

Draft Policies – Terrington St Clement (TSC)

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

TSC: <https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542882759485#section-s1542882759485>

Summary of Issues Raised: (Please see Appendix 1 for comments and responses)

- Support for allocation G93.3 from agent
- Support for proposed allocation TSC1 from agent
- NCC Transport confirm TSC1 acceptable. Please also see Appendix 1 for illustrative Masterplan, and Appendix 2 for NCC HA response to current planning application (18/00940/OM).
- Support for Site H360 (reasonable alternative) from agent
- Historic England made a number of helpful suggestions to policies within this chapter
- Environment Agency raised a number of points
- A further site has been proposed for consideration HELAA Ref. 2H062 (25-04-20191185). This has been appraised through the agreed HELAA methodology and progresses to the Sustainability Appraisal, see later in report for full details.

Conclusions & Recommendations:

- Amend SADMP allocation policies and supporting text in light of Historic England comments.
- Amend the supporting text in line with the progress of each site and the comments made by the Environment Agency.
- Continue to support the proposed allocation TSC1 from the draft stage through to the Pre-submission stage. Whilst there may not be an absolute need to allocate further residential sites, the numbers being provided are very close to the minimum required to meet the Local Housing Need (LHN). The site also offers a rather unique opportunity to improve the area and make use of a derelict brownfield site at the centre of the village, close to service and facilities including the primary and high schools (please see Sustainability Appraisal for further information). Allocation would aid Local Plan flexibility with regard to housing numbers, planning positively to ensure the Borough Council meets it's LHN. The site owners/agent have also brought forward a planning application for the site (18/00940/OM). The draft allocation and the planning application match, the application is currently pending a decision and is being held in abeyance to see if it is agreed the allocation should be carried forward.
- Remove the TSC buffer zone which is a part of G93.3. This no longer required as TSC1 is proposed to be taken forward
- Update the policy map accordingly

Policy Recommendation:

The supporting text will be updated also to account of the following changes to the policies.

G92.2 -Terrington St. Clement – Land Adjacent King William Close

1.Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the Conservation Area and the setting of the nearby Listed Building (Grade 2 Listed Post Office);

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G93.3 - Terrington St. Clement - Land West of Benn's Lane

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7. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and their settings.

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Policy TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane

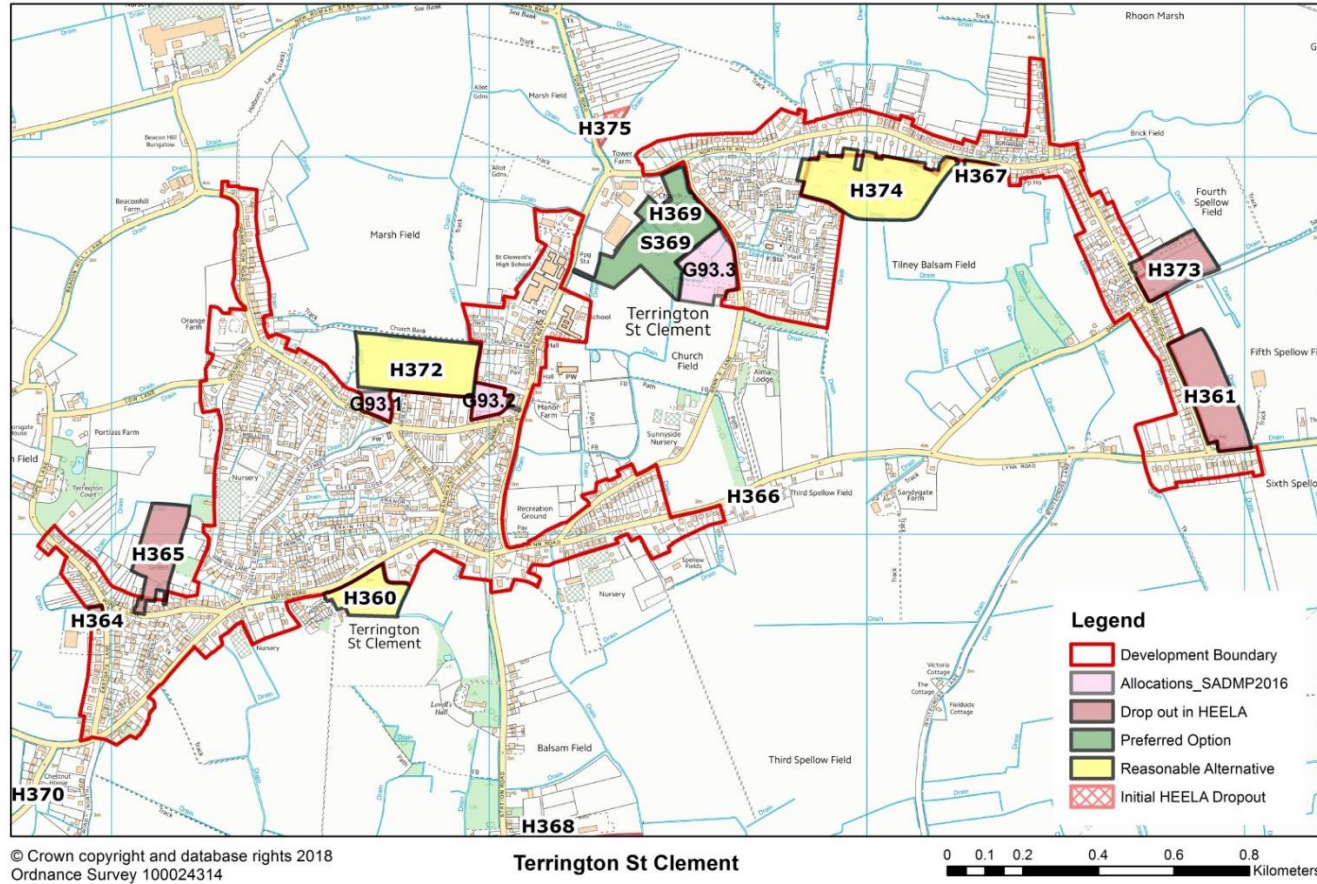
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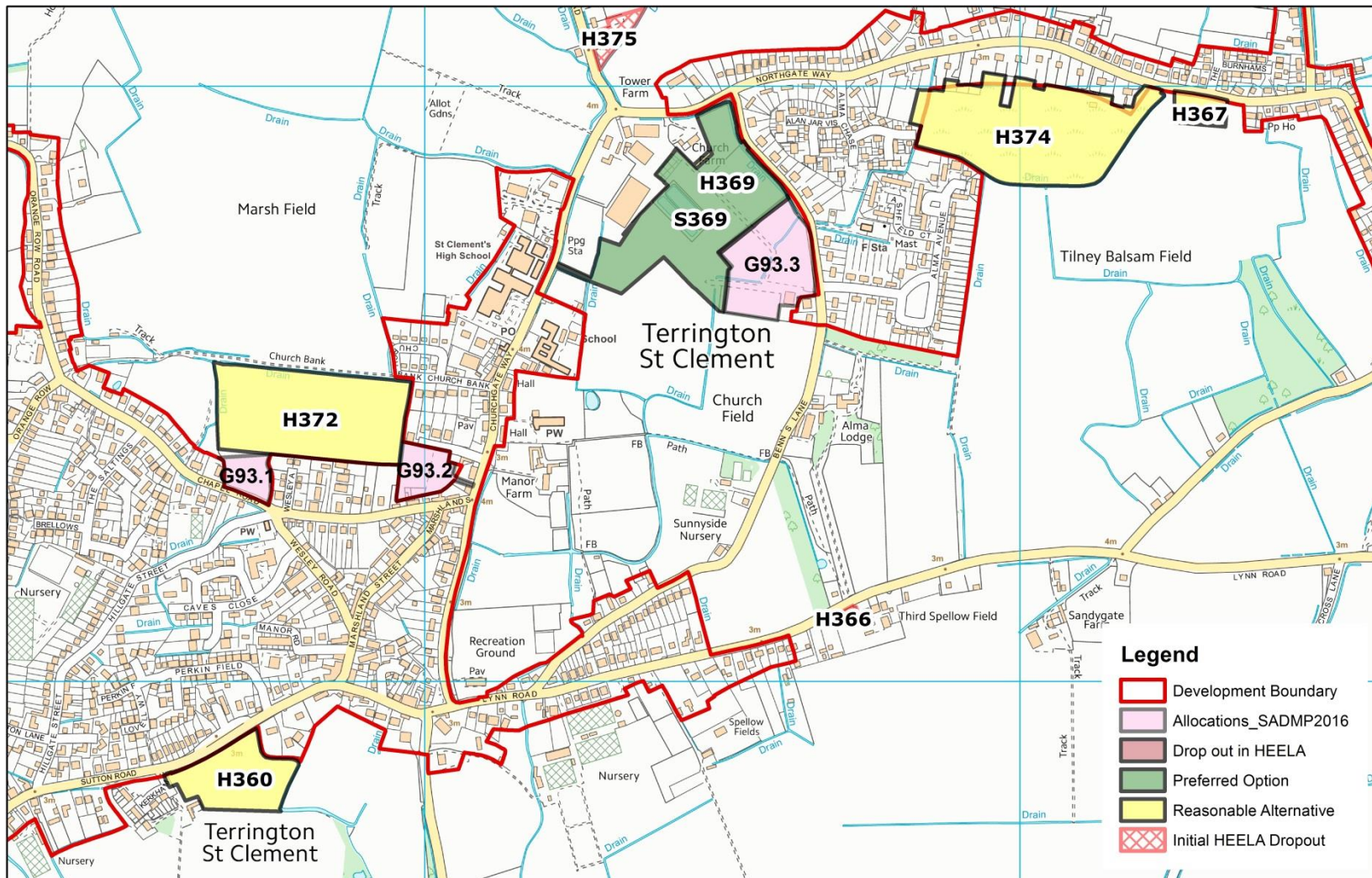
~~6. Submission of a Heritage Asset Statement that establishes that there will be no negative impact on Heritage Assets in the locality, accompanied by an Archaeological Field Evaluation of the site, if required~~

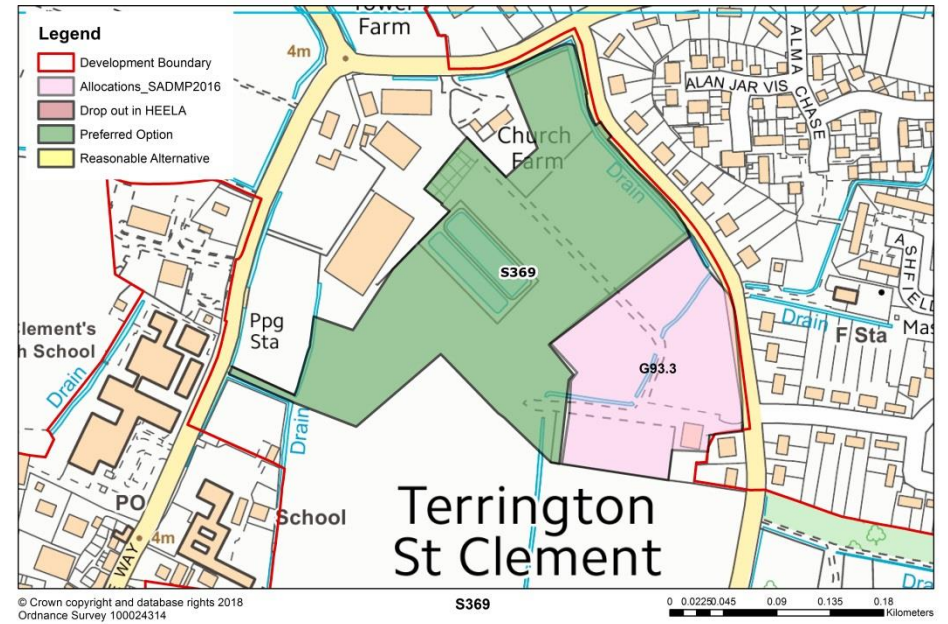
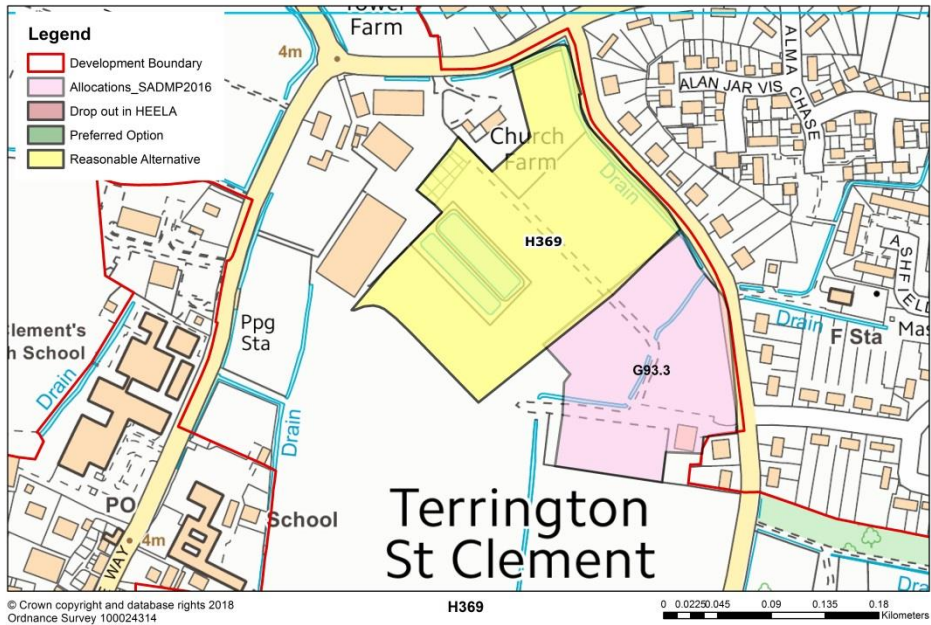
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and Grade 2 Listed Tower House and their settings. This should be accompanied by an Archaeological Field Evaluation of the site, if required.

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Terrington St Clement - Sustainability Appraisal – Site Map







Terrington St Clement – Sustainability Appraisal – Further Information

A number of sites were rejected in the HELAA due to the concerns regarding flood risk according to the best information available at that time. This was primarily Environment Agency mapping and the 2009 BCKLWN SFRA, which showed pockets of the settlement being within lower risk flood zone than others. Since the HELAA exercise was completed, the BCKLWN have updated their SFRA, this is based upon the latest available modelling and data. The latest SFRA, which looks at all sources of flooding, shows that the entire settlement of Terrington St Clement to be within Flood Zone 3a. There is considered to be no risk from fluvial flooding, the highest risk flooding mechanism is tidal / coastal (1-200 year breach) and the most likely source of flooding is surface water flooding (1 in 30 year event). Most of the settlement is within an area benefiting from flood defences.

With no sites being located within a lower Flood Risk Zone than Flood Zone 3a, those sites which were excluded by the HELAA for flood risk reasons alone have been brought back for further assessment in the sustainability appraisal.

Site H372 was rejected by the HELAA on access grounds, but brought back for further assessment. The final site brought back for further assessment is H369. This is because the site is classed as a Brownfield and there is a clear emphasis within planning and indeed the revised NPPF (2018/2019) upon the re-use of previously developed land.

Terrington St Clement – 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
LPr G93.1	++	+	O	xx	xx	O	#	O	O	#	#
LPr G93.2	++	+	O	+/x	xx	#	#	O	O	#	+/#
LPr G93.3	+	+	O	+	xx	#	#	#	#	#	+
SADMP G93.1	++	+	O	xx	+/x	O	#	O	O	#	n/a
SADMP G93.2	++	+	O	+/x	+/x	#	#	O	O	#	n/a
SADMP G93.3	+	+	O	+	xx	?	#	#	?	#	n/a
H360	++	+	O	xx	xx	#	#	#	O	O	#
H367	++	+	O	xx	xx	O	#	#	O	O	#
H369	++	+	O	+	xx	#	x	+	O	#	#
S369	++	+	O	+	xx	#	+/#	+	O	#	+
H372	++	+	O	xx	xx	#	x	#	O	#	#
H374	++	+	O	xx	xx	O	#	#	O	#	#

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

Terrington St Clement - Sustainability Appraisal – Site Commentary

G93.1 (Part of site 539) – The site is well integrated with the village and sits at a central position in close proximity to a range of local services and amenities. Site access is proposed from Chapel Street; the Highway Authority made no objections to small scale development on the site subject to local improvements to the road and pedestrian network. The site is situated in a built-up part of the village with existing housing to the east, west and south (opposite the road). Development would constitute infill and would relate adequately with the existing form of the area. It is considered that given its scale and the nature of the area, development is likely to have minimal impacts on the landscape character and amenity of the area. The LPr version of the site is the same as the SADMP one however the scores have been updated to reflect the current situation with regards to flood risk and the new factor ‘climate change’. Here a ‘#’ is awarded as whilst the settlement and site have been found to be sustainable and provide many services/facilities locally. Much will depend upon the design of the scheme, layout, and the details/specifications of the individual new homes.

G93.2 – The site is identified as one of the higher scoring sites in terms of access and proximity to services. It is centrally located and within walking distance to a number of local services including a pub, church, bus stops, shops, surgery, village hall and the school. Safe site access and pedestrian access is obtainable. The Highway Authority made no objections to the site subject to its design implementation. The site comprises of brownfield land (previous industrial use) and grade 1 (excellent quality) agricultural land. The eastern site boundary immediately borders the Conservation Area, the proposed access is within the Conservation Area and there is a Listed Building adjacent the site. Any impacts on this sensitive area can be mitigated by a high standard design scheme and layout that preserves or enhances the character of the Conservation Area and the settings of the Listed Building. The site is well integrated with existing development and is mostly screened on all sides by existing housing. As such development is likely to have minimal impact on the landscape and visual amenity of the area. The LPr version of the site is the same as the SADMP one however the scores have been updated to reflect the current situation with regards to flood risk and the new factor ‘climate change’. Here a ‘+/#’ is awarded as whilst the settlement and site have been found to be sustainable and provide many services/facilities locally and part of the site is brownfield. Much will depend upon the design of the scheme, layout, and the details/specifications of the individual new homes.

G93.3 – The site performs highly in the sustainability appraisal as the site comprises of only brownfield land meaning that development would not result in loss of productive agricultural land, also development of the site is likely to have no impact on the economy as it only comprises of derelict greenhouses and does not include employment area. The site scores positively in terms of proximity to services and is within reasonable walking distance to a good range of services including the school. Site access is proposed from Benn’s Lane and safe access and impact on the road network is dependent on the design of the scheme. The site is subject to high flood risk (FZ3). There are minimal views of the site available as it is mostly screened on all sides by mature planting and built development. Development on the site is likely to have minimal landscape and visual impact but provides an opportunity to visually improve the derelict nature of the site. The potential allocation of the land adjacent through the local plan review could allow access through onto Northgate Way as

opposed to Bennis Lane. The LPr version of the site is broadly the same as the SAMP version however the scoring has been updated for 'heritage' and landscape' to '#' as will be discussed later the site now benefits from planning permission. The score for 'climate change' is considered to be '+' as the location and settlement are considered sustainable and offer services/facilities for daily life locally, and the site is brownfield. Clearly there would be room for further improvement depending upon the final design of the development. A change to the site is proposed to occur in the event that the adjacent land is allocated as there will be need for the buffer zone that was previously part of the policy. This was to separate housing from potential employment uses on the adjacent, as a buffer zone would not be required if both elements were to be residential.

H360 (04-12-20161389) – This site, located to the south of the village, south of Sutton Road. The site is a short distance from what could be considered the centre of the village and the services currently on offer here. The site is classed as Grade 2 Agricultural Land and the promoter of sites states that it is in agricultural use. In terms of Flood Risk the site is located within Flood Zone 3a. Although the majority of site is masked existing development the Conservation Area and a number of listed buildings are only a short distance away and these heritage assets and their settings should be taken into consideration through the design of any scheme. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise they consider that any impact upon the functioning of the local road network could be reasonably mitigated. The site is predominantly surrounded by existing residential development of either a ribbon style or estate style (Perkin Field & Kerkham Close), so development of the site would be in keeping with the localised settlement pattern. It is considered that impact upon the natural environment would be neutral; no negatives have currently been identified with regard to 'Infrastructure, Waste & Pollution'. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H367 (28-11-20162336) – H367 is located to the east of the village on the southern side of Northgate Way. It is still within a reasonable distance to services and facilities but not as close as some of the other sites available. The site is classed as Grade 1 Agricultural Land and the promoter of sites states that it is in agricultural use. In terms of Flood Risk the site is located within Flood Zone 3a. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise they consider that any impact upon the functioning of the local road network could be reasonably mitigated. The site is predominantly surrounded by existing residential development of a ribbon style or estate/ cul-de-sac (The Burnhams) style. If developed the site would most likely be in a frontage ribbon style, the site would therefore be in keeping with the localised settlement pattern. No negatives have currently been identified with regard to 'Infrastructure, Waste & Pollution'. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H369 (28-11-20165391) – H369 is located in the eastern portion of the settlement and to the north west of SADMP allocation G93.3, which was found to be a sustainable location. The site has brownfield status as it was granted a certificate of lawful use for B2 General Industrial purposes in 2010. In the past the site hosted a horticultural business, it currently comprises a range of semi-derelict structures associated with this. The site has been vacant for some considerable time (almost 10 years), given this and potential for the site to meet the criteria set in Policy CS10 The Economy the impact upon ‘economy A business’ is judged to be neutral. The site isn’t currently and is unlikely to be agricultural land used for farming associated with cattle or crop production; therefore, the score for ‘economy B food production’ is a positive. As with all of the growth options for Terrington St. Clement this site is within Flood Zone 3a. The Conservation Area and a number of listed buildings are a short distance away from the site and therefore these and their setting will need to be taken into account should the site be developed and Norfolk Historic Environmental Services team have previously stated that there is the potential for archaeological remains to be present on the site. They state that further investigation would be required and that these can be conditions of planning permission (involving further site investigation). NCC HA consider that Benns Lane is substandard, including the junction with Lynn Road and Northgate Way and will remain substandard despite improvements associated with the development of SADMP allocation G93.1, hence the site receives a negative score for ‘highways & transport’. Given the previous use the BCKLWN Environmental Protection state there is the potential for contamination. Anglian Water state that off-site mains reinforcements may be required. The score for ‘landscape & amenity’ is judged to be a positive, as whilst the scheme will need to take into account existing housing in the local area, it will clearly replace a semi-derelict brownfield site which currently has no practical use and could continue to deteriorate to determinate of the area.

S369 (28-11-20165391) – This site is similar to Site H369. However, it is slightly larger and corresponds to the site proposed as a planning application, 18/00940/OM. Through the evolution of the determination process, an alternative access arrangement has been proposed. With access now proposed off Northgate Way. This is considered to be more favourable than having an access off Benn’s Lane, and Norfolk County Council as the Local Highway Authority would raise no objection. Consequently, the scores for the site in the majority of the site sustainability factors are similar, with exception of highways and transport which is now awarded a ‘+/#’ positive/dependent upon implementation. As The larger site could also cater for a pedestrian link onto Churchgate Way, close to the schools. As well as link road and path through to the existing allocation G93.1 enabling traffic generation from this development a route onto Northgate Way rather than using Benn’s Lane. With regard to ‘climate change’ site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, the site is also seeking to provide a footpath link to the schools and centre of the village. As discussed, all of Terrington St Clement is within Flood Zone 3a, and development of the site would take place on land classed as brownfield / previously developed. Through the planning application SuDs are proposed, the NCC as the LLFA welcome this and raise no objection, as do the Environment Agency. Therefore, the score for climate change on balance is a positive. It is recommended that the text above to Site H369 is consulted, rather than simply repeated in full here.

H372 (28-11-20169444) - This site was originally assessed in the HELAA and discounted as it was believed that there was no possibility of creating access to the site. However, the site promotor states that access can be gained through the existing SADMP allocation G93.1. Indeed a planning application for the site has been put forward and is currently being considered (17/01649/OM); the application is all matters reserved apart from access and the site plan shows the main access road traveling through the site to the land behind the application site, which is Site H372. A gap appears on the map between G93.1 and H372 but in reality, there isn't one as the outline application for site G39.1 covers this small gap. NCC HA considers that whilst access may be possible, the local road network is poor and there isn't the ability to achieve any significant improvements. They said yes to G93.1 on the basis that it was less than estate scale and they have stated previously they did not want to see any future development on land to the rear (which would include this site). The site is centrally located to the village with services close by. It is classed as Grade 1 Agricultural Land and appears to be in agricultural use. As with all of the growth options the site is within Flood Zone 3a. Although masked by existing development the Conservation Area is a short distance to east and south of the site. The site is boarded by development to the south and east, with some to the north east and some further to the west. Through the planning application previously mentioned it appears that there is a sewage pipe running across the north western portion of the H372 which would need further consideration. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

H374 (BCKLWN1) – Site H374 is located to the south of Northgate Way, in the eastern section of the village. The site is behind frontage development and would fill a gap between this and two housing estates (Alma Chase & Alma Avenue). This site is a reasonable distance from services and facilities, but not as close as other options. NCC HA considers that access can be achieved and any potential constraints can be overcome through development. Likewise, they consider that any impact upon the functioning of the local road network could be reasonably mitigated. It is considered that the impacts upon the natural and historic environment would be neutral. Anglian Water state that there is the potential for improvement to the utility capacity to facility development and that off-site mains reinforcement would therefore be required. The BCKLWN Environmental protection team state that there may be the potential for some contamination to be present on site. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

2H062 (25-04-20191185) – This site, located to the south east of the village, north of Lynn Road. The Scores positively for 'access to service' being a short distance from the village centre and services currently on offer. The site could provide housing and affordable housing which would be a benefit to 'community and social'. The site is currently classed as Grade 2 Agricultural Land and the promotor of site states it is agricultural use. The site like all

Terrington St Clement is within Flood Zone 3a. Most of the site is masked by existing development from the conservation area, however medium/short distance views to the Church and conservation area to the north west are available and heritage assets and their settings will need to be taken into consideration in the design of any scheme. NCC HA consider that access could be achieved from Lynn Road and that some footpath widening would be required. Within the site are a number of TPO's and a significant belt of woodland in the eastern portion, countryside and housing surround the site. The design of any scheme will be required to respond to this setting and the features located within the site. In terms of 'climate change' the site is located at a large Key Rural Service Centre which has the potential to limit the number of emitting trips to high order settlements, all of Terrington St Clement is within Flood Zone 3a. At this stage further details of the development in terms of layout and design of buildings are unknown.

Terrington St Clement - Sustainability Appraisal – Site Discussion

- **G93.1**– This site is allocated by the SADMP for a residential development of at least 10 dwellings. The site has come forward and benefits from full planning permission for 10 new homes (17/01649/O & 19/01589/RMM).
- **G93.2**– This site is allocated by the SADMP for a residential development of at least 17 dwellings. The site has come forward and benefits from full planning permission for 17 dwellings (19/00712/F). The majority of the site is complete. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O).
- **G93.3**– This site is allocated by the SADMP for a residential development of at least 35 dwellings. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O).
- All of the new sites considered through the Local Plan review score comparably similar through the sustainability appraisal. Whilst some sites score less well in certain factors other sites score better in other factors.
- Site H374 and H367 are greenfield site, they are slightly further away from what can be defined as the centre of the village, where the majority of service and facilities can be found.

- H372 is a greenfield site in close proximity to two SAMP allocations and the centre of the village, NCC HA would object to the development of the site based upon the nature of the local road network. H360 is a greenfield site and is located well in terms of services, as is potentially 2H062
- H369 merits further consideration as the site is Brownfield. The NPPF places a strong emphasis upon the re-use of previously developed land and states that housing need should be accommodated as much as possible on previously developed / brownfield land (para. 117). It also states that substantial weight should be given to the re-use of such land for homes, and appropriate opportunities should be supported to remediate despoiled, degraded, derelict, contaminated or unstable land (para. 118). S369 is a similar site to H369 albeit slightly larger, planning permission is being sought for the site and a part of this an alternative access arrangement utilising Northgate way has been proposed which is considered to be acceptable to NCC HA. The proposal also includes the provision of a link road with path to the adjacent site allocation (G93.3) which would also enable traffic generated from this site to utilise Northgate Way as opposed to Benn’s Lane. The site also scored the highest for ‘climate change’ in Terrington St Clement.
- It is the information provided in the above paragraph that results in the site being proposed for allocation in the Local Plan review, as whilst other sites score overall as well they do not offer the opportunity to develop a brownfield/ previously developed site. As development of the site represents an opportunity to re-develop a brownfield site and bring back in to active use by contributing towards meeting the housing needs of the area. The site is not currently in active economic use, it is difficult to suggest it will be and the future of the site if not used for housing is uncertain. S369 is capable of delivering a slightly higher number of dwellings (76) than sought for allocation and overall scores comparatively well. It should be noted this mirrors what is currently proposed by the planning application.
- Some of the remaining sites could be proposed for development in a future a Local Plan or Neighbourhood Plan, if considered appropriate at that time.

Terrington St Clement – Sustainability Appraisal – Site Conclusion

- Local Plan allocations G93.1, G93.2 & G93.3, for the reasons stated above, are proposed to carried forward as part of the Local Plan review.

- After very careful consideration and balancing all of the factors, including comments made by those consulted through the HELAA, the draft Local Plan review, and current planning application, Site S369 is proposed for the residential development of at least 76 dwellings, which is in-line with the current planning application, 18/00940/OM.

Terrington St Clement

Key Rural Service Centre

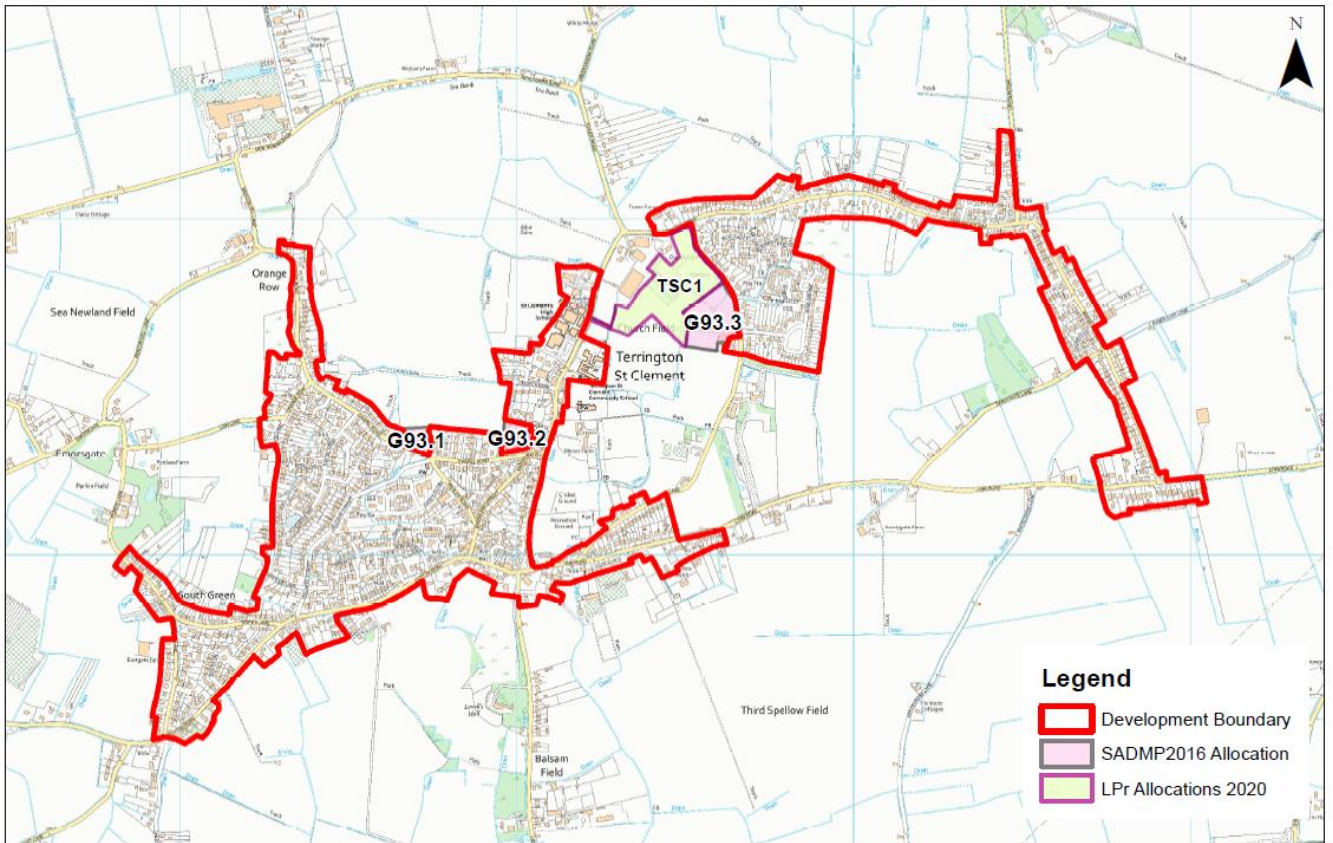
Description

Terrington St Clement is a relatively large marshland village situated to the north of the A17 road, 7 miles west of King's Lynn. The village church known as the 'Cathedral of the Marshland' dominates the surrounding fenland and forms the core of the village. The pattern of the village often follows the lines of sea defence banks and parts of the intervening spaces have been in-filled with development. The often-mature landscape gives the village a rural feel which is enhanced by frequent glimpses of open countryside.

A part of the settlement (north-east) is designated a Conservation Area to preserve and enhance its special architectural and historic quality.

The settlement benefits from a range of services including schools, surgery, bus route, post office, shops, pubs, filling station and other employment and retail uses. The village and its importance as a centre for services and employment create a lively and active place. The population of the parish is 4,125 (Census Data 2011).

Terrington St Clement is designated a Key Rural Service Centre because of the range of facilities available and its potential to accommodate growth to sustain the wider rural community. The SADMP (2016) made three residential housing allocations for at least 55 new dwellings. The Local Plan review seeks to carry these forward and also seeks to make a further allocation for at least 76 new dwellings. The site represents a rather unique opportunity to bring an un-used brownfield (previously-developed) parcel of land in a relatively central position back into active use.



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Terrington St. Clement

0 0.075 0.15 0.3 0.45 0.6
 Kilometers

G93.1 - Terrington St. Clement - Land at Church Bank, Chapel Road Policy

Site Allocation

Policy G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road

Land amounting to 0.5 hectare at Church Bank, Chapel Road, as shown on the Policies Map is allocated for residential development of at least 10 dwellings.

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

1. Prior submission of a desk-based Archaeological Assessment of the site and proposed development;
2. A Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
3. Submission of details showing how the sewer crossing the site can be accommodated within the development (including any easements/diversions) to the satisfaction of Anglian Water;
4. Demonstration of safe access and provision of adequate improvements to local road network;
5. Provision of affordable housing in line with the current standards.

Site Description and Justification

The allocated site is situated in a central part of the settlement immediately adjacent the development boundary. The site comprises Grade 1 (excellent quality) agricultural land. Whilst development would result in the loss of productive agricultural land, this also applies to other developable site options in the village and there is an identified need for additional housing in the settlement. The land is flat grassland and other than boundary hedgerows there are no landscape features of importance on the site.

The site is situated in a built-up part of the village. The surrounding area comprises of existing housing development to the south, east and west with open fields to the north. It is considered that development on the site will not be visually intrusive in the landscape. Views are limited to near distance from adjacent roads and properties. Wider views are available from the north but in this view, development would be seen in the context of the existing settlement.

It is considered that development of at least 10 residential dwellings in this location will not be detrimental to the form and character of the area but would rather form a continuation of existing housing on Chapel Street, infilling the gap between existing housing to its east and west. The site is well integrated with the central part of the village and in close proximity to a number of services the village has to offer. This potentially provides opportunity for residents to walk or cycle to these amenities. Norfolk County Council as the local highway authority identifies the site to be well located

and made no objections to the allocation of this the site subject to localised improvements to the road network.

All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA (2019), therefore there are no sites located within a lower risk flood zone. The appropriate flood mitigation measures are required by the allocation policy above.

The site has come forward and benefits from full planning permission for 10 dwellings (17/01649/O & 19/01589/RMM).

G93.2 - Terrington St. Clement - Land Adjacent King William Close Policy

Site Allocation

Policy G93.2 - Terrington St. Clement - Land Adjacent King William Close

Land amounting to 0.7 hectare north of Chapel Road, as shown on the Policies Map is allocated for residential development of at least 17 dwellings.

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

1. Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the Conservation Area and the setting of the nearby Listed Building (Grade 2 Listed Post Office);
2. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
3. Demonstration of safe access and adequate visibility being achieved, the details of which are to be agreed by Norfolk County Council as local highway;
4. Provision of affordable housing in line with the current standards.
5. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation.

Site Description and Justification

The site previously contained industrial buildings but these have since been demolished. Development of the site would allow the reuse of this previously developed land thus reducing the pressure to build on productive agricultural land. Landscape features within the site include boundary hedgerows but no other landscape features of note.

The site is located in a built-up part of the village. It is largely surrounded on all sides by existing housing. As such, the proposed development would relate satisfactorily with the existing character of the area. Views are limited to glimpses from adjacent roads and properties. There are few opportunities for long and medium distance views from the west, but in these views, development would largely be seen in the backdrop of the existing settlement.

The site's eastern boundary immediately abuts Terrington St Clement Conservation Area, there is a Listed Building adjacent the site (Grade 2 Listed Post Office) and access is proposed through the Conservation Area. Therefore, given its sensitive location, the design and layout of the development must be of a high standard that would conserve and enhance the setting of the Conservation Area and respect the settings of the Listed Building.

This site is identified as the highest scoring site, of those available in the village, in terms of proximity to services; it is well located with good links and provides an opportunity for residents to walk or cycle to key village services. Safe access into the site can be achieved from either King William Close or the junction off Churchgate Way adjacent the public house. King William Close is a private road, as such the developer would be required to bring it up to adoptable standards in order for access to be gained. Access could alternatively be obtained off Churchgate Way, at the junction next to the public house subject to adequate visibility being achieved. The policy ensures that the specific details regarding access be agreed by the local Highway Authority prior to the development taking place.

All of Terrington St. Clement is located within Flood Zone 3 according to the BCKLWN SFRA (2019), therefore there are no sites located within a lower risk flood zone. The appropriate flood mitigation measures are required by the allocation policy above.

The site has come forward and benefits from full planning permission for 17 dwellings (19/00712/F). The majority of the site is complete.

G93.3 - Terrington St. Clement - Land West of Benn's Lane Policy

Site Allocation

Policy G93.3 Terrington St. Clement - Land West of Benn's Lane

Land amounting to 2.2 hectares west of Benn's Lane, as shown on the Policies Map is allocated for residential development of at least 35 dwellings.

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

1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
2. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's 'Guiding Principles for Land Contamination';
3. Demonstration of safe access from Benn's Lane and the provision of adequate pedestrian/cyclist links;
4. Provision of affordable housing in line with the current standards.
5. Satisfactory accommodation of the Internal Drainage Board maintained drain crossing the site.
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and their settings

Site Description and Justification

The allocated site is situated north-east of the village of Terrington St Clement, with its eastern boundary abutting the development boundary. The site comprises brownfield land. The land currently accommodates derelict greenhouses which were previously used for horticultural purposes. Development of the site, reduces the pressure to build on greenfield productive land and also provides an opportunity to improve the existing derelict appearance of the site. Landscape features on the site include mature hedges along the site boundaries.

The surrounding area consists of residential road frontage development to the east, open fields to the south and west, and industrial land to the north. The site is well screened by mature hedges along the eastern site boundary. Near distance views are limited to glimpses from adjacent road and nearby properties. There is some opportunity for medium and long-distance views particularly when viewed south of Benn's Lane, but in these views, development would be seen in the context of the existing built environment. Therefore, it is considered that development would not be harmful to

the visual and landscape amenity of the area but would rather be an improvement on the derelict structures presently on the site.

The site and the area north of the site is subject to a certificate of lawful use for B2 (general industrial) which was granted in 2010. There is currently no industrial development in the area but in order to avoid any conflicts between the proposed residential development and any future potential industrial uses north of the site, a policy is included as part of the allocation to ensure an explicit buffer area (minimum width of 30m) is provided along the northern site boundary as part of the residential development.

There is an open drain within the site which is maintained by King's Lynn Internal Drainage Board (IDB). It is recommended that discussions are held with the IDB prior to the planning application stage.

In terms of access and proximity to services, the site is within reasonable walking distance to Churchgate Way where the majority of local services are situated including the primary and high schools, shops, public house, village hall, post office and bus stops. Site access is proposed from the existing access on Benn's Lane. Due to the nature of the southern part of Benn's Lane and the junction onto Lynn Road, it is recommended that appropriate works are undertaken, and the design and layout of the scheme should aim to encourage use of the Northgate Way junction and the northern part of Benn's Lane.

The size of the site is sufficiently large to accommodate at least 35 dwellings at a density consistent with the locality and also accommodate the aforementioned buffer area north of the site and address any other possible issues surrounding the drain within the site, site access and loss of hedgerows.

Whilst the site is within a high flood risk area (flood zone 3). All of Terrington St Clement is within the same flood zone. The site is suitable in terms of distance to services and proximity to the village. Development on the site is subject to the appropriate flood mitigation measures outlined in the policy above.

In summary, the Borough Council considers that this site provides an ideal opportunity for a well-located residential development on a derelict, brownfield site whilst also visually improving the area. The site has come forward and benefits from outline planning permission for 44 dwellings (16/02230/O). Should the wider area be allocated for development as proposed by this Plan, as TSC1, the buffer zone originally required by the SADMP policy is no longer required. This is because the two areas will be residential. Whereas the policy originally envisaged the buffer zone being required between a residential area and an employment area.

TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane Policy

Site Allocation

Policy TSC1 – Terrington St Clement Land south of Northgate Way and west of Benn’s Lane

Land amounting to 4.9 hectares, as shown on the Policies Map, is allocated for residential development of at least 76 dwellings.

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

1. Demonstration of safe access from Northgate Way to the satisfaction of Norfolk County Council as the Local Highway Authority, the provision of adequate pedestrian/cyclist links, including a link through to Churchgate Way, and a pedestrian, cycle and road link to the adjacent land allocated as G93.1;
2. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);
3. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
4. Satisfactory accommodation of the Internal Drainage Board maintained drain crossing the site;
5. Submission of a detailed Contamination Assessment in accordance with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency’s ‘Guiding Principles for Land Contamination’;
6. Submission of a Heritage Asset Statement that establishes that development would conserve and where appropriate enhance the Conservation Area, Grade 1 Listed Church and Tower, and Grade 2 Listed Tower House and their settings. This should be accompanied by an Archaeological Field Evaluation of the site, if required;
7. Provision of affordable housing in line with the current standards.

Site Description and Justification

The site proposed for allocation (Site Ref. S369) is a slightly larger site than was originally submitted (Site Ref. H369). The larger site provides additional benefits and some of the constraints associated with the smaller site have been overcome through the evolution of a planning application for the larger site (18/00940/OM).

The site has brownfield status as it was granted a certificate of lawful use for B2 General Industrial purposes in 2010. In the past the site hosted a horticultural business, it currently comprises a range of semi-derelict / derelict structures associated with this. The site has been vacant for some considerable time (approximately 10 years). Given the rural nature of the Borough the vast majority of sites which come forward are Greenfield, the site therefore represents an opportunity to develop a brownfield site that has a very limited current use and ensure it makes a positive contribution the local area and housing supply. This is very much in line with current Government thoughts as set out within the National Planning Policy Framework (NPPF 2019).

Location wise, the site is situated just to the east of the central portion of the village, the majority of service and facilities on offer within the village are a relatively short distance away including the schools. The surrounding area consists of a mixture of road frontage residential development and estate style developments to north/east. To the south and west is the primary and high school. Near distance views are limited to glimpses from adjacent road and nearby properties. There is some opportunity for medium and long-distance views particularly when viewed south of Benn's Lane, but in these views, development would be seen in the context of the existing built environment. Therefore, it is considered that development would not be harmful to the visual and landscape amenity of the area but would rather be an improvement on the derelict structures presently on the site.

Access to the site is proposed to be taken from Northgate Way, to the north, Norfolk County Council as the Local Highway Authority would object if access was taken from Benn's Lane, to the east, however they do not object to this access arrangement. The site also offers the opportunity to provide a link through to the allocated site G93.3 which could assist in alleviating traffic from Benn's Lane. A pedestrian link from the site to Churchgate Way is proposed and this would enable future residents to walk to services and facilities, including the schools which are located upon Churchgate Way, close by.

Terrington St Clement is wholly located within Flood Zone 3, therefore there are no sites available within a lower flood risk zone. The site is located within a sustainable settlement which is identified as a Key Rural Service Centre, it is centrally located and is classed as previously developed land. The site is within Flood Zone 3 (high risk) of the latest Borough Council's Strategic Flood Risk Assessment (SFRA) 2019. The Environment Agency raised no objection to the planning application (18/00940/OM). Site allocation has been carried out in accordance with the BCKLWN's SFRA 2019 & The EA / BCKLWN Protocol for sites at risk to flooding.

There is an open drain within the site which is maintained by King's Lynn Internal Drainage Board (IDB). It is recommended that discussions are held with the IDB prior to the planning application stage.

The Terrington St. Clement Conservation Area, and the Grade 1 Listed Church and Tower, contained within this are a short distance away from the site, to the south west. There is also a Grade II Listed Building (Tower House) to the north of the site, on the north side of Northgate Way. Therefore, these heritage assets and their setting will need to be taken into consideration. Norfolk Historic Environmental Services (HES) have previously stated that there is the potential for archaeological remains to be present on the site. Hence the above policy contains an appropriate item.

In summary, the Borough Council considers that this site provides an ideal opportunity for a well located sustainable residential development on a derelict, brownfield site whilst also visually improving the area.

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Kate Green (Avison Young / Hayford)	Support	<p>Key Rural Service Centres – 12.19 Terrington St Clement</p> <p>The SADMP (2016) allocated three development sites adjacent to Terrington St Clement with a combined capacity of at least 55 dwellings. These comprise:</p> <ul style="list-style-type: none"> • G93.1 – Land at Church Bank, Chapel Road; • G93.2 – Land adjacent King William Close; and • G93.3 – Land west of Benn’s Lane. <p>The land west of Benn’s Lane now has planning permission for 44 dwellings (Application Reference: 16/02230/OM).</p> <p>The Local Plan Review proposes that at least an additional 26 dwellings be delivered within or adjacent to the settlement and proposes an additional allocation south of Northgate Way.</p> <p>Heyford is supportive of the Council’s approach to Plan making, which echoes the presumption in favour of sustainable development set out at Paragraph 11 of the NPPF. Point B states that “strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.” This is reinforced at Paragraph 35, Point ‘A’, which defines the concept of ‘positively prepared’.</p> <p>Furthermore, the settlement has a good range of services and facilities and is well served by public transport. It is a sustainable location for growth and can accommodate development without giving rise to adverse effects or placing a strain on the settlement’s infrastructure.</p>	N/A	The support is very much noted
Peter Humphrey		My Client is in agreement with the identification of Terrington St	Add the Kerkham Close	Please see the Local Plan

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Clement, within the Key Rural Settlement category within the settlement hierarchy in the emerging local plan. This reflects the range of local services and facilities that the village supports and provides to lower order settlements surrounding.</p> <p>It is considered that in order to support and maintain the local services an increased allocation of housing to the village is necessary. The promoted site (Kerkham Close) was offered in the SHLAA and has been subject to a previous application which just missed the 5 year land supply window. Within the consideration of the planning application 16/00309/OM the submission addressed all significant matters, however ultimately it was refused on development outside the development boundary and lack of overriding need for the housing. As a result of this refusal the council also determined that the site failed the exception test; however as set out below it did pass the sequential test.</p> <p>The planning application and concluded that there were no overriding constraints to development with no objections from consultees in respect to the application; in addition it was concluded that the flood risk was equivalent to that elsewhere in the village and that this could be mitigated through detail design in accordance with the site specific FRA which was submitted with the application. In relation to ecology- the site is part of a single flat field which has been intensively farmed for arable crops. Other than the ditches on the road frontage and the eastern and western boundaries to the site there is no potential for ecological interest. It is noted that the Government Magic website indicates that the site is not significant for protected habitat or protected species in other than the widespread designation for farmland birds. Should the LPA be minded to incorporate the site as an allocation we can provide a phase 1 ecological report as necessary.</p>	<p>site as a new allocation Terrington St Clement, it is sustainable and deliverable and could come forward immediately or at another point within the development plan timeframe</p>	<p>review Sustainability Appraisal</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>It is noted that the sites allocated in the SADMP have all come forward and have permission.</p> <p>It is however questioned as to whether the new allocation is the best solution having regard to wider sustainability matters.</p> <p>It is contended that the promoted site at Kerkham Close (H360) is better related to many of the core services and facilities in the village and is easier to access them along Lynn Road and if this cannot be considered as an alternative to the new allocation then it could come forward as an addition to it to provide up to 33 new dwellings including affordable homes. It is noted that the new allocation is currently subject to an outline planning application and is due for determination in May. It is acknowledged in the ctte report pursuant to the Kerkham Close site that it is a sustainable and suitable site for development and the only reason for refusal was the development boundary</p>		
Mrs Elizabeth Mugova (Environment Agency)	Suggestion	<p>G93.1 Terrington St. Clement - Land at Church Bank, Chapel Road:</p> <p>12.19.1.5 – ‘In line with the sequential test, the site is located in a lower flood risk area compared to other higher flood risk sites in the settlement. The appropriate flood mitigation measures are required by the allocation policy above.’</p> <p>Clarify how this conclusion has been reached. The site is entirely within Flood Zone 3 and in an area shown to flood on EA THM.</p>	Clarification	<p>The site has already been through the Local Plan process, it is allocated having been found ‘sound’. It now benefits from outline planning permission (17/01649/OM) and a reserved matters (19/01589/RMM) has also been approved (27/01/2020). It is proposed to updated this text: All of Terrington St. Clement is located within</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				Flood Zone 3 according to the BCKLWN SFRA2019, therefore there are no sites located within a lower risk flood zone. and update the position with regards to site progress as above.
Ms Debbie Mack (Historic England)	Object	G93.2 - Terrington St. Clement - Land Adjacent King William Close: Object - Given this site's location, we welcome the recognition given to the conservation area and listed buildings in the draft policy and supporting text. It is not clear which listed building is being referred to in the policy; this would benefit from clarification. We note that the site was allocated in the previous plan and now benefits from full planning permission.	Identify which listed building in the policy and supporting text	Amend policy and text to reference the Grade 2 Listed The Old Post Office. It should be noted that the site is already allocated and benefits from full planning permission
Mrs Elizabeth Mugova (Environment Agency)	Suggestion	G93.2 - Terrington St. Clement - Land Adjacent King William Close: Site Description and Justification There is no detail in this section to demonstrate how flood risk has been considered.	The site is within Flood Zone 3 and therefore justification for allocating the site should be provided. Demonstrate how the sequential test has been carried out.	Update text : All of Terrington St Clement is located within Flood Zone 3, therefore there are no available sites located within a lower risk flood zone. The site has already been through the Local Plan process, it is allocated having been found 'sound'. It now benefits from full planning permission (17/01450/FM). Indeed the site is currently under construction with 12 of 17

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
				dwelling permitted complete (28/08/2019)
Ms Debbie Mack (Historic England)	Object	G93.3 - Terrington St. Clement - Land West of Benn's Lane: Object - Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south west of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.	Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.	Amend policy and text to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower and their settings.
Kate Green (Avison Young / Hayford)	Suggestion	G93.3 - Terrington St. Clement - Land West of Benn's Lane: The land west of Benn's Lane is proposed to be allocated for the development of at least 35 dwellings within the Plan. The policy wording specifically sets out a list of criteria which future development will be required to meet in order to be supported and found acceptable. Notwithstanding this, the Plan (Paragraph 12.19.3.9) recognises that the site has come forward inasmuch that it benefits from an outline planning permission (dated 04th April 2018) for the demolition of existing structures currently located within the site boundary and the erection of up to 44 dwellings with means of site access from Benn's Lane. The Council notes that the proposed allocation of the site affords an opportunity to develop a redundant brownfield site in a sustainable location adjacent to the settlement boundary of Terrington St Clement, thereby reducing the pressure to build on Greenfield land and thus supporting the overarching principles of the National Planning Policy Framework (2019). Heyford is supportive of the Council's proposed allocation,	Notwithstanding the above, the premise of development for up to 44 dwellings on the land west of Benn's Lane is therefore supported by the Council through the granting of permission. Consequently, the wording of the Policy G93.3 should be revised and updated to reflect this	The site has planning permission for 44 dwellings which is consistent with the allocation policy for at least 35 dwellings. No amendment suggested

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>however, would recommend that the policy wording is reviewed to reflect the outline permission granted for up to 44 dwellings (Application Reference: 16/02230/OM).</p> <p>The planning application package and submission of technical evidence demonstrates that the site's constraints have been thoroughly assessed to determine the suitability of the site for this quantum of development (44 dwellings). As such, the technical assessments conclude that a sustainable development supporting the following benefits can be realised:</p> <ul style="list-style-type: none"> • Provision of a buffer to mitigate the impacts of the adjacent employment uses on future residents; • An appropriate flood mitigation strategy for flooding and surface water drainage. This includes the implementation of a Sustainable Urban Drainage pond and discharge into the New Cut Drain, as approved by the Internal Drainage Board (IDB). The proposals further confirm that access to the New Cut Drain will be maintained for the IDB. • Safe access and egress to the site, including the provision of highway and pedestrian improvements along Benn's Lane to Northgate Way; and • The provision of 20% affordable housing. <p>It should be noted that a detailed Contamination Assessment, in line with the criteria set out in the draft policy wording, will be submitted and agreed through an application to Discharge Conditions.</p>		
Kate Green (Avison Young / Hayford)	Support	Avison Young have submitted a planning application (ref: 18/00940/OM), on behalf of Heyford Developments Ltd, in relation to the land south of Northgate Way and west of Benn's lane, Terrington St Clement, which forms a draft allocation (TSC1) in the		Support appreciated and noted

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>Local Plan Review 2019. In terms of the aforementioned planning application, this was submitted last year and was validated on 06th June 2018. As a result of the submission, the application has been subject to an extensive period of consultation, including with the Environment Agency. The Environment Agency first commented by letter dated 26th June and confirmed that they had no objections to the proposed development subject to a condition to ensure the subsequent proposals implemented the mitigation measures as detailed in the supporting Floor Risk and Drainage Strategy. The Agency also commented on a Flood Plan, the Internal Drainage Board, Flood Resilient Measures and Flood Warning. In relation to those comments, I can confirm that the IDB have been consulted with regard to flood risk associated with their watercourses and the surface water drainage proposals and permission has been granted to discharge surface water into the New Cut Drain. A secondary consultation exercise was undertaken to consider amendments to the proposed masterplan and, again, the EA confirmed their support for the application stating they had no further comment to add to their letter dated 26th June 2018 (email dated 10th October 2018). The application is now being held in abeyance and a call is scheduled for the 26th June with the case officer and principle planner to discuss the progression of the application. Regarding the recent consultation undertaken in respect of the Local Plan Review, representations were made by myself, on behalf of Heyford, and others on Policy TSC1 (the proposed development site) including from the Environment Agency, who made the following comments: "Can residual risk (EA THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?" We consider their above comments to conflict with those made in relation to the</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>aforementioned planning application, which as I mentioned, raise no objections to the proposed development. I have since made contact with the officer who made the above comments to the Local Plan and she has confirmed that the LPA should satisfy themselves that the location of development, where possible, should avoid flood risk to people and property. We feel that this has been suitably demonstrated through the Flood Risk Assessment and Drainage Strategy submitted within the application and supported by both the LLFA and EA. I therefore wanted to write to you and, in the first instance, make you aware of the difference between the two sets of comments provided by the Environment Agency and, secondly, offer mine and the applicant's support during the Council's preparation of the Local Plan Review. Should you require any further information or evidence to support the draft allocation of the land south of Northgate Way and west of Benn's Lane, and therefore satisfy the Inspector at Examination that the site is suitable for allocation within the Local Plan, then please do not hesitate to contact myself on the below details</p>		
Ms Debbie Mack (Historic England)	Object	<p>G93.3 - Terrington St. Clement - Land West of Benn's Lane: Object - Whilst there are no designated heritage assets within the site, the Terrington St Clement Conservation Area including grade I listed Church and Tower are located to the south of the site and the grade II listed Tower House to the north of the site. Any development has the potential to affect the setting of the Conservation area and listed buildings. Reference should be made to the need to conserve and where appropriate enhance heritage assets and their settings in both the policy and the supporting text.</p>	<p>Amend policy to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.</p>	<p>Amend policy and text to state that Development should conserve and where appropriate enhance the Conservation Area and grade I listed Church and Tower, grade II listed Tower House and their settings.</p>

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
Norfolk County Council Transport	Comment	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: Subject to vehicle and pedestrian access onto Churchgate Way and providing a through road. Vehicular access onto Churchgate Way is considered essential if possible to avoid impact on the sub-standard Benn's Lane		The allocation policy is in line with the planning application which NCC HA have said is acceptable/ no objection. No action proposed
Mrs Elizabeth Mugova (Environment Agency)	Comment	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: Can residual risk (EA THM) be considered in the application of the ST so that a site that floods to shallower depths is allocated?		EA raise no objection to the planning application (18/00940/OM). Site allocation will be carried out in accordance with the BCKLWN SFRA 2019 & The EA / BCKLWN Protocol for Sites at risk to flooding. Policy and text contain relevant flooding clauses/information. Update supporting text accordingly. As above plus: Terrington St Clement is wholly located within Flood Zone 3, therefore there are no sites available within a lower flood risk zone. The site is located within a sustainable settlement which is a KRSC, it is centrally located and is classed as previously developed land.
Kate Green (Avison Young / Hayford)	Support	TSC1 - Terrington St Clement - Land South of Northgate Way and West of Benn's Lane: The land south of Northgate Way is proposed to be allocated for a development of at least 76 dwellings. The Council notes that such a scale of development would exceed the 'at least 26 dwellings' proposed for the		Support appreciated and noted

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>settlement but, quite rightly concludes that the allocation represents an opportunity to develop a brownfield site that has a very limited current use, ensuring that it makes a positive contribution to the local area and housing supply. This, it goes on to say, is very much in line with current Government thoughts as set out within the NPPF. It also notes that developing here may compensate for the fact that suitable sites for development may not be found in all KRSCs. Heyford agrees with the Council's assessment and is supportive of the proposed allocation. Moreover, Heyford can confirm that the site is suitable, available and deliverable. This can be demonstrated through the submitted planning application and the technical assessments prepared in support of the proposed uses. In this context, the benefits of developing the proposed site have been assessed against the criteria set out in the proposed policy wording and can therefore be surmised as follows:</p> <ul style="list-style-type: none"> • The delivery of up to 76 dwellings on a redundant brownfield site adjacent to the settlement boundary of a Key Rural Service Centre, in line with the Plan's housing needs targets and the objectives set out in the NPPF (2019). • Ability to provide safe access and egress to the site from Northgate Way, as demonstrated in the supporting Illustrative Masterplan. Heyford have received confirmation from Norfolk County Council as the Highways Authority in support of the revised access proposals. • Provision of pedestrian and cycle routes to Churchgate Way and the potential opportunity to extend this to the adjacent draft allocation located to the east of the development proposal (G93.3) as demonstrated in the Illustrative Masterplan. • The provision of an appropriate mitigation strategy for flooding 		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>and surface water drainage. In this context surface water will be drained into the watercourse network via a proposed connection into the existing drain to the west of the site boundary. To facilitate the proposed development and to ensure the required easements are provided, a diversion of the New Cut Drain will be required along the south-eastern edge of the site. The Internal Drainage Board confirmed their support for this method of discharge through a notice of intention to grant consent dated 21st September 2018.</p> <ul style="list-style-type: none"> • The protection and enhancement of nearby heritage assets, notably the Grade I Listed Church of St Clement and its associated Grade I Listed Tower. The submitted Heritage Assessment confirms that the proposed development would not impact or harm the archaeological, architectural or common values of the adjacent heritage assets due to the existing vegetation located in the churchyard which impede any view from the proposed development site. • The delivery of up to 20% affordable homes, in line with the proposed policy (LP25) which sets out the requirements for development sites outside of King's Lynn. Notwithstanding this and as set out in our comments responding to Policy LP25, clarification is required regarding the total proportion of affordable housing attributed to sites located outside of King's Lynn. <p>Furthermore, it should be noted that Heyford are commissioning additional technical surveys to be undertaken to address outstanding issues, including a detailed Contamination Assessment and remediation strategy.</p> <p>It should further be noted that details of the management and maintenance of the proposed SuDs will be the subject of on-going discussions with the Local Planning Authority. In the event that</p>		

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		<p>these are not adopted, a plan will be prepared and agreed with the Authority in line with an appropriately worded planning condition. As demonstrated above, the planning merits and benefits associated with the development of the proposed site can be realised and have been appropriately assessed by Heyford. Therefore, the site's allocation for 76 dwellings is supported in line with the objectives of the draft Local Plan and national planning policy guidance.</p>		

Appendix 2: TSC1 Site Illustrative Masterplan



PROJECT	CLIENT	ILLUSTRATIVE MASTERPLAN	Drawing Number	Rev.	Date	townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH E.kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789
Land at Northgate Way, Terrington St Clement	Heyford Developments		IMW-01	J	28-09-18	

Appendix 3: NCC HA response to TSC1 Planning Application 18/00940/OM



Community and Environmental
Services
County Hall
Martineau Lane
Norwich
NR1 2SG

Natacha Osler
Borough Council of King's Lynn & West Norfolk
Kings Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX

NCC contact number: 0344 800 8020
Text Relay - 18001 0344 800 8020

Your Ref: 18/00940/OM
Date: 29 October 2018

My Ref: 9/2/18/0940
Tel No.: 01603 228948
Email: andrew.willeard@norfolk.gov.uk

Dear Natacha Osler

**Outline Application: Erection of 76 dwellings with means of site access following demolition of existing structures
TERRINGTON ST CLEMENT - Church Farm Distribution Depot Northgate Way / Bennis Lane**

As you will be aware the County Council have consistently stated that we do not support further development at this location, largely due to the sub-standard nature of the southern end of Benn's Lane.

However, the amended proposal shown on drawing 3418-01 rev B provides an acceptable access direct to Northgate Way, not Bennis Lane. Whilst, this would not prevent vehicular traffic from using Bennis Lane, Northgate Way is constructed to an acceptable width for this scale of development. Therefore, access to the wider highway network is clearly possible without the need to use Bennis Lane and any impact on it is likely to be minimal.

As a consequence, despite our longstanding view of development in this location. The County Council no longer considers we could substantiate a recommendation of refusal. Therefore, should the Borough Council deem this application to be acceptable, in relation to highway matters, the County Council would not wish to raise an objection to the granting of planning permission subject to imposing appropriate conditions

Yours sincerely

Andrew Willeard

Engineer (Major and Estate Development)
for Executive Director for Community and Environmental Services

www.norfolk.gov.uk