

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>

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.		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

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				two years.
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 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.	See box to the left	The NCC Minerals and Waste Plan is a part of the Local Development Plan and therefore will need to be adhered to. The 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	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	Please state the current CIL arrangement with Albanwise in the interests of transparency.	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

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Kelvin Loveday		<p>which would of course benefit the local community.</p> <p>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. 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>The population of Downham Market has grown disproportionately in 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>The 2011 Census is currently the most recent one. The latest population figures which go down to this level are the ONS 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/</p> <p>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>

Consideration of Issues / Conclusion:

- 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.

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.

Policy Recommendation:

- **Leave the Policy as is**
- **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 2017 mid-year estimates provide 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