



Planning Committee
Thursday, 15th April, 2021 at 9.30 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. **Receipt of Late Correspondence on Applications** (Pages 2 - 10)

To receive the Schedule of Late Correspondence received since the publication of the agenda.

Contact

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**SUMMARY OF ADDITIONAL CORRESPONDENCE RECEIVED SINCE THE
PUBLICATION OF THE AGENDA AND ERRATA**

Item No. 7/1 **Page No.** 6

Third Party: 9 additional letters of OBJECTION have been received from 5 individuals which can be summarised as follows:

- Is it fair to create a new route of "Strategic importance" through a residential estate? The route takes drivers close to one school and passed the gates of two more schools bringing danger, noise and toxic fumes. "Journey time analysis using Google maps suggested that travelling through the new development using the new bridge over the railway would be quicker than travelling via the A148 and the A1076"(Mott MacDonald Air Assessment, Jan 2021). This makes it an attractive shortcut for people who live in Lynn and want to get to the Hardwick, A149.A47 or A10: and when the A149 is gridlocked, Sat Navs would divert drivers through the estate. Evidence that Highways are concerned is their request that usage at the bridge is monitored and if required control measures such as peak hour bus gates with automatic enforcement are used.
- The 964 parking places of the new development will add to the flow of traffic. More vehicles will inevitably go through the Gaywood Clock AQMA, which has been declared for exceedance of the annual mean objective for NO2. The council's environment quality team predicts a moderate adverse impact on NO2 concentrations at one receptor and slight adverse impacts predicted at seven receptors. Away from the estate, increase in annual mean NO2 pollutant is predicted at receptor 4 (London Road 1) - receptor 8(London Road 4). Mott Macdonald consider this to be 'not significant'. Many believe that any increases should be avoided because of adverse health effects.
- Land to be purchased off site several miles from Gaywood will be of no benefit to residents. The Officer's Report suggests that design features of the development will help to reduce need for (new) residents to travel to other sites but will be of no benefit to existing residents.
- The claim that 3 trees will be planted for each one felled is misleading. The trees planted will be whips (trees with no branches) - it will be 20 or 30 years before they perform ecological functions of protection against localised flooding, carbon capture and shelter for wildlife. Removal of the mosaic of habitats makes the whole town more vulnerable. The large established reed-bed, home to so much biodiversity will be destroyed, releasing its stored carbon into the atmosphere. How does the council/developer plan to contain this release?
- As you will be aware, the site includes a reed bed which is of significant environmental importance which, should permission be granted would be destroyed. Not only would this impact on the habitat of the water voles – an incredibly rare species which is subject to protection, it would have a massive impact on water quality and the environment.
- The area of Gaywood Park has very little access to green space. Gaywood Park used to be a mainly social housing estate and to some degree it still is. This is the only green space left in Gaywood and has been left unkempt for many years with its main use being for wildlife and dogwalkers. The local school has stopped all non-school activity on its premises due to the risk of covid-19. They are following the suit of all other schools.
- This green space would be ideal serving its community if maintained as a good park for activities like football, cricket, etc for keeping children and adults fit, healthy, outside, creating social groups, reducing obesity especially in poorer communities but instead it could be lost to property developers with no consideration of the need for outside space.
- There are children and adults in clubs who have to travel further afield currently as there

are no local amenities to use. I object to the mass destruction of green space and feel it could be better used by the local community if the local authority and community groups got together to share ideas. Our greenspaces are invaluable and much needed.

- I object to this development because we have perfect full grown trees that are being cut down and a reed bed home to the rare water vole will be destroyed. The pollution from the extra cars in an age when we should be cutting back on pollution the added safety concern of the new roads in an area that has 3 schools are the children safe?
- I object that we have not got the right/chance to come to a planning meeting that will affect many people living in the Gaywood area with this building work that is proposed. Only 2 people allowed to speak at the meeting, how is that a fair representation of the Gaywood community?
- This is quite the saddest major housebuilding scheme I have ever seen to be considered by KLVNBC. The plans for an "Accelerated house building scheme" (designed to attract millions of grant aid from Government agency "Homes England") on the pretence that it is worth paying the price for this and in so doing to destroy a large tract of a beautiful and precious health-giving area rich in biodiversity - and vital for helping to combat Climate change - in order to accommodate the new rat-run road bridge over the railway line into Hardwick industrial estate, beggars belief. What is happening with existing brownfield sites in Lynn which would be better suited to development - or indeed tackling the hundreds of empty homes that could be brought into use rather than standing empty and unloved for years on end?
- The public have noted that the Borough council is not only the applicant but also the landowner - and through its planning committee also the decision maker, for this scheme.

Might be acceptable in law? But it is morally wrong (particularly with the various internal procedural issues that have already been called into question) and perhaps the right thing to do is to have the matter called in by the Secretary of State to enable a properly scrutinised judgement at a local hearing on the whole issue?

- Plantation: the habitat is calcareous marsh featuring a diverse assemblage of wetland trees, shrubs, reed and rush. At various points within part of the eastern area a Ph reading of 7.5 was recorded. The marsh is fed by an alkaline water supply from the surrounding agricultural land. Of particular note is the large area covered by Common Reed (*Phragmites australis*), a Fen habitat indicator, and an underlayer of moss.
- As this habitat floods and as a result is unable to fully decompose the dead plant material that has grown on it, it is one of the more efficient carbon sequestration habitats available. If it were shown to be creating peat it would differ in no significant way from the areas under conservation management in the UNESCO Fens Biosphere project, the transition area for which includes areas in the southern part of the King's Lynn and West Norfolk Borough. As such the proposed removal of the marsh area of the Gaywood Parkway development shows a troubling lack of commitment to the principles of the UNSECO Fen Biosphere vision.
- The due diligence of the King's Lynn and West Norfolk Borough should have determined whether the plant assemblage on site is creating or likely to create peat if left to its own function. An independent ecological survey should be conducted during the flowering season to make a comprehensive list of flowering plants and to take soil core samples to determine exactly how significant this area is and have it correctly designated.
- The life and diversity of this site spills over into the surrounding peri-urban environment and green spaces. These areas will surely become significantly impoverished if the marsh is developed making them a more unremarkable place to be and taking conscious steps to act in opposition to the efforts of the Fens Biosphere Vision which seeks to develop communities alongside critical functional habitat.
- I struggle to understand how the King's Lynn and West Norfolk Borough are planning to meet the Biodiversity Net Gain principle of development once this area is removed and indeed how the development hopes to justify the loss of an ecologically functional carbon sink in favour of what I assume will be a concrete reliant construction.
- The Officer's Report is in many ways a comprehensive document. An important exception is lack of information about the viability of the scheme. The following s106

expenses are included: £30,000 towards improvements of pitches at River Lane; £19050 Habitat monitoring and mitigation; £15000 Habitat monitoring and mitigation (is this part of above figure) and £19000 Regulation Levy. The total sum of the above although not inconsiderable pales into insignificance when set against the expenditure that will be incurred but which are not detailed in the report. The list includes cost of: road and bridge construction; changes to cycle route; contribution for public open space in accordance with current Local Plan; legal agreement to cover the cost of affordable; community Infrastructure Levy; contribution towards 47 secondary school places; contribution to Highways. In addition, there is money already spent, for example, cost of surveys and reports by Mott Macdonald - at least eight. We can only roughly estimate that the total cost of the above to community tax payers is in the millions. The very least that the people who foot the bill should be given is a breakdown of estimated costs and an estimated total. We also need to be advised of the risks involved. To give an example, there is mention but no clear explanation of money from central government - the Accelerated Construction Programme. What strings or risks are attached to this funding? Given that the council is both the developer and the decision maker, in the public interest, the viability of this development should be scrutinized by a higher authority.

- The online 38 degrees petition has 3,600 signatures. The petition ask that the east side of the site should be kept as a wild wood and reed-bed. The reed -bed is a priority habitat but receives little or no mention in the Officer Report. It takes up a large part of the eastern side of the site. Norfolk Biodiversity describes reed-beds as rare habitats. Norfolk Biodiversity Plan states that minimum requirement is to 'maintain existing area and quality' (of reed-beds). MBAP 31/12/98.
- The Officer Report under the heading Contamination (page 16) refers to 'Tidal Flat deposits (peat). Peat store significant amounts of carbon and the UK government plans legislation that will ensure peat remains in the ground. The PRA recommends that conditions must be included should consent be granted. There are thus worrying questions about what lies underground on the east side of the site. The carbon cost could be huge far out weighing the benefit of 57 affordable houses. Indeed the focus should be on the affordable houses because the housing crises is an affordability crises.

Norfolk Wildlife Trust (NWT) (John Hiskett): I did not intend to make any further comment with regard to Gayton Parkway development but have been approached by councillors asking about a survey report that was referred to in earlier correspondence, regarding the potential value of the Eastern Zone as a County Wildlife Site and the value of the habitats on the site. In order to help explain our previous comments, I have now decided to send a copy of this report (this is available to view via on the public file on the Council's website 'Norfolk Wildlife Trust Site Survey' 8th April 2021).

This is in the longstanding format of a CWS survey report and should only be seen in that light. The report would normally go to the CWS Partnership for discussion and a decision on whether CWS criteria have been met, based on the recommendations of the surveyor. In this case, the surveyor has suggested that the area is considered as an extension of CWS 408, if further surveys at an appropriate time of year support that view.

I hope this survey report helps explain why we are able to say that the Eastern Zone is potentially of CWS value but that a definite conclusion is not possible, given the current information available and notwithstanding the requirement to only proceed with designation with the agreement of the landowner. Hopefully it also clarifies why the value of the area is principally, as a mosaic of habitats, rather than any one habitat being of overriding value. Of these habitats, reedbed is listed as habitat of principal importance for conserving biodiversity in the Natural Environment and Rural Communities (NERC) Act 2006. This means that public bodies have a duty to have regard to these habitats when carrying out their normal functions, including the planning function. However the reedbed habitat is unlikely to fulfil CWS criteria in its own right and was considered by the surveyor under grassland, as that habitat includes marshy grassland, which may have a high proportion of reed.

Cllr Charles Joyce: I was told today that when Sir John Bagge sold land in Gaywood Park he placed restrictions on its use. One was that no trees could be felled and the rookery was to be kept. I did tell the caller that I knew Sir John and did not understand how he would have sold the land as the late Alan Burch told me he was one of the first intake to Gaywood Park School (KLA to you). And that it was more likely to be Sir Picton Bagge who was the father of Sir John and grandfather of Sir Jeremy. But it could have been Sir Picton's brother Alfred William as if memory serves me correct he was in position when the land was sold. Too long since I read Debretts to be sure.

I've not had chance to speak to Chris who did her PhD on the Bagge family. Do you have any information of whether or not there is any covenant or restrictions of use placed on the sale of the land in Gaywood?

Cllr Sandra Squires:

1) What is the exact number of trees that will be removed? There are different numbers mentioned in various reports and talk of "tree groups" which doesn't specify actual numbers. I'd like a definitive figure on the number of individual trees please.

2) Assuming the Borough Council owns the Eastern part of the site, did this form part of the purchase from the college, or was it separate and when did this deal take place. I'd like to know how long the Council has owned the Eastern part in particular.

3) Considering the report on birds on the site, has there been any discussions with the RSPB on this? Have they commented at all or been approached for advice?

Cllr To Ryves: I am a bit puzzled as to the Mott Macdonald as there seems to be an anomaly between the " preliminary ecological survey" and the ecological support statement, in that the latter refers to a diverse range of landscape types, whilst the former features a useful map which has a simplistic map of land types the land types.

I am concerned as the officers in their report refer to an "area of rougher scrubland and roughly interspersed woods" which is not consistent with the detailed description offered in the ecological support statement.

This description is also clearly at odds with the views of the Norfolk Wildlife Trust in that "the mosaic of habitats that covers much of the Eastern Zone area has local biodiversity value and that every effort should be made to retain as much of this area as possible". Indeed, the NWT goes further and refers to "the potential County Wildlife Site value of the Eastern Zone of Gayton Parkway development".

I understand that the NWT officer who visited the site has not yet submitted her full report – I would ask that the planners ask specifically for this as there is clearly a significant discrepancy in the perception of the ecological value of this land.

Additional questions:

1. What is the business case for the bridge
2. What are the estimates of use and journey type, and traffic flow timings
3. As I understand it, it is hoped that funding for the bridge will come via the Town Fund. What other projects has it displaced if it is funded this way?
4. Presumably there will be costs in making the spine road suitable for the bridge and in improving the roads going through Hardwick. Can these be broken down please?
5. Also it might be the case that a trunk road will be put through the unused land to the south of the bridge to (one of) the roundabouts. What will the construction costs of this be and who will bear them?
6. What is the cost of building the bridge, perhaps stated using this simple formula.

Simple formula to estimate roughly how cost change with its size:

$$\text{Cost} = a * L * S * N * C * b$$

a is a constant

L is an overall length of bridge

S is the square of span length

N is the number of spans

C is the capacity of the bridge, load per meter (or ft)

b is an adjustment for complications, such as difficult groundwork, and different bridge types.

7. If the bridge was not pursued, what would be the costings and proceeds for EITHER the full development (ie 379 houses) OR only developing the WEST part of Parkway?

8. What are the exceptional costs of land and drainage issues to be resolved in the EAST side of Parkway?

9. Is it possible to supply numbers as follows?

1. West only

2. West plus East, no bridge

Cllr Jo Rust: I'd like further information pertaining to the "improved" play area. The play area already serves a large estate. Exactly how is it going to be improved and what size will it increase from? It states there'll be 4.36 hectares of open space across the site and I'd like a breakdown of what that constitutes compared to what is already there - MUGS, Skate Park and play area.

Norfolk Wildlife Trust want to make the eastern side a nature reserve, what consideration has been given to this? Bearing in mind their original comments were made based on the fact that they believed the eastern side was a part of the allocated site in the current local plan.

Planning Policy: The Borough Council of King's Lynn and West Norfolk (BCKLWN) is required to have three elements in place if it wishes to retain control of determining planning applications locally. Failure in any of these areas could result in the presumption in favour of suitable development being engaged, as set out in the National Planning Policy Framework (NPPF).

Broadly this could result in far more housing development than is required, and of an unplanned nature, taking place, as well as in less desirable locations i.e., those not specifically allocated within the Local Plan for new housing or within settlement development boundaries. The Government provides a standard methodology that each Local Planning Authority should use to calculate their Local Housing Need (LHN) figure. The BCKLWN's LHN is in the region of 550 new homes per year. This means that 540 new homes are required to be built and completed each year within the Borough:

1. An update to date Local Plan - Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The Local Plan currently comprises the Core Strategy (2011) and the Site Allocations & Development Management Policies Plan (2016). The current Local is up-to-date. Whilst the BCKLWN is working towards the development of a Local Plan review, which it anticipates to publish and submit for examination later this year (subject to Cabinet and Full Council approval), the review does not at this time form part of the formal Local Plan.

2. 'Pass' the Housing Delivery Test (HDT) - The BCKLWN must be able to demonstrate that enough new homes have been delivered over the past three years, measured against how many new homes should have been delivered (The LHN). This is expressed as a percentage and is tested every year, with results are published in November and are fixed for 12 months until the next years' results are published. Currently the BCKLWN result is 94%, which is 1% shy of the 95% pass mark. This means that BCKLWN is required to update its Housing Delivery Test Action Plan. The previous years' result was significantly lower than this, and resulted in an additional 20% buffer being applied to the 5-year housing land supply test, which makes this

harder to pass and therefore more likely that the presumption in favour of sustainable development is engaged.

3. Demonstrate at least 5 years' worth of housing land supply - Whilst the HDT looks at actual new home completions over the past 3 years, this test looks at how many new homes have planning permission and are reasonably likely to be delivered in the next 5-year period. For example, a site that has got full planning permission, with a housing builder onboard and details are known for when the site will start and most likely be completed, then this site and the homes could be counted within the housing supply. Whereas a site that has outline permission and is owned by someone who is looking to sell the site, it is reasonable to assume that this may not come forward in the next 5 years and therefore should not be counted towards the supply. The BCKLWN must be able to demonstrate its position at all times. In the past the BCKLWN has had difficulty in being able to demonstrate a healthy land supply position, i.e., in excess of five years' worth. However, in recent years the position has greatly improved with the current position being just below 8 years' worth housing land supply.

Therefore, it is vital that the BCKLWN presses ahead with its Local Plan review, and continues to, at the very least grant planning permission which are in accordance with the current Local Plan to ensure that there is enough housing land supply to pass the 5-year housing land supply test and that enough new homes are built/completed within the Borough so that the Housing Delivery Test is continually passed. More on this subject, and what other measures the BCKLWN are taking to boost the provision of new homes within the Borough can found within the Borough Council's Housing Delivery Test Action Plan Update: https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan

The 'Parkway' development proposes 379 new homes over its construction lifetime and therefore will contribute towards the BCKLWN being able to demonstrate a continuous healthy 5-year housing land supply position and assist in 'passing' the Housing Delivery Test over a number of years. The position is solidified as the development can be classed a deliverable as part of it forms an allocation within the current up-to-date Local Plan, it may have full planning permission in due course, a house builder is on-board, funding is in place, and the build programme will also be known.

The Local Housing Need (LHN) is in the region of 540 new homes required each year. Broadly the development represents 0.7 years' worth of housing (379 / 540) which measured against a requirement of 5 and 3 years in the respective tests could be considered a significant contribution.

Ecologist (Mott Macdonald): We don't dispute the mosaic nature of the site, and hence its value. We are not sure that the site receives water from agricultural land; there is only one arable field, the other side of the railway, and we had understood the movement of groundwater to be from north to south i.e. from the site to the arable field, and not the other way around. The largest area of Phragmites is arguably the adjacent Anglian Water reservoir, the vast majority of which is remaining in situ.

The proposals have sought to include a buffer of retained habitat to the edges of this Eastern site, to limit the effects on the surrounding environment and green spaces and to allow some retained connectivity from east to west. These proposals also include for the improvement of a number of the ditches, where water vole signs have been found but which depleted in nature due to the sedimentation that has been allowed to take place, and their evident contamination, both chemical and otherwise.

In relation to Biodiversity Net Gain, this is not yet a planning requirement. Mitigation and compensation habitat planting has been allowed for, both on and off-site. Drainage and habitat creation will be combined as far as is practical; new watercourses and related features are being created to compensate for the loss of water vole habitat lost to the scheme, either

temporarily or permanently, connecting in with existing watercourses, the AW reservoir etc. Further habitat enhancement has already taken place offsite, at a nearby SSSI site, to ready it as a receptor site for the reptile's translocation effort that will be required should the project proceed.

We are generally in agreement with the survey results as presented by NWT. Of note is that part of Area 1 is to be retained and used for creation of habitat, not least as means of mitigating for effects of water voles, in a small number of ditches that will be affected either permanently or temporarily, during construction of the road and bridge. Similarly, the majority of Area 2 will remain intact. The northern end of the AW reservoir will be affected during the construction of the spine road into the site, but we have worked hard to minimise this, given all the other constraints in this area. We can confirm that NWT's assessment of habitat, undertaken from outside the fenced off site, is accurate. The AW reservoir was presumably a larger area of open standing water in the past; it now includes some fairly sizeable areas of Phragmites reed. The terrestrial edges are, as predicted by NWT, scrub over grassland.

We also generally support NWT's survey results in terms of the habitats in Area 3. We do feel that the survey report does not represent the poor condition of some of the boundary ditches, most of which contain large amounts of sediment, and also show signs of chemical pollution. The ditches, and associated buffers of habitat, will be retained, and the ditches improved as part of efforts to mitigate for effects on water vole populations. Signs of water vole have been found in parts of these ditches, and we feel that the proposed careful enhancement will bring benefits.

Assistant Director's comments:

The majority of the concerns raised in the additional public comments received have already been addressed in the Officer's report. However, the following responses are in relation to new issues raised.

In terms of the concern that the design features of the development will be of no benefit to existing residents, it is important to note that all public open space within the development will be available for use by existing and future residents which includes the relocated and improved play area and MUGA facilities.

Many comments and concerns have been raised in relation to the reedbeds within the eastern part of the site and specifically make reference to the comments received from Norfolk Wildlife Trust (NWT). Officers have fully considered their importance as part of the assessment of this application and as confirmed by the comments of the applicant's Ecologist above, there is no dispute regarding the mosaic nature of the site, and hence its value. However, it is important to note that part of Area 1 (eastern most parcel of the site adjacent to Silver Green Road) which includes reeds, is to be retained and used for creation of habitat and similarly the majority of Area 2 (area owned by Anglian Water) will remain intact which also consists of extensive reeds.

Although the majority of proposed residential development within the eastern area will be within Area 3, it is clear some of the boundary ditches are in poor condition. As confirmed by the Ecologist in their comments above, the ditches, and associated buffers of habitat will be retained and the ditches improved. As already advised in the Officer's report it is clear that the application site provides habitat for a range of protected species and it is therefore inevitable the development proposed will have some impact on these habitats but wherever possible the key features will be retained and have been incorporated into the design of the proposals. On this basis Officers are satisfied any harm as a result of the proposed development would not be significant, and would be suitably mitigated and outweighed by the numerous benefits of the scheme.

In response to concerns that the Council is applicant, landowner and decision maker for this scheme, that is no different to many planning applications for Council developments. The same

process of determination is followed for all planning applications and it is therefore important that the local planning authority treats this application exactly the same as any other submitted by a private landowner or developer.

In response to queries regarding the overall viability of the scheme and total costs of the proposed development, these are not material planning considerations as the developer is not proposing to reduce affordable housing from its policy requirements, and it will be down to the developer to consider whether the final scheme is a viable one.

In response to Cllr Joyce's query, there are no restrictions of that sort on the land proposed for development. Also, it is important to note the application does not affect The Rookery and no part of the site is proposed to be accessed via the Rookery for development traffic. At the suggestion of the Woodland Trust a new footpath has been incorporated through the development on the Eastern side (above the Rookery), which gives a better desire line for walkers who are going into town. Over time it is hoped that this will reduce the number of people in the Rookery, giving nature in that area a small boost.

In response to the queries raised by Cllr Squires:

1. A total of 58 no. individual trees are proposed to be removed as part of the development proposals, in addition to 6 no. category 'C' tree groups. In addition to this there would be partial removal of 3 no. category 'A' tree groups and 4 no. category 'B' tree groups. Individual tree numbers are not specified within the groups to be removed. Those groups to be removed in their entirety are low category trees which the British Standard advises should not be seen as a constraint to development. Furthermore, where partial removal of tree groups is proposed, individual tree numbers have yet to be confirmed as it is stated in the report, should development proceed, the arboricultural consultant will liaise with the Council's tree officer (Richard Fisher) to decide which trees are acceptable to be removed within those groups.
2. It is understood the Council acquired the land within the eastern part of the site (north of the sand line railway and excluding that owned by Anglian Water) in 1954.
3. The RSPB are not a statutory consultee and have not provided any comments on this application.

The queries raised by Cllr Ryves in relation to the landscape types / habitats has largely already been covered by the response above in relation to the reedbeds and NWT's comments. However, as a point of clarification, where the Officer report refers to "rougher scrubland and roughly interspersed woods" within the eastern section of the site, this is a general overview of the landscape and is not a definitive breakdown of all the types of habitat across the site which is covered in more detail within the 'Ecology - Protected Species' section of the report as well as the supporting documents for the application.

In response to Cllr Ryves queries in relation to cost / benefit analysis in relation to the bridge, these matters are not planning considerations, rather a matter for the developer. In terms of estimates of use and journey type, and traffic flow timings, a Transport Assessment was submitted in support of the application that fully considers the potential impacts of the new bridge on the existing highway network. As confirmed within the Officer report, conditions are recommended to be imposed that monitor usage at the bridge and if required, implementation of control measures.

In relation to the queries raised by Cllr Rust, the proposed development provides a generous amount of public open space that accord with Policies DM16 and E1.6 of the SADMP (2016). The existing skate park would remain in situ and the existing MUGA and play park will be relocated and improved. Furthermore, the Council's Public Open Space team have no objection to the proposals for the areas of play. They have confirmed that most of the equipment doesn't

comply with current standards and regulations, the remaining items are outdated and the conditions underground are unknown. As a result, all the equipment will be replaced but the park itself will not be any bigger as such. All current equipment will be replaced ensuring the new equipment enables inclusive play.

In terms of the query raised by Cllr Rust in relation to the CWS potential of the eastern part of the site, consideration has been given to this by Officer's as explained on p52 of the Officer's report. Furthermore, the latest comments received from NWT which enclosed an initial site survey report, makes it clear a definitive conclusion is not possible at this stage. There would be a further process to go through, including further survey work, before it could be determined whether the site was suitable as a possible extension to existing CWS 408 and it would also be dependent upon agreement by the landowner.

As stated earlier the initial survey report referred to above is available to view via the public file on the Council's website 'Norfolk Wildlife Trust Site Survey' 8th April 2021.

CORRECTION

The first sentence of the last paragraph on p11 should read:

"A total of 964 car parking spaces are proposed for the development and 179 plots will be provided with garages".