

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

**Watlington**

## 1. Draft Policies – Watlington

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

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

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

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

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

## 2. Summary of Responses and the Issues Raised:

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

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

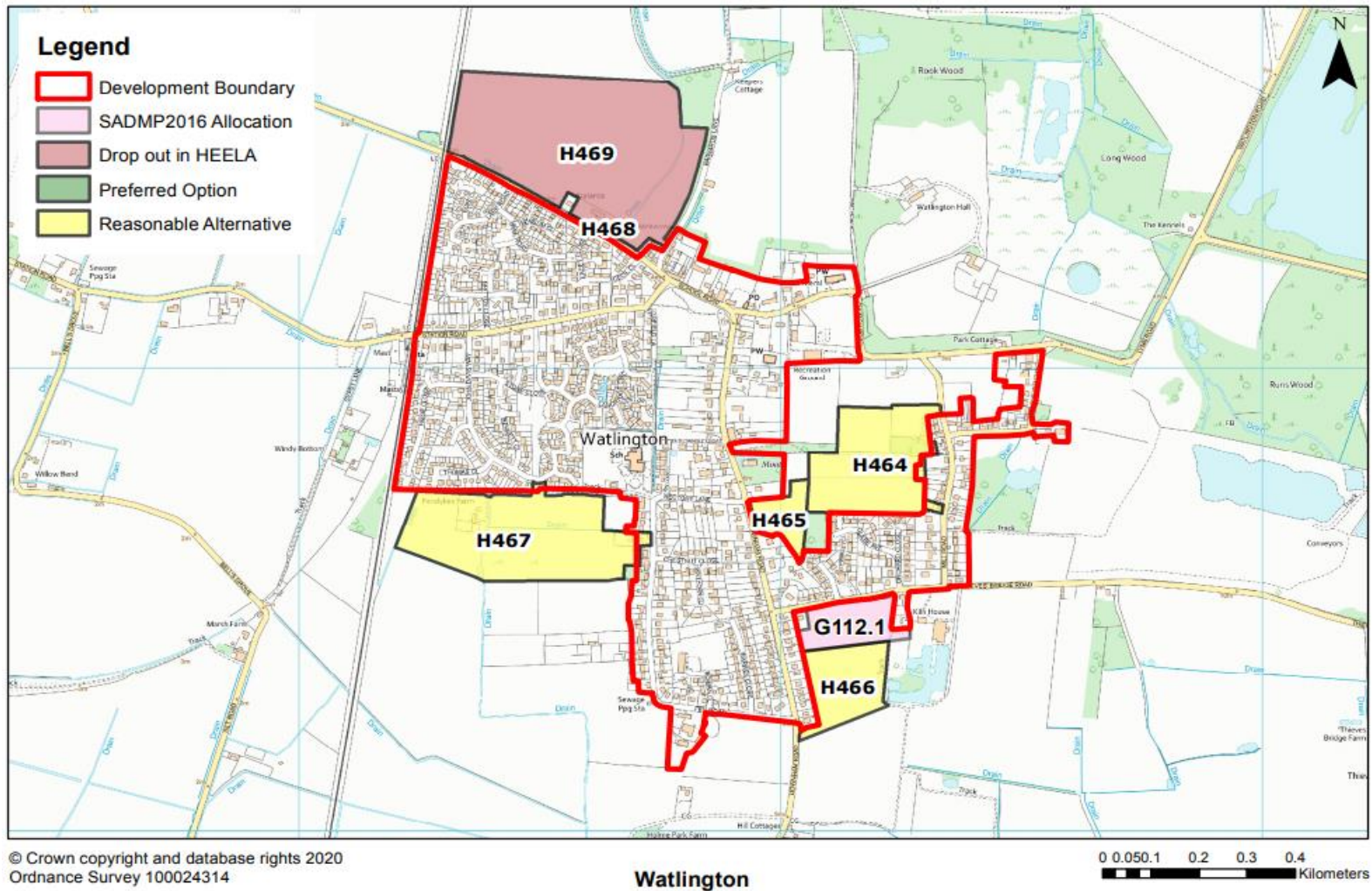
And; Appendix 2 which provides a summary of 12 representations received which related to Watlington but not specifically WAT1.

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

### 3. Conclusions & Recommendation

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

# Watlington - Sustainability Appraisal – Map



## Watlington – Sustainability Appraisal – Site Scoring Matrix

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

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

### Watlington- Sustainability Appraisal – Site Commentary

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

### **SADMP Allocation**

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

### **Watlington - Sustainability Appraisal – Site Discussion**

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

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

### **Watlington – Sustainability Appraisal – Site Conclusion**

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

## **Watlington**

### **Growth Key Rural Service Centre**

#### **Description**

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

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

#### **Strategic Context**

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

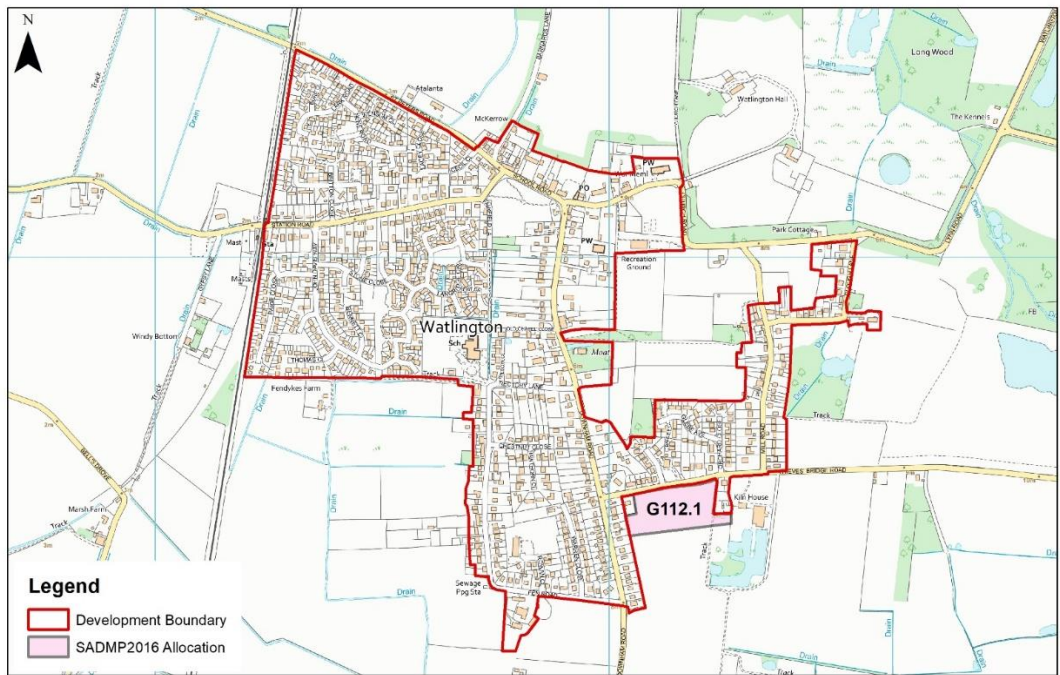
#### **Neighbourhood Plan**

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

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

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

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



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 Ordnance Survey 100024314

Watlington

0 0.05 0.1 0.2 0.3 0.4  
 Kilometers

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

### **Site Allocation**

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

To the east of the site is further residential development in the form of bungalows along Downham Road, and to the west are two large detached properties with substantial gardens, one has associated farm buildings and ponds/water storage.

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

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

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

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

### **Site Description and Justification**

The site comprises of Grade 2 agricultural land and has defined boundaries in the form of hedgerows and trees. Watlington comprises mostly higher-grade agricultural land, limiting the ability to choose lower grade land.

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

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

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

## **Appendix 1: Summary Comments from Local Community**

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

### **Natural Environment**

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

### **Pedestrians & Highways**

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

### **Flood Risk**

- Loss of drainage
- Loss of flood prevention

### **Infrastructure**

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

### **Heritage**

- Impact upon the historic environment – listed buildings and moat

### **Landscape & Amenity**

- New development proposed not in keeping with local area



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

### **Alternative Suggestions for Development**

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

### **Site Planning**

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

### **General /Other:**

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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