O	x	+	O	+	#	O	#	+/#
SADMP E1.4	++	+	O	x	+	O	+	#	O	#	N/A

The policy is suggested to remain the same. Therefore it is little surprise that scores remain broadly the same. With regards to the new indicator ‘Climate Change’ Downham Market offers many services and facilities for day to day life of future residents and offers the a good opportunity for public transport via Bus services and the Train Station, the site itself is reasonable well located in terms of distance to the town centre. A ‘+/#’ is awarded as the design of the development and individual dwellings will impact upon this. However it is acknowledged that policy requires an ecological study, improved bus linkages as well as cycling and walking routes to the town centre, landscaping including biodiversity, protection of the existing tree band, allotments and SuDs.

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England	Support	Support - We welcome the requirement for an archaeological assessment of this site		Noted & Agreed
NCC	Support & Info	The allocation Policy F1.4 contains a requirement at point a.e. for 'an assessment of the potential for extracting, either in advance of development or in the course of its development, any viable reserve of carstone or silica sand on the site.' A mineral assessment was submitted to the Mineral Planning Authority as part of the 16/01322/OM application. The intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that 'needless sterilisation' would not occur. It may be useful for the Borough Council to include this within the supporting text for the allocation, and remove point a.e.	See box to the left	Noted
Mr John Maxey Maxey Grounds & Co	Support & Suggests	Support the carrying forward of the existing allocation which is progressing, has consent for 300 and is in legals with a developer. The justification in para 10.2.4.5 for not allocating previously the additional land in the same ownership to the north was that the Council wished to split the allocation between 2 sites to aid delivery. Now that an additional 320 dwellings are to be allocated for the town, and this site is coming forward for delivery, the additional land to the north of the current allocation makes a logical extension of the current allocation, utilising some of the proposed additional growth. Wording of the policy should be amended to permit further phases of development north of the existing allocation	Extend the allocation to encompass the remainder of land within the same ownership as an further phase anticipated in 2022 - 2025	Support Acknowledged and further points Noted. We will review the housing numbers required in the relevant section of the Local Plan review. It will be up to Downham Market Town Council and the local community through their Neighbourhood Plan to decide how/where housing growth should be accommodated

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LP36 Hunstanton Policy and 10.4 Hunstanton and Hunstanton Site Allocations

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545042501134#section-s1545042501134>

Due to the small amount of comments made overall for Hunstanton we have decided to group these altogether with hyperlinks under each subsection for the reader to go to. If any actions are recommended as a direct result of the comments this appear in 'bold' in the 'Officer Response' column.

A number of comments were made by Historic England (HE) are these are considered in separate papers. However, comment has been made also. Hunstanton Town is currently in the process of a neighbourhood plan and have already gone through their regulation 14 stage which the Borough Council support.

Consideration of issues under the separate sections:

1. For policy LP36 two comments were made which were general comments on suggesting more ambitious targets for housing and also the need for successful regeneration
2. Under section 10.4 there were general comments on needing to amend wording referenced to a regular bus service and why is further growth being supported in Hunstanton
3. Under the Site Allocations F2.1 to F2.5:
 - a. many comments were objections from HE which are dealt with in a separate paper and link to the sites impact on the historic environment, heritage assets/listed buildings
 - b. comments related to updating policy wording/supporting text whereby planning permissions have changed status and clauses that are required have been completed.
 - c. Flexible wording to the allocations in relation to F2.3/F2.5 and the proposal of care home units

Sustainability Appraisal for LP36 Hunstanton Policy:

This policy has been updated from the CS ones to reflect the adoption of the SADMP, proposals within the Local Plan review and new programmes which are now in place. Consequently, the SA scores for the new policy are similar to those of the original CS one's par SA objective 18.

Objective 18 now scores '++' instead of O and this because Hunstanton are in the process of their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within this planning document. Given this having the old policy remain is not really an option as this doesn't reflect the current situation accurately.

Not having policies to cover the area, would result in a lower score and would not reflect the sustainability objectives of the borough council as well.

49 Policy	LP36: Hunstanton																					Overall Effect	
	SA Objective:																						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+		-
LP36	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	++	++	++	+15	-4	Likely Positive Effect +11
CS05	-	O	O	+/-	+	-	+	+	O	O	+/-	O	O	+	++	O	+	O	++	++	+13	-4	Likely Positive Effect +9
No Policy	-																						Likely Mixed Effect +2
	-	O	O	+/-	+/-	-	+	O	O	O	-	O	O	+	+	O	+	O	+	+	+8	-6	

Recommendations which have been made for LP36 Policy highlighted in yellow:

1. Assessing the East Marine Plans (2015) and the policies we thought it would be appropriate to add four more policies which relate to Hunstanton: SCO3, FISH1, TR1 and TR3 after discussions with Marine Management Organisation through our duty to cooperate of discussing where more policies would be feasible.
2. Updating the progress made on Hunstanton Neighbourhood Plan

Policy LP36 Hunstanton

1. The focus for Hunstanton will be on ensuring that as a main town it develops its position as a successful service hub for the local area, while strengthening the role as a tourist destination with year-round activities. This will utilise evidence within the previous masterplan and the Hunstanton Prospectus, Southern Seafront Masterplan and Neighbourhood Plan.
2. **The strategy for the town is to:**
 - a. retain and strengthen the role of Hunstanton as a main town in the north of the borough and a service centre supporting retail, culture and social infrastructure;
 - b. build upon the relationship between Hunstanton and King's Lynn so the town is able to benefit from growth proposals for King's Lynn.
3. Provision will be made for at least 333 new homes with new allocations of at least 40 houses.
4. Limited locations in Hunstanton are available to accommodate new development.

5. The aim is to:

- a. provide modest and balanced employment growth to create jobs and opportunities to meet the needs of existing and new residents. This should be quality year-round employment, with less reliance on seasonal/tourist activity; while acknowledging and being sympathetic to the valuable natural assets of the town and surrounding area;
- b. promote opportunities for residential development within the town centre, particularly for affordable housing, if suitable it could occur as mixed use, with a commercial use on the ground floor;
- c. strengthen the town's role as a visitor destination. Support will be given to additional sustainable tourist facilities and leisure development which extends the season by providing diverse year-round activities, as well as high-grade seasonal activities and facilities, while acknowledging and being sympathetic to the valuable natural assets of the town and surrounding area;

6. Ensure that the transport and movement strategy for the town includes:

- a. securing the provision of adequate levels of parking in the town as a whole, particularly during the summer months.
- b. improvements to public transport; increasing the frequency and reducing journey times of services to King's Lynn; supporting more frequent services along the coast; and strengthening public transport links within rural areas;
- c. improvements to routes, signage and facilities for walking and cycling.
enhance the local character of the town, promoting high quality design of the local environment and the public realm. In particular to:
 - i. respect the heritage of Hunstanton while promoting the vibrancy of the town centre and The Green;
 - ii. ensure that new development meets modern requirements while respecting the historic environment in the conservation area;
 - iii. promote a new style of design for the Southern Seafront area, creating a new identity that reflects modern and high-quality architecture.

7. Seek to enhance green infrastructure in the town in accordance with the Green Infrastructure Strategy in particular Oasis Way; and links to Heacham and Hunstanton Park.

Neighbourhood Plan

A draft Hunstanton Neighbourhood Plan was published for consultation in accordance with the Regulation 14 stage in November 2018. The Neighbourhood Plan is still in the process of being prepared accordingly.

Southern Seafront Master Plan

10.3.2 A Southern Seafront Master Plan is being prepared for an area of the seafront between The Green and the Power Boat Ramp.

Policy LP36 contributes to Strategic Objectives 1-5 Economy, 6-10 Society, 11-15 Environment and 23 to 27 for Hunstanton.

Recommendations made for Supporting text 10.4 Hunstanton highlighted in yellow:

1. Added text to 10.4.3 in reference to the local materials and character of Hunstanton Area with reference made to the Conservation Statement which has been footnoted
2. Amended text from 'regular' to 'daily' bus service
3. Amended wording for Neighbourhood Plan status
4. Add new summary wording and relevant policies for East Marine Plan Policies at the end

10.4 Hunstanton

Main Town

Description

10.4.1 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.

10.4.2 Hunstanton evolved from the vision of Henry Styleman Le Strange for a planned coastal holiday village to be built on his own land, with the focal point to be a triangular green sloping down to the sea. The Golden Lion Hotel was the first building (1846) but development remained slow until the Great Eastern Counties Railway decided to build the line from King's Lynn to Hunstanton in 1862. Under the patronage of his son Hamon Le Strange and spurred on by the investment boom between 1850 and 1870, Hunstanton soon expanded beyond the original planned coastal village to become a fully-fledged Victorian seaside resort.

10.4.3 Hunstanton's main buildings are substantial but not over grand; its squares and open spaces are elegant yet informal. It is a comfortable, modest place, small in architectural scale with well-defined boundaries. Its character is spacious, breezy and green, where the effect of the open sea and sky has a strong impact on the light, views and settings of the buildings. As highlighted in the Conservation statement, Hunstanton has a variety of local materials which make up the built environment and the most commonly found in the new town is carstone. The Hunstanton Conservation Area was first designated in 1984 and its boundaries were extended in 2009¹.

10.4.4 The Wash is recognised internationally, nationally and locally as a critically important site for wildlife. A summary of relevant statutory designations on The Wash includes; Area of Outstanding Natural Beauty (AONB), National Nature Reserve (NNR), Ramsar Site, Site of Special Scientific Interest (SSSI), Special Protection Area, Special Area of Conservation, and European Marine Site.

10.4.5 The Strategic Flood Risk Assessment identifies that broadly the town is not constrained by flood risk, except for an area to the south of the town which is subject to flood zones 2 and 3 (medium and high risk).

10.4.6 The town has limited transport links, with road access to the town from the A149. However, there is a regular daily bus service to King's Lynn, surrounding villages, and also along the Norfolk coast.

10.4.7 Policy LP36 states that the town will provide for at least 333 new homes (existing allocations), with new allocations of at least 40 new dwellings and approximately 1 ha of employment land (existing allocation).

Neighbourhood Plan

10.4.8 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Hunstanton Town Council is in the process of preparing a Neighbourhood Plan for their area. The Hunstanton Neighbourhood Plan Area was formally designated by the Borough Council on 5 February 2013 and corresponds with the boundaries of Hunstanton Parish.

¹Borough Council of King's Lynn Hunstanton Conservation Area Character Statement (2009) <https://democracy.west-norfolk.gov.uk/Data/Cabinet/20091006/Agenda/Hunstanton%20-%20Conservation%20Area%20Character%20Statement.pdf>

10.4.9 The Town Council has prepared a draft version of their Neighbourhood Plan which went out to consultation at the Regulation 14 Stage in November 2018. Their Neighbourhood Plan assesses sites and allocates a site to meet the agreed identified need for the town.

Policies

10.4.10 Strategic Policy LP36 outlines our policy approach for the town, providing further information and guidance on its role as a service hub for the local area, and a tourist destination with a range of facilities/activities. The following pages detail the policies for Hunstanton town centre area and retailing and set out the existing site allocations including housing and employment land.

Supporting East Marine Plan Policies are:

In summary the policies bullet pointed below support policy LP36, to find out more information on the supporting policies the hyperlink is active over the policy number.

- Health and social well-being and access to the coast and marine area - [SOC1](#) and [SOC3](#)
- Economic- [EC2](#)
- Fisheries- [FISH1](#)
- Tourism and Recreation Areas - [TR1](#), [TR2](#), [TR3](#)

Recommendation for Site Allocations:

- 10.4.1 F2.1 - Hunstanton Town Centre Area and Retailing Policy – **NO CHANGE**

Policy F2.1 Hunstanton - Town Centre Area and Retailing

A town centre area for Hunstanton is defined on the Policies Map.

1. This will be taken as the town centre for the purposes of retail development in and around Hunstanton, and the application of the sequential test in the National Planning Policy Framework.
2. The Borough Council will promote this area as the prime focus in the town for retail, community and professional services, leisure, culture and entertainment. The historic character, local distinctiveness, facilities, amenity and vibrancy of the area will be maintained and enhanced, to strengthen the appeal of the town centre.
3. In order to achieve this, proposals for retail, offices serving visiting members of the public, hotels, assembly and leisure uses, and community and cultural facilities (e.g. Use Classes A, C1, D1, D2 and sui generis theatres) will be particularly encouraged in the area and will be assessed against their compliance with Policy LP32.
4. Other uses which contribute to the character and vibrancy of the town centre will be encouraged, including residential (C3), and offices/light industry (B1). The development of high-quality housing in the town centre would be particularly welcomed for its contribution to its architectural quality, social mix, and economic health.
5. Additional general industrial uses (B2) and warehousing and distribution (B8) will not be permitted in the town centre area unless it can be demonstrated that they will not have adverse impacts on the character, amenity and traffic of the town centre.
6. The retention of active frontages (i.e. window displays, entrances, and views of internal activity, etc.) will be encouraged in the main streets of the Town Centre, as will the refurbishment or replacement of shop frontages where this secures an active frontage and strengthens the local distinctiveness of the town and its heritage, and the active use of upper storeys of buildings. However, this does not preclude the removal of retail frontages outside the main retail streets of the town.



- **10.4.2 F2.2 - Hunstanton Land to the east of Cromer Road Policy**

1. Add updated text to the site description under 10.4.2.1

Policy F2.2 Hunstanton - Land to the East of Cromer Road

Land amounting to 6.2 hectares is allocated for residential development of at least 120 dwellings.

Development will be subject to compliance with all of the following:

1. Provision of safe vehicular and pedestrian access (to be from the A149) including a new crossing point and access to sustainable transport links,
2. Provision of affordable housing in line with current standards;
3. Submission of details of layout, phasing, and appearance;
4. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
5. Incorporation of a high quality landscaping scheme including the retention and enhancement of established hedgerow and the planting of new shelter belts and woodland to the north and east boundaries to minimise the impact of the development on the setting of Old Hunstanton Conservation Area, the Grade I Listed Hunstanton Hall as well as the Hall's park and gardens which are listed as Grade II and the North Norfolk Coast Area of Outstanding Natural Beauty (AONB);
6. Submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality;

7. Outdoor play/recreation space of at least 0.67 ha (based on a population of 280, assuming 2.33 persons per dwelling, and a requirement of 2.4ha per 1,000 persons);
8. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area. This may require open space provision over and above the Council's normal standards for play space detailed in the previous clause, and may consist of some combination of:
 - a. informal open space (over and above the Council's normal standards for play space);
 - b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
 - c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
9. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog- walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Protection Area, and the sensitivity of those areas to dog walking and other recreation.
10. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area.
11. The site overlies a Groundwater Vulnerability Zone. Accordingly, the developer should address any risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
12. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, schools, highways etc. necessary to serve the development.

Site Description

10.4.2.1 The site has been granted reserved matters (18/00418/RMM) for 120 new homes, the site has commenced.

- **10.4.3 F2.3 - Hunstanton Land South of Hunstanton Commercial Park Policy**

1. No Proposed actions

Policy F2.3 Land south of Hunstanton Commercial Park

Land south of Hunstanton Commercial Park amounting to 5 hectares, as identified on the Policies Map, is allocated principally for housing with care, with a supplementary allocation of general purpose market housing to aid viability.^(14²)

1. The mixed uses comprising –
 - a. at least 60 housing with care units;
 - b. approximately 50 general housing units;
 - c. affordable housing requirements as per Strategic Policy LP25. This will apply across the whole site.^(15³)
2. Development of the site must be as part of a comprehensive scheme, which must be shown to bring forward the housing with care units. The final housing numbers are to be determined at the planning application stage and be informed by a design-led master planned approach.
3. The proximity of the employment allocation F2.5, and the potential for a care home on part (or all) of that allocation could support an interdependency between this and the housing with care element.

14. ² Housing with care is purpose built self-contained housing with facilities and services such as 24/7 on site care and facilities, that assists residents to live independently. There is an expectation that in line with good practice the scheme will include the provision of community facilities i.e. restaurant, retail (hairdressers/corner shop) and opportunities for social interaction.

15. ³ The affordable housing requirement will apply to the housing with care and the general-purpose market housing, all dwellings that fall within the C3 use class of the Town and Country Planning (Use Classes) Order 1987.

4. Development will be subject to compliance with all of the following:
 - a. provision of safe vehicular and pedestrian access (to be from the A149) including a new crossing point (to serve proposals F2.3 and F2.5) and access to sustainable transport links;
 - b. submission of details of layout, phasing, and appearance;
 - c. incorporation of a high quality landscaping scheme including the retention and enhancement of established hedgerow and the planting of new shelter belts to the north, east and southern boundaries to minimise the impact of the development on the setting of Grade II* listed Smithdon High School and gym, Grade II* listed and scheduled remains of St Andrew's Chapel and the North Norfolk Coast Area of Outstanding Natural Beauty;
 - d. submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
 - e. submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality, accompanied by an Archaeological Field Evaluation of the site, if required;
 - f. provision of affordable housing on site, or an equivalent financial contribution, to meet current standards.
 - g. Outdoor play/recreation space of at least 0.28 ha (based on a population of 233, assuming 2.33 persons per dwelling, and a requirement of 2.4ha per 1,000 persons);
5. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area. This provision may consist of some combination of:
 - a. informal open space (over and above the Council's normal standards for play space);

- b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
- c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
 6. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area, and the sensitivity of those areas to dog walking and other recreation.
 7. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area.
 8. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, schools, highways etc. necessary to serve the development.

Site Description

10.4.3.1 Outline planning permission (16/00084/OM) for 60-unit care home and 60 new dwellings

- **10.4.4 F2.4 - Hunstanton Land north of Hunstanton Road Policy**

1. Amend Site Description text to the most up to date information
2. Remove criterion 14 and move to the supporting text due to this has been completed

Policy F2.4 Land North of Hunstanton Road

Land north of Hunstanton Road amounting to 12.6 hectares is allocated for development of 163 dwellings on 6.2 ha of the site, and open space on 6.4 ha of the site.

Development will be subject to:

1. Submission of a final masterplan for the site incorporating details of layout, phasing and conceptual appearance;
2. Provision of affordable housing in line with current standards;
3. Provision of safe vehicular and pedestrian access;
4. Local highway improvements to fully integrate the development into the surrounding network.
5. Details of plans for the proposed open space with regards to public access, recreational and ecological opportunities, potential hard and soft landscaping including play space(s) and arrangements for the ongoing management of the space;
6. Enhanced informal recreational provision on, or in the vicinity of the allocated site to limit the likelihood of additional recreational pressure (particularly in relation to exercising dogs) on Habitats Regulations protected nature conservation sites in the wider area.
7. This provision may consist of some combination of:
 - a. informal open space (over and above the Council's normal standards for play space);

- b. pedestrian routes which provide a variety of terrain, routes and links to greenspace and/or the wider footpath network;
 - c. a contribution to implementation of the Borough's Green Infrastructure Strategy as it relates to Hunstanton, or other greenspace provision or management in the wider area within which the site is located.
8. Provision of a programme of publicity aimed at both occupants of the development and other residents of Hunstanton, highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Protection Area, and the sensitivity of those areas to dog walking and other recreation;
 9. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect impacts through recreational disturbance on the Wash Special Protection Area and the North Norfolk Coast Special Protection Area;
 10. Submission of a site-specific Flood Risk Assessment, and accompanying topographical information, to be prepared in order to ensure that development is designed appropriately and built in those areas of the site least at risk of flooding;
 11. Incorporation of a high-quality landscaping scheme to limit the visual impact of proposed development on the countryside and on the southern approach to Hunstanton;
 12. Submission of details of sustainable drainage measures and how they will integrate with the design of the development and how they will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
 13. An Archaeological Field Evaluation of the site should be undertaken following on from the results of the desk based Archaeological Assessment. This should be undertaken prior to consideration of extraction of minerals from the site;
 14. Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (sand, gravel, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not): there are opportunities to use the onsite resource during the construction phase of development

15. A financial contribution to existing infrastructure and/or services or provision of new infrastructure necessary to serve the development to be determined upon submission of the planning application.

Site Description

10.4.4.1 Full planning permission (14/01022/FM) for 166 new homes. Construction of the site is underway with a significant number of the homes being completed and now lived in.

10.4.4.2 The allocation Policy F2.4 contained a requirement for: “*Submission of an Environmental Statement that satisfies Norfolk County Council that: the applicant has carried out investigations to identify whether the resource (sand, gravel, carstone) is viable for mineral extraction; and if the mineral resource is viable, that: the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not): there are opportunities to use the onsite resource during the construction phase of development.*” A mineral assessment was submitted to the Mineral Planning Authority as part of the application. Intrusive site investigations that took place across the site were able to prove to the satisfaction of the Mineral Planning Authority that viable mineral did not occur on site, and that ‘needless sterilisation’ would not occur.

- **10.4.5 F2.5 - Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy**

1. Amend the Site description to the most up to date permission status
2. Add Criterion 3 to support Historic England's comments to protect the nearby heritage assets/listed buildings

Policy F2.5 Hunstanton - Land south of Hunstanton Commercial Park

Land south of Hunstanton Commercial Park Land amounting to 1 hectare identified on the Policies Map is allocated for employment use.

Development will be subject to the following:

1. A financial contribution for any upgrades or additional provision in terms of water supply, sewerage, highways etc. necessary to serve the development;
2. The site overlies a Groundwater Vulnerability Zone. Accordingly, the developer should address any risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
3. Submission of a Heritage Asset Statement that establishes that development would:
 - a. enhance and preserve the setting of the nearby Listed Building Grade II* Smithdon High School;
 - b. will have no negative impact on Heritage Assets in the locality;
 - c. careful design ensuring no adverse impact on the Conservation Area close by, and to strengthen local distinctiveness;

d. accompanied by an Archaeological Field Evaluation of the site, if required;

F2.5 Site description – Outline planning permission (16/00084/OM) for 60-unit care home and 60 new dwellings.

Table of all comments raised under Hunstanton:

Section	Consultee(s)	Nature of	Summary	Consultee modification	Officer response
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		response			
<p><u>Hunstanton</u></p> <p>LP36 Policy</p>	<ul style="list-style-type: none"> • Ed Durrant (Pigeon Investment Management) • Ms Jan Roomes (Hunstanton Town Council) 	Mixed	Suggestion for a more ambitious target for housing and general comments on successful regeneration set out by the town council.	N/A	The Town Council is preparing a neighbourhood plan, dealing amongst other things, with housing growth.
<p>10.4</p> <p><u>Hunstanton</u></p> <p>66</p>	<ul style="list-style-type: none"> • Councillor Tim Tilbrook • Ms Jan Roomes 	Object	One comment posed the question of why Hunstanton was supporting further growth. Mentioning their viewpoints on the road network, future jobs and homes.	Jan Roomes suggested the reference to a regular bus service to surrounding villages should be removed.	In general terms new allocations are located where public transport is more readily available and within sustainable settlements - i.e. in main towns. Hunstanton plays an important role within the borough as one of the smaller towns and a successful service centre for residents and tourists. So focused growth and strengthening of Hunstanton's role is held within the plan and also supported within Hunstanton Town Council approach to preparing a

					neighbourhood plan. Reference to a regular bus service has been taken on board and wording change to 'daily' instead.
<u>10.4.1 F2.1 - Hunstanton Town Centre Area and Retailing Policy</u>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) 	Object	More detailed reference to the specific character and vernacular of Hunstanton within the policy		Historic England comments have been dealt within in a sperate paper. Detail on the character will be dealt with in Hunstanton Neighbourhood Plan.
<u>10.4.2 F2.2 - Hunstanton Land to the east of Cromer Road Policy</u>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) Mr Robert Corby Norfolk County Council Infrastructure Development Community & Enviro Services 	Mixed	<p>Objection was made by Historic England in its impact to the historic environment and potential detraction from the setting of Old Hunstanton conservation area.</p> <p>Concern on the planning permission approval in relation to a high-quality landscaping scheme</p> <p>NCC stated F2.2.6 has been completed so</p>	As the developers have achieved planning permission that is in conflict with the local plan, in that the proposals rip up a considerable amount of hedgerow we were trying to protect - may be the developers should be under obligation to provide environmental improvements beyond those already agreed,	Historic England comments have been dealt within in a sperate paper. We note the concerns raised; this allocation is currently under construction. In reference to the comment made by the NCC this will be amended.

			thereby should be removed		
<p>71</p> <p><u>10.4.3 F2.3 - Hunstanton Land South of Hunstanton Commercial Park Policy</u></p>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) Ed Durrant Pigeon Investments Management 	Mixed	<p>Objection was made by Historic England in its impact to the historic environment.</p> <p>Suggested flexible approach to the wording due to facilitate the overall scheme of delivery</p>	<p>The wording of bullet point 1 of draft Policy F2.3 should be amended as set out below:</p> <p>a. at least 60 housing with care units;</p> <p>b. approximately 50 60 general housing units;</p> <p>c. affordable housing requirement as per Strategic Policy LP25</p> <p>Notably we suggest that bullet point 2 of Policy F2.3 should be amended as set out below:</p> <p>2. The final housing numbers are to be determined at the planning application stage and be informed by a design-led master planned approach, which illustrates how the site will be brought forward to deliver the mix of uses identified above. Development that facilitates the delivery of the care uses, including delivery of a serviced site for the care home and housing with care units, will be encouraged.'</p>	<p>Historic England comments have been dealt within in a sperate paper.</p> <p>However, no further action in relation to comments made by Pigeon Investments.</p>
	<ul style="list-style-type: none"> Ms Debbie 				

<p><u>10.4.4 F2.4 - Hunstanton Land north of Hunstanton Road Policy</u></p>	<p>Mack (Historic England)</p> <ul style="list-style-type: none"> Norfolk County Council Infrastructure Development Community & Enviro Services 	<p>Support</p>	<p>Historic England welcome criterion 13 and NCC stated to remove criterion 14 due to the mineral assessment was submitted and proved to be satisfactory.</p>	<p>Mention the wording set by NCC in the supporting text for the mineral assessment</p>	<p>Note the support.</p> <p>Amendments will be made to criterion 13 as suggested by the NCC.</p>
<p><u>10.4.5 F2.5 - Hunstanton Employment Land south of Hunstanton Commercial Park Land Policy</u></p>	<ul style="list-style-type: none"> Ms Debbie Mack (Historic England) Ed Durrant (Pigeon Investment Management) 	<p>Mixed</p>	<p>Historic England object this site over the suitability, viability and intrusion on the listed high school.</p> <p>Pigeon Investment: Wording should be amended to acknowledge the potential for a care home and provide flexibility.</p>	<p>HE Modification: The policy should include design criteria in relation to the protection of nearby heritage assets. It would be helpful if the Plan could clarify whether this site has come forward for development to date.</p> <p>Pigeon Investment modification:</p> <p>The wording of the first line of Policy F2.5 should be amended as set out below:</p> <p>Land south of Hunstanton Commercial Park, amounting to 1 hectare identified on the policies map is allocated for</p>	<p>Historic England comments have been dealt within in a sperate paper. However, this change and clarification will be made to the policy.</p> <p>Pigeon Investment – No change will be made to the wording because currently it ensures the delivery of the housing with care scheme</p>

				<p>employment use or a care home.</p> <p>In addition, a further bullet point should be added to Policy F2.5 to acknowledge the potential for a care home to support an interdependency between a care home and the housing with care element. The policy should also provide flexibility in respect of the location of the care home within the combined F2.3/F2.5 allocation, as per the illustrative masterplan that accompanies the outline consent (16/00084/ON), which shows both the housing with care and care home located within F2.3 (as opposed to F2.5). We suggest that the following bullet points are added to Policy F2.5:</p> <p>3.The potential for a care home on F2.5 and the proximity of the housing with care and general housing allocation on F2.3, could support an interdependency between the housing with care and care home.</p>	
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				4. In the event that F2.3 and F2.5 are brought forward as part of a comprehensive scheme including a care home then general housing and housing with care will be permitted within F2.5.	
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Draft Policies - Marham

Link to draft policy and comments in full received from the draft consultation stage:

GKRSC: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759463#section-s1542882759463>

Marham: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759464#section-s1542882759464>

G56.1- Marham Land at The Street: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545131745343#section-s1545131745343>

MAR1-Marham Land off School Lane: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545131881851#section-s1545131881851>

Recommendation(s):

- Carry forward the allocation made by the SADMP (2016)
- Having considered all of the points raised, and in particular those of Norfolk County Council as the Local Highway Authority who would object to site being included in the Plan, it is proposed not to carry forward the draft allocation to the submission version of the Local review Plan (MAR1 / Site H219).
- The housing numbers may suggest that there is no absolute requirement to allocate a site at Marham. However, given the that Marham is classed as Growth Key Rural Service Centre (GKRSC) it is recommended that Site 2H041 be proposed for the allocation of at least 35 dwellings as part of the Local Plan review
- Amendments to supporting text in line with the above and to correct inaccurate information with regards to the description of Marham as highlighted by consultees

Summary of Comments: (Please see Appendix 1 for comments and responses)

- Marham not located close to the A10 – so not in accordance with growth strategy
- Some consider there is no need for a further housing allocation at Marham beyond that contained within the SADMP
- Objections to proposed new draft housing allocation: Highways issues in terms of either access or local highway network or footpaths raised by Norfolk County Council, Marham Parish Council and members of the local community
- Other issues raised with regard to the site: flood risk, amenity, broadband capacity, wildlife
- The Local Plan review states that services/facilities on the base are available for all to use, they are not
- Concern raised with regard to Norfolk County Councils emerging Waste and Minerals Plan
- ‘At least’
- Concern raised over the consultation process

Additionally

- Two further sites have been submitted for consideration, one passed the HELAA assessment and is assessed further in the Sustainability Appraisal. The other did not pass the HELAA assessment due to access being identified by Norfolk County Council as the local highway authority as a constraint.
- An indicative layout of Site 2H041, which passed the HELAA, is assessed in the SA and is recommended for allocation in the Local Plan review submission version is contained as Appendix 2.

Conclusions

Whilst Marham isn't located directly along the A10 / main rail line, it is a relatively short distance to the A10, Downham Market and associated train station. The RAF Base is one the largest direct and indirect employers within the Borough and it is mainly for this reason the area of Marham comprising the village and the RAF Base is considered a Growth Key Rural Service Centre.

The draft Local Plan review Consultation process was carried out in accordance with the regulations. In fact, it was extended for an additional 2 weeks to an 8-week period allowing for a greater and more detailed response from those who wished to take part. A press event was hosted and reported in local papers, drop-in sessions were held at the three main towns, and all documents were available online.

At the time of the Local Plan review consultation with regards to the emerging Norfolk County Council Minerals and Waste Plan, it is suggested that commenters join in with that process. However, it should be noted that the NCC M&WP once adopted will form part of the Local Development Plan.

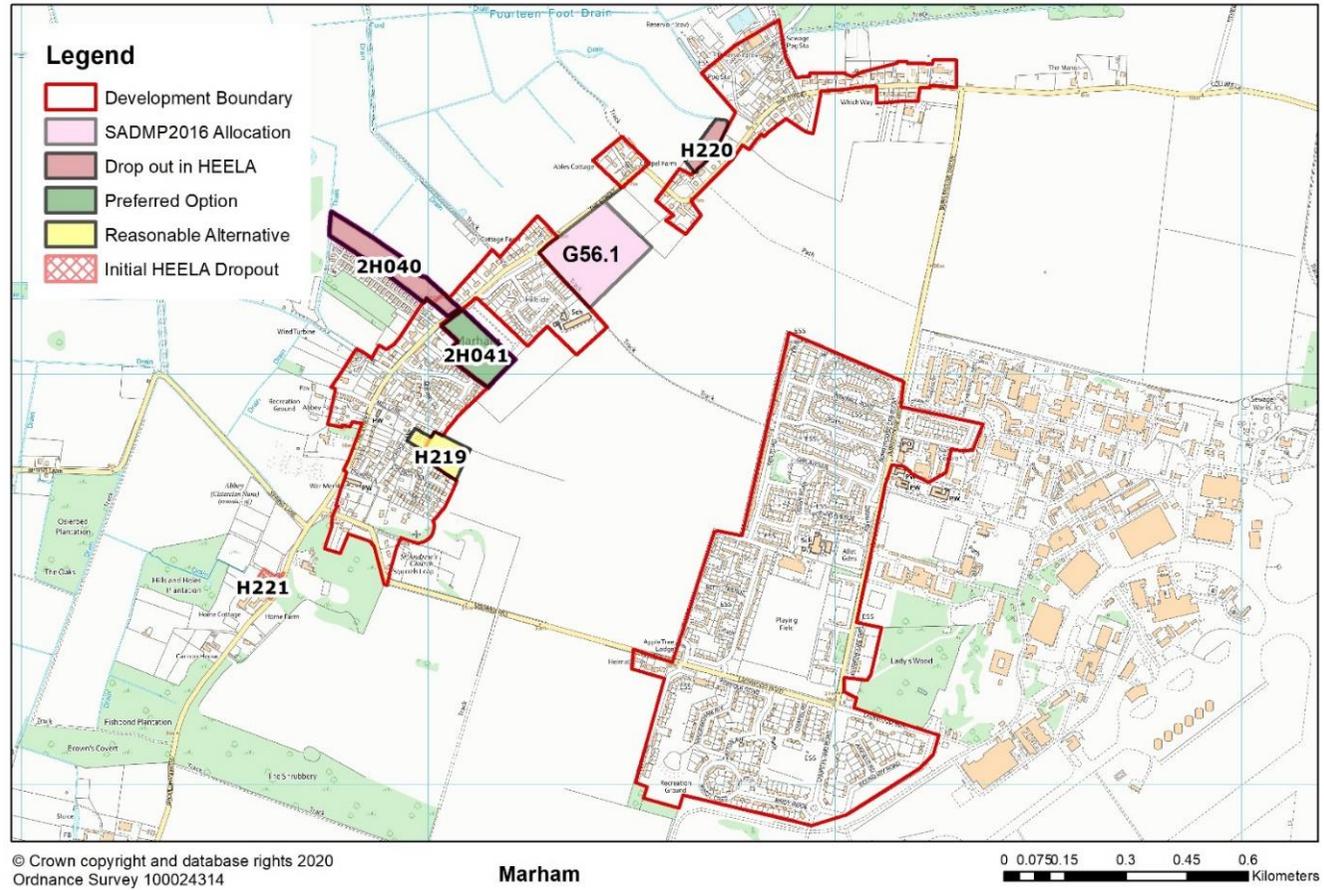
77 'At Least' forms part of the policy. The SADMP inspector felt this was needed and this was put forward as a main modification to the Plan in order for it meet the tests of soundness. It is required to ensure that the Borough Council has the best opportunity for meeting its local housing need. This added flexibility also guards against other sites potentially not coming forward as envisaged at the time of the SADMP adoption for reasons unknown at the time. The SADMP pre-submission consultation, examination including proposed modification consultation and subsequent adoption of the Plan was all carried out in a comprehensive and transparent way. Please see Inspector's Report: https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_development_management_policies_plan/367/examination

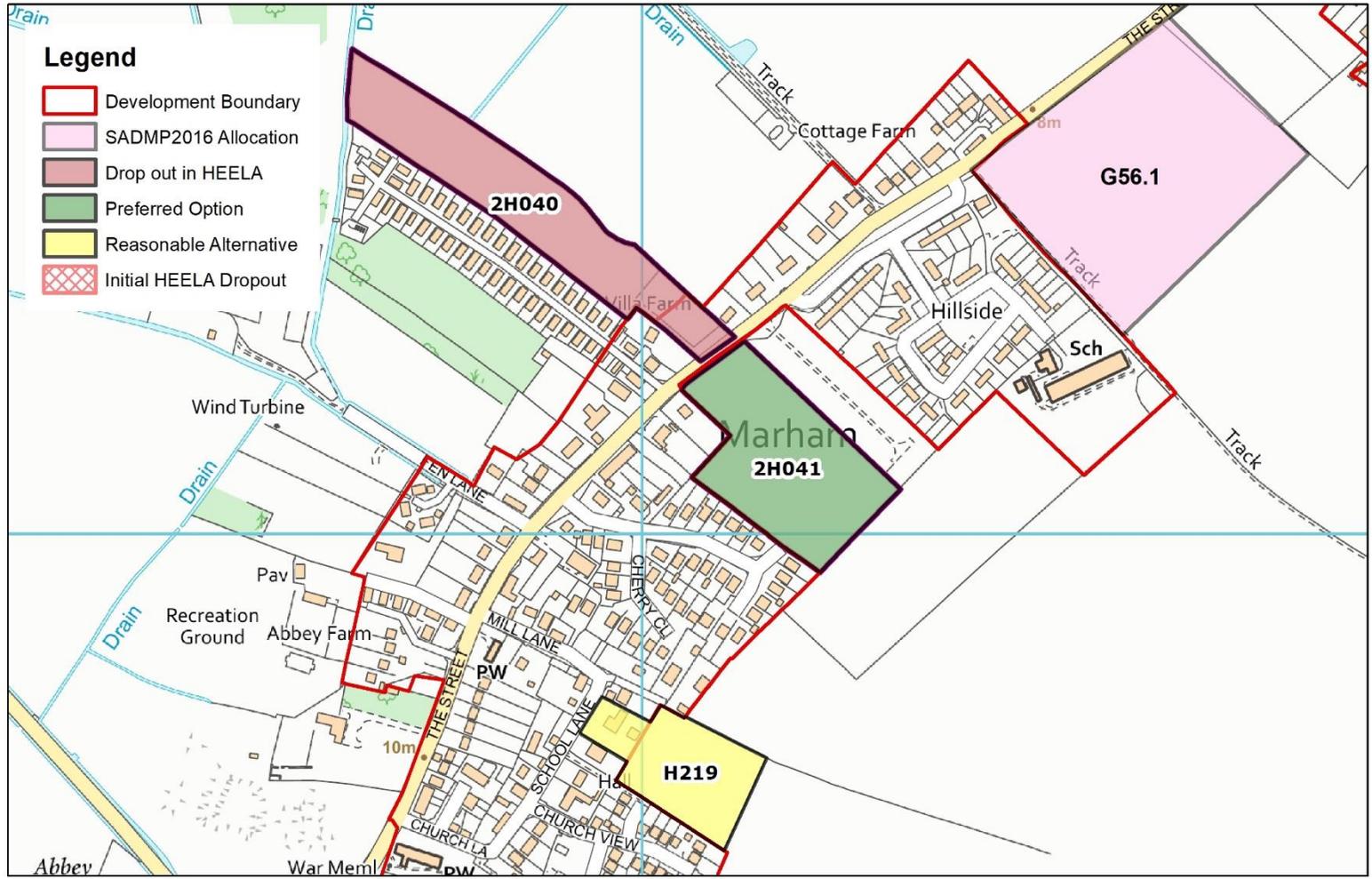
With specific reference to the proposed site, the comments from NCC would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared early on with the site owner for their consideration. They have not been in contact since. Based upon this it is proposed to no longer carry forward the site as an allocation as part of the Local Plan review.

However, given Marham's status within the Plan as a GKRSC, other sites which have been proposed through the consultation, should and have been assessed and following this it is recommend that Site 2H041 is proposed for allocation.

Marham-Sustainability Appraisal – Site Map

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Marham



Marham – Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr G56.1	+	++	o	x	+	o	++	+	o	+/x	#
SADMP G56.1	+	++	o	x	+	o	++	+	o	+/x	n/a
H219	+	#	+	xx	+	o	x	o	o	#	#
2H041	+	+	+	x	+	#	+/#	o	o	#	#

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

08

Marham- Sustainability Appraisal – Site Commentary

H219 (11-11-20166123) – This site scores positively for the factor ‘access to services’ as the site is located within a reasonable distance to a number of local facilities including the village hall, church, and primary school. The site is located within Flood Zone 1 (low risk), the LLFA consider that standard information would be required at the planning stage and that there are little to no constraints, hence there is a positive score for ‘flood risk’. There is also a positive score for ‘economy A business’ as not only would there be an economic benefit from the construction and associated industries, an increase in the local population could support local services and facilities, and with RAF Marham close by could provide off-base housing for those directly or indirectly employed by one the Borough’s largest employers. It could also provide affordable housing close to RAF Marham. However, this has been balanced by several of the local community objecting to the site’s inclusion within the Local Plan review as part of the draft consultation. Hence the ‘#’ score for ‘community and social’.

There would be a neutral impact upon ‘heritage’, ‘landscape & amenity’ and ‘natural environment’. The site is located to east of the village, to north, south and west of the site is existing residential housing in an estate style layout, to the east and north east is countryside, however development of the site

would be seen in the context of the existing built environment from either short distance views from the adjacent road/foot path network or limited longer distance views that may be possible from the road network and local footpaths.

There is a negative recorded for the factor 'economy B food production' as the site is located in area classed as Grade 2 / Grade 3 Agricultural Land, however this is a constraint upon the settlement. It is noted that the current owners state that site is currently used as a horse paddock. The score for 'infrastructure, pollution & waste' is dependent upon implementation.

Through the draft Local Plan review consultation Norfolk County Council as the local highway authority raised an objection to the site. They consider that Mill Lane, School Lane and Church road are all sub-standard. As Highways are looking at this review as a new plan, they would not like to see the site come forward and are now placing significant emphasis on the ability to achieve safe pedestrian access to the school which this site cannot. Therefore, it is considered that roads are narrow with no footways and a safe access, particularly pedestrian access, cannot be provided between the site and The Street. They consider this is not a preferred site. The score for 'climate change' is mixed as although the location is considered sustainable a lot would depend upon the nature of the housing brought forward.

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2H041 (29-04-20195110) – This site scores positively for the factor 'access to services' as the site is located within a reasonable distance to a number of local facilities including the village hall, church, and in particular the primary school. The site has been the subject of a pre-application and as a part of this Norfolk County Council as the local highway authority raised no objection in principle to the site, the same position was echoed as part of the 2019/20 HELAA consultation.

The site is located within Flood Zone 1 (low risk). There is also a positive score for 'economy A business' as not only would there be an economic benefit from the construction and associated industries, an increase in the local population could support local services and facilities, and with RAF Marham close by could provide off-base housing for those directly or indirectly employed by one the Borough's largest employers. It could also provide affordable housing close to RAF Marham. Hence the '+' score for 'community and social'.

The site is located relatively central within the village. The site is bordered by a combination of existing residential housing in an estate style layout/ ribbon development, a mobile home park, a cemetery and open countryside, however development of the site would be seen in the context of the existing built environment from either short distance views from the adjacent road/foot path network or limited longer distance views that may be possible from the road network and local footpaths. Consideration will need to be given to this context in any design scheme.

The score for 'Heritage' is '#' as through the pre-application process Norfolk Historic Environment Services (HES) stated that the site lies between the 12th century parish Church of the Holy Trinity and Cistercian nunnery to the southwest and the cropmarks of a medieval moated site (perhaps a manorial centre) to the northwest. In addition, Prehistoric, Roman, Anglo-Saxon and medieval finds have been recovered from the surrounding fields including an Early Saxon brooch (perhaps indicating burials) to the east. Consequently, there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed development. If planning permission is granted, HES therefore ask that this be subject to a programme of archaeological mitigatory work in accordance with *National Planning Policy Framework* para. 199.

There is a negative recorded for the factor 'economy B food production' as the site is located in area classed as Grade 3 Agricultural Land, however this is a constraint upon the settlement. The score for 'infrastructure, pollution & waste' is dependent upon implementation. The score for 'climate change' is mixed as although the location is considered sustainable a lot would depend upon the nature of the housing scheme brought forward.

SADMP Allocation

G56.1 – This site having been through the Local Plan process already, is allocated by the SADMP for a residential development of at least 50 dwellings. The site has since come forward with a phased planning proposal. The first phase being frontage development for 8 new homes (18/01896/F). This site scores highly positive in the sustainability factor 'highways & transport' as development of the site as indicated by the agents would provide a new access road and drop-off facility to the school, a new bus layby, and new and improved footpaths in the vicinity. The site also scored highly positive in the factor 'community & social' as not only would it provide the facilities already mentioned it would provide affordable housing and was supported by Marham Parish Council and the public. Positive scores are made with regard to 'access to services' being in close proximity to the junior school and the shops located on the RAF base, 'flood risk' being located in a low flood risk zone and 'landscape and amenity' as the agents of the land owner have illustrated that a significant portion of the site is to be given over to open space including a substantial margin of landscape planting. As with all of the growth options proposed for Marham there would be neutral impacts upon 'Economy A business', 'heritage' and 'natural environment', negative impact upon 'economy B food production' and both positives and negatives associated with the factor 'infrastructure, pollution & waste'. The key difference between the SADMP and LPr assessment is the consideration of the new indicator 'climate change'. The score here is judged to be '#' as Marham has been identified as a sustainable location, however the design of the development overall and the individual homes will have an impact and this isn't 100% known at this point.

Marham - Sustainability Appraisal – Site Discussion

- Overall, the sustainability appraisal indicates that Site 2H041 would be potentially suitable for allocation given that it scores positively overall, it is relatively constraint free, and it is currently the only site which could potentially come forward and be developed at Marham.
- Site H219 was previously been considered for allocation as part of the SADMP process, and was considered to be a preferred option at the Preferred Option Stage, however at that time an additional site came forward which was considered more sustainable and therefore G56.1 was allocated by the SADMP. It was also a preferred option at the draft Local Plan review consultation stage (2019) however, Norfolk County Council as the local highway authority would object to the site being proposed for allocation.
- The Local Plan review’s growth strategy seeks to support Marham and its role in the local and national economy as it play’s home to RAF Marham. Accordingly, new homes are sought for allocation and Marham is classed as a Growth Key Rural Service Centre.
- The HELAA indicates that Site 2H041 could accommodate in the region of 35 dwellings, and the site has been proposed for 35 dwellings as part of the pre-application service offered by the Borough Council.

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Marham – Sustainability Appraisal – Site Conclusion

- The SADMP made a residential site allocation of G56.1 for at least 50 new homes. This site has come forward with a proposal to develop the site in phased approach. Given that this is a review of the plan, the Local Plan review seeks to carry forward this allocation as part of it.
- After careful consideration and on balance given that Site 2H041 scores positively overall, it would assist in achieving the Local Plan review’s growth strategy in supporting Marham and RAF Marham, and that is currently the only realistic site option, it is considered appropriate to propose the allocation of Site 2H2041 for at least 35 dwellings.

Policy Recommendations:

Amend the support text as follows:

Description

11.1.1 Marham is situated to the southeast of King's Lynn, and is almost equidistant between King's Lynn, Downham Market (to the southwest) and Swaffham (to the east). The settlement of Marham is spread over a large area, comprising both Marham village and RAF Marham. ~~A proportion of the village services and facilities are located on the RAF base but available for all residents to use, these include a school, GP surgery, bus routes, retail and employment uses.~~ A proportion of the village services and facilities are associated with the RAF BASE and some of these are available for residents to use. Services/ facilities include a school, GP surgery, bus routes, retail and employment uses. The Parish of Marham has a population of 3,531 (Census Data 2011).

RAF Marham is currently the largest operational front-line base of the RAF. It is has been designated the sole operating base for the Lightning II aircraft. It is the largest single-site employer in the Borough by a considerable margin, representing the equivalent of around 1 in 12 of employed jobs in the Borough. With dependants the RAF Marham 'community' is over 8,000 people; some living on the base itself and others in local towns and settlements. This figure is expected to rise, if the major role of the base is maintained, towards 10,000. Overall, the base is estimated to contribute in excess of £130 million per annum into the local economy through salaries and payments to local businesses. In turn the base community is a significant user of local services.

The old village of Marham has a linear form of development along 'The Street'. The village is distinct from the RAF base and with landmarks including The Church of the Holy Trinity and the Cistercian Abbey Ruins. The village-scape consists of mainly modern development, and there are views across from landscape from the edges of the village.

The combination of RAF Marham and the Village of Marham together ensure that the settlement is classed a Growth Key Rural Service Centre. Please see Policy LP09 for details of support for the RAF Marham.

The SADMP (2016) made an allocation for at least 50 dwellings (G56.1). The Local Plan review carries this forward. In addition, given the above, it makes a further allocation for at least another 35 dwellings.

MAR1 – Marham, Land south of The Street

Site Allocation

Policy MAR1 – Marham, Land south of The Street

Land of around 1.6 hectares to the south of The Street, as shown on the Policies Map, is allocated for residential development of at least 35 dwellings

Development will be subject to compliance with the following:

1. Subject to safe access being achieved to the satisfaction of Norfolk County Council as the local highway authority;
2. Submission of details showing sustainable drainage measures will integrate with the design of the development and the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for future management and maintenance of the SUDS should be included with submission;
3. Development will be subject to a programme of archaeological mitigatory work in accordance with National Planning Policy Framework para. 199
4. Provision of affordable housing in line with the current standards.

Site Description and Justification

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.

The Borough Council considers that the allocation of this site (SA/ HELAA Ref. 2H041/ Submission Ref. 29-04-20195110) through the Local Plan review would support Marham as Growth 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.

Access is envisaged to be gained from The Street, to the north, and the policy contains clause ensuring that this achieved to the satisfaction of Norfolk County Council as the local highway authority. They did not raise an objection to the site through the Housing and Economic Land Availability Assessment (HELAA) consultation.

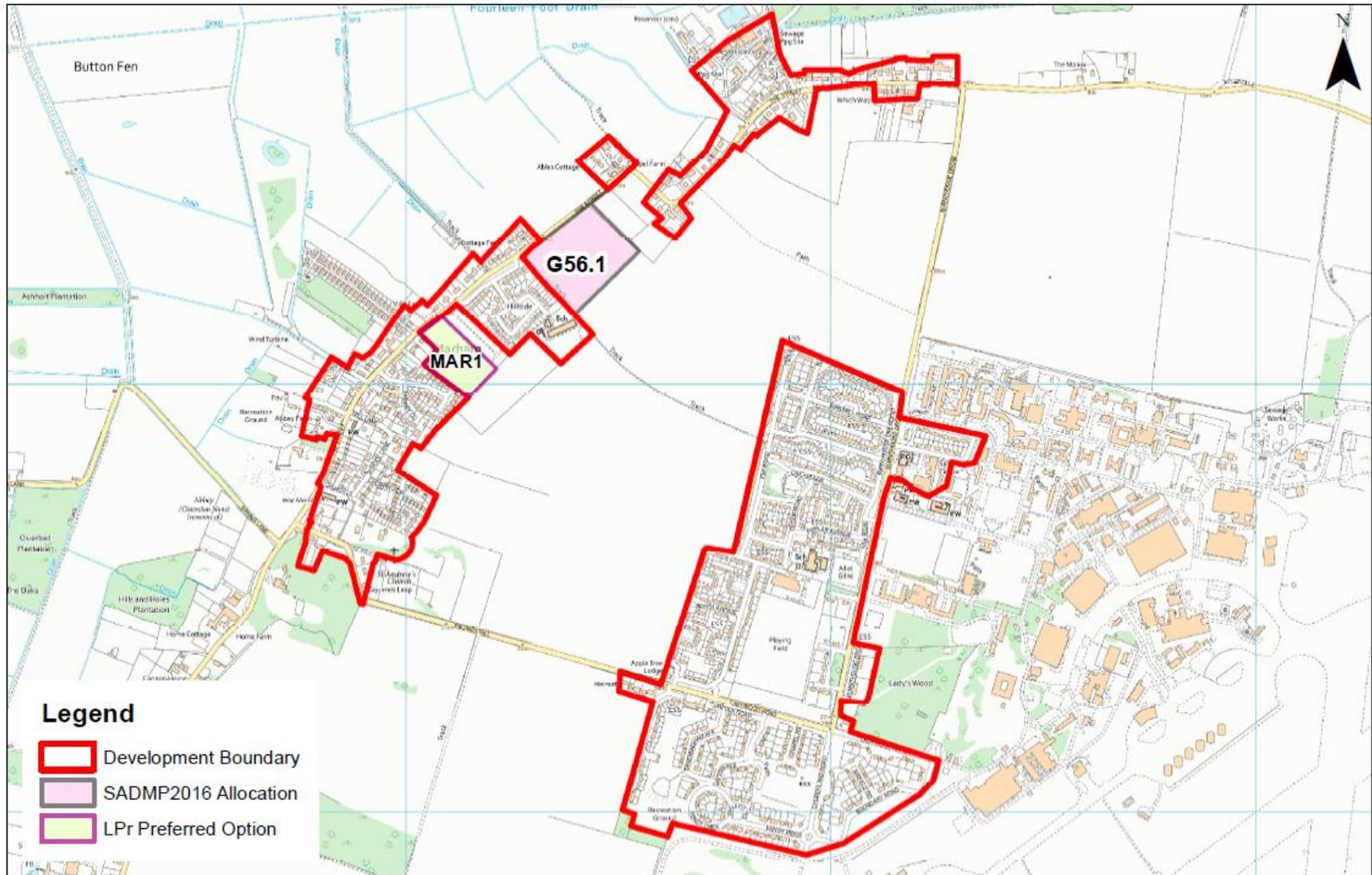
Norfolk Historic Environment Services (HES) state that the site lies between the 12th century parish Church of the Holy Trinity and Cistercian nunnery to the southwest and the cropmarks of a medieval moated site (perhaps a manorial centre) to the northwest. In addition, Prehistoric, Roman, Anglo-Saxon and medieval finds have been recovered from the surrounding fields including an Early Saxon brooch (perhaps indicating burials) to the east. Consequently, there is potential that heritage assets with archaeological interest (buried archaeological remains) will be present at the site and that their significance will be adversely affected by the proposed development. Therefore, in accordance with HES's advice item 3 appears in the policy above.

The site is classified as grade 3 agricultural land although this is a constraint upon the whole settlement which is either Grade 3 or 2. The site is at low risk from flooding, being located within Flood Zone 1.

The site is bordered by a combination of existing residential housing in an estate style layout/ ribbon development, a mobile home park, a cemetery and open countryside, however development of the site would be seen in the context of the existing built environment from either short distance views from the adjacent road/foot path network or limited longer distance views that may be possible from the road network and local footpaths. Consideration will need to be given to this context in any design scheme.

Development of this site 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

Development of this site would be well screened and as discussed would relate well to the village. The majority of views of the site are limited to the near distance from adjacent roads, properties and public rights of way. Medium and long-distance views from the wider landscape are possible from the north and east. However, in these views the site is seen in the context of the existing settlement.



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Marham

0 0.075 0.15 0.3 0.45 0.6
Kilometers

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Debbie Mack Historic England		See updated comments at: 978		No Action. Having read through the full comments, it isn't clear what these comments relate to.
Mr Michael Rayner CPRE	Object	Marham - unnecessary allocations due to existence of existing allocated sites and brownfield sites.	Remove site allocation	Noted. The housing numbers have been recalculated given changes to the NPPF and associated documents and the BC latest housing trajectory. This suggests a change in approach. It should be noted that sites on the BC's brownfield register predominantly have permission or are allocated so in essence the site owners could crack on.
J J Gallagher	Object	Please take this as my comment on the BCKL&WN Local Plan Review 2019. The BCKL&WN Local Plan Review 2019 Vision and Strategic Objectives highlights Marham as a Growth Key Rural Service Centre and the vision is, "Supporting growth at Marham, with the continued presence of a key employer in RAF Marham". It is also noted in Sect 3, Vision, "People want to be part of the success story that is West Norfolk, drawn here to live, work, invest and visit", and "West Norfolk enjoys an unparalleled balance between quality of life and quality of opportunity with people drawn to the area to take advantage of this." Also, at LP01 under		Noted. Consider Possible Implications. The comments mainly relate to the emerging Norfolk County Council Minerals and Waste Plan. It is suggested that the commenter joins in with that process. However, it should be noted that the

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		<p>Sustainable Development Locations, para 3 "In accommodating these priorities our approach will use the settlement hierarchy (set out in policy LP02) to ensure that: c. Locally appropriate levels of growth take place in selected Growth Key Rural Service Centres", and LP02 states "Growth Key Rural Services Centres - The two Growth Key Rural Service Centres have been identified as they are closely related to overall Growth Strategy in close proximity to A10 / Main rail line Growth Corridor which has been identified. They not only provide a range of services and facilities for the local population and wider rural areas, but have been identified as being capable of accommodating a higher level of growth than previously. In Watlington this is mainly due to the services and facilities present, which includes the railway station on the main line from King's Lynn to Cambridge / London King's Cross. At Marham the Borough Council wants to support RAF Marham, as one of the largest employers in the area, by providing further housing options for potential employees. These are all laudable visions and strategies ; however, they fail to address the Norfolk County Council (NCC) proposal to allow the development of the biggest silica sand quarry in the UK, SIL 02 (1000 acres), directly opposite the largest of the housing development sites in Marham. The proposed housing site, G56.1 The Street, is for at least 50 mixed dwellings on an uphill site and approximately 450m from the southern edge of the proposed site SIL 02. The landscape between the housing development and the proposed NCC quarry is open arable land. Taking the BCKL&WN Local Plan Review Vision and the policies LP 01 and 02, highlighted in the first para above, how can the Borough Council's plan possibly succeed if a 1000 acre quarry is allowed to be developed for 30+ years within 450 m of any planned dwelling development? Who would want to come and</p>		<p>NCC M&WP once adopted will form part of the Local Development Plan.</p>

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		live there? Why would any family settle their children next to a silica quarry? Why would anyone based at RAF Marham want to buy a property that they could neither sell nor rent out if they were posted away to another base? How does any of this point towards GROWTH STRATEGY? In summary, my comment is that the BCKL&WN Local Plan is following the National Planning Policy Guidance and the National Planning Policy Framework documents but is diametrically opposed to the NCC Mineral and Waste Local Plan (M&WLP) with respect to the proposed quarry SIL 02 at Marham. Therefore, what are the BCKL&WN doing/intending to do to oppose SIL 02 in the NCC M&WLP in order to support the Borough Council's own Visions and Strategies to promote growth in the identified Growth Key Rural Service Centre at Marham and support the Borough's largest employer by far?		
Mrs Inga-Lucy Barrett	Suggests amendment	This statement is factually incorrect. Facilities/amenities on the RAF base are not all available to local residents. Those that are, are not within easy walking distance of either of the proposed sites. Village amenities include a Monday -Saturday daytime bus service to Kings Lynn, a junior school, satellite GP surgery (already working at full capacity) and two fast food outlets. There is no shop nor Post Office in the village. There is no bus service to Narborough or Swaffham. At present there is very low demand for housing in this village with a large number of unsold properties already on the market. The possibility of a large area of adjoining farmland being quarried for silica sand in the future does not attract interested buyers.	See box to the left	Amend supporting text accordingly. Consider Possible Implications. Some comments mainly relate to the emerging Norfolk County Council Minerals and Waste Plan. It is suggested that the commenter joins in with that process. However, it should be noted that the NCC M&WP once adopted will form part of the Local Development Plan.
Mrs Sara Porter Marham Parish	Suggests amendment	The statement in 11.1.1. regarding village services and amenities is factually incorrect. The RAF facilities located on the Base are not	See box to the left	Amend supporting text accordingly.

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Council	nt	available for all residents to use. The outlets located outside the camp gate (Post Office store, library, cafe and hairdresser) are the only RAF amenities available to civilians. This statement must therefore be removed from the Local Plan or amended accordingly.		
Ms Svetlana Ignatieva	Object	The Local Plan is entirely inconsistent with the Norfolk County Council plans and Local Plan objectives are undeliverable given the contradicting objectives of NCC. Issues identified in the Sustainability Appraisal should be addressed prior to proceeding with more unsustainable development in the borough.		Noted. Consider potential Implications. Comments with regard to Marham mainly relate to the emerging Norfolk County Council Minerals and Waste Plan. It is suggested that the commenter joins in with that process. However, it should be noted that the NCC M&WP once adopted will form part of the Local Development Plan.
Mrs Sara Porter Marham Parish Council	Object	CPRE Pledge	Remove site allocations	Noted. See response the CPRE comments earlier
June Gwenneth Matthews	Support	Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base. The number of units proposed for allocation in Marham is very small for a	Make further allocations at Marham considering the base is one of the Borough's largest sources of employment.	Noted. The plan has sought to provide housing at Marham which has been identified as GKRSC, for reasons mentioned by the consultee.

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		<p>settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p> <p>The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
Judy Patricia Matthews Nana	Support	<p>Marham has been identified as a Growth Key Rural Service Centre due to its location, range of services and facilities and as it is capable of accommodating a higher level of growth, together with the expected increase of employment at RAF Marham. Section 11.1 clearly identifies the importance of the base to the economy of the Borough, and the UK as a whole. It is therefore evident that where there is such economic activity, housing needs to be provided for people working at the base, as well as in businesses whose services are utilised by the base.</p> <p>The number of units proposed for allocation in Marham is very small for a settlement that has been targeted for growth. Looking at the table in Section D of the Local Plan Review, which relates to the distribution of housing between settlements in the Rural Area, it is surprising to see that Marham is only being allocated 25 units in comparison to the 115 units proposed for allocation in the other Growth Key Rural Service Centre, Watlington. It is also noted that the settlements of Burnham Market and Terrington St. Clement, which are only Key Rural Service Centres, are proposed for more housing growth than Marham. The Local Plan Review as it stands does not therefore provide consistency between its vision and strategy, with the actual allocations proposed.</p> <p>The vision sets out support for the growth of the economy in a sustainable manner, ensuring growth of the Borough in a sustainable manner and</p>	Make further allocations at Marham considering the base is one of the Borough's largest sources of employment.	Noted. The plan has sought to provide housing at Marham which has been identified as GKRSC, for reasons mentioned by the consultee.

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		<p>focusing growth in sustainable settlements. The vision and objectives are therefore clearly directing housing growth towards sustainable settlements where there are employment opportunities. By providing further housing in Marham the economy will continue to grow in a sustainable manner, by providing people with homes close to the Borough's biggest single site employer, RAF Marham, reducing reliance on the car.</p>		
Mrs Dawn Flatt	Object	<p>Marham is a rural village with very few amenities of its own. The majority of amenities are on the nearby RAF Base and residents are allowed to access the shop and this is by an agreement. It has been muted that as this base is a significant UK base and now houses some very expensive new planes that the base should be secured therefore the residents of Marham will not be able to access these local amenities further if this does happen in the future. The GP surgery already has long waits for appointments. This rural community is already under threat from the Norfolk Minerals and waste local plan in particular proposed site SIL02 whereby Norfolk County Council are considering a huge 57 hectare quarry. Since the announcement of this in July 2018 the village which on average has approximately 5 homes for sale at any given time now has 17 houses for sale on right move. The housing market here is now stagnant and therefore any developer will struggle to sell homes. The quarry poses a health threat to local residents and this is widely known although seemingly overlooked by the council.</p> <p>Aside from the fact that the proposed homes will have an elevated position affording them a view of the proposed quarry they will also be in direct line for the sand that will be blown from this quarry therefore exposing the residents to complicated health issues.</p> <p>This site is on a hill and there is also an issue with flooding for the properties that will be directly opposite on the street. should these houses be built that will mean covering a large field with concrete, asphalt etc and thereby increasing flood risk to the properties already present. Amend the Local Plan Review to take into account the fact that in a rural community with next to none housing association properties, the residents of that community have purchased homes and chosen a rural way of life. Should they wish to live in a town, then as homeowners they are afforded with choice and they would be able to move to one.</p> <p>Look for alternative sites where the new residents will not be potentially exposed to health risks, current residents will not be at increased flood risk and local amenities more plentiful.</p>	Remove draft housing allocation at Marham	<p>Noted. Consider Possible Implications. Amend Plan accordingly. The comments mainly relate to the emerging Norfolk County Council Minerals and Waste Plan. It is suggested that the commenter joins in with that process. However, it should be noted that the NCC M&WP once adopted will form part of the Local Development Plan.</p>

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Mrs Sara Porter Marham Parish Council		The Parish Council does not object to 50 dwellings on this site, providing only that this is the maximum permitted. If the number were to be higher, the Parish Council would strongly oppose this. The document refers to the number of dwellings as being, 'at least', and therefore gives no prediction of the actual number of dwellings that could be developed on this site. There is an expectation that Local Councils are expected to be as transparent and open as possible; transparency and openness are fundamental principles behind everything Local Councils do. The words, 'at least', completely contradict this ideology and the statement is therefore ambiguous. The words 'at least' must be removed completely or replaced with the actual maximum number of dwellings that could be built on this site		Noted. No change. 'At Least' forms part of the policy. The SADMP inspector felt this was need and put this forward as a modification to the Plan in order for it meet the tests of soundness. It is required to ensure that the Borough Council has the best opportunity for meeting its local housing need. This added flexibility also guards against other sites potentially not come forward as envisaged at the time of the SADMP adoption for reasons unknown at the time. The SADMP pre-submission consultation, examination Inc. proposed modification consultation and subsequent adoption of the Plan was all carried out in a transept way. Please see Inspector's Report: https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_devel

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				opment management policies plan/367/examination
Ms Loreto Gallagher		<p>The following comments are in response to G56.1 in Borough of King's Lynn and West Norfolk, (BCKL&WN) Local Plan Review regarding proposed housing in Marham village. National Planning Policy Framework (NPPF) Pg 5 Sect 2 paras 7-10 achieving sustainable development including the social, economic and environmental objectives are planned for with BCKL&WN's local plan in relation to G56.1 and further; Dept for Housing Communities and Local Government (HCLG) and Chancellor Hammond's autumn statement identifies that there is a national need for good quality, affordable housing and has made monetary provision to do so. At least 50 of these homes mentioned above are planned in Marham village, however, Norfolk County Council's (NCCs) mineral and waste plan is juxtaposed to this national requirement for housing. The proposed quarry of 1000 acres, SIL02 at Marham is directly opposite the proposed site for the housing development in question (these homes will be on an elevated position looking directly down onto SIL 02). NCCs plan cannot fulfil para 8 b) to support a healthy community, with open spaces, social and cultural well being. It cannot support objective para 8 c) environmental, making effective use of the land, prudently. Nor can it fulfil NPPF, Sect 5 Pg 21 para 78 maintain vitality and for villages to thrive and grow; neither can it support the rural economy Sect 6 Pg 23 para 83 c). It does not take into account Sect 8 Pg 27 paras 91. a) - c), 92. a) or b) promoting healthy and safe communities; nor does it fulfil paras 96 and 98, open space and recreation. Again, NCCs plan is at odds with housing to meet the needs of the nation as the area of SIL02 is a flood risk 3 high risk area, which NPPF Sect 14 Pg 45 para 155 states development should be avoided in areas with flood risk; these nationally needed houses will be directly across from this proposed quarry with flood risk being high. The housing development put forward is also in response to the expansion of RAF Marham, strategically important for National Security for F35 aircraft, and is within BCKL&WN plan to cater for exactly those families who do or will work at RAF Marham. Why would any young person or family in the armed forces want to buy into an area that has the potential for the largest quarry in England? Not only from a health or environmental aspect but for economic reasons; if they needed to sell on posting, the resale value of a home near to a quarry would be severely damaged. They will not come, they will not</p>		<p>Noted. Consider Possible Implications. The comments mainly relate to the emerging Norfolk County Council Minerals and Waste Plan. It is suggested that the commenter joins in with that process. However, it should be noted that the NCC M&WP once adopted will form part of the Local Development Plan.</p>

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		stay, the village will not sustain nor thrive. In summary, surely National Security, the National need for housing and the wellbeing of the community of Marham village and that of our service personnel trump any reason given to quarry SIL 02.		
Norfolk County Council	Object	MAR1 - Marham - Land off School Lane Mill Lane, School Lane and Church road are all sub-standard. As Highways are looking at a new plan we would not like to see the site come forward and we are now placing significant emphasis on the ability to achieve safe pedestrian access to school which this site cannot. Therefore, it is considered that roads are narrow with no footways and a safe access, particularly pedestrian access, cannot be provided between the site and The Street. This is not a preferred site.	Remove the site from the plan going forward	Agree, Action: remove Site from Local Plan review moving forward. With specific reference to the proposed site, the comment from NCC would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared with the site owner for their consideration.
Brian Ferguson	Object	Raises highway safety concerns with access to the site and local highway network	Remove the proposed site from the Plan	Noted. See response to NCC above.
Brian Ferguson	Object	No employment/ amenity opportunities locally. Concerned that Marham doesn't fit with the overall growth strategy proposed. Concerned that the consultation took place mainly online		Noted. No Action. Marham It is a relatively short distance to the A10 and Downham Market. The RAF Base is one the largest direct and indirect employers within the Borough (and beyond). It is mainly for this reason the area of Marham

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				comprising the village and the RAF Base is considered a Growth Key Rural Service Centre. Consultation was carried out in accordance with the regulations. Press event was hosted and reported in local papers, drop in session were held at the three main towns, all documents available online.
Mrs Inga-Lucy Barrett	Object	The wording of 'at least 25 dwellings' does not show transparency in this consultation. This site was put forward in 2013 and dismissed from the plan. Since then there has been no change or improvement to road access or surface water drainage. Access via Church Lane or Mill Lane to School Lane is narrow and unlit. Of necessity, residents on these roads park on the roadside which further narrows the highway. There are no pavements on Mill Lane or School Lane and a only limited stretch of pavement on Church Lane. Parts of School Lane are often flooded with surface water after heavy rain. In the event that access to this proposed site is via Church View, all of these factors would still pose a problem. 'At least' 25 dwellings would generate at least a further 50 cars using these narrow approach roads. Church View itself is a 'dead end' small residential area where parking is already problematic. Off road parking is limited to 1 or at best 2 spaces per dwelling and many residents have to park at the roadside - often half on and half off pavements to ensure adequate access for other residents. This already poses problems for emergency vehicles needing to access dwellings on the estate. There is no mains drainage in Marham and thus any new dwellings would require septic tank or similar drainage. This site should be removed from the Local Plan Review on the grounds of poor/unsafe access, poor land drainage and overcrowding of a small plot which would adversely affect all residents of School Lane, Church Lane, Mill Lane, Church View and Lime Close	Remove the proposed site from the Plan	Noted. See response to NCC above.
Mrs Tina Hawkins		The statement in 11.1.1. regarding village services and amenities is	Remove the proposed	Noted & Amend. With

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		<p>factually incorrect. The RAF facilities located on the Base are not available for all residents to use. The outlets located outside the camp gate (Post Office store, library, cafe and hairdresser) are the only RAF amenities available to civilians. This statement must therefore be removed from the Local Plan or amended accordingly. The Road infrastructure is not suitable to accommodate more houses, School lane and mill lane do not have footpaths and this makes it very dangerous when walking along these roads, if more houses are built in this area this will mean even more cars and someone could get hurt or worse. The houses would be built on a hill and would cause flooding to the houses on School Lane.</p>	<p>site from the Plan & amend supporting text</p>	<p>specific reference to the proposed site, these comments echo those from NCC, and would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared with the site owner for their consideration. Amend supporting text with regard to services/facilities.</p>
Mr Alan Flatt	Object	<p>This proposed site is a small piece of land within an already populated area. There is limited access for 25 homes and associated vehicles. Access could only be gained in School Lane which is a narrow lane that constantly has cars parked along one side. I believe this would limit access for building traffic and certainly our current and new residents causing congestion and may well prove hazardous. The other option for access seems to be gained via Church View which would suffer in the same way as above. church view is situated in a small housing estate with narrow roads. During commuting times of the day the junction with School lane is extremely busy. There have already been collisions due to the layout and 'blind corners' on this estate I'm certain this will worsen.</p> <p>This small rural community is already under threat from the Norfolk Minerals and waste local plan. In particular the proposed site SIL02 whereby Norfolk County Council are considering a huge 57 hectare quarry. Since the announcement of this proposed mine in July 2018 the village (which on average has approximately 5 homes for sale at any given time) now has 17 houses for sale on right move. The housing market in Marham is now stagnant and therefore any developer will struggle to sell these proposed homes. The quarry poses a health threat to local residents and this is widely known although seemingly overlooked by the council.</p> <p>In addition and should be taken into account as relevant Marham is a small rural village with very few amenities of its own. The majority of amenities</p>	<p>Should this proposal go ahead I feel access should be gained by purchasing a strip of land to enable residents to gain access via squires hill.</p>	<p>Noted, Consider & Amend. Plan to be amended in terms of services/facilities at Marham. Access and Highway issues have been raised by NCC the landowner is aware it will be them to consider possible solutions. Potential implications from the NCC Waste mineral Plan will need to be considered.</p>

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		are on the nearby RAF Base and residents are allowed to access the shop and this is by an agreement. It has been noted that as this base is a significant UK base and now houses some very expensive new planes that the base should be secured therefore the residents of Marham will not be able to access these local amenities further if this proceed.		
MISS BETHANY PALFREY	Object	I believe the plans for the development for at least 25 dwellings should be disregarded AGAIN because the reasons for this plan being rejected and dismissed before have still not been rectified in order for this to go forward. The roads still flood, there are still not footpaths and there is no street lighting. Since this plan was previously rejected, the congestion and parking has increased and worsened. The Access for both School Lane and Church View is limited STILL as this has not changed since it was rejected before. There is no mains drainage in this area which will cause disruption for installing access to what we do have for this development This was a ridiculous plan before and that has not changed.	Remove the proposed site from the Plan	Noted & Amend. With specific reference to the proposed site, these comments echo those from NCC, and would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared with the site owner for their consideration
MR Leigh Markwell	Object	We oppose the MAR1 development on the ground that vehicle access is poor with congestion and parked cars in church lane, church view and school lane before adding atleast 25 dwellings. School lane regularly floods and has no footpaths or street lighting and adding additional vehicles in this area would increase the likelihood of an accident. I believe this development should be rejected AGAIN.	Remove the proposed site from the Plan	Noted & Amend. With specific reference to the proposed site, these comments echo those from NCC, and would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared with the site owner for their consideration
Mrs Sara Porter	Object	1. During the last consultation review, the Parish Council opposed 25 dwellings on this site and remains opposed, particularly when the number	Remove the proposed site from the Plan	Noted. Amend Plan accordingly. This suggests

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		<p>could now be potentially higher. The document refers to the number of dwellings as being, 'at least', and therefore gives no prediction of the actual number of dwellings that could be developed on this site. There is an expectation that Local Councils are expected to be as transparent and open as possible; transparency and openness are fundamental principles behind everything Local Councils do. The words, 'at least', completely contradict this ideology and the statement is therefore ambiguous. The words 'at least' must be removed completely or replaced with the actual maximum number of dwellings that could be built on this site.</p> <p>2. During the last consultation, this site was discarded from the Local Plan due to drainage and access issues, so the Council is astonished to see that it is now being considered again.</p> <p>3. It is considered that 25 dwellings would create a cramped form of development and represent an over-intensive use of the site and would be unsympathetic to, and out of character with, the existing adjacent developments.</p> <p>4. The proposal still does not provide safe vehicular access to or from the surrounding public highway network. The highway infrastructure on Church View, School Lane, Mill Lane and Church Lane is very poor with no footpaths for pedestrians who walk along these roads.</p> <p>5. Under the National Planning Policy Framework all developments should be undertaken in a sustainable manner and under the National Standards for Sustainable Drainage Systems (December 2011). Marham is not connected to a mains drainage system so a further large development in this area could potentially lead to flooding and/or other associated problems for neighbouring properties, in particular for those located in School Lane.</p> <p>6. The proposed development would create an adverse impact upon the residential amenities of neighbouring properties by virtue of the physical relationship between buildings and is considered to be contrary to advice contained within the National Planning Policy Framework for Delivering Sustainable Development.</p>		<p>a change in approach. More growth may be considered in future plans. With specific reference to the proposed site, these comments echo those from NCC, and would make it more difficult for the site to come forward as envisaged by the draft plan. The issues raised by NCC have been shared with the site owner for their consideration 'At Least' forms part of the policy. The SADMP inspector felt this was need and put this forward as a modification to the Plan in order for it meet the tests of soundness. It is required to ensure that the Borough Council has the best opportunity for meeting its local housing need. This added flexibility also guards against other sites potentially not come forward as envisaged at the time of the SADMP</p>

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				adoption for reasons unknown at the time. The SADMP pre-submission consultation, examination Inc. proposed modification consultation and subsequent adoption of the Plan was all carried out in a transept way. Please see Inspector's Report: https://www.west-norfolk.gov.uk/info/20220/site_allocations_and_development_management_policies_plan/367/examination
Mrs Dawn Flatt	Object	<p>This proposed site is a small pocket of land within an already populated area. Currently access can only be gained by either School Lane which is a narrow and has cars parked along one side constantly therefore access for building traffic let alone current and new residents would in my opinion be hazardous. The other option for access via Church View would suffer in the same way as above. This is a small but busy housing estate and during commuting times of the day and there have already been collisions due to the layout and 'blind corners' surely this can only increase?</p> <p>I am attaching a document showing the obvious points of access and there unsuitability. Marham is a rural village with very few amenities of its own and in either of the proposed site there does not appear to be provisions made for amenities. The majority of available amenities are on the nearby RAF Base and residents are allowed to access the shop and this is by an unwritten agreement. It has been muted that as this base is a significant UK base and now houses some very expensive new planes that the base should be secured therefore the residents of Marham Village will not be able to access these local amenities further should this happen in the future. This community is already under threat from the Norfolk Minerals and waste local plan in particular proposed site SIL02 whereby Norfolk</p>	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

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		<p>County Council are considering a huge 57 hectare quarry. Since the announcement of this in July 2018 the village which on average has approximately 5 homes for sale at any given time now has 17 houses for sale on Right Move. The housing market here is now stagnant and therefore any developer will struggle to sell homes. The quarry also poses a health threat to local residents and this is widely known although seemingly overlooked by the council also adding to the unsalability of the proposed dwellings.</p> <ol style="list-style-type: none"> 1. This site has been proposed and rejected previously. 2. With regard to changes to the plan: I'm not sure whether purchasing neighbouring farm land and building an access road out to Squires Hill (a main road more able to accommodate the building traffic and resident traffic) has been considered as with regard to access this would surely be a preferable solution for access should this proposal go ahead? 3. There is a stagnant housing market in this area therefore these houses will join an already flooded market. 4. This proposal has not taken into account a grace and favour arrangement with regard to amenities nor a health risk from the proposed quarry and doesn't appear to benefit anyone except the developers and council who wish to comply with a national directive. 		
Mr David Bignell	object	<p>The existing estate (Lime Close and Church view) was established circa 30 years ago, and School lane many decades earlier, with off road parking and road structure deemed suitable for the household / car ratio at that time. Department of Transport states an increase of 16.9% from 1997 to 2016, and forecast traffic demand and congestion in England set to increase by between 11% and 48% up to the year 2050. This increase in cars per household in the area local to the planned site has already outgrown the supporting infrastructure and this is clearly evidenced by the lack of off road parking where families are forced to park along existing roads. The planned access and egress for the additional 25 properties is through either School Lane or Church View where the roads and parking already do not support the current level of parking and traffic, and where the UK Gov is forecasting further significant increases. I have personally witnessed 3 vehicle accidents very recently.</p> <p>Safe movement of cars and people in the direct area of the planned site must be a prime consideration for responsible planning, and the current structure and access routes do not support the existing vehicles, and certainly do not support the inevitable overload inherent with the additional 25 properties.</p>	Plan responsibly for an alternative site, designed to cater for the existing and forecast number of vehicles.	Noted & Amend. Please see conclusion

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		<p>The access road through Church view has already poor parking facilities where the home owners park on the intended access road, not through choice, but because they have no alternative.</p> <p>In addition the road structure does not support safe access and egress as the angles for turning are very limited with poor visibility, exacerbated by vehicles parked along the roadsides. This would be simply planning traffic accidents and compromising the safety of he local road users and pedestrians, where responsible planning has an opportunity to build infrastructure aligned with current vehicle numbers while catering for future increase in a more appropriate site.</p> <p>I have attached photographs to evidence the above, and existing strain on safe parking and vehicle movement in the area directly adjacent to the planned site.</p>		
Miss Rachel Bignell	Objects	<p>I believe access alone is enough to disregard this proposal. Access of both Church View and School Lane is not amenable, both roads currently struggle with existing residents both in passing and with vehicles being parked. The proposed access off Church View passes past residential properties causing possible obstruction to property access and is also almost a blind junction to drive from, having been near collisions here before. Not to mention the new properties encroaching on current residents privacy, rear windows and gardens etc. There is also the increase in non absorbent surface area, School Lane all the way down to the street often floods as it is! Let alone if this paddock was to be laid to roadways making it easier for rain fall to make it's way down flooding peoples properties! This isn't the first time this proposal has been made, previously being turned down. The property market within Marham village is very stagnant, as anyone can see from looking on the market properties are not selling or letting, this is something else to be taken into account. You can build a property but it doesn't mean someone will buy it, then there will just be a field of empty houses and angry residents surrounding it. Doesn't sound ideal does it?</p>	I want it totally disregarded and rejected.	Noted & Amend. Please see conclusion
Mr Dave Hawkins	Objects	<p>The statement in 11.1.1. regarding village services and amenities is factually incorrect. The RAF facilities located on the Base are not available for all residents to use. The outlets located outside the camp gate (Post Office store, library, cafe and hairdresser) are the only RAF amenities available to civilians. All other amenities are for serving persons and families only. This statement must therefore be removed from the Local Plan or amended accordingly. The Road infrastructure is not suitable to accommodate more houses, School lane and mill lane do not have</p>	Mar1 is not a suitable area for more houses due to the 2 estates already built in this area, as stated above no footpaths and will cause	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>footpaths and this makes it very dangerous when walking along these roads. The houses would be built on a hill and would cause flooding to the houses on School Lane. Some of the houses on School Lane and the street already suffer from flooding and building more houses in the area would make it worse. There is also a flood risk to Mill Lane/School Lane and the properties</p>	<p>flooding. G56.1 jus a much more suitable area, there is more space, the entrance/ exit will be onto the main Street, parking for the School has been offered this would be a huge help to the School as parking is a huge problem and it would be safer for the school children</p>	
Mrs Jane Bradley	Objects	<p>I have grave concerns about the proposed building of 25+ houses on the above site. My reasons are as follows:</p> <p>1) Marham village has a history reaching back many hundreds of years. It is a linear settlement, the proposed site being situated close to the oldest part of the village where the church is located and also the ruins of an ancient abbey. We have, in recent years, had a development of 14 houses on the site of our last village pub, opposite the church. A development of the size proposed would be make this end of the village far too congested and completely out of character with a village of this nature ie. it would not "relate well to the village".</p> <p>2) The proposed development would only be able to be accessed via Mill Lane or Church View leading into School Lane and Church Lane. The clue here is in the word 'lane' – "a narrow passage or road". The majority of these thoroughfares are extremely narrow and are without footpaths; most are single lane due to the fact that the majority of houses/bungalows have no garages , so vehicles are parked on the roadside. There is already a considerable amount of traffic with two right-angled bends to negotiate, so a further 25-50 vehicles would be completely unviable.</p> <p>3) Sadly, wildlife is diminishing in so many areas. It has been very noticeable since moving here 29 years ago, how the bird population in particular has decreased dramatically. The open spaces around here also support many mammals, insects etc and to lose yet another green area for</p>	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>these creatures would be devastating to their numbers.</p> <p>4) At present, there are a considerable number of houses for sale in the village, many of which have been on the market for many months. Properties are not selling and one can presume that this is due to the proposed silica sand quarry, which, if it goes ahead, would be the largest in the whole of the UK. Who would invest in a property near to such a monstrosity causing a risk to health, clouds of dust, incessant noise and endless HGV on our local roads?</p> <p>5) At present, there are very few facilities in the village, no shop, no pub, little transport and, importantly, a doctor's surgery where it is becoming increasingly difficult to get an appointment due to an increased village population. Few of the facilities at RAF Marham are available to the villagers. Adding a further 25+ houses, plus the proposed 50 houses on site G56 to the equation will only severely add to the problem.</p> <p>6) The bungalows opposite the end of Mill Lane already experience drainage problems with water cascading down the lane due to insufficient drainage. A further development of 25+ houses would add significantly to this problem.</p>		
mrs Suzanne Bignel	Objects	<p>I object to the proposed development of 25 houses on the existing paddock off School Lane. Access to be gained via Church View or School Lane is not viable.</p> <p>Church View has at present a small dead end road which would be used to enter the area. Currently it is used as valuable parking as the whole estate next to the proposed site already has a big issue with the lack of parking. Church View and Lime Close is already squeezed to capacity with vehicles and parking and visibility on these roads is already a problem. The proposed access road is very narrow with houses either side and could only be made wider if the pavements were removed thus leaving the pedestrian lane down to School Lane inaccessible. School Lane access would also be an issue as a number of properties only have off road parking making it single lane traffic only. Also there are no pavements in School Lane and the increase of traffic would be a real concern to local children walking to the village school or down to catch the bus for the high school. Frequent events held at the village hall add to the parking problem as this often overflows into School Lane and Church view as do funerals, weddings etc held in the church as it has no designated parking. The paddock proposed for these 25 houses is just too inaccessible to cope with the infrastructure needed to build these homes, and the increase and</p>	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>volume of traffic would be detrimental to all living in the area. What amenities are intended to be put in place to deal with the influx of people ? We have no village shop, the nearest shop is in Upper Marham and quite a trek if you are elderly or unable to walk any great distance which means using a car. The bus service is ok if you only want to go to Kings Lynn and the doctors surgery is struggling now, getting an appointment is difficult and with an extra 50+ dwellings proposed on land off The Street this village is at bursting point.</p>		
Mr Nathan Yates	Objects	<p>I have considerable concerns and objections over this proposed development site.</p> <p>Firstly is the access road network to the site. The current road network that would link it to the main street is not adequate enough to handle the current flow of vehicles in and out the existing estates. School lane does not have any public footpath at all and very little street lighting. Church view is a quiet cul-de-sac where children can safely play without fear of their well-being from through traffic to the new proposed estate.</p> <p>Next is the current drainage system for the existing estate is owned by the current residents who employ First Port Property Services to manage on their behalf collectively, and without seeking our permissions to further expand this network I don't see how you can achieve adequate additional drainage without either building a second waste site or breaching into the main sewers on Marham's main street.</p> <p>In reference to paragraph 11.1.2.4, If 25 extra dwellings were to be constructed at this site I would argue that this would create a greatly more overcrowded development to which this site could not possibly handle, as from the supporting map, the outlined area set aside is far smaller than that of the existing estate which is of around 30 properties. As currently the existing properties that back onto the marked development plot, there is no way further properties could be built without overlooking those already there without breaching their privacy.</p> <p>It also states that the area for development is close to the centre of the village to which I disagree with completely, as it is at the extreme end of the village and is not located near any amenities such as shops, garage or post office as they are approximately 1 Km away located at RAF Marham.</p> <p>With regards to creating biodiversity I can not see how by urbanising the land that this would be possible. This land is home to many wildlife species as it is, including birds, small mammals, insects, and at least two families of deer are living within this site area and have been for as long as I have lived on this estate (photographic evidence of this can be supplied), and by</p>	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>developing this land this would remove the wildlife completely. For years now the parish council have lobbied better broadband for Norfolk to create a fit for purpose communications network for Marham village. This is something that is only now starting to happen, and will still only provide a very limited number of improvements to the already stretched communication exchange. Any extra demand in this area would put most properties at this end of the village (furthest point away from the exchange located in nearby Narborough, and majority of the exchange capacity taken up by the RAF Airbase) back to square one with regards to the broadband internet speeds expected for a property of this day and age.</p>		
Mr Paul Sawyer	Object	<p>I wish to make the following comments about the proposed development on this site.</p> <ol style="list-style-type: none"> 1. The site is considered to be close to the centre of the settlement, but in reality it would be making this end of the village even more heavily developed compared to the rest. 2. The planned development will have an impact on local people over a long period of time and building on this agricultural land will affect views of the countryside. 3. The building of such a large number of dwellings is going to have an impact on utilities; Church view and Lime Close, are on a communal sewage system and what effect will extra housing have on our drinking water supply, has this been factored in to the plan? 4. As a former telephone engineer I am aware that there is no spare capacity to cater for further development. 5. The plan is selling the idea that it would help support local amenities, but with RAF Marham close by, I do not consider this to be a valid reason. 6. RAF Marham is not short of accommodation for its' staff as there are a large number of empty Families Married Quarters. 7. Neither School Lane or Church View are suitable to carry the extra traffic that will come as a result of further development. School lane is in a very poor state of repair with no pedestrian walkway or street lighting to speak of. 8. The short dead end road off Church view is only serving two houses and currently used as a parking area for the two dwelling,s with parking at a premium in Church View, this will only increase the amount of pavement parking. 9. The visibility of Church View from the above mentioned road, is restricted by the corner properties and I have come close to being knocked off my push bike and motorcycle on several occasions. This is with it 	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>serving just two properties a further twenty five will increase this risk considerably.</p> <p>10. Developing this site will have an impact on rain water run off and could affect properties at the bottom of the hill.</p>		
Ms Janet Qualters	Objects	<p>I have some serious concerns relating to the announcement details of the Borough Councils local Plan Review with regards to 50 new homes in Marham near the Chinese Restaurant, but more importantly the 25 new homes at the top of Mill Lane on the existing paddock off School Lane. I already have an enormous problem with excess water coming off the highways (which as you know is illegal) and coming down Mill Lane like a river and into my driveway. The water can reach at least 18 inches against my front door and can be at least six feet in width across the whole of my property.</p> <p>Regarding this situation in the Local Plan Review, with 25 homes further reducing the surface area for water drainage thus potentially resulting in more surface water finding its way onto the highway, and ultimately onto your driveway. We already have huge drainage problems, and this further development would exacerbate the problem even further.</p> <p>The current situation with the drainage in the area of my bungalow and around that area needs to be rectified before any further houses can be built.</p> <p>This is an ongoing problem which the Flood Department are fully aware of and are looking into, but more houses to make matters worse is not a situation which can be acceptable.</p>	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion
Mr and Mrs John Sadler	Objects	<p>Both the Wife and I wish to object to the proposal to build 25 New Houses on the Paddocks for the following reasons :-</p> <ol style="list-style-type: none"> 1. At the last consultation this site was discarded due to drainage and access issues. 2. 25 dwellings or more would create a cramped development and represent an over intensive use of the site and would be unsympathetic to , and out of character with the existing adjacent developments. 3. The proposal still does not provide safe vehicle access to or from the surroundings public highway network. The highway infrastructure on Church View, School Lane, Mill Lane and Church Lane is very poor with no footpaths for pedestrians to walk along these roads. 4. Marham is not connected to a mains drainage system so a further large development in this area could potentially lead to flooding and/or other associated problems for neighbouring properties, in particular for those located in School Lane. 	Remove the proposed site from the Plan	Noted & Amend. Please see conclusion

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>5. The proposed development would create an adverse impact upon the residential amenities of neighbouring properties by virtue of the physical relationship between buildings and is contrary to advice contained within the National Planning Policy Framework for Delivering Sustainable Development.</p> <p>6. There is already plenty of house for sale in the village.</p>		

Appendix 2: Indicative Layout Site 2H041



Consideration of responses to the draft Local Plan review consultation (2019), and recommendations for Submission Local Plan review (2016 -2036)

Watlington

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1. Draft Policies – Watlington

The links provided below are to the draft policies consulted upon and the comments in full received from the draft consultation stage:

GKRSC: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759463#section-s1542882759463>

Watlington: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759465#section-s1542882759465>

G112.1 – Watlington – Land south of Thieves Bridge Road: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545132236837#section-s1545132236837>

WAT1 - Watlington - Land to east of Downham Road and west of Mill Road: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545132352638#section-s1545132352638>

2. Summary of Responses and the Issues Raised:

The Watlington Chapter of the Local Plan review drew by far the most amount of comment, within the region of 140 representations received. Most made similar points. Some of those representations were in the form of individual submissions, and some were in the form of duplicate/template letter or email that had been circulated by those campaigning around the proposed draft allocation. These are all available to view, in full, via the links provided above.

The comments have been split for ease into the following: Appendix 1 which lists all the points raised by members of the local community through the 130+ representations received in objection to the proposed draft allocation WAT1. This identifies individual arguments or points made in those representations, while seeking to avoid repetition. In most cases there were a number of people (often very many) making the same, or a very similar, point. Listing them in this way enables Members to see both the specific points made in response, and the range of issues raised.

And; Appendix 2 which provides a summary of 12 representations received which related to Watlington but not specifically WAT1.

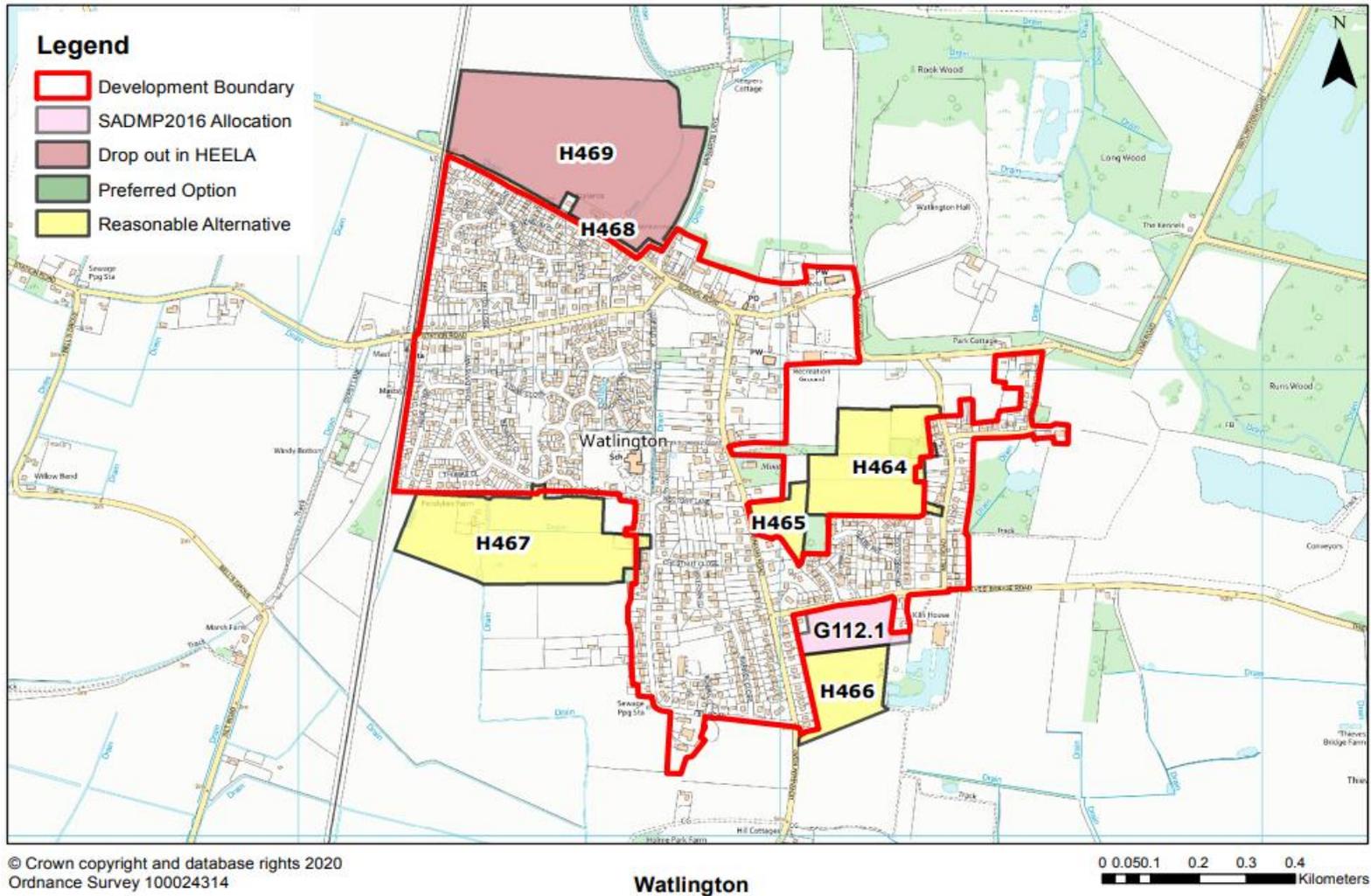
It is clear from the many responses received to the consultation, and the specific points they raise, that the local community value the proposed site for what the majority is currently, a mature openly accessible green space located relatively central within the village with an abundance of wildlife/nature.

3. Conclusions & Recommendation

- Given the points raised and the number of comments received in objection to the proposed site the recommendation is to no longer continue to propose Site WAT1 for allocation through the Local Plan review.
- Whilst a number of reasonable alternatives exist, and three further sites have been put forward through the consultation for consideration, the recommendation is not to pursue these through the Local Plan review as Watlington Parish Council and the local community have indicated that will commence preparation of a Neighbourhood Plan for their area. With the Area being formally designated 05/03/2020 by the Borough Council.
- Although, as discussed elsewhere in relation to the Local Housing Need, Strategic Direction of Growth and the Settlement Hierarchy, Watlington remains a Growth Key Rural Service Centre therefore it would be appropriate for Neighbourhood Plan to investigate those sites which have been put forward through the Local Plan review process, and potentially others, and consider making a new allocations for homes.
- The Borough Council should support Watlington Parish Council (and their steering group) in the preparation of their Neighbourhood Plan.
- The Local Plan review be amended to reflect the position outlined above.

Watlington - Sustainability Appraisal – Map

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Watlington – Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr G112.1	++	+	O	xx	+	O	+	#	O	#	+/x
SADMP G112.1	+	+	O	xx	+	O	#	#	O	xx	n/a
H464	++	xx	+	xx	+	#	+	x/#	x	#	+/x
H465	++	xx	+	xx	+	#	+	x/#	x	#	+/x
H464 & H465	++	xx	+	xx	+	#	+	x/#	x	#	+/x
H466	++	+	+	xx	+	o	+	#	o	#	+/x
H467	++	+	+	xx	x/xx	o	x/#	#	o	#	+/x

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KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Watlington- Sustainability Appraisal – Site Commentary

H464 (23-11-20162122) – The Sustainability Appraisal shows the site is well related to the services available at Watlington. This includes the primary school, health care centre, village shop, public house, village hall, social club, church and train station. As with all of the sites proposed development of this site would lead to the loss of high-grade agricultural land, in this case Grade 2 & Grade 3. It is noted that the site has been last used as paddock and pasture land, according to the site promoters. The site is located within Flood Zone 1 (low risk) of the BCKLWN SFA, NCC as the LLFA consider that there are relatively few to no constraints and accordingly standard information would be required at the planning application stage.

Whilst there are no designated heritage assets within the site, there are several listed buildings nearby. These include the Grade I listed Church of St Paul and Peter and a Grade II listed Manor House to the north, along with a Grade II listed house to the west. The Church is prominently positioned and so development of this site will need to be sensitively considered. Historic England advise that a site-specific heritage impact assessment is undertaken so the impacts upon the historic environment and the setting of these assets can be better understood.

Part of this site was subject to a planning application, for 40 dwellings, which was granted subject to the completion of a S106 agreement. However, this was not completed within the given timescales (15/01575/OM). NCC as the local highway authority state that they did not consider that they could substantiate a highway recommendation for refusal to the proposed development off Mill Road with some minor improvements to the south. However, they consider that the highway network to the north would remain sub-standard; it would be their view that the site should not be allocated when there are other sites elsewhere in Watlington that they could support. However, if this site was brought forward in conjunction with Site H465 (25-11-2016040) with an access from Downham Road, it would be considered more favourably.

Development of this site would extend the settlement into an area classed as countryside. To the south and east are existing residential developments in either ribbon or small estate / cul-de-sac arrangements. To the north are the village hall / social club and playing fields. To the west is ribbon development along Downham Road. There are a number of TPO's and TPO areas close to or bordering the site, careful consideration of these will be required in the design of any scheme. There is a Public Right of Way (Watlington Foot Path 6) that crosses through the site, which should be incorporated within any scheme and could encourage future residents to walk to local facilities rather than rely upon a car. Sites H464 and H465 were the proposed option for housing for Watlington in the draft version of the Local Plan review. However due to the change in housing numbers required and the number/nature of the objections received at the consultation stage it is now proposed not to continue with the allocation of this site through the Local Plan review. Over 130 objections were made by the local community (including the parish council) making this the most commented section of the draft Local Plan review. Whilst the scheme has the potential to deliver some benefits such as affordable housing this would unlikely outweigh the public opposition. Key reasons for opposition include the loss of green space at the centre of the village which is currently a wildlife/biodiversity haven and it enables the public to interact with nature. Hence the negative scores for 'community & social', 'landscape & amenity' and 'natural environment'. It is our view that the scores would be the same for each site as well as together given their close proximity and shared characteristics.

H465 (25-11-20161040) – In comparison to other sites on offer at Watlington, the site scores well. The site is located adjacent to Site H464 (23-11-20162122) and therefore scores for many of the sustainability factors are similar, with exception of 'Highways and Transport' which NCC state that access could be achieved from Downham Road. The site also scores more favourably in the 'Landscape' category as it wouldn't intrude as much into the countryside and could be seen more as infill. Development here would therefore not appear incongruous with the settlement pattern at this locality. The flood risk is the same, being in Flood Zone 1

and again NCC as the LLFA consider that there are relatively few to no constraints and accordingly standard information would be required at the planning application stage. The Impact upon 'Heritage' is considered to be similar as development of this site is likely to impact upon the listed buildings and their setting. Historic England advises that any development of this site will need to preserve the listed buildings and their settings. They believe that this could be achieved through mitigation measures such as appropriate design, massing landscaping/planting and setting the development back from the listed buildings.

Sites H464 and H465 were the proposed option for housing for Watlington in the draft version of the Local Plan review. However due to the change in housing numbers required and the number/nature of the objections received at the consultation stage it is now proposed not to continue with the allocation of this site through the Local Plan review. Over 130 objections were made by the local community (including the parish council) making this the most commented section of the draft Local Plan review. Whilst the scheme has the potential to deliver some benefits such as affordable housing this would unlikely outweigh the public opposition. Key reasons for opposition include the loss of green space at the centre of the village which is currently a wildlife/biodiversity haven and it enables the public to interact with nature. Hence the negative scores for 'community & social', 'landscape & amenity' and 'natural environment'. It is our view that the scores would be the same for each site as well as together given their close proximity and shared characteristics

H464 (23-11-20162122) & H465 (25-11-20161040) – The site was the proposed option for housing for Watlington in the draft version of the Local Plan review. However due to the change in housing numbers required and the number/nature of the objections received at the consultation stage it is now proposed not to continue with the allocation of this site through the Local Plan review. Over 130 objections were made by the local community (including the parish council) making this the most commented section of the draft Local Plan review. Whilst the scheme has the potential to deliver some benefits such as affordable housing this would unlikely outweigh the public opposition. Key reasons for opposition include the loss of green space at the centre of the village which is currently a wildlife/biodiversity haven and it enables the public to interact with nature. Hence the negative scores for 'community & social', 'landscape & amenity' and 'natural environment'.

These two sites are next to each other and therefore score similarly in the appraisal. NCC Highway Authority indicate a preference, should the two sites come forward together, with access from Downham Road. As stated, part of Site H464 was the subject of planning application for 40 dwellings, this detailed an access off Mill Road which was considered acceptable. So, there is the potential for two access points to be created to serve the site should the two come forward as one comprehensive site. It is believed that any potential impact on the functioning of local roads could be reasonably mitigated. The site is well located in terms of the services and facilities on offer within the village, albeit a short distance from the train station. The site is located within Flood Zone 1 (low risk). There is an existing footpath which travels through the site (east – west) this provides a pedestrian link to Mill Road, Downham Road and

Church Road, this should be incorporated within any design and potentially upgraded. The foot path also links to Route 11 of the National Cycle Network which runs close to the site. If the site was to come forward regard would have to be given to the historic environment, Historic England (HE) advise that any development would need preserve the listed buildings and their settings. Accordingly, mitigation measures would be required as would a heritage impact assessment (HIA) which establishes that development will enhance and preserve the listed buildings and their settings. HE advises that the HIA is carried out in advance of allocation. Please see H464 & H465 for further details.

H466 (28-11-20166553) – In comparison to other sites on offer at Watlington, the site scores well. The site is immediately to the south of the site allocated via the SADMP, G112.1. The site is still within reasonable distance to the facilities and services on offer in Watlington, including the health centre and primary school. Access to the site is envisaged through the G112.1 and taken from Thieves Bridge Road. NCC as the local highway authority made no objections to the site subject to the delivery of a safe access; it is believed that any potential impact on the functioning of local roads could be reasonably mitigated. The site is at a low risk to flooding being in Flood Zone 1 of the BCKLWN SFRA, the LLFA state there are relatively few or no constraints, and that standard information would be required at the planning application stage. As mentioned to the north is the SADMP allocation, to east is mainly countryside, to the south is open countryside, and to the west is established housing in a ribbon pattern along Downham Road. Given the site edges would either be next to open countryside, existing housing or future housing, suitable landscaping and boundary treatments would be required. Given the distance of the site from historic assets in relation to some other sites it is considered that there would be a neutral impact upon the historic environment. The site promoters have stated that the site is in current agricultural use, the site is classed as Grade 2 Agricultural Land however this is constraint of the settlement.

H467 (28-11-20169043) - This site is located in the south west of the settlement. To north of the site is the primary school and a large built up area of residential housing in estate style arrangements. To the east is also residential housing of a slightly older style and arrangement, to the south is open countryside and to the immediate west is the railway line with countryside beyond this. Like other site options H467 scores well for access to services and it is also believed to have a neutral impact upon the historic environment, however overall, in comparison to the other site options it scores poorly. This is due to flood risk, access and the local road network. In terms of flood risk a proportion (approx. 40%) of the site is in Flood Zone 3a and Flood Zone 2 (high risk) of the emerging BCKLWN SFRA (2017). On the 2009 BCKLWN SFRA approx. 30% of the site is within Flood Zone 2. NCC LLFA having reviewed the EA maps state that a large proportion of the site is in Flood Zone 3, and some in Flood Zone 2, they consider that significant mitigation would be required and significant information would need to be provided at the planning stage. There are site options available which are at less of a risk of flooding being within Flood Zone 1, although it is acknowledged that the housing element of the development could be provided on the portion of the site located within Flood Zone 1.

NCC as the local highway authority considers that that some development here if accessed from John Davis Way would be acceptable. If, however, a larger development was considered two access points would be needed but they consider Fen Road to be substandard and with no footpath so therefore the allocation

of this site would not be supported. They continue to say that as there is already a significant amount of development off a single point of access (John Davis Way), some development of between 10 -20 houses may be considered acceptable.

The site is therefore constrained by flooding issues, access/local road network issues and whilst may be acceptable for a small development, it may be that the number of houses which could potentially achieved here are better located at a less constrained and therefore larger site which could meet the aspiration of the growth strategy.

SADMP Allocation

G112.1 – This site is allocated by the SADMP for a residential development of at least 32 dwellings. It has been through the whole Local Plan process and found to be sound. In the interests of fairness and to allow a comparison the SADMP site has been rescored and this appears under the LPr version. There is no change to the site. The score for ‘access to service’ is awarded a ‘++’ as it is relatively close to the service and facilities on offer as any of the other sites on offer. The score for highways is ‘+’ as it now forms part of the adopted Local Plan and this position is comparable to those scores awarded for the same category as the other site options proposed through the Local Plan review. The site is scored against the new factor ‘climate change’ and this scores ‘+/x’ as whilst the settlement and location are clearly sustainable, with a variety of service and facilities locally, there is also the train station and bus routes, some of the score will depend upon the design of the scheme, layout out and detail/specifications of the individual homes built. The owners are currently in conversation with a developer to bring the site forward. As this is a review of the Local Plan it is the intention to carry this site forwards.

Watlington - Sustainability Appraisal – Site Discussion

- Overall, the sustainability appraisal, based upon the information provided as part of the call for sites and policy suggestion consultation, further investigation / assessment and information from the draft Local Plan review consultation stage, that apart from the SADMP allocation no site scores overall well.
- Watlington Parish Council and the local community have embarked upon prepetition of a Neighbourhood Plan for Watlington. This was formal designated 5 March 2020 and corresponds with the parish boundary for Watlington. The Brough Council will seek take the same approach in supporting the parish council/ local community in the preparation of their plan. Given Watlington’s status in the Settlement Hierarchy and the

services/facilities available there may still be the potential for the village to accommodate a further modest levels of housing growth. This will be considered through the Neighbourhood Plan.

Watlington – Sustainability Appraisal – Site Conclusion

- The SADMP made a residential site allocation of G112.1 for at least 32 new homes. Given that this is a review of the plan, the Local Plan review seeks to carry forward this allocation as part of it.
- After careful consideration and on balance no further site are allocated. However, it should be recognised that given Watlington’s proposed status in the settlement hierarchy as a Growth Key Rural Service Centre, and level of services/facilities available including the rail way station and proximity to the A10 – being within the growth corridor, that Watlington could be able to accommodate further modest housing growth. The parish council and local community have commenced preparation of a Neighbourhood Plan for Watlington and in line with the approach the Borough Council have sought to take with other settlements and neighborhood plans this will be considered through the Watlington neighborhood Plan

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Watlington

Growth Key Rural Service Centre

Description

Watlington is situated approximately six miles south of King's Lynn, and seven miles north of Downham Market. The village is served by Watlington railway station (on the Fen Line between London Kings Cross- Cambridge and King's Lynn) which is situated less than a mile from the centre of the village. The Parish of Watlington has a population of 2,455 (Census Data 2011).

The village has a range of services and facilities present which include a general practice surgery, school, bus route, railway station, Post Office, public house and other retail uses. Watlington provides a local employment base which has developed from its role in serving the local agricultural community.

Strategic Context

The Local Plan review seeks to promote Watlington within the Settlement Hierarchy (LP02) to a Growth Key Rural Service Centre this is for two main reasons as discussed it currently has a wealth of facilities including the railway station and it is geographically located within the Local Plan review's A10/main rail line growth corridor, being almost equidistant between King's Lynn and Downham Market.

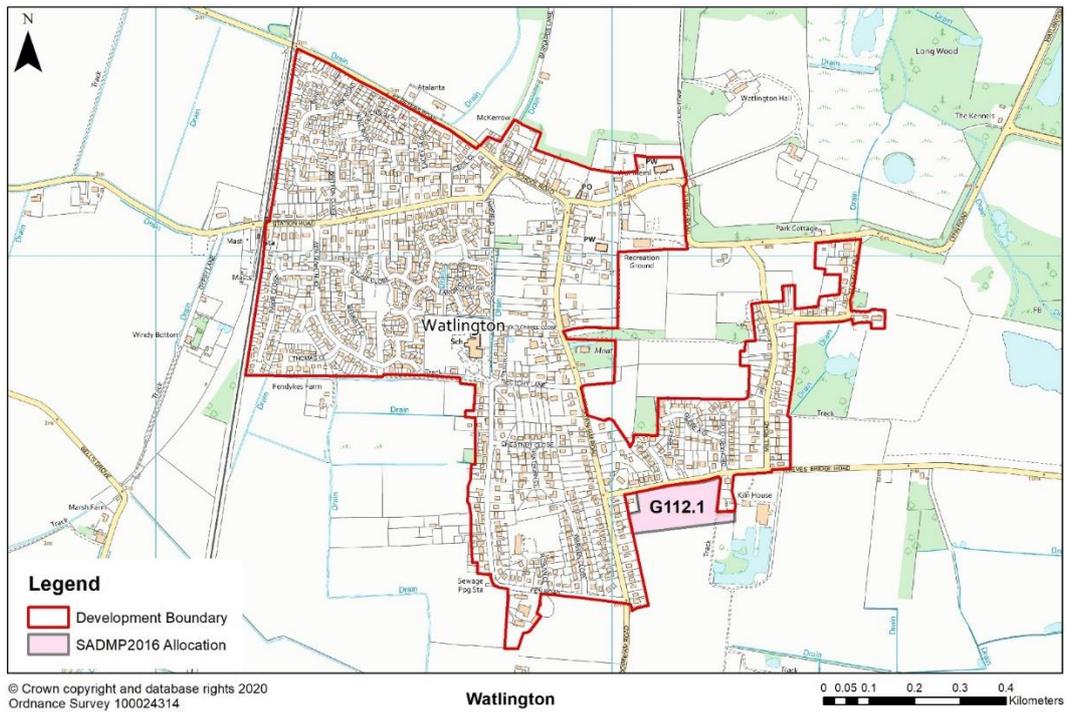
Neighbourhood Plan

The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area.

Watlington Parish Council in combination with the local community are in the process of preparing a Neighbourhood Plan for their Area. This was formally designed 05/03/2020 and corresponds with the parish boundary.

Once made their Neighbourhood Plan will form part of the Local Development Plan and will sit alongside the Local Plan. It will assist in guiding development within the Neighbourhood Plan Area through local policies and possibly allocations.

The Borough Council will assist the Parish Council with their preparations. Given this it would be inappropriate for the Local Plan review to impose development upon the Area. The Parish Council through their Neighbourhood Plan will have the opportunity to consider sites which have been proposed through the Local Plan review process, and others. Given the status of Watlington within the Settlement Hierarchy (LP02) and its role within the Borough it would be appropriate for further allocations to be considered through the Neighbourhood Plan.



G112.1 - Watlington - Land south of Thieves Bridge Road Policy

Site Allocation

This site was allocated by the SADMP (2016) and the Local Plan review seeks to support this. The site lies in the southern part of Watlington in a relatively built up area. It is situated south of Thieves Bridge Road and opposite established residential development in the form of bungalows and large detached houses.

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.

Policy G112.1 Watlington - Land south of Thieves Bridge Road

Land of around 1.8 hectares, as shown on the Policies Map, is allocated for residential development of at least 32 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of an Environmental Statement that satisfies Norfolk County Council that:
 - a. the applicant has carried out investigations to identify whether the resource is viable for mineral extraction and if the mineral resource is viable, that:
 - b. the applicant has considered whether it could be extracted economically prior to development taking place; and if the mineral resource can be extracted economically, whether (or not):
 - c. there are opportunities to use the onsite resource during the construction phases of the development;
2. Development is subject to the demonstration of safe highway access that meets the satisfaction of the Highway Authority;
3. Provision of affordable housing in line with the current standards.

Site Description and Justification

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.

The site is ideally located for residential development. It is well integrated within the built form and would represent a natural continuation of housing along Thieves Bridge Road, without significantly extending the village into countryside. It is considered that development in this location would not be intrusive in the landscape but would rather fill the gap between existing housing. When viewed from the wider landscape, development would be seen in the context of the existing village.

The site is well located to local services found within the village and has good pedestrian/vehicular links. Safe access and egress is obtainable from Thieves Bridge Road as supported by Norfolk County Council as the local highway authority, who identified the site as a preferable one in terms of highway matters.

The Borough Council considers that the site is of a sufficient scale to accommodate at least 32 dwellings, which were originally sought by the SADMP (2016) in this settlement, at a density consistent with its surroundings and without detriment to the form and character of the locality.

Appendix 1: Summary Comments from Local Community

The following is a summary list of the 131 objections received from the Local Community, who wish to see the proposed site WAT1 removed from the Local Plan review going forward. They have been categorised by broad theme and presented in this way to highlight the issues raised and avoid repetition:

Natural Environment

- Impact on natural environment/habitats/wildlife/ biodiversity, tress, hedgerows – flora and fauna
- list of species specifically mentioned: Bats, foxes, snakes, oil beetles, dragon flies, bees, crickets, butterflies, great crested newts, frogs, deer, monk jack deer, roe deer, rabbits, hedgehogs, mice, voles, moles birds: owls including barn owls & tawny owls, cuckoos, woodpecker, pied woodpecker sparrow hawks, jackdaws, falcon, kestrel, buzzards, red kite, mistle thrush, gold finishes, pheasants, swifts, marsh tits, robins, blackbirds, wrens, hedge sparrow, black caps, tree creepers, nuthatch
- Loss of historic meadow and greenfield site
- Site should be protected and not built upon
- Impact upon local bee keepers

Pedestrians & Highways

- Impact on local footpath network
- Road users and pedestrian safety
- Lack off road walking provision
- Concerns over access
- Increased traffic
- Suitability of existed local road network

Flood Risk

- Loss of drainage
- Loss of flood prevention

Infrastructure

- Impact on GP surgery
- Impact upon the schools
- Impact on utilities including water, electricity and the sewerage system
- Lack of decent bus service
- Train service not fit for expansion of the village
- Parking capacity at the train station

Heritage

- Impact upon the historic environment – listed buildings and moat

Landscape & Amenity

- New development proposed not in keeping with local area

- Noise and smells generated from new development
- Air quality / pollution generated from additional vehicles and homes
- Loss of views
- Impact upon privacy of existing residents/dwellings close by
- Loss of amenity space. Currently used for dog walking, walking, children to play, people to engage with nature
- Exacerbate anti-social behaviour
- Light pollution (dark skies)
- Impact on health and well-being (& Human Rights)
- Land should be used for horses
- Disruption during construction phase(s)

Alternative Suggestions for Development

- Sites which are predominately agriculture should be considered
- Consider sites on the edge of the village not the centre
- Investigate sites closer to the train station
- Empty homes across Norfolk should be used first
- Develop brownfield sites first
- Existing

Site Planning

- Site previously rejected for planning permission
- Site located outside of the development boundary
- Over development of the site
- Assessments to impact on fauna and flora / environmental impact / impact on schools /GP's/ rail way capacity feasibility need to be carried out before any development is proposed

General /Other:

- Want Watlington to remain a village and not become a town
- Ground instability
- Too much pressure on the area due to approved safari park

Table of Local Community Consultee's who have objected to WAT1

No.	Consultee
1	Mrs Edwina Huckle
2	Mr Daniel Tye
3	Miss Lucy Carter
4	J Cole
5	Ms K Shaw
6	Ms Karan McKerrow
7	Ms Stephanie and Isabelle Harwood
8	Mr & Mrs Bentley
9	Mr D E Wooldridge
10	Ms. Leonida Krushelnycky
11	Mrs Maureen Carter
12	Ms Stephanie and Isabelle Harwood
13	Mr Keith Stanley
14	Amy Marriott
15	Mrs Philippa Sillis
16	Ann Youngs
17	Alaina Slater
18	Mr D & Mrs E Seddon
19	Ms Stephanie and Isabelle Harwood
20	Unknown_Watlington
21	Alan Brown
22	Linda Brown
23	Mrs S and Mr RG Rowley
24	Mr J Clarke
25	Mrs Jenny Steppens
26	Mrs Vicky Gallagher
27	Mrs B Clarke
28	Nicky Roper
29	Mrs Sara Porter – Watlington Parish Council – signed CPRE Pledge
30	ILJ Tinworth
31	RG Rowley
32	Sonia Williams
33	A Wright
34	L Williams
35	Elaine Watson
36	GJ Moon
37	Kerry Harvey
38	V O'Keefee
39	Matt Clarke
40	James Blackwell & Helen Church
41	Unknown Watlington

No.	Consultee
42	Mrs S Laws
43	Mr & Mrs N Flack
44	Unknown Watlington
45	Liz Roads
46	David Roads
47	B & B Fisher
48	Gillian Roads
49	Mrs C O’Keeffe
50	B Bowden
51	Mrs J Jarvis
52	Lavinia Overson
53	Mrs Anne Stanley
54	Krystyna Coe
55	Sally Ward
56	Christine Cole
57	Mr J Clarke
58	KF Overson
59	Dennis Stanley
60	SA Castley
61	AG, AM & F Staines
62	Unknown
63	MR G Brothers
64	Mr Peter Toms
65	Lorna Gonsalves
66	Mr TE Crown
67	Lynda Jones
68	Wendy Fox
69	Mr & Mrs D.R. Day
70	Mr & Mrs K Day
71	Mrs Marilyn Tinworth
72	Karl Fisher
73	EL & GT Crown
74	RA Langman
75	John Bissell
76	Paul Offord
77	Mrs Susan Caley
78	Mrs Anne Trueman
79	Ann & Colin Sanderson
80	Marcus Cumberatch
81	Colin Farr
82	Miss Sophie Tye
83	Mrs Sandra Tye
84	Mr Christopher Steppens
85	Caroline Bishop. Also representing : Mr T M Bishop, Mr T R Bishop and Mr J S Bishop
86	Dr Carol Walker

No.	Consultee
87	Blackburn
88	Mrs Sandra Tye
89	Mr Andrew Tye
90	Mrs Jenny Steppens
91	Mr Michael J Davies
92	B Fletcher
93	Roger & Liz Howlett
94	Mr KM Fox
95	Mr & Mrs Minns
96	Mr P & Mrs T Toms
97	Bronwyn & Bryan Fisher
98	Mr Robin Jamieson
99	Dr R Barnes & Mrs J Barnes
100	Mr E Fiener
101	Mrs & Mrs Anderson
102	Mr & Mrs AJ Lomas
103	Mrs Kerry Brooks
104	Mr D & Mrs E Seddon
105	Mr David Wagg
106	Mr A Desborough
107	Mrs Emma Desborough
108	Miss Sarah Hawkins
109	Mrs Carol Hawkins
110	Mrs Victoria Alexander
111	Mrs Maureen Carter
112	Mr Edward Brown
113	Mr Alan Haverson
114	Mrs Sara Porter – Watlington Parish Council
115	Mr Michael Rayner (CPRE)
116	Mrs Harding
117	Mr Mark Harding
118	Mrs A T Beeby
119	Mr S J Beeby
120	Ms M McCutcheon
121	Mr Martin Sach
122	Mr Martin Sach
123	Ms Gemma Selwood
124	Dr M & Dr D Purves
125	Richard Crisp
126	E Gibson
127	Mr Steven Clear
128	Pamela Harding
129	Joan Carter
130	Mrs Jane Loveday
131	Ms Claire Young

Appendix 2: Summary of Comments from other consultees & Suggested Responses

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mrs Sara Porter Watlington Parish Council	Suggestion	<p>The Parish Council suggests the following preferred options and sites:</p> <p>H 468 – 13 dwellings on St Peters Road.</p> <p>H 466 – 43 dwellings on Downham Road.</p> <p>Total 56. For the remainder of dwellings, the land on the South side of Station Road between Gypsy Lane and the Relief Channel should be considered.</p>	Consider allocation of attentive sites to WAT1	<p>We could consider allocating the sites and investigate this further. Or as Watlington Parish Council and the local community have indicated an interest in preparing a Neighbourhood Plan perhaps we should leave this for their consideration in the interests of localism and supporting those communities who wish to prepare a Neighbourhood Plan</p>
Debbie Mack Historic England	Object & Suggestion	<p>Object - Whilst there are no heritage assets within the site boundary, there is a grade II listed building to the west of the site and a non-designated moated site also to the west of the proposed site allocation. The grade I listed Church of St Paul and Peter, the grade II listed Manor House and grade II listed Watlington House also lie in close proximity to the site. Any development would have the potential to impact upon the setting of these heritage assets. We note the inclusion of criterion 4 of the policy that requires a heritage Impact Statement.</p> <p>We have considerable concerns regarding the development of this site at this density, given the proximity of the heritage assets including the grade I listed church. We would recommend an early HIA in advance of the next draft of the Plan to help determine the suitability of the site per se and the extent of the developable area</p>	We recommend that an HIA be undertaken now in advance of the next draft of the Local Plan to help determine the suitability of the site per se and the extent of the developable area and thus the capacity of the site. This will then help inform the Plan and any potential policy wording.	<p>Agree that if we were minded to continue with the proposed WAT 1 allocation that a HIA should be prepared to inform the development. However it is unlikely that we will process with the allocation given the level of objection and the desire of the Parish Council and local community to prepare a Neighbourhood Plan</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		and thus the capacity of the site.		
Debbie Mack Historic England	n/a	See updated comments at: 978		No Action. Having read through the full comments, comments do not relate to Watlington
Mr Michael Rayner CPRE	Object	Watlington - unnecessary allocations due to existence of existing allocated sites and brownfield sites.	Remove proposed site allocation	Noted, Amend plan accordingly. The housing numbers have been recalculated given changes to the NPPF and associated documents and the BC latest housing trajectory. This suggests a change in approach. It should be noted that sites on the BC's brownfield register predominantly have permission or are allocated so in essence the site owners could potentially bring forward their sites.
Mr Michael Rayner	Object	CPRE Norfolk considers there is no need to change the status of Watlington within the settlement hierarchy to that of a Growth Key Rural Service Centre, given a) the very large number of sites already allocated for housing under the current Local Plan, the vast majority of which should be developed before considering any new sites, and b) the large number of brownfield sites across the Borough, which should be brought forward as part of a 'Brownfield First' policy.	Remove proposed site allocation & don't amend the settlement hierarchy	See response box above & Below regarding the Settlement Hierarchy. The position of Watlington in the proposed settlement hierarchy recognises the strategic position of the village within the A10/Main rail line corridor and also

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				reflects the services and facilities currently available at Watlington including the train station – sustainable transport.
Richard Rockcliffe	Support	Further to my telephone conversation with Mr Alan Gomm, I wish to state that I understood that Freebridge Housing (Steve Holtz) had been in discussion with yourselves regarding land to the south of the already allocated area adjacent to Thieves Bridge road (G112.1). Freebridge have already produced well developed plans for this site (G112.1) which are close to being submitted for planning (a mix of social housing and shared ownership properties). The site has been laid out to enable further development to the south, which we thought had already been registered with yourselves, and we cannot understand why this has not been recognised? We intend to provide further information over the course of the next 14 days.	Allocate Site H466	Great to see support for the existing Local Plan Allocation G112.1 from the land owner/site promoter. Would like to see this site developed. Also see box below
Richard Rockcliffe	Support	Landowner / Site promoter: Further information is support of Site H466 submitted in the form of sketch plans	Allocate Site H466	We could consider allocating the site and investigate this further. Or as Watlington Parish Council and the local community have indicated an interest in preparing a Neighbourhood Plan perhaps we should leave this for their consideration in the interests of localism and supporting those communities who wish to

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				prepare a Neighbourhood Plan
Mr Robin Jamieson	Object & Suggestion	Watlington footpath 6 is on overgrown glebe land which serves as a wildlife corridor. As well as the well known species reported by others there are some of scientific interest, including a snake which is either smooth snake, Coronella Austrica or a recently identified species of grass snake Natrix Helvetica. A photograph is available. There is also a very unusual newt which is all white but apparently not an albino. These are all protected species.	<p>The expansion of Watlington to provide much needed housing cannot be achieved without building on farmland unless all the most interesting and enjoyable of the rural areas are to be destroyed. I suggest a Watlington local plan is required which would</p> <ol style="list-style-type: none"> 1 Allow housing to be built within the 5m contour line to the north of The Angel and the church. 2 Give priority to plans allowing a higher proportion of genuinely affordable and energy efficient housing, including one and two bedroom starter homes. 3 Consider the local provision of health and educational resources. 4 Look into the 	<p>Points could be considered as part of the Local Plan review for Watlington. Or as Watlington Parish Council and the local community have indicated an interest in preparing a Neighbourhood Plan perhaps we should leave these matters for their consideration in the interests of localism and supporting those communities who wish to prepare a Neighbourhood Plan</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			possibility of encouraging light industry and local employment to the west of the railway line.	
Mr Dean (Emery Planning)	Objects & Suggestions	<p>14 page report executive summary:</p> <p>1.1 Emery Planning is instructed by Mr Dean to submit representations to the regulation 18 version of the King’s Lynn and West Norfolk Local Plan Review (2016-2036), which is being consulted on until 29th April 2019.</p> <p>1.2 Mr Dean’s primary interest relates to land adjacent to Watlington Station. The site has outline planning permission for a mixed use development comprising of a 50 space station car park, 500 sq m of B1 use, 9 no. residential dwellings and amenity space (LPA ref: 15/01306/OM). An application for reserved matters was made in February 2019 and is pending determination (LPA ref: 19/00170/RMM). The Council’s housing trajectory considers that the site is suitable and available and that the 9 residential dwellings approved are achievable (please refer to Line 47 of the 2018-based Housing Trajectory). It considers that the 9 dwellings will be delivered in the five year period (in 2022/23). The site has not been considered in the Housing and Economic Land Availability Assessment (HELAA, January 2019).</p> <p>1.3 We are promoting our client’s site on their behalf for further residential development in place of the approved B1 office units. The station car park would still be provided and there is potential to retain an element of commercial space. We have therefore submitted the site to the online “call for sites” process alongside the current regulation 18 consultation (ref: 29-04-20198211).</p> <p>1.4 Our representations on behalf of our client to the current</p>	See box to left	<p>1.2 The land has planning permission and doesn’t need to be allocated. The site will be considered for inclusion within the development boundary once it has been completed.</p> <p>1.3 A change of scheme can be applied for via planning permission.</p> <p>1.4 The housing need / spatial strategy section of the review will address this issue. The support for Watlington as a GKRSC is noted. Further redevelopment may be left for the Neighbourhood Plan</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>consultation document are summarised as follows: The housing requirement set out in policy SP01 of the consultation document is based on the local housing need figure of 555 dwellings per annum over a 20 year period plus a flexibility allowance of 15%, meaning 12,765 dwellings in total (annual average of 638 dwellings). This figure is lower than the current Objectively Assessed Need (OAN) figure of 690 dwellings per annum as set out in the Strategic Housing Market Assessment (SHMA). The local housing need figure is only the minimum housing required in accordance with the Government's standard methodology, which is being reviewed over the next 18 months. The housing requirement should therefore be increased to reflect the latest OAN.</p> <p>☐ It is unclear from the consultation document and the evidence base how the figure of 115 new dwellings for Watlington has been determined and how this reflects its identification as a Growth Key Rural Service Centre. We consider that the housing requirement for Watlington should be increased.</p> <p>☐ Our client supports the identification of Watlington as a Growth Key Rural Service Centre in policy SP02 of the consultation document. However, given the justification for identifying the village as a Growth Key Rural Service Centre is due to the railway station, development opportunities should be focused in close proximity to the railway station, including at our client's site.</p> <p>☐ We object to policy LP04 of the consultation document because despite the current planning permission, our client's site remains outside of the development boundary for Watlington as shown on the draft proposals map. The boundary should be amended to include our client's site.</p> <p>☐ In terms of the proposed allocation at land to the east of Downham Road and the West of Mill Road set out in policy WAT1</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		of the consultation document, we question why only one site has been identified, given the identification of Watlington as a Growth Key Rural Service Centre. There are constraints with the proposed allocation site WAT1 in terms of minerals safeguarding and access. Additional sites, including our client's site should be allocated for residential development.		
Norfolk County Council	Information	WAT1 - Watlington - Land to East of Downham Road and West of Mill Road If this site came forward as one and provided the main access onto Downham Road with a link road through to Mill Road. There would also need to be improvements to Mill Road and improvements to the Mill Road/ Church Road Junction		Noted
Mr J Maxey	Support and suggestion	I support the proposed allocation of WAT1 but suggest that it should be expanded to include the small area of land between its current designation and Glebe Avenue, as shown coloured blue on the attached annotated copy of the village plan. There is no logical reason for the exclusion of this land, which has access available from Glebe Avenue and is available for development. A separate call for sites submission will be made. The additional area, which is about 0.35 Ha, can be developed independently of the main allocation and would be a suitable means of introducing a self-build element to the area being suitable for around 5 dwellings. The alteration of scale of the proposed allocation is marginal and within the "at least" tolerance of any allocation scale of the plan	Amend the plan identifying the WAT1 allocation to include the additional area verged blue on the attached plan.	Watlington Parish Council and the local community have indicated an interest in preparing a Neighbourhood Plan perhaps we should leave these matters for their consideration in the interests of localism and supporting those communities who wish to prepare a Neighbourhood Plan
Bennett Plc	Support and Information	On behalf of our client, Bennett Homes, we support the proposed allocation of WAT1 – Watlington, as part of the Local Plan Review. WAT1 is proposed to be allocated for at least 115 dwellings. The site is considered to be entirely deliverable, and capable of making a significant contribution towards satisfying the Council's housing needs during the plan period to 2036.		Support and further information in support is noted. Watlington Parish Council and the local community have indicated an interest in preparing a

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years.</p> <p>By way of background, an outline application for 40 dwellings (reference: 15/01575/OM) on part of the proposed allocation site was recommended for approval by Planning Officers of the Borough Council of King's Lynn and West Norfolk, and was resolved to approve at Planning Committee in June 2016; with the caveat that in the event that a S106 Legal Agreement was not agreed within 4 months of the resolution to grant consent, the application would be recommended for refusal. As a S106 Legal Agreement was not agreed within the stipulated time period, the application was subsequently refused at Planning Committee in October 2016. Given that part of the proposed allocation site has been recognised as a suitable location for development (through the initial resolution to grant consent for development on the site), and the draft allocation within the Local Plan Review, Bennett Homes are working collaboratively with the adjacent landowner to bring forward delivery of WAT1 in its entirety.</p> <p>In addition, Bennett Homes, are a family developer with a significant track record of delivery in the Borough. Whereas, development on G112.1 (Land South of Thieves Bridge Road, Watlington) has yet to come forward, despite the site being allocated in 2016 in the Site Allocations & Development Management Policies Plan. No applications for development have come forward on the site. This, therefore, questions the delivery of G112.1 in accordance with the definition of 'deliverable' within the NPPF.</p>		<p>Neighbourhood Plan perhaps we should leave these matters for their consideration in the interests of localism and supporting those communities who wish to prepare a Neighbourhood Plan</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>The following Representation re-affirms the site's suitability, achievability, viability, and availability for residential allocation.</p> <p>Suitable</p> <p>The site is located adjacent to the existing development boundary of Watlington, which is a highly sustainable location, recognised as a Key Rural Service Centre within the Local Plan Review, due to the range of services available, alongside the village's location. In particular, Watlington benefits from a range of services and amenities, including a primary school, pub, Post Office, village hall, pre-school, and medical centre. Watlington also benefits from a train station, providing a direct rail connection to King's Lynn, Cambridge and London; and is located in close proximity to the A10 (providing direct access to King's Lynn, Ely, and Cambridge). Therefore, the site is in an entirely suitable location for residential development.</p> <p>In support of the previous application for development on the southern element of the site, a variety of technical reports have been prepared, which detail the site's suitability. Given the close proximity of the northern and southern elements of the site, it is deemed that the technical reports provided in support of development. See attached document for further details</p>		

Key Rural Service Centres (KRSC's)

Local Plan review link: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759466#section-s1542882759466>

Context & Consideration of Issues Raised

Given the picture with housing numbers and that there is no absolute need to allocate further sites in the Local Plan review, in order to meet the Borough Council's Local Housing Need (LHN) it is therefore proposed not to carry forward the draft allocations at KRSC's as outlined in the consultation version of the draft Local Plan review, with the possible exception of at Terrington St Clement which will be discussed in a separate paper, given this rather unique opportunity.

Many of the settlements are covered by Neighbourhood Plans at some stage of preparation or in some cases made/ adopted. Therefore, the Borough Council and the Local Plan review will support those Parish Council's and local communities through their Neighbourhood Plans.

Both statutory bodies Historic England (HE) and the Environment Agency (EA) have made a series of comments which relate specifically to allocations made by the Site Allocations and Development Management Policies Plan (2016). Clearly all of these sites have been through the rigours local plan process including examination and have been found to be sound by an independent Inspector. Nevertheless, it is important to consider the comments of the environmental statutory bodies and these will be considered in two separate papers.

The majority of the comments received either object to the newly proposed draft local plan allocations, which are no longer proposed to be taken forward. Or they relate to the promotion of other sites, most of which were assessed and either not carried forward from the Housing and Economic Land Availability Assessment (HELAA) or the draft Sustainability Appraisal did not class them as 'preferred options'.

There were a few requests to amend the development boundary, those which are not simply a request for the inclusion of a proposed site to be included, will be considered in a separate paper.

There were also several comments that opposed sites which had been submitted and appear in the HELAA/SA, even though they were not proposed for allocation.

With all of this in mind, what follows is a series of recommendations and an appendix schedule of the comments received as part of the draft Local Plan review consultation.

Recommendations:

General:

- Consider proposed development boundary changes together, in a separate paper.
- Consider points raised by Historic England together, in a separate paper
- Consider points raised by the Environment Agency together, in a separate paper
- Update sections accordingly with regard to relevant Neighbourhood Plan progress
- Update sections with latest progress on the SADMP allocations - if any have completed remove the policy from the plan and include the site within the development boundary
- Update the Policy Mapping to reflect agreements
- There is an appendix which consider the comments made at the draft consultation stage

Settlement Specific:

- **Brancaster with Brancaster Staithe/ Burnham Deepdale:** The Parish Council are preparing a neighbourhood plan review and a draft version has been published for consultation. Continue to support this and proceed with Draft Local Plan review approach to Brancaster. Update the position with regards to the Neighbourhood Plan and any progress with the SADMP Allocations.
- **Burnham Market:** The GP's element of the proposed draft allocation is proceeding without the need for allocation, so there is no need to allocate housing to support this or allocate the GP element in the plan. Given the housing numbers it is proposed not to carry forward the draft housing allocation BM1. It should also be noted that the Parish Council have signalled their intent to prepare a Neighbourhood Plan for their Area and the Borough Council should support this. Officers have already attended a series of meetings and the Area will most likely be designated in due course. It will be for the Parish Council to assess sites and decide if they wish to allocate sites for further residential housing.
- **Castle Acre:** The Parish Council are preparing a Neighbourhood Plan. Their consultation on a draft plan commenced (12/03/2020). The Borough Council should continue to support this. Proceed with Draft Local Plan review approach to Castle Acre. Update the position with regards to the Neighbourhood Plan and any progress with the SADMP Allocation.
- **Clenchwarton:** Given the Housing Numbers the draft allocation CLE1 should no longer be carried forward in the Local Plan review. It should be noted that the Parish Council are exploring the option of Neighbourhood Plan and BC officers have presented to the Parish Council and Public. Amend the plan accordingly and reflect and progress within the SADMP allocations.
- **Dersingham:** Continue to support the Parish Council through their Neighbourhood Plan. Carry forward the approach in the draft Local Plan review.

- **Docking:** Given the Housing Numbers the draft allocation DOC1 should no longer be carried forward in the Local Plan review.
- **East Rudham:** Given the Housing Numbers the draft allocation RUD1 should no longer be carried forward in the Local Plan review.
- **Emneth:** Given the Housing Numbers the allocation draft EMN1 should no longer be carried forward in the Local Plan review
- **Feltwell with Hockwold cum Wilton:** As proposed in the draft version remove allocation G35.2 Land north of Munson's Lane – site agent confirms the landowner has no interest in making any effort to develop the site, now, in the foreseeable future or ever. Carry forward the approach for Feltwell as outlined in the draft Local Plan review. It should be noted that the Parish Council of Feltwell are exploring the option of preparing a Neighbourhood Plan.
- **Great Massingham:** Given the Housing Numbers the draft allocation GM1 should no longer be carried forward in the Local Plan review. It should be noted the Parish Council are exploring the option of preparing a Neighbourhood Plan.
- **Grimston/Pott Row with Gayton:** Carry forward the approach outlined by the draft Local Plan review. Continue to support the Gayton Parish Council with their Neighbourhood Plan and the Parishes of Grimston (included Pott Row), Roydon & Congham who are jointly preparing a Neighbourhood Plan. It will be for these Qualifying Bodies through their Neighbourhood Plans to consider the policies for their Areas.
- **Heacham:** The Parish Council are preparing a Neighbourhood Plan for their Area. They have held their consultation and are moving forwards towards submission of the plan. The Borough Council should continue too support this. Carry forward the approach for Heacham as proposed by the draft Local Plan review
- **Marshland St James/ St John's Fen End with Tilney Fen End:** The Borough Council should support Marshland St James Parish Council through the preparations of their Neighbourhood Plan (Area Designated 24/01/2020). And Terrington St. John Parish Council who's designated area includes St John's Fen End. Given this development and the housing numbers it is proposed to no longer carry forward the draft allocation MSJ1.
- **Methwold with Northwold:** Both Parish Councils are exploring the option of preaging Neighbourhood Plans. Given the housing numbers no allocations should currently be proposed at this KRSC. None were at the draft stage as those sites which had been submitted for consideration we assessed as being not suitable.
- **Middleton:** As proposed by the draft Local Plan review remove SADMP allocation G60.1 Land south of Walter Howes Crescent. Given the housing numbers no longer take forward draft allocation MID1.
- **Snettisham:** The Snettisham Neighbourhood Plan has been made and came into force 03/12/2018. The Parish Council have indicated their wish to explore an early review of this and the Borough Council should support this. Continue forward with the approach outlined by the draft Local Plan review
- **Southery:** Given the Housing Numbers the draft allocation SOU1 should no longer be carried forward in the Local Plan review.
- **Stoke Ferry:** The Parish Council are preparing a Neighbourhood Plan for their Area. Given this and the housing numbers it proposed to no longer carry forward STF1 in the Local Plan review. The Bourgh Council should support the Stoker Ferry Neighbourhood Plan. Carry forward the approach to Stoke Ferry as outlined by the draft Local Plan review.

- **Terrington St Clement:** Consider this settlement separately given the rather unique opportunity presented.
- **Terrington St John with St John's Highway/Tilney St Lawrence:** The Borough Council should continue to support the Terrington St John Parish Council with their Neighbourhood Plan. Given the housing numbers is proposed to no longer carry forward TSL1 or TSL2 as a part of the Local Plan review going forward.
- **Upwell/Outwell:** The Borough Council should continue to support the Parish Councils as they continue to prepare their own Neighbourhood Plans. Please note the Upwell Neighbourhood Plan is at examination (March 2020). Carry forward the approach as advocated by the draft Local Plan review.
- **Walpole St Peter/Walpole St Andrew/Walpole Marsh:** Walpole Parish Council are exploring the option of preparing a Neighbourhood Plan for their Area. Given the Housing Numbers it is proposed not to carry forward with draft allocation WSA1.
- **West Walton:** Given the Housing Numbers it is proposed not to carry forward with draft allocation WEW1.

Appendix – Local Plan review Comments: Key Rural Service Centres (KRSC)

The Section column contains list the section and the section title contains a link to the relevant page of the draft Local Plan review consultation document, so the comments can read in full:

- If a number of consultee’s raise the same points/topics these have been grouped together, as the response will clearly be the same.
- Comments made by Historic England (HE) and The Environment Agency (EA) are considered in separate papers
- Requests to amend the development boundary (which are not simply to include a site put forward for consideration as an allocation) are also considered within a separate paper.
- Terrington St Clement is considered in a separate paper
- If any actions are recommended as a direct result of the comments this appear in ‘**bold**’ in the ‘Proposed Action’ column.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
KRSC	<ul style="list-style-type: none"> • Ian Cable • Mrs A Cox • Mr & Mrs J Lambert • Mr R Cousins • Mrs Carol Coleman 	Suggestion	Sites with planning permission should be included within the development boundary	See summary	The approach is to include allocations and windfall sites that are related to the existing development boundary within it once the site has been built out/completed
Burnham Market	Mr M Dudley	Suggestion	Inclusion of further site allocation	Allocate this site	Latest housing numbers suggest no need to allocate further sites through the Local Plan review. Burnham Market Parish Council and the local community are embarking upon a neighbourhood plan. The consultee could engage with this

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					process in the future
	Sarah Wyatt	Objection	Site for new GP's may be right, considers the site (BM1) should not be used for housing, however the old/current GP's site could be	See summary	BM1 not seeking to carry forward due latest housing numbers situation. Looks like the new GP's is coming forward independently of the Local Plan process. Existing GP's surgery could be redeveloped without the need to allocate through the Local Plan review
	<ul style="list-style-type: none"> Mrs Rachel Campbell-Gray Steve Wood Mrs Jane Ridley Mr Nigel Strongitharm 	Objection	Objects to BM1		BM1 not seeking to carry forward due latest housing numbers situation. Looks like the new GP's is coming forward independently of the Local Plan process. Existing GP's surgery could be redeveloped without the need to allocate through the Local Plan review
	David de Stacpoole	Suggestion	Seeking for inclusion of his land within the development boundary or allocation	See summary	Latest housing numbers suggest no need to allocate further sites through the Local Plan review. Burnham Market Parish Council and the local community are embarking upon a neighbourhood plan. The consultee could engage with this process in the future
BM1 - Burnham Market Land south of Joan	<ul style="list-style-type: none"> Murdo Durrant (Burnham) 	Objects	<ul style="list-style-type: none"> Objects to BM1 Number of houses In the AONB 	Remove site	BM1 not seeking to carry forward due latest housing numbers situation.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Short's Lane and east of Creake Road Policy	Thorpe PC) <ul style="list-style-type: none"> • Greg Garland • Chris Yardley • Graham Gooch • Sarah Greenhall • Dr Paul Zuckerman 				
	Mr M Rayner (CPRE)	Suggestion	BM1 must provide the right number of affordable homes	See summary	BM1 not seeking to carry forward due latest housing numbers situation.
	Burnham Market PC	Objects	Objects to BM1	Remove site	BM1 not seeking to carry forward due latest housing numbers situation. The BC has held a number of meetings with the PC and local community regarding taking forward a neighbourhood plan for the area. It is anticipated that this will take place and the BC will fully support this. Update Local Plan review to reference neighbourhood plan potential.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Holkham Estate	Support & Suggestion	Strongly supports the proposed allocation BM1 and makes several suggestions as to the proposed policy clauses in relation to the retention of buildings, possible conversion of existing buildings	See summary and full representation	Due to the latest picture with regards to housing numbers it is no longer proposed to carry forward this draft allocation. It would appear that the new GP's can still come forward and this would be supported by the BC through existing policy relating to community facilities. Burnham Market PC and the local community are embarking upon a neighbourhood plan for the area it would be strongly advised that both parties liaise in a constructive way.
	Norfolk County Council	Suggestion	BM1 - Sections of frontage footway should be provided on Creak Road linking to the existing footway provision on the western side via a suitable pedestrian crossing. Ideally the new footway should be 1.8 m in width. Further improvements will be required to the wider footway provision linking the site to/from the main residential parts of the village both to the north and the south. Access improvements would also need to be implemented.	See summary	BM1 not seeking to carry forward due latest housing numbers situation.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Castle Acre	<ul style="list-style-type: none"> Martin Tate (Castle Acre PC) X2 Linda Roast (Castle Acre PC) 	Observations	Castle Acre PC's views & CPRE pledge. Please see full responses	See Summary	The BC are in continued and active discussion with Martin Tate regarding the Castle Acre Neighbourhood Plan which the BC is fully supportive of. The NP is currently at the Reg. 14 Consultation Stage (April 2020). Ongoing and constructive dialogue is continuing. It will be for the NP to assess sites and make allocations
	Sally Hubbard	Objects	Objects to a site which has been put forward for consideration and has been assessed in the HELAA as site H030		The Local Plan review is not proposing any further allocations at Castle Acre. The emerging Castle Acre Neighbourhood Plan may well look to
	Holkham Estate	Support	<ul style="list-style-type: none"> Support the continuation of the SADMP allocation Are actively engaged in the Castle Acre Neighbourhood Plan Wish to support site they have proposed in the Local Plan review process (H032) if the Neighbourhood Plan isn't forthcoming 		The Support is noted and welcomed. The Castle Acre Neighbourhood Plan is progressing in a timely fashion and it is encouraging that the PC and Holkham Estate are engaged in a constructive process as part of the emerging Neighbourhood Plan
G22.1 - Castle Acre - Land west of Massingham Road	Debbie Mack (Historic England) X2	Support & Objection	See separate HE response paper	See separate HE response paper	See separate HE response paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Clenchwarton	Gavin Lane X2	Proposal	Allocate site H0531 / H0532	See summary	Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time
	David Goddard	Proposal	Allocate his site	See summary	Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time
	Jenny Rowe (Clenchwarton PC)		<ul style="list-style-type: none"> • Object to housing numbers • No longer a Doctors at Clenchwarton • Recent flooding concerns • Why has the development boundary been changed? 		<p>Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time</p> <p>Plan doesn't say there is a Doctors at Clenchwarton</p> <p>The latest information available at the time has been used to inform both the Local Plan review and the determination of planning applications. BCKLWN SFRA 2019. Which the EA have been fully engaged with</p> <p>There are no proposed changes to the development boundary. The Local Plan review seeks to carry forward that as adopted in</p>

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					the SADMP (2016) for Clenchwarton
	Mr D Thorpe x3	Proposal	Allocate his site	See summary	Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time
	Jemma Curtis	Proposal	Amend development boundary as per the submitted plan	See summary	See separate paper on Development Boundaries
	Debbie Mack (Historic England)	No Comments			
	Mr & Mrs Gay	Proposal	Allocate their site or include in development boundary	See summary	Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time
	Peter Humphrey x2	Proposals	Allocate sites H043 & H044 or include them within the development boundary	See summary	Due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time
G25.1 - Clenchwarton - Land between Wildfields Road and Hall Road Policy	Elizabeth Mugova (Environment Agency)	Suggestion	See separate EA response paper	See separate EA response paper	See separate EA response paper
	Jenny Rowe (Clenchwarton PC)	Objects	Object to G25.1 on flooding grounds	Remove allocation form the Plan	The site benefits from both outline planning permission (15/01315/OM) and reserved matters (19/00913/RMM) for 10 dwellings (granted 08/10/2019).

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					Indeed, a number of conditions have since been discharged. As part of the planning process the Environment Agency were satisfied with the flood risk assessment submitted, subject to conditions. No further action
G25.2 - Clenchwarton - Land north of Main Road Policy	Jenny Rowe (Clenchwarton PC)	Objects	Objects to the 'at least' wording		This was an essential element of the SADMP being found sound, please see SADMP Inspectors Report . The site has come forward and benefits from outline planning permission (15/01269/OM) and reserved matters (19/00466/RMM) for 19 dwellings. No further action
CLE1 - Clenchwarton - Land to the north of Main Road Policy	The Crown Estate	Support	Support for the draft proposed site Allocation CLE1		Supported noted. However, due to the latest housing numbers picture, there is no need to allocate further sites at Clenchwarton at this time. So that the site will not be taken forward at this time
Dersingham	Sarah Bristow (Dersingham PC) x2	Support	<ul style="list-style-type: none"> • Supports the Local Plan review • CPRE Pledge 		Support Noted. Dersingham are involved in preparing a Neighbourhood Plan for their Area. The BC fully support this and they are back on track with this following focusing efforts on

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					a new village hall/meeting place. They are working towards a draft version for consultation
G29.1 - Dersingham - Land north of Doddshill Road Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
G29.2 - Dersingham - Land at Manor Road Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
Docking	John Ward (Docking PC)		CPRE pledge		CPRE should engage with the Government regarding housing numbers.
	Colin Tuck		Objects to a potential development sites		The site he mentions doesn't from part of the Local Plan review
G30.1 - Docking - Land situated off Pound Lane (Manor Pasture) Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
DOC1 – Docking Land south of Pound Lane and west of Bradmere Lane Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
	<ul style="list-style-type: none"> Jamie Bird 	Support	Supports the proposed site allocation		Noted. If the site was to be

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	<ul style="list-style-type: none"> Erica Whettingste el 		DOC1 and also a wider site		allocated it is probably better to take a longer-term view and allocate the whole site allowing comprehensive planning for the area rather than a short-term piecemeal approach. However, due to the housing numbers picture currently no further allocations are required at this time
	Norfolk County Council	Support	Support for DOC1		Noted. Allocation no longer required to meet housing numbers
East Rudham	Nikki Bareham	proposals	The Rudham's should be combined to from a Key Rural Service Centre Proposal for 4 detached dwellings		East Rudham is a KRSC, West Rudham is a Smaller Village and Hamlet. The two could be combined but this would simply make a larger KRSC. Other Joint KRSC exist as there are shared service between the two. The proposed development is too smaller in terms of numbers to be considered through the HELAA/SA/Local Plan review, 5 is minimum number of homes considered. This could be amend to be consistent with this, but currently the housing numbers indicate there is no need to make any further allocations, although

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					policy LP26 could be of interest to this consultee as a potential way of bringing the site forward.
G31.1 - East Rudham - Land off Fakenham Road Policy	Debbie Mack (Historic England)		No Comment		
RUD1 – East Rudham Land to north of Lynn Road Policy	Debbie Mack (Historic England)	Suggestion	See separate HE paper	See separate HE paper	See separate HE paper
	Norfolk County Council	Support	Support for RUD1		Noted. Allocation no longer required to meet housing numbers
Emneth	Debbie Mack (Historic England)		No Comment		
	Richard Waite X3	Suggests	Allocate Site H108, Site H109, Site H110		No further allocations required. No further allocations needed to meet the local housing numbers at this current time
	Mrs Hilary Keightley	Suggests	Allocate Site H120		No further allocations required. No further allocations needed to meet the local housing numbers at this current time
	Peter Humphry	Suggests	Included consented site(s) within the development boundary		The development boundary is interested to have a number of functions including identifying where development is potentially suitable, protecting the

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					countryside. It is not intended to include all of what is the settlement of Emneth. Sites which have completed may be included within the development boundary if appropriate.
	Peter Humphrey x7	Suggests	Allocate Site H119, Allocate Site H118, Allocate Site H100, Allocate Site H127, Allocate Site H111. Or included them within the development boundary.		No further allocations required. No further allocations needed to meet the local housing numbers at this current time
EM1 – Emneth Land north of Church Road Policy	Mrs A Cox	Supports	Supports the allocation of EMN1		The site is no longer supported as part of the Local Plan review as it isn't required to meet the Local Housing Need at this time. It is recommended that Policy LP26 is considered by the consultee
	Norfolk County Council	advice	Support site EMN1 subject to criteria	Subject to footway improvements and a junction improvement at Bambers Lane. Footway improvements must provide a connection to the existing footway to the east of Gypsy Lane	The site is no longer supported as part of the Local Plan review as it isn't required to meet the Local Housing Need at this time.
G35.1 - Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Norfolk County Council	Amend	Update policy to reference correct NPPF para.in regard to the historic environment	See Summary	Agreed see summary
	Elizabeth Mugova (Environment Agency)	Suggests	See separate EA response paper	See separate EA response paper	See separate EA response paper
G35.2 - Feltwell - Land north of Munson's Lane Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
	Brown & Co.	Support	As I am sure has been confirmed to your team before, my clients have no interest in making any effort to develop their land now or in the foreseeable future, if ever.	Remove site from plan	The site is proposed to be removed from the Local Plan review and will not appear in the submission version
	Norfolk County Council	Amend	Update policy to reference correct NPPF para.in regard to the historic environment	See Summary	The site is proposed to be removed from the Local Plan review and will not appear in the submission version
G35.3 - Feltwell - Land at 40 Lodge Lane / Skye Gardens Policy	Debbie Mack (Historic England)	No Comment			
G35.4 - Hockwold cum Wilton - Land south of South Street Policy	Debbie Mack (Historic England)	Advice	See separate HE paper	See separate HE paper	See separate HE paper
	Norfolk County Council	Amend	Update policy to reference correct NPPF para.in regard to the historic	See Summary	The site has permission and has indeed completed. It is now

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			environment		proposed to be removed from the Local Plan review and will not appear in the submission version
Great Massingham	Gary Alexander	Proposal	Allocate Site H156	See summary	No further allocations are required at this time to meet the Local Housing Need
G43.1 - Great Massingham - Land south of Walcup's Lane Policy	Debbie Mack (Historic England)	See separate HE paper	See separate HE paper	See separate HE paper	See separate HE paper & The site is already allocated as part of the SADMP (2016). The site has come forward and benefits from planning permission for 16 dwellings (16/01634/OM & 18/02038/RMM).
	Mr Stephen Baker	Suggests	The area for development makes no mention of what environmental measures are to be taken to protect the annual migration of toads and Great Crested Newts across that land which every March move to breed in the "Big Pit" pond. Indeed, there is no acknowledgement that there is an awareness of this	To consult with the voluntary bodies/individuals who constitute the annual Great Massingham Toadwatch, whose principal aim is to help protect and conserve all amphibian wildlife in the village of Great Massingham. To take appropriate action to conserve this protected wildlife, vital to the natural environment of the village of Great Massingham.	The site is already allocated as part of the SADMP (2016). The site has come forward and benefits from planning permission for 16 dwellings (16/01634/OM & 18/02038/RMM).
	Tim Slater	Suggest	Allocate Site H156	See summary	No further allocations are required at this time to meet the Local Housing Need

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Norfolk County Council	Amend	Update policy to reference correct NPPF para.in regard to the historic environment	See Summary	Amend Policy accordingly to NPPF (2019) para. 189
GM1 – Great Massingham Land east of Castle Acre Road Policy	Debbie Mack (Historic England)	See separate HE paper	See separate HE paper	See separate HE paper	Due to housing numbers, the site is no longer sought for allocation through the Local Plan review.
	Diocese of Norwich	Suggests	Support for GM1, Allocate H160 & H158	See summary	No further allocations are required at this time to meet the Local Housing Need
	Norfolk County Council	Advice	GM1 -Subject to access as this may require land for the required visibility splay across the now unallocated section. If this site is an extension to the existing village and will provide some frontage development with a continuous footway; a visibility splay measuring 2.4 x 59m is likely to be acceptable. If this is not the case the visibility splay would probably be 2.4 or 4.5 x 90m, depending on the scale of development and speed of traffic. Highways would expect the site owner to provide evidence to show that this could be achieved.		No further allocations are required at this time to meet the Local Housing Need. So, the site will not be taken forward
	Mr Michael Wingell	Proposal	Allocate site which the PC advocate near the GP's rather than GM1	See summary	No further allocations are required at this time to meet the Local Housing Need. So, the site will not be taken forward. The PC's site could come forward

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					through a neighbourhood plan or potentially a revised version of Policy LP26
	<ul style="list-style-type: none"> Mr Michael B Jackson Mr P A James 	Objection	Objects to GM1 based on highway safety. Supports the PC site	Seek an alternative site	No further allocations are required at this time to meet the Local Housing Need. So, the site will not be taken forward. The PC's site could come forward through a neighbourhood plan or potentially a revised version of Policy LP26
	Tim Tilbrook	Support & Objection	Supports the allocation of the PC site near the GP's. Objects to the allocation of GM1. Supports the PC's views	See summary	No further allocations are required at this time to meet the Local Housing Need. So, the site will not be taken forward. The PC's site could come forward through a neighbourhood plan or potentially a revised version of Policy LP26
Grimston/Pott Row with Gayton	<ul style="list-style-type: none"> Mr Jill Garton Ms Brenda Cornelius 	Objects	To potential development of Grimston Cricket Pitch		This does not form part of the draft Local Plan review.
	Dr Judith Taylor	Objects	Objects to a development proposal, however it is not clear which?		Comments not clear, no action

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Mr & Mrs Rudd	Support & Proposal	Supports the KRSC status and supports site H288 for allocation	See summary	Suggest that the consultee engages in the Neighbourhood Plan process for Grimston. As it will be this process that looks at potential development sites. This is supported by the Local Plan review.
	Debbie Mack (Historic England)	No Comment			
	FK Coe and Son x5	Proposals	Provides supporting information for four sites and suggests these are allocation. HELAA Ref 25-11-20163001, Ref 25-11-20163779, Ref 25-11-20166188, 25-11-20165238, Ref 27-11-20169730	See summary	Suggest that the consultee engages in the Neighbourhood Plan process. As it will be this process that looks at potential development sites. This is supported by the Local Plan review
	Mrs Rosiland Larrington	Proposals	Provides information with regard to land for potential development		Suggest that the consultee engages in the Neighbourhood Plan process. As it will be this process that looks at potential development sites. This is supported by the Local Plan review
	Mr John Curry	Proposal	Support for site Ref: 28-11-20162666		Suggest that the consultee engages in the Gayton Neighbourhood Plan process. As it will be this process that looks at potential development sites. This is supported by the Local Plan review

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Ms Phillipa Sewell (Grimston PC)	CPRE Pledge			Grimston are engaged in the Neighbourhood Plan process which is fully supported by the BCKLWN and the Local Plan review.
	Mrs Sarah Bristow x3	suggests	<ul style="list-style-type: none"> • Suggest that Anglian Water are consulted as part of development • Talks about a site, but not clear which one? • Concerned about the number of homes given permission as part of G41.1 		Anglian Water are consulted as part of the Local Plan process and through the planning determination process. 'at least' was key to the plan being found sound, it has also assisted with 5-year housing land supply and the housing delivery test. The Gayton Neighbourhood Plan process is fully supported by the BCKLWN and the Local Plan review.
G41.1 - Gayton - Land north of Back Street Policy	Mrs Sarah Bristow x2 (Gayton & Gayton Thorpe PC)	Questions	Questions housing numbers		'at least' was key to the plan being found sound, it has also assisted with 5-year housing land supply and the housing delivery test. Also, a justifiable allowance for windfall development is factored into housing number calculations for the Local Plan and 5-year housing land supply. These positions will be updated accordingly as a new FY occurs and the Plan moves towards submission consultation. The Gayton Neighbourhood Plan

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					process is fully supported by the BCKLWN and the Local Plan review. The site has come forward and benefits from outline planning permission for 40 new homes (15/01888/OM). A reserved matters application in line with this has been submitted and is currently being considered (19/00694/RMM)
G41.2 - Grimston and Pott Row - Land adjacent Stave Farm, west of Ashwicken Road	<ul style="list-style-type: none"> • Mr Colin Manning • Kevin Mummery • Tim Tilbrook 	Objects	<ul style="list-style-type: none"> • Objects to development of Grimston cricket pitch • Proposed development boundary for Congham 		This does not form part of the draft Local Plan review.
Heacham	Mrs Sue Eke (Heacham PC) x2	Advice CPRE Pledge	<p>General suggestions for the Local Plan review relating to:</p> <ul style="list-style-type: none"> • Housing numbers • Greenfield/amenity land protection • Affordable housing policy • Air Quality • Developer contributions • Housing along the A149 		Heacham PC are engaged in the Neighbourhood Plan process. This fully supported by the BCKLWN and through the Local Plan review. 'At least' forms a key part of the Local Plan and was essential to the plan being found sound (please see SADMP Inspector Report). It has assisted with 5-year housing land supply and the housing delivery test. 80% + of the SAMP (2016) have already come forward and

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					benefit from planning permission. Sometime the need for housing out weighs the need to build on some greenfield sites, there are not enough brownfield sites to meet the need, they are difficult to develop and often take a long time to come forward see NORA as an example. Affordable housing policy will be reviewed as part of the Local Plan review. Developer contributions are addressed elsewhere in the Local Plan review, and through planning permissions, S106 agreements and CIL. The A149 provides a transport route to a number of settlements within the north of the Borough it is not the intention to not allow any development to place which the occupants may use this route.
	Mel Able Farming Ltd	Supports	Supports Site H184 for development	Allocate site H184	Suggest that the consultee engages in the Heacham Neighbourhood Plan process as this will consider sites for allocation
	Ken Hill Estate	Proposals	Supports their sites for allocation in the Local Plan review	See summary	Suggest that the consultee engages in the Heacham Neighbourhood Plan process as this will consider sites for

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					allocation. The Heacham NP is progressing well, having already undertaken the Reg.14 consultation
G47.1 - Heacham - Land off Cheney Hill Policy	Debbie Mack (Historic England)	No Comment			
G47.2 - Heacham - Land to the south of St. Mary's Close Policy	Debbie Mack (Historic England)	Object	See separate HE response paper	See separate HE response paper	See separate HE response paper. This site has come forward with a planning proposal and now benefits from outline planning permission (16/00245/O) for 8 new homes. This has been progressed by a series of reserved matters permissions (17/00251/RM, 17/01114/RM, 18/01458/RM & 19/01005/RM). The first four homes are have been completed.
Marshland St James/ St John's Fen End with Tilney Fen End	Sarah Thorpe (Marsh Land St James PC)	Views	<ul style="list-style-type: none"> we no longer have a pub in our village. site H223 there is a footpath Object to (S224 and H231). We prefer the site H227 & S224 (if required) 	See summary	No further allocations required to meet the Local Housing Need currently. Marshland St James are now engaged in the Neighbourhood Plan process and the BCKLWN supports this as does the Local Plan review.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Debbie Mack (Historic England)	No Comment			
	MTC Engineering (Cambridge) Ltd	Support	Support for Site H225	Allocate site H225	No further allocations required to meet the Local Housing Need currently. Suggests the consultee engages in the neighbourhood plan process
	Peter Humphrey	Support	Support for Site H223	Allocate site H223	No further allocations required to meet the Local Housing Need currently. Suggests the consultee engages in the neighbourhood plan process
	Carol Coleman	Objects	Doesn't believe this should be a KRSC	See summary	Meets the criteria therefore is proposed as a KRSC, please see the settlement hierarchy.
MSJ1 – Marshland St James Land south of School Road Policy	Norfolk County Council	Advice	Would need to provide at least a part time 20mph speed limit		No further allocations required to meet the Local Housing Need currently. So MSJ1 will not be taken forward as part of the Local Plan review
	John Maxey	Support & Objects	Supports MSJ1, however believes it should be two allocation policies to cover the two-separate parcels of land	See summary	No further allocations required to meet the Local Housing Need currently. So MSJ1 will not be taken forward as part of the Local Plan review

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Methwold with Northwold	Northwold & Whittington PC	Objects & CPRE Pledge	Level of infrastructure not in plan to support growth advocated by the Plan		No new allocations were proposed in the draft Local Plan review. Allocations shown at Methwold & Northwold were allocated by the SAMP which was found sound at examination and subsequently adopted in 2016. Many of the sites now have planning permission and are being built.
	Rachel Buckle (Methwold PC)	CPRE Pledge	Generic letter		CPRE should engage with the Government/MHCLG re: housing numbers
G59.1 - Methwold - Land at Crown Street Policy	Debbie Mack (Historic England)	Object	See separate HE paper	See separate HE paper	See separate HE paper
G59.4 - Methwold - Land off Globe Street/St George's Court Policy	Debbie Mack (Historic England)	Object	See separate HE paper	See separate HE paper	See separate HE paper
Middleton	Barclay Farm Estate	Support	Support for Site H220 and supporting documents for this Owner agrees to deletion of G60.1	Allocate Site H220	No further allocations required to meet the Local Housing Need currently through the Local Plan review

G60.1

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Debbie Mack (Historic England)	No Comment			
	Elaine Oliver (Middleton PC)	CPRE Pledge	Generic letter		CPRE should engage with the Government/MHCLG re: housing numbers
MID1 - Middleton Land west of School Road Policy	Norfolk County Council	Advice	Subject to footway improvements along site frontage		No further allocations required to meet the Local Housing Need currently through the Local Plan review. It is proposed not to take MID1 forward.
Snettisham	John Maxey	Suggests	All neighbourhood Plan allocations policies are shown in the Local Plan. If A neighbourhood plan isn't complete the Local Plan should allocate in that location		Neighbourhood Plan allocations will be shown on the Policy Map, the neighbourhood plans can be easily located on the BCKLWN website, repeating the policy is not necessary. As both the Local Plan and neighbourhood plans form part of the development plan. Allocating where is neighbourhood plan is being prepared would undermine the process and would not be in the spirit of localism/neighbourhood plans.

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Debbie Mack (Historic England)	No Comment			
	Simon Bower (Snettisham PC) x2	Support	Good to see the Neighbourhood referenced and no further allocations proposed beyond that contained within the neighbourhood plan. A grumble about the timing of the consultation. CPRE Pledge		The BCKLWN was supportive of the Snettisham Neighbourhood Plan preparation process and is supportive now it has been adopted. This forms part of the local development plan and there is no need to replicate everything in there within the Local Plan review. There is a clear link between the two expressed in the Snettisham chapter, however this will be updated. The PC has signalled their intentions to carry out an early review of their NP and the BCKLWN would support this. Whenever a consultation takes place, something else will no doubt be occurring, the BCKLWN did extend the consultation to 8 weeks to allow a full or further responses from anyone who wished to take part.
	The Ken Hill Estate	Supports	Support the allocation of two of their sites and requests greater information with regards to neighbourhood plans in case of non-delivery.		No further allocations are required through the Local Plan review to meet the local housing need currently. Suggest that the consultee engages in the

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					neighbourhood plan review process for Snettisham. The Snettisham Neighbourhood Plan has been Made and a planning application has been submitted for consideration for the allocation which the neighbourhood plan. Non-delivery of a neighbourhood plan itself would be picked up through future Local Plans and reviews which legally now have to take place every 5 years.
Southery	Debbie Mack (Historic England)	No Comment			
	Roger & Joyce Burton	Proposal	Support for Site H334 to be allocated	Allocate Site H334	If the site already has planning permission and is capable of being delivered then it should be, it doesn't need to be allocated. Once the development has completed it could be considered for inclusion within the development boundary. There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). The HELAA shows that the site cannot be delivered as the required visibility

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					splays cannot be achieved, so the site is in fact undeliverable so cannot be allocated.
	Mrs Annette Osler	Advice & Proposal	Provides information as to why Site H334 cannot be delivered or allocated. Allocate all of H332 not just a small portion	Allocate all of H332	There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). SOU1 will not be taken forward.
SOU1 - Southery - Land to north of Lions Close Policy	Norfolk County Council	Advice	SOU1 - If this site is accessed through the new estate road that is under construction to the south onto Lions Close it would be acceptable.		There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). SOU1 will not be taken forward.
Stoke Ferry	Helen Richardson (Stoke Ferry PC)	Information	Provides information at the services and facilities currently at Stoke Ferry	Update accordingly	Agreed, thanks for the information, Plan updated accordingly. Stoke Ferry are no engaged in the Neighbourhood Plan process which is fully supported by the BCKLWN and through the Local Plan review
	Mr J Kirchen x2	Proposals	Include two sites, one at Valmers Road and another at Wretton Road within the development boundary	See summary	Generally, sites are not included within the development boundary until they have been completed. Also suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
	Amber REI Limited	Proposal	Suggest that the Mill Storage Site on Furlong Road is included within the	See summary	Generally, sites are not included within the development

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			development boundary		boundary until they have been completed. This site has come forward along with the mill and now benefits from planning permission. Also suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
	Mrs J Hall	Proposal	Objects to STF1, considers H347 should allocated instead	Allocate H347	There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
	Mr Russel Swann	Support	Support for site G81.1 and progress update		Noted. Thanks for the response. Site progress will be updated based upon the latest information
	Mr & Mrs J Lambert	Proposal	Proposes that their site is allocated	See Summary	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
G88.3 - Stoke Ferry - Land at Indigo Road / Lynn Road Policy	Debbie Mack (Historic England)	Object	See separate HE paper	See separate HE paper	See separate HE paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
STF1 – Stoke Ferry Land to west of Fairfield Road Policy	James Grant (BCKLWN)	Support	Support for site STF1, looking to bring this site and the adjacent allocation forward as a Custom and Self-build site		There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
	Mrs J Hall	Proposal	Allocate Site H347	See Summary	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Suggest the consultee engages in the Stoke Ferry Neighbourhood Plan process.
Terrington St Clement and Associated sections					Please see separate Terrington St Clement Paper for consideration of consultation responses
Terrington St John with St Johns Highway/Tilney	Debbie Mack (Historic England)	No Comment			

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
St Lawrence					
	Peter Humphrey x2	Proposal	Allocate Site H378 Included a further parcel of land within the development boundary	See summary	There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Suggest the consultee engages in the Terrington St John Neighbourhood Plan process.
G94.2 - Terrington St John, St John's Highway and Tilney St Lawrence - Land north of St. John's Road Policy	Elizabeth Mugova (Environment Agency)	See separate EA paper	See separate EA paper	See separate EA paper	See separate EA paper. Note this site is proposed for removal from the plan and will most likely not be taken forward in the Submission Version of the Plan
	John Maxey	Advice	Remove allocation completely from the plan if proposed to be removed	See summary	The site will be removed from the Submission Version of the Plan. It was left in the draft with information relating to its proposed removal to draw out any further comments with regard to the site
TSL1 – Tilney St Lawrence Land adjacent to Tinley St	Norfolk County Council	Advice	TSL1 - Tilney St Lawrence - Land adjacent to Tilney St Lawrence Primary School/West of School Road Would need to provide at least a part		There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). TSL1

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Lawrence Primary School, west of School Road Policy			time 20mph speed limit		will most likely not be taken forward.
TSL2 – Tilney St Lawrence Land to the west of School Road Policy	Norfolk County Council	Advice	TSL2 - Tilney St Lawrence - Land West of School Road Would need to provide at least a part time 20mph speed limit.		There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). TSL2 will most likely not be taken forward.
Upwell/Outwell	John Maxey X2	Views	Don't leave new allocations to the Neighbourhood Plans. Suggests a number of sites		Suggest the consultee engages in the Upwell and Outwell Neighbourhood Plan processes. There is also no absolute need to allocate further sites through the Local Plan review to meet the Local Housing Need. The neighbourhood plans however may choose to.
	Francis Thomas	Proposal	Allocate site 25-11-20163465	See summary	Suggest the consultee engages in the Upwell and Outwell Neighbourhood Plan processes. There is also no absolute need to allocate further sites through the Local Plan review to meet the Local Housing Need. The neighbourhood plans however may choose to.

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Kate Bennett (Upwell PC)	CPRE Pledge			Upwell PC are engaged in the Neighbourhood Plan process, with at the time of writing, the plan being at the examination Stage
	Peter Humphrey x3	Promotes	Promotes sites H413, H414 & H403 for allocation	See summary	Suggest the consultee engages in the Upwell and Outwell Neighbourhood Plan processes. There is also no absolute need to allocate further sites through the Local Plan review to meet the Local Housing Need. The neighbourhood plans however may choose to.
G104.1 - Upwell - Land north west of Townley Close Policy	Debbie Mack (Historic England)	Objects	See Separate HE paper	See Separate HE paper	See Separate HE paper. Note the sites has outline planning permission granted.
	Graham Moore (Middle Level Commissioners)	Objects	Objects to G104.1 being allocated		Allocated in SADMP (2016) found sound at examination and adopted. The site now benefits from outline planning permission.
12.21.2 G104.2 - Upwell - Land south/ east of Townley Close Policy	Graham Moore (Middle Level Commissioners)	Objects	Objects to G104.2 being allocated		Allocated in SADMP (2016) found sound at examination and adopted. The site now benefits from outline and reserved matters planning permission.

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
G104.3 - Upwell - Land at Low Side Policy	Debbie Mack (Historic England)	Objects	See Separate HE paper	See Separate HE paper	See Separate HE paper. Site allocated in SADMP (2016) found sound at examination and then adopted. The site is currently subject to an enlargement via the Upwell Neighbourhood Plan. This currently at the examination stage.
	Graham Moore (Middle Level Commissioners)	Objects	Objects to G104.3 being allocated		See Separate HE paper. Site allocated in SADMP (2016) found sound at examination and then adopted. The site is currently subject to an enlargement via the Upwell Neighbourhood Plan. This currently at the examination stage.
G104.4 - Upwell - Land off St Peter's Road Policy	Debbie Mack (Historic England)	Objects	See Separate HE paper	See Separate HE paper	See Separate HE paper. Site allocated in SADMP (2016) found sound at examination and then adopted. The site has been granted planning permission and has been built out, is as good as complete. So, the allocation policy will be removed and site drawn into the development boundary
	Graham Moore (Middle Level Commissioners)	Objects	Objects to G104.4 being allocated		Site allocated in SADMP (2016) found sound at examination and then adopted. The site has been granted planning permission and has been built out, is as good as

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					complete. So, the allocation policy will be removed and site drawn into the development boundary
G104.6 - Outwell - Land Surrounding Isle Bridge Policy	Graham Moore (Middle Level Commissioners)	Objects	Objects to G104.6 being allocated		Site allocated in SADMP (2016) found sound at examination and then adopted. The site currently benefits from outline planning permission
Walpole St Peter/Walpole St Andrew/Walpole Marsh	John Maxey	Suggests	Suggests extending the proposed draft allocation	See summary	The Local Housing Need can be met without the need for further allocations. Therefore, it is unlikely that draft site allocation WSP1 will be taken forward at all
	Mr R Cousins x2	Proposal	Allocate site 884 and look to amend the development boundary to take account of development with permission		The Local Housing Need can be met without the need for further allocations. The approach is generally not include sites which have planning permission until the development is completed
	Cllr Richard Blunt	Proposal	he development boundary for Walpole St. Andrew / Walpole St. Peter could logically be extended to include the relatively small portion of Chalk Road, which currently lies outside of the development boundary. Historically this area may have been	See summary and full representation	Please see separate paper on development boundaries

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			excluded to provide a degree of separation between the two villages. Today however, the two villages are fairly well joined together and this could be acknowledged further, particularly as the Local Plan review itself considers the villages to be a Joint Key Rural Service Centre.		
	Mrs S Harris	Proposal	Suggests various changes to the development boundary, please see full representation for full details	See summary	Please see separate paper on development boundaries
G109.1 - Walpole St. Peter - Land south of Walnut Road Policy	Debbie Mack (Historic England)	Object	Please see separate HE Paper	Please see separate HE Paper	Please see separate HE Paper
	Elizabeth Mugova (Environment Agency)	Question	Please see separate EA Paper	Please see separate EA Paper	Please see separate EA Paper
G109.2 - Walpole St. Peter - Land south of Church Road Policy	Elizabeth Mugova (Environment Agency)	Question	Please see separate EA Paper	Please see separate EA Paper	Please see separate EA Paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
WSA1 – Walpole St Andrew Land south of Wisbech Road Policy	Debbie Mack (Historic England)	Object	Please see separate HE Paper	Please see separate HE Paper	Please see separate HE Paper. Although please note the site will most likely not be taken forward as the Local Housing Numbers can be met without the need for further allocations.
	Norfolk County Council	Advice	WSA1 - Not a preferred site as there are no continuous footways back to services		The site will most likely not be taken forward as the Local Housing Numbers can be met without the need for further allocations.
West Walton	Debbie Mack (Historic England)	No Comment			
	John Maxey x2	Proposal	Amend the development boundary, please see representation for details Suggests that West Walton and Walton High Way should be re-joined as a KRSC rather than split as proposed by the draft Local Plan review	See Summary	Please see separate development boundary paper. The decision to split the two settlements is a political one, please see the settlement hierarchy.

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Draft Policies – Terrington St Clement (TSC)

Link to draft policy and comments in full received from the draft consultation stage:

TSC: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759485#section-s1542882759485>

Summary of Issues Raised: (Please see Appendix 1 for comments and responses)

- Support for allocation G93.3 from agent
- Support for proposed allocation TSC1 from agent
- NCC Transport confirm TSC1 acceptable. Please also see Appendix 1 for illustrative Masterplan, and Appendix 2 for NCC HA response to current planning application (18/00940/OM).
- Support for Site H360 (reasonable alternative) from agent
- Historic England made a number of helpful suggestions to policies within this chapter
- Environment Agency raised a number of points
- A further site has been proposed for consideration HELAA Ref. 2H062 (25-04-20191185). This has been appraised through the agreed HELAA methodology and progresses to the Sustainability Appraisal, see later in report for full details.

Conclusions & Recommendations:

- Amend SADMP allocation policies and supporting text in light of Historic England comments.
- Amend the supporting text in line with the progress of each site and the comments made by the Environment Agency.
- Continue to support the proposed allocation TSC1 from the draft stage through to the Pre-submission stage. Whilst there may not be an absolute need to allocate further residential sites, the numbers being provided are very close to the minimum required to meet the Local Housing Need (LHN). The site also offers a rather unique opportunity to improve the area and make use of a derelict brownfield site at the centre of the village, close to service and facilities including the primary and high schools (please see Sustainability Appraisal for further information). Allocation would aid Local Plan flexibility with regard to housing numbers, planning positively to ensure the Borough Council meets its LHN. The site owners/agent have also brought forward a planning application for the site (18/00940/OM). The draft allocation and the planning application match, the application is currently pending a decision and is being held in abeyance to see if it is agreed the allocation should be carried forward.
- Remove the TSC buffer zone which is a part of G93.3. This no longer required as TSC1 is proposed to be taken forward
- Update the policy map accordingly

Policy Recommendation:

The supporting text will be updated also to account of the following changes to the policies.

G92.2 -Terrington St. Clement – Land Adjacent King William Close

1.Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the Conservation Area and the setting of the nearby Listed Building (Grade 2 Listed Post Office);

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G93.3 - Terrington St. Clement - Land West of Benn's Lane

.....

7. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and their settings.

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Policy TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane

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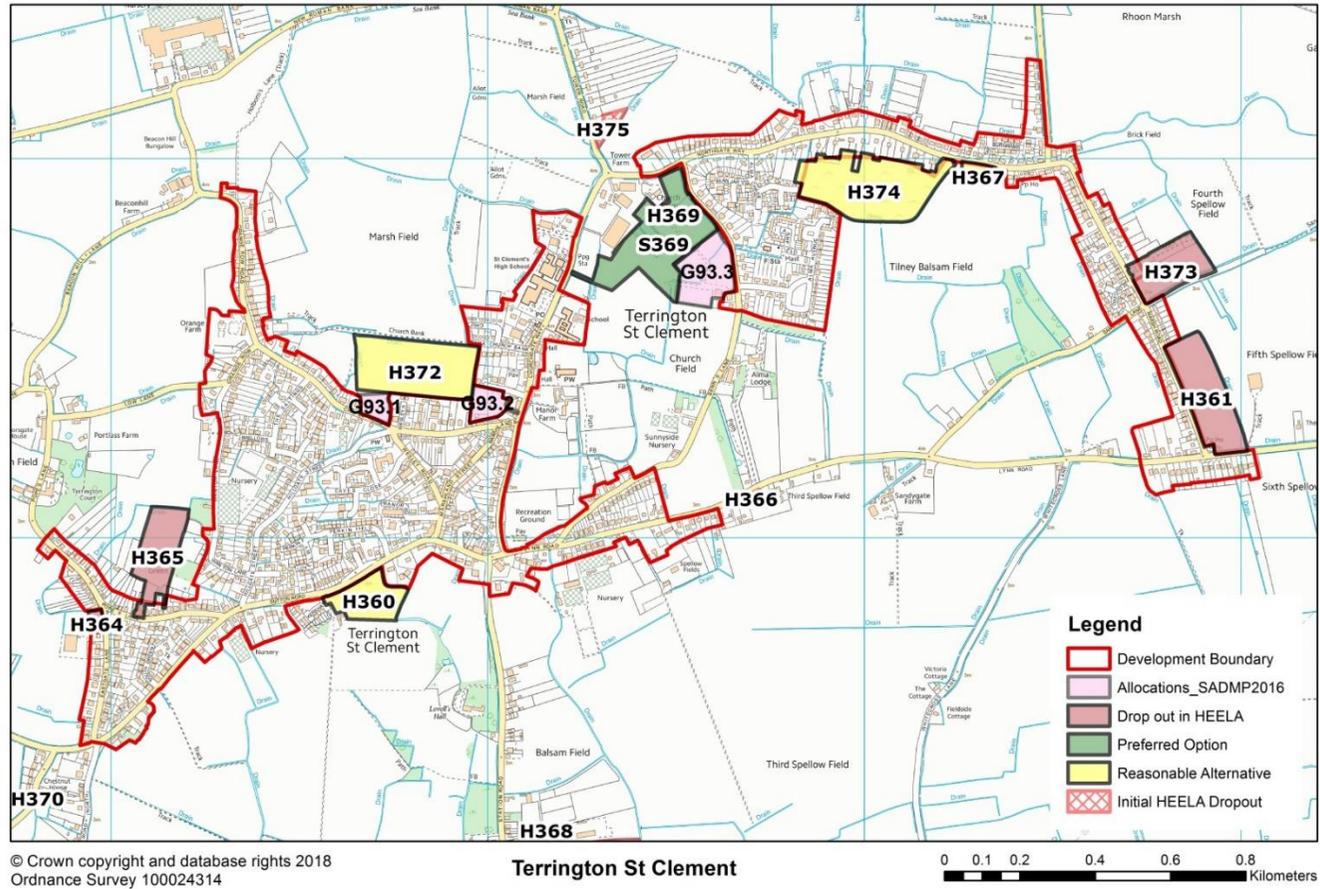
6. Submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality, accompanied by an Archaeological Field Evaluation of the site, if required

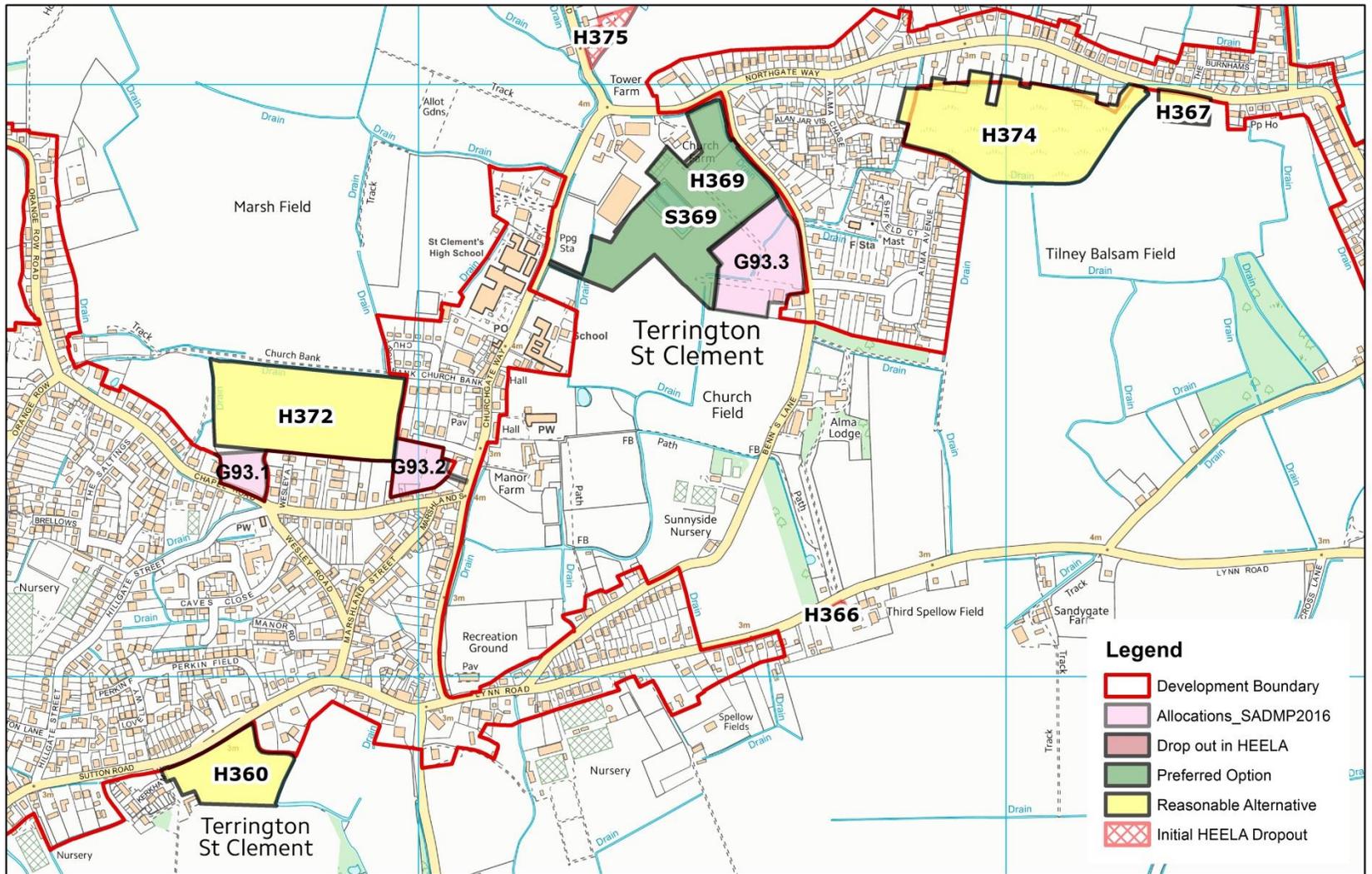
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and Grade 2 Listed Tower House and their settings. This should be accompanied by an Archaeological Field Evaluation of the site, if required.

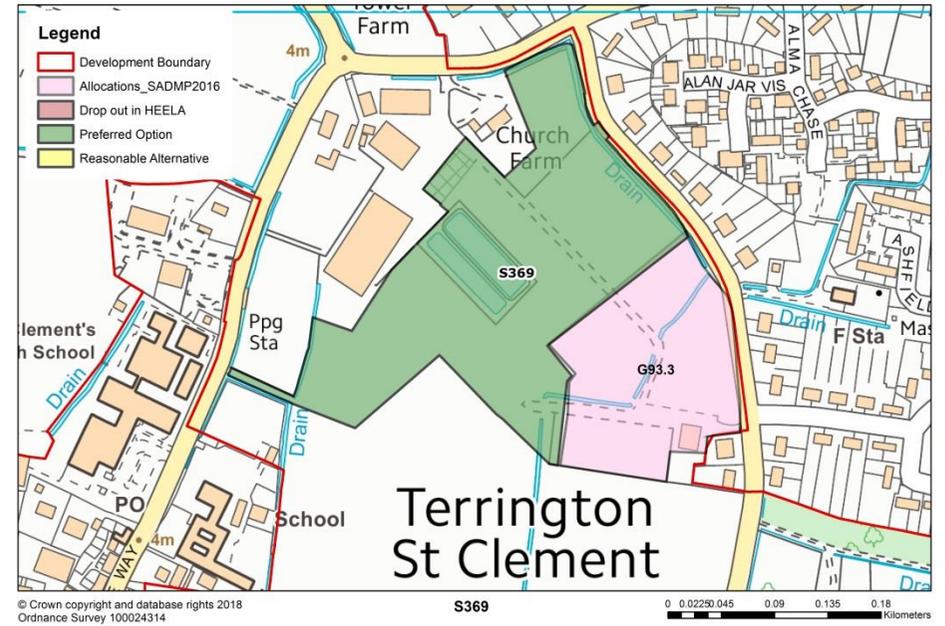
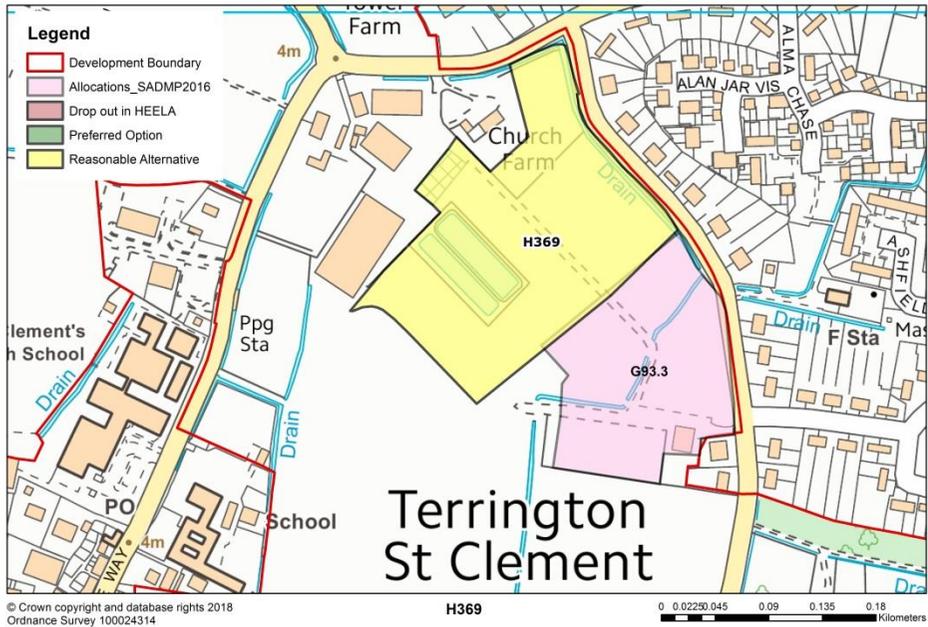
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Terrington St Clement - Sustainability Appraisal – Site Map

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Terrington St Clement – Sustainability Appraisal – Further Information

A number of sites were rejected in the HELAA due to the concerns regarding flood risk according to the best information available at that time. This was primarily Environment Agency mapping and the 2009 BCKLWN SFRA, which showed pockets of the settlement being within lower risk flood zone than others. Since the HELAA exercise was completed, the BCKLWN have updated their SFRA, this is based upon the latest available modelling and data. The latest SFRA, which looks at all sources of flooding, shows that the entire settlement of Terrington St Clement to be within Flood Zone 3a. There is considered to be no risk from fluvial flooding, the highest risk flooding mechanism is tidal / coastal (1-200 year breach) and the most likely source of flooding is surface water flooding (1 in 30 year event). Most of the settlement is within an area benefiting from flood defences.

With no sites being located within a lower Flood Risk Zone than Flood Zone 3a, those sites which were excluded by the HELAA for flood risk reasons alone have been brought back for further assessment in the sustainability appraisal.

Site H372 was rejected by the HELAA on access grounds, but brought back for further assessment. The final site brought back for further assessment is H369. This is because the site is classed as a Brownfield and there is a clear emphasis within planning and indeed the revised NPPF (2018/2019) upon the re-use of previously developed land.

Terrington St Clement – Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
LPr G93.1	++	+	O	xx	xx	O	#	O	O	#	#
LPr G93.2	++	+	O	+/x	xx	#	#	O	O	#	+/#
LPr G93.3	+	+	O	+	xx	#	#	#	#	#	+
SADMP G93.1	++	+	O	xx	+/x	O	#	O	O	#	n/a
SADMP G93.2	++	+	O	+/x	+/x	#	#	O	O	#	n/a
SADMP G93.3	+	+	O	+	xx	?	#	#	?	#	n/a
H360	++	+	O	xx	xx	#	#	#	O	O	#
H367	++	+	O	xx	xx	O	#	#	O	O	#
H369	++	+	O	+	xx	#	x	+	O	#	#
S369	++	+	O	+	xx	#	+/#	+	O	#	+
H372	++	+	O	xx	xx	#	x	#	O	#	#
H374	++	+	O	xx	xx	O	#	#	O	#	#

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Terrington St Clement - Sustainability Appraisal – Site Commentary

G93.1 (Part of site 539) – The site is well integrated with the village and sits at a central position in close proximity to a range of local services and amenities. Site access is proposed from Chapel Street; the Highway Authority made no objections to small scale development on the site subject to local improvements to the road and pedestrian network. The site is situated in a built-up part of the village with existing housing to the east, west and south (opposite the road). Development would constitute infill and would relate adequately with the existing form of the area. It is considered that given its scale and the nature of the area, development is likely to have minimal impacts on the landscape character and amenity of the area. The LPr version of the site is the same as the SADMP one however the scores have been updated to reflect the current situation with regards to flood risk and the new factor ‘climate change’. Here a ‘#’ is awarded as whilst the settlement and site have been found to be sustainable and provide many services/facilities locally. Much will depend upon the design of the scheme, layout, and the details/specifications of the individual new homes.

G93.2 – The site is identified as one of the higher scoring sites in terms of access and proximity to services. It is centrally located and within walking distance to a number of local services including a pub, church, bus stops, shops, surgery, village hall and the school. Safe site access and pedestrian access is obtainable. The Highway Authority made no objections to the site subject to its design implementation. The site comprises of brownfield land (previous industrial use) and grade 1 (excellent quality) agricultural land. The eastern site boundary immediately borders the Conservation Area, the proposed access is within the Conservation Area and there is a Listed Building adjacent the site. Any impacts on this sensitive area can be mitigated by a high standard design scheme and layout that preserves or enhances the character of the Conservation Area and the settings of the Listed Building. The site is well integrated with existing development and is mostly screened on all sides by existing housing. As such development is likely to have minimal impact on the landscape and visual amenity of the area. The LPr version of the site is the same as the SADMP one however the scores have been updated to reflect the current situation with regards to flood risk and the new factor ‘climate change’. Here a ‘+/#’ is awarded as whilst the settlement and site have been found to be sustainable and provide many services/facilities locally and part of the site is brownfield. Much will depend upon the design of the scheme, layout, and the details/specifications of the individual new homes.

G93.3 – The site performs highly in the sustainability appraisal as the site comprises of only brownfield land meaning that development would not result in loss of productive agricultural land, also development of the site is likely to have no impact on the economy as it only comprises of derelict greenhouses and does not include employment area. The site scores positively in terms of proximity to services and is within reasonable walking distance to a good range of services including the school. Site access is proposed from Benn’s Lane and safe access and impact on the road network is dependent on the design of the scheme. The site is subject to high flood risk (FZ3). There are minimal views of the site available as it is mostly screened on all sided my mature planting and built development. Development on the site is likely to have minimal landscape and visual impact but provides an opportunity to visually improve the derelict nature of the site. The potential allocation of the land adjacent through the local plan review could allow access through onto Northgate Way as

opposed to Bennis Lane. The LPr version of the site is broadly the same as the SAMP version however the scoring has been updated for 'heritage' and landscape' to '#' as will be discussed later the site now benefits from planning permission. The score for 'climate change' is considered to be '+' as the location and settlement are considered sustainable and offer services/facilities for daily life locally, and the site is brownfield. Clearly there would be room for further improvement depending upon the final design of the development. A change to the site is proposed to occur in the event that the adjacent land is allocated as there will be need for the buffer zone that was previously part of the policy. This was to separate housing from potential employment uses on the adjacent, as a buffer zone would not be required if both elements were to be residential.

H360 (04-12-20161389) – This site, located to the south of the village, south of Sutton Road. The site is a short distance from what could be considered the centre of the village and the services currently on offer here. The site is classed as Grade 2 Agricultural Land and the promoter of sites states that it is in agricultural use. In terms of Flood Risk the site is located within Flood Zone 3a. Although the majority of site is masked existing development the Conservation Area and a number of listed buildings are only a short distance away and these heritage assets and their settings should be taken into consideration through the design of any scheme. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise they consider that any impact upon the functioning of the local road network could be reasonably mitigated. The site is predominantly surrounded by existing residential development of either a ribbon style or estate style (Perkin Field & Kerkham Close), so development of the site would be in keeping with the localised settlement pattern. It is considered that impact upon the natural environment would be neutral; no negatives have currently been identified with regard to 'Infrastructure, Waste & Pollution'. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H367 (28-11-20162336) – H367 is located to the east of the village on the southern side of Northgate Way. It is still within a reasonable distance to services and facilities but not as close as some of the other sites available. The site is classed as Grade 1 Agricultural Land and the promoter of sites states that it is in agricultural use. In terms of Flood Risk the site is located within Flood Zone 3a. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise they consider that any impact upon the functioning of the local road network could be reasonably mitigated. The site is predominantly surrounded by existing residential development of a ribbon style or estate/ cul-de-sac (The Burnhams) style. If developed the site would most likely be in a frontage ribbon style, the site would therefore be in keeping with the localised settlement pattern. No negatives have currently been identified with regard to 'Infrastructure, Waste & Pollution'. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H369 (28-11-20165391) – H369 is located in the eastern portion of the settlement and to the north west of SADMP allocation G93.3, which was found to be a sustainable location. The site has brownfield status as it was granted a certificate of lawful use for B2 General Industrial purposes in 2010. In the past the site hosted a horticultural business, it currently comprises a range of semi-derelict structures associated with this. The site has been vacant for some considerable time (almost 10 years), given this and potential for the site to meet the criteria set in Policy CS10 The Economy the impact upon ‘economy A business’ is judged to be neutral. The site isn’t currently and is unlikely to be agricultural land used for farming associated with cattle or crop production; therefore, the score for ‘economy B food production’ is a positive. As with all of the growth options for Terrington St. Clement this site is within Flood Zone 3a. The Conservation Area and a number of listed buildings are a short distance away from the site and therefore these and their setting will need to be taken into account should the site be developed and Norfolk Historic Environmental Services team have previously stated that there is the potential for archaeological remains to be present on the site. They state that further investigation would be required and that these can be conditions of planning permission (involving further site investigation). NCC HA consider that Benns Lane is substandard, including the junction with Lynn Road and Northgate Way and will remain substandard despite improvements associated with the development of SADMP allocation G93.1, hence the site receives a negative score for ‘highways & transport’. Given the previous use the BCKLWN Environmental Protection state there is the potential for contamination. Anglian Water state that off-site mains reinforcements may be required. The score for ‘landscape & amenity’ is judged to be a positive, as whilst the scheme will need to take into account existing housing in the local area, it will clearly replace a semi-derelict brownfield site which currently has no practical use and could continue to deteriorate to determinate of the area.

S369 (28-11-20165391) – This site is similar to Site H369. However, it is slightly larger and corresponds to the site proposed as a planning application, 18/00940/OM. Through the evolution of the determination process, an alternative access arrangement has been proposed. With access now proposed off Northgate Way. This is considered to be more favourable than having an access off Benn’s Lane, and Norfolk County Council as the Local Highway Authority would raise no objection. Consequently, the scores for the site in the majority of the site sustainability factors are similar, with exception of highways and transport which is now awarded a ‘+/#’ positive/dependent upon implementation. As The larger site could also cater for a pedestrian link onto Churchgate Way, close to the schools. As well as link road and path through to the existing allocation G93.1 enabling traffic generation from this development a route onto Northgate Way rather than using Benn’s Lane. With regard to ‘climate change’ site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, the site is also seeking to provide a footpath link to the schools and centre of the village. As discussed, all of Terrington St Clement is within Flood Zone 3a, and development of the site would take place on land classed as brownfield / previously developed. Through the planning application SuDs are proposed, the NCC as the LLFA welcome this and raise no objection, as do the Environment Agency. Therefore, the score for climate change on balance is a positive. It is recommended that the text above to Site H369 is consulted, rather than simply repeated in full here.

H372 (28-11-20169444) - This site was originally assessed in the HELAA and discounted as it was believed that there was no possibility of creating access to the site. However, the site promotor states that access can be gained through the existing SADMP allocation G93.1. Indeed a planning application for the site has been put forward and is currently being considered (17/01649/OM); the application is all matters reserved apart from access and the site plan shows the main access road traveling through the site to the land behind the application site, which is Site H372. A gap appears on the map between G93.1 and H372 but in reality, there isn't one as the outline application for site G39.1 covers this small gap. NCC HA considers that whilst access may be possible, the local road network is poor and there isn't the ability to achieve any significant improvements. They said yes to G93.1 on the basis that it was less than estate scale and they have stated previously they did not want to see any future development on land to the rear (which would include this site). The site is centrally located to the village with services close by. It is classed as Grade 1 Agricultural Land and appears to be in agricultural use. As with all of the growth options the site is within Flood Zone 3a. Although masked by existing development the Conservation Area is a short distance to east and south of the site. The site is boarded by development to the south and east, with some to the north east and some further to the west. Through the planning application previously mentioned it appears that there is a sewage pipe running across the north western portion of the H372 which would need further consideration. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H374 (BCKLWN1) – Site H374 is located to the south of Northgate Way, in the eastern section of the village. The site is behind frontage development and would fill a gap between this and two housing estates (Alma Chase & Alma Avenue). This site is a reasonable distance from services and facilities, but not as close as other options. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise, they consider that any impact upon the functioning of the local road network could be reasonably mitigated. It is considered that the impacts upon the natural and historic environment would be neutral. Anglian Water state that there is the potential for improvement to the utility capacity to facility development and that off-site mains reinforcement would therefore be required. The BCKLWN Environmental protection team state that there may be the potential for some contamination to be present on site. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

2H062 (25-04-20191185) – This site, located to the south east of the village, north of Lynn Road. The Scores positively for 'access to service' being a short distance from the village centre and services currently on offer. The site could provide housing and affordable housing which would be a benefit to 'community and social'. The site is currently classed as Grade 2 Agricultural Land and the promotor of site states it is agricultural use. The site like all

Terrington St Clement is within Flood Zone 3a. Most of the site is masked by existing development from the conservation area, however medium/short distance views to the Church and conservation area to the north west are available and heritage assets and their settings will need to be taken into consideration in the design of any scheme. NCC HA consider that access could be achieved from Lynn Road and that some footpath widening would be required. Within the site are a number of TPO's and a significant belt of woodland in the eastern portion, countryside and housing surround the site. The design of any scheme will be required to respond to this setting and the features located within the site. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

Terrington St Clement - Sustainability Appraisal – Site Discussion

- **G93.1**– This site is allocated by the SADMP for a residential development of at least 10 dwellings. The site has come forward and benefits from full planning permission for 10 new homes (17/01649/O & 19/01589/RMM).
- **G93.2**– This site is allocated by the SADMP for a residential development of at least 17 dwellings. The site has come forward and benefits from full planning permission for 17 dwellings (19/00712/F). The majority of the site is complete. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O).
- **G93.3**– This site is allocated by the SADMP for a residential development of at least 35 dwellings. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O).
- All of the new sites considered through the Local Plan review score comparably similar through the sustainability appraisal. Whilst some sites score less well in certain factors other sites score better in other factors.
- Site H374 and H367 are greenfield site, they are slightly further away from what can be defined as the centre of the village, where the majority of service and facilities can be found.

- H372 is a greenfield site in close proximity to two SAMP allocations and the centre of the village, NCC HA would object to the development of the site based upon the nature of the local road network. H360 is a greenfield site and is located well in terms of services, as is potentially 2H062
- H369 merits further consideration as the site is Brownfield. The NPPF places a strong emphasis upon the re-use of previously developed land and states that housing need should be accommodated as much as possible on previously developed / brownfield land (para. 117). It also states that substantial weight should be given to the re-use of such land for homes, and appropriate opportunities should be supported to remediate despoiled, degraded, derelict, contaminated or unstable land (para. 118). S369 is a similar site to H369 albeit slightly larger, planning permission is being sought for the site and a part of this an alternative access arrangement utilising Northgate way has been proposed which is considered to be acceptable to NCC HA. The proposal also includes the provision of a link road with path to the adjacent site allocation (G93.3) which would also enable traffic generated from this site to utilise Northgate Way as opposed to Benn’s Lane. The site also scored the highest for ‘climate change’ in Terrington St Clement.
- It is the information provided in the above paragraph that results in the site being proposed for allocation in the Local Plan review, as whilst other sites score overall as well they do not offer the opportunity to develop a brownfield/ previously developed site. As development of the site represents an opportunity to re-develop a brownfield site and bring back in to active use by contributing towards meeting the housing needs of the area. The site is not currently in active economic use, it is difficult to suggest it will be and the future of the site if not used for housing is uncertain. S369 is capable of delivering a slightly higher number of dwellings (76) than sought for allocation and overall scores comparatively well. It should be noted this mirrors what is currently proposed by the planning application.
- Some of the remaining sites could be proposed for development in a future a Local Plan or Neighbourhood Plan, if considered appropriate at that time.

Terrington St Clement – Sustainability Appraisal – Site Conclusion

- Local Plan allocations G93.1, G93.2 & G93.3, for the reasons stated above, are proposed to carried forward as part of the Local Plan review.

- After very careful consideration and balancing all of the factors, including comments made by those consulted through the HELAA, the draft Local Plan review, and current planning application, Site S369 is proposed for the residential development of at least 76 dwellings, which is in-line with the current planning application, 18/00940/OM.

Terrington St Clement

Key Rural Service Centre

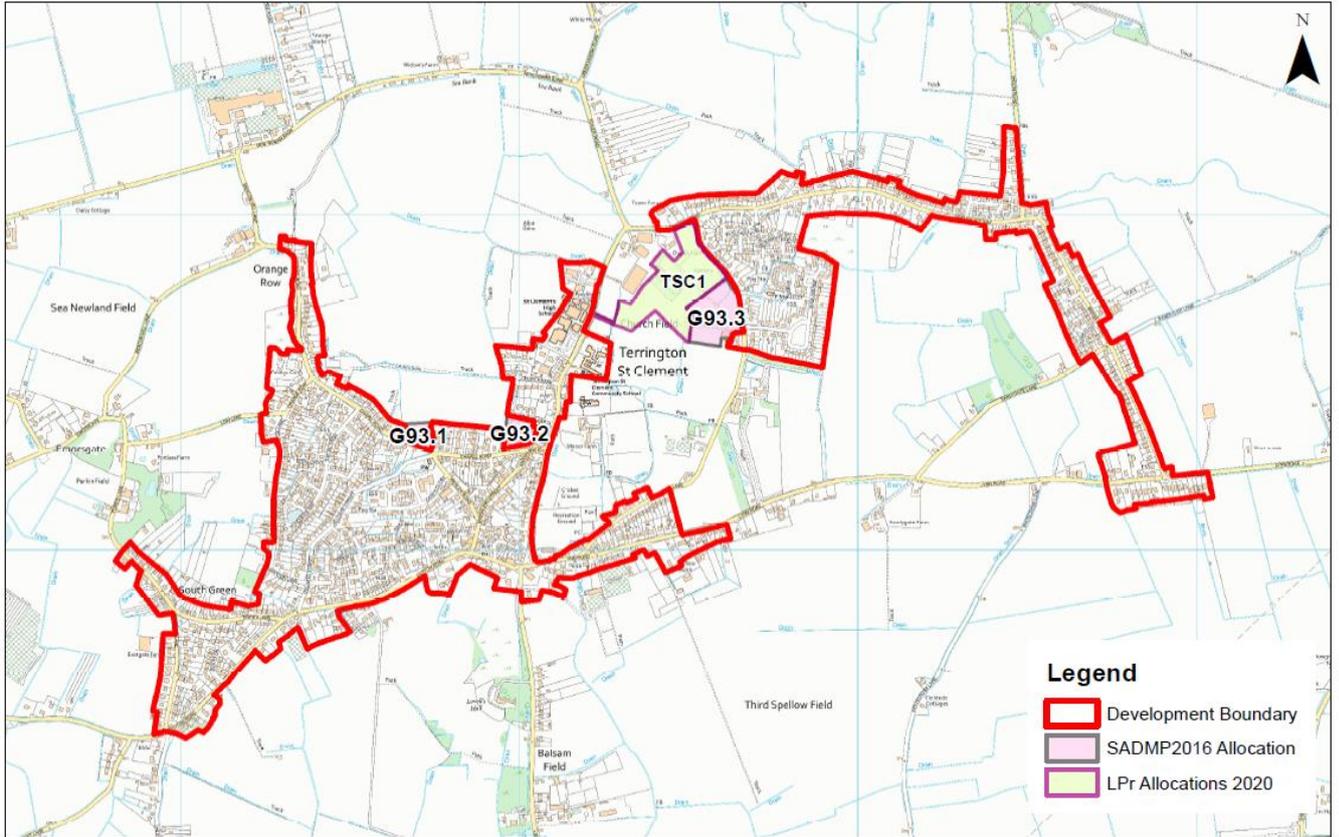
Description

Terrington St Clement is a relatively large marshland village situated to the north of the A17 road, 7 miles west of King's Lynn. The village church known as the 'Cathedral of the Marshland' dominates the surrounding fenland and forms the core of the village. The pattern of the village often follows the lines of sea defence banks and parts of the intervening spaces have been in-filled with development. The often-mature landscape gives the village a rural feel which is enhanced by frequent glimpses of open countryside.

A part of the settlement (north-east) is designated a Conservation Area to preserve and enhance its special architectural and historic quality.

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 (Census Data 2011).

Terrington St Clement is designated a Key Rural Service Centre because of the range of facilities available and its potential to accommodate growth to sustain the wider rural community. The SADMP (2016) made three residential housing allocations for at least 55 new dwellings. The Local Plan review seeks to carry these forward and also seeks to make a further allocation for at least 76 new dwellings. The site represents a rather unique opportunity to bring an un-used brownfield (previously-developed) parcel of land in a relatively central position back into active use.



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Terrington St. Clement

0 0.075 0.15 0.3 0.45 0.6
 Kilometers

G93.1 - Terrington St. Clement - Land at Church Bank, Chapel Road Policy

Site Allocation

Policy G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road

Land amounting to 0.5 hectare at Church Bank, Chapel Road, as shown on the Policies Map is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

1. Prior submission of a desk-based Archaeological Assessment of the site and proposed development;
2. A Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
3. Submission of details showing how the sewer crossing the site can be accommodated within the development (including any easements/diversions) to the satisfaction of Anglian Water;
4. Demonstration of safe access and provision of adequate improvements to local road network;
5. Provision of affordable housing in line with the current standards.

Site Description and Justification

The allocated site is situated in a central part of the settlement immediately adjacent the development boundary. The site comprises Grade 1 (excellent quality) agricultural land. Whilst development would result in the loss of productive agricultural land, this also applies to other developable site options in the village and there is an identified need for additional housing in the settlement. The land is flat grassland and other than boundary hedgerows there are no landscape features of importance on the site.

The site is situated in a built-up part of the village. The surrounding area comprises of existing housing development to the south, east and west with open fields to the north. It is considered that development on the site will not be visually intrusive in the landscape. Views are limited to near distance from adjacent roads and properties. Wider views are available from the north but in this view, development would be seen in the context of the existing settlement.

It is considered that development of at least 10 residential dwellings in this location will not be detrimental to the form and character of the area but would rather form a continuation of existing housing on Chapel Street, infilling the gap between existing housing to its east and west. The site is well integrated with the central part of the village and in close proximity to a number of services the village has to offer. This potentially provides opportunity for residents to walk or cycle to these amenities. Norfolk County Council as the local highway authority identifies the site to be well located

and made no objections to the allocation of this the site subject to localised improvements to the road network.

All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA (2019), therefore there are no sites located within a lower risk flood zone. The appropriate flood mitigation measures are required by the allocation policy above.

The site has come forward and benefits from full planning permission for 10 dwellings (17/01649/O & 19/01589/RMM).

G93.2 - Terrington St. Clement - Land Adjacent King William Close Policy

Site Allocation

Policy G93.2 - Terrington St. Clement - Land Adjacent King William Close

Land amounting to 0.7 hectare north of Chapel Road, as shown on the Policies Map is allocated for residential development of at least 17 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the Conservation Area and the setting of the nearby Listed Building (Grade 2 Listed Post Office);
2. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
3. Demonstration of safe access and adequate visibility being achieved, the details of which are to be agreed by Norfolk County Council as local highway;
4. Provision of affordable housing in line with the current standards.
5. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation.

Site Description and Justification

The site previously contained industrial buildings but these have since been demolished. Development of the site would allow the reuse of this previously developed land thus reducing the pressure to build on productive agricultural land. Landscape features within the site include boundary hedgerows but no other landscape features of note.

The site is located in a built-up part of the village. It is largely surrounded on all sides by existing housing. As such, the proposed development would relate satisfactorily with the existing character of the area. Views are limited to glimpses from adjacent roads and properties. There are few opportunities for long and medium distance views from the west, but in these views, development would largely be seen in the backdrop of the existing settlement.

The site's eastern boundary immediately abuts Terrington St Clement Conservation Area, there is a Listed Building adjacent the site (Grade 2 Listed Post Office) and access is proposed through the Conservation Area. Therefore, given its sensitive location, the design and layout of the development must be of a high standard that would conserve and enhance the setting of the Conservation Area and respect the settings of the Listed Building.

This site is identified as the highest scoring site, of those available in the village, in terms of proximity to services; it is well located with good links and provides an opportunity for residents to walk or cycle to key village services. Safe access into the site can be achieved from either King William Close or the junction off Churchgate Way adjacent the public house. King William Close is a private road, as such the developer would be required to bring it up to adoptable standards in order for access to be gained. Access could alternatively be obtained off Churchgate Way, at the junction next to the public house subject to adequate visibility being achieved. The policy ensures that the specific details regarding access be agreed by the local Highway Authority prior to the development taking place.

All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA (2019), therefore there are no sites located within a lower risk flood zone. The appropriate flood mitigation measures are required by the allocation policy above.

The site has come forward and benefits from full planning permission for 17 dwellings (19/00712/F). The majority of the site is complete.

G93.3 - Terrington St. Clement - Land West of Benn's Lane Policy

Site Allocation

Policy G93.3 Terrington St. Clement - Land West of Benn's Lane

Land amounting to 2.2 hectares west of Benn's Lane, as shown on the Policies Map is allocated for residential development of at least 35 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
3. Demonstration of safe access from Benn's Lane and the provision of adequate pedestrian/cyclist links;
4. Provision of affordable housing in line with the current standards.
5. Satisfactory accommodation of the Internal Drainage Board maintained drain crossing the site.
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and their settings

Site Description and Justification

The allocated site is situated north-east of the village of Terrington St Clement, with its eastern boundary abutting the development boundary. The site comprises brownfield land. The land currently accommodates derelict greenhouses which were previously used for horticultural purposes. Development of the site, reduces the pressure to build on greenfield productive land and also provides an opportunity to improve the existing derelict appearance of the site. Landscape features on the site include mature hedges along the site boundaries.

The surrounding area consists of residential road frontage development to the east, open fields to the south and west, and industrial land to the north. The site is well screened by mature hedges along the eastern site boundary. 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.

The site and the area north of the site is subject to a certificate of lawful use for B2 (general industrial) which was granted in 2010. There is currently no industrial development in the area but in order to avoid any conflicts between the proposed residential development and any future potential industrial uses north of the site, a policy is included as part of the allocation to ensure an explicit buffer area (minimum width of 30m) is provided along the northern site boundary as part of the residential development.

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.

In terms of access and proximity to services, the site is within reasonable walking distance to Churchgate Way where the majority of local services are situated including the primary and high schools, shops, public house, village hall, post office and bus stops. Site access is proposed from the existing access on Benn's Lane. Due to the nature of the southern part of Benn's Lane and the junction onto Lynn Road, it is recommended that appropriate works are undertaken, and the design and layout of the scheme should aim to encourage use of the Northgate Way junction and the northern part of Benn's Lane.

The size of the site is sufficiently large to accommodate at least 35 dwellings at a density consistent with the locality and also accommodate the aforementioned buffer area north of the site and address any other possible issues surrounding the drain within the site, site access and loss of hedgerows.

Whilst the site is within a high flood risk area (flood zone 3). All of Terrington St Clement is within the same flood zone. The site is suitable in terms of distance to services and proximity to the village. Development on the site is subject to the appropriate flood mitigation measures outlined in the policy above.

In summary, the Borough Council considers that this site provides an ideal opportunity for a well-located residential development on a derelict, brownfield site whilst also visually improving the area. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O). Should the wider area be allocated for development as proposed by this Plan, as TSC1, the buffer zone originally required by the SADMP policy is no longer required. This is because the two areas will be residential. Whereas the policy originally envisaged the buffer zone being required between a residential area and an employment area.

TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane Policy

Site Allocation

Policy TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane

Land amounting to 4.9 hectares, as shown on the Policies Map, is allocated for residential development of at least 76 dwellings.

Development will be subject to compliance with all of the following:

1. Demonstration of safe access from Northgate Way to the satisfaction of Norfolk County Council as the Local Highway Authority, the provision of adequate pedestrian/cyclist links, including a link through to Churchgate Way, and a pedestrian, cycle and road link to the adjacent land allocated as G93.1;
2. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
3. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
4. Satisfactory accommodation of the Internal Drainage Board maintained drain crossing the site;
5. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency’s ‘Guiding Principles for Land Contamination’;
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and Grade 2 Listed Tower House and their settings. This should be accompanied by an Archaeological Field Evaluation of the site, if required;
7. Provision of affordable housing in line with the current standards.

Site Description and Justification

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 for the larger site (18/00940/OM).

The site has brownfield status as it was granted a certificate of lawful use for B2 General Industrial purposes in 2010. In the past the site hosted a horticultural business, it currently comprises a range of semi-derelict / derelict structures associated with this. 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 Greenfield, the site therefore represents an opportunity to develop a brownfield site that has a very limited current use and ensure it makes a positive contribution 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).

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.

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.

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.

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.

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 north side 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.

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.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Kate Green (Avison Young / Hayford)	Support	<p>Key Rural Service Centres – 12.19 Terrington St Clement</p> <p>The SADMP (2016) allocated three development sites adjacent to Terrington St Clement with a combined capacity of at least 55 dwellings. These comprise:</p> <ul style="list-style-type: none"> • G93.1 – Land at Church Bank, Chapel Road; • G93.2 – Land adjacent King William Close; and • G93.3 – Land west of Benn’s Lane. <p>The land west of Benn’s Lane now has planning permission for 44 dwellings (Application Reference: 16/02230/OM).</p> <p>The Local Plan Review proposes that at least an additional 26 dwellings be delivered within or adjacent to the settlement and proposes an additional allocation south of Northgate Way.</p> <p>Heyford is supportive of the Council’s approach to Plan making, which echoes the presumption in favour of sustainable development set out at Paragraph 11 of the NPPF. Point B states that “strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.” This is reinforced at Paragraph 35, Point ‘A’, which defines the concept of ‘positively prepared’.</p> <p>Furthermore, the settlement has a good range of services and facilities and is well served by public transport. It is a sustainable location for growth and can accommodate development without giving rise to adverse effects or placing a strain on the settlement’s infrastructure.</p>	N/A	The support is very much noted
Peter Humphrey		My Client is in agreement with the identification of Terrington St	Add the Kerkham Close	Please see the Local Plan

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Clement, within the Key Rural Settlement category within the settlement hierarchy in the emerging local plan. This reflects the range of local services and facilities that the village supports and provides to lower order settlements surrounding.</p> <p>It is considered that in order to support and maintain the local services an increased allocation of housing to the village is necessary. The promoted site (Kerkham Close) was offered in the SHLAA and has been subject to a previous application which just missed the 5 year land supply window. Within the consideration of the planning application 16/00309/OM the submission addressed all significant matters, however ultimately it was refused on development outside the development boundary and lack of overriding need for the housing. As a result of this refusal the council also determined that the site failed the exception test; however as set out below it did pass the sequential test.</p> <p>The planning application and concluded that there were no overriding constraints to development with no objections from consultees in respect to the application; in addition it was concluded that the flood risk was equivalent to that elsewhere in the village and that this could be mitigated through detail design in accordance with the site specific FRA which was submitted with the application. In relation to ecology- the site is part of a single flat field which has been intensively farmed for arable crops. Other than the ditches on the road frontage and the eastern and western boundaries to the site there is no potential for ecological interest. It is noted that the Government Magic website indicates that the site is not significant for protected habitat or protected species in other than the widespread designation for farmland birds. Should the LPA be minded to incorporate the site as an allocation we can provide a phase 1 ecological report as necessary.</p>	<p>site as a new allocation Terrington St Clement, it is sustainable and deliverable and could come forward immediately or at another point within the development plan timeframe</p>	<p>review Sustainability Appraisal</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>It is noted that the sites allocated in the SADMP have all come forward and have permission.</p> <p>It is however questioned as to whether the new allocation is the best solution having regard to wider sustainability matters.</p> <p>It is contended that the promoted site at Kerkham Close (H360) is better related to many of the core services and facilities in the village and is easier to access them along Lynn Road and if this cannot be considered as an alternative to the new allocation then it could come forward as an addition to it to provide up to 33 new dwellings including affordable homes. It is noted that the new allocation is currently subject to an outline planning application and is due for determination in May. It is acknowledged in the ctte report pursuant to the Kerkham Close site that it is a sustainable and suitable site for development and the only reason for refusal was the development boundary</p>		
Mrs Elizabeth Mugova (Environment Agency)	Suggestion	<p>G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road:</p> <p>12.19.1.5 – ‘In line with the sequential test, the site is located in a lower flood risk area compared to other higher flood risk sites in the settlement. The appropriate flood mitigation measures are required by the allocation policy above.’</p> <p>Clarify how this conclusion has been reached. The site is entirely within Flood Zone 3 and in an area shown to flood on EA THM.</p>	Clarification	<p>The site has already been through the Local Plan process, it is allocated having been found ‘sound’. It now benefits from outline planning permission (17/01649/OM) and a reserved matters (19/01589/RMM) has also been approved (27/01/2020). It is proposed to updated this text: All of Terrington St. Clement is located within</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				Flood Zone 3 according to the BCKLWN SFRA2019, therefore there are no sites located within a lower risk flood zone. and update the position with regards to site progress as above.
Ms Debbie Mack (Historic England)	Object	G93.2 - Terrington St. Clement - Land Adjacent King William Close: Object - Given this site's location, we welcome the recognition given to the conservation area and listed buildings in the draft policy and supporting text. It is not clear which listed building is being referred to in the policy; this would benefit from clarification. We note that the site was allocated in the previous plan and now benefits from full planning permission.	Identify which listed building in the policy and supporting text	Amend policy and text to reference the Grade 2 Listed The Old Post Office. It should be noted that the site is already allocated and benefits from full planning permission
Mrs Elizabeth Mugova (Environment Agency)	Suggestion	G93.2 - Terrington St. Clement - Land Adjacent King William Close: Site Description and Justification There is no detail in this section to demonstrate how flood risk has been considered.	The site is within Flood Zone 3 and therefore justification for allocating the site should be provided. Demonstrate how the sequential test has been carried out.	Update text : All of Terrington St Clement is located within Flood Zone 3, therefore there are no available sites located within a lower risk flood zone. The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from full planning permission (17/01450/FM). Indeed the site is currently under construction with 12 of 17

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				dwelling permitted complete (28/08/2019)
Ms Debbie Mack (Historic England)	Object	G93.3 - Terrington St. Clement - Land West of Benn's Lane: Object - Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south west of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.	Amend policy and text to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.
Kate Green (Avison Young / Hayford)	Suggestion	G93.3 - Terrington St. Clement - Land West of Benn's Lane: The land west of Benn's Lane is proposed to be allocated for the development of at least 35 dwellings within the Plan. The policy wording specifically sets out a list of criteria which future development will be required to meet in order to be supported and found acceptable. Notwithstanding this, the Plan (Paragraph 12.19.3.9) recognises that the site has come forward inasmuch that it benefits from an outline planning permission (dated 04th April 2018) for the demolition of existing structures currently located within the site boundary and the erection of up to 44 dwellings with means of site access from Benn's Lane. The Council notes that the proposed allocation of the site affords an opportunity to develop a redundant brownfield site in a sustainable location adjacent to the settlement boundary of Terrington St Clement, thereby reducing the pressure to build on Greenfield land and thus supporting the overarching principles of the National Planning Policy Framework (2019). Heyford is supportive of the Council's proposed allocation,	Notwithstanding the above, the premise of development for up to 44 dwellings on the land west of Benn's Lane is therefore supported by the Council through the granting of permission. Consequently, the wording of the Policy G93.3 should be revised and updated to reflect this	The site has planning permission for 44 dwellings which is consistent with the allocation policy for at least 35 dwellings. No amendment suggested

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>however, would recommend that the policy wording is reviewed to reflect the outline permission granted for up to 44 dwellings (Application Reference: 16/02230/OM).</p> <p>The planning application package and submission of technical evidence demonstrates that the site's constraints have been thoroughly assessed to determine the suitability of the site for this quantum of development (44 dwellings). As such, the technical assessments conclude that a sustainable development supporting the following benefits can be realised:</p> <ul style="list-style-type: none"> • Provision of a buffer to mitigate the impacts of the adjacent employment uses on future residents; • An appropriate flood mitigation strategy for flooding and surface water drainage. This includes the implementation of a Sustainable Urban Drainage pond and discharge into the New Cut Drain, as approved by the Internal Drainage Board (IDB). The proposals further confirm that access to the New Cut Drain will be maintained for the IDB. • Safe access and egress to the site, including the provision of highway and pedestrian improvements along Benn's Lane to Northgate Way; and • The provision of 20% affordable housing. <p>It should be noted that a detailed Contamination Assessment, in line with the criteria set out in the draft policy wording, will be submitted and agreed through an application to Discharge Conditions.</p>		
Kate Green (Avison Young / Hayford)	Support	Avison Young have submitted a planning application (ref: 18/00940/OM), on behalf of Heyford Developments Ltd, in relation to the land south of Northgate Way and west of Benn's lane, Terrington St Clement, which forms a draft allocation (TSC1) in the		Support appreciated and noted

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Local Plan Review 2019. In terms of the aforementioned planning application, this was submitted last year and was validated on 06th June 2018. As a result of the submission, the application has been subject to an extensive period of consultation, including with the Environment Agency. The Environment Agency first commented by letter dated 26th June and confirmed that they had no objections to the proposed development subject to a condition to ensure the subsequent proposals implemented the mitigation measures as detailed in the supporting Floor Risk and Drainage Strategy. The Agency also commented on a Flood Plan, the Internal Drainage Board, Flood Resilient Measures and Flood Warning. In relation to those comments, I can confirm that the IDB have been consulted with regard to flood risk associated with their watercourses and the surface water drainage proposals and permission has been granted to discharge surface water into the New Cut Drain. A secondary consultation exercise was undertaken to consider amendments to the proposed masterplan and, again, the EA confirmed their support for the application stating they had no further comment to add to their letter dated 26th June 2018 (email dated 10th October 2018). The application is now being held in abeyance and a call is scheduled for the 26th June with the case officer and principle planner to discuss the progression of the application. Regarding the recent consultation undertaken in respect of the Local Plan Review, representations were made by myself, on behalf of Heyford, and others on Policy TSC1 (the proposed development site) including from the Environment Agency, who made the following comments: "Can residual risk (EA THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?" We consider their above comments to conflict with those made in relation to the</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>aforementioned planning application, which as I mentioned, raise no objections to the proposed development. I have since made contact with the officer who made the above comments to the Local Plan and she has confirmed that the LPA should satisfy themselves that the location of development, where possible, should avoid flood risk to people and property. We feel that this has been suitably demonstrated through the Flood Risk Assessment and Drainage Strategy submitted within the application and supported by both the LLFA and EA. I therefore wanted to write to you and, in the first instance, make you aware of the difference between the two sets of comments provided by the Environment Agency and, secondly, offer mine and the applicant's support during the Council's preparation of the Local Plan Review. Should you require any further information or evidence to support the draft allocation of the land south of Northgate Way and west of Benn's Lane, and therefore satisfy the Inspector at Examination that the site is suitable for allocation within the Local Plan, then please do not hesitate to contact myself on the below details</p>		
Ms Debbie Mack (Historic England)	Object	<p>G93.3 - Terrington St. Clement - Land West of Benn's Lane: Object - Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south of the site and the grade II listed Tower House to the north of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.</p>	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.	<p>Amend policy and text to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Norfolk County Council Transport	Comment	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: Subject to vehicle and pedestrian access onto Churchgate Way and providing a through road. Vehicular access onto Churchgate Way is considered essential if possible to avoid impact on the sub-standard Benn's Lane		The allocation policy is in line with the planning application which NCC HA have said is acceptable/ no objection. No action proposed
Mrs Elizabeth Mugova (Environment Agency)	Comment	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: Can residual risk (EA THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?		EA raise no objection to the planning application (18/00940/OM). Site allocation will be carried out in accordance with the BCKLWN SFRA 2019 & The EA / BCKLWN Protocol for Sites at risk to flooding. Policy and text contain relevant flooding clauses/information. Update supporting text accordingly. As above plus: 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 a KRSC, it is centrally located and is classed as previously developed land.
Kate Green (Avison Young / Hayford)	Support	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: The land south of Northgate Way is proposed to be allocated for a development of at least 76 dwellings. The Council notes that such a scale of development would exceed the 'at least 26 dwellings' proposed for the		Support appreciated and noted

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>settlement but, quite rightly concludes that the allocation represents an opportunity to develop a brownfield site that has a very limited current use, ensuring that it makes a positive contribution to the local area and housing supply. This, it goes on to say, is very much in line with current Government thoughts as set out within the NPPF. It also notes that developing here may compensate for the fact that suitable sites for development may not be found in all KRSCs. Heyford agrees with the Council's assessment and is supportive of the proposed allocation. Moreover, Heyford can confirm that the site is suitable, available and deliverable. This can be demonstrated through the submitted planning application and the technical assessments prepared in support of the proposed uses. In this context, the benefits of developing the proposed site have been assessed against the criteria set out in the proposed policy wording and can therefore be surmised as follows:</p> <ul style="list-style-type: none"> • The delivery of up to 76 dwellings on a redundant brownfield site adjacent to the settlement boundary of a Key Rural Service Centre, in line with the Plan's housing needs targets and the objectives set out in the NPPF (2019). • Ability to provide safe access and egress to the site from Northgate Way, as demonstrated in the supporting Illustrative Masterplan. Heyford have received confirmation from Norfolk County Council as the Highways Authority in support of the revised access proposals. • Provision of pedestrian and cycle routes to Churchgate Way and the potential opportunity to extend this to the adjacent draft allocation located to the east of the development proposal (G93.3) as demonstrated in the Illustrative Masterplan. • The provision of an appropriate mitigation strategy for flooding 		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>and surface water drainage. In this context surface water will be drained into the watercourse network via a proposed connection into the existing drain to the west of the site boundary. To facilitate the proposed development and to ensure the required easements are provided, a diversion of the New Cut Drain will be required along the south-eastern edge of the site. The Internal Drainage Board confirmed their support for this method of discharge through a notice of intention to grant consent dated 21st September 2018.</p> <ul style="list-style-type: none"> • The protection and enhancement of nearby heritage assets, notably the Grade I Listed Church of St Clement and its associated Grade I Listed Tower. The submitted Heritage Assessment confirms that the proposed development would not impact or harm the archaeological, architectural or common values of the adjacent heritage assets due to the existing vegetation located in the churchyard which impede any view from the proposed development site. • The delivery of up to 20% affordable homes, in line with the proposed policy (LP25) which sets out the requirements for development sites outside of King's Lynn. Notwithstanding this and as set out in our comments responding to Policy LP25, clarification is required regarding the total proportion of affordable housing attributed to sites located outside of King's Lynn. <p>Furthermore, it should be noted that Heyford are commissioning additional technical surveys to be undertaken to address outstanding issues, including a detailed Contamination Assessment and remediation strategy.</p> <p>It should further be noted that details of the management and maintenance of the proposed SuDs will be the subject of on-going discussions with the Local Planning Authority. In the event that</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>these are not adopted, a plan will be prepared and agreed with the Authority in line with an appropriately worded planning condition. As demonstrated above, the planning merits and benefits associated with the development of the proposed site can be realised and have been appropriately assessed by Heyford. Therefore, the site's allocation for 76 dwellings is supported in line with the objectives of the draft Local Plan and national planning policy guidance.</p>		

Appendix 2: TSC1 Site Illustrative Masterplan



PROJECT	CLIENT	ILLUSTRATIVE MASTERPLAN	Drawing Number	Rev.	Date	townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH E.kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789
Land at Northgate Way, Terrington St Clement	Heyford Developments		IMW-01	J	28-09-18	

Appendix 3: NCC HA response to TSC1 Planning Application 18/00940/OM



Community and Environmental
Services
County Hall
Martineau Lane
Norwich
NR1 2SG

Natacha Osler
Borough Council of King's Lynn & West Norfolk
Kings Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX

NCC contact number: 0344 800 8020
Text Relay - 18001 0344 800 8020

Your Ref: 18/00940/OM
Date: 29 October 2018

My Ref: 9/2/18/0940
Tel No.: 01603 228948
Email: andrew.willeard@norfolk.gov.uk

Dear Natacha Osler

**Outline Application: Erection of 76 dwellings with means of site access following demolition of existing structures
TERRINGTON ST CLEMENT - Church Farm Distribution Depot Northgate Way / Bennis Lane**

As you will be aware the County Council have consistently stated that we do not support further development at this location, largely due to the sub-standard nature of the southern end of Benn's Lane.

However, the amended proposal shown on drawing 3418-01 rev B provides an acceptable access direct to Northgate Way, not Bennis Lane. Whilst, this would not prevent vehicular traffic from using Bennis Lane, Northgate Way is constructed to an acceptable width for this scale of development. Therefore, access to the wider highway network is clearly possible without the need to use Bennis Lane and any impact on it is likely to be minimal.

As a consequence, despite our longstanding view of development in this location. The County Council no longer considers we could substantiate a recommendation of refusal. Therefore, should the Borough Council deem this application to be acceptable, in relation to highway matters, the County Council would not wish to raise an objection to the granting of planning permission subject to imposing appropriate conditions

Yours sincerely

Andrew Willeard

Engineer (Major and Estate Development)
for Executive Director for Community and Environmental Services

www.norfolk.gov.uk

LP37 – Rural Areas Policy

Link to the draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759462#section-s1542882759462>

Officer Recommendations to Task Group:

Policy remains the same as consulted upon

Consideration of issues:

A mixture of comments were displayed within LP37 Development in Rural Areas. Over half of the comments that were received were supportive of the policy which we welcome. Other comments expressed different concerns including the deletion of specific criteria or changing the wording. The criteria that brought interest to the consultees who objected were criterion 3, 6 and 7.

- With criterion 3 which focuses on most new development in rural areas being within Growth Key Rural Centres and Key Rural Service Centres, attention here was either to make the wording more flexible to allow settlements in close proximity to be included within this focus and that Rural Villages should also be placed within this principle.
- Involving Rural Villages within criterion 3 also leads onto one consultee wanting criterion 6 to have rural villages removed from this point; so rural villages and SVAH are treated within the same point.
- Criterion 7 brought attention to consultees who object policy LP26 and wish for this criterion to be deleted

Policy LP37- Development in Rural Areas

13.1.3 The strategy for rural areas is to:

1. promote sustainable communities and sustainable patterns of development to ensure strong, diverse, economic activity, including farm/agricultural diversification (see also Policy LP06);
2. maintain local character and strive for a high-quality environment;
3. the focus of most new development in the rural areas will be at Growth Key Rural Centres and Key Rural Service Centres selected from the Settlement Hierarchy Policy LP02;
4. ensure employment, housing (including affordable housing), services and other facilities are provided in close proximity to settlements;
5. focus on improving accessibility between towns and villages so helping to reduce social exclusion, isolation and rural deprivation;
6. in the Rural Villages and Smaller Villages and Hamlets, more modest levels of development, as detailed in Policy LP25, will be permitted to meet local needs and maintain the vitality of these communities where this can be achieved in a sustainable manner, particularly with regard to accessibility to housing, employment and services and without detriment to the character of the surrounding area;
7. housing development could take place within inside settlement development boundaries if judged to be in accordance with LP04. It may also take place outside of these development boundaries if judged to be in accordance with LP26;
8. within all centres and villages priority will be given to retaining local business sites unless it can be demonstrated that any proposal for change accords with Policy LP06;
9. sites may be allocated for affordable housing or exception housing to support the housing strategy;

10.support may also be given for entry level exception sites;

11.beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all.

13.1.4 Policy LP37 contributes to Objectives 6, 7, 9 Society, 14, 15 Environment, 28, 29, 30, 31 Rural Areas 34 Coast, New Norfolk Coast AONB Policy

Supporting text:

LP37 Development in Rural Areas (previously CS06)

Introduction

13.1.1 The Council will continue to encourage a strong hierarchy of rural settlements by developing competitive, diverse and thriving rural enterprise that supports a range of jobs. Rural settlements provide essential services and facilities to serve visitors to the borough as well as the local communities.

13.1.2 The Borough Council's approach to housing in rural areas will seek to sustain rural communities, identifying a need for both affordable and market housing. Rural exception sites can be used to enable the Council to deliver affordable housing in rural communities on sites not otherwise available for residential development

Sustainability Appraisal

LP37 Rural Areas

This policy has been updated from the CS ones to reflect the adoption of the SADMP, proposals within the Local Plan review and new programmes which are now in place. Consequently, the SA scores for the new policy are similar to those of the original CS one's par objective 18. Objective 18 now scores '++' instead of O and this because a range of rural areas are in the process of their neighbourhood plan which we are supporting and helping the local community with their aspiration and active community involvement within preparing and adopting this planning document.

Given this having the old policy remain is not really an option as this doesn't reflect the current situation accurately. Not having policies to cover the area, would result in a lower score and would not reflect the sustainability objectives of the borough council as well.

LP37: Rural Areas																								
223	SA Objective:																							
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	+	-	Overall Effect	
LP37	+	O	O	+	O	+	+	O	O	O	O	O	O	O	O	++	++	+	++	+	++	+14	0	Likely Positive Effect +14
CS06	+	O	O	+	O	+	+	O	O	O	O	O	O	O	O	++	++	+	O	+	++	+12	0	Likely Positive Effect +12
No Policy	-	+/-	+/-	+/-	+/-	+/-	-	+/-	+/-	O	-	O	O	O	O	+	+	O	+	+	+11	-10	Likely Mixed Effect	

Consultees	Nature of response	Summary	Consultee modification	Officer response
Ms Debbie Mack, Historic England	Support	Support- we welcome criterion 11 of the policy	n/a	Noted- we welcome the support
Mrs Sarah Watts, West Winch Parish Council	Suggestion	West Winch Parish Council comments that broadband and high-speed connections are still not up to standard in rural areas. Work from home should be an option, not an alternative, to reducing the use of the car, or poor public transport modes. Constant use of technology could be a health hazard.	n/a	Noted- no further action
Ed Durrant, Pigeon Investment Management	Support	1.46 We support the promotion of sustainable patterns of development to ensure strong, diverse, economic activity but do not believe that this should be constrained by the settlement hierarchy of settlements in Policy LP02. 1.47 We support the fourth criterion of Policy LP37 to 'ensure employment, housing (including affordable housing), services and other facilities are provided in close proximity to settlements. This approach to development clearly supports	Suggested change: 1.50 The third criterion of Policy LP37 should be amended to allow greater flexibility for growth in smaller settlements, where they form functional clusters with higher order settlements. The wording of the third criterion of Policy LP37 should be amended as set out below: 13.1.3 The strategy for rural areas is to: 3. the focus of most new development in the rural areas will be at Growth Key	We welcome the support to the overall policy. In reference to changing the wording to allow more flexibility for the growth in smaller settlements this change will not take place. The settlement hierarchy sets out the approach taken for focusing where most development would be appropriate. Windfall development and LP26 allows for flexibility also where deemed suitable in smaller settlements or

		<p>the argument for further employment sites to be considered near to larger settlements, like Pigeon's site in Snettisham.</p> <p>1.48 Like Policy LP02, Policy LP37 only allocates 'modest' levels of development in the Rural Villages. Notwithstanding this, it does acknowledge the positive impacts that this development can have on maintaining the vitality of these communities where this can be achieved in a sustainable manner. Given the example of Ingoldisthorpe, which is near to the services at higher order settlements, Policy LP37 should allow for more than just 'modest' growth in this Rural Village.</p> <p>1.49 Whilst Pigeon supports the aim of conserving and enhancing the countryside this has to be balanced against the need to boost the supply of housing in accordance with paragraph 59 of the NPPF. Where countryside is not of any intrinsically recognisable character or beauty, has limited landscape, heritage or wildlife</p>	<p>Rural Centres and Key Rural Service Centres selected from the Settlement Hierarchy Policy LP02 or those smaller settlements, in close proximity to higher order settlements, where growth would achieve sustainable development;</p>	<p>adjacent to the settlement hierarchy.</p>
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		benefit, then its loss should be part of the balancing act when considering the benefits of delivering new homes.		
Mr Ian Cable	Support	Support	n/a	We welcome the support
Mr & Mrs J Clarke	Support	Support	n/a	We welcome the support
Mr D Russell	Support	Support	n/a	We welcome the support
Mr L Aldren	Support	Support	n/a	We welcome the support
Mr D A Jones	Support	Support	n/a	We welcome the support
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Support	The County Council supports the inclusion of a Policy for the rural areas and supports the objectives of the policy including: <ul style="list-style-type: none"> • Promoting sustainable communities and sustainable patterns of development; • Supporting diversification; • Improving accessibility. The County Council would support Local Plan policies which aim to protect the rural economy and services/facilities such as public houses, local shops and valued facilities.	n/a	We welcome the support
Mrs Erica Whettingsteel, EJW Planning Limited	Mixed	Policy LP37 is too long, too detailed and repeats policy set out elsewhere within the plan. It needs to be condensed such	Appropriate levels of growth to make villages and rural communities more sustainable will be supported.	Given the nature of the Borough we believe that the detail is necessary within the

		that it is succinct, consistent with national policy and is shown to be positively prepared	<p>Growth Key Rural Service Centres and Key Rural Service Centres identified in the Settlement Hierarchy will be the focus for most development. In smaller villages and rural communities, the type and scale of development will reflect the need to maintain the vitality of these communities.</p> <p>Housing In villages not identified for a specific level of growth in the settlement hierarchy, residential development will only be permitted where;</p> <p>a) Where there are suitable sites available within or adjacent to the settlement boundary; or</p> <p>b) It involves the appropriate re-use of a rural building or a previously developed site; or</p> <p>c) It is an affordable housing scheme or exception scheme that supports the housing strategy.</p>	<p>policy, it has been positively prepared and is consistent with the NPPF.</p> <p>No change</p>
Mr Michael Rayner, CPRE	Mixed	CPRE does not agree with the need for Policy LP26 enabling	Point 7. Remove - It may also take place outside of these	Noted- This criterion (7) will not be removed due to LP26

Norfolk		development to take place outside settlement boundaries, particularly smaller rural settlements, where any such development is likely to be unsustainable. This would be contrary to point 11 which states: "beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all."	development boundaries if judged to be in accordance with LP26	is a policy which will stay in the plan.
Mr & Mrs Gerald Gott	Object	We do not support LP37 (6) for two reasons: a) it treats development in Rural Villages, Smaller Villages and Hamlets in the same way, contrary to Policy LP02; and b) it does not comply with paragraphs 77 and 78 of the NPPF 2019 by restricting development to modest levels of development. Policy LL37 (7) is also contrary to paragraph 78 of the NPPF as it only allows housing development outside development boundaries if it is in	Delete criterion 3 and replace with the following: "the focus of new development in the rural areas will be at Growth Key Rural Centres, Key Rural Service Centres and Rural Villages." Delete reference to Rural Villages in criterion 6. Delete criterion 7.	We do not agree with this point. The policy is consistent with the NPPF and changing the wording for criterion 3 would not be appropriate to treat Rural Villages the same as GKRC and KRSC. Rural villages have a limited need in supporting the sustainable growth of new development in rural areas so by focusing most new development to be within Rural Villages as well as GKRC and KRSC will be in contrary with LP02 and

		<p>accordance with LP26. This policy only permits residential development where it is adjacent to existing settlements. Policy LL37 (11) is contrary to paragraph 78 of the NPPF as it perpetuates the theme of protection of the open countryside for its own sake and its limitations are inimical to the balanced approach to the balanced approach which the NPPF 2018 exhorts.” The Inspector went on to say: “The NPPF has never and still does not exhort a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The draft policy as worded obviates a balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour.”</p>		<p>the settlement hierarchy. Criterion 6 and 7 also will remain the same.</p> <p>No change.</p>
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Draft Policies – Denver

Link to draft policy and comments in full received from the draft consultation stage:

Denver: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759494#section-s1542882759494>

G28.1 Denver - Land South of Sluice Road: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1550646974419#section-s1550646974419>

Summary of Issues Raised: (Please see Appendix 1 for comments and responses)

- Minor modifications to the Site Allocation G28.1 made by the SADMP. This it to reflect the latest situation and appreciation of the local context
- Suggested amendment to the development boundary

Conclusions & Recommendations:

- Accept/make the minor modifications to the Site Allocation G28.1
- Continue forward with the development boundary for Denver as adopted by the SADMP

G28.1 Denver - Land South of Sluice Road Amendments

The examiner of the SADMP was very keen for the Borough Council to have a site allocation at Denver. It was described by the examiner at the herring session as a rather unique situation given both the services and facilities within the village and the proximity to a main town in Downham Market. In essence a very sustainable location. Extract from the examiner's report:

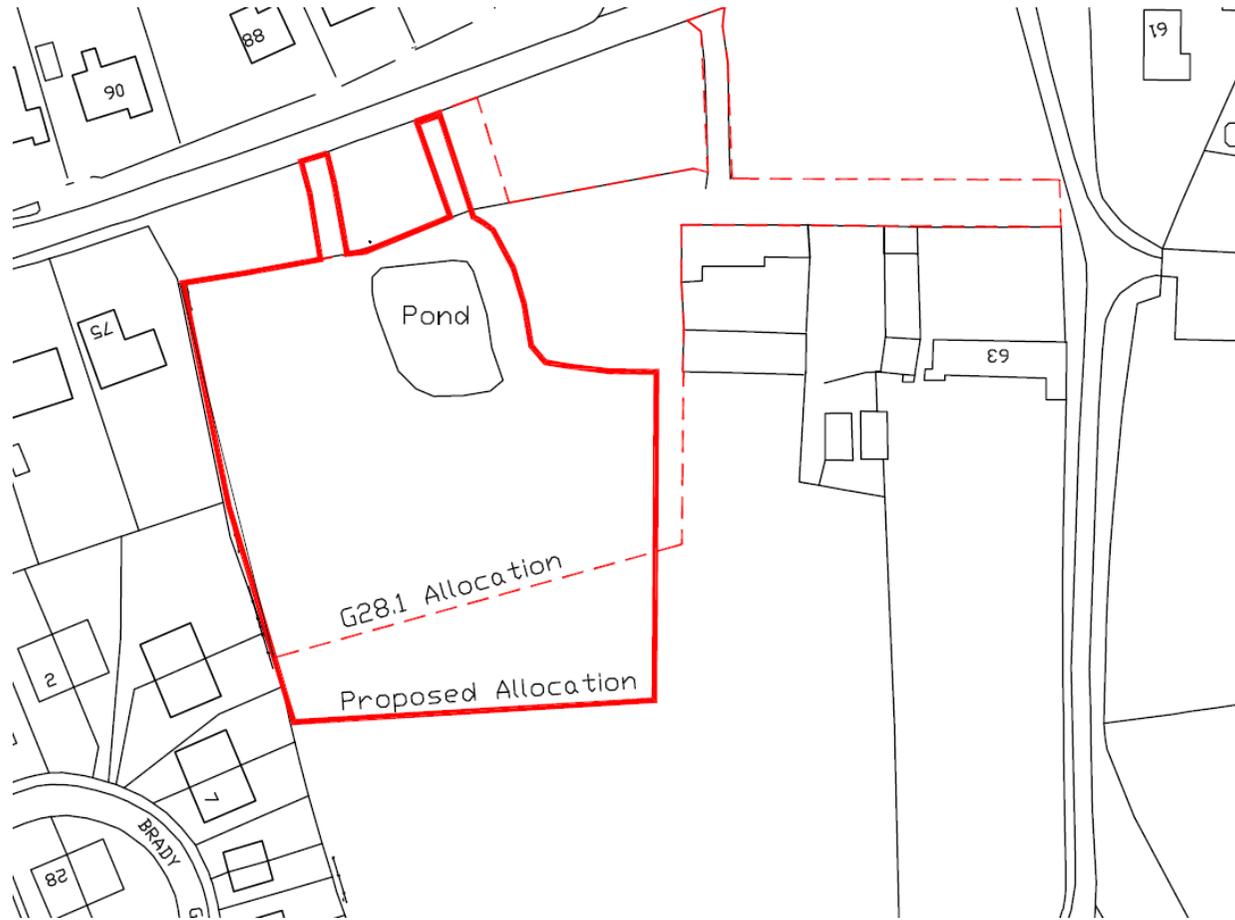
Denver

107. Denver is identified as a rural village and it lies only one mile south of Downham Market which enjoys a range of facilities and services. In other circumstances the Council suggests that the village should have an allocation of 8 dwellings but because of constraints relating to common land, wildlife habitats and access it was not proposed to make any allocations in the settlement.
108. At the preferred options stage in 2013 a site was allocated (Site DEN1) but it was discounted by the Council because access to it is across common land, there is a pond where great crested newts may be present and there is a Grade II listed building nearby. However, following the hearing, evidence was submitted at my request¹⁰ which confirms that there is a right of access across the common land; that measures would be put in place to protect the newts; and that there would be no significant harm to the setting of the listed building.
109. As a consequence of this further evidence the Council has decided to allocate a site to the south of Sluice Road for at least 8 dwellings. I agree that such an allocation is justified and represents an appropriate strategy for the settlement. The policy includes a number of requirements but there is no evidence that would suggest that they cannot all be successfully provided. **MM37** is therefore recommended.

The agents for the site have come forward with a pre-application. This seeks approval for a scheme that is slightly different to that which is allocated within the SADMP. For completeness the Agent also sent the Planning Policy Team several documents to justify this and requested that the Local Plan be amended to reflect this. The changes can be summaries as follows:

- The original Site Allocations area includes now redundant tracks across the common and land which was sold away with the adjacent Barns.
- It also includes the old stack yard which has a Group TPO's on its perimeter trees.
- The reduced site can still accommodate the number of dwellings required by the policy "at least 8". The total will need to below the Adoptable roadway threshold of 10 homes. Consequently, the pre-app and indicative layout shows 9 dwellings.
- It is proposed that the Site Allocations Boundary is amended to exclude areas which are no longer relevant, allow for management of the ecology pond and agricultural field access but amend the southerly and eastern field boundaries to allow for comfortable density and layout for 9 dwellings.
- The overall Site Allocations size was 0.6Ha and is would now be 0.54Ha.
- Please see below for site area and indicative layouts and Appendix 2 for full justification.

Given the emphasis of the examiner and subsequently that the Borough Council's adopted Local Plan contains the allocation it is a site that the Borough Council would very much like to see come forward and be delivered. It is debatable that site could still come forward as outlined in the pre-app without making changes to the Local Plan allocation as the proposal is broadly in line with the allocation policy. However, given the timing and for completeness it is recommend that these minor changes are incorporated in the Local Plan review.





Sustainability Appraisal:

Site Ref	Site Sustainability Factor										
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste	Climate Change
SADMP G28.1	+	+	O	x	+	#	+	#	#	#	+/#
LPr G28.1	+	+	O	x	+	#	+	#	#	#	+/#

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Denver - Sustainability Appraisal – Site Commentary, Discussion & Conclusion

The site agent has come forward with a pre-application and as part of this has suggested changes to the Local Plan to reflect the latest situation and additional works which have been undertaken. These minor changes proposed to the Denver site allocation, as summarised below, do not impact upon the scoring of the site. However, they do represent latest situation with regard to the site and how the site is likely to come forward and be developed (as envisaged at this time).

- The original Site Allocations area includes now redundant tracks across the common and land which was sold away with the adjacent Barns.
- It also includes the old stack yard which has a Group TPO’s on its perimeter trees.
- The reduced site can still accommodate the number of dwellings required by the policy “at least 8”. The total will need to be below the Adoptable roadway threshold of 10 homes. Consequently, the pre-app and indicative layout shows 9 dwellings.
- It is proposed that the Site Allocations Boundary is amended to exclude areas which are no longer relevant, allow for management of the ecology pond and agricultural field access but amend the southerly and eastern field boundaries to allow for comfortable density and layout for 9 dwellings.
- The overall Site Allocations size was 0.6Ha and is would now be 0.54Ha.
- Please see below for site area and indicative layouts and Appendix 2 for full justification.

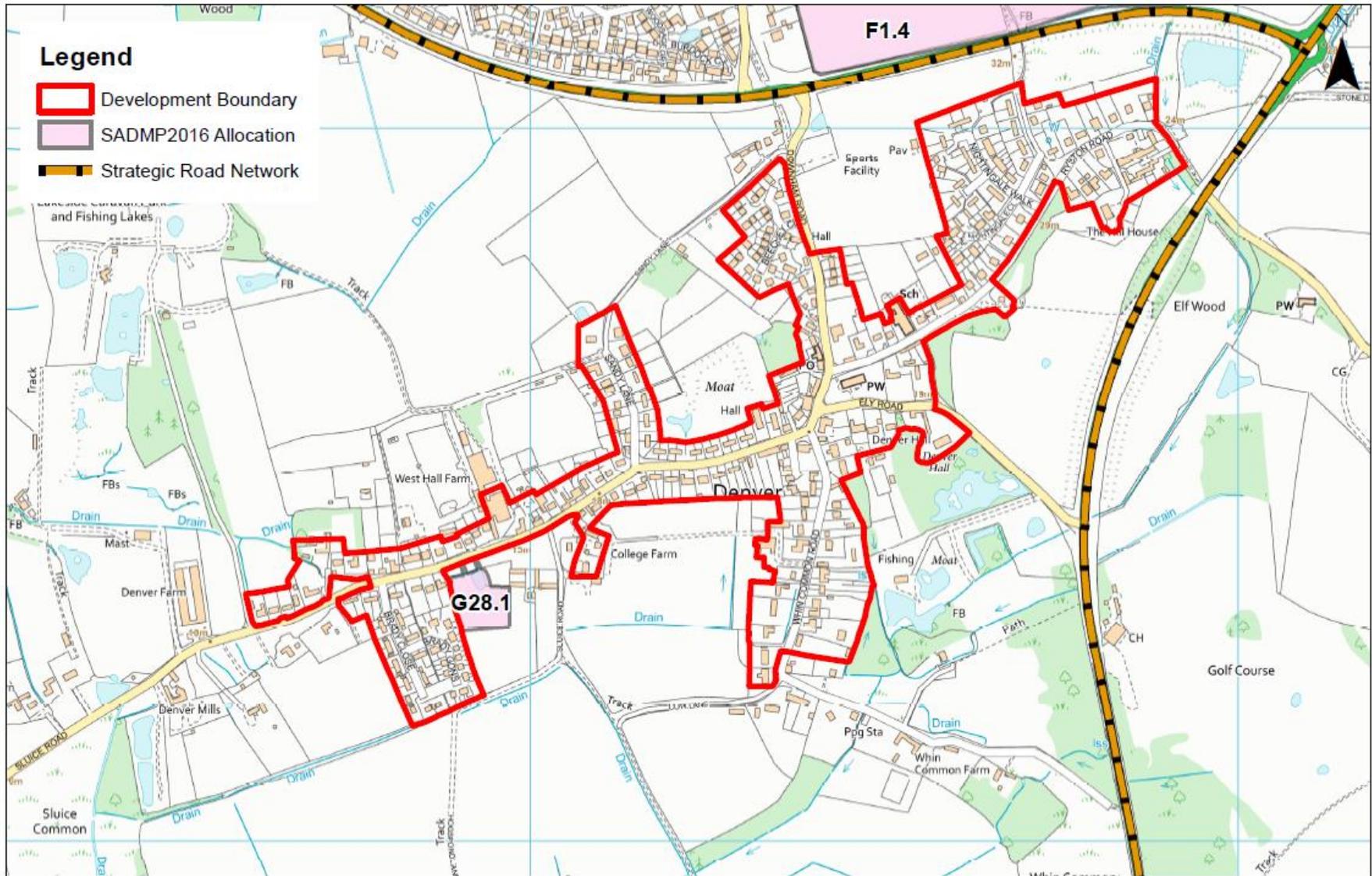
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The indicator 'Climate Change' has been incorporated since the SADMP was adopted and represents an important part of the Local Plan review. The score for both the existing allocation and the proposed amendment is '+/#' positive/dependent upon implementation. This is because the site is located within Denver which benefits from a range of services/ facilities locally including primary school, church, village hall, shop with post office, playing field, public house. It is also only a short distance from the main town of Downham Market (which benefits from train station). The two settlements are linked by the local footpath network, bus network, national cycle route. The site is located within Flood Zone 1. The design of the houses and wider scheme will need to consider climate change and as the full details of this are not known at this time, on balance the score of '+/#' is awarded for this factor.

It should be noted that the examiner of the SADMP was very keen for the Borough Council to have a site allocation at Denver. It was described by the examiner at the hearing session as a rather unique situation given both the services and facilities within the village and the proximity to a main town in Downham Market. In essence a very sustainable location.

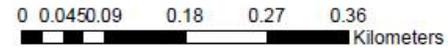
Given the emphasis of the examiner and subsequently that the Borough Council's adopted Local Plan contains the allocation it is a site that the Borough Council would very much like to see come forward and be delivered. It is debatable that site could still come forward as outlined in the pre-app without making changes to the Local Plan allocation as the proposal is broadly in line with the allocation policy. However, given the timing and for completeness it is recommended that these minor changes are incorporated in the Local Plan review

After consideration and balancing the factors these minor changes to the site allocation are proposed to be made



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Denver



Development Boundary: Comments received from both Mr Garner & Mrs Garner propose that the development boundary for Denver is amended along Sluice Road to include existing dwellings on the south side to a similar point to those included on the north side of the road, to reflect the existing built environment. The following map is provided:





Policy 4/20 In order to protect important undeveloped spacious or well-treed areas which contribute to the character of towns and villages, development will not be permitted in areas defined on the Proposals Map as:

- i) Built Environment Type A;
- ii) Built Environment Type B unless it is ancillary to the existing principal building or, involves the alteration, extension or change of use of existing buildings and, where such development would not disturb the spatial relationship between existing buildings and their open or heavily treed settings.

This area was included within one of the four built type environments in the 1998 Local Plan Built environment B (see above). Given the 1998 Local Plan Policy 4/20 the area of land was omitted from the SADMP development boundary for Denver. Policy DM2 Development boundaries explains the policy and the approach in removing the four environment types and replacing them with a single development boundary. Development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied. The boundaries are not intended to necessarily reflect the full extent of existing built development or of settlements. They exclude parts of settlements where further development is not encouraged. For these reasons it is not considered appropriate to include the area land proposed.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Helen (Denver Parish Council)	?	?	?	No comments registered. No action
Mr A Garner	suggestion	The development boundary should be extended along Sluice Road to include existing dwellings on the south side to a similar point to those included on the north side of the road, to reflect the existing built environment. See attached document page 2.	Development boundary amendment suggested	See Development Boundary section above
Mrs A Garner	suggestion	The development boundary should be extended along Sluice Road to include existing dwellings on the south side to a similar point to those included on the north side of the road, to reflect the existing built environment. See attached document page 2.	Development boundary amendment suggested	Same as above
Ms Debbie Mack (Historic England)	Support	G28.1 Denver - Land South of Sluice Road: Support - Whilst there are no designated heritage assets within this site, a grade II listed Manor Farmhouse lies directly adjacent to the site. Development of the site therefore has the potential to impact the setting of this listed building. We note that reference is made to the listed building within the policy which is welcomed.		Support is duly noted and appreciated

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Appendix 2:

**JUSTIFICATION STATEMENT
MINOR AMENDMENT TO LOCAL PLAN
G28.1 SITE ALLOCATION**

for

**NEW DWELLINGS WITH PARKING & TURNING;
CONSTRUCTION OF A NEW HIGHWAYS ACCESS**

LAND TO SOUTH OF SLUCE ROAD, DENVER

JANUARY 2020

Agent:

ROBERTS MOLLOY
architects & consultants
3 Church Lane
Bressingham
Diss, Norfolk
IP22 2AE

Tel: 01379 687705

1. Introduction

A pre-application enquiry was submitted to establish the level of housing development Borough Council of Kings Lynn & West Norfolk would support, on a site located adjacent to and opposite housing in Denver. A minor variation of the site is within the adopted Local Plan for development (identified in Policy G28.1) and allocated for a minimum of 8 dwellings, overall site area 0.62Ha.

Due to constraints around the existing pond as a Suds solution and also a wildlife habitat, therefore not suitable for development, it is suggested that the allocation red line could be amended to the south (proposed allocated site 0.56Ha) to provide a better development of dwellings. Also, the original allocation included tracks and property on the Common which are not logically included in the future development allocation. These have been removed as shown below.



**AERIAL VIEW OF SITE – dashed red outline shows allocated site G28.1.
Buffer to Listed Building & barns shown blue.**

2. Proposed Development

For discussions at this stage we submit a location plan which shows the previously allocated extent of development into the field. It is proposed to revise the extent whilst not increasing the allocation in hectareage, in fact there is a small reduction from 0.62 to 0.56 Hectares. The revision to the allocation site will allow the 8-9 houses required in the Local Plan, but will provide a more accurate area for development, excluding the pond and the adjacent old stack yard which is surrounding by TPO'd trees.

3. Scale

A mix of 1 & 2 storey dwellings is currently suggested for the site to replicate house scales found in close proximity to the site. Dwellings will have a mixture of open bay parking, shared or private garaging – all garaging to be single storey with traditional pitch detailing. Houses to the east of the development, facing the Listed Manor Farm house are shown as single-storey, to reduce any impact on the adjacent Barns and farmhouse.

4. Biodiversity

Ecological surveys have been undertaken in conjunction with the previous Planning Permission works to Manor Farm Barns and also as part of the justification for the development site to be included in the call for sites ahead of publication of the now adopted Local Plan. The development site itself is under-used meadow land, cut periodically.

Previous mitigation was for 3no. bodies of water to the East of the site to be established so that any Great Crested Newts could translocate from the existing poorly maintained and fed pond prior to the commencement of any development. Due to the length of time which has passed since the latest report (4years), additional works are required to confirm if the existing pond is still a suitable habitat or if it is no longer suitable for the site and whether the establishment of additional ponds and the infilling of the existing pond is still best practice or if a more appropriate mitigation is now suggested. **For this reason, for pre-application purposes we propose to retain the pond and its connection to the wider landscape.**

5. Affordable Housing

In line with local requirements – on a site of 9 dwellings, on-site provision is not required, so off-site contribution would be applied in line with local Policy.

6. Landscaping, Trees and Access

There is a ring of trees around the old stack yard which are covered by an 'Area Tree Protection Order'. The Limes and Chestnuts within this group were identified for protection in 1954. Under this site allocation amendment proposal no works would be proposed in this area and therefore no further works would be undertaken. Further works may be required, and some management needed to preserve the long-term health of this group of trees within the village. Removal of this area from the developable allocation will avoid any threat to the trees and will not impose any influence on the layout or any Root Protection Areas and any 'no dig' driveway constraints.

This area will continue to provide an agricultural vehicle route from the road to the rear and side meadow, which is an important wildlife habitat but would otherwise be land-locked, meaning sensible agricultural management of the meadow would not be possible. The current permitted agricultural track across the Common to the road would therefore be retained as a low-impact track.

The new residential access would be on a new route as shown on the plans, subject to agreement with the Common owner. Please see attached correspondence from the Common Reeve.



Existing field access across Common land, design response is to retain this in its current form and locate new access to the west on the opposite side of the pond

7. Surface Water Drainage

It is assumed for Pre-Application advice that a suitable sUDS system can be accommodated on site utilising the existing pond for additional attenuation. Sufficient space is available on site to allow for surface water to be managed within the confines of the site.

Rural Villages

Please note that general tidying of the wording which appeared in 2019 consultation version of the draft Local Plan review will be undertaken to reflect the current situation. This will be in relation to neighbourhood plans, local services which may have changed, housing numbers, and progress of any allocations which were made by the SADMP (2106) for example:

- Any changes as a result of the comments revied are highlighted in **Bold**
- Comments received by Historic England (HE) and the Environment Agency (EA) are considered in separate papers
- Comments relating to development boundary changes are also considered in a separate paper
- Denver, due to comments received by the landowner/agent of the SADMP (2016) allocate site, is also considered in a separate paper dedicated to the village.

Appendix A shows all the Rural Villages section with the new highlighted yellow text

Table of comments for the Rural Villages Section

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ashwicken	Mr Dale Hambilton	Support	Provides additional support for Site H002	Allocate Site H002	Due to the relatively small number of new homes through the draft Local Plan review required to meet the Local Housing Need (LHN) new housing allocations were not proposed to be distributed below Key Rural Service Centres. It is possible now to meet the LHN through the Local Plan review without any further housing allocations. Therefore, we will not be considering this site further in the Local Plan review. It is recommended that the consultee reviews Policy LP26 with regard to possible windfall sites. It is however proposed to remove the second paragraph of the Ashwicken chapter for clarity regarding searching for a site at

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					Ashwicken
Burnham Overy Staithe	Mrs Sarah Raven (BOS PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
Denver					For comments and consideration please see separate paper on Denver
East Winch	Christine Wyman	Suggests	Suggests inclusion of land within the development boundary	Include land within the development boundary	Please see development boundary paper
	John Maxey	Proposal	Proposes additional site	Allocate site	Housing numbers are calculated across the Borough. Allocations are expressed as at least, windfall sites have and will continue to come forward, so the fact that 3 dwellings might not have come forward here as suggested doesn't mean that a further site is required here in order to meet the Local Housing Need (LHN). This site benefits from full planning permission (15/01793/OM,

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					18/0897/RM, 19/00863/RM) for 10 dwellings and development of the site has started.
	Debbie Mack (Historic England)	No comment	No comment	N/A	Noted
	Bob Parnell (East Winch PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
	Helen Steele (East Winch PC)	Advice	Some of the information in this para is incorrect. East Winch school has been closed for over 10 years. There is no 'School Road'	At 14.5.1. delete 'School Rd' and substitute 'Church Lane'. At 14.5.2. delete 'a school', so that the line now reads 'a regular bus service ...'	Make the changes suggested for accuracy
Fincham	Dr A Jones	Proposal	Include his land within the development boundary for Fincham	See summary	See separate development boundary paper
G36.1 Fincham - Land East of Marham Road	Debbie Mack (Historic England)	Comment	The Fincham Conservation Area lies to the south of the site but is separated by some buildings. We note that this site benefits from outline planning permission for 5		Noted / See Separate HE paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			dwellings.		
Flitcham	Gill Welham (Flitcham PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
Great Bircham/ Bircham Tofts	Debbie Mack (Historic England)	No Comment	No comment	N/A	Noted
Harpley	Linda Steed (Harpley PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
G45.1 Harpley - Land at Nethergate Street/School Lane	Debbie Mack (Historic England)	Support	Support - We welcome the requirement for an archaeological field evaluation		Support very much appreciated.
G48.1 Hilgay - Land South of Foresters Avenue	Debbie Mack (Historic England)	Support	Support - We welcome the requirement for an archaeological desk-based assessment		Support very much appreciated.

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Hillington	Mrs Caroline Boyden (Hillington PC)	Suggests	The plan should include reference to The Norfolk Hospice located off Wheatfields as it is significant Borough/County-wide resource for both in and out patients. The Hospice generates traffic to and from the site on a daily basis from clients, volunteers, employees and fundraising events. The map should also be changed to include the site Reference to the pub should be expanded as there have been significant re-development on the site. The Ffolkes provides accommodation, banqueting facilities as well as being a pub and restaurant.	Please see summary	The response is much appreciated. Update description accordingly
	Mr Michael Rayner (CPRE Norfolk)	Suggests	The published map does not show the recently constructed Tapping House Hospice, off Wheatfields, and therefore gives a false impression of the developed extent of the settlement. The hospice is shown on online maps using the Ordnance Survey dataset. The	Please see summary	The map used was the latest of that type produced by Ordnance Survey. We will of course endeavour to use the latest map of this type, which may have now picked this up.

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			existence of the hospice should be a consideration regarding any further development in Hillington.		
G49.1 Hillington - Land to the South of Pasture Close	Debbie Mack (Historic England)	Support	Support - We note that it is proposed to de-allocate this site from the Local Plan. Given the potential archaeological constraints together with the potential impact on the setting of Up Hall, Historic England would welcome the de-allocation of the site		Support noted and applied
	Mrs Caroline Boyden (Hillington PC)	Support	The Parish Council supports the proposal to de-allocate if unlikely to become available		Support noted and applied
Ingoldisthorpe	Debbie Mack (Historic England)	No Comment	No comment	N/A	Noted
	Mrs Jenifer Shah (Ingoldisthorpe PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
	Mr James Wilson x2	Proposals	Resubmission land east of 53-57 Lynn Road and Resubmission - site land to the east of 151-161 Lynn Road, Ingoldisthorpe	Allocate the sites proposed	Due to the relatively small number of new homes through the draft Local Plan review required to meet the Local Housing Need (LHN)

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					new housing allocations were not proposed to be distributed below Key Rural Service Centres. It is possible now to meet the LHN through the Local Plan review without any further housing allocations. Therefore, we will not be considering this site further in the Local Plan review
Old Hunstanton	Mrs Glynis Allen (OH PC) x2	Various views points	<ul style="list-style-type: none"> Strongly disagrees with the inclusion of HELAA Ref H253 Objects to 'At Least' CPRE Pledge <p>Old Hunstanton's Neighbourhood Plan is under development. It is anticipated that it will reinforce the BCKLWN draft plan in the following areas:</p> <ul style="list-style-type: none"> Support of a high calibre communications network Improvement of accessibility through public 		<p>The Borough Council will assist and support the OH NP. The Local Plan review is designed to support this also. The representation is very much appreciated.</p> <p>Site H253 does not form part of the Local Plan review. The Neighbourhood Plan can take a view on sites and allocate if it so wishes. The HELAA is a technical document that assess if there is enough land available within the Borough to meet the Need.</p>

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
			<p>transport</p> <ul style="list-style-type: none"> • Maintaining the unique nature of West Norfolk and retaining its own local distinctiveness • Maintaining the local character and high-quality environment of rural coastal areas • Maintaining Old Hunstanton as a rural village with limited growth • Support of LP23 protecting local open space and ensuring that Old Hunstanton remains separate from adjacent settlements • Support of LP26 infill policy • Support of LP28 enlargement/replacement dwellings policy 		<p>It does not allocate sites nor does it grant permission. This is the role of the Local Plan and the development management respectively.</p> <p>‘At least’ forms a key part of the Local Plan and was required in order for it to be found sound. Please see the SADMP Inspector’s Report. It has assisted with 5-year land supply and the housing delivery test.</p>
Runcton Holme	Tim Slater	Proposal	Provides information supporting the allocation of land at Manor Farm, Runcton Holme	Allocate the site	Due to the relatively small number of new homes through the draft Local Plan review required to meet the Local Housing Need (LHN)

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					new housing allocations were not proposed to be distributed below Key Rural Service Centres. It is possible now to meet the LHN through the Local Plan review without any further housing allocations. Therefore, we will not be considering this site further in the Local Plan review
	Debbie Mack (Historic England)	No Comments	No comment	N/A	Noted
	Pippa Wilson (North Runcton PC)	CPRE Pledge			Generic letter from CPRE signed by the PC. No action proposed. CPRE should engage with MHCLG regarding housing numbers.
	Mr J Sandle	Proposal	Support for his site as an allocation or included within the development boundary	See Summary	Due to the relatively small number of new homes through the draft Local Plan review required to meet the Local Housing Need (LHN) new housing allocations were not proposed to be distributed below Key Rural Service Centres. It is

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					possible now to meet the LHN through the Local Plan review without any further housing allocations. Therefore, we will not be considering this site further in the Local Plan review. The approach is not to include sites within the development boundary unless they have been built out/completed.
	Mr and Mrs D Caley	Proposal	Resubmission of site H296	Allocate Site H296	Due to the relatively small number of new homes through the draft Local Plan review required to meet the Local Housing Need (LHN) new housing allocations were not proposed to be distributed below Key Rural Service Centres. It is possible now to meet the LHN through the Local Plan review without any further housing allocations. Therefore, we will not be considering this site further in the Local Plan review.
	Mr & Mrs J		The development boundary	See summary	Please see separate paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Clarke		should be extended along School Road to the east to include existing dwellings on the south side, including existing holiday park, social centre and allocated site with extant planning permission and school to the north side. This representing the 'hub 'of the village.		regarding Development Boundaries
Sedgeford	Debbie Mack (Historic England)	No Comments	No comment	N/A	Noted
Shouldham	Ms Debbie Mack (Historic England)	N/A	No comment	N/A	Noted
Stowbridge	Mr D Russell	Object	Proposed development boundary change	Extend the boundary	Development boundaries are being dealt with in a separate paper
Syderstone	Ms Debbie Mack (Historic England)	N/A	No comment	N/A	Noted

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Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Ten Mile Bank	Ms Debbie Mack (Historic England) Mrs Elizabeth Mugova (Environment Agency)	Supporting	No comment from Debbie and include wording on FRA in G92.1	Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Noted, the policy G92.1 will be removed from the plan due to the allocation is now built out.
Thornham	Heritage Developments Ltd Ms Sarah Bristow (Thornham PC)	Mixed	Comments refer to allocating a mixed-use holiday accommodation site and comments on development respecting design, parking provisions, and needed allocations		We respect the comments put forward. The Parish are undergoing a neighbourhood plan which the borough council supports Thornham on this process. Allocations put forward should be liaised with the parish council for consideration.
Three Holes	Mr J Maxey Ms Debbie Mack (Historic England)	Mixed	Proposed development boundary extension by J Maxey and raised	Extend area designated within development	Note the comment by Historic England. Development boundary

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	Mr Graham Moore (Middle Level Commissioners)		concerns on the allocation G96.1	boundary as shown in blue on attached plan	comments are being dealt with in a separate paper. The concerns raised for G96.1 are noted, however this allocation will be removed from the plan due to the site has been built out.
Tilney All Saints	Ms Debbie Mack (Historic England) Mr Andrew Laughton Mr Robert Sloan Mrs Stella Kaye (TAS Parish Council) Mrs Irene Auker	Mixed	Comments referred to the objection of sites put forward for allocation and specifically objections towards these. Also, the reference to TAS process in the neighbourhood plan and support of the DB and not allocation further sites.	N/A	We respect the comments put forward. The Parish are undergoing a neighbourhood plan which the borough council supports Tilney All Saints on this process.
Walpole Highway	Ms Debbie Mack (Historic England) Mr Peter Humphrey Wisbech	Mixed	No comment from Historic England, suggestion has been made to amend the development boundary including HELAA site H432.	Amend the development boundary to Walpole Highway to include the site identified as a rounding off.	Note the comments- development boundaries are being dealt with in a separate paper

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Walton Highway	Mr J Maxey Ms Debbie Mack (Historic England) Mr Darren Riley Mr Peter Humphrey	Mixed	Variety of proposals for new allocations within the plan and no comment by Historic England. Also questioning on why Walton Highway has been relegated to a rural village.	Add H430, H462, WEW1	Latest housing numbers suggest no need to allocate further sites through the Local Plan review. To answer why Walton Highway has been relegated to a rural village. it was a political decision made by the members: This settlement drops to this category from a former joint KRSC, as despite a high population, its offer is relatively low in terms of facilities and services.
Welney	Mr J Maxey Mr Graham Moore (Middle Level Commissioners) Miss Debbie Mack (Historic	Mixed	Comments which refer to site policy G113.1 specifically referred to local flood risk and on-site water management. Comments on site policy G113.2 were objections on the site relate	Delete numbered point 2 in the policy as now completed for G113.1 Delete site. G113.2 If maintaining allocation, change conserve to	Note the comments made and have reflected the deletion of point 2 in policy G113.1 Site G113.2 has come forward with a full

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
	England)		to the historic environment and concern with water issues.	preserve	planning proposal. Rewording the policy will be supported and changed accordingly.
Wereham	Ms Debbie Mack (Historic England) Mrs Helen Richardson (Wereham Parish Council)	Mixed	No comment from Historic England and Generic CPRE Pledge by the Parish Council	N/A	Noted.
Wiggenhall St. Germans	Ms Debbie Mack (Historic England)	N/A	No comment	N/A	Noted
Wiggenhall St. Mary Magdalen	Ms Debbie Mack (Historic England) Mr John Magahy	Mixed	No comment from Historic England and explanation on the loss of the site G124.1 due to deliverability issues cannot take place prior to 2030. Allocation of H484 has been proposed to compensate the deallocation of G124.1.		Note the comments. Latest housing numbers suggest no need to allocate further sites through the Local Plan review. Deallocation has been taken on board and will be removed accordingly from the plan

Section	Consultee(s)	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
					and the map will be updated.
Wormegay	Mr Richard Waite	Mixed	Resubmission site H515	N/A	Latest housing numbers suggest no need to allocate further sites through the Local Plan review.

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Appendix A: Rural Villages Section Text & Maps- Amended text is highlighted in yellow

14 Rural Villages

Rural Villages

6. Rural Villages (32)

Ashwicken	Harpley	Stow Bridge	Walton Highway
Burnham Overy Staithe	Hilgay	Syderstone	Welney
Castle Rising	Hillington	Ten Mile Bank	Wereham
Denver	Ingoldisthorpe	Thornham	West Newton
East Winch	Old Hunstanton	Three Holes	Wiggenhall St Germans
Fincham	Runcton Holme	Tilney All Saints	Wiggenhall St Mary Magdalen
Flitcham	Sedgeford	Walpole Cross Keys	Wimbotsham
Great Bircham/ Bircham Tofts	Shouldham	Walpole Highway	Wormegay

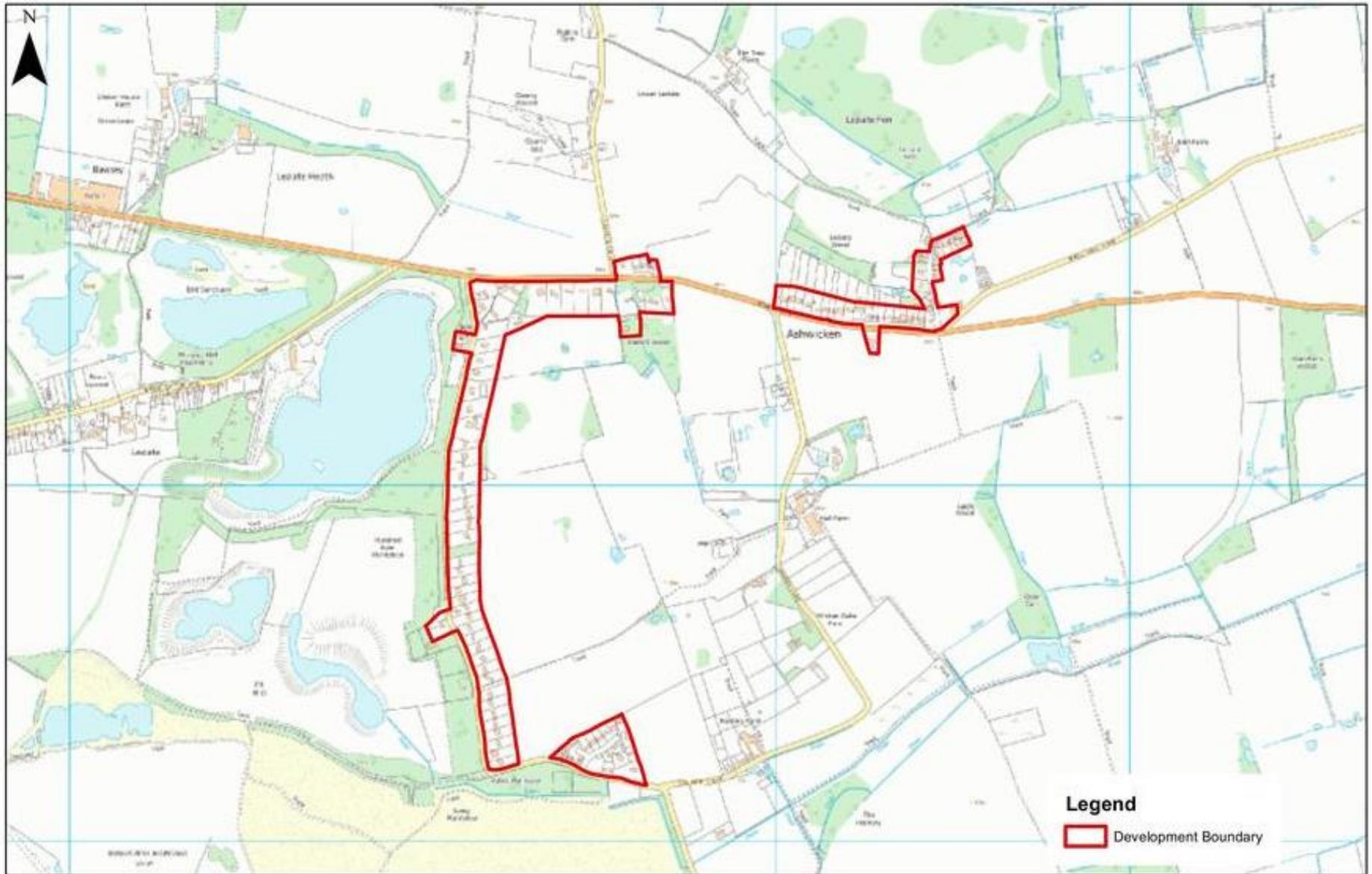
Ashwicken

Rural Village

Description

Ashwicken is a small village that falls within Leziate Parish, five miles east of King's Lynn. The village has a scattered form with part falling south of the B1145 road along East Winch Road and part along the B1145 itself. Leziate Parish has a population of 592 (Census Data 2011). (Ashwicken itself is estimated at 467). The services in the village include a primary school, a church and bus service.

~~Ashwicken is designated a Rural Village capable of accommodating modest growth to support essential rural services. The SADMP 2016 sought to make an allocation for 5 new dwellings. However, no suitable development site was identified in Ashwicken in terms of form, character and highway constraints, and results of consultation.~~



Burnham Overy Staithe

Rural Village

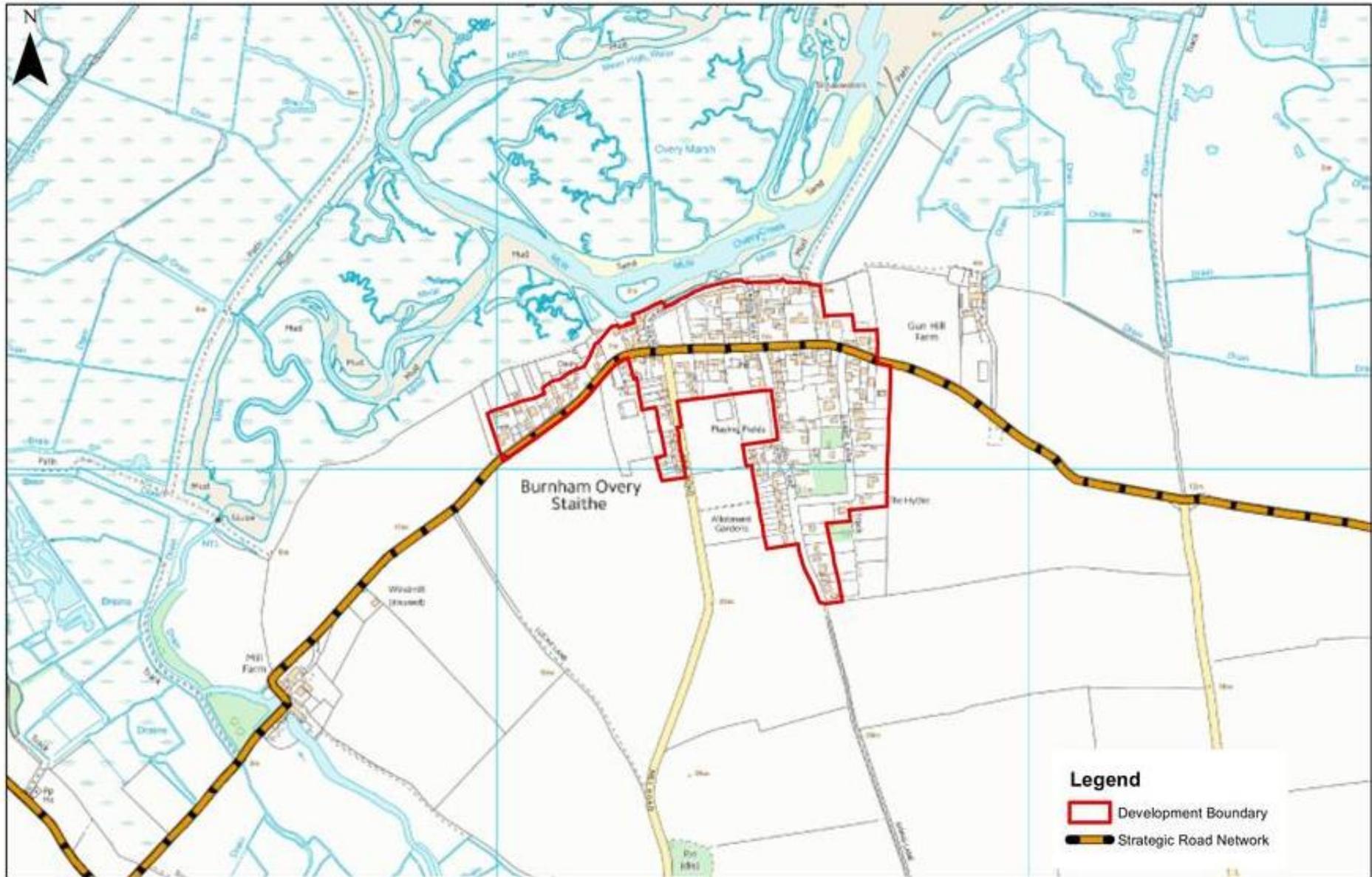
Description

The small-nucleated village of Burnham Overy Staithe in the Norfolk Coast AONB nestles at the edge of Overy Creek and Marshes. The village lacks convenience facilities and a school but does have a pub, a small harbour and facilities related to recreational sailing.

The diverse mixture of orange brick and pantile traditional buildings, with contrasting chalk clunch, flint and pebble facings are distinctive characteristics of buildings in the village which is designated a Conservation Area. Burnham Overy Parish has a population of 134 (Census Data 2011)

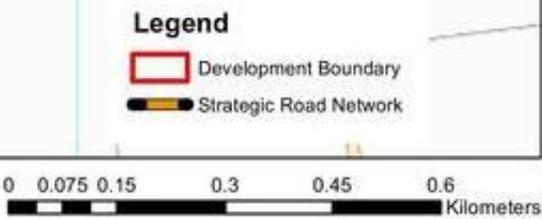
Burnham Overy Staithe has the smallest parish population of all designated 'Rural Villages' in the settlement hierarchy. It is in a particularly sensitive location, within the Area of Outstanding Natural Beauty, on the edge of the undeveloped coastline subject to a number of national and international designations for its environmental and heritage significance.

The SADMP (2016) method of distributing new development indicated that an allocation of one new house would be sought. Due to the minimal level of housing sought in the settlement and the level of constraints to development identified, the Borough Council did not allocate any new houses in Burnham Overy Staithe. This decision was supported by Burnham Overy Parish Council and the Norfolk Coast Partnership. **The Local Plan review doesn't alter this, and no further housing allocations are sought here.**



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Burnham Overy Staithe



Castle Rising

Rural Village

Description

Castle Rising is a small, historic village with a population of just 216 (Census Data 2011) and is approximately five miles northeast of King's Lynn. The settlement contains a small number of services including tea rooms, a furniture shop, a pub and the Church of St. Lawrence. A greater number of services are located nearby in North Wootton and South Wootton. Older buildings in the village have been constructed using local materials including local bricks, Carrstone and Silver Carr. Castle Rising contains a significant 12th Century Castle which is a Scheduled Ancient Monument and is a visitor attraction in the village.

Castle Rising has a small population size and an average level of services for its designation as a Rural Village, except for a lack of a primary school.

~~The SADMP 2016 indicated that an allocation of 2 new houses would be sought. However, the Borough Council was unable to identify any sites suitable for development within the constraints of the area.~~

Denver

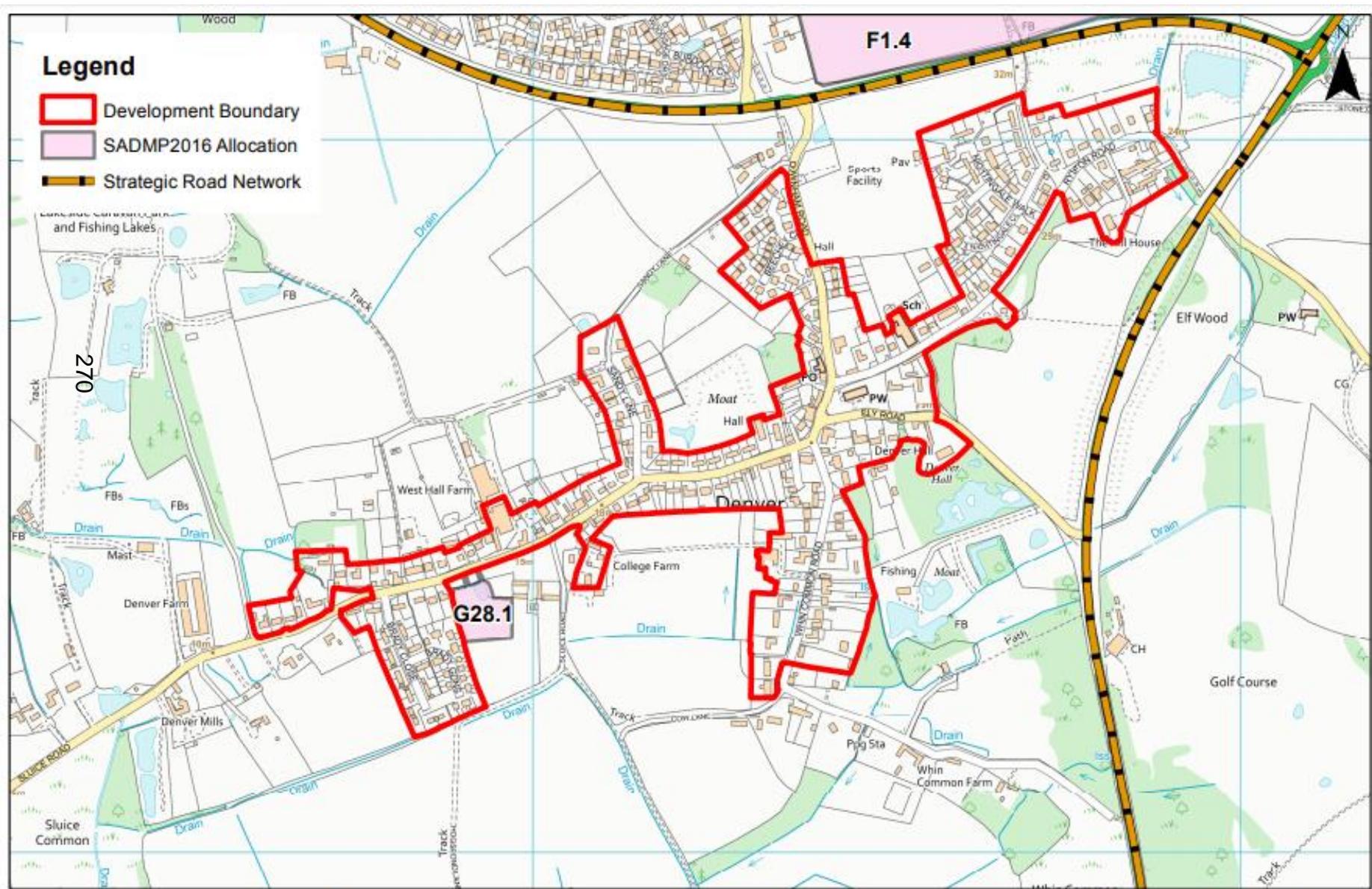
Rural Village

Introduction

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 (Census Data 2011).

Denver is designated as a Rural Village and is considered to have a good range of services and facilities. The Site Allocation and Development Management Plan 2016 did make an allocation of at least 8 new dwellings. The Local Plan review carries this forward with some minor amendments to area of the allocated site to reflect the current situation with regards to the site.

G28.1 Denver - Land South of Sluice Road



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Site Allocation

Site Description and Justification

The allocated site is situated in the southern area of the settlement immediately south of Sluice Road. Between the site and Sluice Road there is a thin strip of common land, the site owner has provided information that an agreement with the common land owner in relation to rights across this land has been agreed in principle and the local highways authority state the site is considered appropriate for inclusion within the plan with this access point. The site is considered capable of accommodating at least 8 residential at a density reflecting that of the surrounding area.

The site lies immediately adjacent to the development boundary. The site is located a short distance from a bus stop and relatively close to other village services including the school. The site is classified as Grade 3 agricultural land but is currently uncultivated. Whilst development would result in the loss of undeveloped land, this applies to all potential development options.

There are some protected trees located towards north east of the site, the site will need to consider how to respond to this in the design of the development. A pond occupies a relatively central position within the site and there is documentary evidence of Great Crested Newts, the policy includes a clause to ensure that an ecological survey report and mitigation plan is submitted. The survey needs to show whether protected species are present in the area or nearby, and how they use the site. The mitigation plan needs to show how the development will avoid, reduce or manage any negative effects to protected species.

The site is well integrated with the village and development will be well screened on the west by the existing development at Brady Gardens. The majority of the views into the site are limited to near distance from School Road and adjacent properties. There are few opportunities for long distance views due to the site being located within a developed area. In the limited views that are available the site is seen in the context of the existing settlement.

In close proximity to the eastern boundary of the site there is a Grade II Listed building, Manor Farmhouse. The sensitivity of its location requires careful design to ensure that the site makes a positive contribution to the setting of the nearby Listed Building. Standard housing designs are unlikely to achieve this. The design and layout of the scheme must be sympathetic to the historic character of the area.

Submission of details showing how sustainable drainage measures will integrate with the design of the development, and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission

The allocated site is identified in the SADMP (2016) Sustainability Appraisal as the least constrained of all the other options to accommodate growth in the village. It is of a scale to allow flexibility in the layout and respond to the specific characteristics of the locality.

East Winch

Rural Village

Description

The village of East Winch is situated to the east of the Borough on the A47, seven miles east of King's Lynn and eleven miles west of Swaffham. The village consists of three parts; East Winch Hall to the east, development around the junction of the A47 and stretching along Church Lane in a linear pattern; and the largest part of the village is around the junction of the A47 and then follows Gayton Road north and east containing estate development.

The Parish of East Winch has a population of 779 (Census Data 2011). The village benefits from services including a regular bus service, Post Office, pub and local employment.

East Winch is designated a Rural Village. East Winch received an allocation of at least 10 dwellings in the Site Allocation and Development Management Policies 2016 (SADMP).

G33.1 East Winch - Land South of Gayton Road

Site Allocation

Policy G33.1 East Winch - Land south of Gayton Road

Land south of Gayton Road amounting to 0.8 hectares, as identified on the Policies Map, is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

- 275
1. Submission of details relating to the sewer that crosses the site together with mitigation (easement/ diversion) to the satisfaction of Anglian Water;
 2. Provision of affordable housing in line with the current standards.

Site Description and Justification

The allocated site is centrally located in the village, surrounded by existing housing on the north, east and west. The site comprises of Grade 4 (poor quality) agricultural land and other than boundary hedgerows there are no landscape features of note within the site.

The site is well integrated with built development and does not encroach into surrounding countryside in comparison to other considered site options. The site is well screened by existing housing and boundary planting, as such it is considered that development on the site is likely to have minimal impacts on the visual amenity of the area but would be mainly viewed in the context of the existing settlement. Its central position in the village means that is well located to the available local services, providing some opportunity for residents to walk and cycle to these services. The site fronts directly onto Gayton Road. The local Highway Authority indicates that the road network can adequately accommodate the proposed development.

Development on the site would constitute a continuation of housing along Gayton Road, in-filling the gap between existing housing rather than extending the settlement further. In addition, the site is considered favourable by the Council as it lends itself to development that is consistent with the existing form and character of the surrounding area. The allocated site is also supported by the local Parish Council.

Whilst the site is identified as a mineral safeguarded area for silica sand and gravel, this is not considered a constraint as the proposed scale of development is less than 1 hectare. The developer is however encouraged to explore the potential to extract the minerals and utilise them on site in the development.

This site benefits from full planning permission (15/01793/OM, 18/0897/RM, 19/00863/RM, 20/00834/F) for 10 dwellings and development of the site has started.

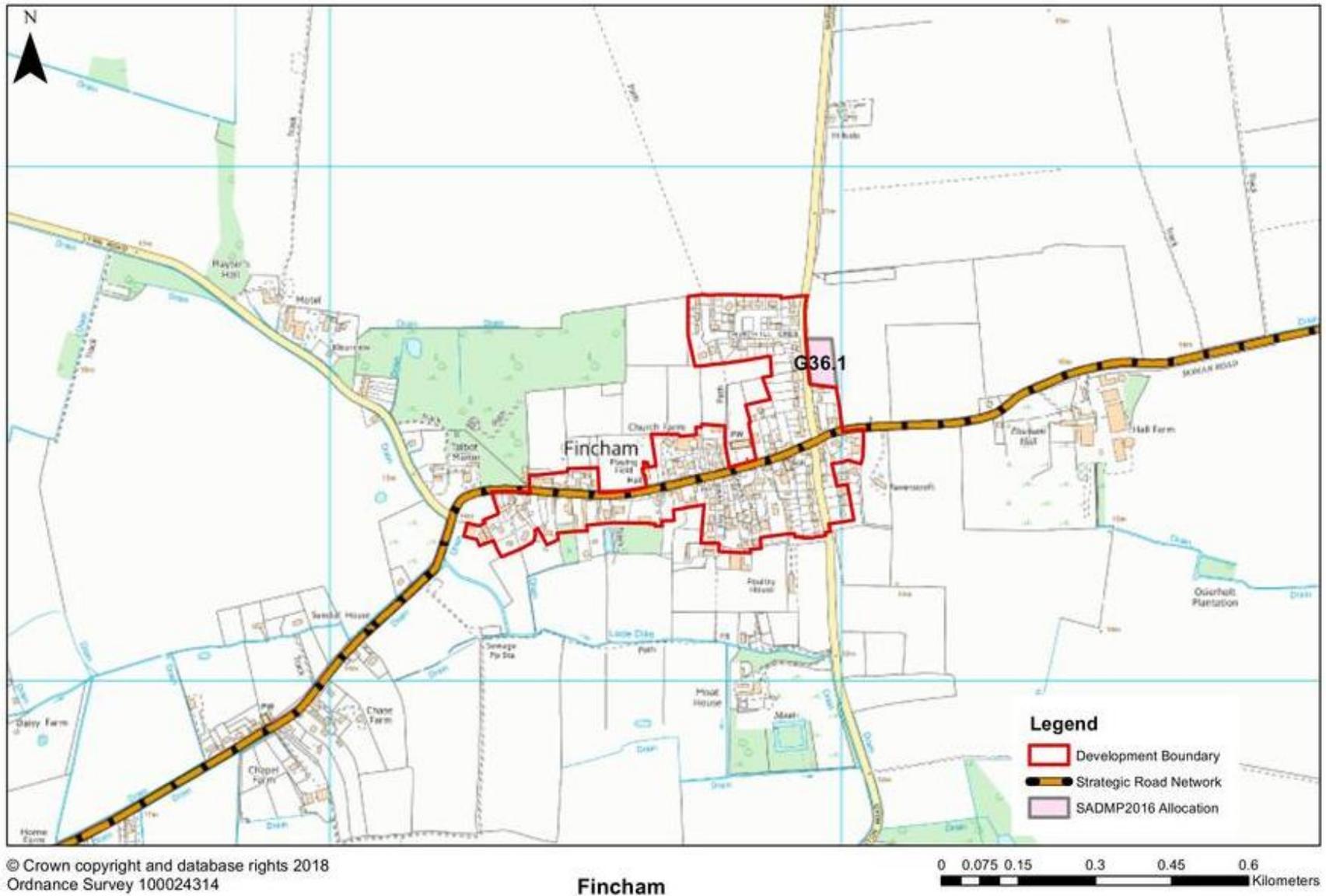
Fincham

Rural Village

Description

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 (Census Data 2011). There are some employment opportunities and few services which include a shop, pub and church in the village.

Fincham is designated a Rural Village. The SADMP (2016) made an allocation of at least 5 dwellings.



G36.1 Fincham - Land East of Marham Road

Site Allocation

Policy G36.1 Fincham - Land east of Marham Road

Land amounting to 0.5 hectares, as shown on the Policies Map, is allocated for residential development of at least 5 dwellings.

Development will be subject to compliance with all of the following:

1. Demonstration of safe highways access that meets the satisfaction of Norfolk County Council as the local highway authority;
2. Submission of an Odour Assessment, to the satisfaction of Anglian Water, in relation to any impacts on residents of the site from the nearby sewage treatment works;
3. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
4. Provision of affordable housing in line with the current standards.

Site Description and Justification

The allocated site is situated towards the north east edge of the settlement. The current proposed development boundary immediately abuts the site's southern and western boundaries. The Council considers the site is capable of providing 5 dwellings at a density appropriate to its location. The Highway Authority has no objection to small scale development on this site.

The site runs parallel to frontage development on the western side of Marham Road, it is considered that development could take place without detriment to the form and character of the settlement by reflecting this linear frontage development. The site would form a natural extension to the settlement and is ideally located, being within walking distance to village services and facilities.

The Conservation Area is a short distance from the site; therefore, any development should protect and enhance the character and appearance of Fincham Conservation Area.

The site is classified as grade 3 agricultural land.

The majority of the views into the site are limited to near distance from adjacent roads and properties. Medium and long-distance views from the wider landscape are possible from the north and there are limited views from the east. However, in these views the site is seen in the context of the existing settlement.

Most of the village is within a cordon sanitaire for a sewage treatment works. This indicates there may be an amenity issue relating to odour for new residents. Any application for development would need to provide an odour assessment to demonstrate this will not be a problem.

The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SUDS) would be sought to serve new development.

The site benefits from full planning permission (19/01756/F) for 5 dwellings.

Flitcham

Rural Village

Description

Flitcham is a small linear settlement which spreads from the Church of St. Mary towards Flitcham Abbey and is situated seven miles northeast of King's Lynn. Flitcham is low in overall service provision but the village does support a small school. The main access road from Flitcham is the B1153 but the village is not served by public transport links. Flitcham with Appleton parish has a population of 276 (Census Data 2011).

The SADMP (2016) suggested that Flitcham would receive an allocation for new houses. However, no sites were identified which were acceptable in terms of heritage, landscape and highways issues. **Therefore, no sites were allocated in Flitcham, and the Local Plan review retains this position.**

Great Bircham/Bircham Tofts

Rural Village

Description

Great Bircham and Bircham Tofts comprise three original settlements along the B1153 and B1155: buildings clustered around Lower and Pond Farms to the east, buildings around the Church in the middle, and buildings around Church Farm and Town Farm and the inn to the south. Subsequent small-scale developments during the 1930s, 1980s and 1990s has led to the villages present form. Since then, new dwellings have mostly been by the “conversion” of, or building in traditional styles in the vicinity of, former farm barns and outbuildings.

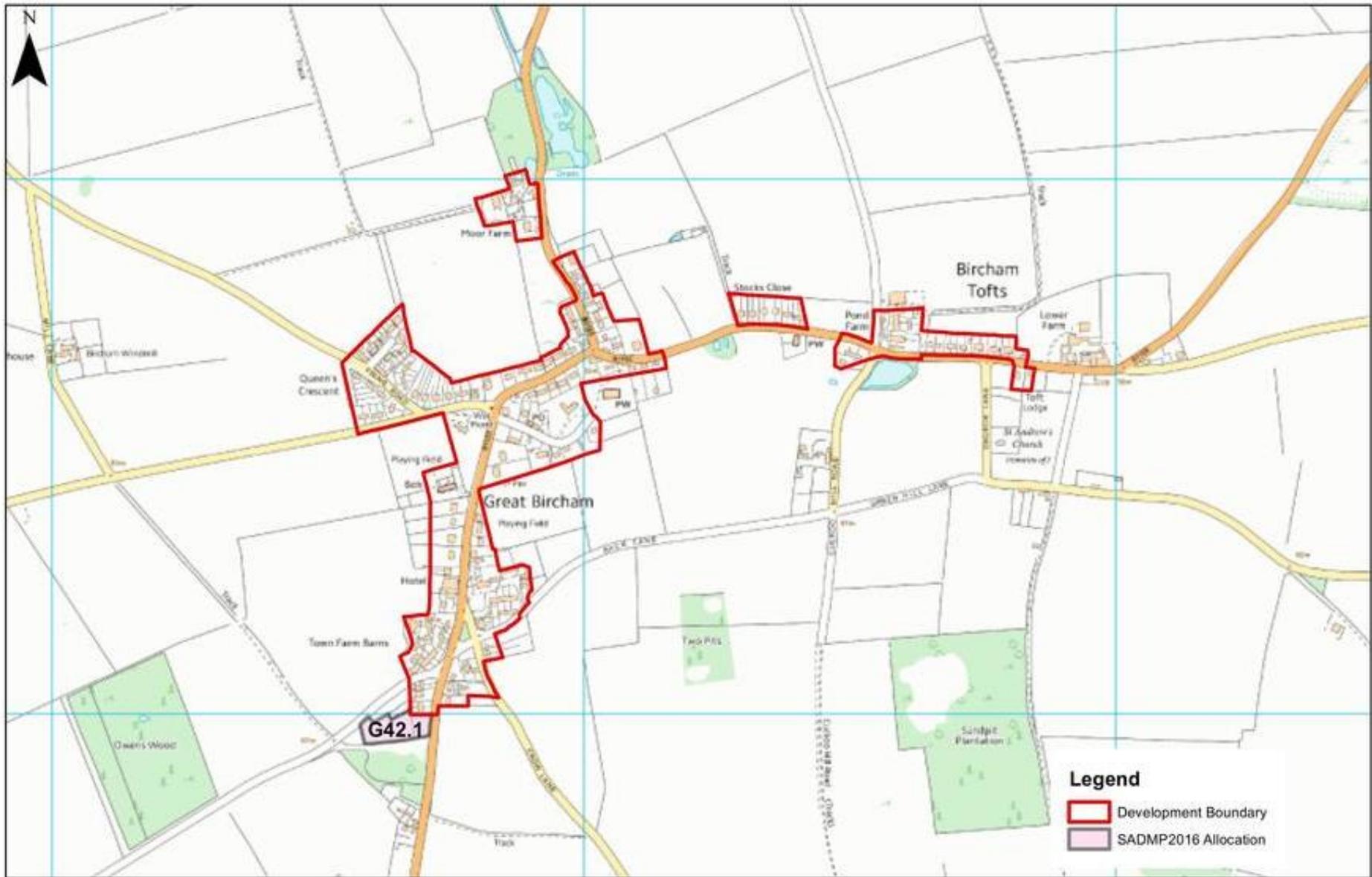
Great Bircham and Bircham Tofts have some key services such as a school, a convenience shop, an inn/pub, a licensed social and sports club, and a church; but it has no regular public transport service and the Post Office has recently closed. Bircham Parish has a population of 448 (Census Data 2011).

Great Bircham and Bircham Tofts has a combined population size and level of services fairly typical for a designated Rural Village. These settlements are rural in character and are fairly distant from King’s Lynn and other large towns.

In considering the appropriate level of development in each settlement, through the SADMP (2016) Great Bircham and Bircham Tofts would have received a modest housing allocation.

However, in response to Bircham Parish Council’s request for a greater level of new housing, and in order to optimise the use of land on the site, the Borough Council did make an allocation of at least ten new homes. This position is carried forward within the Local Plan review.

For detail regarding the former National Construction College (East) and headquarters of Construction Skills (Construction Industry Training Board) close by please see Policy LP09.



Page Break

G42.1 Great Bircham and Bircham Tofts - Land Adjacent to 16 Lynn Road

Site Allocation

Policy G42.1 Great Bircham and Bircham Tofts - Land adjacent to 16 Lynn Road

Land amounting to 0.58 hectares, as shown on the Policies Map is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with and all of the following:

1. Provision of safe access onto Lynn Road;
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
3. Implementation of mitigation measures identified in the Ecological Appraisal undertaken by Wild Frontier Ecology (April 2012);
4. Provision of affordable housing in line with the current standards.

Site Description and Justification

The allocated site is relatively free of constraints. The site is not within the cordon sanitaire relating to odour issues, it has received no objection from the Highways Authority and development would not compromise the landscape separation between Great Bircham and Bircham Tofts.

In comparison to alternative options, the majority of views of the site are limited to the near distance from adjacent properties; however, there are wider views when entering the village from the south. New development will be partially screened by existing

vegetation and hedgerows to the south of the site which will help to reduce the visual impact on the wider countryside. The Council considers that development on this site would have the lowest visual impact on the wider countryside in comparison to other alternative site options.

The site lies to the south of the village, largely adjacent to the proposed settlement boundary with a small portion of the site to the north within it. The site is currently heavily vegetated, with a number of mature trees and hedgerows within the site itself as well as on the boundaries. An Ecological Appraisal has been undertaken by the developer which has identified mitigation strategies to minimise the impact of development on local species and native habitats. The policy wording requires the developer to implement the identified mitigation strategies.

It is considered that the site is of a sufficient scale to accommodate the 10 dwellings sought in the village at a density consistent with the surrounding area and without detriment to the form and character of the locality.

This site benefits from outline planning permission (16/00888/O) for 10 dwellings.

Harpley

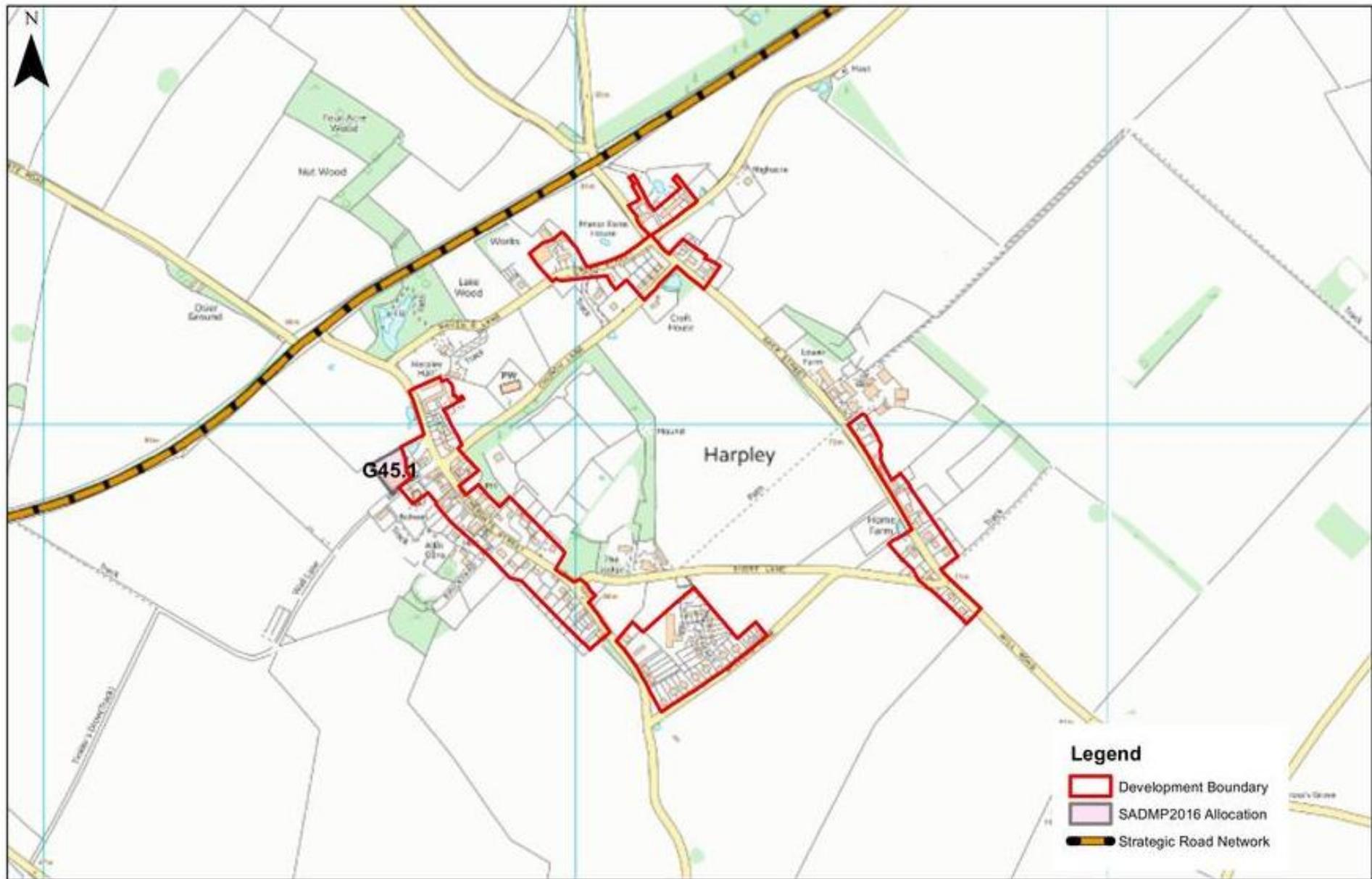
Rural Village

Description

Harpley is a small rural village consisting of three distinct parts, two of which are grouped around farms. The settlement pattern is generally linear, and development is surrounded by mature trees and the wider countryside. The parish of Harpley has a population of 338 (Census Data 2011). The level of services has declined in recent years but still has a village hall, primary school, church and pub. Harpley is in a relatively elevated position in comparison to most rural villages within the Borough, which affords good views.

Harpley is adjacent to the A148, a well-used road link between the larger settlements of King's Lynn and Fakenham. The village is served by a bus stop although services are infrequent.

Harpley is one of the smaller designated Rural Villages in population size and is very rural in nature. Therefore, the Council sought limited growth to support essential services. The SADMP (2016) did make an allocation of at least five houses, and this is carried forward within the Local Plan review.



G45.1 Harpley - Land at Nethergate Street/School Lane

Site Allocation

Policy G45.1 Harpley - Land at Nethergate Street/School Lane

Land amounting to 0.35 hectare, as shown on the Policies Map, is allocated for residential development of at least 5 dwellings.

Development is subject to compliance with all of the following:

1. Suitable provision / improvements to pedestrian links to Nethergate Street;
2. Retention of the existing pond adjacent to the access point at the north east corner of the site and retention of the hedgerow which bound the site;
3. Submission of an Archaeological Field Evaluation based on the potential for findings in relation to medieval findings which should be used to inform the planning application;
4. Provision of affordable housing in line with the current standards.

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Site Description and Justification

The allocated site is ideally located close to the school and offers a number of options for development. Whilst a grain store occupies the site, evidence has satisfied the Borough Council that it cannot be used for this purpose due to its proximity to the school and the amenity issues when using the dryer. It is considered that an appropriate scheme of development could result in an improvement on the visual amenity of the site that is currently dominated by the grain store.

The site lies to the west of the settlement just north of the village school. The area currently comprises a non-operational grain store, a small area of uncultivated arable land (grade 3), a redundant barn, a pond, and an access onto Nethergate Street. A

mature and established hedgerow bounds the site to the south. Other than the pond and hedgerow there are no other landscape features of importance within the site boundary.

Views of the site consist of medium distance views from the A148 to the north of the site and near distance views from adjacent roads, properties and public rights of way. Medium and long-distance views from the wider landscape are possible from across the valley to the south and south east.

The Historic Environment Service have indicated that the site is within a deserted section of Harpley. They recommend any development in this location be informed by an archaeological field evaluation by trial trenching, and that any development takes into account the result of the field evaluation. A large undeveloped area adjacent to the north and west boundaries of the site have been found to contain earthworks of a former medieval settlement within parkland belonging to Harpley Hall. Norfolk Wildlife Trust have indicated the applicant should seek retention of or mitigate against the loss of hedge and pond. The Council seek to retain these features on the site.

The site benefits from full planning permission (19/00301/F) for 6 dwellings.

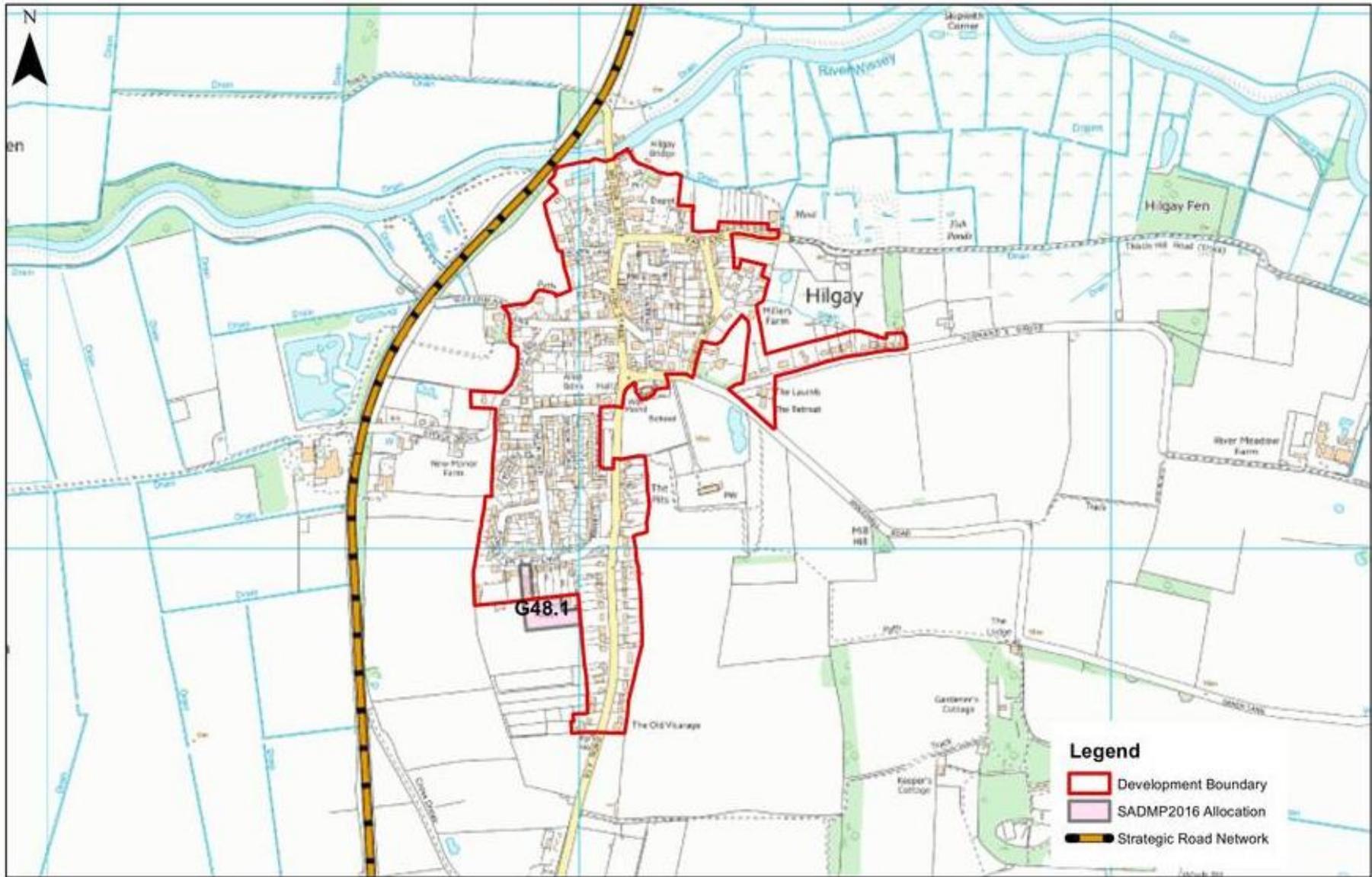
Hilgay

Rural Village

Description

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 (Census Data 2011).

Hilgay is designated as a Rural Village. The SADMP (2016) made an allocation for at least 12 dwellings in Hilgay, and the Local Plan review carries this forward.



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Hilgay

0 0.075 0.15 0.3 0.45 0.6
Kilometers

G48.1 Hilgay - Land South of Foresters Avenue

Policy G48.1 Hilgay - Land south of Foresters Avenue

Land amounting to 0.6 hectares, as identified on the Policies Map, is allocated for residential development of at least 12 dwellings.

Development will be subject to compliance with the following:

1. Submission of details showing how the water main and sewer crossing the site can be accommodated within the development (including any easements/diversions) to the satisfaction of Anglian Water;
2. Improvements to the footway network and safe access to the site from Foresters Avenue to the satisfaction of the local highway authority;
3. Prior submission of a desk based Archaeological Assessment of the site and proposed developed;
4. Provision of affordable housing in line with the current standards.

Site Allocation

Site Description and Justification

The allocated site is situated towards the south west of the settlement, south of Forester's Avenue. The development boundary immediately abuts the northern and eastern site boundaries. The site is located close to a bus stop and within a relatively short

distance of the local school. The Council considers the site capable of accommodating the 12 residential units required in the settlement at a density reflecting that of the surrounding area. Development on this site is supported by Hilgay Parish Council.

The site is currently agricultural land (grade 3) and there is a water tower located towards the north east corner of the site. There are no important landscape features on the site (e.g. hedgerows or trees) and development would be well screened in the context of the existing settlement.

Norfolk County Council as the local highway authority have no objection to this site been developed providing local improvements to the footway network are made. Access would be achieved from Forester's Avenue.

The Historic Environment Service have identified the site as an area of archaeological interest and therefore the allocation policy requires a desk based archaeological assessment prior to development.

The following constraints must be resolved prior to development, a sewer and water mains cross the site and therefore easement/diversion may be required in consultation with Anglian Water.

The site benefits from outline planning permission (16/00718/OM) for 17 dwellings, and a reserved matters application has been submitted for consideration (20/00119/RM).

Hillington

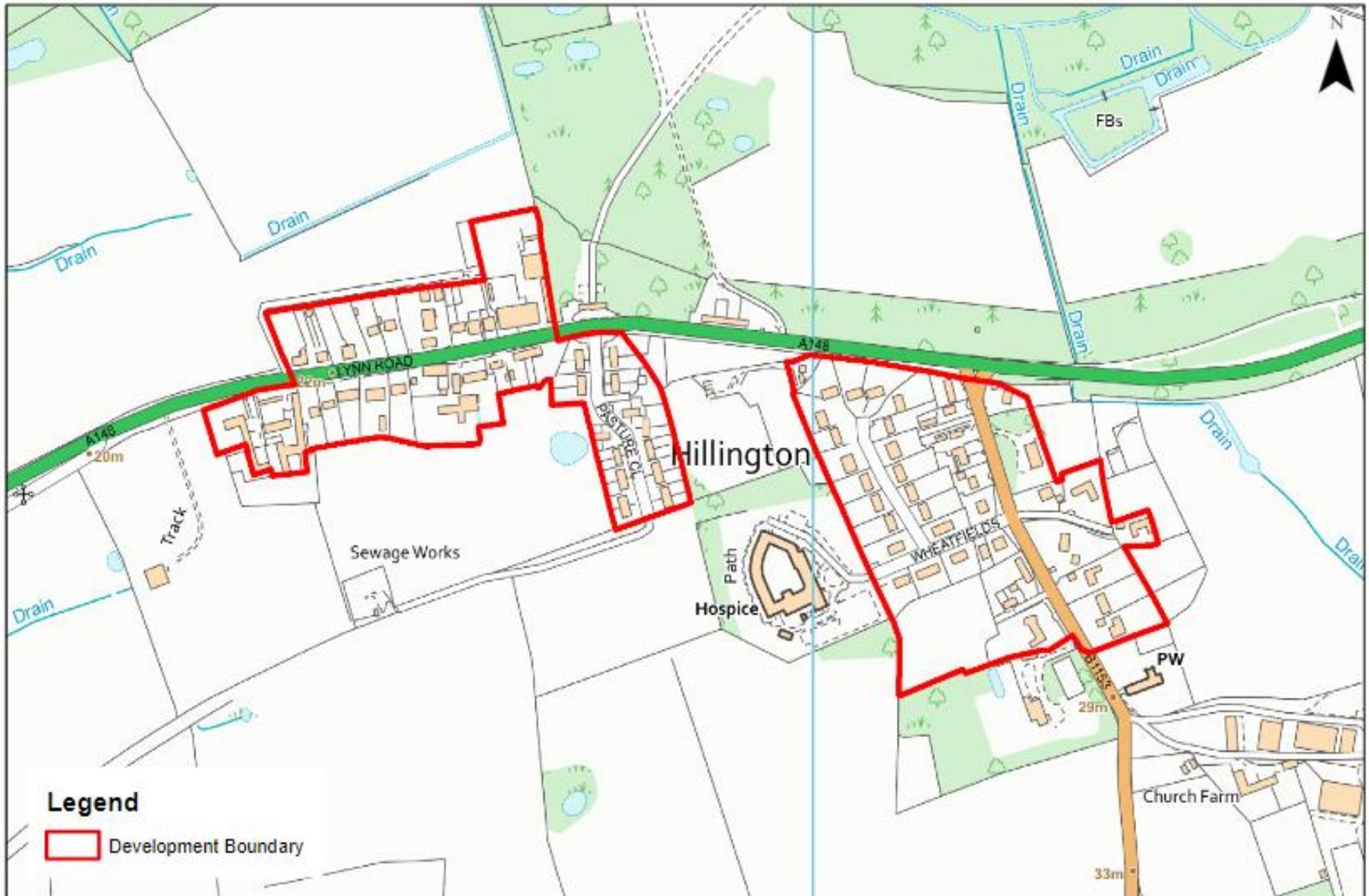
Rural Village

Description

Hillington is essentially a linear village straddling the A148 King's Lynn to Cromer road. Aside from this road, the village is very rural in character and is centred around the historic entrance to Hillington Hall, on the edge of the Sandringham Estate. Development also stretches along the B1153 near to St. Mary's Church. Hillington has a shop/service station, bus services, The Ffolkes public house which has recently been re-developed and now provides accommodation, banqueting facilities as well as being a pub and restaurant, and is also home to The Norfolk Hospice, which is located off Wheatfields, this is a significant Borough/County-wide resource for both in and out patients. The Hospice generates traffic to and from the site on a daily basis from clients, volunteers, employees and fund-raising events.

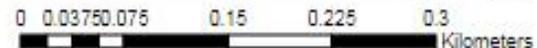
The level of services generally relates to the position of the settlement on the A148, as the parish has a population of only 400 (Census Data 2011) making it one of the smaller rural villages. It lies seven miles north east of King's Lynn.

Hillington is designated as a Rural Village. The SADMP (2016) did make an allocation for at least 5 dwellings. However, since adoption the SADMP the landowner has expressed a desire not to develop the site and therefore it has been removed from the Local Plan review.



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Hillington



Ingoldisthorpe

Rural Village

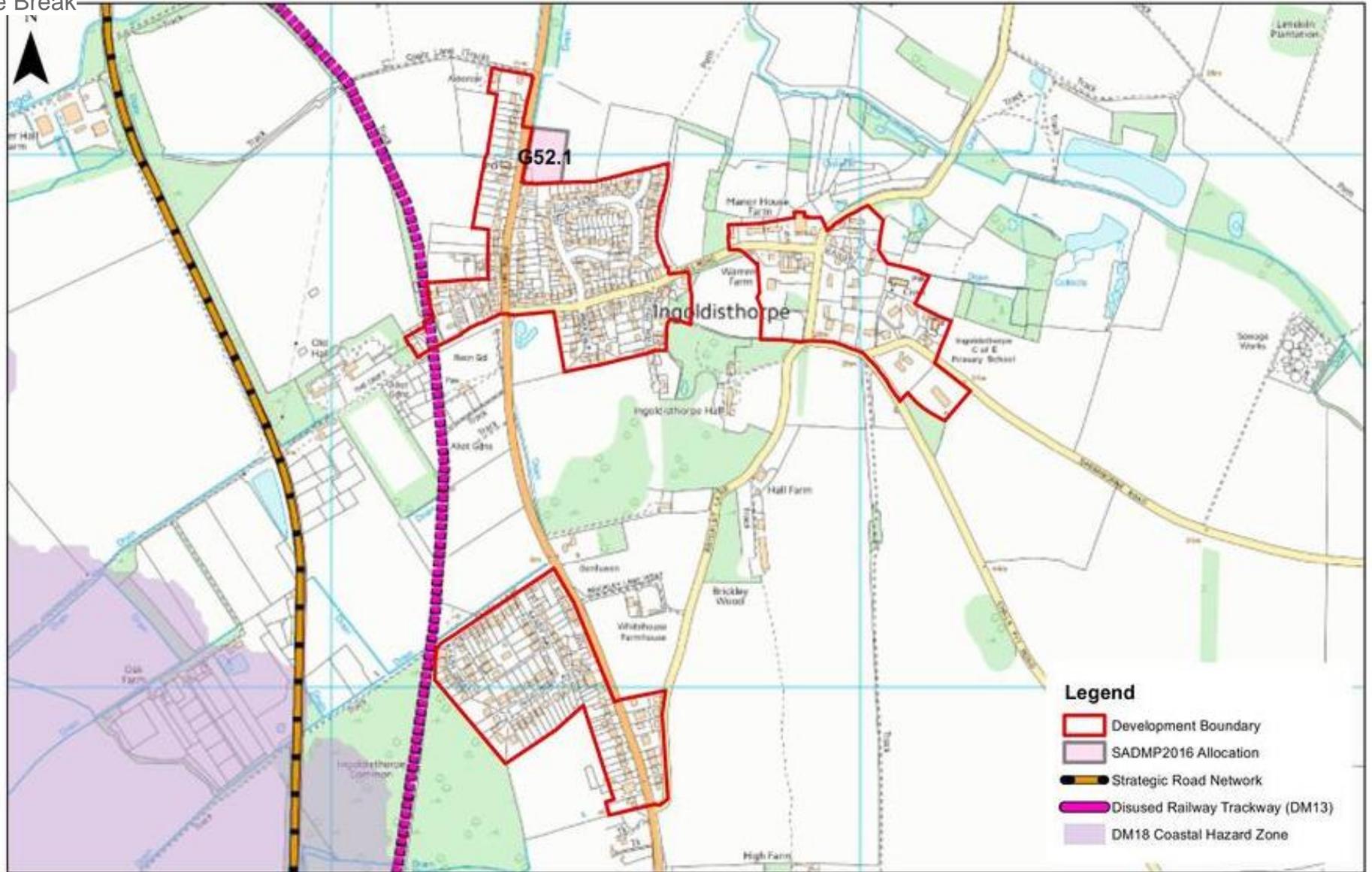
Description

Ingoldisthorpe Parish has a population of 849 (Census Data 2011). The central part of the village contains a convenience store and school. The village is served by good public transport links and is well connected to King's Lynn, Hunstanton and the nearby larger villages of Heacham and Dersingham via the Lynn Road (B1440). Ingoldisthorpe village currently consists of three distinct parts, the largest being focused around the junction of Hill Road with Lynn Road.

Ingoldisthorpe has a medium population in comparison to other settlements designated as Rural Villages but has a limited range of facilities in the village itself. However, the village lies between the Key Rural Service Centres of Dersingham and Snettisham, meaning residents can access a greater range of services in these settlements, which are at a distance of around one mile. The SADMP (2016) accordingly made an allocation of at least 10 dwellings.

Ingoldisthorpe Neighbourhood Plan

The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Ingoldisthorpe Parish Council are in the process of preparing a Neighbourhood Plan for their Area. The Ingoldisthorpe Neighbourhood Plan Area was formally designated by the Borough Council in February 2020.



- Legend**
- Development Boundary
 - SADMP2016 Allocation
 - Strategic Road Network
 - Disused Railway Trackway (DM13)
 - DM18 Coastal Hazard Zone

G52.1 Ingoldisthorpe - Land opposite 143 - 161 Lynn Road

Site Allocation

Policy G52.1 Ingoldisthorpe - Land opposite 143-161 Lynn Road

Land amounting to 0.7 hectare, as shown on the Policies Map, is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

1. Provision of a new footway which would join the site with the village services and the existing footway on Lynn Road;
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
3. Provision of affordable housing in line with current standards.

Site
Description
and
Justification

The
allo

cated site lies to the north of the village adjacent the proposed development boundary on its south and west sides. The site is situated in a fairly built up part of the settlement with the surrounding area consisting of road frontage residential developments to the west and south, and undeveloped agricultural land on the remaining two sides to the north and east.

The site itself is currently flat, undeveloped agricultural land (grade 3), bordered by trees and hedgerows on all sides. Whilst development would result in the loss of undeveloped land, the limited land required for the development of ten houses would enable the remainder of the field to continue to be used for arable farming.

Views of the site from the existing properties and the rest of the village are fairly near distance, as it is largely screened by the vegetation surrounding the site. Wider views exist when entering the village from the north, however the site is again hidden somewhat by trees and hedgerows.

The site presents the opportunity to develop 10 dwellings fronting onto the B1440 road, mirroring existing housing on the opposite (western) side of the road. The site is well located to some local amenities; it is directly opposite the village hairdressers, and a local bus stop which goes in-between Hunstanton and King's Lynn. Norfolk County Council, as the local highway authority, have expressed concern about pedestrian access to the school from the proposed site. To address this issue, the Council would require a new footway from the proposed site to be joined up with the village services and the existing footway on Lynn Road.

The Borough Council considers that development on the site would have limited negative impact on form, character, visual amenity and accessibility.

The site has come forward and benefits from outline planning permission (15/02135/OM). This details 15 dwellings. Subsequently a reserved matters application has been granted and work has commenced on site (17/00088/RMM).

Old Hunstanton

Rural Village

Description

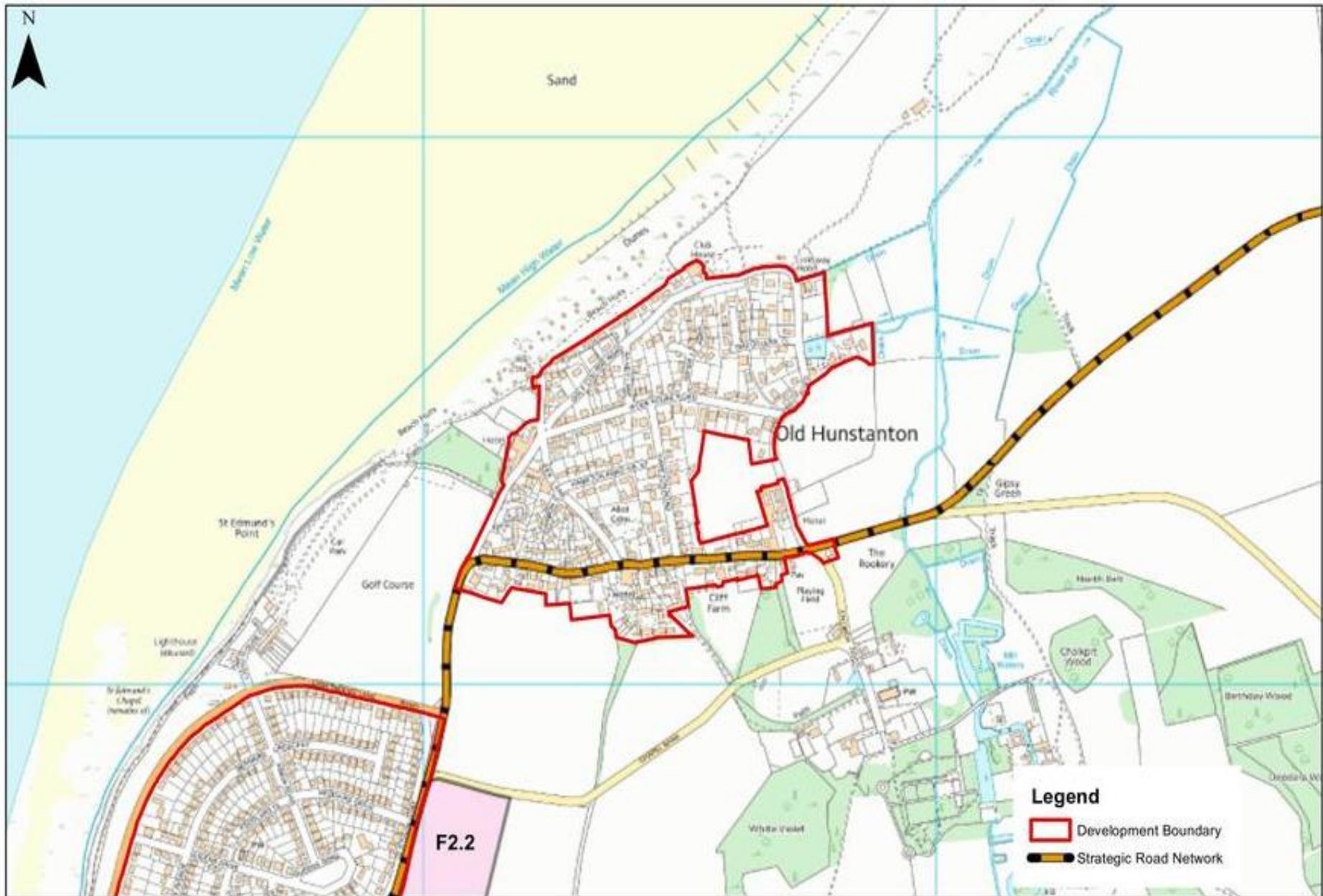
Old Hunstanton is a small coastal village located just to the north of the seaside resort of Hunstanton. It lies adjacent to the Norfolk Coast Area of Outstanding Natural Beauty. (A small part of the eastern end of the development boundary lies within it). The village has a tranquil setting and contains mainly residential development. The village can become very busy in the summer with day trippers and weekenders due to its location with good access to the beach and the Norfolk Coast Path. The village features some traditional beach huts, hotels, the RNLI lifeboat station and is close to the Hunstanton Golf Course.

Old Hunstanton has no school but contains a broader range of facilities and is close to the larger service resort centre of Hunstanton. The village is connected to other coastal villages via the bus route along the A149 which interchanges in Hunstanton and Wells-next-the-Sea. Old Hunstanton parish has a population of 628 according to the 2011 Census.

Old Hunstanton has an average population size and a slightly lower than average level of services compared to the other settlement's designation as a Rural Village. ~~The SADMP (2016) sought to make an allocation of 6 dwellings, however, no sites were suitable for allocation have been identified in the village.~~

Old Hunstanton Neighbourhood Plan

The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. The Old Hunstanton Neighbourhood Plan Area was formally designated by the Borough Council 25/07/2018 and corresponds with the boundaries of Old Hunstanton Parish. **Currently a draft version of the Neighbourhood Plan is being prepared for consultation.**



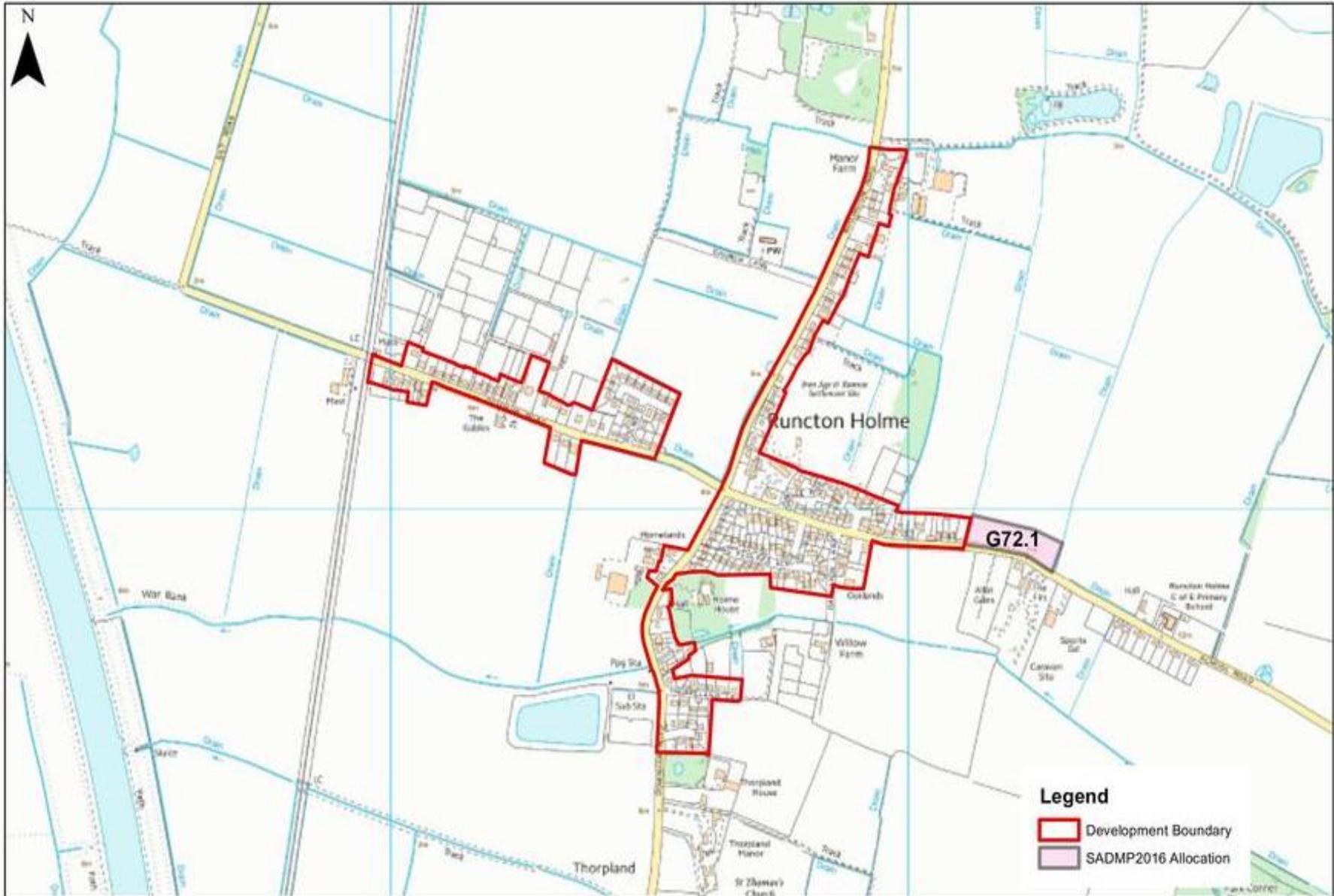
Runcton Holme

Rural Village

Description

Runcton Holme is situated approximately nine miles south of King's Lynn, four miles north of Downham Market, and to the west of the A10. The village has developed around the crossroads between the Watlington to Downham Market Road, School Road and Common Road. The village is basically linear in form and has a rural setting and a good relationship with the surrounding open countryside. This rural character is strengthened by hedgerows and garden planting.

The Parish of Runcton Holme has a population of 657 (Census Data 2011). The village has very few services and limited employment uses. Runcton Holme is designated as a Rural Village. The SADMP (2016) made an allocation for at least 10 dwellings. The Local Plan review seeks to take this forward.



G72.1 Runcton Holme - Land at School Road

Site Allocation

Policy G72.1 Runcton Holme - Land at School Road

Land at School Road amounting to 0.9 hectares, as identified on the Policies Map, is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

1. Provision of safe and appropriate access with good visibility, and improvements to the local footpath network, to the satisfaction of the local highway authority;
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
3. Provision of affordable housing in line with the current standards.

Site Description and Justification

The site is situated to the eastern edge of the settlement. The development boundary immediately abuts the site's western boundary. The Council considers that the site is capable of accommodating 10 residential units in the settlement at a density which reflects that of the surrounding area.

Scoring highly in terms of sustainability, the site is located close to the local primary school and adjacent to detached dwellings. New housing would form an extension of this residential linear frontage style development along School Road towards the east of the settlement.

The site is high quality agricultural land (Grade 2) and bounded to the west by hedgerows, however the Council considers due to modest amount of land required for development and proximity to services it is appropriate to develop on this agricultural land.

The majority of the views into the site are limited to near distance from School Road and adjacent properties. There are few opportunities for long distance views due to the site being located within a developed area. The site is completely screened by housing on the west boundary. In the limited views that are available the site is seen in the context of the existing settlement.

Access to the site is gained via School Road, which is supported by the local highway authority provided that safe and deliverable access can be achieved, and improvements are made to the local footpath network. The number of driveways directly linked to School Road should be limited through either the use of shared driveways as seen with existing development along School Road, or an access road.

The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SuDS) would be required to serve new development.

This site is considered favourably by the Borough Council as the allocation for housing in Runcton Holme due to its proximity to the school and as it is considered to have a less negative impact on the landscape in comparison to the potential alternatives.

This site benefits from full planning permission (16/01186/OM & 19/01491/RMM) for 10 dwellings.

Sedgeford

Rural Village

Description

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 (Census Data 2011) 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.

Sedgeford has an average population size and a slightly lower than average level of services for its designation as a Rural Village. The settlement is very rural in character and is in a very picturesque location within the Area of Outstanding Natural Beauty. Its undulating nature means there are many viewpoints within and towards the village, therefore a key consideration in locating development is minimising the visual impact on the surrounding countryside and preserving the rural character of the village.

The SADMP (2016) did make a housing allocation for at least 10 dwellings.

Sedgeford Neighbourhood Plan

The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area.

The Sedgeford Neighbourhood Plan was formally made and came into force September 2019 and can be viewed in full via the link below. The Sedgeford Neighbourhood Plan sits alongside the Local Plan and forms part of the Local Development Plan. Its policies will be used to guide development and assist in the determination of planning applications within the Area. It also provides additional housing allocations, as well as altering the SADMP allocation.

- https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans/117/completed_plans

G78.1 Sedgeford - Land off Jarvie Close

Site Allocation

Policy G78.1 Sedgeford - Land off Jarvie Close

Land amounting to 0.6 hectare, as shown on the Policies Map, is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance all of the following:

1. Suitable provision / improvements to pedestrian links from the site to Jarvie Close;
2. Delivery of a safe access that meets the satisfaction of the local highway authority;
- 309 3. The design of development, and in particular its massing and materials, shall have regard to its potential impact on the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty;
4. Incorporation of a high-quality landscaping scheme including the retention and enhancement of established hedgerow on the western boundary of the site to minimise the impact of the development on the wider countryside;
5. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
6. Submission of details showing how the water mains crossing can be accommodated within the development (including any easements/diversions) to the satisfaction of Anglian Water;
7. Provision of affordable housing in line with current standards.

In addition to this Local Plan Policy the Sedgeford Neighbourhood Plan which was made after the SADMP contains the following policy for the site, it also contains some supporting text, and this can be viewed via the link provided earlier.

Policy H1: Development of site allocated at Jarvie Close

Policy H1: Development of site allocated at Jarvie Close

The development of the site allocated under Policy G78.1 of the Site Allocations and Development Management Policies DPD will be supported where it would meet the following criteria:

- a) The development shall be for a minimum of 11 dwellings or 1000sq m;
- b) The development respects the density, form and layout of houses in the immediate locality
- c) The layout of the development will provide for the maintenance of access from Jarvie Close to the footpath that runs along the western boundary of the site;
- d) The rooflines and spacing of the development should be designed to minimise the obstruction of views across the river valley from public places on Jarvie Close and should not appear higher than those in the existing Jarvie Close development in views across the valley from the south.

310

Site Description and Justification

The site lies in a relatively central location in the village, with existing housing on three sides. The site currently comprises uncultivated Grade 3 agricultural land. There are no available opportunities to utilise previously developed land for new housing in Sedgford. In this context, the site provides the opportunity to develop land which has no identified use.

The area in the immediate vicinity slopes in a north south direction with the site sitting in a central position between Jarvie Close (on higher ground to the north) and Mill View (on lower ground to the south). The natural topography of the site, being on a slope with development on both higher and lower ground, would lessen the impact of development on the surrounding area, limiting the impact on the local visual amenity and the scenic beauty of the Area of Outstanding Natural Beauty and other countryside. Long views are afforded of the site from the west, but any development would be read in the context of the existing village and not be of detriment to the character of the settlement. The policy includes a clause to give emphasis to the importance of addressing landscape impacts in the design of the proposed housing.

Apart from the hedgerows on the western boundary, there are no important landscape features on the site although the site itself is within the Area of Outstanding Natural Beauty. The Conservation Area sits a good distance from the site (approximately 100 metres to the south). Due to the distances involved and the built form in the immediate vicinity of the site, it is not considered that development of the site would be of detriment to the character and appearance of Sedgeford's Conservation Area. There are no Listed Buildings in the vicinity of the site.

A development of six dwellings on the site would either result in a very low-density development or create left over space which would likely come forward for housing in the near future. By allocating ten dwellings on the site the Council can increase the level of affordable housing to two dwellings and ensure the site is development comprehensively, with a design and layout that fits in with the surrounding area.

Norfolk County Council as the local highway authority consider the site well located and appropriate for development subject to the delivery of safe access. They have also expressed preference for minor development of this site over the alternative development option. Sedgeford Parish Council and the Norfolk Coast (AONB) Partnership have both expressed a preference for minor development of this site due to the lesser visual impact on the landscape and Area of Outstanding Natural Beauty. Sedgeford Parish Council have also identified potential ownership constraints in accessing the alternative site and would strongly resist development of that site.

The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SUDS) would be sought to serve new development.

One constraint which must be resolved prior to development is that a water main(s) cross the site and therefore easement / diversion may be required in consultation with Anglian Water.

Housing affordability is a key issue for local people within settlements in the Area of Outstanding Natural Beauty. Cumulatively, new allocations will increase choice in the market and enable some new affordable housing to benefit local residents. An allocation of ten houses on the preferred site would enable the delivery of two affordable homes.

The Borough Council is the current landowner, previous planning permission was granted for 9 dwelling on the site (16/01414/O). However, the Borough Council is now seeking to bring forward the land as a Custom and Self-Build site.

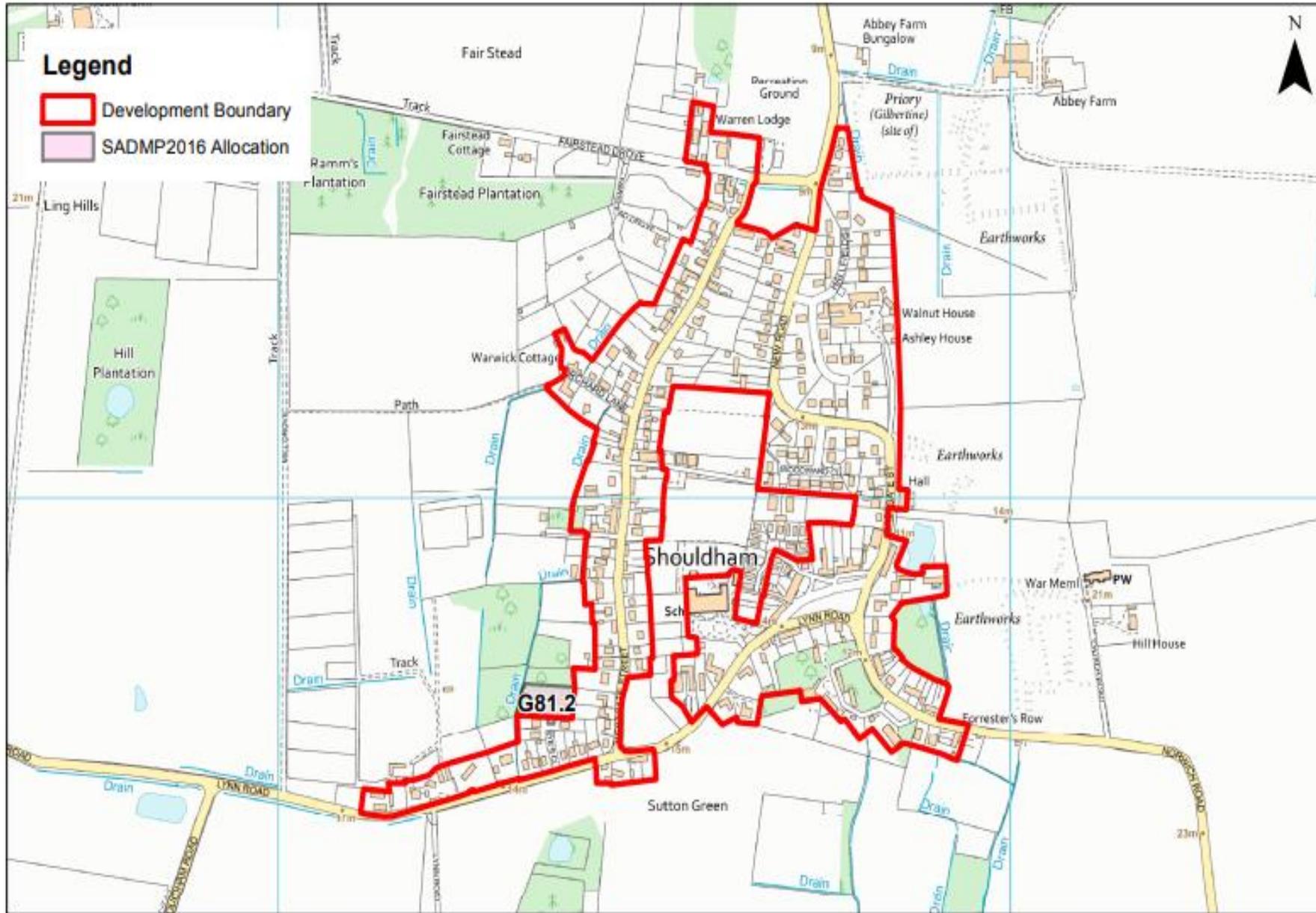
Shouldham

Rural Village

Description

14.16.1 Shouldham is situated approximately ten miles south east of King’s Lynn and approximately six miles north east of Downham Market. The village is based on a circuit form and the high-quality character has been recognised through designation as a Conservation Area towards the south east of the settlement. The village has an adequate range of services including a school, a bus route, shop, Post Office and there are some employment opportunities. The Parish of Shouldham has a population of 605⁽⁵⁶⁾.

14.16.2 Shouldham is designated as a Rural Village and is considered to have an adequate range of services and facilities. The SADMP 2016 did make two allocations providing at least 10 dwellings across the sites. Due to no progress the decision has been made to deallocate policy G81.1 from the local plan review.



14. 16. 2 G8 1.2 Shoul dham - Land ac ce ss ed from Ry e's Cl os e

Site All oc

ation

Policy G81.2 Shouldham - Land accessed from Rye's Close

Land accessed from Rye's Close, amounting to 0.3 hectares, as identified on the Policies Map, is identified for residential development of at least 5 dwellings.

Development will be subject to compliance with all of the following.

1. Submission of details showing how the water mains crossing can be accommodated within the development (including any easements/diversions) to the satisfaction of Anglian Water;
2. Achievement of suitable safe access to the site through Rye's Close to the satisfaction of the local highway's authority;
3. Retain trees according to the conditions of the Tree Preservation Order
4. Provision of affordable housing in line with the current standards.

314

Site Description and Justification

14.16.2.1 The allocated site is situated towards the south west of the settlement. The current development boundary immediately abuts the sites south and east boundary. The Council considers the site is suitable to accommodate 5 residential units at a density reflecting that of the surrounding area.

14.16.2.2 The site is located a short distance from the school and is of a distance from the Conservation Area such that development would not impact to any significant degree on this heritage asset. The site is well screened from the settlement by existing development. The site is bounded by trees which could be incorporated into the design. It is currently used as agricultural land (grade 4), and therefore is not a constraint on development due to its low quality.

14.16.2.3 Norfolk County Council, as local highways authority have advised the only suitable access point is on to Rye's Close.

14.16.2.4 A water main crosses the site and therefore easement/ diversion may be required in consultation with Anglian Water.

14.16.2.5 This site benefits from full planning permission (18/00604/F) for 5 dwellings. Construction is under way with a number of homes having been completed

315

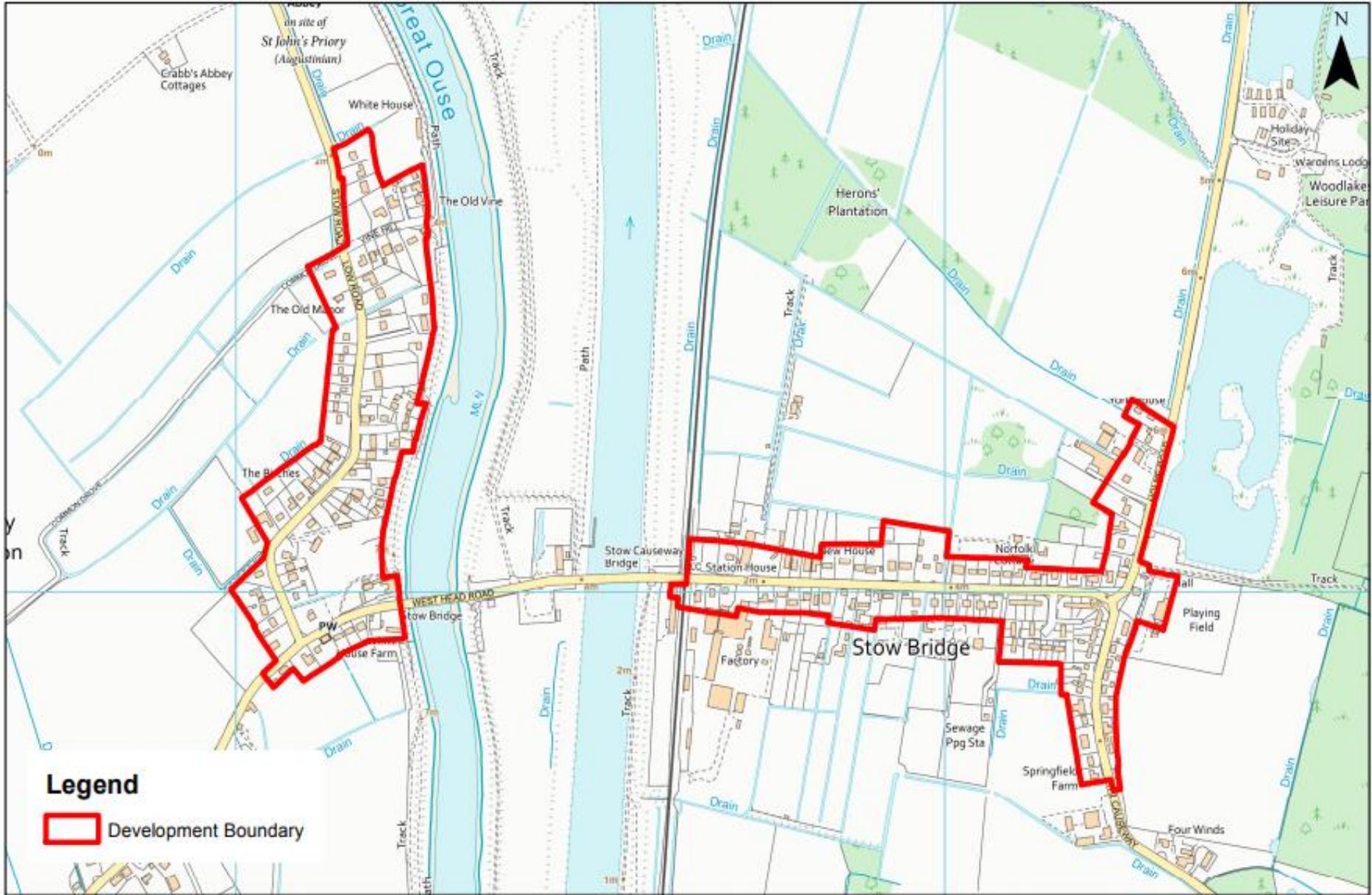
Stow Bridge

Rural Village

Description

14.17.1 Stow Bridge is situated approximately 4 miles north of Downham Market. The village is relatively small and takes a mainly linear form. There are a number of local facilities including the Heron Public House, two farm shops with tea rooms (Bearts of Stow Bridge and Landymore's), a butchers (Sergeants), village hall and the Church of St. Peter.

14.17.2 The settlement is within the Parish of Stow Bardolph, along with the villages of Stow Bardolph and Barroway Drove. The Great Ouse and the Relief Channel run through the village.



14.18 Syderstone

Rural Village

Description

14.18.1 Set on a rising site above an extensive common, Syderstone is a small linear village situated in the north eastern area of the borough. The village contains many traditional character buildings of flint and red brick and contains a landmark feature: the round tower church of St. Mary's. The village contains very few facilities other than a pub. The school is located in nearby Blenheim Park. The settlement is not served by public transport links. Syderstone Parish has a population of 445⁽⁵⁷⁾.

14.18.2 Syderstone Common is a Norfolk Wildlife Trust nature reserve and designated as an SSSI (Site of Special Scientific Interest). Syderstone has an average population size and is very limited in services in comparison to other settlements designated as Rural Villages. The village is about 7 miles west of the town of Fakenham (in bordering North Norfolk District) which provides a good range of services and facilities. The SADMP 2016 did make an allocation of at least 5 dwellings.



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Policy G91.1 Syderstone - Land west of no. 26 The Street

Land amounting to 0.3 hectares, as shown on the Policies Map, is allocated for residential development of at least 5 dwellings.

Development will be subject to compliance with all of the following:

1. Provision of safe vehicular and pedestrian access onto The Street, to the satisfaction of the local highway authority;
2. Incorporation of a high-quality landscaping scheme to the north and western boundaries of the site in order to minimise the impact of development on the wide countryside;
3. Evidence demonstrating a safe and deliverable access and improvements being made to the footway network, to the satisfaction of the local highway authority;
4. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
5. Provision of affordable housing in line with current standards.

320

Site Description and Justification

14.18.1.1 The site is of a size that could accommodate five dwellings taking full regard of the form, character and density of development in the locality of the site. The site is situated on the western edge of village and is within walking distance to central village services.

14.18.1.2 The site is classed as agricultural grade 3 and therefore any development would result in a loss of productive agricultural land. However, only a small amount of land would be required due to the nominal amount of housing sought.

14.18.1.3 Norfolk County Council as local highway authority have no objections to site subject to evidence demonstrating a safe and deliverable access and improvements being made to the footway network.

14.18.1.4 The site is adjacent to frontage development on the northern side of The Street and opposite to development along the southern side of Docking Road, it is considered that development could take place without detriment to the form and character of the settlement by reflecting the existing frontage development.

14.18.1.5 The site is screened by existing development to the south and east meaning that short distance views into the site are afforded from the local highway and these properties, these would be read in the context of development of the adjacent and opposite local built up environment. There are some opportunities for medium and long-distance views from the wider countryside to the north and west of the site, however the policy contains a clause for the Incorporation of a high-quality landscaping scheme in order to minimise the impact of development on the countryside.

14.18.1.6 The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SUDS) would be sought to serve new development.

14.18.1.7 The Council considers the site to offer the best combination of advantages in the settlement as it would form a natural extension to the western edge of the village and is favoured by Syderstone Parish Council.

14.18.1.8 The site benefits from full planning permission for 5 new homes (18/01917/F)

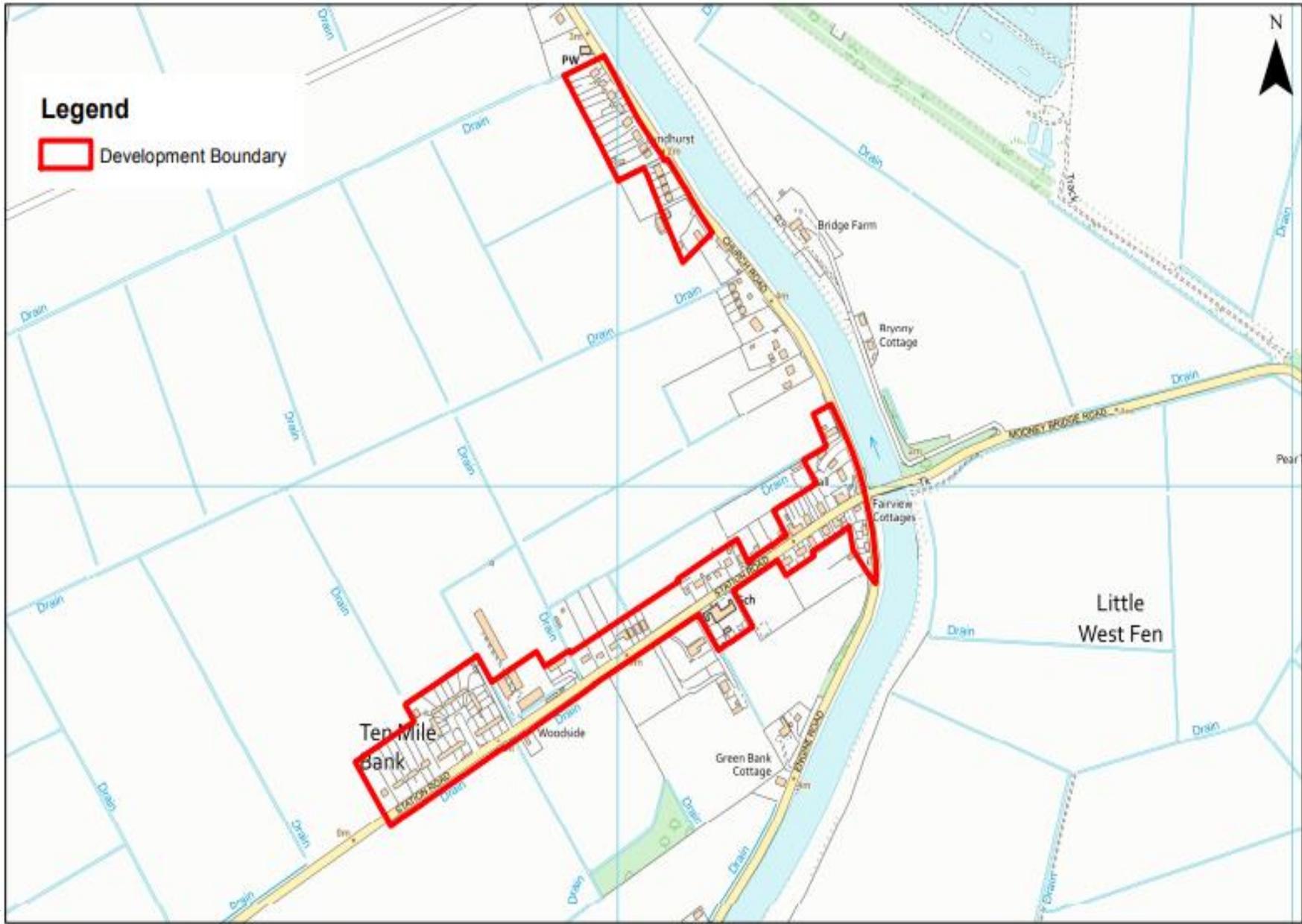
14.19 Ten Mile Bank

Rural Village

Description

14.19.1 Ten Mile Bank is located approximately five miles south of Downham Market and eighteen miles south of King's Lynn. It is situated on the west bank of the River Great Ouse between Denver and Littleport and has the only road crossing of the river between these two points. The river road between Denver and Littleport runs parallel to the main A10 London- Cambridge-King's Lynn road on the opposite side of the river. The village is part of Hilgay Parish with a population of 277 ⁽⁵⁸⁾ and contains a school and bus service.

14.19.2 Ten Mile Bank is designated as a Rural Village. A site known as Policy G92.1 Land off Church Road was allocated by the SADMP (2016) and has since come forward for planning permission (15/00222/O and 17/01646/RM) for 3 dwellings and has been completed. Accordingly, the allocation has been removed from the plan and has been included within the development boundary.



14.20 Thornham

Rural Village

Description

14.20.1 Thornham is a linear coastal settlement located approximately four miles from the town of Hunstanton. The village contains a village hall, deli, restaurant, gift and clothing outlet, as well as three pubs. Thornham parish has a population of 496(59). Thornham is linked to other coastal villages via the Coastliner bus route along the A149 between Hunstanton and Wells-next-the-Sea. Thornham attracts tourists due to its accessibility on the main coastal route (A149) and due to its position within Norfolk Coast AONB and directly on the Norfolk Coast Path.

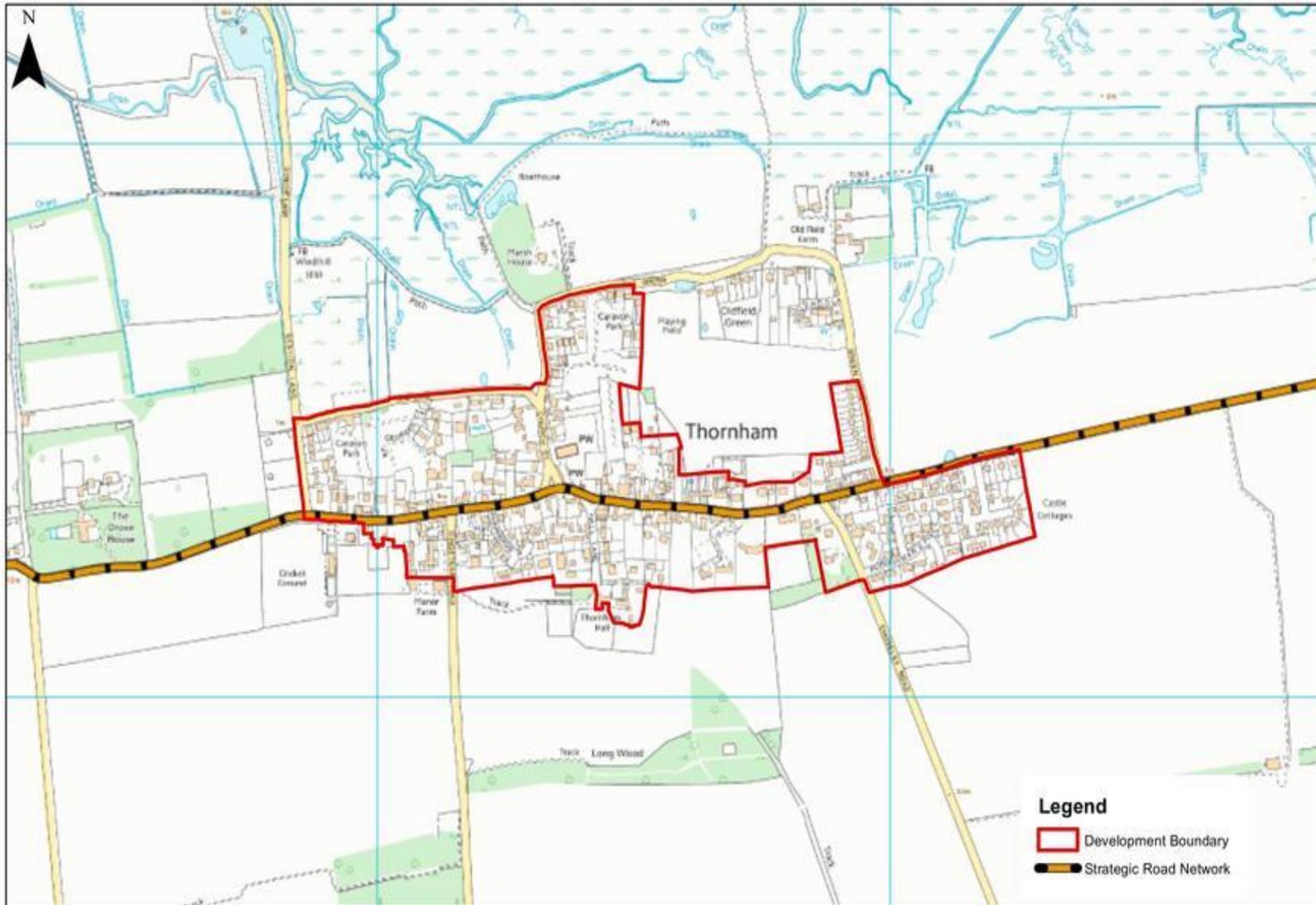
14.20.2 Thornham has an average population size and number of services in comparison to other settlements designated as Rural Villages, although it has no primary school. The settlement is in a sensitive location within the Area of Outstanding Natural Beauty and adjacent to the coastline which has many international designations to protect its environmental, biodiversity and heritage significance. As such, development must be particularly sensitive both in terms of visual impact and the impact new residents could have on the immediate surroundings. Based on the Council's preferred method of distributing new development (as outlined earlier in the plan), Thornham would receive a total allocation of five new houses including one affordable home.

14.20.3 The environmental, heritage and highways constraints limit the potential for development in this village. All sites previously considered received objections from Norfolk County Council (highways authority), Natural England, English Heritage and the Norfolk Coast (AONB) Partnership. Therefore, no allocations for development have been made in Thornham.

Neighbourhood Plan

14.20.4 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Thornham Parish Council is in the process of preparing a Neighbourhood Plan for their Area. The Thornham Neighbourhood Plan Area was formally designated by the Borough Council 17/03/2017 and corresponds with the boundaries of Thornham Parish.

14.20.5 The Parish Council is preparing a Neighbourhood Plan for their area and is currently going through their regulation 16 stage July/September 2020.



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Thornham



14.21 Three Holes

Rural Village

Description

14.21.1 Three Holes is situated to the south of Upwell, where the A1101 bridges the Middle Level Main Drain. The settlement is linear and sprawling in form along the A1101 Main Road and is located eight miles south of Wisbech. The village is part of Upwell Parish and contains a shop, commutable bus route and employment uses.

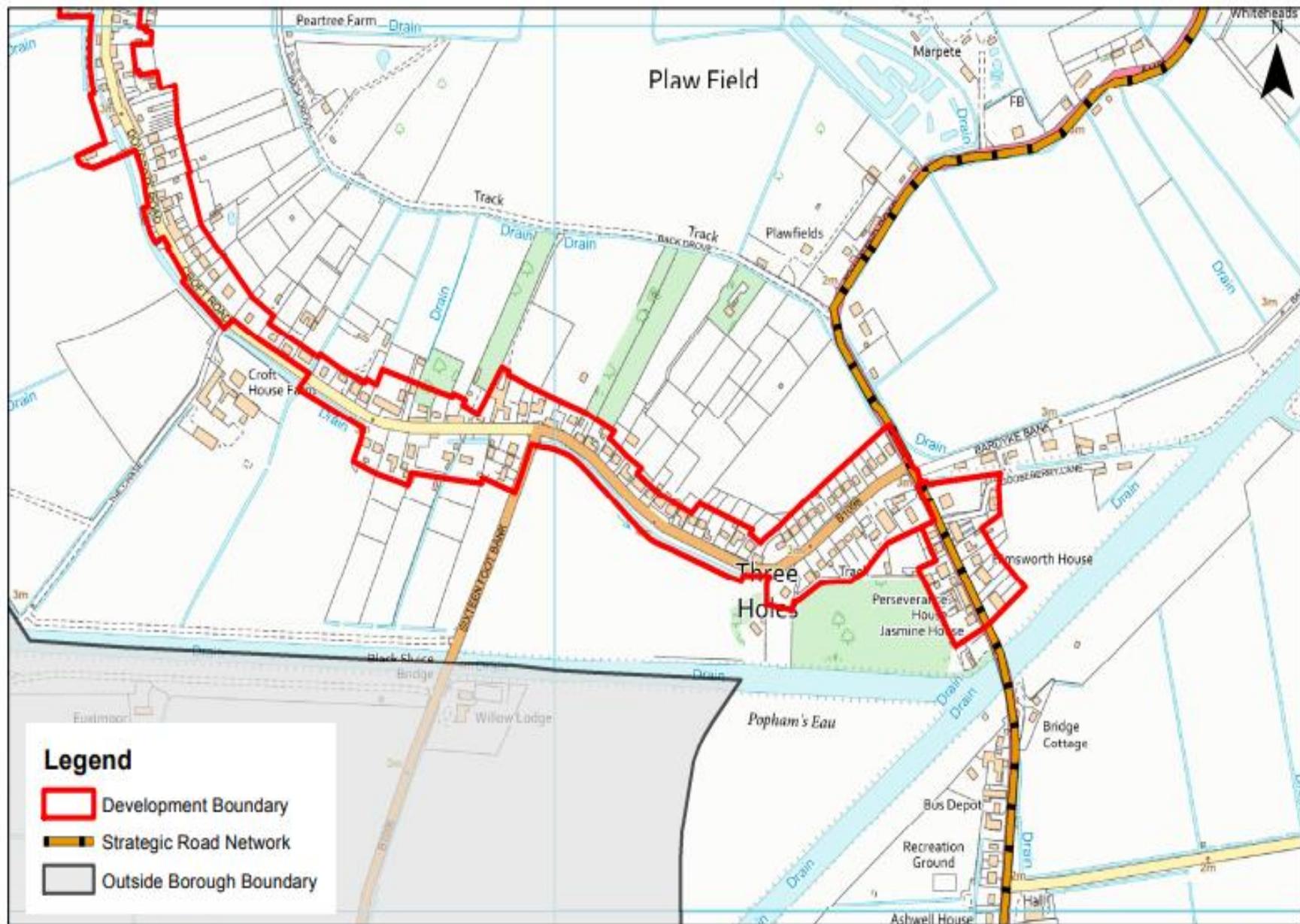
14.21.2 Three Holes is designated as a Rural Village. A site known as Policy G96.1 Land adjacent to 'The Bungalow', Main Road was allocated by the SADMP (2016) and has since come forward for planning permission (15/01399/O & 15/01402/O, 17/01371/RM & 17/01372/RM) for 4 dwellings and has been built out. Accordingly, the allocation has been removed from the plan and has been included within the development boundary.

Neighbourhood Plan

14.21.3 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Three Holes lies within the Parish of Upwell

14.21.4 Upwell Parish Council is in the process of preparing Neighbourhood Plan for their Areas. The Upwell Neighbourhood Plan Area was formally designated by the Borough Council 02/12/2015 and corresponds with the boundaries of Upwell Parish.

14.21.5 The Parish Council is currently preparing a draft version of their Neighbourhood Plan for consultation. Their Neighbourhood Plan will assess sites and allocate sites to meet the agreed identified need. The Neighbourhood Plan is currently in the examination stage of the plan process,



14.22 Tilney All Saints

Rural Village

Description

14.22.1 Tilney All Saints is a small village situated approximately three miles southwest of King's Lynn, between the A17 and A47. The village is made up of two parts; Tilney All Saints itself and Tilney High End. The village is located in the Fens. The population of the settlement was recorded as 573 in the 2011 Census⁽⁶⁰⁾.

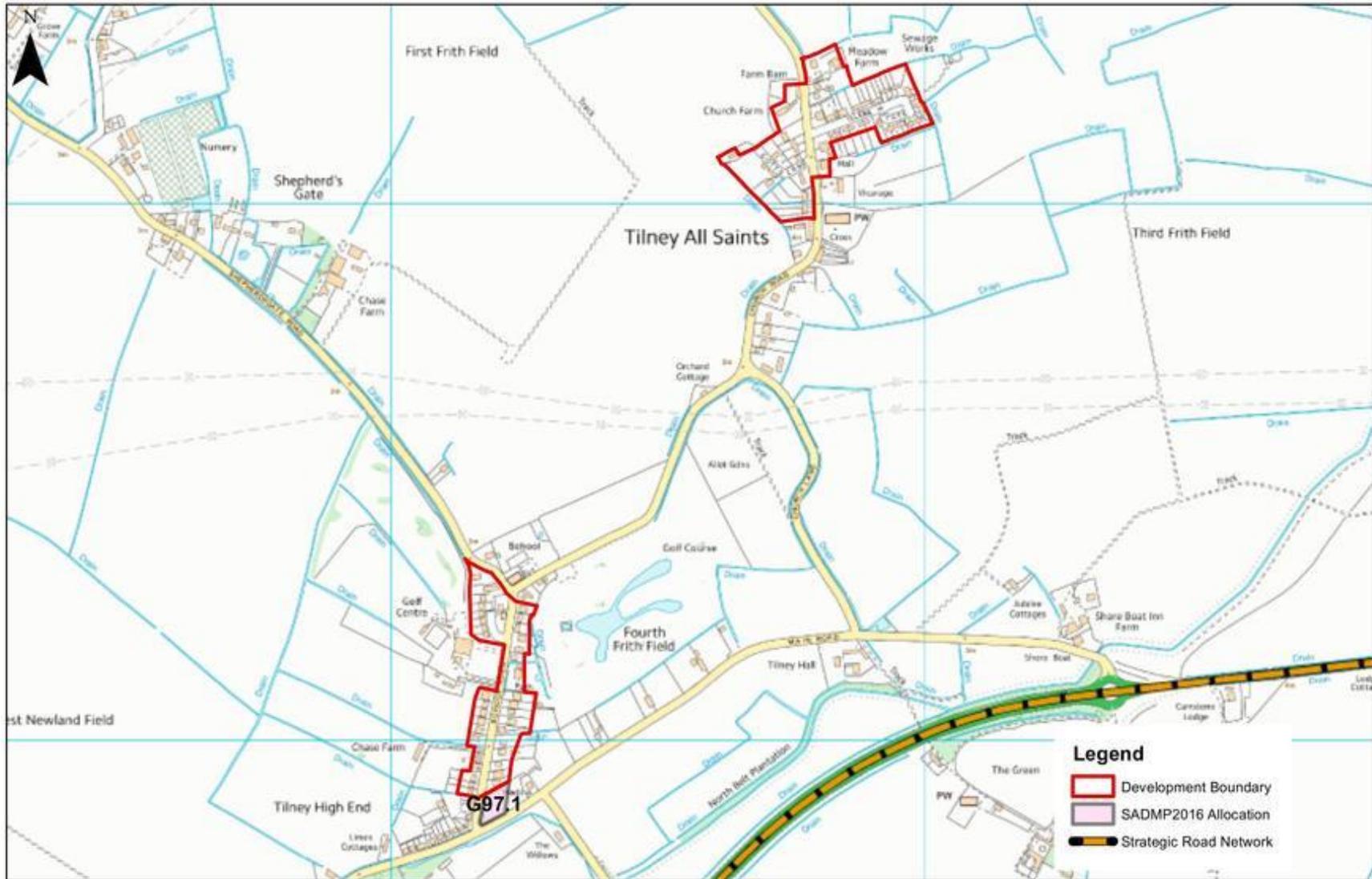
14.22.2 There are limited employment opportunities in the village and the few services include a school, church and bus route.

14.22.3 Tilney All Saints is designated a Rural Village, identified as being capable of accommodating modest growth to support essential rural services. The SADMP 2016 did make an allocation of at least 5 dwellings.

Neighbourhood Plan

14.22.4 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. Tilney All Saints Parish Council is in the process of preparing a Neighbourhood Plan for their Area. The Tilney All Saints Neighbourhood Plan Area was formally designated by the Borough Council 14/06/2016 and corresponds with the boundaries of Tilney All Saints Parish.

14.22.5 The Parish Council is currently preparing a draft version of their Neighbourhood Plan for consultation **and have just completed their regulation 14 stage**. Their Neighbourhood Plan will assess sites and allocate sites to meet the agreed identified need for the village.



n School Road and Lynn Road

Site Allocation

Policy G97.1 Tilney All Saints - Land between School Road and Lynn Road

Land amounting to 0.25 hectares east of School Road, as shown on the Policies Map is allocated for residential development of at least 5 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Provision of affordable housing in line with the current standards.

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Site Description and Justification

14.22.1.1 The allocated site lies south of Tilney High End, Tilney All Saints, on the edge of a built-up area, immediately abutting the development boundary. The site currently comprises of an area of uncultivated flat scrub land designated as Grade 2 (good quality) agricultural land. Although development would result in the loss of good quality agricultural land, all sites within the settlement fall within this category and the scale of development proposed is not likely to have a detrimental impact on the availability of productive agricultural land. The site has defined boundaries in the form of mature hedges and planting. Other than this, there are no landscape features of note within the site.

14.22.1.2 The surrounding area is predominantly residential in character with housing to the north and west and some housing to the east. The site is well screened in terms of views from the wider landscape and it is considered that development is not likely to be visually intrusive in the landscape but would rather be seen in the context of the existing settlement.

14.22.1.3 The site relates well with the existing form and character of the area. Development would form a natural extension of existing residential dwellings along School Road. The site could potentially be developed as frontage development which would be consistent with the form of the adjacent existing development. In addition, the site is significantly closer to the main facilities the settlement has to offer in particular the school and a bus route. The local highway authority has no objections to this allocation. The site is also supported by the local parish council.

14.22.1.4 With regards to flood risk, the sequential test is applied in line with the National Planning Policy Framework. The allocated site is in a lower flood risk area (tidal flood zone 2) compared to other higher flood risk sites in the settlement. Development is subject to the appropriate flood mitigation measures as outlined in the allocation policy above.

14.22.1.5 This site benefits from outline planning permission for 5 dwellings (17/00027/O). A reserved matters application is currently being **considered (18/01627/RM)**.

14.23 Walpole Cross Keys

Rural Village

Description

14.23.1 Walpole Cross Keys is a comparatively small village that lies to the north of the A17 approximately six miles west of King's Lynn and six miles northeast of Wisbech. The village is positioned in the Fens and is mainly linear in form with an area which contains the few services in the settlement. The topography is flat, and this gives the settlement an open feel.

14.23.2 There are limited employment opportunities in the village and few services aside from the school and bus route. The population was recorded as 518 ([61](#)).

14.23.3 Walpole Cross Keys is designated a Rural Village, capable of accommodating modest growth to support essential rural services. On a population pro-rotta basis (see Distribution of Development section) Walpole Cross Keys would receive an allocation of 5 new dwellings. However, no suitable site has been identified in the settlement due to constraints in terms of form, character, highway and access. As such Walpole Cross Keys will not receive an allocation.

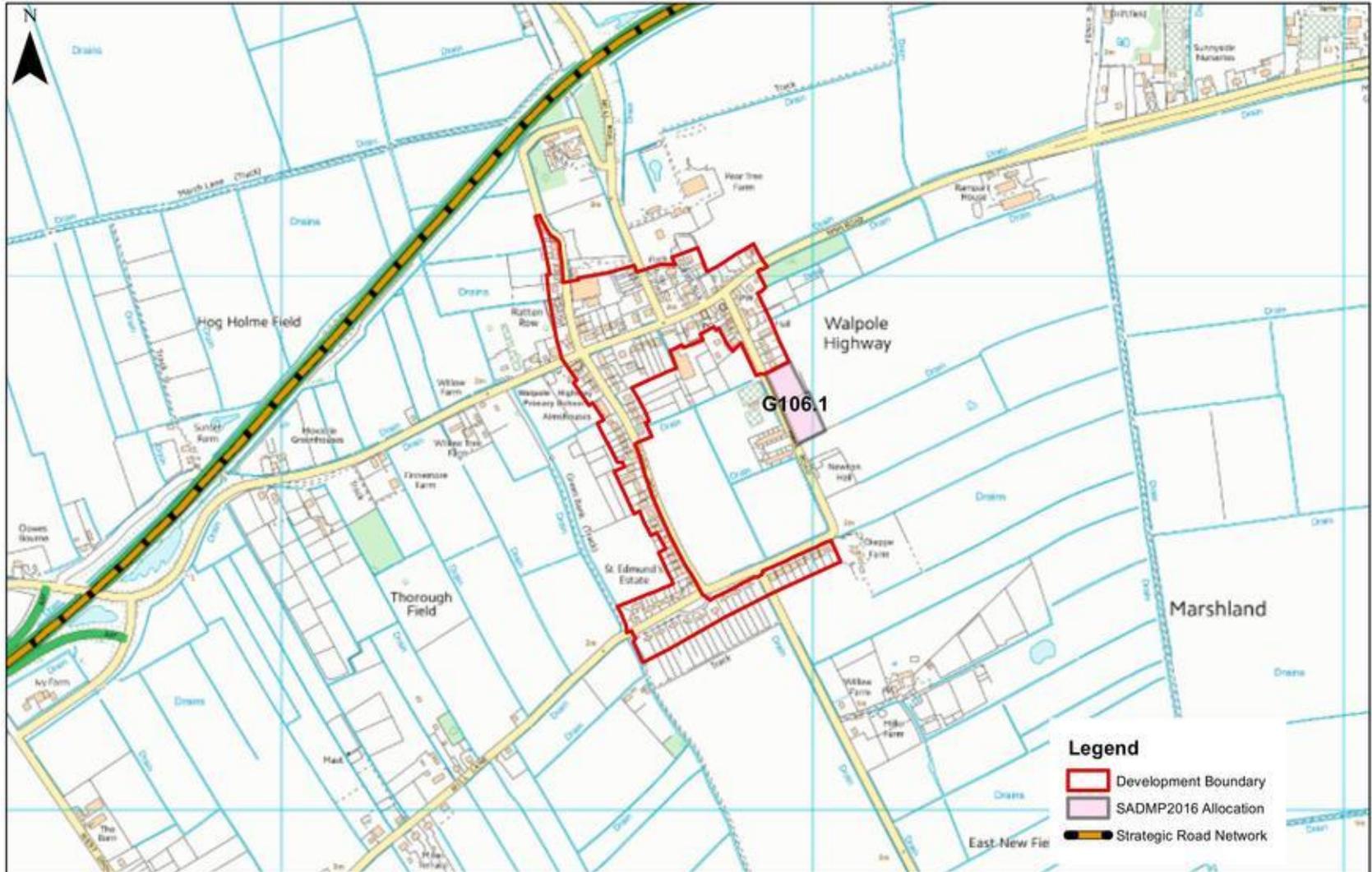
Neighbourhood Plan

14.23.4 The Borough Council supports those Town/Parish Councils and local communities who wish to prepare a Neighbourhood Plan for their Area. The Walpole Cross Keys Neighbourhood Plan was made and brought into force September 2017 and covers the Parish. The map shown comprises those elements from the Neighbourhood Plan, however it is condemned that the Neighbourhood Plan is consulted for further details.

is a relatively small village situated to the south of the A47 approximately 8 miles southwest of King's Lynn. The settlement developed at the point where the old A47 trunk road intersected with a marshland drove. The village has had a peaceful character since the A47 bypass was opened in the 1990s. The form of the settlement was originally linear in form although more recent development has given it a rectangular shape. The village is very open in character with few enclosed spaces.

14.24.2 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([62](#)).

14.24.3 Walpole Highway is designated a Rural Village capable of accommodating modest growth to support essential rural services. The SADMP 2016 did make an allocation for at least 10 dwellings.



14.24.1 G106.1 Walpole Highway - Land East of Hall Road

Site Allocation

Policy G106.1 Walpole Highway - Land East of Hall Road

Land amounting to 0.8 hectares east of Hall Road as shown on the policies map, is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
3. Development is subject to evidence demonstrating a safe and deliverable access and provision of adequate footpath links to the satisfaction of the local Highway Authority;
4. Provision of affordable housing in line with the current standards.

Site Description and Justification

14.24.1.1 The allocated site is situated in a relatively central position on the eastern part of the village. The site comprises of an area of uncultivated scrubland classed as Grade 2 (good quality) agricultural land. Whilst development would result in the loss of good quality agricultural land, this applies to all potential development options in the settlement and on balance it is considered that the benefits of selecting the site outweighs this constraint.

14.24.1.2 Landscape features on the site includes boundary hedgerows and trees. The site is located in a fairly built up area, the surrounding area comprises of open fields to the east, residential development to the north and south-west and green houses to the west. The site is considered to be well related to the existing form of development without encroaching into surrounding countryside. It is screened on the north and south by existing housing and boundary planting. In the medium and long-distance views that are available particularly from the east, development would be seen in the context of the existing village.

14.24.1.3 Walpole Highway is largely characterised by ribbon development along the main routes of the village, and the development of the allocated site would represent a natural continuation of this along Hall Road. The Council considers that the development of 10 dwellings on the site along the road frontage would likely have little impact on the form and landscape character of the locality.

14.24.1.4 In terms of proximity to services, the site is reasonably close to Main Road where the majority of village services are located. Norfolk County Council as the local highway authority made no objection to the allocation of the site for small scale frontage development onto Hall Road, subject to provision of safe access and local improvements to the footway links.

14.24.1.5 The site is identified to be partly within Flood Zone 2 (medium flood risk). However, the site is considered to be more suitable in comparison to other sites at lower degrees of flood risk in terms of form and highway constraints. Development on the site is subject to the appropriate flood mitigation measures as set out in the policy above.

14.24.1.6 The site benefits from full planning permission for 8 dwellings (15/01412/O + 16/00113/O & 16/01036/RM + 19/00541/RM). Currently four dwellings have completed.

Walton Highway

Rural Village

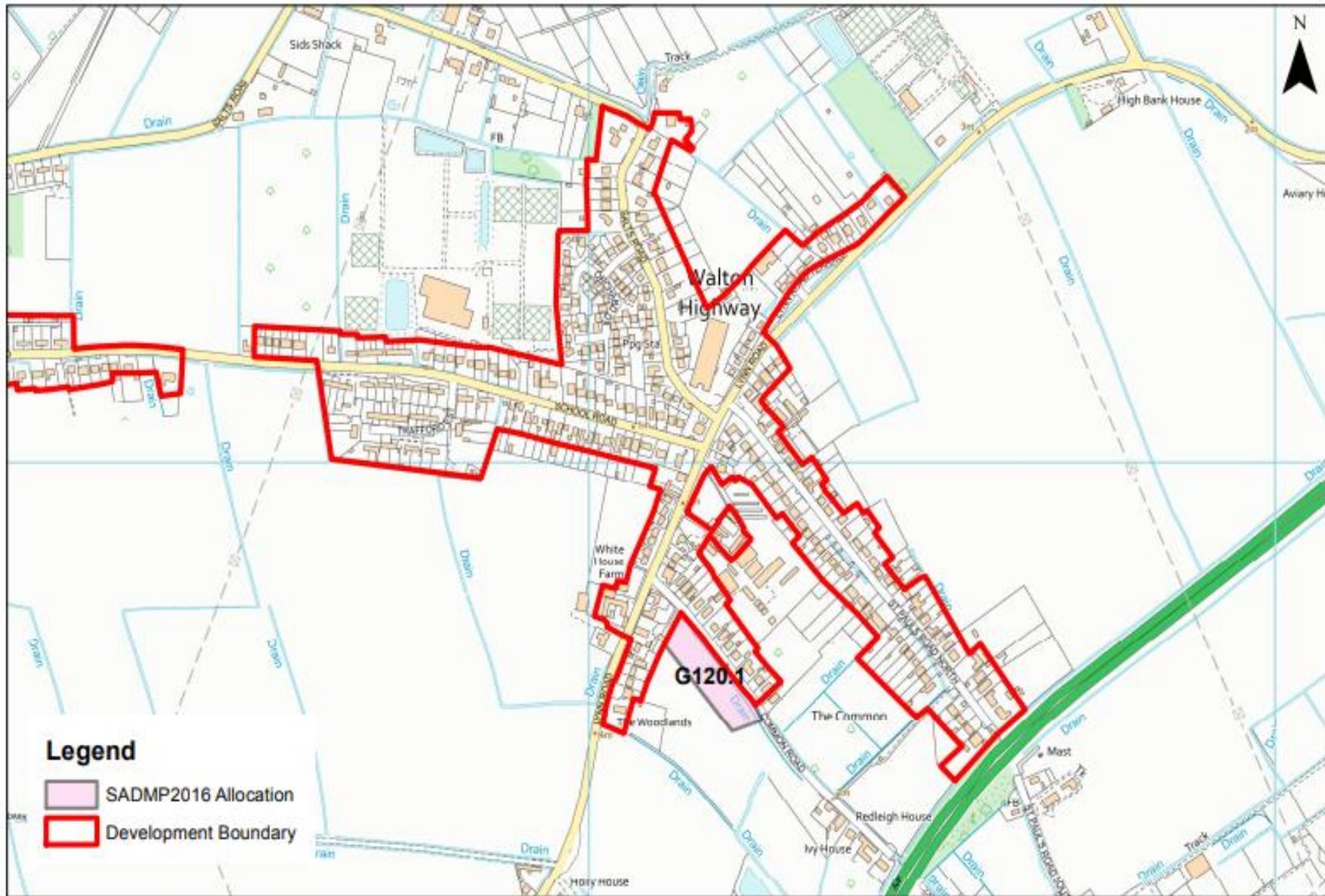
Description

14.25.1 Walton Highway is a marshland villages three miles to the north of Wisbech and approximately 13 miles south west of King's Lynn. The Parish population, which includes both West Walton and Walton Highway, is recorded as 1,731(63)

14.25.2 Walton Highway lies to the west of the A47 and is focused around the intersection at Lynn Road (the former route of the A47). The settlement was originally linear in pattern along this road, but more recent developments have seen the village grow along Salts Road, School Road, St. Paul's Road North and Common Road. While most buildings in the older part of the village are two-storey nearly all new developments are single storey construction.

14.25.3 Previously West Walton and Walton Highway were grouped together to jointly form a Key Rural Service Centre. This is due to the services and facilities shared between the settlements, and the close functional relationship between the two. Accordingly, the SADMP (2016) made two allocations for at least 20 dwellings (G120.1 and G120.2). Due to flood constraints at that time both were located within Walton Highway

14.25.4 Policy G120.2 Walton Highway- Land north of School Road was allocated by the SADMP (2016) and has since benefitted from full planning permission 16/00482/OM & 17/01360/RMM)) for 10 dwellings. The site has been built out, so therefore, the allocation has been removed from the plan and has been included within the development boundary.



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Walton Highway

0 0.05 0.1 0.2 0.3 0.4
Kilometers

14.25.1 G120.1 Walton Highway - Land adjacent to Common Road

Site Allocation

Policy G120.1 Walton Highway - Land adjacent Common Road

Land amounting to 0.83 hectares as shown on the Policies Map is allocated for residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how drainage will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SuDS) should be included with the submission;
3. Demonstration of safe access and visibility to the satisfaction of Norfolk County Council Highways Authority;
4. Provision of affordable housing in line with the current standards.

Site Description and Justification

14.25.1.1 The allocated site is situated south-east of Walton Highway, on the edge of the built extent of the village facing onto detached bungalows on Common Road. The site comprises of Grade 2 (good quality) agricultural land currently in marginal arable use. Although development would result in the loss of productive agricultural land, the entire settlement consists of either excellent or good quality agricultural land but the need for additional housing to sustain existing village services outweighs this constraint.

14.25.1.2 Landscape features on the site includes boundary hedgerows and a number of small trees within the site. Other than this, there are no significant landscape features.

14.25.1.3 The surrounding area is predominantly residential in character with existing housing on the north, east and partly to the west and open fields to the south. It is considered that development in this location would be well related to the character of the surrounding area with minimal landscape and visual impacts in comparison to other considered sites. Views are mostly restricted to near distance from adjacent roads and properties. In the wider views that are available from the south, development would be seen against the backdrop of the existing settlement.

14.25.1.4 Development of the site would form a continuation of housing along Common Road. Immediately opposite the site, on the other side of Common Road is existing linear frontage development. Walton Highway is largely characterised by this pattern of development and the site lends itself to this form of development. In addition, the site is within reasonable walking distance to some services in the village although there is a general scattered distribution of services in the village. The local Highway Authority identified no constraints in terms of access or adequacy of the road network provided safe access and visibility can be demonstrated.

14.25.1.5 In line with the principles of the sequential test, the allocated site is in a lower flood risk area (tidal flood zone 2) compared to other higher risk areas in the settlement (tidal flood zone 3). A flood risk assessment is required prior to development as set in the allocation policy above.

14.25.1.6 In summary, it is considered that the site is of sufficient scale to accommodate 10 dwellings at a density consistent with its surrounding and without detriment to the form and character of the locality.

14.25.1.7 This site benefits from full planning permission (16/00023/OM & 19/01130/RMM, 20/00687/F) for 10 dwellings

14.26 Welney

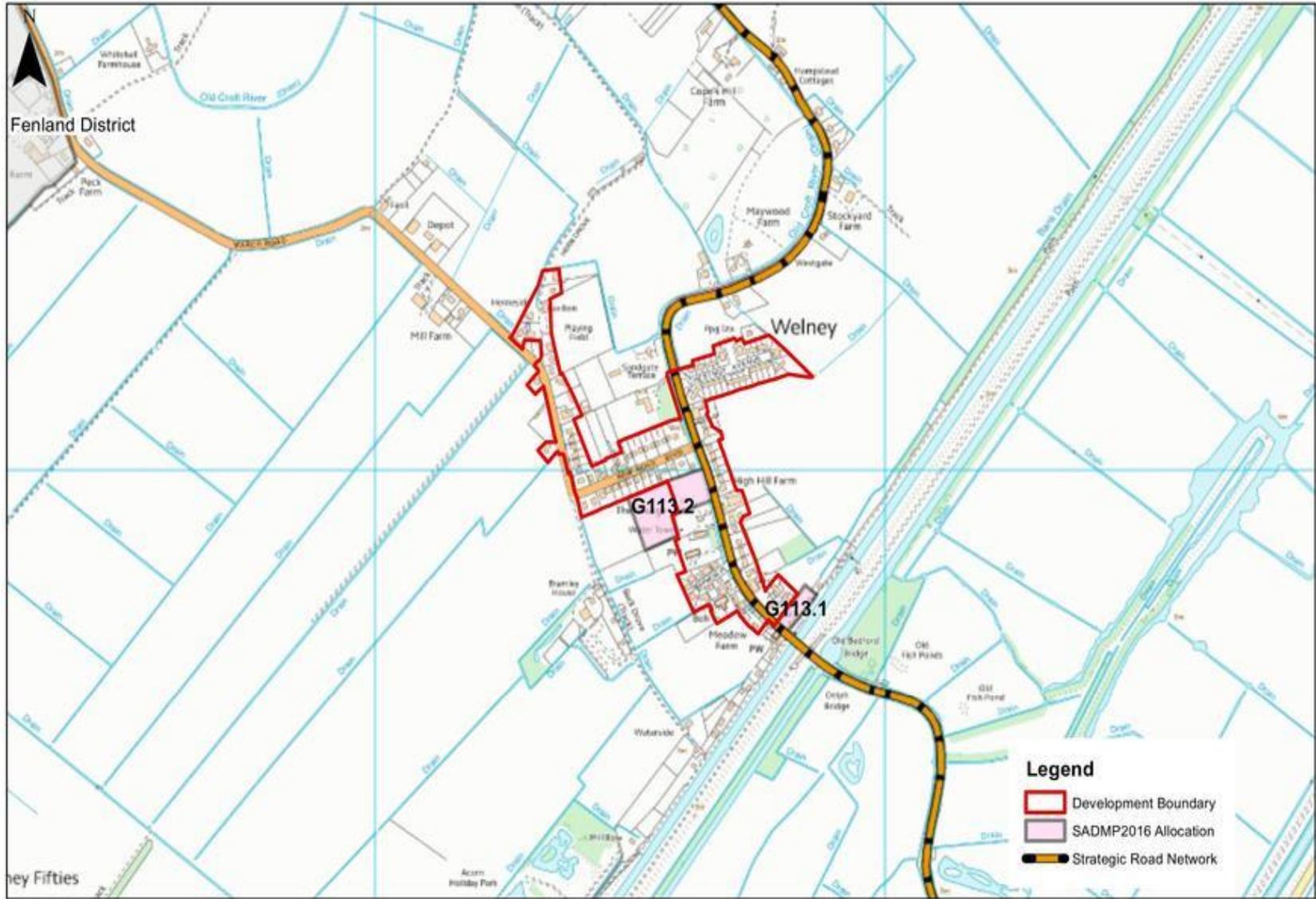
Rural Village

Description and Background

14.26.1 The village of Welney is situated to the southwest of the Borough, 10 miles southwest of Downham Market and 13 miles south of Wisbech. The village lies adjacent to the Old Bedford River and the River Delph and is in curved linear form either side of Main Street, the A1101.

14.26.2 The Parish of Welney has a population of 542([64](#)). The village has a limited range of facilities which include a school, pub, parish hall and playing field with sports pavilion. Welney stands alongside a Wildfowl and Wetlands Trust nature reserve which is internationally designated for its biodiversity, and in particular bird species. The reserve covers approximately 420 hectares in area.

14.26.3 The allocated sites are considered by the Council to have the least impact on the form and character of the settlement and its setting within the countryside. The SADMP 2016 did make 2 allocations for at least 20 dwellings across the 2 sites.



14.26.1 G113.1 Welney - Former Three Tuns/Village Hall

Site Allocation

Policy G113.1 Welney - Former Three Tuns/Village Hall

Land amounting to 0.25 hectares at the Former Three Tuns/Village Hall, as identified on the Policies Map, is allocated for residential development of at least 7 dwellings.

Development will be subject to compliance with the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should suggest appropriate mitigation (flood resiliency measures);
2. Provision of affordable housing in line with the current standards;
3. Any proposal should be accompanied by sufficient information, including drainage arrangements, to demonstrate that there will be no adverse effect on the Ouse Washes Special Area of Conservation, Special Protection Area, and Ramsar;
4. Vehicular access shall be taken from Main Street.

344

Site Description and Justification

14.26.1.1 The allocated site is situated towards the south east of the village. The site is adjacent to the Old Bedford River and a Special Area of Conservation, which in turn adjoins the Ouse Washes Sites of Specific Scientific Interest, Ramsar and Special Protection Area. The site is well located in terms of proximity to the school and access to services and will form a natural extension to the village in keeping the existing character and form.

14.26.1.2 The site is brownfield land and development is linked to the relocation and replacement of the existing village hall. There was a previous planning permission for seven houses on the site, but this has now expired. The Council considers the site is capable of accommodating the 7 residential units required in the settlement at a density reflecting that of the surrounding area. The local highways authority has no objection to this site providing safe access is achieved from Main Street.

14.26.1.3 The whole of the settlement is within Flood Zone 3 and most of the settlement is within the hazard zone. A small area of the allocated site falls partially within a hazard zone however the Council considers due to the brownfield nature of this site and the location within the settlement it is appropriate to develop on this land.

14.26.1.4 The Plan's Habitats Regulations Assessment Report identified the need for checks to ensure no adverse impact on the nearby designated nature conservation areas, and these are included in the policy.

14.26.1.5 The majority of views of the site are limited to the near distance from adjacent roads, properties and public rights of way. Medium and long-distance views from the wider landscape are possible from across the field to the east. In these views the site is seen in the context of the existing village.

14.26.1.6 The Council considers this site to be favourable in Welney due to its accessibility and brownfield nature.

14.26.2 G113.2 Welney - Land off Main Street

Site Allocation

Policy G113.2 Welney - Land off Main Street

Land amounting to 1.25 hectares off Main Street, as identified on the Policies Map, is allocated for residential development of at least 13 dwellings.

Development will be subject to compliance with the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should suggest appropriate mitigation (flood resiliency measures);
2. Improvements to the footway network and safe access to the site Main Street to the satisfaction of the highway authority;
3. Provision of affordable housing in line with the current standards;
4. Any proposal should be accompanied by sufficient information, including drainage arrangements, to demonstrate that there will be no adverse effect on the Ouse Washes Special Area of Conservation, Special Protection Area, and Ramsar;
5. The design and layout of the development shall **preserve** the significance of the Grade II* listed Church of St Mary the Virgin.

Site Description and Justification

14.26.2.1 The allocated site is situated towards the south west of the village. The site is adjacent to the Old Bedford River and a Special Area of Conservation, which in turn adjoins the Ouse Washes Sites of Specific Scientific Interest, Ramsar and Special Protection Area. The site is well located in terms of the overall position within the village, proximity to the school and access to services. The development of the site would be facilitated by its open character and the lack of mature trees within the field itself.

14.26.2.2 The site is currently low-grade agricultural land. The Council considers the site is capable of accommodating the 13 residential units required in the settlement at a density reflecting that of the surrounding area. The local highways authority has no objection to this site providing safe access is achieved accompanied by improvements to the footpath network.

14.26.2.3 The whole of the settlement is within Flood Zone 3 and most of the settlement is within the hazard zone. The Parish Council in their response to the Preferred Options Consultation would like to see an additional allocation up to 20 dwellings in order to maintain the vitality of the village.

14.26.2.4 The Plan's Habitats Regulations Assessment Report identified the need for checks to ensure no adverse impact on the nearby designated nature conservation areas, and these are included in the policy.

14.26.2.5 The majority of views of the site are limited to the near distance from adjacent roads, properties and public rights of way. Medium and long-distance views from the wider landscape are possible from across the field to the west. In these views the site is seen in the context of the existing village.

14.26.2.6 The site has come forward with a full planning proposal and this details 17 dwellings. (18/00195/FM).

14.27 Wereham

Rural Village

Description

14.27.1 The village of Wereham is situated six miles southeast of Downham Market. The older part of the village is focused around the church and village pond, with more recent development forming a linear pattern along Stoke Road and Flegg Green.

14.27.2 The Parish of Wereham has a population 859([65](#)). The village has a limited range of services and facilities which include a pub, a bus route and other employment uses.

14.27.3 Wereham is designated a Rural Village capable of accommodating modest growth to support essential rural services. The SADMP 2016 did make an allocation of at least 8 dwellings.

14.27.1 G114.1 Wereham - Land to the rear of 'Natanya', Hollies Farm, Flegg Green

Site Allocation

Policy G114.1 Wereham - Land to the rear of 'Natanya', Hollies Farm, Flegg Green

Land amounting to 0.77 hectares, as identified on the Policies Map, is allocated for residential development of at least 8 dwellings.

Development will be subject to compliance with the following:

1. Provision of safe access being achieved from Flegg Green to the satisfaction of the local highway's authority;
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Provision of affordable housing in line with the current standards.

Site Description and Justification

14.27.1.1 The allocated site is located to the south of the settlement and is a brownfield site, this previously developed land has not been in employment uses for some time, it is currently containing a number of dilapidated storage structures and is unlikely to be used for employment purposes going forward. The surrounding area consists of residential housing development along Flegg Green. The site is adjacent to the development boundary with open fields to the south.

14.27.1.2 It is considered that development on the site would not be visually intrusive in the landscape. Views of the site are limited to near distance from adjacent roads and properties. Redevelopment of the site has the potential to positively contribute to the street scene and local area. There are few opportunities for medium and long-distance views, in these limited views, development would be seen in the context of the existing built form.

14.27.1.3 Development of the site would form an extension onto the rear of existing housing development along Flegg Green. The site is located relatively close to services and facilities within the village. Access is obtainable from Flegg green, as supported by Norfolk County Council as the local highway authority; this is subject to demonstration of safe access.

14.27.1.4 The site is identified in the Sustainability Appraisal as a suitable option for development in comparison to other options. It is of sufficient scale to accommodate 8 dwellings at a density consistent with its surrounding without detriment to the form and character of the locality. The Parish Council made no objections to the allocation. The site is situated away from the Wereham Conservation Area and development would not have an impact on the intrinsic beauty and distinctive character of this heritage asset.

14.27.1.5 The site benefits from full planning permission for 10 dwellings. (16/01378/FM).

14.28 West Newton

Rural Village

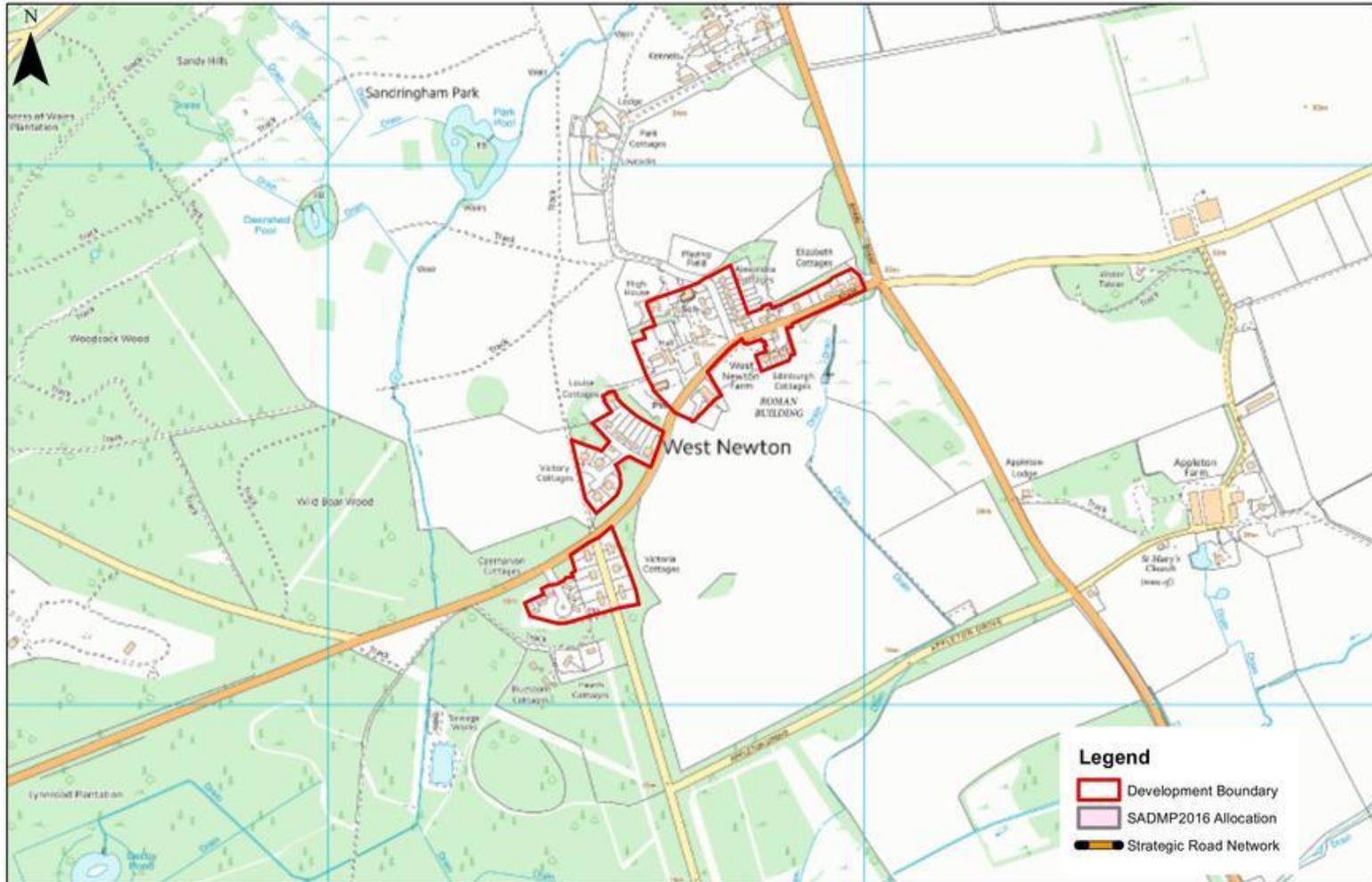
Description

14.28.1 West Newton is a small village located about eight miles northeast of King's Lynn. The village has strong links with Sandringham Estate, encompassing a series of estate cottages within a woodland setting located next to a church. The settlement is partly within Norfolk Coast AONB.

14.28.2 West Newton is located in the Parish of Sandringham, which has a population of 176(66). West Newton supports a primary school, social club, village shop and local bus service, but is otherwise limited in service provision.

14.28.3 West Newton has a small population size and an average level of services for its designation as a Rural Village.

14.28.4 The SADMP (2016) did not make an allocation for West Newton as no sites were available.



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West Newton



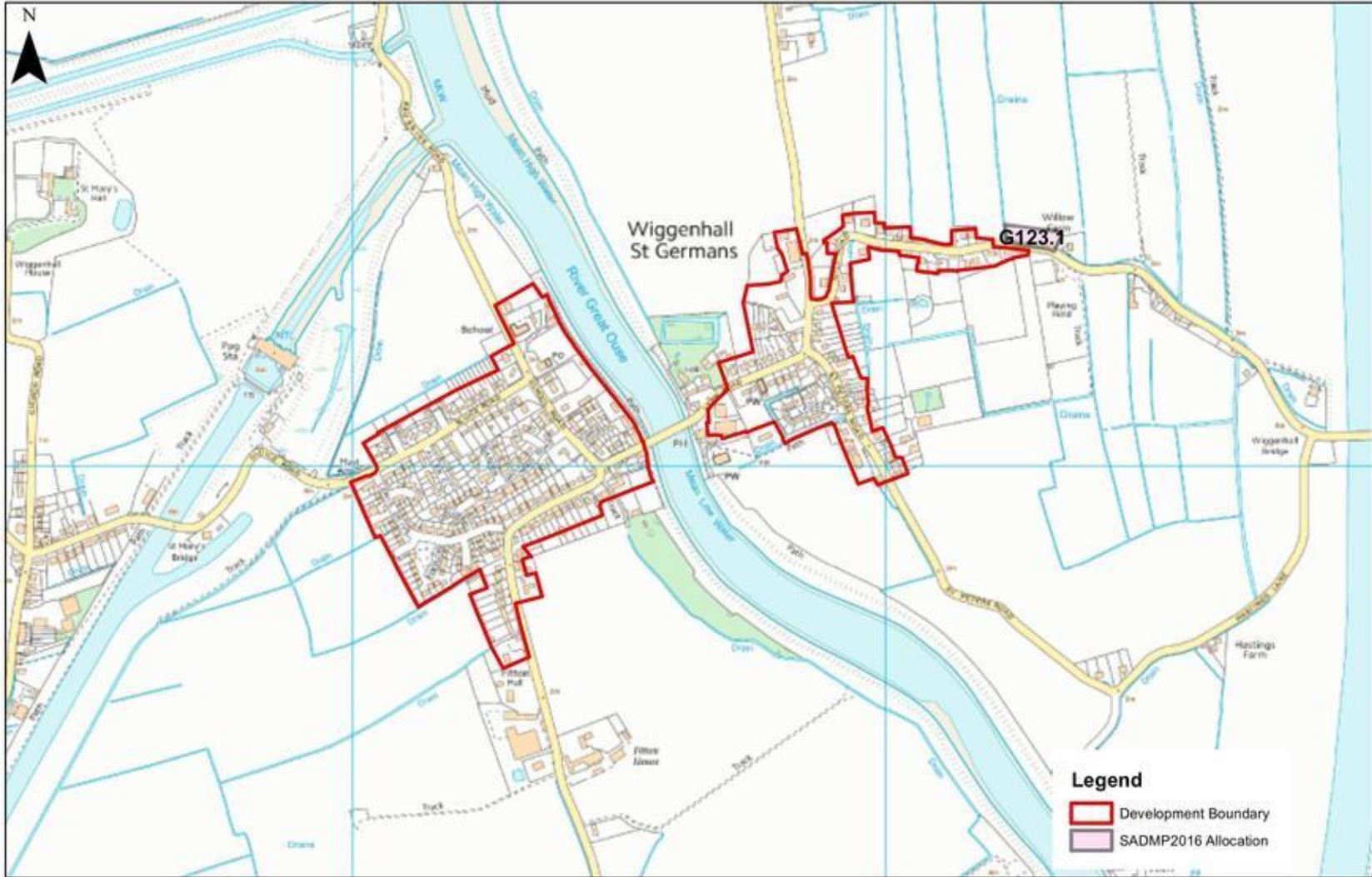
14.29 Wiggenhall St. Germans

Rural Village

Description

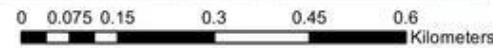
14.29.1 Wiggenhall St. Germans is a large village situated either side of the River Great Ouse at an ancient crossing point, five miles south of King's Lynn. The river meanders through the village and is an important feature of the village but does not dominate its traditional Fenland character. The population of the Parish was recorded as 1,373. (67)The services in the village include a school, church, bus service, shop, and pub.

14.29.2 Wiggenhall St. Germans is designated a Rural Village, capable of accommodating modest growth to sustain essential rural services. The SADMP 2016 did make an allocation of at least 5 dwellings.



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Wigenhall St Germans



Legend
Development Boundary
SADMP2016 Allocation

4.29.1 G123.1 Wiggenhall St. Germans - Land North of Mill Road

Site Allocation

Policy G123.1 Wiggenhall St. Germans - Land north of Mill Road

Land amounting to 0.4 hectares north of Mill Road as shown on the policies map is allocated for residential development of at least 5 dwellings.

Development will be subject to compliance with all of the following:

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. Visibility splays on the road access appropriate for approach speeds of 30mph and offsite highway works to the lay-by, being achieved to the satisfaction of the local highway authority
4. Provision of affordable housing in line with current standards

Site Description and Justification

14.29.1.1 The allocated site is situated north of Mill Road, Wigenhall St. Germans. The site is situated at the edge of the settlement but is adjacent to the settlement with its south-east boundary immediately abutting the development boundary. Open fields border the site on the northern boundary with dwellings neighbouring the site to the east and west of the site. The site comprises of greenfield, grade 2 (good quality) land and development would have an impact on food production as the site is in agricultural use.

14.29.1.2 There are no significant landscape features within the site other than boundary drain and existing Public Right of Way to the east of the site. The site is subject to high flood risk (FZ3) and is located in a Hazard Zone. The site is not screened from the wider landscape on the northern side but in this view, development will be viewed against the backdrop of the existing village. As such it is considered development on the site is not likely to harm the landscape character and visual amenity of the locality. Directly opposite the site there is a local facility with a football field being located there.

14.29.1.3 Development would form a continuation of existing housing on Mill Road without detriment to the form and character of the locality. In terms of visual and landscape impacts development would mostly be seen in the backdrop of the existing settlement and would not cause significant harm to the visual amenity of the area. The site access is obtainable from Mill Road as supported by the Local Highway Authority subject to the design and layout.

14.29.1.4 The site is identified to be the least constrained site over other considered sites in the settlement and is of a sufficient scale to accommodate the 5 dwellings sought in the village at a density that is consistent with its surrounding area.

14.29.1.5 The site benefits from outline planning permission for 4 dwellings (18/02190/O)

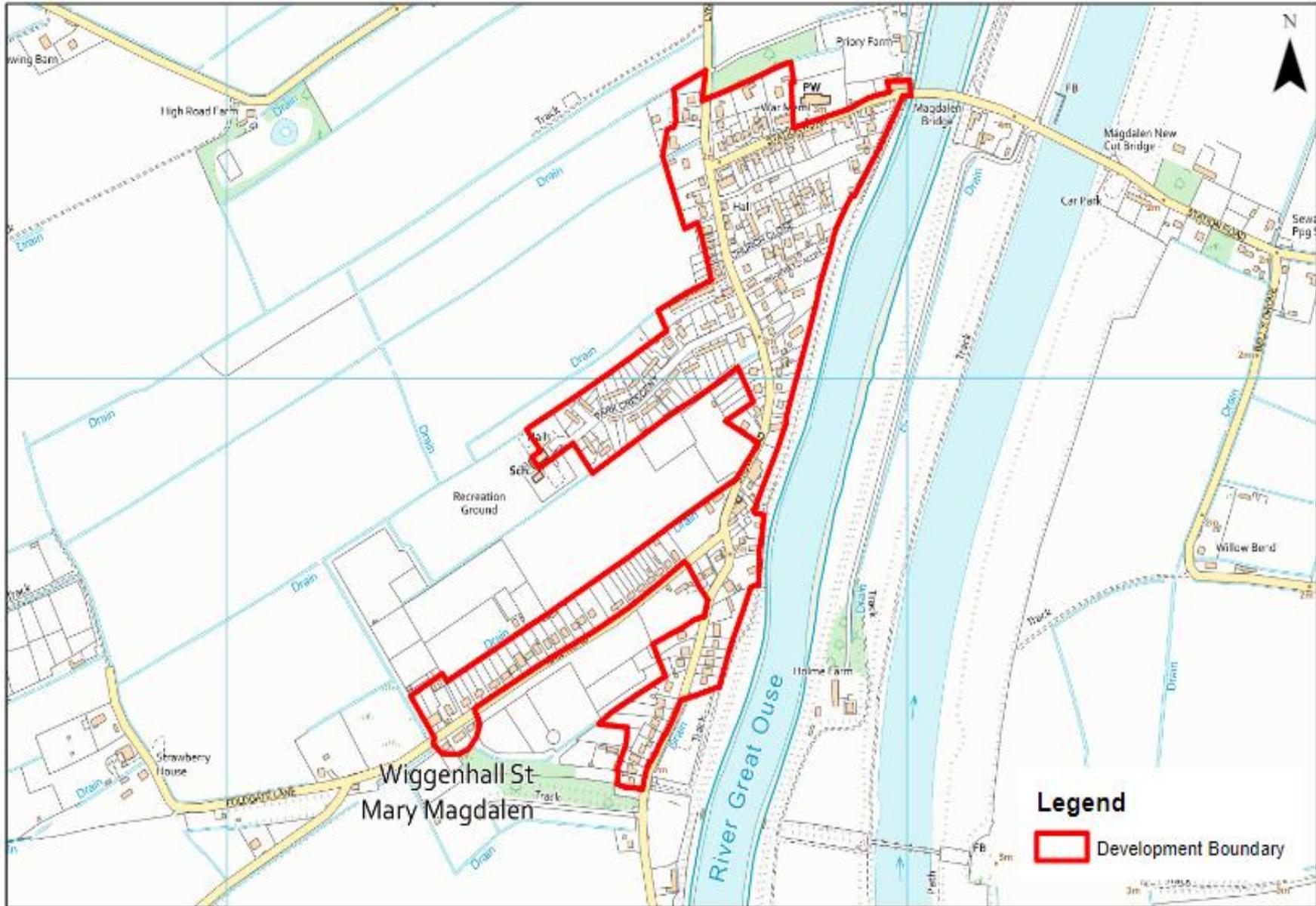
14.30 Wiggenhall St. Mary Magdalen

Rural Village

Description

14.30.1 The village of Wiggenhall St. Mary Magdalen is situated on the west bank of the Rive Great Ouse; seven miles south of King's Lynn. The river clearly defines its eastern edge. In other directions, however, the village is less clearly defined. The area of the village is flat with few trees of significance and there is no obvious focal point; the church and pub being at the northern end of the village near to the bridge in the older part of the village. Most of the older buildings are two-storey, some having small front gardens. There are, however, a considerable number of bungalows and much newer development has been of this type. Wiggenhall St. Mary Magdalen has a few services including a school, shop and a pub. The Parish of Wiggenhall St. Mary Magdalen has a population of 729. (68)

14.30.2 Wiggenhall St. Mary Magdalen is designated as a Rural Village. The SADMP 2016 did make an allocation for at least 10 dwellings under Policy G124.1 Wiggenhall St. Mary Magdalen- Land on Mill Road. However, due to review and the site unable to be delivered within the local plan period the site has been deallocated.



14.31 Wimbotsham

Rural Village

Description

14.31.1 The village of Wimbotsham lies just over a mile to the north of Downham Market. The basic village form is linear, with some growth extending out from the main route through the village. The village centre has an attractive feel which is designated a Conservation Area around Church Road, The Street and the village green which form the centre of the village. The Parish of Wimbotsham has a population of 664(69). The village retains a church and chapel, a primary school, pub and shop as well as a number of independent businesses.

14.31.2 Wimbotsham is designated a Rural Village. Th SADMP sought to make an allocation for approximately 6 new dwellings. Of the sites put forward for consideration, those within the village and to the northern edge were not considered suitable because of their potential adverse impact on the character of the settlement and its Conservation Area, a view that was supported by Historic England. The sites were also considered not accessible by the local highway's authority. Submitted sites on the southern edge of the village are generally not accessible.

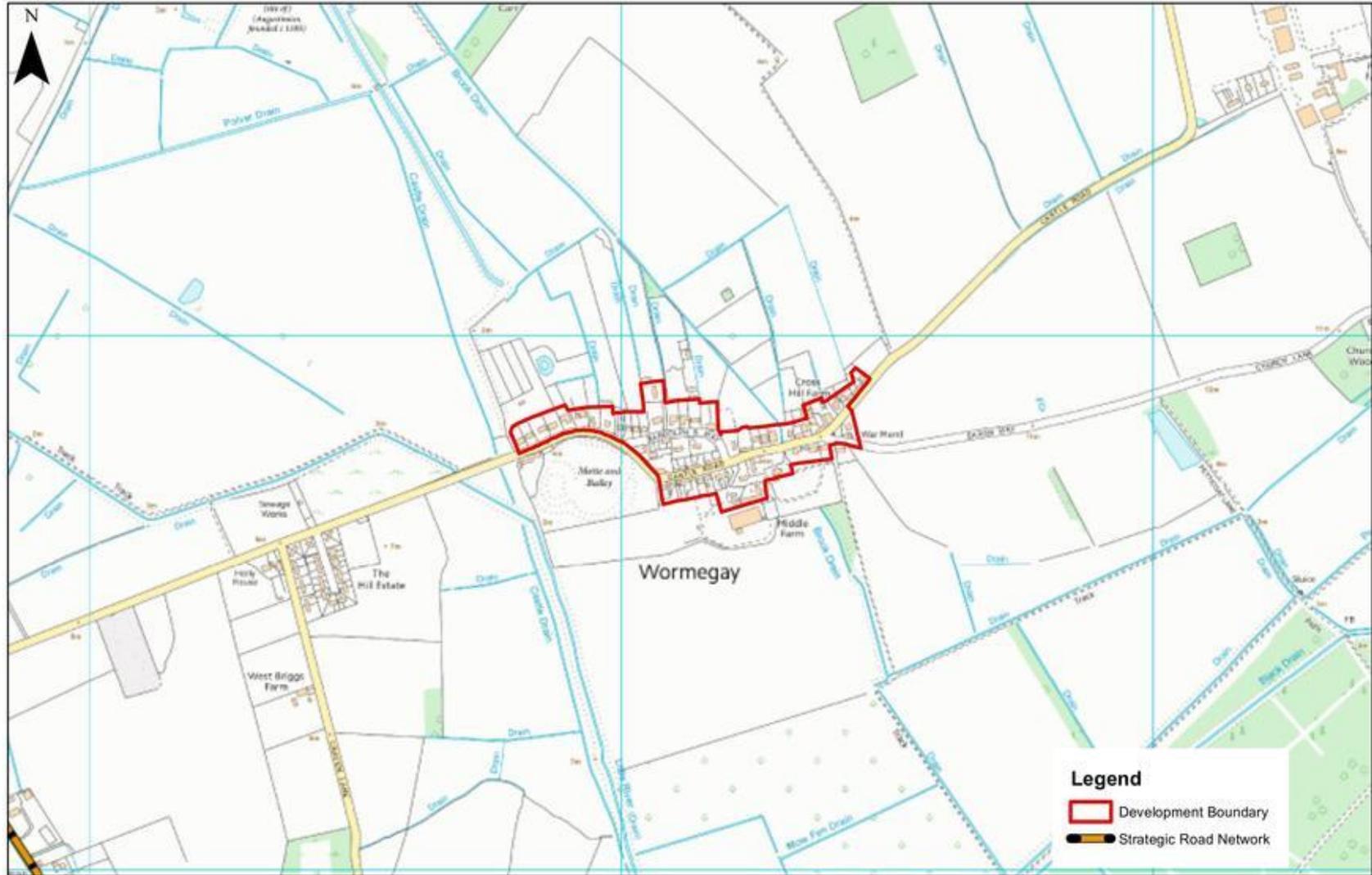
14.31.3 The sites to the south of the village are also parts of larger parcels straddling the gap between Wimbotsham and Downham Market. These have been considered in terms of their potential to provide expansion northward of Downham Market, while maintaining a significant gap between the town and Wimbotsham. Therefore, have been considered as part of the Downham Market section (see earlier section in this document).

14.31.4 The Borough Council considers that the sites which remain as options in the settlement are large sites which abut Wimbotsham and Downham Market. Therefore, no sites have been identified that, in terms of the form, character and servicing constraints of the village, are considered suitable to allocate for residential development.

south of King's Lynn and eight miles north of Downham Market, a short distance from the A134. The village has a population of 359(70). The village is linear in form with development along Castle Road, and more recently Bardolph's Way. There is an abrupt transition from the built extent of the village into open countryside, and it is important to recognise the significant trees around the castle.

14.32.2 The limited local services in the village include a school, a commutable bus route and employment uses.

14.32.3 Wormegay is designated a Rural Village, capable of accommodating modest growth to support essential rural services. The SADMP sought to make an allocation in the region of 3 new dwellings. However, no sites have been identified that are suitable for residential development in terms of form, character, access and servicing constraints of the village. Therefore, the Council has not allocated land for housing in Wormegay.



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Wormegay



15 Smaller Villages and Hamlets

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759523#section-s1542882759523>

Consideration of issues:

- Most of the comments referred to development boundaries for a variety of areas including: Barroway Drove, Congham, Gayton Thorpe and Runcton Holme.
- All DB queries have been dealt with in a separate paper.
- A selection of comments referred to CPRE Pledge

Officer Recommendation:

Amend the text accordingly with reference to adopted neighbourhood plans and changed wording to LP26.

Development boundaries have been dealt with in a separate paper. However, new map required for Congham DB in reference to Parish Council comments.

Supporting text:

Introduction

15.0.1 The following settlements are classed as Smaller Village and Hamlets (SVAH's) within the Settlement Hierarchy.

15.0.2 These settlements do not have any specific site allocations. However, modest levels of development can still take place as each of the Smaller Villages and Hamlets has a development boundary.

15.0.3 Overall development proposals would be judged against the range of policies within the Local **Plan and any adopted neighbourhood plans**. In particular development will need to be consistent with Local Plan Policy LP04 Development Boundaries. Development outside of these Boundaries could potentially take place, providing it is consistent with **Local Plan Policy LP26- Residential Development Reasonably Related to Existing Settlements**.

Smaller Villages and Hamlets (37)			
Barroway Drove	Crimplesham	Pentney	Tottenhill
Barton Bendish	Gayton Thorpe	Ringstead	West Acre
Bawsey	Hay Green	Roydon	West Dereham
Blackborough End	Holme next the Sea	Saddlebow	West Rudham
Boughton	Lakesend	Salters Lode	Whittington
Brookville	Leziate	Shouldham Thorpe	Wiggenhall St Mary the Virgin
Burnham Norton	Methwold Hythe	South Creake	Wretton
Burnham Overy Town	Nordelph	Stanhoe	
Burnham Thorpe	North Creake	Tilney c/w Islington	
Congham	North Runcton	Titchwell	

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response/ Proposed Action
Mr Michael Rayner, CPRE Norfolk	Object	15.0.3- Having given settlement boundaries to these smaller villages within which modest levels of development may take place, it is unreasonable to also allow for the potential of additional development outside the settlement boundaries under Policy LP26. These smaller settlements may be able to sustain modest infill development within the settlement boundaries, but development outside is likely to be unsustainable as well-being against the strategy to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, and its natural resources to be enjoyed by all	Delete: Development outside of these Boundaries could potentially take place, providing it is consistent with Local Plan Policy LP26- Residential Development adjacent to existing settlement Policy.	Noted. The response given in LP26 relates to this point. LP26 is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. Modest levels of development are supported as long as they are consistent with a range of policies within the local plan including sustainability and conserving the countryside.
Mr T Richardson	object	15.0.2- Runcton Holme It is considered that the development boundary as applied to North Runcton does not reflect the extent to the village development- as opposed to the agricultural and common land that lies beyond. The site at Common Lane forms part of a former garden and has no functional relationship to the Common to the west or the fields to the south; it is therefore considered to be part of the village and consideration of aerial photos going back 20	That the land edged red on the attached plan (45 Common Lane, North Runcton) be included within the development boundary for the village of North Runcton.	Noted. Development boundary queries will be dealt with in a separate paper.

		<p>years confirm that it has been garden for a significant period.</p> <p>The site has no alternative use - having been separated from the main house following its redevelopment and it would represent a sensible rounding off of the village form in this instance.</p> <p>The proposed inclusion of the site within the development boundary for North Runcton would not create a precedent as the circumstances of the site and its relationship to the open countryside beyond are very particular.</p>		
Mr Andrew Page	Object	<p>The Congham map indicates the development boundary extending to the west of the property Deerwood up to Broadgate Lane but this land was considered to be in open countryside reference planning refusal 17/00812/F which was upheld at appeal.</p> <p>Any further linear development along St Andrews Lane will further destroy the original spatial development pattern which pre-existed prior to the damage policy DM3 has inflicted on this rural hamlet. Policy DM3 is unsuitable for most small villages and rural hamlets.</p>	<p>The boundary should be amended to the stop on the western boundary of Deerwood with 33 & 34 St Andrews Lane being in open countryside consistent with 12,13 and Bramble Cottage on St Andrews Lane</p>	<p>Noted. Development boundary queries will be dealt with in a separate paper.</p>
Mr & Mrs B Johnson (2 comments)	mixed	<p>1. The introduction of development boundaries is supported.</p> <p>Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently</p>		<p>Noted. Development boundary queries will be dealt with in a separate paper.</p>

		<p>completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p> <p>2. Barroway Drove- The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.</p>		
Holkham Estate	Mixed	The National Planning Policy Framework (NPPF) (Feb 2019) sets out at paragraph 35 the tests for Local Plans to be found sound. It is necessary for Local Plans to be: positively prepared, justified, effective and consistent with		<p>Noted. Support appreciated for 15.0.2 & 3. In reference to point LP01 this is covered in another section.</p>

national policy. These representations are made in this context.

New Residential Development at Smaller Villages. The NPPF acknowledges that “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly” (para 68).

Paragraph 78 of the NPPF advises that “Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” In addition paragraph 77 advises in respect of rural housing that “Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”

Paragraph 15.0.2 of the Draft Borough of King’s Lynn and West Norfolk Local Plan states that these settlements do not have any specific site allocation. However “...modest levels of development can still take place...”. Support is given to this acknowledgement within the Local Plan.

Paragraph 15.0.3 reiterates that “Development outside of these Boundaries could potentially take place, providing it is consistent with Local

		<p>Plan Policy LP26 - Residential Development adjacent to existing settlement Policy.” Support is also given to this acknowledgement within the Local Plan.</p> <p>Despite the above acknowledgments at paragraph 15.0.2 and 15.0.3 of the Draft Local Plan, Policy LP01 ‘Spatial Strategy’ suggests that 5 dwellings will come forward in total across the plan period. This figure appears to be relatively low. It is suggested that the Council produces evidence about the potential for windfall sites to inform the figure quoted at Policy LP01.</p>		
Mrs Rachel Curtis, North Runcton Parish Council	Object	<p>Smaller Villages and Hamlets.</p> <p>We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.</p>		Noted.
Mrs Kate Sayer, Congham Parish Council	object	<p>Congham-</p> <p>The Local Plan review identifies a number of changes to the Congham development boundary which has been extended on the west of St Andrews Lane to the junction with Broadgate Lane, in contradiction of a planning</p>	<p>Summary</p> <p>* Reduce the development boundary to the west of St Andrews</p>	<p>Noted.</p> <p>Development boundary queries will be dealt with in a separate paper. This change has been analysed and the change will be made.</p>

application which was refused in 17/00812/F. west of Deerwood. The boundary has also been modified in the Little Congham settlement complex adjacent to the B1153.

There has already been significant development in this small rural village in the last three years which further exacerbates transport movements along this very narrow St Andrews Lane.

Vehicles can only move in single file, using gateways and 3 passing places; agricultural machinery movements along this very narrow lane have already caused damage to property as it passes through the centre of the village near the Anvil and has cut away the banks along the side of the lane bringing soil onto the lane.

This village has been designated open countryside and previous planning applications have been built in open countryside rather than in infill locations. The Parish Council therefore expects the boundary to be taken back to the edge of the bungalow Deerwood.

The map of the Congham settlement does not include the development boundary along Low Rd and it therefore appears to be in the Key centre of Grimston; this is not the case, as the north side of Low rd is in the parish of Congham and all residents in Low Rd Congham wish to remain on the edge of open countryside. The Parish Council would respect the residents of view on Low Rd and object to any development at HO63, currently designated as greenfield, and as it is in Congham village - open countryside.

Lane.

* Cricket Field (HO62), to be protected as open space under the LP23 policy.

* Reject the site allocation HO63 to the north of Low Rd Congham.

* Provide a suitable Transport solution for access to the town centre via the A148 / Grimston Rd.

		<p>Contrary to the comments on Open Space/ Green Infrastructure in the HELAA document, the open space (Congham Cricket Field) between Congham Hall and the residential development along Low Rd is a vital recreational space which has previously had a planning application for a row of 3/4 houses along its edge, which was refused. This open space requires protection under the LP23 policy as it is regularly used for a range of recreational uses for both Congham and Grimston residents. Congham Parish would strongly object to the HELAA site HO62.</p> <p>Access into Kings Lynn along the A148 Grimston Rd. Congham has previously supported South Wootton in their concerns re traffic along this route, which is already congested at specific times in the day. This is the main route into the the town centre for residents from the north and the east. It is also an essential business route to the North Lynn industrial estate as well as providing access for heavy lorries to access the docks. The transport policy, in relation to the 600 housing development on top of other developments along this route, will need more serious consideration and assessment.</p>		
Ms Sarah Bristow, Gayton Parish Council	object	<p>Gayton Thorpe- We recognise that, as part of the Neighbourhood Plan, the community has the</p>		It is the grant of the qualifying body who are doing a neighbourhood plan to decide

(2 comments submitted same text)		<p>opportunity to (re)define the development boundary of Gayton Thorpe. Nevertheless, the NP is currently not 'made' and so the following comments apply until it is. The idea of development boundaries in Gayton Thorpe is a new one. Previously, the policy has been along the lines of 'modest levels of development to support the needs of the community'.</p> <p>Introducing development boundaries along with policy LP25 and LP26 (although we suggest elsewhere that LP26 is deleted) means that a development boundary is a bit like a magnet – the development boundary is expected to grow. I.e. new development is expected to start against an existing development boundary.</p> <p>Comments:</p> <ul style="list-style-type: none"> - Why aren't all the groupings of buildings in GT surrounded by a development boundary? for example, Great Barn Farm and its cottages which doesn't have a development boundary? - Development Boundaries seem to be a contradiction in terms if they can be (re)moved to suit borough requirements without consideration of a consultation with village residents. 		<p>what they deem suitable for the development boundary for their area.</p>
Mrs Sarah Bristow, Gayton Parish Council	mixed	<p>General comments on Policy G41.1 Why, with the current planning permission of 'at least 23 houses' which has now turned into 40</p>		<p>Noted. This comment refers to section 'KRSC'- Gayton G41.1.</p>

(2 comments submitted same text)		houses has Gayton been allocated an additional 10 houses? With windfall sites outside of your calculations, figures are already inaccurate and this goes against the Borough's Local Plan.		
Mr & Mrs D Blakemore	Mixed	The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.		Support acknowledged. Development boundary queries will be dealt with in a separate paper.
Mr Ian Cable	mixed	Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be		Development boundary queries will be dealt with in a separate paper.

		consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.		
Mr N Good	object	Barroway Drove- The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.		Development boundary queries will be dealt with in a separate paper.
Mr R Garner (2 comments)	mixed	1. Barroway Drove- The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.		Development boundary queries will be dealt with in a separate paper.

		<p>2. The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should eb consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		
<p>Mr A Golding (2 comments)</p>	<p>mixed</p>	<p>1. Barroway Drove- The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.</p>		<p>Development boundary queries will be dealt with in a separate paper.</p>

		<p>2. The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		
Mr David Miller	mixed	<p>The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas,</p>		Development boundary queries will be dealt with in a separate paper.

		those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted		
Mr & Mrs J Clarke (2 comments)	mixed	<p>1. Barroway Drove- The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.</p> <p>2. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development</p>		Development boundary queries will be dealt with in a separate paper.

		boundaries by the time the proposed development boundaries are adopted.		
Mrs A Garner (2 comments)	mixed	<p>Barroway Drove-</p> <p>1. The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.</p> <p>2. The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		Development boundary queries will be dealt with in a separate paper.

Wotton Brothers Farms (2 comments)	mixed	<p>Barroway Drove-</p> <p>1.The development boundary should be extended to include developed areas of The Drove/Cuckoo Road, which form an intrinsic part of the village, which comprises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.</p> <p>2. The introduction of development boundaries is supported. Proposed development boundaries are in consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		Development boundary queries will be dealt with in a separate paper.
Mr L Aldren	mixed	Proposed development boundaries are in		Development boundary queries

		<p>consistent. In some villages the proposed boundaries include areas which have recently completed development, current development and sites with extant permission yet to be built. Whilst other proposed development boundaries exclude such areas. It is considered that proposed development boundaries should be consistent to include existing built up areas, those under development and those with extant permissions yet to be built out. This will provide the most up to date development boundaries by the time the proposed development boundaries are adopted.</p>		<p>will be dealt with in a separate paper.</p>
<p>Mr Andrew Carr, West Rudham Parish Council</p>	<p>object</p>	<p>CPRE Pledge</p>		<p>Noted. Housing Need is now prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.</p>
<p>Mr R G Pannell, Pentney Parish Council</p>	<p>object</p>	<p>CPRE Pledge</p>		<p>Noted. Housing Need is now prescribed by Government if</p>

				they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.
Ms Christina Jones, Holme Next The Sea Parish Council	object	CPRE Pledge		Noted. Housing Need is now prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.
Mrs J Bland, Fring Parish Meeting	object	CPRE Pledge		Noted. Housing Need is now prescribed by Government if they are unrealistic or unfounded than CPRE should

			take this up with Government. We need to be shown to meeting our Local Housing Need, ensure the Local Plan is up-to-date and 'sound' and that at least 5 years' worth of housing land supply is in place and attempt to meet the Housing Delivery Test.
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Environment Agency Consultation Comments Paper

All comments made throughout the local plan review document by the Environment Agency have been collated and responded to under the appropriate headings in the table below.

Policy Number/Title	Environment Agency Consultation comment on the LPR Consultation 2019	Modification	Officer Response / Proposed Action
Key sustainability issues	<p>2.2.1 Details We are pleased to see that flood risk is acknowledged throughout the document as a key factor in decision making.</p> <p>2.2.3 Details This is a positive inclusion, although it could be reworded.</p>	<p>Modification for 2.2.3</p> <p>Bullet point 2 must read as follows: “Much of the borough is low-lying, meaning that it is at risk of flooding. Coastal locations are particularly at risk.</p>	Noted.
Key sustainability issues	<p>2.2.3 Details We welcome the sustainability issues (environment) which will be considered in determining the future of the borough flood risk</p>	<p>Modification The Plan should give consideration to the impact of water quality (including wastewater infrastructure) on</p>	Noted we will make the changes.

	<ul style="list-style-type: none"> • climate change • water resources • the need to protect and enhance the environment • promotion of the use of brownfield land <p>The Plan appears to have considered opportunities that will help to ensure that future development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.</p>	<p>future development. Where relevant, individual developments should aim to protect and improve water quality including rivers, streams and lakes, to help implement the objectives of the Anglian River Basin Management Plan.</p>	
	<p>3.1.2- Paragraph 3.1.2 provides a list of themes considered, we welcome bullet point 10, 'Recognising the importance of future challenges of climate change, including flood risk'. This is a positive inclusion, although it should go further than simply 'recognising' the importance.</p> <p>There could also be reference to the present levels of risk. Flooding risk is not only an impact of climate change. The area is currently at high levels of risk which is managed through an extensive system of flood defence infrastructure. There is a current</p>	<p>Recommend removing the word 'mitigated' in the sentence below. 'The risk of both tidal and fluvial flooding has been reduced or mitigated through the provision of effective defences and the design of new developments in lower lying areas'.</p> <p>There are different priorities for Rural Areas, Coastal Areas and King's Lynn; it would be beneficial to have similar statements in each to reflect the individual situations. For example, Downham Market could focus on surface water</p>	<p>Local Plan is not the vehicle to address future maintenance issues. The LPR recognises the need to avoid undue future risks for new development. Climate change is seen as the wider issue, encompassing flood risk.</p> <p>Accept deleting the word 'mitigated' Whilst the Local Plan must take into account the various types of flood risk in the LPR</p>

	<p>challenge in maintaining the standard of protection.</p> <p>3.1.4- Bullet point 3. Does climate change fit in this paragraph? The sustainability appraisal separated climate change and flood risk due to the current levels of risk posing a significant constraint – this should be reflected in this vision. Under Places (Coastal Areas) it is stated: ‘The threats of coastal erosion and flooding have been reduced or mitigated in a sensitive and sustainable manner, working with local communities. This is a positive inclusion into the plan.</p>	<p>flooding, Kings Lynn could focus on regeneration and breach risk.</p>	<p>(through locational decisions based on the SFRA, the aspiration in the Objectives is to set out a broad approach. Detailed assessments will come later.</p>
LP01 Spatial Strategy	<p>4.1- Add additional text to bullet point b (i)</p> <p>Bullet Point 2e. states: ‘Protect and enhance the heritage, cultural and environmental assets and seek to avoid areas at risk of flooding’</p> <p>Bullet Point 3f, is a positive and realistic statement. There are specific challenges with regeneration sites and there needs to be a careful</p>	<p>4.1- Add wording: without placing assets at risk of flooding. Care is needed when promoting an extended season in this area. There are safe and sustainable ways to achieve this but it should not promote the intensification of existing developments in the neighbouring villages i.e. Heacham and Snettisham</p> <p>2e- Given that flood risk is</p>	<p>This additional text is not required in that other policies deal with detail implementation of development, so as to avoid flood risk e.g. LP15 / 22. No proposed actions</p> <p>2e- As above.</p> <p>Noted 3f.</p>

	<p>balance between the need to redevelop a site and flood risk management. We are happy to work with the LPA to determine how to best manage strategic regeneration sites within the borough.</p> <p>4.1.18- Windfall applications are not included in the overall housing count, there will be additional flexibility in applying the sequential test. Currently there is no position on when windfall development will be refused on sequential test grounds where the risk is not fluvial or tidal.</p> <p>Is there a specific flood risk strategy to put in place for King's Lynn?</p> <p>Policy 3b - We welcome the significant emphasis placed on brownfield redevelopment within the towns and villages. Please note that some brownfield sites may have high biodiversity or geological value; lie within flood risk or sensitive groundwater areas; or be subject to other environmental risks such as historic land contamination. Therefore, developers must have regard to the NPPF</p>	<p>unavoidable in some areas, this bullet point needs to be expanded? e.g. If areas of flood risk are unavoidable, development will be designed in a manner to ensure it will be safe for its lifetime.</p> <p>4.1.23- Clear guidance will be needed for the neighbourhood plans on flood risk planning, including the sequential and exception test. The Environment Agency is willing to work with the Council to support the neighbourhood plans development.</p>	<p>4.1.18- All applications for development in flood risk areas will need to satisfy the relevant policies. E.g. LP22.</p> <p>There is no specific strategy, but the precise locational issues are covered as part of the SFRA.</p> <p>4.1.23- All neighbourhood plans (as appropriate) will need to respect our strategic policies (including flood risk policies) in order to meet the Basic Conditions for NP examination.</p> <p>3b- Noted, individual site requirements will need to be addressed as they arise. No change.</p>
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	<p>policies on the protection and enhancement of the natural environment and consider the environmental impacts of their proposed development along with the scope to mitigate any impacts.</p>		
<p>LP01 Spatial Strategy</p>	<p>Consider adding a statement to encourage developers to ensure that there is sufficient wastewater infrastructure capacity to accommodate any future development</p>		<p>LP01 is a 'strategic' policy. LP05 adequately covers the requirement to appropriate infrastructure. No change</p>
<p>LP05 Implementation Policy (4 separate comments)</p>	<ul style="list-style-type: none"> • Infrastructure Provision Focus- Consider including FCRM for the Fens (Phase 1) under point 4. • Infrastructure Provision- Both SuDS and flood management infrastructure are listed under point 3, which are positive inclusions. 	<ul style="list-style-type: none"> • Para 4.5.9– Modification- There are opportunities to add flood risk management strategies onto the list in paragraph 4.5.9 such as: FCRM for the Fens (phase 1) and the Surface Water Management Plan. • Modification- Consider adding IDBs and Anglian Water. Additionally, partner organisations may be able to provide actual mitigation measures as well as 	<p>Support noted under point 3</p> <p>Agreed. Flooding should be added to the list under point 4 and this change has been made</p> <p>The intention in 4.5.7 is to show future action is needed to keep pace with new development. The complex nature of the issue means that we can flag the issue, but actual solutions will evolve.</p>

		funding.	Add reference to the projects highlighted. Add text to para 4.5.9 has been made.
LP08 Touring and Permanent Holiday Sites	Under Location Requirements, point e), the Plan states: the site is not within the coastal change management area indicated on the Policies Map, or within areas identified as flood zone 3 in the Borough Council's Strategic Flood Risk Assessment. Although small, there may be areas shown to be within the Tidal Hazard Mapping (THM) extent that fall outside of Flood Zone 3	Modification- 3. Sentence could be reworded to include reference to THM extent.	Agreed- change to the text has been made under 1e
LP14 Coastal Areas (2 comments)	Bullet point 2d: Even the retention of the defences would not provide justification for the relaxation of the policy. Improvement of the defences would still place the new development reliant on the existing defences. We do not recommend the inclusion of "or promote the retention and/or improvement of local sea defences." 6.1.3 – Details- A definition of 'high	2d Modification- Remove the wording "or promote the retention and/or improvement of local sea defences." 6.1.3. Modification- Some clarification of what the minimum that any mitigation measures must achieve would be beneficial. The statement is a sequential/exception test position and should be reflected in the	Agree remove wording as requested by Environment Agency. Wording has been removed for 2d 6.1.3. - Agree include a definition of 'high risk' and clarification of the minimum that any mitigation measures must achieve and reflect this in

	<p>risk' would be beneficial. This could be reference to Flood Zone 3, areas shown to flood to a certain depth in the THM etc.</p>	<p>flood risk policy.</p>	<p>the flood risk policy LP22.</p>
<p>LP15 - Coastal Change Management Area (Hunstanton to Dersingham)</p>	<p>6.2.6 – The required standard of protection from tidal flood risk, as stipulated in the National Planning Practice Guidance is one in 200 years (0.5% annual probability). This sentence isn't very relevant. Areas must be protected to this standard to be classed as an Area Benefitting from Defences in the EA Flood Map, but this point is not relevant for the sequential test. The point to make here is that, although there are defences in place, the standard of protection they offer is low so there remains a significant risk of them being overtopped and/or breached within the lifetime of the development.</p>		<p>Agree – amend wording by deleting this sentence and replacing it with the suggested text.</p>
<p>LP15 - Coastal Change Management Area (Hunstanton to</p>	<p>1. Extensions- Ideally this should also restrict extensions that encroach towards the</p>	<p>1. EA subsequently clarified that this may catch a lot things that they would not</p>	<p>1. Agree 2. Agree amend</p>

<p>Dersingham)</p> <p>(9 comments)</p>	<p>defences</p> <p>2. Replacement Caravans - 3. Replacement of existing permitted caravans will be permitted. Should there be an aspiration to improve the resiliency of the caravans through extensions?</p> <p>3. Use of 'should' in policy wording; change to 'must'.</p> <p>4. Replacement Dwellings - Should there be a condition on all applications that remove the permitted development rights as there is a concern that even minor development near the flood defences could pose a risk to them?</p> <p>5. New developments- (1) The following developments will not be permitted within Tidal Flood Zone 3 (including climate change) as designated on the Strategic Flood Risk Assessment (SFRA) Maps. There is a mismatch between the terminology used within the local plan and the</p>	<p>be concerned with so it could be worded something like this:</p> <p>“Extensions that encroach within 16m of the toe of the flood defences will not be permitted.” 16m reflects the Environmental Permitting Regulations requirements for tidal defences. EA are trying to catch those extensions that will further hinder access to the defences.</p> <p>5. . EA subsequently clarified that with the updated sea level allowances released in December 2019, the current mapping of the flood risk along the coast (and along the Tidal River) contains a greater level of uncertainty. Without commissioning an update of the Wash Flood Modelling and the Tidal Hazard Mapping, the only way to account for this uncertainty will be to require applicants to submit an assessment of their tidal flood risk. This will require a broader definition of the area covered by LP15 to include a buffer around the current flood zones/THM extents.</p>	<p>wording to encourage improved resilience/resistance in replacement caravans.</p> <p>3. Agree</p> <p>4. Disagree – this is unnecessary as the area is subject to an Article IV direction removing these rights. We could however reference this in the supporting text.</p> <p>5. Agree – amend policy wording as suggested.</p> <p>6. Agree update para 6.2.2 as suggested</p> <p>7. Agree - include reference to UKCIP in para. 6.2.5.</p>
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	<p>SFRA. Flood Zone 3 is not referenced as 'Tidal Flood Zone 3' on the SFRA mapping.</p> <p>6. Paragraph 6.2.2 needs to be updated or deleted.</p> <p>7. Para 6.2.5 - UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here - UK Climate Impacts Programme (UKCIP) may be a more relevant reference or an additional reference here.</p>	<p>Some rough wording: "This policy applies within the area identified as being at risk of flooding during a 1 in 200 AEP event, now and in the future, either directly or through the failure of the coastal flood defences. An indicative area is illustrated within the Coastal Change Management Area on the Policies Map".</p> <p>8. Replacement Dwellings - 2 d. reword the bullet point, "the dwelling will incorporate flood mitigation and resiliency ..." Modification - Rephrase to: "the dwelling will incorporate resistance and resilience measures...."</p> <p>9. The Coastal Flood Risk Hazard Zone shouldn't be limited to this map, rather it should be a specific flood event scenario. Modification- The area could be the outline for the 0.5% AEP</p>	<p>8. Agree</p> <p>9. The policy wording has been amended in line with the EA's subsequent clarifications of the area affected. We can't add the CCMA to the SFRA mapping. This was completed and published in November 2018.</p>
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		<p>tidal outline, plus an allowance for climate change, and may include a caveat to state that it is subject to change in line with updated climate change allowances. It is also recommended that the Coastal Change Management Area is included on the SFRA mapping.</p>	
<p>LP16 Design and Sustainable Development</p>	<p>We welcome LP16 2a, however, it will be very difficult for the developers of individual developments to provide sufficient evidence to satisfy this requirement – particularly as the largest potential environmental risk is likely to be associated with a water company WRC discharge remote from the site boundary. There is no specific mention of wastewater infrastructure requirements and/or the importance of ensuring that new development does not result in a breach of environmental legislation due to the increased polluting load from</p>	<p>Modification We suggest that there should be a more specific policy requirement: to demonstrate that there is, or will be, sufficient wastewater infrastructure capacity to accommodate each individual development. This would likely take the form of a Pre-Development Enquiry response from Anglian Water submitted in support of each new planning application.</p>	<p>Agree incorporate in policy and supporting text- this has been done.</p>

	wastewater treatment works serving those developments.		
LP16 - Design and Sustainable Development Policy	6.3.19- This should be bookmarked for removal prior to submission to the inspectorate. A document that has not been produced (Level 2 SFRA) cannot steer a document that has been produced (Local Plan).		Disagree – the draft Level 2 SFRA was available when the document was produced. The final Level 2 SFRA was published in July 2019.
LP17 Environmental Assets	We support this policy; it complies with the Defra 25 Year Plan. the policy supports the net gain approach which aims to leave the natural environment in a better state through the development process, by restoring or creating environmental features that are of greater value to both people and wildlife.		Welcome the support.
LP18 Environmental Design and Amenity	We support this policy which states that proposals will be assessed against a number of factors including contamination, water quality and sustainable drainage.		noted
LP20 Green Infrastructure	We welcome this Policy which takes into the NPPF and Defra 25 Year	Modification We recommend that the Plan should encourage	Agree- this has been done.

	Plan. It also promotes cross boundary working, this helps to ensure that strategic priorities across local boundaries are properly co-ordinated.	developers to have regard to the Anglian River Basin Management Plan where relevant.	
LP22: Sites in Areas of Flood Risk	Strategic Policy More detail is required under point 1a. to make reference to detailed requirements of flood risk assessments (FRA).	Modification Consider rewording to: 'A site-specific FRA that considers flood risk from all sources and demonstrates that the proposed development will be safe for its lifetime without increasing flood risk elsewhere and, where possible, reducing flood risk overall. The FRA will need to consider: <ul style="list-style-type: none"> • Climate change in line with allowances detailed in the latest national guidance. • The vulnerability of the users of the proposed development. • Safe access and egress to an area of safe refuge in line with the Flood Risk Assessment Guidance for New Development (FD2320) document'. 	Agree – amended wording.
LP22: Sites in Areas of Flood Risk	There is no reference to the sequential test. The first	Modification Consider rewording to:	Agree this change has been made.

	<p>consideration appears to be applying the exception test without assessing whether development could be located in areas at lower risk of flooding.</p> <p>This also only makes reference to Flood Zones 2 and 3. There may be areas within the THM outlines that are outside FZs 2 and 3. The design guidance relates solely to the exception test. The flood risk policy should consider the sequential test first. Given the complexity of flood risk within the borough, a policy position which clarifies the NPPF position would be beneficial.</p>	<p>'Where sites are at risk of flooding as identified by the Council's SFRA or more recent Environment Agency mapping, and there are no other reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'.</p>	
<p>LP22 - Sites in Areas of Flood Risk Policy</p>	<p>6.9.2 - ...The new SFRA for the Borough was finalised in November 2018. A Level 2 SFRA will also be completed early in 2019. These documents form the basis of the Borough's approach to the Sequential and Exception tests and inform the Sustainability Appraisal of the plan.</p> <p>Some commentary on the outputs from the SFRA would be beneficial – e.g. SFRA indicates risk of flooding in areas by establishing flood zones.</p>	<p>Modification- If sites are already allocated in the plan in advance of the outputs of the Level 2 SFRA how has it been demonstrated that the sites represent sustainable development from a flood risk perspective?</p>	<p>The draft Level 2 SFRA was available to the Council when sites were being considered. It was published in its final form in July 2019.</p>

	When will the Level 2 SFRA be available?		
LP22: Sites in Areas of Flood Risk	<p>6.9.4- the wording regarding opportunities to reduce existing risk of flooding is positive, but some comment to state that the development must not increase the risk of flooding within the development site or in the surrounding area is needed to strengthen the point. Some wording to state that it will need to be demonstrated that development will be resistant and resilient to flooding for its lifetime is required. An assessment of access and egress is also needed.</p> <p>Comment regarding consideration of the impact of climate change is needed. This should state explicitly that climate change allowances considered must be in accordance with the latest national guidance.</p> <p>There is potentially a large amount of information to be covered here and it may be more appropriate to split into bullet point sections for clarity.</p>		Agree – amend wording accordingly.

9.2 Kings Lynn	<p>The order that details of policies are included makes the plan somewhat difficult to read. For example, for the King's Lynn policies, the first map shows locations of allocations E1.4, 1.6, 1.7 and 1.9. From here, a detailed description of E1.4 is included, followed by E1.5 before the location of E1.5 is shown on a map (this is provided later in the document).</p> <p>Although this makes sense in line with the numbering (i.e. 1.4, 1.5, 1.6 etc.)</p>	<p>Modification- it would be easier to have details of all allocations in one location and then move on to the next set of allocations in another location. Alternatively, a more detailed site plan could be provided with each allocation policy description.</p>	<p>All of the King's Lynn allocations are shown on Inset E1 page 152. use of the interactive version of the plan is encouraged.</p>
9.2.1 : E1.1 King's Lynn - Town Centre Policy	<p>There is no reference to requirements for a FRA despite the fact that a number of these sites are at risk of flooding.</p>	<p>Modification- Where it is stated that particular development types are encouraged, include caveat that these must be in line with Policy LP22</p>	<p>Agree include reference to Policy LP22 Sites in Areas of Flood Risk in Policy E1.1 King's Lynn Town Centre.</p>
E1.4 King's Lynn - Marsh Lane	<p>We welcome reference to submission of a site-specific FRA. However, there is inconsistency throughout the plan regarding the amount of detail in wording specifying a requirement for an FRA</p>	<p>Modification FRA requirements must be in line with Policy LP22.</p>	<p>Noted</p>

E1.5 King's Lynn - Boal Quay	<p>The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.</p> <p>Consideration should be given to potential opportunities to improve the condition and standard of protection of flood defences bordering the site in line with relevant climate change flood levels.</p>	<p>Modification</p> <p>Include wording: ‘The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.’</p>	<p>Agree – wording has been included: ‘This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.’ in Policy E1.5 2.</p>
E1.10 King's Lynn - North of Wisbech Road	<p>The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.</p>	<p>Modification - Include wording: ‘The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.’</p>	<p>Agree - Included wording at E1.10 point 1: ‘This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.’</p>
E1.14 West Lynn - West of St Peter’s Road	<p>This site is shown to flood to depths of over 2 metres on the Environment Agency THM. Has any consideration been given to residual risk when applying the sequential test for this site? Provide evidence of sequential test application. Specific consideration will need to be</p>	<p>Modification</p> <p>Include wording: The FRA must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of</p>	<p>Agree - Included wording: This must consider the residual flood risk to the site in the event of breaching and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be</p>

	<p>given to the design of the properties and layout of the site to account for the significant depth of flooding. Careful consideration will need to be given to the design and layout of the development to ensure that it is in line with the flood risk design guidance.</p>	<p>the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>	<p>adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>
E1.15 West Lynn - Land at Bankside	<ul style="list-style-type: none"> • 'Submission of a site-specific FRA' is duplicated in the policy wording (points 2 & 7) • The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site. 	<p>Modification- Remove duplication</p> <p>Modification - Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>	<p>Agree – deleted duplicated point 7.</p> <p>Agree - Included wording: 'This must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'</p>
10.5 Wisbech Fringes (inc.Walsoken)	<p>10.5.7 - ...the village is constrained, and this is in the low to medium risk (category 2). Wording should refer to Flood Zones throughout for consistency and clarity.</p>	<p>Modification Reword to: Only a small part of the built area of the village is constrained by flood risk, with this are being at medium risk of flooding (Flood Zone 2).</p>	<p>Agree – amended wording of 10.5.7 as suggested.</p>
E3.1 - Hall Lane, South	<p>1.e. ...To include public open space for recreation and visual amenity on</p>		<p>Noted</p>

Wootton	the western side of the site in an area not suitable for housing by virtue of flood risk. It is good to see that a sequential approach regarding site layout has been adopted for this site.		
F1.2 - Land off St. John's Way, Downham Market	10.2.2.4 states that the proposed development type (less vulnerable) is compatible with the flood risk classification.	Modification Whilst this is correct, an FRA is still required for the development and this should be specified here	Noted and agreed.
F1.3 - Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane	10.2.3.8 – The site is at little risk of flooding (Zone 1).	Modification Reword to: The site is in Flood Zone 1 and is therefore at low risk of fluvial or tidal flooding.	Noted and agreed change has been made.
F3.1 Wisbech Fringe - Land east of Wisbech (west of Burrettgate Road)	Map included is of poor resolution so it is not possible to determine location/layout of the site.	Modification Provide an additional map with clearer resolution.	Agree- will produce a clearer map at the next stage
G25.1 Clenchwarton - Land between Wildfields Road and Hall Road	This site is shown to flood to depths over 1 metre and up to 2 metres in places on EA THM.	Modification Include wording: The FRA must consider the residual flood risk to the site in the event of breaching	Whilst the EA THM has been superseded by the BCKLWN SFRA 2019, the modification proposed is remains valid. The site

		<p>and/or overtopping of the tidal River Ouse. Where possible, a sequential approach should be adopted regarding the layout of the site, with the most vulnerable development situated in areas at lowest risk of flooding (i.e. shallower flood depths).</p>	<p>benefits from both outline planning permission (15/01315/OM) and reserved matters (19/00913/RMM) for 10 dwellings (granted 08/10/2019). Indeed, a number of conditions have since been discharged. As part of the planning process the EA were satisfied with the flood risk assessment submitted subject to conditions. It is proposed to add the EA's suggested text to the policy clause relating to flood risk and the requirement for a site-specific flood risk assessment for completeness. This amounts to a minor change as it simply adds extra detail.</p>
<p>G35.1 - Feltwell - Land to the rear of Chocolate Cottage, 24 Oak Street Policy</p>	<p>The site is at risk of flooding (partially within Flood Zones 2 and 3) but there is no reference to the requirement for a FRA.</p>	<p>Modification Include wording to state that an FRA is required.</p>	<p>The site has been through the local plan process and was found sound. The Inspector recommended modifying</p>

			<p>the plan to include all of this site as adopted. As part of that process a site-specific flood risk assessment was shared with the EA and as the Inspectors report states the EA concluded they had no objection to the larger site being allocated. In light of the EA's comments it is proposed to update the supporting text as above and include the EA's wording also. The Policy should also be amended to include the flood risk clause to the policy for completeness. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development</p>
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			would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures)
G92.1 Ten Mile Bank - Land off Church Road	The location of the site means that a bespoke flood defence breach analysis will be required to demonstrate the residual flood risk to the site.	Modification Include wording: 'The FRA must consider the residual risk of flooding to the site in the event of a breach of the flood defences. This should include details of the impact and likelihood of a breach occurring.'	Policy G92.1 Land off Church Road was allocated by the SADMP (2016) and has since come forward for planning permission (15/00222/O and 17/01646/RM) for 3 dwellings and has been completed. Accordingly, the allocation has been removed from the plan and has been included within the development boundary
			The site has already been

<p>G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road</p>	<p>12.19.1.5 – ‘In line with the sequential test, the site is located in a lower flood risk area compared to other higher flood risk sites in the settlement. The appropriate flood mitigation measures are required by the allocation policy above.’ Clarify how this conclusion has been reached. The site is entirely within Flood Zone 3 and in an area shown to flood on EA THM.</p>		<p>through the Local Plan process, it is allocated having been found ‘sound’. It now benefits from outline planning permission (17/01649/OM) and reserved matters (19/01589/RMM) has also been approved (27/01/2020). It is proposed to updated this text: All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA2019, therefore there are no sites located within a lower risk flood zone. and update the position with regards to site progress as above.</p>
<p>G93.2 - Terrington St. Clement - Land Adjacent King William Close Policy</p>	<p>Site Description and Justification - There is no detail in this section to demonstrate how flood risk has been considered.</p>	<p>Modification The site is within Flood Zone 3 and therefore justification for allocating the site should be provided. Demonstrate how the sequential test has been carried out</p>	<p>Update text: All of Terrington St Clement is located within Flood Zone 3, therefore there are no available sites located within a lower risk flood zone. The site has already been through the Local Plan process, it is</p>

			allocated having been found 'sound'. It now benefits from full planning permission (17/01450/FM). Indeed the site is currently under construction with 12 of 17 dwellings permitted complete (28/08/2019)
G94.2 Terrington St John, St John's Highway and Tilney St Lawrence - Land north of St. John's Road	12.20.2.3 – '...The site is subject to medium flood risk (FZ2).' SFRA mapping suggests that this site is within Flood Zone 3. Please clarify.		Site has been removed from the LPR.
G109.1 Walpole St. Peter - Land south of Walnut Road	The policy wording and justification makes no reference to flood risk. Given that the site is within Flood Zone 3 on the SFRA mapping, can you please demonstrate how flood risk will be considered and how has the ST been applied?		Noted- the text has been amended in the policy wording and supporting text to make reference to the site being within Flood Zone 3 and how it will be considered. The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from a reserved matters

			app (18/01573/RM) and is awaiting decision for a full planning application (20/00068/FM) for a total of 19 dwellings.
G109.2 Walpole St. Peter - Land south of Church Road	the policy wording and justification makes no reference to flood risk. Given that the site is within Flood Zone 3 on the SFRA mapping, how will flood risk be considered and how has the ST been applied?		<p>Noted- the text has been amended in the policy wording and supporting text to make reference to the site being within Flood Zone 3 and how it will be considered.</p> <p>The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from a reserved matters app (18/01472/RMM), the development has commenced and 6 of the 10 dwellings have been completed.</p>
TSC1 – Terrington St	12.19.4.7 - Can residual risk (EA		EA raise no objection to the planning application

<p>Clement Land south of Northgate Way and west of Benn's Lane</p>	<p>THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?</p>		<p>(18/00940/OM). Site allocation will be carried out in accordance with the BCKLWN SFRA 2019 & The EA / BCKLWN Protocol for Sites at risk to flooding. Policy and text contain relevant flooding clauses/information. Update supporting text accordingly. As above plus: 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 a KRSC, it is centrally located and is classed as previously developed land.</p>
<p>B: Flood risk design</p>	<p>B.0.7 – Reference to use of resilience measures.</p> <p>B.0.7 – reference to use of dam boards or flood doors.</p>	<ul style="list-style-type: none"> • Modification Reword to state that resilience measures need to be to the full height of flood water. 	<p>This was copied from the EA design guide- this text will be changed.</p> <p>The latest version will be referenced via web link</p>

	<p>Raising finished floor levels (FFLs) to the full height of flood water must always be the first priority as it is the most effective and sustainable means of preventing flood water from entering a property. Dam boards/flood doors should only be used in exceptional circumstances where raising FFLs is not possible.</p> <p>B.0.13 – ‘...using dam boards to keep a building dry with two or more metres of water around it would probably, due to hydrostatic pressures, lead to its structural failure...’</p> <p>This sentence is misleading. It suggests that dam boards can be used to prevent flood water entry for depths of up to 2 metres. In reality dams boards are only effective for flood water depths of up to 600mm as there is a significant risk of structural damage is there is a water level difference between the outside and the inside of a buildings of ~600mm or more.</p>		on our website- when this is completed.
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Table of Historic England's comments on the King's Lynn and West Norfolk Local Plan Review- April 2019

All comments made by Historic England have been addressed in the below table in reference to the Local Plan Review.

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN changes
3	Paragraph 2.0.7	Support	The dates now seem to make more sense. Thank you for amending.		<i>Noted.</i>
4	2.0.13	Object	It would be helpful to include an approximate timeframe for the NSPF	Include timeframe	<i>Noted/ Will make this change.</i>
5	2.0.20	Object	remove ' from end of sentence	remove ' from end of sentence	<i>Noted/ Will make this change.</i>
6	2.1.9	Object	We welcome the helpful reference to the heritage of Kings Lynn. We suggest that more could be made of this here, perhaps also including reference to the HAZ.	Amplify including reference to the HAZ.	<i>Noted/- No change will be made reference to HAZ is made in section 9.2.</i>
8	Box	Object	Please refer to Scheduled Monument rather than scheduled ancient monument. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled. This is in line with the NPPF. Please amend Historic Parks and Gardens to Registered Parks and Gardens, again in line with the NPPF. Finally it would be helpful to add the number of conservation areas in the	Change Scheduled Ancient Monument to Scheduled Monument Change Historic Parks and Gardens to Registered Parks and Gardens Add the number of Conservation Areas	<i>Noted/ Will make this change.</i>

			borough.		
13	Box	Support	Welcome the reference to Kings Lynn balancing the needs of conservation with urban renewal and strategic growth.		<i>Support welcomed.</i>
16	Box Bullet 18	Object	Whilst reference to brownfield redevelopment and renewal is welcomed, it would also be appropriate to refer to heritage led regeneration	Add reference to heritage led regeneration	<i>Noted/ Will make this change.</i>
16	Box Bullet 20	Support	We welcome reference to preserving and enhancing this major heritage asset.		<i>Welcome support.</i>
24	4.1.26 second bullet	Object	Typographical error – If, not of Also number bullet points	Change of to if	<i>Noted/ Will make this change.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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30/3 1	Policy LP01 Spatial Strategy	Object	<p>In bullet point 1, we suggest the addition of the word historic before natural environment. The historic environment is more than just the built environment.</p> <p>Suggest changing heritage, cultural to historic environment. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.</p> <p>In bullet point 4 we welcome the reference high quality historic environment in the town. We wonder if bullets g-j would be better as i-iv? We every much welcome reference to the Heritage Action Zone.</p> <p>In bullet 6bi We welcome reference to heritage but suggest the use of the term historic environment instead for the reasons set out above.</p> <p>In Bullet 8 a ii we welcome reference to local character and suggest the addition of the word historic environment. Again in 8 a iv historic environment would be more appropriate than heritage</p>	<p>Add the word historic before natural environment in bullet point 1</p> <p>Change bullets g-j to I – iv.</p> <p>Change heritage to historic environment.</p> <p>In 8 a ii add historic environment In 8 a iv change heritage to historic environment</p>	<p><i>Agree with the changes and will make this change</i></p>
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P40	Policy LP02 Settlement Hierarchy	Object	The third paragraph refers to environmental protection and nature conservation. It should also specifically refer to the conservation and enhancement of the historic environment.	Reference the conservation and enhancement of the historic environment in the third paragraph.	<i>Noted/ Will make this change.</i>
48	Policy LP05	Object	We welcome reference to the historic environment at bullet k. S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. You may wish to clarify this matter in your policy.		<i>Noted- this has been clarified under 1k in the policy</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
P50	LP06 5,1,5	Object	Whilst we welcome reference to the historic environment, the reference to historic built environment implies that this is purely the built environment. We suggest it should read built and historic environment instead. The historic environment is considered the most appropriate term to use as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. It also encompasses buried archaeology.	We suggest it should read built and historic environment instead.	<i>Noted/ this change has been made</i>

P51	Employment allocation Land adj to Hardwick Industrial Est, King's Lynn	-	No comments		N/A
P51	Employment allocation Land adj to Saddlebow roundabout, Kings Lynn	-	No comments		N/A
52	Employment allocation off St Johns Way, SW of Downham Market	-	No comments		N/A
52	Employment allocation adj to A148 s of Hunstanton Commercial	-	See comments later in the table		

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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	Park				
53	Policy LP06 The Economy	Object	Bullet point 5c should also refer to the historic environment Bullet point 6 e should read conserves or enhances the historic environment including the historic character... for greater consistency with the wording in the NPPF.	Bullet 5 c add and historic before environment Bullet point 6e Change to conserves or enhances the historic environment including the historic character...	<i>Noted/ these changes have been made</i>
- 60	Policy LP08	Object	We suggest avoiding using the term 'enabling development' in this context. Enabling development has other definitions and we would generally say that enabling development is development that is contrary to Plan policy and as such has no place in the Plan. We suggest using some alternative wording in this instance.	Replace minimal adverse impact on....historical and natural environment qualities with 'conserve and enhance the historic and natural environment'.	<i>Noted- this change has been made.</i>
75	5.7.7 5.7.8 Policy LP12	Object	Are these lists intended as bullet points? Should the parking study that formed some of the heritage Action Zone work be referenced in this section?	Make lists into numbered bullet points Add reference to HAZ parking study.	Agree - make lists into numbered bullet points. Add reference to the HAZ parking study.
84	Policy LP14	Object	Welcome 1 b but change protecting to conserving and change archaeological to heritage assets in line with NPPF terminology.	change protecting to conserving and change archaeological to heritage	<i>This change has been made.</i>

			Welcome reference to local character of coastal areas in 2e.		
95	Policy LP16 Design and Sustainable Development	Object	We welcome criterion 2a but suggest changing the word protect to conserve in line with the NPPF.	Change protect to conserve	Agree - change 'protect' to 'conserve' in 2a.
97	6.4.1 LP17	Object	We welcome the reference to heritage assets. In first line change historic to heritage assets. Historic Parks and Gardens	Change historic assets to heritage assets. Change Historic Parks	<i>Noted- the change has been made and due to splitting up the policy of LP17 to have a separate historic environment section more text has been included in reference to registered parks and gardens in the supporting text</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
			should be Registered Parks and Gardens and Scheduled Ancient monuments should be scheduled monuments - current preferred terminology	and Gardens to Registered Parks and Gardens and Scheduled Ancient monuments to scheduled monuments	
100	LP17	Object	We welcome reference to heritage assets. However the tests are not exactly consistent with those set out in the NPPF.	Review wording for greater consistency with paras193 -197 of the NPPF.	New policy for heritage provided.

100	Policy LP17 Environmental Assets	Object	<p>This is a very broad policy covering Green Infrastructure, Historic Environment, Landscape Character, Biodiversity and Geodiversity. Whilst this may be acceptable as a Strategic policy, I would expect to see more detail in a Local Plan regarding heritage assets. The policy should also be locally specific. We would suggest that there should be separate policy/policies for the historic environment.</p> <p>In any event, suggest conserve rather than protect in bullet point 1 for greater consistency with the NPPF.</p>	<p>Separate policy/policies for the historic environment. Should cover designated (listed buildings, registered parks and gardens, scheduled monuments and conservation areas) and nondesignated assets, and be locally specific. The policy/ies should also refer to the issue of settings. The issue of Heritage at Risk should also be addressed.</p>	<p>Agree - provide a separate heritage policy.</p> <p>Agree to change to 'conserve' rather than 'protect' in bullet point 1 for greater consistency with the NPPF.</p>
103	Policy LP18 Environment, Design and Amenity	Object	<p>Broadly welcome criterion 1 but again suggest change protect to conserve and use the term historic environment rather than heritage and cultural value.</p> <p>Bullet point 2a - suggest change to impact on historic environment.</p>	<p>Use the terms conserve, and historic environment.</p>	<p><i>Noted/ Will make this change.</i></p>
109	6.7.5 Policy LP20	Support	<p>We welcome reference to the historic environment in relation to green infrastructure</p>		<p><i>Support welcomed.</i></p>
126	Policy LP26	Support	<p>We welcome reference for development to be appropriate to the character of the settlement and its surroundings and the reference to the importance of some gaps which make a positive contribution</p>		<p><i>Welcome the support</i></p>

			to the street scene or views.		
140	The Cultural Context	Support	We welcome the reference to the rich cultural heritage of the area in this section of the Plan		<i>Welcome the support</i>
141	Policy LP32 Community and Culture	Object	We particularly welcome criterion 3c. We suggest that you give some examples of local distinctiveness. Eg building materials flint cobbles and brick, car stone etc. in different parts of the borough as well as building styles? This could be in the supporting text, either in association with this policy and/or the design policy.	Give examples of local vernacular and distinctiveness in different parts of the Borough either in association with this policy or the design policy.	<i>Noted/ Will make this change. Extra text will come in due course.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
145	Chapter 8	Comment	Is there some text missing for Chapter 8? Is this an introductory section to settlements and sites?		No text is missing. The reference to 8-Settlements & Sites as rightly pointed out is introducing the section

145	Policy LP34 King's Lynn Area	Object	<p>We note that you plan to carry forward the existing allocations including West Winch etc. Historic England has some concern at the over-reliance on these and other greenfield sites. Such sites are easy greenfield sites and the danger is that this will stifle urban regeneration and the unlocking of the brownfield sites which the HAZ project is seeking to deliver. How do you aim to ensure that the brownfield regeneration sites come forward?</p> <p>The recent Feasibility Study undertaken as part of the HAZ work looked at the potential of a number of sites in Kings Lynn to be brought forward for (re) development. Whilst we appreciate that not all of these sites will necessarily be taken forward, we would strongly suggest the inclusion of any of the sites that are to be pursued to be included as allocations within the new local plan. It is important that the Plan clearly shows the development strategy and future sites for development to the wider public. The Plan should also indicate how these sites could be developed (based on the findings of the feasibility study). Allocation within the plan could help to bring forward</p>	<p>Specifically allocate some sites from the HAZ Feasibility Study – Unlocking Brownfield Potential</p> <p>Criterion 6 - change protecting for conserving.</p> <p>Add specific reference to local character – describe local building materials/vernacular etc. perhaps in paragraph 9.2.5</p>	<p>Disagree - no need to allocate sites from the HAZ as they can come forward for development in any case.</p> <p>Agree to change protecting to conserving in criterion</p> <p>6. Agree to adding specific reference to local character in 9.2.5.</p>
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			<p>these sites and provide greater certainty.</p> <p>Once it has been decided which of these sites could come forward, the sites should be incorporated into the Local Plan. Ideally reference could be made to these sites in this policy.</p> <p>We welcome criterion 6 although suggest changing protecting to conserving in line with the NPPF wording.</p> <p>We welcome criterion 8 although can we be more specific about local building materials etc.? Perhaps this could be included in paragraph 9.2.5</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
148	9.2.5	Object	We welcome reference to King's Lynn's distinctive identity but more could be said here regarding building materials, styles character etc.	more could be said here regarding building materials, styles character etc.	Agree to adding specific reference to local character in 9.2.5.

151	9.2.19	Object	We welcome the reference to the Heritage Action Zone here but consider that more could be said about what has been done.	Add more regarding the HAZ	Agree – add more text about the King’s Lynn HAZ at 9.2.19.
	Site Allocations – General Comment	Comment	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g.</p> <p>conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set back/breathing space etc.</p>		<i>Noted/ Will make this change</i>

			<p>Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-</p> <p>20140306 Revision date: 06 03 2014</p>		
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			<p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>It would be helpful if there were maps of the allocation sites within the plan e.g. just before each policy. There are for some sites but not all.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Chnages
153	Policy E1.1 King's Lynn – Town Centre	Comment	<p>We welcome reference to historic character, local distinctiveness etc. in criterion 1.</p> <p>Paragraph f on shop frontages is broadly welcomed too.</p> <p>The provision of “larger, modern format retail units” (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets. This applies as much to the Town Centre Retail Expansion Area (Policy E1.2) as it does elsewhere in the town centre.</p>		<i>Noted</i>

	Policy E1.2 King's Lynn – Town Centre Retail Expansion Area	Comment	The provision of “larger, modern format retail units” (paragraph e) will need to be carefully located and designed to avoid harm to heritage assets.		<i>Noted.</i>
	Policy E1.2A King's Lynn – Port Policy	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
158	Policy E1.3 King's Lynn – Gaywood Clock	Object	This area includes a number of grade II listed buildings and the grade II* Church of St Faith. Reference should be made to these listed buildings at least in the supporting text and ideally the policy too.	Reference should be made to the listed buildings at least in the supporting text and ideally the policy too.	Agree included reference to the listed buildings in the supporting text to Policy E1.3 para. 9.2.4.1.
160	Policy E1.4 King's Lynn – Marsh Lane	-	No comments		<i>No comment.</i>

163	Policy E1.5 King's Lynn – Boal Quay	Object	<p>The King's Lynn Conservation Area lies immediately to the east and north of this site. The Conservation Area includes a large number of listed buildings near to this site, many of which are listed at grade II but also including the Church of All Saints which is listed at Grade II*.</p> <p>Whitefriars Gateway scheduled monument lies on the eastern boundary of the site. Any development of the site therefore has the potential to impact upon the setting of these heritage assets. The broad principle of redevelopment of this site is acceptable and a Masterplan exists for site.</p> <p>Whilst the draft policy refers to the need for archaeological assessment, it should also refer to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area (similar wording is used for other site policies). There is no reference to the Waterfront Regeneration Area masterplan either, so it is not clear whether this document remains valid and whether the site can accommodate 350 dwellings (and</p>	<p>Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area.</p>	<p>Agree - Add reference to the need to conserve and enhance the significance and setting of nearby heritage assets, specifically listed buildings and the conservation area to the Policy with appropriate supporting text.</p> <p>This has been done</p>
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			<p>potentially other uses).</p> <p>As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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166	Policy E1.6 King's Lynn – South of Parkway	-	No comments		<i>No comment.</i>
168	Policy E1.7 King's Lynn – Land at Lynnsport	-	No comments		<i>No comment.</i>
169	Policy E1.8 King's Lynn – South Quay	Support	As with Boal Quay, this is a sensitive site within the historic core of King's Lynn, located within the conservation area and contains/adjoins listed buildings. We welcome the reference to retaining the listed Sommerfeld and Thomas Warehouse, submitting an archaeological assessment, retaining Devil's Alley as a public right of way and the sympathetic design approach to address the conservation area and nearby listed buildings.		<i>Support noted</i>
172	Policy E1.9 King's Lynn – Land west of Columbia Way	-	No comments.		<i>No comment.</i>
173	Policy E1.10 King's Lynn – North of Wisbech Road	Object	Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north of the site. Any development of the site therefore has the potential to impact on the setting of the Conservation Area. Therefore, the policy should include reference to the need for development to preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Add criterion re conservation area Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'	Agree - Added criterion re conservation area 'Development should preserve or where opportunities arise enhance the Kings Lynn Conservation Area and its setting'

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
174	Policy E1.11 King's Lynn – Southgates	Object	Whilst there are no designated heritage assets on the site, the Kings Lynn Conservation Area lies to the north. South Gate, a scheduled monument and listed at Grade I Any development of the site therefore has the potential to impact on the setting of these heritage assets. Therefore the policy should include reference to the need for development to conserve and where appropriate enhance heritage assets and their settings	Add criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'	Agree - Added criterion re heritage assets. 'Development should conserve and where appropriate enhance heritage assets and their settings'
175	Policy E1.12 King's Lynn – Employment Land	-	No comments		<i>No comment.</i>
180	Policy E1.14 King's Lynn – West Lynn – West of St Peters Road	Object	Whilst there are no designated heritage assets on the site, a grade II listed building lies to the east of the site. Any development will need to preserve the nearby listed building and its setting. At present the policy does not refer to the listed building or its setting.	Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'	Agree - Add criterion re nearby listed building. 'Development should preserve the nearby listed building and its setting'

181	Policy E1.15 King's Lynn – Land at Bankside	Object	<p>This site incorporates the former Del Monte site in West Lynn adjoining the River Great Ouse. Like other sites along the riverside in West Lynn, it is sensitive in terms of its potential impact on the historic environment. The site is clearly visible from King's Lynn Conservation Area on the east side of the river and forms the backdrop to this heritage asset and many others (including listed buildings). Part of the significance of the conservation area is its riverside, with views across to a predominantly rural backdrop at West Lynn, including views of St Peter's Church. Views from this part of West Lynn back towards the conservation area are also significant, and one can walk up to the western riverbank and enjoy a panoramic view of the historic quayside of King's Lynn (the introductory paragraph to West Lynn on page 100 recognises such views, noting "there are significant views from and towards the historic waterfront of King's Lynn").</p> <p>We therefore have some reservations with regards to the redevelopment of this site, particularly on the number of dwellings proposed. It could result in an overly urbanised riverside, with a dense and/or tall form of development. This could cause harm to the significance and</p>	<p>Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'</p>	<p>Agree - Add criterion re heritage assets. 'Development should conserve and where appropriate enhance Kings Lynn Conservation Area and associated listed buildings and their settings'</p>
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			setting of the conservation area and other heritage assets. We request that greater clarification is provided with regards to the redevelopment of this site, including the number of dwellings that can be reasonably delivered. The policy itself also needs to state that development should conserve and enhance the significance and setting of nearby heritage assets, particularly the conservation area and listed buildings.		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
185	Policy E2.1 West Winch Growth Area Strategic Policy	Object	<p>Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II* listed Church of St Mary in West Winch the Old Windmill, The Gables and The Old Dairy Farmhouse listed at grade II. Given the scale of the development we suggest that a Heritage Impact Assessment be undertaken now to understand the significance of the heritage assets and make recommendations for the protection of their settings etc. This work should be undertaken in accordance with our advice note on site allocations and should form part of the evidence base for the Local Plan.</p> <p>We note the requirement at criterion 7</p>	Undertake HIA for site in advance of masterplanning and EIP to inform masterplan and provide evidence for Local Plan	Make reference at Paragraph 9.4.1.57 to the other heritage assets listed by HE.

			<p>for a heritage assessment which we welcome. Given that work is commencing on the masterplanning for this site, we suggest that this work should be completed now as part of the evidence base for the Plan. This could then also inform the strategic concept diagram in the Plan for the site.</p> <p>Paragraph 9.4.1.57 Reference should also be made to other heritage assets listed above.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
201	Policy E2.2 Development within existing built up areas of West Winch	-	No comments		<i>No comment.</i>
206	Policy E3.1 Hall Lane, South Wootton	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Grade II* Church of St Mary lies within centre of village to the east of the site, with potential for some impact on its setting and views towards the church. We note the requirement for a heritage assets assessment in criterion f which is welcomed. It would be helpful if specific reference could also be made to the church and views of the church from the site within the policy.</p>	<p>Make reference to the church and views of the church within the policy.</p>	<i>Noted. Will makes the changes.</i>

214	Policy E4.1 Knights Hill	Support	<p>Whilst there are no designated heritage assets with the site, there is a grade II listed as part of the Hotel complex at Knights Hill to east. In addition, Castle Rising (scheduled monument and grade I listed building, and the church of St Lawrence, Castle Rising, also grade I listed) to the north and the remains of the Church of St James (scheduled monument and grade I listed) and a Saxon and Medieval settlement (scheduled monument) to the south. Any development of the site has the potential to impact on the setting of these heritage assets.</p> <p>While there is scope for development on this site, we are keen to ensure that proposals are sympathetic to the historic environment and specific heritage assets. As paragraph 9.6.3 notes there are several heritage assets in the surrounding area, and there may also be on-site archaeology.</p> <p>We welcome the requirement for a heritage assessment and part A (f) of the policy and the requirements for landscape planting along the east and north of the development. Care will need to be taken to ensure that development is not overly prominent along the north and east boundaries in order to lessen impact on nearby heritage assets.</p>		<i>No comment.</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
221	Policy LP35 Downham Market	Object	We welcome the reference to the built and historic environment at criterion 3 of this policy. We suggest replacing the word respect with conserve, more in line with the terminology of the NPPF.	Replace the word 'respect' with 'conserve'.	<i>Noted. Will make the changes.</i>
223	Paragraph 10.2.4 and 5	Support	We very much welcome the reference to heritage assets and local building materials.		<i>No comment.</i>
224	Policy F1.1 Downham Market Town Centre and Retailing	Object	We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Downham Market within the policy as in paragraphs 10.2.4 and 5. This point applies to other similar policies throughout the plan and should be applied to those scenarios too.	Make more detailed reference to the specific character and vernacular of Downham Market within the policy.	<i>No change</i>
	Policy F1.2 – Land off St John's Way, Downham Market	Object	Whilst there are no designated heritage assets within this site, the Downham Market Conservation Area lies to the north east of the site and includes a number of grade II listed buildings at the western end of the conservation area, . Any development of this site has the potential to affect the setting of the conservation area. To that end, we suggest the inclusion of a criterion in the policy to conserve and where appropriate enhance heritage assets and their settings.	Include additional criterion Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings.	<i>Noted- changes have been made</i>

	Policy F1.3 Downham Market North East Land east of Lynn Road in vicinity of Bridle Lane	Support	Whilst there are no designated heritage assets within the site, the Wimbotsham Conservation Area including the grade II* church lies to the north of the site. We welcome the requirement for a heritage assessment and measures to conserve heritage assets as appropriate, given that the site lies within a short distance of Wimbotsham Conservation Area and other heritage assets.		<i>Noted.</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
	Policy F1.4 Down Market South East: Land north of southern bypass in vicinity of Nightingale Lane	Support	We welcome the requirement for an archaeological assessment of this site.		<i>No comment.</i>
241	Policy F2.1 Hunstanton Town Centre Area and Retailing	Object	We welcome criterion 2 and the reference to historic character and local distinctiveness. The policy could be further improved by making more detailed reference to the specific character and vernacular of Hunstanton within the policy.	Make more detailed reference to the specific character and vernacular of Hunstanton within the policy.	<i>No comment.</i>

243	Policy F2.2 Hunstanton – Land to the East of Cromer Road	Object	We continue to have particular concerns about this proposed site allocation and its impact on the historic environment. It has the potential to detract from the significance and setting of Old Hunstanton Conservation Area to the north and Hunstanton Hall to the east (a Grade II registered park). Hunstanton Conservation Area lies to the south west of the site. Although the draft policy refers to the need to minimise impact on these assets (although no mention is made of the Hunstanton Conservation Area and listed buildings) and the submission of a heritage asset statement, development in this location will still represent a marked change in the landscape and the growth of Hunstanton. Furthermore, the introduction of additional planting into the landscape may, in itself, cause harm rather than mitigate impacts.		<i>No change- under construction.</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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			<p>We have previously advised that this site should be moved away from Chapel Bank road by approximately 200 metres to reduce the impact on Old Hunstanton Conservation Area. Limited development to the south of Hunstanton or development immediately to the north of the Downs Road area would be an alternative to this site and more in line with the Core Strategy.</p> <p>Development would cause harm to the significance of several heritage assets and not comply with the NPPF including paragraphs 8c (protecting and enhancing the historic environment as part of the environmental objective of the planning system), 185 (Local Plans setting out a positive strategy for the historic environment) and 32 (avoid adverse impacts on the environment).</p> <p>Whilst we note criteria 5 and 6 of the policy seek to address heritage matters, we remain unconvinced that a Heritage Asset statement would be able to conclude that there will be no negative impact on heritage assets in the locality.</p> <p>However, we recognise that this site was allocated in the previous Local Plan and indeed benefits for outline planning permission.</p>		
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246	Policy F2.3 Land south of Hunstanton Commercial Park	Object	<p>Whilst there are no designated heritage assets within the proposed site allocation, there are two grade II* listed building to the north of the site as part of Smithdon school, the scheduled and grade II* listed remains of the Chapel of St Andrew to the south east and a grade II listed water tower to the west.</p> <p>We continue to have concerns about this site and its impact on the historic environment and remain of the opinion that its allocation should be avoided. As stated in our comments on the Core Strategy, our 2011 response to the Issues and Options consultation, our email dated 20 July 2012, our 2013 Preferred Options response and our email dated 4 March 2014 (and several verbal discussions) as well as our comments on the pre-submission draft, it would harm the significance and setting of the Grade II* listed Smithdon High School to the north and the Grade II* listed and scheduled remains of St Andrew's Chapel to the south-east. Development of the site would further divorce the school from its rural context and surroundings and impact on views to and from the school. Built in the early 1950s, it has associations with agricultural training and was intended to be located on the edge of town. Its setting has already been compromised to the north and west, meaning that its eastern and southern setting is even more</p>		<i>No change.</i>
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			<p>important to maintain. The development site would also detract from the setting of the listed and scheduled chapel, which currently enjoys a largely rural and remote location within the countryside.</p> <p>Although the draft policy refers to the need to minimise impact on these heritage assets (as well as the North Norfolk AONB) and the submission of a heritage asset statement, development in this location will still represent a marked change in the landscape and the growth of Hunstanton. Furthermore, the introduction of additional planting into the landscape may, in itself, cause harm rather than mitigate impacts. The Core Strategy makes it clear that areas for urban expansion are to the east and south of Hunstanton, with the Inspector's report considering that eastern expansion in the Downs Road area is sound (paragraph 82) along with development south of the town to the west of the A149 (paragraph 83). He considered that development to south-east of Hunstanton would have a very detrimental impact on the landscape (paragraph 83). Site F2.3 could be considered within this south-eastern extent rather than part of the Downs Road area (the site does not fall within the urban expansion arrow on the Hunstanton Key Diagram). Alternative sites to Site F2.3 should be considered, such as limited</p>		
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			<p>development to the south of Hunstanton or development immediately to the north of the Downs Road area.</p> <p>We acknowledge that this site was allocated in your 2016 SADMP and indeed permission has been granted in 2016 for the site. However, we continue to have concerns regarding this allocation and the impact on the historic environment.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
250	Policy F2.4 Hunstanton Lane north of Hunstanton Road	Support	We welcome the requirement for an archaeological field evaluation of the site in criterion 13.		<i>Noted – we welcome the support.</i>
253	Policy F2.5 Hunstanton Employment Land south of Hunstanton Commercial Park Land	Object	We note that this employment site was originally allocated in the 1998 Local Plan, although has not yet come forward for development. It is therefore difficult to argue against the principle of this site, although the lack of development in over 20 years perhaps raises questions about the suitability and viability of this site. The existing employment land to the north is an unfortunate intrusion into the setting of the Grade II* Smithdon High School and it would be a considerable enhancement to this heritage asset if such use was relocated elsewhere. Site F2.5 would add to the urbanisation of Hunstanton to the	<p>The policy should include design criteria in relation to the protection of nearby heritage assets.</p> <p>It would be helpful if the Plan could clarify whether this site has come forward for development to date.</p>	<p><i>Noted. Policy text has been added in relation to the protection of the nearby heritage asset under point 3 a-d.</i></p> <p><i>The site description has been updated. The site currently has outline planning permission.</i></p>

			<p>east of the A149 and to the south of the school and affect the significance and setting of this heritage asset.</p> <p>The draft policy does not contain any detail in terms of the design of Site F2.5, but we feel such detail should be included with regards to the school. For example, we would want to avoid development that was taller or bulkier than the existing employment site to the north, in order to reduce the impacts on the listed school.</p> <p>It is not clear from the Plan whether this site has come forward for development with site F2.4. It might be helpful if the Plan were to clarify this position.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
255	Policy F3.1 Wisbech Fringe – Land east of Wisbech (west of Burrettgate Road)	Object	Whilst there are no designated heritage assets within the site, there is a grade II listed building to the north west of the site. Development of this site has the potential to impact upon the setting of this listed building. There is currently no reference to this nearby heritage asset within the policy. We suggest that the policy is amended to include a criterion for the protection of the setting of the heritage asset.	Include an additional criterion to read, 'Development should preserve the listed building and its setting'.	Agree - amended the wording as suggested.
271	Policy G56.1 Marham Land at The Street	-	No comments		<i>No comment.</i>

272	Policy MAR1 Marham Land off School Lane	-	No comments		<i>No comment.</i>
275	Policy G112.1 Watlington – Land south of Thieves Bridge Road	-	No comments		<i>No comment.</i>
276	Policy WAT 1 Watlington – Land to east of Downham Road and west of Mill Road	Object	<p>Whilst there are no heritage assets within the site boundary, there is a grade II listed building to the west of the site and a non-designated moated site also to the west of the proposed site allocation. The grade I listed Church of St Paul and Peter, the grade II listed Manor House and grade II listed Watlington House also lie in close proximity to the site. Any development would have the potential to impact upon the setting of these heritage assets.</p> <p>We note the inclusion of criterion 4 of the policy that requires a heritage Impact Statement.</p> <p>We have considerable concerns regarding the development of this site at this density, given the proximity of the heritage assets including the grade I listed church. We would recommend an early HIA in advance of the next draft of the Plan to help determine the suitability of the site per se and the extent of the developable area and thus the capacity of</p>	<p>We recommend that an HIA be undertaken now in advance of the next draft of the Local Plan to help determine the suitability of the site per se and the extent of the developable area and thus the capacity of the site. This will then help inform the Plan and any potential policy wording.</p>	<i>Noted. No longer promoting this site.</i>

			the site.		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
283	Policy G13.1 Brancaster – Land to the east of Mill Road	Support	We do not oppose the allocation of this site and welcome the requirement in the policy that development addresses the setting of Brancaster Conservation Area.		<i>Noted.</i>
284	Policy G13.2 Brancaster Staithe and Burnham Deepdale – Land off The Close	Support	We do not oppose the allocation of this site, set at some distance from the Roman Fort scheduled monument.		<i>Noted.</i>
290	Policy BM1 Burnham Market Land south of Joan Short's Lane and east of Creak Road	Object	Whilst there are no designated heritage assets within the site boundary the Burnham Market Conservation Area lies immediately to the north of this site. Crabbe Hall, listed at grade II also lies to the north of the site. Any development in this location has the potential to impact upon the setting of the Conservation Area and the listed building. In particular, consideration should be given to views into and from the Conservation Area from the higher land to the south east. We suggest that you undertake a brief heritage impact assessment in advance of the	Complete a brief Heritage Impact Assessment for the site to consider the likely impact of development on heritage assets. The site should be reduced in size and the policy amended to reference the setting of the listed buildings.	<i>No comment.</i>

			next draft of the Plan to help determine the suitability and extent of the site allocation. We suggest that perhaps only the southern part of this site be allocated to allow for redevelopment of the former farm, leaving the northern half of the site open as protection for the setting of the Conservation Area. We welcome the reference to the setting of the Conservation Area in the policy and paragraph 12.2.1.7. We note that the setting of the listed buildings is also mentioned in paragraph 12.2.1.7 but not in the policy.		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
292	PolicyG17.1 Burnham Market	Object	It is not clear where this policy is in the Plan. There would appear to be a gap after paragraph 12.2.1.12 and the site does not appear on the maps.		<i>Noted. Delete the gaps.</i>
292	paragraphs 12.3.1. and 12.3.2	Support	We welcome these paragraphs and the references to the historic environment and local vernacular.		<i>Noted.</i>

295	Policy G22.1 Castle Acre- Land west of Massingham Road	Object	<p>As commented during the previous local plan consultations, we continue to have some concerns about this site in terms of its location on the edge of Castle Acre Conservation Area and its proximity to a listed building. However, it remains a more preferable site than some other potential sites within the village.</p> <p>The policy requirement for development to conserve the setting of the conservation area and listed building is welcomed and the need for the design and layout to preserve and enhance the conservation area. However, the conservation area character statement identifies an important unlisted building within the site. It is not clear from the policy or supporting text what would happen to this building, with the potential for its demolition and resulting harm to the significance of the conservation area.</p> <p>As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of</p>	Add wording that requires development to retain and conserve the important unlisted building.	<i>No further action.</i>
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			<p>development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p> <p>In order to make the plan sound, there should be wording that requires development to retain and conserve the important unlisted building.</p> <p>We note that planning permission has now been granted for this site.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
299	Policy G25.1 Clenchwarton – Land between Wildfields Road and Hall Road	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
300	Policy G25.2 Clenchwarton – Land north of Main Road	-	No comments		<i>No comment.</i>
	Policy G25.3 Clenchwarton – Land south of Main Road	-	No comments		<i>No comment.</i>
303	Policy CLE1 Clenchwarton – Land to the north of Main Road	-	No comments		<i>No comment.</i>
307	Policy G29.1 Dersingham – Land north of Doddshill Road	Comment	<p>We do not oppose the allocation of this site, but do have some concerns regarding potential impacts on the historic environment, including the conservation area.</p> <p>We welcome the references to the conservation area within the draft policy and the requirement for a Heritage Statement.</p> <p>However, we note that the site has been previously allocated and does now benefit from planning permission.</p>		<i>No comment.</i>

309	Policy G29.2 Dersingham – Land at Manor Road	Object	<p>We continue to have considerable concerns about this site allocation and oppose its inclusion in the plan. We have previously expressed reservations about this site and its impact on Dersingham Conservation Area, the Grade I listed Church of St Nicholas to the north-west and the scheduled medieval moated site to the east. The site is an attractive area of paddock within the conservation area that makes a positive contribution to the significance of the conservation area, the church and the scheduled monument. A development of ten houses in this location would cause considerable harm to the significance of these heritage assets through the urbanisation of their character, appearance and setting.</p> <p>While the policy requires development to conserve the conservation area and the church (incorrectly referred to as the Church of St Mary, rather than St Nicholas), and requires the submission of a heritage statement, this does not overcome our objection to the principle of allocating this site.</p> <p>However, we note that the site has been previously allocated and does now benefit from planning</p>		<i>Noted. Will correct the error.</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
313	Policy G30.1 Docking – Land situated of Pound Lane (Manor Pasture)	Object	We continue to have concerns regarding the proposed allocation of this site and its impact on the historic environment. It is a large site to the north of the conservation area that forms a rural backdrop as one enters or leaves Docking along Pound Lane and Sandy/Bradmere Lane. We note in paragraph G30.7 that the site is bounded by significant trees on its eastern, south-eastern, southern and southwestern sides, and that the overall density will be low, but there is still potential for harm. While the policy requires that development addresses the setting of the conservation area and the submission of a Heritage Statement, we remain cautious about the merits of allocating this site.		<i>We note the concerns. However, the site has been through the full examination and planning approval considered the balance of conservation interests.</i>

			However, we note that the site has been previously allocated and does not benefit from planning permission.		
315	Policy DOC1 Docking Land south of Pound Lane and west of Bradmere Lane	Comment	There are no designated heritage assets within the site boundary. The Docking Conservation Area lies to the north and south of the site. We note the requirement for a heritage asset statement at criterion 2 which is welcomed.		<i>This site is being taken out of the LPR.</i>
319	Policy G31.1 East Rudham– Land off Fakenham Road	-	No comments		<i>No Comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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320	Policy RUD1 East Rudham – Land to north of Lynn Road	Object	Whilst there are no designated heritage assets on the site, a grade II listed building, The Grove Farmhouse, lies to the west of the site. Any development has the potential to affect the setting of this listed building. There are however a number of buildings between the site and the listed building. We note criterion 2 of the policy relating to heritage. We suggest that the wording could be amended to read 'Development should preserve the listed building and its setting'	Amend wording to read 'Development should preserve the listed building and its setting'.	<i>Site is being taken out of the LPR.</i>
326	Policy G34.1 Emneth – Land on south of The Wroe Policy	-	No comments		<i>No comment.</i>
327	Policy EM1 Emneth Land north of Church Road	-	No comments		<i>No comment.</i>
331	Policy G35.1 Feltwell – Land to the rear of Chocolate Cottage, 24 Oak Street	Object	Welcome requirement for archaeological field evaluation but the reference to the NPPF is to the old NPPF paragraph number.	Use correct NPPF paragraph number	<i>Noted- change has been made</i>

332	Policy G35.2 Feltwell – Land north of Munson’s Lane	Object	Welcome requirement for archaeological field evaluation but the reference to the NPPF is to the old NPF paragraph number.	Use correct NPPF paragraph number	Site is not being carried forward.
334	Policy G35.3 Feltwell – Land at 40 Lodge Lane/Sky Gardens	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
335	Policy G35.4 Hockwold cum Wilton – Land south of South Street	Object	<p>We have previously raised considerable concerns in relation to this site, given its proximity to the scheduled monument. We maintain these concerns. We note reference to the scheduled monument in the policy which is welcomed.</p> <p>We acknowledge that the site was allocated in the previous Plan and we note that the site now benefits from planning permission for 3 dwellings.</p>		<i>No further action</i>

453

341	Policy G43.1 Great Massingham – Land south of Walcup's Lane	Object	<p>We have previously expressed considerable concerns about this allocation adjacent to Great Massingham Conservation Area and also situated within the grounds of an undesignated Augustinian priory of potential equivalent value to a scheduled monument</p> <p>The allocation would still have a considerable effect on the significance of the conservation area in terms of development within its setting. The site lies to the west of the network of ponds and green space that run through the heart of the original village and form a large part of the conservation area's significance. It forms part of the approach into the conservation area from Walcup's Lane and is within the setting of the Grade II listed Abbey Farm and other historic buildings. The allocation would immediately adjoin the conservation area and result in modern residential development encroaching onto the historic core of the village. At present, Walcup's Lane forms a clear boundary between the modern and historic parts of the village, and this distinction would be lost. Impacts on the significance of the listed Abbey Farm would be similar and are also relevant.</p>		<i>No further action</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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		<p>In terms of archaeological impacts, the site is located within the grounds of the Augustinian priory. The full extent and significance of the priory has yet to be established, but evidence suggests that the priory extended west along Walcup's Lane, meaning any development in this location could impact on remains of considerable archaeological interest. The site needs to be justified in terms of its archaeological impact, and there may be archaeological remains that would need preserving in-situ depending on their significance. This could affect the deliverability of this site.</p> <p>We still consider that development in this part of Great Massingham is likely to have considerable negative impacts on the village's historic environment, particularly its conservation area and archaeology.</p> <p>We do however welcome the references in the supporting text and policy to heritage including the Conservation Area, listed building and priory.</p> <p>We note that the site was allocated in the previous plan and now benefits from outline planning permission.</p>		
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343	Policy GM1 Great Massingham Lane east of Castle Acre Road	Object	Whilst there are no designated heritage assets within the site, the site lies immediately to the south east of the Great Massingham Conservation Area. Any development has the potential to impact upon the setting of the Conservation Area. We welcome the reference to the Conservation Area in the policy but suggest the wording be amended to more closely reflect the legislation.	Amend wording to read, Development should preserve or where opportunities arise enhance the Conservation Area and its setting.	Remove from LPr
347	Policy G41.1 Gayton – Land north of Back Street	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
348	Policy G41.2 Grimston and Pott Row – Land adjacent Stave Farm, west of Ashwicken Road	-	No comments		<i>No comment.</i>
354	Policy G47.1 Heacham – Land off Cheney Hill	-	No comments		<i>No comment.</i>

356	Policy G47.2 Heacham – Land to the south of St Mary's Close	Object	<p>As preciously advised, the site adjoins Heacham Conservation Area to the east and appears to contribute positively to its significance and setting. Given its sensitive location (also close to the AONB) and relatively small number of dwellings compared to the overall requirement for Heacham (6 out of 66 dwellings), it may be preferable to increase the provision at Site G47.1 (where there are no designated heritage asset issues). Notwithstanding the above, we welcome the reference to the conservation area within the policy.</p> <p>We note that the site was allocated in the previous plan and now benefits from outline planning permission.</p>		<i>No further action</i>
363	Policy G57.1 Marshland St James Land adjacent of Marshland Saint James Primary School	-	No comments		<i>No comment.</i>
364	Policy G57.2	-	No comments		<i>No comment.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
	Marshland St James Land adjacent 145 Smeeth Road				
366	Policy MSJ1 Marshland St James Land south of School Road	-	No comments		<i>No comment.</i>
371	Policy G59.1 Methwold – Land at Crown Street	Object	<p>As stated previously, this site is situated in a very sensitive location within Methwold Conservation Area near to the Grade I listed Church of St George and Grade I listed Old Vicarage. Development would infill open space between the church and historic properties further west along Crown Street. There are prominent views of the church looking north-east along Crown Street from these historic buildings (e.g. 26 Crown Street), with the site situated to the left of this view. Views from the church and churchyard itself look towards the site and out to countryside. Paragraph G59.1 acknowledges the outstanding quality of the streetscape within the village, which includes this location. We are therefore very concerned that development of this site would intrude into such views and streetscape and harm the significance and setting of the church, conservation area and other heritage assets.</p> <p>Notwithstanding the reference to the</p>		<i>No further action.</i>

			<p>conservation area and listed buildings in the policy, (the policy wording only refers to the setting of the conservation area, when the site is actually within the conservation area), we continue to have considerable concerns about this site.</p> <p>However, we note that the site was allocated in the previous plan and now benefits from full planning permission.</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
372	Policy G59.2 Methwold – Land at Herbert Drive	-	No comments		<i>No comment.</i>
374	Policy G59.3 Methwold – Land at Hythe Road	-	No comments		<i>No comment.</i>

375	Policy G59.4 Methwold – Land off Globe Street/St George’s Court	Object	<p>This site is located within Methwold Conservation Area and adjoins a medieval earthwork site of potentially considerable archaeological interest. It is therefore a sensitive location with the potential to have a notable impact on the significance of the conservation area and undesignated archaeology through the loss of open space. However, it does not have the issues that G59.1 has in terms of impact on listed buildings and one of the main routes through the conservation area, and some development could be deliverable.</p> <p>We note the requirement for a heritage statement and archaeological assessment which is helpful.</p> <p>However, we note that the site was allocated in the previous plan and now benefits from full planning permission.</p>		<i>No further action.</i>
379	Policy G60.1 Middleton Land south of Walter Howes Crescent	-	No comments		<i>No comment.</i>
380	Policy MID1 Middleton Land west of School Road	-	No comments		<i>No comment.</i>
383	Policy G83.1 Snettisham Land south of Common Road and behind	-	No comments		<i>No comment.</i>

	Teal Close				
Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
387	Policy G85.1 Southery Land off Lions Close	-	No comments		<i>No comment.</i>
388	Policy SOU1 Southery – Land to north of Lions Close	-	No comments		<i>No comment.</i>
392	Policy G88.1 Stoke Ferry – Land South of Lark Road/Wretton Road	-	No comments		<i>No comment.</i>
393	Policy G88.2 Stoke Ferry – Land at Bradfield Place	-	No comments		<i>No comment.</i>
395	Policy G88.3 Stoke Ferry – Land at Indigo Road/Lynn Road	Object	This site immediately adjoins Stoke Ferry Conservation Area. While we have no objection to its redevelopment, it will need to be handled sensitively to avoid harming the significance of the conservation area and other heritage assets. The policy makes reference to the conservation area, which is welcomed. We note that the site was allocated in the previous plan and now benefits from full planning permission.		<i>No further action.</i>

397	Policy STF1 Stoke Ferry Land to west of Fairfield Road	-	No comments		<i>No comment</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
401	Policy G93.1 Terrington St Clement – Land at Church Bank, Chapel Road	-	No comments		<i>No comment</i>
402	Policy G93.2 Terrington St Clement – Land Adjacent King William Close	Object	Given this site's location, we welcome the recognition given to the conservation area and listed buildings in the draft policy and supporting text. It is not clear which listed building is being referred to in the policy; this would benefit from clarification. We note that the site was allocated in the previous plan and now benefits from full planning permission.	Identify which listed building in the policy and supporting text.	<i>This change has been made.</i>
404	Policy G93.3 Terrington St Clement – Land West of Benn's Lane	Object	Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south west of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.	<i>Change has been made.</i>

			appropriate enhance heritage assets and their settings in both the policy and the supporting text.		
406	Policy TSC1 Terrington St Clement Land south of Northgate Way and west of Benn's Lane Policy	Object	Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south of the site and the grade II listed Tower House to the north of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.	<i>Change has been made.</i>
412	Policy G94.1 Terrington St	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
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	John, St John's Highway and Tilney St Lawrence – Land east of School Road				
413	Policy G94.2 Terrington St John, St John's Highway and Tilney St Lawrence – Land north of St John's Road	-	No comments		<i>No comment</i>
417	Policy TSL1 Tilney St Lawrence Land adjacent to Tilney St Lawrence Primary School, west of School Road	-	No comments		<i>No comment</i>
418	Policy TSL2 Tilney St Lawrence Land to the west of School Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
423	Policy G104.1 Upwell – Land north west of Townley Close	Object	<p>We continue to have concerns regarding the allocation of this site in terms of its historic environment impacts. It adjoins Upwell Conservation Area and is a short distance to the south of the Grade II* listed Welle Manor Hall (only referred to as Grade II in paragraph G104.10). There is also the Grade II listed war memorial immediately to the south-west on the other side of New Road. The site forms part of the gateway into the conservation area along New Road and the approach to Welle Manor Hall. The policy refers to the conservation area which is welcomed.</p> <p>We note that the site was allocated in the previous plan and now benefits from full planning permission.</p>	Amend reference to Welle Manor to grade II* in paragraph 12.21.1.5	<p><i>Made the suggested change to the supporting text.</i></p> <p><i>Upwell Neighbourhood Plan is currently at the decision stage.</i></p>
424	Policy G104.2 Upwell – Land south/east of Townley Close	-	No comments		<i>Noted</i>

425	Policy G104.3 Upwell – Land at Low Side	Object	<p>Whilst there are no designated heritage assets within the site boundary, the Upwell Conservation Area lies to the west of the site. This is a sensitive site on the edge of Upwell Conservation Area. There is currently no development on the east side of Low Side, with open views to countryside from the conservation area and historic buildings. Even just five dwellings in this location could harm the significance and setting of the conservation area. Whilst we welcome reference to the conservation area in the policy and the supporting text, it would be better to allocate an alternative site/s, as there are less sensitive locations in Upwell and Outwell.</p> <p>Based on the above concerns, we feel that the Plan is unsound as the site is not justified in terms of heritage impacts and reasonable alternative sites, nor effective or deliverable against considerable heritage constraints and not consistent with national policy. It would cause harm to the significance of several heritage assets and not comply with the NPPF including paragraphs 8c (protecting and enhancing the historic environment as part of the</p>	<p>The policy would be improved by using the words preserve and enhance the conservation area and its setting.</p> <p>Given the sensitivity of the site and the fact that no permission has yet been granted for this site, we suggest that the opportunity should be taken for the site to be deleted and the dwelling provision relocated elsewhere in Upwell and Outwell where there are fewer heritage issues.</p>	<p>It has been found sound at the Local Plan examination and adopted. It is owned by the Upwell PC and through their neighbourhood plan they have sought to extend this significantly. The Upwell NP has been through the examination process and this. Once the Upwell Neighbourhood Plan has been agreed that it can progress to the referendum</p>
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			<p>environmental objective of the planning system), 185 (Local Plans setting out a positive strategy for the historic environment) and 32 (avoid adverse impacts on the environment).</p> <p>Whilst we appreciate that this site has been previously allocated, the opportunity should be taken for the site to be deleted and the dwelling provision relocated elsewhere in Upwell and Outwell where there are fewer heritage issues</p>		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
426	Policy G104.4 Upwell – Land off St Peter’s Road	Object	<p>This site is located partly within Upwell Conservation Area, with the majority of it lying beyond the conservation boundary to the south. We have previously raised concerns regarding the impact of development on the significance of the conservation area and indeed continue to have concerns. However, we note that the site now benefits from full planning permission. We welcome the reference to the Conservation Area in the policy</p>		<p>No further action- large majority of this site has been built out.</p>

428	Policy G104.5 Outwell – Land at Wisbech Road	-	No comments		<i>No comment</i>
432	Policy G104.6 Outwell – Land Surrounding Isle Bridge	-	No comments		<i>No comment</i>
436	Policy G109.1 Walpole St Peter – Land south of Walnut Road	Object	Whilst there are no designated heritage assets on this site, a grade II listed building lies to the north of the site. Any development of the site has the potential to affect the setting of this listed building. Therefore reference should be made in the policy and the supporting text to the need to preserve the setting of this listed building.	Reference should be made in the policy and the supporting text to the need to preserve the setting of the listed building.	<i>Noted- This has been done.</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
437	Policy G109.2 Walpole St Peter – Land south of Church Road	-	No comments		<i>No comment</i>
438	Policy WSA1 Walpole St Andrew Land south of Wisbech Road	Object	Whilst there are no designated heritage assets on this site, a grade II listed building lies to the west of the site. Any development of the site has the potential to affect the setting of this listed building. Therefore reference should be made in the policy and the supporting text to the	Reference should be made in the policy and the supporting text to the need to preserve the setting of the listed building.	<i>This policy has been taken out of the LPR</i>

			need to preserve the setting of this listed building.		
443	Policy WEW1 West Walton Land north of School Road	-	No comments		<i>No comment</i>
445	Policy LP37 Rural Areas	Support	We welcome criterion 11 of this policy.		<i>Welcome the support</i>
455	Policy G28.1 Denver – Land South of Sluice Road	Support	Whilst there are no designated heritage assets within this site, a grade II listed Manor Farmhouse lies directly adjacent to the site. Development of the site therefore has the potential to impact the setting of this listed building. We note that reference is made to the listed building within the policy which is welcomed.		<i>No comment</i>
459	Policy G33.1 East Winch – Land South of Gayton Road	-	No comments		<i>No comment</i>
462	Policy G36.1 Fincham – Land East of Marham Road	Comment	The Fincham Conservation Area lies to the south of the site but is separated by some buildings. We note that this site benefits from outline planning permission for 5 dwellings.		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
467	Policy G421 Great Bircham and Bircham Tofts – Land Adjacent to 16 Lynn Road	-	No comments		<i>No comment</i>
470	Policy G45.1 Harpley – Land at Nethergate Street/School Lane	Support	We welcome the requirement for an archaeological field evaluation.		<i>Noted.</i>
473	Policy G48.1 Hilgay – Land south of Foresters Avenue	Support	We welcome the requirement for an archaeological desk based assessment.		<i>Noted</i>
476	Policy G49.1 Hillington – Land to the South of Pasture Close	Support	We note that it is proposed to de-allocate this site from the Local Plan. Given the potential archaeological constraints together with the potential impact on the setting of Up Hall, Historic England would welcome the de-allocation of the site.		<i>Noted</i>
480	Policy G52.1 Ingoldisthorpe – Land opposite 143161 Lynn Road	-	No comments		<i>No comment</i>

485	Policy G72.1 Runcton Holme – Land at School Road	-	No comments		<i>No comment</i>
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
489	Policy G78.1 Sedgeford – Land off Jarvie Close	-	No comments		<i>No comment</i>
493	Policy G81.1 Shouldham – Land South of No 1 New Road	-	No comments		<i>No comment</i>
494	Policy G81.2 Shoudham – Land accessed from Rye's Close	-	No comments		<i>No comment</i>
499	Policy G91.1 Syderstone – Land West of No 26 The Street	-	No comments		<i>No comment</i>
502	Policy G92.1 Ten Mile Bank – Land off Church Road	-	No comments		<i>No comment</i>

508	Policy G96.1 Three Holes – Land adjacent to 'The Bungalow' Main Road	-	No comments		<i>No comment</i>
512	Policy G97.1 Tilney All Saints – Land between School Road and Lynn Road	-	No comments		<i>No comment</i>

Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
518	Policy G106.1 Walpole Highway – Land East of Hall Road	-	No comments		<i>No comment</i>
522	Policy G120.1 Walton Highway – Land adjacent to Common Road	-	No comments		<i>No comment</i>
523	Policy G120.2 Walton Highway – Land North of School Road	-	No comments		<i>No comment</i>

527	Policy G113.1 Welney – Former Three Tuns/Village Hall	-	No comments		<i>No comment</i>
528	Policy G113.2 Welney – Land off Main Street	Object	<p>The site adjoins the Grade II* listed Church of St Mary the Virgin, the only designated heritage asset within the village. We are concerned that development on a site as large as this could have a negative effect on the significance of the church through change within its setting. There is currently little development between the church and New Road to the north, which provides the church with an open setting and allows it to be viewed as one travels through the village (bearing in mind it is not a particularly big or tall church). Views of the church from the countryside to the west are also important. There has been unsympathetic cul-de-sac development to the south of the church on Taymor Place, and we would wish to avoid further harm.</p> <p>It may be possible to accommodate limited development fronting Main Street, but we would resist development that extends behind Main Street in a cul-de-sac form.</p> <p>As currently drafted, the plan is</p>	<p>Delete site.</p> <p>If maintaining allocation, change conserve to preserve.</p>	<p><i>Noted/ We will make changes to 'preserve'.</i></p> <p><i>No further action.</i></p>

		<p>unsound in terms of its effectiveness, deliverability and consistency with national policy. The Planning Practice Guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014). Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 185).</p> <p>Notwithstanding our continued concerns regarding this site, we welcome the reference in the policy to the church although the policy would be further improved by the use of preserve in line with the legislation for listed buildings.</p> <p>We note that the site was allocated in</p>		
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			the previous plan and indeed benefits from full planning permission.		
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Page	Section	Support/ Object	Comments	Suggested Change	BCKLWN Changes
532	Policy G114.1 Wereham – Land to the rear of 'Natanya' Hollies Farm, Flegg Green	-	No comments		<i>No comment</i>
537	Policy G123.1 Wiggenhall St Germans – Land North of Mill Road	-	No comments		<i>No comment</i>
540	Policy G124.1 Wiggenhall St Mary Magdalen – Land on Mill Road	-	No comments		<i>No comment</i>
	Glossary	Object	Add scheduled monument, We would refer to Registered Parks and Gardens (NPPF term) and of course, we are now known as	Add scheduled monument, Refer to Registered Parks and Gardens	<i>Noted/ Will make the changes of adding the definitions. The NPPF Term referred to for</i>

			Historic England rather than English Heritage	and change English Heritage to Historic England.	<i>Registered Parks and Gardens falls under 'designated heritage asset' in the NPPF 2019 – this has been referred to in the updated glossary.</i> <i>Scheduled monument has been added and defined from the HE Website</i> <i>The correct reference has been updated from English Heritage to Historic England</i>
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Proposed Development Boundary Changes

A common suggestion/modification which was brought to our attention within the Local Plan Review referred to amending developing boundaries. Analysing the comments, the development boundaries which had suggested changes are listed below in alphabetical order along with officer comments. A hyperlink has also been placed under each settlement heading for readers to see proposed drawings of maps if these were provided or the specific section comments were placed within.

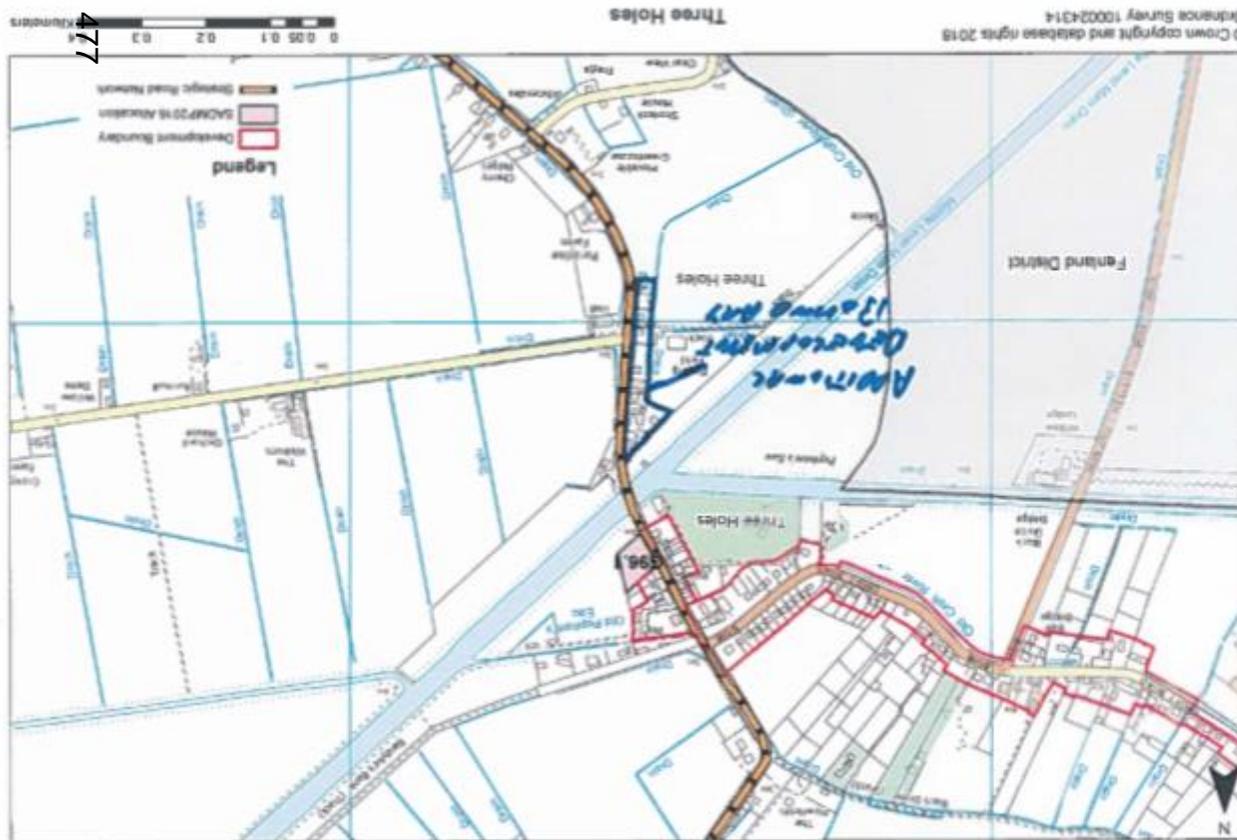
Whilst all comments and suggestions are welcome, areas which are in the process of a neighbourhood plan and have already gone through the designation stage, will not be considered for amendment due to this has been left in the hands of the qualifying body; who has already decided the development boundary for their neighbourhood.

Numerous comments related to similar points on making development boundaries consistent and as up to date as possible, by including development which is now existing in the built up areas, under development and extant permissions 'yet' to be built out but will be within this plan period to provide the most up to date boundaries. Proposed changes fell under a variety of sections

within the settlement hierarchy including: King's Lynn & the surrounding area, Main Towns, KRSCS, Rural Villages and Smaller Villages and Hamlets.

A large amount of comments received also made suggestions on the development boundary in reference to HELAA allocations. Comments have also been taken on board for reviewing development boundaries for each settlement through an up to date consideration of aerial photos and site visits. Including reviewing school sites as highlighted by NCC.

As shown in the table below there were 27 settlements which comments on development boundary changes referred to.



Barroway Drove	Burnham Market	Clenchwarton	Congham	Denver
Downham Market	Emneth	Fincham	Gayton Thorpe	Hilgay
Marshland St James	North Runcton	Runcton Holme	Shouldham	Southery
Stoke Ferry	Stow Bridge	Terrington St Clement	Terrington St John	Three Holes
Titchwell	Upwell/Outwell	Walpole Highway	Walpole St Peter/ Walpole St Andrew/Walpole Marsh	West Lynn
West Walton	Wiggenhall St Mary Magdalen			

Settlement	Commentary on proposed development boundary change	Officer comments
<u>Barroway Drove</u>	<ul style="list-style-type: none"> • Duplicate comments by several individuals (Ian Cable, Mr R Garner, Mrs A Garner, Mr N Good, Mr & Mrs Blakemore, Mr & Mrs Johnson, Mr A Golding, Mr & Mrs J Clarke, Wotton Brothers) commented for: <i>“the development boundary [to] be extended to include developed areas of The Drove/Cuckoo Road, which forms an intrinsic part of the village, which compromises of and is characterised by ribbon development. As shown below. This would be consistent with other proposed village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.”</i> 	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside.</p> <p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of</p>

		<p>development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development in rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p> <p>After analysing the development boundary for Barroway Drove the proposed change is considered to be too far out and somewhat detached from the current development boundary. We don't want to encourage the expansion of development boundaries to a huge degree or where it is not entirely necessary. This change therefore will not take place.</p>
<p><u>Burnham Market</u></p>	<ul style="list-style-type: none"> • David de Stacpoole: <i>"I refer you to my letter with several attachments of 7th November 2016 in respect of Call for Sites and Policy Suggestions. The position is that I wanted to be within the development boundary (DB) of Burnham Market, or as a site allocation for residential development. Its my understanding now that its been recently assessed as a 'reasonable alternative,' but is not going to be included within the DB. In which case I would like to take this opportunity to offer further information to support, primarily, the inclusion and ask for a reassessment within the time line on the</i> 	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>

grounds of: It is not easy for me, or others I have spoken to, to understand why the House that is The Rectory for the village church called St Mary's (c 4 mins walk away) cannot be seen as being in the DB? (By implication is the Council now saying that I don't live in Burnham Market, if I am not in the DB?) Also there is a bungalow house at the end of our drive on Stanhoe road (B1155) which is parallel and backs onto to my woodland? How can that therefore be in the DB and my land not? See map attached map.

How it could ever be recorded as Grade 4 agricultural land? It is only just over c 3.5 acres of which a good portion is woodland, the rest is paddock(s) and garden. (Grade 4: - poor quality agricultural land Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.) The land that has been developed into several houses on our Eastern boundary, (before our time) some years ago, belonged wholly to the Rectory and was presumably in the DB, but somehow the rest was excluded? (This is possibly why the Grade 4 bit/notation has not been updated?) It's my view that now is the perfect opportunity for the Council to put this anomaly right and include Westgate Old Rectory in the DB. I am quite certain that if anyone actually visited they would immediately see how the Rectory has to logically be in the new DB? For ease of reference there were several attachments & maps sent to you which was the representation form dated 23/2/15 with suggested boundary marked in an aerial photograph? (This was actually the second time presented, the first time being in 2005.)"

<p><u>Clenchwarton</u></p>	<ul style="list-style-type: none"> • Jemma Curtis commented; <i>“object to the line of the development boundary and request that it is amended to include the northern part of Station road to reflect the previous development boundary for the village in the 1998 Local plan. We feel this part of the village should form part of the boundary because a significant proportion of the village live in this western side. Station Road itself is a primary road into the village capable of supporting further development in this area. It is well connected with footpaths to the Main Road into the village to access the village centre (school, shop, playing field). The route is served by bus stops to access key centres including King's Lynn making this a sustainable location for further development.”</i> • Clenchwarton Parish Council commented: <i>“Could you also explain why the new development boundary for Clenchwarton has been draw further to the east which the Environment Agency flood risk maps show to be a higher flood risk area than the west end of the parish”</i> <p>A few comments also rejected the line of the development boundary as it relates to land to the south of Black Horse Road and instead requested it was amended to incorporate land identified in a variety of promoted HELAA sites (H043, H044, H050, H053)</p>	<p>The development boundary in Clenchwarton was changed for good reason from the previous boundary in the 1998 Local plan.</p> <p>Analysing the comments, it has been decided that there will be no DB change.</p> <p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>
<p>Congham</p>	<ul style="list-style-type: none"> • Congham Parish Council <i>“The Local Plan review identifies a number of changes to the Congham development boundary which has been extended on the west of St Andrews Lane to the junction with Broadgate Lane, in contradiction of a planning application which was refused in 17/00812/F. west of Deerwood. The boundary has also been modified in the Little Congham settlement complex adjacent to the B1153. There has already been significant development in this small rural village in the last three years which further exacerbates transport movements along this very narrow St Andrews Lane. Vehicles can only</i> 	<p>Analysing the comments and proposals made here, we agree with the suggestions made and will update the map and development boundary accordingly.</p>

move in single file, using gateways and 3 passing places; agricultural machinery movements along this very narrow lane have already caused damage to property as it passes through the centre of the village near the Anvil and has cut away the banks along the side of the lane bringing soil onto the lane. This village has been designated open countryside and previous planning applications have been built in open countryside rather than in infill locations. The Parish Council therefore expects the boundary to be taken back to the edge of the bungalow Deerwood. The map of the Congham settlement does not include the development boundary along Low Rd and it therefore appears to be in the Key centre of Grimston; this is not the case, as the north side of Low rd is in the parish of Congham and all residents in Low Rd Congham wish to remain on the edge of open countryside. The Parish Council would respect the residents of view on Low Rd and object to any development at HO63, currently designated as greenfield, and as it is in Congham village - open countryside.” Suggested modification was to reduce the DB to the west of St Andrews Lane

- **Cllr Tim Tilbrook:** *“supports Congham PC removal of cricket ground no development amendment of village boundary- point 2 fully support the Congham Parish council view that the extension of the village plan to the west along St Andrews is wrong. The boundary should end after the three new houses built when the council had lost its land supply appeal and the old bungalow to the east of these. The road is totally unsuitable for more development. The village would be stretched even further. Again the neighbourhood plan would be unlikely to support development but might come too late. Both the council planning department and parish council have fought an application here and appeal recently. The same reasons for objecting to it remain.”*
- **Mr Andrew Page-** *“The Congham map indicates the development boundary extending to the west of the property Deerwood up to*

	<p><i>Broadgate Lane but this land was considered to be in open countryside reference planning refusal 17/00812/F which was upheld at appeal. Any further linear development along St Andrews Lane will further destroy the original spatial development pattern which pre-existed prior to the damage policy DM3 has inflicted on this rural hamlet. Policy DM3 is unsuitable for most small villages and rural hamlets.</i></p> <p>Modification <i>The boundary should be amended to the stop on the western boundary of Deerwood with 33 & 34 St Andrews Lane being in open countryside consistent with 12,13 and Bramble Cottage on St Andrews Lane”</i></p>	
<u>Denver</u>	<ul style="list-style-type: none"> • Richard Smith NCC NPS Group commented: “The proposed development boundary as presently drawn cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.” • Mr N Good and Mr R Garner & Mrs A Garner commented: “The development boundary should be extended along Sluice Road to include existing dwellings on the south side to a similar point to those included on the north side of the road, to reflect the existing built environment.” 	<p>Analysing the proposed change by Richard Smith, we have taken this on board and will change the development boundary to go around the existing school buildings.</p> <p>Analysing the proposal put forward for Sluice Road, this change will not take place. However, development could potentially come forward on sites if it fulfils the criteria in LP26.</p>
<u>Downham Market</u>	<ul style="list-style-type: none"> • Mr N Darby- “Employment allocations F1.2 as shown on plan are considered insufficient for the plan period. A considerable proportion of land allocation F1.2 has either been developed or has not come 	<p>Employment land is not necessary or needed within the borough for this</p>

	<p><i>forward for development. As such, opportunities for new commercial development is limited and constrained both in size and choice. This may discourage new employers from coming to the town. In order to provide opportunities for the period of the plan and beyond, (potential employers may be looking to ensure there is scope for expansion in their longer term plans and aspirations) additional land allocation should be provided, without detriment to the surroundings. Land is available for allocation and development immediately south of F1.2, as shown on plan below. Being bounded on two sides by existing employment land and to the east by the main rail line, the land provides a natural opportunity for extension of the St Johns Business Park, without the need for extensive new infrastructure, highway works or without significant intrusion into the countryside. This will provide further opportunity to attract employment and demonstrate that the Town is open to new employment opportunities. It is considered the site, close to the main line rail link will provide opportunity for blue chip companies wanting to be close to Cambridge to benefit from a wider workforce and lower land values both for development and their employees”.</i></p>	<p>plan period. If proposals were to come ahead which were adjacent DB then policy LP26 allows flexibility for sites to come forward as long as they fulfil the criteria of the policy approach.</p>
<p><u>Emneth</u></p>	<p>Numerous comments were submitted on extending the development boundary in Emneth as set out below; particularly with reference to HELAA sites made by Peter Humphrey (H100, H111 H118, H119, H127).</p> <ul style="list-style-type: none"> • Mrs A Cox commented: - <i>“The development boundary should be extended along the north side of Church Road to include existing dwellings on the north side”</i> • Peter Humphrey- <i>“Land at Fairview nurseries Emneth. My client is generally supportive of the development strategy for Emneth reflecting</i> 	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to</p>

	<p><i>the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H119. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation and that it could deliver a significant amount of development as well as wider community benefits. The HELAA acknowledges the visual and environmental benefits of the redevelopment proposed compared with the previous use as intensive commercial nurseries. It is noted that concern was raised in respect to potential impact on heritage assets to the north- however the HELAA confirmed that this could be adequately mitigated- certainly the existing glasshouse development has an adverse impact and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and on the main bus route to Wisbech that could deliver up to 180 homes as well as open space and other community benefits to the village. The site is large enough to be developed in phases to enable landscaping to mature.”</i></p> <ul style="list-style-type: none"> • Peter Humphrey – <i>“We do object to the line of the development boundary as it relates to and excludes land to the at Fairview Nurseries Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H118. The site is available and deliverable and in accordance it the</i> 	<p>limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p> <p>Analysing the comments, it has been decided that there will be no DB change.</p> <p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>In reference to the school, the DB will not be change here. If extensions were proposed this can fall under LP26 and LP33 policy within the plan in relation the existing school site.</p>
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search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on heritage assets to the north however the HELAA confirmed that this could be adequately mitigated- and a redevelopment of the site with appropriate open space and screening along the northern boundary would offer a positive benefit to the setting of Oxburgh Hall. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site within the village and on the main bus route to Wisbech that could deliver up to 5 homes.”

- **Peter Humphrey-** *“It is considered that the development boundary as applied to Lady’s drove Emneth does not reflect the linear form of development that occurs beyond the DAB - particularly on the eastern side of Lady’s Drove. Beyond the site identified within this submission there are 4 plots which have planning permission ref 16/00149/F and in 2018 the necessary conditions were discharged indicating that there is every intention of a commencement. The officers ctte report in relation to the application (16/00149/F) noted that the proposal was in keeping with the prevailing form and character and is in FZ1. It is therefore clear that the development of this site would also be acceptable in character and impact terms. Given the comments above and the implementation of the permission it seems logical that the site identified below be incorporated in to a revised DAB for Emneth recognising the recent change in circumstance and extension to the village along Lady’s Drove.”*
- **Peter Humphrey-** *“Land south of Elm High Road Emneth My client is generally supportive of the development strategy for Emneth reflecting*

the strong range of local services and facilities within the village and its proximity to Wisbech, enabling new development to come forward. We do object to the line of the development boundary as it relates to land to the south and west of Elm High Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H100. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 25 homes as well as open space and other community benefits to the village. The HELAA acknowledges that this site is close to the village centre and on the bus route it is in FZ1 and concludes that 'No constraints have been identified which would inhibit the site coming forward'

- **Peter Humphrey** – *“We do object to the line of the development boundary as it relates to land to the north of Church Road Emneth and request that it is amended to incorporate land identified on the attached map as a housing allocation as set out in the HELAA H127. The site is available and deliverable and in accordance it the search criteria set out in the HELAA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable an available for allocation. It is noted that concern was raised in respect to potential impact on the listed dovecote to the rear of no 30 Church Road, however it is accepted in the HELAA that this can be addressed and it is argued that the redevelopment of the site offers a practical way in which the setting of this building can be given some context – as, as it stands it bears little relationship to surrounding modern development and the development may be able to fund the*

long term retention and care of the building as well as creating a suit. Overall the HELAA concluded that there were no overriding issues with the site that could not be mitigated and as such it is considered that it is clearly a suitable and available site close to the village centre that could deliver up to 70 homes as well as open space and other community benefits to the village setting.”

- Peter Humphrey-** *“The demarcation of the development boundary as applied to several settlement – but particularly in this instance to Emneth is considered to be incorrect as it does not reflect the residential / commercial built form of the current village. In particular existing residential properties / and commercial developments are excluded and as such theoretically countryside policies of restraint should apply to these residential properties that are manifestly within the built form of the village and form part of its built character. In particular in relation to Emneth site H111 a residential property was assessed and found suitable to accommodate residential development in its curtilage however it is excluded from the development boundary, which is an unjustified omission. Likewise, the adjacent residential property Hagbeach Hall has been excluded from the village dev boundary when it is a frontage plot one of the main streets in the village. Beyond this the poplar nurseries site is clearly an established built form within the built form of the village (see aerial photo). It appears that the development boundaries have been largely derived from the 1998 local plan development boundaries and plan extracts utilising the built environment type ‘d’ only. This being the case areas acknowledged as being within the development boundaries of villages in 1998 are now excluded but virtue of the age or character of the residential and commercial development that they contain. The purpose of the development boundary is to differentiate the built form of the village from the open countryside beyond to establish a clear application of policy. In this case sites within villages would be subject*

	<p><i>to countryside policies of restraint which is non sensical. Beyond the concerns expressed above and as set out in a further generalised objection to the application of development area boundaries without a thorough analysis a site specific objection is raise in respect to the non inclusion of the proposed site at Poplar nurseries on Church Road within the development boundary as it clearly relates to the built form of the village rather than the countryside. As both H111 and H127 are identified as reasonable alternatives with the HELAA sustainability assessment it is clear that the site is both suitable and deliverable. Having regard to the listed building at Hagbeach Hall it is considered that the frontage of the site could be open space to give improved setting to the hall and the gatepost (listed) with a developable area of 0.8 Ha. The benefits would be improved setting to the listed building – possibly a play area or park on the site frontage, removal of busy commercial nursery from the core of the village with resultant decrease in traffic and disturbance. Modification Amend the development boundary for Emneth to incorporate land which clearly forms part of the ‘urban’/ built form of the village as opposed to the countryside beyond. In particular include Poplar Nurseries with the development boundary to reflect its clear relationship the village built form. Beyond the matter of the development boundary it is requested that the site be allocated for up to 15 dwellings.”</i></p> <ul style="list-style-type: none"> • Richard Smith NCC NPS Group- <i>“The school site is enclosed on three sides by existing development. To allow for possible future school expansion, it would be logical for the proposed development boundary to be extended in line with the boundary of the housing development (The Lovells) to the north or Hollycroft Close to the south”</i> 	
<u>Flncham</u>	<ul style="list-style-type: none"> • Dr A Jones – <i>“The development boundary should be extended along the Main road to the east to include existing dwellings on the south side, including existing dwelling and proposed dwellings with extant</i> 	In reference to development boundaries as a whole, we

	<p><i>planning permission, to reflect the existing built environment.”</i></p>	<p>understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p> <p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development in rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p> <p>Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.</p>
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<u>Gayton Thorpe</u>	<ul style="list-style-type: none"> • Mrs Sarah Bristow- <i>“We recognise that, as part of the Neighbourhood Plan, the community has the opportunity to (re)define the development boundary of Gayton Thorpe. Nevertheless, the NP is currently not ‘made’ and so the following comments apply until it is. The idea of development boundaries in Gayton Thorpe is a new one. Previously, the policy has been along the lines of ‘modest levels of development to support the needs of the community’. Introducing development boundaries along with policy LP25 and LP26 (although we suggest elsewhere that LP26 is deleted) means that a development boundary is a bit like a magnet – the development boundary is expected to grow. I.e. new development is expected to start against an existing development boundary. Comments - Why aren’t all the groupings of buildings in GT surrounded by a development boundary? for example, Great Barn Farm and its cottages which doesn’t have a development boundary? - Development Boundaries seem to be a contradiction in terms if they can be (re)moved to suit borough requirements without consideration of a consultation with village residents.”</i> 	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>
<u>Hilgay</u>	<ul style="list-style-type: none"> • Richard Smith NCC NPS Group – <i>“The proposed development boundary is drawn too tightly around the existing school site and does not therefore allow for any possible future expansion. The boundary should therefore be amended to reflect this”</i> 	<p>DB will not change here. If extensions were proposed this can fall under LP26 and LP33 policy within the plan in relation the existing school site.</p>
<u>Marshland St James</u>	<ul style="list-style-type: none"> • Richard Smith NCC NPS Group – <i>“The school adjoins existing development and has a proposed housing allocation to the south east although is defined as being outside the proposed development boundary. The boundary should be amended to include the whole of the site to recognise its established use and possible future expansion”</i> 	<p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>
<u>North Runcton</u>	<ul style="list-style-type: none"> • Mr T Richardson – <i>“It is considered that the development boundary as</i> 	

	<p><i>applied to North Runcton does not reflect the extent to the village development- as opposed to the agricultural and common land that lies beyond. The site at Common Lane forms part of a former garden and has no functional relationship to the Common to the west or the fields to the south; it is therefore considered to be part of the village and consideration of aerial photos going back 20 years confirm that it has been garden for a significant period. The site has no alternative use - having been separated from the main house following its redevelopment and it would represent a sensible rounding off of the village form in this instance.</i></p> <p><i>The proposed inclusion of the site within the development boundary for North Runcton would not create a precedent as the circumstances of the site and its relationship to the open countryside beyond are very particular. Modification - That the land edged red on the attached plan (45 Common Lane, North Runcton) be included within the development boundary for the village of North Runcton.”</i></p> <ul style="list-style-type: none"> • Mrs Rachel Curtis North Runcton Parish Council – <i>“We note the reintroduction of a village development boundary. We are not quite clear about the significance of this in respect of it replacing the current SADMP policy DM3. We note that the Hardwick ward is not illustrated in the description of North Runcton – although you may consider it is covered under West Winch Policy E2.1/E2.2.”</i> 	<p>Analysing the development boundary here we propose no change.</p> <p>Note the comment made by the PC.</p>
<p><u>Runcton Holme</u></p>	<ul style="list-style-type: none"> • Mr & Mrs J Clarke commented <i>“The development boundary should be extended along School Road to the east to include existing dwellings on the south side, including existing holiday park, social centre and allocated site with extant planning permission and school to the north side. This representing the ‘hub’ of the village”</i> • Mr J Sandals commented: <i>“We do object to the line of the</i> 	<p>In reference to development boundaries as a whole, we understand and acknowledge that there is indeed developed areas and existing dwellings that fall outside of development boundaries within the</p>

	<p><i>development boundary as it relates to land to the north of Jubilee Rise, Runcton Holme and request that it is amended to incorporate all or part of the land identified in the HELAA as H292. The land is no longer in agricultural use and clearly form part of the village form rather than that of the agricultural landscape beyond. The site is available and deliverable and in accordance it the search criteria set out in the HEELA and as such it becomes a judgement in relation to wider suitability and delivery aims; it is considered that this it is suitable and available for allocation. The HELAA does not identify any significant constraints to development that cannot be mitigated, the site is well related to the village core with the services and facilities therein. It concludes that; No constraints which we impede development have been identified. Therefore, the site can be considered to contribute towards the dwelling capacity of the borough. In many ways the application of a generic density within the HELAA is not particularly helpful to village sites as the character and surroundings of sites vary significantly between villages and indeed between sites in the same village. The landowner is mindful of the character of the surrounding development and the housing needs of the village and as such is prepared to reduce the number of homes to be allocated to 8- 10 and these could come forward as self-build properties to meet the identified need for these as set out in Local and National policy - and it is likely that these would be built at significantly lower densities to the assumptions made in the HELAA. It is noted that this level of development would not require all of the site and we are happy to discuss the subdivision of the site with officers as appropriate. The use of the site for a lower number of plots would enable layout to avoid the FZ3 identified in the HELAA assessment as well as provide a softer edge to the village and have development of a scale and density appropriate to this location. t is also possible that the site could incorporate some starter homes as now required by Government guidance to address the needs of first-time buyers in the village.</i></p>	<p>borough. Generally, development boundaries are imposed to recognise the built-up growth in different settlements. Boundaries are drawn to limit and control development which falls outside of boundaries that are considered to be in the countryside. They are there to control and stop unnecessary need of sporadic spots of development.</p> <p>LP26 is a policy which is introduced in the Local Plan to provide a flexible framework for more modest levels of development growth which are of an appropriate character and reasonably related to existing settlements. This is so small-scale development which reflects local needs and promotes sustainable development n rural areas can particularly grow and thrive in a sensitive manner outside of development boundaries.</p> <p>Analysing this DB, there will be no change. However, sites that accord and meet the criteria of LP26 could come forward outside of the DB.</p> <p>In reference to the HELAA comment, sites</p>
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	<i>Amend dev boundary to include all or part of the site identified in the HELAA as H292 land north of Jubilee Rise at Runcton Holme as housing allocation for self-build properties.”</i>	
<u>Shouldham</u>	<ul style="list-style-type: none"> • Richard Smith NCC NPS Group- <i>“The boundary as proposed is illogical in that it includes the access but excludes the existing school site and the majority of its hardstanding. The boundary should therefore be amended to recognise its established use and allow for possible future expansion.”</i> 	Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.
<u>Southery</u>	<ul style="list-style-type: none"> • Roger and Joyne Burton: <i>“This representation requests that site H334 (9 Upgate Street / 1 Lynn Road, Southery) be included in the allocation for the village of Southery. Please assume for assessment purposes that the existing planning permission for the site will expire (July 2019) prior to development taking place & the new local plan review being completed. Please take the following additional points in to account as part of your assessment:</i> <ol style="list-style-type: none"> <i>1. the principle of planning permission has been established on the site (16/00064/OM);</i> <i>2. re-use of brownfield land (part of the site);</i> <i>3. central to the village amenities / services;</i> <i>4. would have limited landscape impact as the site is already surrounded by residential development to the West, South and part to the East;</i> <i>5. would be a logical extension of the existing settlement boundary;</i> <i>6. infill development completing the street scene and in keeping with a rural village;</i> <i>7. level site with no significant development constraints; and</i> <i>8. the site is deliverable within the plan period.</i> <i>In any event, the development boundary of Southery should be extended to include the existing</i> 	<p>If the site already has planning permission and is capable of being delivered then it should be, it doesn't need to be allocated. Once the development has completed it could be considered for inclusion within the development boundary. There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). The HELAA shows that the site cannot be delivered as the required visibility splays cannot be achieved, so the site is in fact undeliverable so cannot be allocated.</p> <p>There is also no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN).</p>

	<p><i>residential buildings and other buildings on the site. The existing boundary is currently inconsistent and restrictive.”</i></p> <ul style="list-style-type: none"> • Mrs Annette Osler: <i>“Amend the allocation for new housing in Southery to incorporate all of H332 so that this can come forward in the latter part of the plan period to deliver the new housing necessary to maintain the vitality and viability of the village. Ultimately the development boundary should also be amended to incorporate all of the land within H332”</i> 	<p>Therefore, DB change will not be taken forward.</p>
<p><u>Stoke Ferry</u></p>	<ul style="list-style-type: none"> • Mr J Kirchen- <i>“The development boundary should be extended south of Wretton Road to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.”</i> • AMBER REI Ltd commented- <i>“2.22 On the Stoke Ferry Allocations Plan (page 391) it is clear that the Development Boundary has not been amended compared to the SADPMP. The Development Boundary should be amended to include allocation G88.3 as this has consent and is currently under construction. It therefore makes no logical sense in planning terms why this site would remain outside of the Development Boundary and be considered in planning terms to form part of the open countryside. 2.23 The Development Boundary should also be amended to include the existing storage facility on Furlong Drove (Site Location Plan included at Appendix 2). This a brownfield site which has been utilised for storing the grain from the associated mill at the heart of the village. As the site is previously developed land and continues to accommodate the storage building it is clear that this forms part of the settlement rather than the surrounding countryside and the Development Boundary should be amended to reflect this. 2.24 The small area of greenfield land</i> 	<p>This settlement is in the process of doing a neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>

	<p><i>adjacent to the existing Mill should also be included with the Development Boundary (please refer to Appendix 3 for Site Location Plan). This is associated with the existing Mill, which is in the Development Boundary, and is under the same ownership. The land is not accessible to the public and serves no recreation or amenity purpose. The site is entirely land-locked within the settlement and cannot be considered to form part of the open countryside. It is therefore inappropriate for this land to be excluded from the development boundary. It has also been confirmed as part of the live planning application which covers both this site and the Mill, that the field does not contribute to the Conversation Area and has no heritage significance. Modification - As this site is clearly associated with the Mill and is entirely landlocked within the settlement meaning it cannot be considered to form part of the open countryside the Development Boundary should be amended to include this area of land.”</i></p>	
<u>Stow Bridge</u>	<ul style="list-style-type: none"> • Mr D Russell commented- <i>“The development boundary should be extended to include existing development including residential dwellings to the north and south sides of West Head Road.”</i> 	<p>After analysing the development boundary, we agree with the proposed recommendation and will make the change.</p>
<u>Terrington St Clement</u>	<ul style="list-style-type: none"> • Peter Humphrey commented- <i>“Development boundary and allocation in respect to Terrington St. Clement. Add the Kerkham Close site as a new allocation Terrington St Clement, it is sustainable and deliverable and could come forward immediately or at another point within the development plan timeframe”</i> 	<p>This proposal will not be included within the DB. The site was put forward and was deemed to be a non-preferred option. There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed</p>

		HELAA allocations.
<p><u>Terrington St John</u></p>	<ul style="list-style-type: none"> Peter Humphrey commented in reference to H378 and the DB <p><i>“The site is well related to the core of the village and the services and facilities it contains, with a walk of only 250m to the junction with Main Road. The site was put forward as a planning application in 2016 and was rejected solely as development outside of the development boundary- in all other respects the officer’s report (16/00316/OM) concluded that the site was both suitable and available for development. Likewise, within the HELAA it is concluded that the development would not be harmful, would be compatible with surrounding uses and it concludes that the site ‘appears suitable’.</i></p> <p><i>It is contended that the site would not deliver the 25 homes as set out in the HELAA as this would involve development in depth away from the highway which may be out of character to the area.</i></p> <p><i>A development of 10 plot a set out in the planning application indicative layout is considered to be more appropriate having regard to the built character of the immediate area- to this extent the application of bald net densities on new development site is not considered to be always appropriate. Furthermore, it is contended that the site is better related and more sustainable than the site suggested as the new allocations for the village as it is closer to the village core and the bus route on Main Road and St Johns Road. Modification Add the submission site on New Road (H378) as an allocation (for up to 10 plots) towards the housing numbers required for Terrington St John to maintain the viability of the village and its services.”</i></p> <p><i>“The form of the village in relation to School Road is of a linear form of development on one or both sides and this is reflected throughout the village and indeed also within Tilney St Lawrence. The site is part of a land associated with East ridge and Isar Villa (as shown on the aerial photo in the attached document. It is clear that the site forms part of the village</i></p> 	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>

	<p><i>development as opposed to the rural agricultural land to the west and south. It does not have nor will ever have any further agricultural use and such it is sensible and pragmatic to incorporate it into the development boundary of the village. Consideration of historic aerial photos show the site as being out of agricultural use for at least 20 years. It is therefore requested that the development boundary be extended to incorporate the site as a logical rounding off for the development on School Road.</i></p>	
<u>Three Holes</u>	<ul style="list-style-type: none"> • Mr J Maxey Commented- <i>“It is noted that a significant part of the built footprint of the village is excluded from the development boundary ie the area south of the Middle Level Main drain on the western site. This area is almost continuously developed, and it is suggested that the development boundary designation should reflect this as shown on the attached plan coloured in blue. There also needs to be a clearer statement as to whether Three Holes is considered as part of the Upwell / Outwell KRSC area. there is reference to being part oif the same parish and proposed neighbourhood plan and the development boundaries adjoin.”</i> 	<p>This settlement falls under the parish of Upwell which is currently in the examination stage of their neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>
<u>Titchwell</u>	<ul style="list-style-type: none"> • Parkers of Leicester Ltd <i>“We write to object to the proposed development boundary at the village of Titchwell on the south side at Manor Farm. We have enclosed a plan that shows the proposed village boundary as shown in the Draft Local Plan (in red) and our suggested new boundary line (in blue). The boundary, as proposed, does not appear to have any relationship to the use or character of the land today. The proposed boundary line cuts through the existing yard and includes one of the existing (now redundant) farm buildings but excludes the others. The boundary includes the hardstanding but appears to exclude the access lane and much of the remaining hardstanding. There does not therefore, appear to be any clear logic to the boundary as shown. We consider that the boundary should logically be drawn around the</i> 	<p>After analysing this proposal this change will not go ahead. It appears that the area shows to be agricultural/barn operations.</p>

	<p><i>whole parcel, to enclose the existing built area, including the former farm buildings. This, then represents the extent of the development boundary as the parcel is contiguous to the development within the village. As the land is developed, there is no possibility of it being returned to agricultural use, and the buildings have no long term potential use for farming operations. As the buildings are now redundant, inclusion within the Development Boundary would allow new compatible uses to be found for the site and buildings.”</i></p>	
<p><u>Upwell/Outwell</u></p>	<ul style="list-style-type: none"> • Peter Humphrey made comment on a number of HELAA sites including H403, H413, H414 <p><i>“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H413 to rear of 60 St Peters Road. It is considered that the site is encompassed within the built form of the village with urban development of 3 sides. It is particularly pertinent to note the development of the site to the north – known as Orchard Gardens (outline granted in 2016 under ref 15/01496/OM). It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable’ Modification- Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site within the built form of</i></p>	<p>This settlement is in the examination stage of their neighbourhood plan. We believe that the decision ought to with the qualifying body who is undertaking the plan to consider development boundary changes within their settlement.</p>

the village. Include the site as an allocation for housing within the plan- it is suitable and available and the HELAA H413 identified no significant constraints to development. It is previously developed land giving an added presumption in favour of development.”

“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H403 to at Pius Drove. It is considered that the site is encompassed within the built form of the village with urban development of 3 sides. It is clear that the site relates to the form of the village rather than the open countryside to the south and as such should be incorporated into the village development boundary as it is the purpose of the development boundary to identify the edge of the settlement and countryside so that appropriate policies can be applied. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable. Amend the development boundary to reflect the actual built form of the village and its boundary with the open countryside which will include the site (H403) within the built form of the village.”

“My client is generally supportive of the development strategy for Upwell and Outwell reflecting the strong range of local services and facilities within the villages and their proximity to higher order services and facilities in Wisbech, enabling sustainable new development to come forward. We do however object to the designation of the development boundary for the settlements in that it excludes the site promoted under H414 at Pius Drove. The site is promoted in conjunction with (and as an extension to) HELAA site 403 which provides access to Pius Drove and the core of the village It is considered that the site provides a logical extension to the village through site 403 and that it

	<p>could come forward within the latter part of the plan period. The site was put forward in the HELAA and no significant constraints to development were found- the assessment concluded that – ‘Based on the current evidence the site appears suitable’</p>	
<p><u>Walpole Highway</u></p>	<ul style="list-style-type: none"> • Peter Humphrey commented: “The site lies adjacent to the recently approved and constructed site on Hall Road, it is considered that the inclusion of the site as a rounding off of the development boundary would be a logical step in respect to the form of the village. Amend the development boundary to Walpole Highway to include the site identified as a rounding off.” 	<p>This change will not take place due to the inclusion appears to be of one dwelling.</p>
<p><u>Walpole St Peter/Walpole St Andrew/Walpole Marsh</u></p>	<ul style="list-style-type: none"> • Mr R Cousins- “The development boundary should be extended along Chalk Road to the west to include dwellings which have the benefit of extant planning permissions, as shown below. Consistent with other village boundaries such as Boughton, where recent and approved development have been included within the proposed development boundary.” • Cllr Richard Blunt commented- “The development boundary for Walpole St. Andrew / Walpole St. Peter could logically be extended to include the relatively small portion of Chalk Road, which currently lies outside of the development boundary. Historically this area may have been excluded to provide a degree of separation between the two villages. Today however, the two villages are fairly well joined together, and this could be acknowledged further, particularly as the Local Plan review itself considers the villages to be a Joint Key Rural Service Centre.” • Mr S Harris commented- “Land South of the Police House, West Drove, Walpole St Peter PE14 7H Hela Ref H443 & Call for sites ref: 25-11-20161781. Amend boundary for the village to include site 	<p>DB will not be changed in reference to extension along Chalk Road there is no justification for this.</p> <p>No change.</p> <p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>

	<p><i>already built out and also incorporate an associated infill site. Attached Planning report summary “The site shown in this report mostly has permission for development. It is requested that it be included in a revised development boundary.”</i></p> <ul style="list-style-type: none"> • Richard Smith NCC NPS Group commented- <i>“The development boundary as proposed does not reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and playing fields to allow for possible future expansion.”</i> 	
<u>West Lynn</u>	<ul style="list-style-type: none"> • Mr David Goddard- <i>“Amend development boundary for West Lynn to include all or part of the site identified in the HELAA as H481 land at 54 Clenchwarton Road West Lynn as housing allocation for affordable and starter home properties.”</i> 	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p>
<u>West Walton</u>	<ul style="list-style-type: none"> • Mr J Maxey- <i>“West Walton is a KRSC. The heart of the village is centred around the Church. Flood risk is a constraint generally in the village but there is an area at Church Farm, surrounded on 3 sides by the Development Boundary that has been demonstrated via planning application 16/01475/O to be within an area that is unlikely to be affected by flood. The application was refused as premature the SAMDP having just been adopted, but now is the appropriate time to reconsider this site. Although a suitable size for about 4 dwellings and thus below the scale for allocation, the site is suitable for development, and would round of the built area of the village in its vicinity. It is proposed that the Development Boundary is amended to include the area coloured blue on the attached plan to take account of this potential, so that it can be considered in the light of policies for</i> 	<p>There is no current need to allocate further sites through the Local Plan review to meet the Local Housing Need (LHN). Therefore, DB will not be changed to reflect proposed HELAA allocations.</p> <p>When development has been built out then inclusion of such settlements may be included in the development boundary.</p>

	<p><i>development within the village, which it undoubtedly is, as opposed to policies for outside the village and in open countryside”</i></p> <ul style="list-style-type: none"> • Richard Smith NCC NPS Group- <i>“The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion.”</i> 	<p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>
<p><u>Wiggenhall St Mary Magdalen</u></p>	<ul style="list-style-type: none"> • Richard Smith NCC NPS Group – <i>“The development boundary as proposed cuts through the middle of the existing school site/buildings and does not therefore reflect existing on-site features. The boundary should be revised to include all the existing school buildings/hardstanding and allow for possible future expansion”</i> 	<p>Analysing the proposed change, we have taken this on board and will change the development boundary to go around the existing school buildings.</p>