

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>

Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Mr J Maxey Maxey Grounds & Co	Suggests	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	Make it clear if a neighbourhood plan is being prepared/made.	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

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		<p>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 scale on a local basis</p>		<p>provide communities preparing a neighbourhood plan with indicative figures to work to for housing allocation purposes.</p>
Richard Brown Elmside Limited	Support	<p>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</p>		<p>Noted. The site is allocated and benefits from outline planning permission.</p>
Richard Brown Koto Limited	Object	<p>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”.</p>	<p>Allocate further land proposed for housing and mixed uses</p>	<p>Noted. There is site allocated in this vicinity, in the same ownership, which benefits from outline planning permission for 300 homes. It would be great if this development did indeed progress and was ultimately built out. Downham Market Town Council are in the process of preparing a Neighbourhood Plan and many of the planning decisions/directions will be</p>

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				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		Noted
Mr J Maxey	Objects	There is no stated scale of growth for Downham Market within the settlement chapter. LP01 implies 710 with 320 of these to be allocated in the Neighbourhood plan. This is contrary to NPPF 2019 para 20 which states that strategic policies should make provision for housing. Delegating such allocation to a neighbourhood Plan is contrary to NPPF.	State the specific allocation scale within this paragraph and identify where strategically the 320 additional allocation should be	NPPF para 20. Says that <i>'Strategic policies should set out an overall strategy for the pattern scale and quality of development...'</i> This is what the Local Plan review does, However this could be included within the policy. The exact location of future allocations (if required) will be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed
Debbie Mack Historic England	Object	Object - We welcome the reference to the built and historic environment at criterion 3 of this policy. We suggest replacing the word respect with conserve, more in line with the terminology of the NPPF.	Replace the word 'respect' with 'conserve'.	Noted, Agreed, make the Modification suggested.
Debbie Mack Historic England	Support	Support - We very much welcome the reference to heritage assets and local building materials		Noted & Agreed
Strutt & Parker on behalf of the Pratt	Object	Resubmission I am writing on behalf of our clients, The Trustees of the Ryston 1984 Trust, who have instructed Strutt & Parker to	Make provision for more housing at	The exact location of future allocations (if required) will

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Estates, Trustees of Ryston Estate		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 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.	Downham Market. Chiefly the allocation of the site proposed by and owned by the Ryston Estate	be for the Downham Market Town Council through their Neighbourhood Plan to decide. Housing numbers will be reviewed.
Mr R Riches & Barker Bros. Builders Ltd	Object	HEELA Ref H082 Site No: 560 The site edged red on the attached plan is some 2.69ha, and is surrounded by existing housing, and the town cemetery, and is close to the town centre, and its development can provide some 50 dwellings at low density together with open space. See attached document for more details	Allocate the site they have proposed	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.
Mr Kelvin Loveday	mixed	Para. 10.2.3 - This paragraph 'sugar coats' Downham's situation.	There are a range of local employment opportunities that	Noted. The employment allocation within The Local Plan is close to this area.

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			struggle to meet the needs of the town which consequently has become a 'dormitory' town. The town's historic industrial and trading links based on the River Great Ouse and the Relief Channel have declined. Now these watercourses support very limited leisure uses. This represents a huge, untapped opportunity for local commerce and employment.	Proposals for the use of other land near here and uses on the River can be proposed.
Mr Kelvin Loveday	Objects	Para. 10.2.2 - A limited bus service links the town to its hinterland	A limited bus service links the town to its hinterland	Noted.
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	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,

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			<p>consultation in 2013. Increasingly the local residents and the surrounding rural communities look to other towns to meet their needs. Many local school pupils travel away from the town for their education. Home education figures for the area are sky rocketing. The town centre has reached its capacity to absorb traffic. Health care services are overstretched.</p>	<p>including the raise of online shopping to financial / political uncertainty. The current system advocated by Government revolves around the provision of housing and associated infrastructure.</p>

Consideration of Issues:

- 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 particularly pessimistic view of the town

Conclusion:

- **The link between the Local Plan review and Neighbourhood Plan to be made clear**
- **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.**

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 and families will be encouraged.
 - d. improving the arts and culture offer; and
 - e. promoting the town's role as a wider visitor centre.
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 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 the Downham Market Town Council and local community in the preparation of their Neighbourhood Plan, and subsequent reviews.

Sustainability Appraisal

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

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.