

Borough Council of  
**King's Lynn &  
West Norfolk**



# **Local Plan Task Group**

## **Agenda**

**Monday, 21st October, 2019**  
at 11.00 am

in

**Meeting Room 2-1  
King's Court  
Chapel Street  
King's Lynn  
PE30 1EX**





**King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX**  
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11 October 2019

Dear Member

**Local Plan Task Group**

You are invited to attend a meeting of the above-mentioned Task Group which will be held on **Monday, 21st October, 2019 at 11.00 am** in **Meeting Room 2-1, Second Floor, King's Court, Chapel Street, King's Lynn** to discuss the business shown below.

Yours sincerely

Chief Executive

**AGENDA**

1. **Apologies**
2. **Notes of the Previous Meeting - TO FOLLOW**
3. **Matters Arising**
4. **Declarations of Interest**

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Members should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting.

**5. Urgent Business**

To consider any business which, by reason of special circumstances, the Chairman proposes to accept as urgent under Section 100(b)(4)(b) of the Local Government Act, 1972.

**6. Members Present Pursuant to Standing Order 34**

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before the meeting commences. Any Member attending the meeting under Standing Order 34 will only be permitted to speak on those items which have been previously notified to the Chairman.

**7. Chairman's Correspondence (if any)**

**8. LP26 Residential Development adjacent to existing settlements**  
(Pages 6 - 26)

**9. South Wootton E3.1** (Pages 27 - 36)

**10. North Wootton** (Pages 37 - 42)

**11. Downham Market and LP35, F1.1, F1.2, F1.3 and F1.4** (Pages 43 - 63)

**12. Date of Next Meeting**

The next meeting of the Task Group will take place on Wednesday 6 November 2019 at 11 am in Meeting Room 2-1, King's Court, Chapel Street, King's Lynn.

To:

**Local Plan Task Group:** R Blunt, F Bone, A Bubb, C J Crofts, M de Whalley, C Joyce, J Moriarty, T Parish, S Sandell and D Tyler

Alex Fradley, Principal Planner  
Alan Gomm, Planning Policy Manager  
Peter Jermany, Principal Planner (Policy) and Water Management Officer

## **Draft Policy LP26- Residential Development Adjacent to Existing Settlements 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=s1542883815232#section-s1542883815232>

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

- It is worth noting that many such development as envisaged as coming forward through this policy can already take place through ‘DM3 Development in Smaller Villages and Hamlets’ of the SADMP and/or the NPPF (Rural housing section para. 78). The policy is designed to give a local flavour and balance so that development could take place at higher order settlements i.e. the more sustainable locations. It also offers a degree of protection to the AONB, and allows local communities through their Neighbourhood Plans to retain an element of control and decide how best to accommodate future growth. The policy doesn’t apply to anywhere as a site needs to be reasonable related to a sustainable location i.e. a settlement as listed within the revised Settlement Hierarchy. Note that the revised settlement hierarchy seeks to remove many of the very rural settlements from the Smaller Villages and Hamlet category and classify them as part of wider countryside and therefore this policy wouldn’t apply in such areas.
- Balance of people who Support and Object:
  - Many want the policy opened up to be more flexible i.e. can take place in the AONB, Neighbourhood Plan areas, for larger sites, and for wider geographic scope.
  - Many want it delated altogether.
- There is support for custom and self-build element of the policy
- Further explanation to ‘adjacent to existing settlement’ – This should perhaps read ‘reasonably related to’ and mention both the settlement and the development boundary to provide clarity.
- Explain C&SB element and link to relevant section (note that such a policy with encouragement for C&SB form part of the Borough Council’s Custom & Self-Build Action Plan)
- Explain AONB protection and link to new policy – which will include a map of the AONB
- Explain Neighbourhood Plan protection element
- Not raised but probably need to add reference to special consideration for areas which could impact upon the Environmental and Historic designations

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- Not raised but if a Neighbourhood Plan covers an area in the AONB make it clear that the Neighbourhood Plan cannot override the protection afforded to the AONB.

**Policy Recommendation:**

**Policy LP26 – Residential Development Adjacent Reasonably Related to Existing Settlements**

1. Residential development will be permitted adjacent to existing in areas reasonably related to existing settlements identified in the Settlement Hierarchy Policy (LP02) and their development boundaries where it involves:
  - a. the sensitive infilling of small gaps either wholly or in part, or rounding off the existing development boundary; and
  - b. the development is appropriate to the scale and character of the settlement and its surroundings; and
  - c. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality.
2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.
3. Additional weight will be given to proposals for Custom and Self-Build development.
4. This Policy does not apply within the Norfolk Coast Area of Outstanding Natural Beauty (AONB)
5. This Policy does not apply to settlements covered by a Made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this, having taken into account point 4).

**Please note:**

- That former point 1c is now point 3
- Former point 3 has been spilt into point 4 & point 5 to make the relationship between the policy, the AONN and Neighbourhood Plans clear

## Supporting text:

### Introduction

The policy is designed to provide more modest levels of growth of an appropriate character, within all settlements, by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development adjacent to existing development.

This policy is designed to provide a flexible framework for more modest levels of growth of an appropriate character by identifying the key types of development likely to be suitable, and enabling appropriate, small-scale development reasonable related to existing settlements in a sensitive manner. The policy should support housing developments which reflect local needs and promotes sustainable development in rural areas, with a view to enhancing and maintaining the vitality of such communities, allowing them to grow and thrive.

### Relevant Local and National Policies

- National Planning Policy Framework - Delivering a sufficient supply of homes:
  - Core planning principles (roles and characters of different areas)
  - para 59: Delivering a sufficient supply of homes
  - para 77 - 79: Rural Housing
  - para 172: Conserving and enhancing the natural environment
- Strategic Policies
  - LP01: Spatial Strategy
  - LP02: Settlement Hierarchy
  - LP37: Development in Rural Areas
  - LP25: Housing Distribution

∞



- LP06: The Economy
- LP32: Community and Culture
- LPXX Norfolk Coast AONB

## Policy Approach

Infill development can make an improvement to the street scene where a gap has been left, for example due to demolished buildings or where it replaces lower quality development. It also provides the opportunity to add to the local housing stock without spoiling the form and character of the settlement. This policy clarifies the form of infill development that will be permitted in these designated settlements.

It is recognised that windfall development makes an important contribution towards housing supply and delivery throughout the Borough. It allows enables people to live in desirable sustainable locations. This policy creates the opportunity for further windfall development to come forward, however it recognises that such development needs to be appropriately located and of an appropriate nature. This policy clarifies the form of infill development which could be permitted.

The policy recognises that areas which sit outside of defined development boundaries, for settlements listed in the settlement hierarchy, which are close to the settlement may be sustainable locations for housing development, i.e. close to services and facilities. This is why the policy states 'reasonably related to' the settlement and development boundary as these areas could be considered part of the settlement although they sit outside of the settlement's development boundary. The policy also caters for the rounding off existing development boundaries. The policy makes it clear that the proposed development does not have to be immediately next to the development boundary.

Infill development can make an improvement to the street scene where a gap has been left, for example due to demolished buildings or where it replaces lower quality development. It also provides the opportunity for growth without spoiling the form and character of the settlement.

The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of this type of housing. Further details on this can be found within the introductory text to Policy LP01 – Spatial Strategy Policy, under the heading 'Custom and Self-Build' and the Borough Council's Custom & Self-Build Action Plan.

The Norfolk Coast Area of Outstanding Natural Beauty (AONB) covers a significant portion of the Borough. The statutory purpose of designating an area of land as an AONB is to conserve and enhance the natural beauty of the area. This comprises the area's distinctive landscape character, biodiversity and geodiversity, historic and cultural environment. With this in mind and in line with NPPF, Policy LPXX Norfolk Coast AONB, and taking into consideration the Norfolk Coast Partnership's management strategy '*Norfolk Coast Area Of Outstanding Natural Beauty Strategy*' this policy does not apply to areas which are within the AONB.

Careful Consideration will be required for areas which could impact upon natural environment designations and their setting, for example the Breckland Special Protection Area (SPA). And for areas which could have an impact upon historic environment designations and their settings such as conservation areas.

The Borough Council is very supportive of those communities who wish to prepare a Neighbourhood Plan for their Area. As such the Borough Council believes it should be up to the Qualifying Body (town/parish council or forum) and the local community to decide if this policy should apply within their Area. Having taken into account that the policy doesn't apply to areas which are within the AONB. Please see Policy LP01 – Spatial Strategy Policy for further information in relation to Neighbourhood Plans.

**Sustainability Appraisal:**

| LP26: Residential Development adjacent to Settlement Boundaries |               |   |   |   |   |     |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |                              |
|---|---------------|---|---|---|---|-----|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|------------------------------|
| 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 | +  | -  |                              |
| <b>LP26</b>   | -             | 0 | 0 | 0 | 0 | +/- | + | + | 0 | 0  | 0  | 0  | 0  | 0  | +  | 0  | 0  | 0  | +  | +  | +6 | -2 | Likely Positive Effect<br>+4 |
| <b>Draft LP26</b>   | -             | 0 | 0 | 0 | 0 | +/- | + | + | 0 | 0  | 0  | 0  | 0  | 0  | +  | 0  | 0  | 0  | +  | +  | +6 | -2 | Likely Positive Effect<br>+4 |
| <b>No Policy</b>  | 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        |

⇒ The proposed policy has been amended in order to clarify the position with regards to the AONB and relationship with Neighbourhood Plans. The supporting text has been expanded upon to provide further detail to the approach of the policy and explain the rationale for the points within the policy. It also explains that adjacent to the settlement does not mean the development boundary but close to the settlement.

These proposed amendments whilst add clarity to the policy do not alter the Sustainability Scoring between the daft version and that now prosed. However, the proposed policy and supporting text is preferred for the reasons stated.

**Appendix 1: Summary of Comments & Suggested Response:**

| Consultee                 | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action   |
|---------------------------|--------------------|---|----------------------------------|--|
| Mr Michael Rayner<br>CPRE | Object             | CPRE Norfolk is concerned by the phrases "the sensitive infilling of small gaps" and "rounding off" in this policy, as these are far too subjective. They could be used to justify unsustainable, unplanned and inappropriate development which did not recognise the intrinsic character and beauty of the countryside. By potentially allowing development adjacent to existing settlements there is a danger that this policy would be used to justify development adjacent to a development boundary where it would not be infill but expanding the settlement. It is also likely that such development would not be providing often much needed affordable housing, but would instead be used to provide market housing. Many of the smaller rural settlements now have development/settlement boundaries allowing for some development within them. It is therefore important not to allow further growth outside of these boundaries, as this would lead to the possibility of exaggerated, unplanned and unsustainable growth in these smaller settlements in particular. Point 2 saying "In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community", is too vague with several phrases which could prove to be loopholes for unneeded development. These phrases are: "in exceptional circumstances"; "may be considered appropriate"; "particularly high quality"; "would provide significant benefits. | Delete the policy                | <b>Noted, However different direction proposed in order to meet Housing Need.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required. The policy applies to sustainable locations which re reasonable related to sustainable settlements as listed by the revise settlement hierarchy. The policy offers protection to the AONB and also those preparing Neighbourhood Plan can decide how best to accommodate growth. |
| Mr T Richardson           | Support            | Support is expressed for the wording of bullet point 1(a) within LP26 in that it will enable sensible rounding off of villages. Concern is expressed in respect to bullet point (3) in respect to neighbourhood plans, as it is for the neighbourhood plan to accord  | Delete bullet point 3            | <b>Support Noted. However we want to support local communities through their Neighbourhood Plans.</b> This   |

| Consultee                        | Nature of Response | Summary  | Consultee Suggested Modification   | Officer Response / Proposed Action  |
|----------------------------------|--------------------|--|--|---|
|                                  |                    | with the local plan and not vice versa.  |  | policy is not classed as a strategic policy and Neighbourhood Plan only have to consistent with strategic polices of the local plan (see NP Basic Conditions)   |
| Mr J Maxey<br>Maxey Grounds & Co | Support            | Strongly support the principle of infill and / or rounding of development in or adjoining settlements. My comment would be that in defining the settlement boundaries there are often concentrations of development that are not marked as part of the settlement, and so to which a policy targeted as being applicable to areas adjacent to settlement would apply. Suggested this is amended to also include concentrations of development outside and not necessarily adjacent to a settlement, but where the development would clearly be infill, not extending the linearity of a frontage, or extending further into open countryside | Expand to include concentrations of development outside settlements                  | <b>Supported Noted.</b> This perhaps would be too flexible and lead undesirable development. The policy is designed to support sustainable settlements enabling growth and the potential to thrive  |
| Mr & Mrs Gerald Gott             | Object             | We object to policy LP26 as it predicated on development boundaries around settlements which are contrary paragraphs 77 and 78 of the NPPF 2019 (see our representation about Policy LP04)   | Delete the policy  | <b>Disagree.</b> Don't believe this to be the case. On the contrary the policy is consistent with NPPF section on Rural housing. This allows for rural areas to grow and thrive. It is not seeking support isolated homes in the countryside. |
| Mr Nathan Rose                   | Mixed              | This policy reads as if it will much too easily provide a loophole against Policy LP04 Development Boundaries, especially when read with point 4.4.1 in that policy. This LP26 policy seems to be in direct contradicton of LP04. Moreover, it makes no reference to LP04 and therefore can be read and interpreted standalone. Point  | e) it is clear that it is not attempting to circumvent the principles of development | <b>Noted, disagree with suggested modifications.</b> Draft Policy isn't saying the site has to be next to the development boundary  |

| Consultee                                       | Nature of Response | Summary  | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|---|--------------------|--|---|--|
|   |                    | 1a could imply that once the development boundary has been extended by rounding off, that new boundary could be further extended by rounding off, and so on, enabling creep and sprawl. It should be made clear that the principles of Policy LP04 will always carry greater weight than LP26. Also my comments against LP04 regarding additional efforts to raise awareness for residents and the public of such applications, and giving their views additional weighting, are applicable here.  | boundaries (LP04)<br>f) additional weight given to the views of local residents | hence the link to the settlement not the boundary/ reasonable related to...<br>Local / public views will be taken into account at the planning application /determination stage  |
| Mrs Erica Whettingsteel<br>EJW Planning Limited | Support            | The Policy needs to be expanded to include smaller villages and settlements, not just those identified in the settlement hierarchy. As currently drafted the policy does not accord with National Guidance. Paragraph 78 of the NPPF acknowledges that it is not just villages containing local services that can provide for housing growth, and states that where there are groups of smaller settlements development in one village may support services in a village nearby. This is further reiterated in the Planning Practice Guidance that states that all settlements can play a role in delivering sustainable development in rural areas and that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. The bullet points in part 1 of the policy require refinement to ensure that they are sound, consistent with national policy and positively prepared | Expand and delete d)  | <b>Support acknowledged. Believe point d) is important.</b> d) it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. Policy is consistent with NPPF 78 as includes places considered to be settlements according to the settlement hierarchy which includes smaller villages and hamlets. |
| Mrs Sarah Bristow-Gayton Parish                 | Object             | Comment: We would suggest that LP26 is actually redundant in terms of what, on the surface, it seems to be trying to achieve. Exceptions for development outside the development boundary are covered in LP04 clause 2. We suggest that all reference to LP26 is removed from clause 3 in LP04, 15.0.3 and Clause 7 in LP37, and LP26 is deleted completely. Rationale: We are responding on behalf of Gayton Parish Council. Gayton is currently developing a Neighbourhood Plan, a process which should be complete before   | Broadly delete the policy   | <b>Disagree.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need. The BC need to meet both the   |

| Consultee | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action  |
|-----------|--------------------|---|----------------------------------|---|
|           |                    | <p>the introduction of the Local Plan in which case LP26 would not apply. However, the Neighbourhood Plan is currently not 'made' and therefore we feel it is appropriate that we do comment on LP26. The introduction of LP26 appears to be aimed at allowing small, sensitive developments of gaps to support the needs of small communities. What it seems to do (in Clause 2) is introduce a hitherto disallowed mechanism for developers to build 'small' developments of market housing with a smattering of affordable homes in small villages and hamlets. This clause seems particularly open to abuse/challenges by developers: imagine the situation where there is a recognised need for affordable housing in a community. Under LP26, a developer could offer to build affordable housing but (see LP25), this might mean that a 'small group of dwellings' of 10 houses could consist of 2 affordable houses and 8 market houses. We do not think this is what is intended by LP26. More generally, if affordable housing is required (or custom and self-build etc.), this is generally covered by the exceptions in LP04. However, these policies have the effect of diluting the provision of affordable homes as they are allowed to be provided as a percentage within a development of market housing. If the planning system is serious about promoting affordable housing, then policies such as LP26 need to be explicitly restricted to allowing Cont..... exceptional development only for 100% affordable, or custom, or self-build (etc) housing. Mixed schemes are well covered elsewhere and introducing possible loopholes which culminate in the disregarding of development boundaries is inevitably going to destroy public confidence in the efficacy and usefulness of development boundaries and ultimately brings the planning system into disrepute.</p> |                                  | <p>need and ensure that these homes are actually delivered. To achieve this a wide range of measures will be required. The policy allows also for Neighbourhood Plans to incorporate this approach if they wish or devise their own approach. The policy could be applied to variety of housing types including market housing, affordable housing, build to rent or custom and self-build (CS&amp;SB) etc... C&amp;SB is give additional weight in line with BC's C&amp;SB Action Plan</p> |

| <b>Consultee</b>     | <b>Nature of Response</b> | <b>Summary</b>  | <b>Consultee Suggested Modification</b> | <b>Officer Response / Proposed Action</b> |
|----------------------|---------------------------|---|---|---|
| Richard Smith<br>NPS | Support                   | provides opportunities for infilling of land adjacent to settlement boundaries  |   | <b>Agreed</b>                             |
| Ian Cable            | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr A Garner          | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr D Russell         | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr D Miller          | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr R Cousins         | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr A Golding         | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr & Mrs J Lambert   | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mrs A Cox            | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Dr A Jones           | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality. |   | <b>Agreed</b>                             |
| Mr & Mrs Clarke      | Support                   | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements,   |   | <b>Agreed</b>                             |



| Consultee   | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action  |
|---|--------------------|--|----------------------------------|---|
|   |                    | with the ability to provide added character and vitality.  |                                  |   |
| Mr L Aldren   | Support            | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.  |                                  | <b>Agreed</b>   |
| Wotton Brothers-<br>Wotton Brothers<br>Farm                   | Support            | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.  |                                  | <b>Agreed</b>   |
| Mrs B Johnson   | Support            | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.  |                                  | <b>Agreed</b>   |
| Mr R Garner   | Support            | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.  |                                  | <b>Agreed</b>   |
| Mr N Good   | Support            | 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. |                                  | <b>Support acknowledged.</b><br>The approach to development boundaries is broadly to include sites once they are built out. In order to retain an element of control. |
| Ms Debbie Mack<br>Historic England                            | Support            | Historic England 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 to the street scene or views  |                                  | <b>Support Acknowledged and Points Agreed</b>   |
| FK Coe & Son<br>Landowners (clients)<br>Lois Partridge Senior | Support            | Policy LP26 states that: 'Residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy Policy LP02 where it involves: a. the sensitive infilling of   |                                  | <b>Agree</b> with the comments made about encouraging windfall sites & flexibility of   |

| Consultee          | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action |
|--------------------|--------------------|--|----------------------------------|------------------------------------|
| Associate Sworders |                    | <p>small gaps either wholly or in part or rounding off the existing development boundary; and b. the development is appropriate to the scale and character of the settlement and its surroundings; and c. additional weight will be given to proposals for Custom and Self-Build development; and d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality. 2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community. 3. This Policy does not apply within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this). Paragraph 81 of the NPPF notes that planning policies should: d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.’ Paragraph 117 also notes that: ‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.’ Our client welcomes the introduction of Policy LP26, which would enable more windfall sites to come forward, and increases the flexibility of the Plan to accommodate new housing. Policy LP26 also complies with national policy and reflects the Government’s agenda to proactively plan to meet future housing needs. Amendments to the development boundaries in Neighbourhood Plans, as proposed in Policy LP04, may also provide new opportunities for sites to come forward under Policy LP26 of the Plan, further increasing the flexibility of the Development Plan as a whole. One of our client’s sites in Grimston, Land east of Church Close, would comply with the criteria set out in Policy LP26, by infilling the gap between the two</p> |                                  | meeting housing needs              |

| Consultee      | Nature of Response | Summary   | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|----------------|--------------------|---|---|--|
|                |                    | parts of the settlement boundary along Vong Lane. A small, high quality group of dwellings on this site would fill a gap which does not provide a positive contribution to the street scene or views in/out of the locality. It would round off the existing development boundary and could be appropriate to the scale and character of the settlement and its surroundings.   |   |  |
| Holkham Estate | Support            | Whilst support is given to the general principle of Draft Policy LP26, suggested modifications to the wording are set out below to better reflect the provisions of the NPPF. It is considered that draft criterion 2 restricts the potential for the delivery of affordable housing and it should be deleted. In order to enable affordable housing to be delivered at sites coming forward as part of Policy LP26, sites would need to reach the thresholds set out at Draft Policy LP25: ☐ King’s Lynn, Downham Market and Hunstanton - Sites of 0.33 ha or 10 or more dwellings ☐ Rural areas - Sites of 0.165 of ha or 5 or more dwellings Draft criterion 3 is also restrictive. ☐ It is questioned what the justification is for all windfall development to be restricted throughout the AONB. Providing that development complies with the requirements of Draft Policy LP26 and other relevant Development Plan policies, particularly, Draft Policy LP17 ‘Environmental Assets’, windfall development should be allowed to come forward in order to boost the supply of homes throughout the Borough reflecting the objective set out at paragraph 59 of the NPPF. As such it is suggested this part of the criterion is deleted. ☐ Neighbourhood Plans should reflect the adopted Development Plan. It is questioned why settlements with a made Neighbourhood Plan should be exempt from future windfall development, particularly where there is no requirement for Neighbourhood Plans to allocate sites for development. As such it is suggested this part of the criterion is deleted. In respect of criterion 1c, it is suggested by the Council that additional weight | Suggest that b) is removed to allow affordable housing. Should apply to the AONB, see NPPF 59. Should apply to Neighbourhood Plan areas. Suggests additional weight for build-to-rent | <b>Support acknowledged. Although don’t agree with all points made.</b> Affordable housing can come forward as this may be appropriate. BC seeking protection of the AONB. BC supporting local communities through Neighbourhood Plans. Is an important sector, BC will update Strategic Housing Market Assessment (SHMA). BC focusing on Custom & Self Build in line with BC C&SB Action Plan. Of course Build To Rent could come forward under this policy |

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|---|--------------------|---|---|---|
|   |                    | <p>should be afforded to Custom and Self-Build development. Similarly, it is requested that the Council considers affording additional weight to 'Build to Rent' development having regard to up to date evidence. The Borough Council of King's Lynn and West Norfolk 'Strategic Housing Market Assessment – Update' (June 2014) considers recent trends in the private rented sector (paragraphs 4.14 and 4.27). The SHMA Update refers to a national report 'Who Lives in the Private Rented Sector' published in January 2013 by the British and Social Housing Foundation (BSHF). Additional input was sought from household surveys and the view of local letting agents. Paragraph 4.16 of the SHMA Update notes an increase in demand in rental property in King's Lynn and West Norfolk "due to the growth in household groups that typically look to reside in the tenure – young adults and migrant households." This indicates there could be a need to support build to rent development across the Borough.</p> |   |   |
| Gemma Clark- AONB Norfolk Coast Partnership | Support            | AONB Norfolk Coast Partnership support the policy   |   | <b>Support noted and appreciated</b>  |
| Richard Brown Koto Ltd                      | N/A                | Comments relate to Downham Market and not this policy   |   | <b>Consider in Downham Market Section</b>   |
| Richard Brown Elm Park Holdings             | Support            | <p>Policy LP26 is supported, but with the deletion of paragraph 2. Policy LP26 (1.a.) there is no need for the provision of "small" gaps which [small] should be deleted.</p>   | there is no need for the provision of "small" gaps which [small] should be delete | <b>Support acknowledged. Disagree with changes proposed.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a |

| Consultee  | Nature of Response | Summary  | Consultee Suggested Modification   | Officer Response / Proposed Action  |
|--|--------------------|--|--|---|
|  |                    |  |  | wide range of measures will be required   |
| Richard Brown<br>Elmside Ltd                                   | N/A                | Comments relate to Wisbech Fringe/Emneth and not this policy   |  | <b>Consider in relevant Section</b>   |
| Mr Robert Alston   | Support            | We support the sentiment of policy LP26 which permits development in rural villages where previously this has been restricted but consider that the need for sites having to be located adjacent to development boundaries is not in line with paragraph 78 of the NPPF. Paragraph 78 of the NPPF states that sustainable housing development in rural areas can help to support services in another village. This is not predicated on development boundaries   | Delete ref. to development boundary.<br>Delete ref. to Neighbourhood Plans | <b>Support acknowledged. Clarification around development boundaries needed.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. BC wishes to support Neighbourhood Plans   |
| Murdo Durrant<br>Parish Clerk Burnham<br>Thorpe Parish Council | Object             | 5. Policy 26 5.1. In tandem with the policy change to settlement development boundaries for Smaller Villages and Hamlets, and further increasing the likely random and unsuitable development which may be likely to be allowed by this Local Plan is the provision of Policy 26. This appears to give the opportunity for development outside the development boundaries of settlements - including smaller villages and hamlets. There does not appear to be any justification for this policy and its wording and intent would seem likely to give rise to significant speculative development applications. I would suggest that this policy is deleted and that no revision or alteration of it is necessary as it does not perform a useful or needful function. Where exception sites may come forward for social housing, they would not require this policy - or one like it - to support them. | Delete Policy  | <b>Disagree with suggestion, further explanation is however required.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and ensure these homes are actually delivered a wide range of measures will be required. Protection offered for areas in the |

| Consultee            | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action  |
|----------------------|--------------------|---|----------------------------------|---|
|                      |                    |   |                                  | AONB. Current policy DM3 allows for much of this to already take place in smaller villages and hamlets. LP26 represents allowing this to occur at higher order settlements and therefore more sustainable locations |
| Mr & Mrs D Blakemore | Support            | Support. Small scale development in smaller settlements prevents stagnation and contributes to organic growth of the settlements, with the ability to provide added character and vitality.   |                                  | <b>Agreed</b>   |
| Ken Hill Estate      | Support            | The policy is generally pragmatic and helpful to ensuring windfall housing sites can be brought forward outside of but adjacent to development limits. However, the in-principle restriction which prevents such development in AONBs is not considered valid and has the potential to disadvantage the future sustainability of some settlements, and lead to an in-balance in the delivery of windfall housing across the plan area. Settlements within the AONB have no lesser need for housing to support local services and the vitality of local communities and there is nothing to suggest that small scale development of this nature would be unacceptable in such settlements, if appropriately designed to reflect the AONB's special qualities. It is considered that the restriction on this form of development in AONBs should be removed and an additional criterion added stating: For settlements within the AONB, it must be demonstrated that development will not have an adverse impact on the qualities of the designated area. | See box to left                  | <b>Support acknowledge, however the BC affording weight and protection to AONB</b>  |
| Ms Sarah Greenall    | Object             | Policy 26. This seems to allow for development outside the development boundaries of settlements. Why? It will only encourage random and unsuitable development. What is the  | Delete Policy                    | <b>Disagree.</b> The policy is designed to provide a flexible framework for   |

| Consultee                               | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action   |
|---|--------------------|---|----------------------------------|--|
|   |                    | justification for this when there has been much talk of the more sensible brownfield sites?   |                                  | sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver a wide range of measures will be required. BC has a BF register and BF sites can come forward.                                   |
| Pigeon Investment Management Ltd        | Support            | Policy LP26 – Residential Development Adjacent to Existing Settlements 1.36 The inclusion of Policy LP26 is welcomed in that it gives greater flexibility to the interpretation of Policy LP04. Where this would also result in the best use of a site through increased densities then Policy LP26 should not limit development only to ‘small groups of dwellings’ or ‘the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary’. In the case of Pigeon’s site at Ingoldisthorpe, whilst it falls outside the settlement boundary it is well contained by existing development and could easily accommodate more than a small group of dwellings. Moreover, it does not form part of an existing small gap that would round off the existing development boundary. 1.37 Notwithstanding the above, Pigeon’s site at Ingoldisthorpe is clearly in a sustainable location, as part of a functional cluster with other higher order 13   Page settlements. Therefore, Policy LP26 should allow greater flexibility for sites like this to come forward where new homes would be near to services and would support villages to thrive. | See box to left                  | <b>Support Acknowledged, however Disagree with proposed changes.</b> The policy is designed to provide a flexible framework for sustainable development to take place in a sensitive manner. In order to meet our housing need in terms of supply and deliver. |
| Mr Adrian Lott-Parkers of Leicester Ltd | Support            | Policy LP 26 Residential Development Adjacent to Existing Settlements This policy is described in the Plan as being ‘designed to provide more modest levels of growth of an appropriate character, within all settlements, by identifying the key types of  | Remove AONB restriction          | <b>Support Acknowledged, however disagree with proposed changes.</b> The BC protecting AONB In line  |

| Consultee     | Nature of Response | Summary   | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|---------------|--------------------|---|---|--|
|               |                    | <p>development likely to be suitable, and enabling appropriate, small-scale development adjacent to existing development’. This is appropriate as it allows well-considered development beyond the Development Boundary consistent with the existing settlement’s needs and where development would contribute to the sustainability of the settlement. The criteria listed within the policy provide the necessary safeguards to ensure that development is appropriate and high quality (criteria 1) and would be modest in amount (criteria 2). We object however, to the exclusion of settlements within the AONB under criteria 3 of the policy. While the AONB is of national significance, this designation does not necessarily preclude appropriate development. AONBs are living and working landscapes and they too must be allowed to develop and adjust to remain viable and sustainable with appropriate and limited amounts of new development. The AONB includes several settlements and the policy would restrict the ability of those settlements to change and adapt as envisaged by the policy for all other settlements. The NPPF (paragraph 172) and polices in the Plan provide the necessary safeguards to ensure that development is well considered and appropriate, such as LP16 Design and Sustainable Development, LP 17 Environmental Assets, LP18 Environment, Design and Amenity. We therefore object and request that criteria 3 as it relates to the AONB be removed.</p> |   | <p>NPPF 172. The approach is supported by the Norfolk Coast Partnership</p>  |
| Amber REI Ltd | Support            | <p>2.14 Policy LP26 states that residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy where it involves: ➤ The sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; and ➤ The development is appropriate to the scale and character of the settlement and its surroundings; and ➤ Additional weight should be given to proposals for Custom and Self-Build development; and ➤ It will not fill a gap which provides</p>  | <p>Not convinced that Custom &amp; Self Build should be given additional weight</p> | <p><b>Support Acknowledged. Agree with summary but not suggested modification.</b> Government through NPPF and various legislation place focus upon Custom and Self Build Housing. BC is keen to</p> |



| Consultee               | Nature of Response | Summary   | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|-------------------------|--------------------|---|---|--|
|                         |                    | <p>a positive contribution to the street scene or views in/out of the locality. It goes on to state that in exceptional circumstances the development of a small group of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.</p> <p>2.15 The rationale behind this policy is supported and it is considered that residential development adjacent to existing buildings would assist in providing sufficient flexibility to support housing delivery across the plan period in sustainable locations on the edge of existing settlements.</p> |   | <p>adhere to this. Please see BC C&amp;SB Action Plan and BC HDT AP.</p>   |
| Charlie de Bono         | Support            | <p>We broadly support this policy As this more flexible approach to policy will encourage sustainable development in appropriate locations. Edge of settlement development is very much a traditional approach to settlement evolution. We are particularly supportive of ref 1c. where "additional weight will be given to proposals for Custom and Self-Build development", as this naturally leads more local-needs based solutions.</p>   | <p>Could be Stronger on Custom and Self Build and perhaps provide further information</p> | <p><b>Support noted. Supporting text should reference the Custom and Self Build Section of the Local Plan review</b></p>   |
| Mr Craig Barnes Gladman | Mixed              | <p>Policy LP26 relates to the development of housing within the open countryside. The policy enables development of small infill sites but excludes locations with Neighbourhood Plans. Gladman queries the differentiation made in the policy between areas with Neighbourhood Plans and those without. The application of this policy may result in Neighbourhood Plans which promote/permit a lower amount of development than the Local Plan which runs counter the National Planning Policy. No differentiation should therefore be made.</p>  | <p>Delete Policy</p>  | <p><b>Disagree.</b> BC believe this to be a measured approach. Unlikely that given the basic conditions and NPPF that Neighbourhood Plans will provide less growth than sort. Explain in supporting text the protection for Neighbourhood Plans which are Made</p> |

## **Draft Policy – South Wootton & E3.1 South Wootton Hall 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=s1542882759454#section-s1542882759454>

&

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1545126690436#section-s1545126690436>

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

- In the policy make specific reference to Grade II\* Church of St Mary, its setting and views of the asset, as recommend by Historic England. This could be covered within the heritage assets statement which is already required by the policy. However, it would be appropriate to mention this upfront through the relevant policy item
- South Wootton Parish Council are seeking to review their Neighbourhood Plan in the near future – This would be both welcomed and supported by the Borough Council
- Local community resistant to Knights Hill SADMP Allocation. This will be covered in some detail within the Knights Hill section of the Local Plan review
- Local community not keen on any major future development in South Wootton or North Wootton. The Local Plan review is not seeking to propose/make any further allocations within the Woottons
- Norfolk Property Services (NPS) are looking to bring forward the Norfolk County Council (NCC) portion of the Hall Lane allocation. This is welcomed.
- Support is offered from the Environment Agency for existing policy in terms of the flood risk approach.
- Housing numbers will be considered in the relevant section of the Local Plan review.
- The BC needs to meet its Local Housing Need, ensure the Local Plan is 'sound', have more than the minimum required 5 years' worth of housing Land supply and attempt to pass the Housing Delivery Test
- The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review.
- The BC maintains a Brownfield Register, currently all of these sites are allocated or have planning permission so can potentially come forward

**Policy Recommendation:**

**Policy E3.1 – Hall Lane, South Wootton**

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7.....

f. a heritage assets assessment (to include archaeology), with review of the submitted information, and relevant on-site investigations. 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, this should be fully considered in the design scheme of the development.

.....

**The rest of the policy to remain the same**

**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 |
| <b>LPr E3.1</b>   | <b>+</b>                   | <b>+/x</b>         | <b>+</b>           | <b>x</b>                  | <b>+/x</b> | <b>#</b> | <b>++</b>            | <b>+/x</b>          | <b>#</b>            | <b>O</b>                          | <b>+/#</b>     |
| <b>SADMP E3.1</b> | <b>+</b>                   | <b>+/x</b>         | <b>+</b>           | <b>x</b>                  | <b>+/x</b> | <b>?</b> | <b>++</b>            | <b>+/x</b>          | <b>?</b>            | <b>O</b>                          | <b>N/A</b>     |

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

The additional information added to the policy item provides detail and clarity upfront and this along with the works already carried by the site’s agents/developers in ascertaining outline planning permission result in the score for ‘Heritage’ changing from a ‘?’ to a ‘#’. Likewise because of this work more is known about the impact upon the ‘Natural Environment’ and the score is amending accordingly. In terms of the new indicator ‘Climate Change’ a score of ‘+/#’ is awarded as South Wootton is classed as a sustainable location which is reasonably related to King’s Lynn and therefore offers many of the service and facilities required for daily life. There are is also the opportunity for future residents to use public transport in the form of buses or the train station. The policy itself requires the development to provide, landscaping, open space, enhanced recreational provision, a package of habitat protection measures, a network of pedestrian routes which link to the wider network, possible alternative green space, the layout should facilities cycling and walking, including linking to the national cycle route close by and the future coastal path, and SuD’s. However the design scheme and design of the individual dwellings will clearly have an impact.

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**Appendix 1: Summary of Comments & Suggested Response:**

| Consultee                                      | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action   |
|--|--------------------|--|----------------------------------|--|
| Mrs T Cornwall<br>South Wootton Parish Council | Mixed              | <p>South Wootton Parish Council wishes to question issues raised in the Local Plan Review to 2036. With regard to The Woottons, 1) The review states that the Local Plan does not seek to make a further allocation at South Wootton. 2) A map in the 2011 Core Strategy document shows a red arrow pointing from the west of Hall Lane/ Nursery Lane developments to indicate potential future development towards North Wootton. We have been informed that the red arrow has been removed, which suggests that there are no plans for future development. 3) The LP review states that North Wootton was included as one of the areas to accommodate the major housing growth around King' Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, the above statements appear to be contradicted in the LP review, in section 9.5.1E 3.1, item 2b, which proposes "a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future." Note, the Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary Clarification is needed on the location of this proposed road link and what it really means for any development towards North Wootton. It is unfortunate that the three major locations for new development in South Wootton have been on green field sites. In future, priority should be given to available brown field sites. The Borough Council's Brownfield Register shows there are 51 sites totalling 87 hectares with the potential for 2,085 homes, which is more than the 1376 needing to be allocated during the Local Plan Review process. These sites must be made use of first. In addition, there is a need for truly affordable housing, which should be given</p> |                                  | <p><b>Noted.</b> The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at some time in the future so ensuing that the current policy and planning applications do not sterilise land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning permissions, so in effect development can take place. The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this</p> |

| Consultee | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action  |
|-----------|--------------------|--|----------------------------------|---|
|           |                    | <p>priority on the brown field sites especially those close to town centres. We note that the words “at least” for the number of houses allocated to preferred sites is retained in the Local Plan Review. This should be removed as it transfers control from the Borough Council into the hands of the developers allowing them free rein on the number of properties at each allocated site, regardless of sustainability. A way around this is for developers to be required to build in phases and only be allowed to move to a new phase when the previous phase has been completed and the properties sold. In the meantime, the non-developed parts could remain on a reserve list, thus protecting valuable countryside. Despite the Borough Council rejection of the Camland development (subject to possible review), the already approved developments for 660 new houses in South Wootton will contribute to significantly increased traffic congestion along the main route from Knight’s Hill into the Docks and the centre of King’ Lynn. Discounting the Camland development, there will be an additional new junction (for Clayland) and a new roundabout (for Larkfleet), both of which will have a negative impact on traffic flows. In 2012, Bidwells traffic report indicated that the junctions on to Grimston Road/ Low Road/ Edward Benefer Way were either over capacity (Langley Road) or close to capacity. They concluded that a sustainable level of development would be no more than 425 properties at Knight’s Hill and no more than 225 properties west of Hall lane/Nursery Lane. The combined total has already been exceeded with the approval of the Larkfleet, Bowbridge, Clayland and Hopkins &amp; Moore developments. This endorses the conclusion that the Camland development should be completely rejected and no further development be planned for South Wootton. Indeed, Camland’s own traffic report stated that Grimston Road would be over capacity by 2026 without any</p> |                                  | <p>was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Plan review. We are pleased to learn that the Parish Council intends to review their Neighbourhood Plans and look forward to supporting this process and working collaboratively to achieve this.</p> |

| Consultee                                      | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action   |
|--|--------------------|---|----------------------------------|--|
|  |                    | additional new housing.   |                                  |  |
| Mrs T Cornwall<br>South Wootton Parish Council | Object             | CPRE Pledge.  | All further allocations removed  | <b>Noted.</b> 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 & Mrs D Price                              |                    | My wife and I wish to make the following comments on the LPR to 2036 document with regard to the impact on South Wootton. We are pleased to note the review states that there are no plans for future development in South Wootton. However, we also note in section 9.5 1E 3.1, item 2b a reference to 'a link road on the Larkfleet/Bowbridge site's northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. This suggests that there could be future development in South Wootton, contrary to the earlier statement of no plans for future development. Clarification is required! With planning approvals already given to the Larkfleet, Bowbridge, Clayland and Hopkins & Moore developments, these amount to 660 new properties (a 40% increase in size of the village). We were pleased to see that the Camland development ( a further 600 properties) has be rejected by the Borough Council. Should the developer |                                  | <b>Noted.</b> The 'at least' wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an |

| Consultee | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action  |
|-----------|--------------------|---|----------------------------------|---|
|           |                    | <p>appeal, we would trust the Borough Council will continue to oppose and seek withdrawal of this excessive development. Sadly, all off the developments for South Wootton are on green field sites. Priority should be given to brown field sites in future. In the Borough there are apparently, 51 brown field sites with the potential for over 2000 homes, which is more than required allocation in the LPR. Affordable housing should be given priority on the brown field sites, especially those close to town centres. In the LPR document, we note that the words “at least” is retained for the number of houses allocated to preferred sites. Surely. this should be removed as it effectively passes control to developers, regardless of sustainability. The developers should be required to build in phases and only move to a new phase when the initial phase has been completed and the properties sold. Non-developed parts could be held in reserve, thus protecting valuable countryside. The already approved developments in South Wootton will contribute significantly to the traffic congestion along the main route from Knight’s Hill into the Docks and the centre of King’s Lynn. Much evidence on the traffic problems was presented at BC’s Planning meeting discussing the Camland development and probably was a major factor in rejecting the application. Camland have stated in its own Traffic Report that Grimston Road would be overcapacity by 2026. The proposed Camland development must be stopped to avoid additional traffic congestion problems in the future. Traffic congestion raises other issues and consideration to the effect of a) car parking availability in King’s Lynn and at the railway station and b) on Air Quality, both in the local AQMA zones and at other relevant locations. We think that South Wootton must be protected from any further land allocations for housing in the future. Enough is enough!</p> |                                  | <p>application refused by the BC Planning Committee. The traffic and associated issues raised will be covered by the relevant section within the Local Plan review. King’s Lynn Transport Strategy and associated studies</p> |



| Consultee      | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action  |
|----------------|--------------------|--|----------------------------------|---|
| Mr John Marrow |                    | <p>the Larkfleet Bowbridge developments are already almost double the original agreed 300 homes over the whole area. this is not in keeping with the surrounding area .Also to increase it further as a certain vested interest has virtual insisted .THIS IS NOT SUSTAINABLE. Consideration must be given to the infrastructure and environmental impact. No minor tinkering with the road system is going to ease the virtual gridlocked situation, the developers must be made to make a major large and useful contribution. The impact on Air Quality will also be serious and must not be overlooked by the borough planners. 2) the words "at least" must be removed from the the whole document otherwise this will open the floodgates to the developers and land agents GREED. It is time for the planners to listen and act accordingly to the local residents There is plenty of room at the major Walsoken site to compensate for the required number of homes 3) The current rate of build is twice what is required especially since the Nation Context has reduced since the core strategy and ldf therefore the number required is not nearly so many a large number of which can be covered by the use of current brownfield sites and areas above shops and offices that are empty in the borough 4) It is very unlikely that the borough would be deemed not suitable to remain a planning authority in the light of the Nation Context. this is based on reliable information from Westminster and Parish Councils organisation 5) In the event of nature reserves and ponds ,lakes ;Which should be included in all developments;are involved these must be properly constructed so that they work and are of benefit to the the environment and WILDLIFE in particular Not just a hole left in the ground which floods when it rains and dries out when weather is fine. This will be at the developers expense and Overseen by Parish councils with guidance from organisations such WWT, RSPB,(Wildlife trusts)</p> |                                  | <p><b>Noted.</b> The site is allocated by the SADMP and the majority benefits from outline planning permission. The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. Housing numbers will be reviewed in the relevant section of the Local Plan review. The Knights Hill allocation will most likely be removed from the plan given its refusal at planning committee, however please see that chapter of the Plan.</p> |

| Consultee                       | Nature of Response | Summary  | Consultee Suggested Modification                                       | Officer Response / Proposed Action                        |
|---------------------------------|--------------------|--|--|---|
|                                 |                    | <p>NWT. This should be done by a parish subcommittee including local people with local knowledge as happened with the Neighbourhood Plans. 6) the additional 15% to provide flexibility is not required. as over supply is already meeting requirements. 7) To return to the South Wootton developments the Knights Hill development is no longer required and must be stricken from the LDF also the Number of homes allowed at the Larkfleet and Bowbridge sites must be reduced to a sustainable level: NO MORE THAN a density to match the surrounding area approx 250 homes over the whole area; This is because there are the two additional sites in South Wootton producing an additional almost 80 dwellings which are not yet built or as in the case of Nursery Lane are not selling 8) Overdevelopment is not acceptable and if this continues it will bring the borough into dis repute and the planning dept of the borough and the planning inspectorate must pay more attention to local situations such as Infrastructure impact, air quality impact environmental impact and the catatrophic impact on wildlife and the countryside. In conclusion please let common sense prevail not lunatic crazed overdevelopment At least the review shows some sense which it should have done in the fist place was to build in and therefore enhance villages so saving local post offices shops and amenities This is why the Core Strategy and Local Development Framework were FLAWED from day one unless the large estate sites such as South Wootton West Winch and others are reduced to reasonable size, the numbers that were put forward by the Parish Councils, which match local surrounding densities.</p> |  |   |
| Debbie Mack<br>Historic England | Object             | Object - 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   | Make reference to the church and views of the church within the policy | <b>Noted &amp; Agreed.</b> The site already benefits from |

| Consultee                                  | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action  |
|--|--------------------|--|----------------------------------|---|
|  |                    | 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.                     |                                  | outline planning permission. It is likely that reserved matters will be considered before the Local Plan review is adopted. However for completeness this modification should be made |
| Mrs Elizabeth Mugova<br>Environment Agency | Support            | 1.e. ...To include public open space for recreation and visual amenity on 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. |                                  | <b>Support Noted and Agreed</b>   |
| Richard Smith<br>NPS Group                 | Support            | NPS support the proposed allocation. NPS Property Consultants, as agent for Norfolk County Council who own part of the land will continue to work with other landowners and stakeholders to deliver development on this site   |                                  | <b>Support Noted and Agreed</b>   |

## **Draft Policy – North Wootton**

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

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759456#section-s1542882759456>

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

- Seeking assurance that no major development is planned for North Wootton – the Local Plan review is not seeking to propose this. The South Wootton Hall Lane Allocation should not sterilise the land to north for ever more. Further details of the ‘Link Road’ will be provided through the detailed planning permissions.
- Concentration for development should be on Brownfield sites – The Borough Council has published and maintained a Brownfield Register the majority of sites listed have some form of planning permission and so should be able to progress to being delivered. The plan seeks to allocate a balanced range of sites including Brownfield Sites. These sites can pose significant challenges in bringing forward through to completion, however the Borough Council has/and is seeking to bring a number forward such as NORA and the remaining land within the site. It is recognised that the nature of the Borough being predominantly rural will involve the development of Greenfield sites particularly if the vitality/sustainability of rural areas is to be retained/increased. Many brownfield sites have viability and delivery issues and may not be capable of meeting the requirements set out within the NPPF to be classed as a deliverable site, due to these constraints.
- Removal of ‘at least’ – most of the SADMP sites already have planning permission (approx. 80%). This was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements in case some allocations do not come forward as originally envisaged, and therefore is retained within the Local Plan review.
- Removal of the Knights Hill Allocation – this is considered in some detail in the Knights Hill section
- Question Housing Numbers/Targets – These are now prescribed by Government, through the standard method for calculating Local Housing Need (LHN) as part of the NPPF/PPG, if CPRE believe that they are unrealistic or unfounded than CPRE could take this up with Government directly. The Borough Council needs to be shown to be meeting its LHN, have an up-to-date Local Plan which meets the tests of ‘soundness’, have more than minimum required 5 years’ worth of housing land supply and attempt to pass the Housing Delivery Test. As part of the review process housing numbers will be considered in some detail within the relevant chapter.
- Railway Station and Transport issues – The car parking and air quality issues will be covered in a future Borough Council Car Parking Strategy, the King’s Lynn Transport Study and Strategy and the relevant sections of the Local Plan review.

**Conclusion:**

- **No change to the North Wootton Chapter** - No allocations were proposed by the current Local Plan for North Wootton and the Local Plan review proposes the same position.

**Appendix 1: Summary of Comments & Suggested Response:**

| Consultee   | Nature of Response | Summary  | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|---|--------------------|--|---|--|
| Mrs Rachel Curtis<br>North Wootton Parish Council | Object             | CPRE Pledge.   | All further allocations removed until such time that those already allocated have come forward. | <b>Noted.</b> Housing numbers are prescribed by Government if they are unrealistic or unfounded than CPRE should take this up with Government. We need to be shown to meeting the housing need, ensuing the Local Plan is 'Sound', that we in excess of minimum 5 years of housing land supply and do our level best to pass the housing delivery tests if the Borough Council is retain planning control. |
| Mrs Rachel Curtis<br>North Wootton Parish Council | Object             | The LP review states Para 9.7 that North Wootton was included as one of the areas to accommodate the major housing growth around King's Lynn but no suitable sites were identified, instead within the North Wootton boundary there may be some scope for infilling. However, there is concern that this is contradicted in the LP review, in section 9.5.1E 3.1, item 2b which proposes 'a road link to the site's (Larkfleet/Bowbridge) northern boundary to avoid prejudicing the potential for further development beyond at some point in the future'. The Bowbridge layout shows an area of open space with surface water drainage ponds on its northern boundary – therefore clarification is needed on the location of this potential road link and how this may influence any potential development towards North Wootton. It is questionable where the local need is | Remove Knights Hill from the Plan.  | <b>Noted.</b> The details of the Link Road will be provided by both the policy and future planning applications, noting that the majority of the Hall Lane site has outline planning permission. Whilst no land is proposed for allocation at North Wootton, we didn't want to preclude development potentially occurring at   |

| Consultee | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action  |
|-----------|--------------------|---|----------------------------------|---|
|           |                    | <p>for the number of houses allocated for the local area. The Local Plan Review (LPR) makes reference Para 9.4.1.44 stating “new employment allocations are needed to provide job opportunities for residents in and around to King’s Lynn to support the growth aspirations for the town.” However, large companies within the town have recently closed e.g. Chalcroft and CITB due to close in 2019. Will these new homes be sought by people who intend to commute to Cambridge or Norwich for their employment? King’s Lynn railway station car park is inadequate to cope with demands and the station itself is situated in one of the most congested highway links with extremely high vehicle emissions. One of the biggest issues which concerns our Parishioners is the impact on traffic that new development causes, when it congests, it negatively impacts local economic performance and, importantly, air quality. In its consideration of highways suitability for development at Knights Hill, Norfolk County Councils concerns appeared to be that of fatalities and accidents with absolutely no regard for traffic congestion and the resultant damage to health, the environment and our economy. Continued use of empty properties and brownfield sites is essential. Under local press articles it states that 2,000 new homes could be built in West Norfolk alone if the Boroughs available brownfield sites were developed. Much more time and effort to bring these sites forward has to be the preferred and thereby avoiding the easy alternative of absorbing greenfield and agricultural land. Brownfield town centre sites do not have the reliance on transport and will help reduce pressure on the areas emissions and their use avoids the damaging effect to highways and the loss of valuable green and agricultural heritage land. Any village developments at all should gradually evolve in tandem with sustainable service and facilities. The words ‘at least’ before the number of dwellings allocated to</p> |                                  | <p>some time in the future so ensuing that the current policy and planning applications do not sterilise land should it ever be required in the future. Those sites on the brownfield register currently are allocated or already have planning permissions, so in effect development can take place. The ‘at least’ wording is retained as the majority (80%) of sites already have some form of planning permission, this was felt by the SADMP Inspector a very important inclusion within the Plan to ensure the BC meets its housing requirements, and therefore is retained within the review. The Knights Hill development will likely be removed from the review having had an application refused by the BC Planning Committee, Please see the Knights Hill Chapter for details. The</p> |

| Consultee | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action  |
|-----------|--------------------|--|----------------------------------|---|
|           |                    | <p>preferred sites is retained in the Local Plan Review and should be removed. Developers interpret this as an indication to cram in more dwellings, to the cost of the Woottons this happened with the Larkfleet and Bowbridge developments. Parish councils should have more say in the maximum number of dwellings in their area and the figure registered as the maximum number of homes. Parishes and their residents have the local knowledge to assess such levels. Para 9.6.1 E4.1 - Following the recent unanimous rejection of outline planning permission for the proposed development at Knights Hill, this is still included in the Local Plan for future housing development against the clear wish of all local communities. The draft Local Plan contains many policies that warrant our full support. In particular it is reassuring to note that it is Council policy to avoid any future development encroaching on the countryside by limiting urban and village sprawl, by keeping development in rural areas to more modest levels that will meet local needs whilst maintaining the vitality of settlements. Furthermore, it is encouraging that the Council are aware of the inadequate infrastructure in many parts of the Borough that would be overwhelmed by any new largescale development. It is also welcomed that the Council wish to maintain the significant tourist appeal of our area due to our unique environmental assets and our historic built environment. To damage our village structure, community and way of life would be catastrophic to the local economy that is so reliant on tourism. Any development of the proposed site at Knights Hill would contravene many clearly stated Council policies. In addition, with its reliance on car transport, such a development would bring a considerable increase in pollution, reducing the already poor air quality in the town centre, and would add further disruption to our already over-congested roads. Therefore the Knights Hill site should be deleted from the Local</p> |                                  | <p>traffic and associated issues raised will be covered by the relevant section within the Local Plan review.</p> |



| Consultee | Nature of Response | Summary | Consultee Suggested Modification | Officer Response / Proposed Action |
|-----------|--------------------|---------|----------------------------------|------------------------------------|
|           |                    | Plan.   |                                  |                                    |

**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 |                | +  | -                          |
| <b>LP35</b>          | -             | +/- | +/- | +/- | +   | + | + | +/- | +/- | O  | +  | +  | +  | ++ | ++ | +  | +  | O  | +  | ++ | +20            | -7 | Likely Positive Effect +13 |
| <b>Draft LP35</b>    | -             | +/- | +/- | +/- | +   | + | + | +/- | +/- | O  | +  | +  | +  | ++ | ++ | +  | +  | O  | +  | ++ | +20            | -7 | Likely Positive Effect +13 |
| <b>CS04</b>          | -             | +/- | +/- | +/- | +   | + | + | +   | +/- | O  | +  | +  | +  | ++ | ++ | +  | +  | O  | +  | ++ | +20            | -7 | Likely Positive Effect +13 |
| <b>No Policy</b>     | -             | +/- | +/- | +/- | +/- | + | + | 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 Sustainably Appraisal scoring remains the same between the draft policy and the proposed one.

**Appendix 1: Summary of Comments & Suggested Response:**

| Consultee                        | Nature of Response | Summary   | Consultee Suggested Modification                              | Officer Response / Proposed Action  |
|----------------------------------|--------------------|---|---|---|
| Mr J Maxey<br>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 determination of scale will allow that scale to be debated at Borough level, and subsequent decisions to be judged against that</p> | Make it clear if a neighbourhood plan is being prepared/made. | <p><b>Agree with suggested modification but not the risks.</b> 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> |

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| Consultee                     | Nature of Response | Summary  | Consultee Suggested Modification   | Officer Response / Proposed Action   |
|-------------------------------|--------------------|--|--|--|
|                               |                    | 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                  |  | <b>Support Noted.</b> 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                    | <b>Noted.</b> 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  |  | <b>Support Noted</b>   |
| 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 allocated in the Neighbourhood plan. This is contrary to NPPF 2019 para 20 which states that strategic policies should make provision  | State the specific allocation scale within this paragraph and identify where | <b>Modify policy to include growth numbers.</b> NPPF para 20. Says that <i>‘Strategic polices should set</i>   |

| Consultee   | Nature of Response | Summary  | Consultee Suggested Modification   | Officer Response / Proposed Action  |
|---|--------------------|--|--|---|
|   |                    | for housing. Delegating such allocation to a neighbourhood Plan is contrary to NPPF.   | strategically the 320 additional allocation should be  | <i>out an overall strategy for the pattern scale and quality of development...</i><br>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<br>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'.  | <b>Noted, Agreed, make the Modification suggested</b>   |
| Debbie Mack<br>Historic England   | Support            | Support - We very much welcome the reference to heritage assets and local building materials   |  | <b>Support Noted &amp; Agreed</b>   |
| 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 approximately 21.27 hectares in size (Call for Sites ref: 28- 11- 20164288). The site has the potential to accommodate around 500 | Make provision for more housing at Downham Market. Chiefly the allocation of the site proposed by and owned by the Ryston Estate | <b>Noted.</b> 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  |

| Consultee                               | Nature of Response | Summary  | Consultee Suggested Modification   | Officer Response / Proposed Action   |
|---|--------------------|--|--|--|
|   |                    | <p>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.</p> |  | <p>relevant section of the Local Plan review.</p>  |
| Mr R Riches & Barker Bros. Builders Ltd | Object             | <p>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</p>  | <p>Allocate the site they have proposed</p>  | <p><b>Noted.</b> 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.</p> |
| Mr Kelvin Loveday                       | mixed              | <p>Para. 10.2.3 - This paragraph 'sugar coats' Downham's situation.</p>  | <p>There are a range of local employment opportunities that struggle to meet the needs of the town which consequently has become a 'dormitory'</p> | <p><b>Noted.</b> The employment allocation within The Local Plan is close to this area. Proposals for the use of other land near here and uses on the River can be proposed.</p>   |



| Consultee         | Nature of Response | Summary   | Consultee Suggested Modification   | Officer Response / Proposed Action   |
|-------------------|--------------------|---|--|--|
|                   |                    |   | 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.   |  |
| 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   | <b>Noted.</b> 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 residents and the surrounding rural | <b>Noted.</b> 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 financial / political uncertainty. The current |

| Consultee | Nature of Response | Summary | Consultee Suggested Modification   | Officer Response / Proposed Action  |
|-----------|--------------------|---------|--|---|
|           |                    |         | <p>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>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<br>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. | <b>Noted.</b> 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<br>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<br>Development should conserve and where appropriate enhance heritage assets and their settings including the Downham Market Conservation Area and listed buildings | <b>Noted &amp; Agreed</b>          |
| Elizabeth Mugova<br>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   | <b>Noted &amp; Agreed</b>          |

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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.

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## 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 |
| <b>LPr F1.2</b>   | <b>O</b>                   | <b>+</b>           | <b>++</b>          | <b>O</b>                  | <b>x</b>   | <b>#</b> | <b>+</b>             | <b>O</b>            | <b>O</b>            | <b>+</b>                          | <b>#</b>       |
| <b>SADMP F1.2</b> | <b>O</b>                   | <b>+</b>           | <b>++</b>          | <b>O</b>                  | <b>x</b>   | <b>O</b> | <b>+</b>             | <b>O</b>            | <b>O</b>            | <b>+</b>                          | <b>N/A</b>     |

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 |
| <b>LPr F1.3</b>   | <b>+</b>                   | <b>+</b>           | <b>O</b>           | <b>x</b>                  | <b>+</b>   | <b>#</b> | <b>+</b>             | <b>#</b>            | <b>O</b>            | <b>#</b>                          | <b>+/#</b>     |
| <b>SADMP E1.3</b> | <b>+</b>                   | <b>+</b>           | <b>O</b>           | <b>x</b>                  | <b>+</b>   | <b>O</b> | <b>+</b>             | <b>#</b>            | <b>O</b>            | <b>#</b>                          | <b>N/A</b>     |

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<br>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  |                                  | <b>Noted &amp; Agreed</b>  |
| 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. |                                  | <b>Support Acknowledged.</b><br>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:<br>f. Submission of an Environmental Statement that satisfies Norfolk   | See box to the left              | <b>Noted.</b> 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<br>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 | <b>Agreed – make modification to supporting text.</b> 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;"<br>....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 .<br>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.        | <b>Disagree.</b> The CIL was established through consultation and examination via an Independent inspector:<br><a href="https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination">https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination</a> |
| 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                                 | <b>State population.</b> 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. <a href="https://www.norfolkinsight.org.uk/population/report/view/e55f083f354c46b9bf046e2d7f202abb/E58000974/">https://www.norfolkinsight.org.uk/population/report/view/e55f083f354c46b9bf046e2d7f202abb/E58000974/</a><br/>The CIL was established through consultation and examination via an Independent inspector: <a href="https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination">https://www.west-norfolk.gov.uk/info/20199/community_infrastructure_levy/44/cil_examination</a></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 |
| <b>LPr F1.4</b>   | <b>++</b>                  | <b>+</b>           | <b>O</b>           | <b>x</b>                  | <b>+</b>   | <b>O</b> | <b>+</b>             | <b>#</b>            | <b>O</b>            | <b>#</b>                          | <b>+/#</b>     |
| <b>SADMP E1.4</b> | <b>++</b>                  | <b>+</b>           | <b>O</b>           | <b>x</b>                  | <b>+</b>   | <b>O</b> | <b>+</b>             | <b>#</b>            | <b>O</b>            | <b>#</b>                          | <b>N/A</b>     |

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.

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**Summary of Comments & Suggested Response:**

| Consultee                           | Nature of Response | Summary  | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|-------------------------------------|--------------------|--|---|--|
| Debbie Mack<br>Historic England     | Support            | Support - We welcome the requirement for an archaeological assessment of this site   |   | <b>Noted &amp; Agreed</b>  |
| 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   | <b>Noted</b>   |
| Mr John Maxey<br>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.<br>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 | <b>Support Acknowledged and further points Noted.</b><br>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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