

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



**Borough Council of King's Lynn and West Norfolk's  
Response to  
the Issues and Questions raised by Inspector David  
Hogger  
in relation to the  
King's Lynn and West Norfolk Local Plan:  
Site Allocations and Development Management  
Policies**

**Issue 11: Wisbech Fringe (F3.1)**

**Examination  
June 2015**

## Table of abbreviations used with the Council's Statements

Abbreviation	Full Wording
AONB	Area of Outstanding Natural Beauty
BCKLWN	Borough Council of King's Lynn and West Norfolk
BDC	Breckland District Council
CLG	Communities and Local Government
CITB	Construction Industry Training Board
CS	Core Strategy
DM	Development Management
DPD	Development Plan Document
EA	Environment Agency
FDC	Fenland District Council
FRA	Flood Risk Assessment
GI	Green Infrastructure
GTANA	Gypsy and Traveller Accommodation Needs Assessment
ha	Hectare
HELAA	Housing and Economic Land Availability Assessment
HLF	Heritage Lottery Fund
HRA	Habitats Regulation Assessment
HSEHA	Health and Safety Executive Hazard Areas
IDB	Internal Drainage Board
KRSC	Key Rural Service Centres
KLATS	King's Lynn Area Transportation Strategy
LDS	Local Development Scheme
LLFA	Lead Local Flood Authority
LPSO	Local Plan Sustainability Objectives
NCC	Norfolk County Council
NE	Natural England
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NORA	The Nar Ouse Regeneration Area
NWT	Norfolk Wildlife Trust
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RV	Rural Village
RAF	Royal Air Force
RLA	Residential Land Assessment
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADMP	Site Allocation and Development Management Policies Plan
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSF	Site Sustainability Factors
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Drainage systems
SVAH	Smaller Villages and Hamlets
SWMP	Surface Water Management Plan
THI	Townscape Heritage Initiative
UPC	Un-attributable Population Change

### **11.1**

**Is there evidence that any elements of the proposed development west of Burrowgate Road (F3.1) are not justified, sustainable, viable, available or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?**

## **1. Justification**

- 1.1. BCKLWN administrative boundaries run to the east of the Fenland town of Wisbech. While the town itself falls within FDC it is a sustainable location for strategic growth, as agreed in the Core Strategy. The adopted CS identified in the Settlement Hierarchy (Policy CS02) the Wisbech Fringe as one of the 'Settlements adjacent to the main towns'. Policy CS09 stated that 'provision will be made for at least 550 new dwellings'. This recognises the role of Wisbech as a service centre for the rural hinterland. The Core Strategy Diagram illustrates the Potential Urban Expansion at Wisbech.
- 1.2. Policy F3.1 sets out the Council's allocation for the Wisbech Fringe, and the requirements for any development on site. Following the policy (paragraphs F3.5 to F3.10) is a detailed justification for the allocation.
- 1.3. Transport and traffic movements are a significant issue for the town of Wisbech. FDC has carried out the Wisbech Area Transport Study which includes information, evidence and modelling about East Wisbech, in the context of the town and the Local Plan policies. Later tests included the proposed development in BCKLWN area. Most recently the Wisbech Traffic Model Strategic Development Sites (Mar 2015) has been produced which modelled the anticipated growth and the initial design/ details of access points from the East Wisbech Development Group work. This also highlights some of the potential issues/ constraints with some of the alternative sites proposed. The next stage is more detailed modelling to test the existing junctions and routes to serve the allocations, to identify and unpack the best transport solutions for the town. In conclusion the evidence shows that there are solutions to manage the increase in traffic movements to enable development on the site; i.e. there are no fundamental transport constraints to the site coming forward.

## **2. Deliverable / Cross boundary Approach**

- 2.1. FDC and BCKLWN have worked together on the approach to planning new development at East Wisbech since the Core Strategy in 2010. FDC's Local Plan was adopted in 2014, and identified two relevant policies LP7 Urban Extensions and LP8 Wisbech to guide development in Fenland. The Statement of Common Ground with FDC (Appendix 1) identifies the cross-boundary working and the historical background of this. It also clarifies FDC support for F3.1, reflecting the fact that the policies are consistent and specify the same approach.

## **3. Viable/ Deliverable**

- 3.1. The deliverability forms prepared by/ on behalf of the landowners identify the land to be vacant, available now and deliverable within the first 5 years of the plan period. The HELAA anticipates that development will start to deliver homes on site from year 3 of the plan period up to year 12.
- 3.2. BCKLWN and FDC have established as East Wisbech Development Group. This includes NCC, CCC Highways England, ATLAS and local landowners /planning agents. The role of the group is to work together to bring forward the wider allocation for development. The landowners/ agents have all been identified and kept informed of the process. The vast majority of the landowners are represented by two planning agents. They have been positive and supportive of the policy approach and the Group. Work to date has included consideration of consultation responses received to date, and identifying the shared baseline information we have available. Specifically we have looked into the transport issues for Wisbech and discussed these at length with CCC. We have held meetings with NCC and CC Education departments to progress discussions on potential educational needs in the town. Also investigation into the utilities companies and drainage, as well as health and social needs.
- 3.3. Work to deliver a Concept Plan/ Master plan will provide certainty and enable planning applications to come forward. Given the nature of development locally and the various land owners it seems likely the site may come forward as a series of smaller parcels of land. ATLAS has recently been engaged to work with both local planning authorities to assist in the delivery of the site, and we are currently looking at project planning the work of the Development Group, and considering community engagement options for the site. The Council and East Wisbech Development Group have agreed a Statement of Common Ground to identify support for the policy and a group approach to delivery (included in Appendix 2).

#### **4. Availability / Consideration of Alternatives**

- 4.1. The land put forward was amongst a number of other parcels of land being promoted to the east of Wisbech. The SA (pages 397-401) considered the alternative options to the proposed allocation. Site F3.1 scored generally better than the alternatives put forward, specifically in terms of Flood Risk, Highways and Transport, and Landscape and Amenity which were areas of weakness for the alternative options. Members and officers visited the range of sites on a number of occasions and throughout the process have preferred this location.
- 4.2. A significant factor in the site selection is the proximity of this site to the adjoining FDC allocation LP8, creating a wider allocation. This will enable the local planning authorities to take a comprehensive approach to development to the east of the town. The land allocated in West Norfolk is sufficient to meet the 550 homes, and therefore it is considered that this is the most sustainable option for growth in Wisbech.

## 5. Proposed amendment to Policy F3.1 and supporting text

Page No	Paragraph/Policy no.	Issue	Proposed Change	Justification	Representation Reference number/name	Comment ID
167	Policy E3.1 Wisbech	EA representation requests an additional point to prepare a SSFRA.	Add an additional condition to the policy-  J. submission of a Site Specific Flood Risk Assessment.	EA representation request	Environment Agency	923
167	Policy E3.1	FDC representation requests an additional point	Add and additional condition to the policy-  I. the provision of a site for a new local centre to serve the wider allocation, at a location to be determined.	FDC representation (withdrawn on 18/6/15)	FDC	1267

### 11.2:

**Is policy F3.1 compatible with any policy adopted by Fenland District Council for the land to the west (within Fenland District)?**

6. Policy F3.1 is entirely compatible with FDC policies LP7 and LP8 for their allocation to the east of Wisbech. They list similar requirements and the need for a Broad Concept Plan/ Master plan for the wider development area, to be jointly agreed by both FDC and BCKLWN. The Statement of Common Ground (Appendix 1) between the authorities provides certainty that FDC supports policy F3.1, and that the authorities will continue to work together to deliver the site through the East Wisbech Development Group.

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## **Appendix 1 – Statement of Common Ground with Fenland District Council**

### **Examination of:**

**King's Lynn and West Norfolk**

**Site Allocations and Development Management Policies Document**

# **Statement of Common Ground**

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### **Between**

- The Borough Council of King's Lynn and West Norfolk (the Council), and
- Fenland District Council

### **Regarding**

- Policy E3.1 Wisbech Fringe – Land east of Wisbech (west of Burrowgate Road)

**Date: 26 June 2015**

## **1 Introduction**

1.1 This statement of common ground is provided to aid the Inspector examining this plan in understanding the areas of agreement between the key parties in respect of the plan proposals for the Wisbech Fringe allocation (Policy F3.1), and the detail contained in the proposed.

## **2 Background**

2.1 FDC and BCKLWN have been working together for some years to identify, allocate and bring forward a development to form an extension to the east of the town of Wisbech. Appendix 1 includes a note from FDC identifying the historical background and states FDC views on our ongoing joint working approach.

2.2 The wider allocation includes an area of land within FDC administrative boundary, and an area within KLWNBC boundary. Policy F3.1 identifies the KLWNBC allocation, and Policy LP8 of the FDC adopted Local Plan identifies the FDC allocation.

2.3 Growth to the east of Wisbech was first identified in the Core Strategy, adopted in 2011, as a direction of growth for approximately 550 homes in the period up to 2026. FDC supported this policy approach.

2.4 Both local planning authorities have worked with a range of other organisations to develop and co-ordinate proposals for the allocation, and these are the subject of a separate Statement of Common Ground.

### 3 Representations on the Plan.

3.1 Fenland District Council has submitted representations on the Plan.

3.2 For reference, the ID numbers of this representation (in the Council's online consultation portal) ID no. 1267. This objection was later withdrawn by the authority by a letter dated 18 June 2015.

### 4 Summary of Agreed Matters

4.1 Both authorities agree, for the purposes of the plan examination, the following:

- A. **Policy consistency:** The policy criteria and requirements for the development of the sites in Policy F3.1 and LP8 of the adopted FDC Local Plan are entirely consistent. Importantly both policies state that the wider site must be planned in a comprehensive manner, requiring a Broad Concept Plan / Masterplan approach to be agreed by both authorities. Policy F3.1 forms a sound basis for co-ordinating and delivering a sustainable development which meets the Core Strategy requirements.
- B. **Evidence Base:** Policy F3.1 is based on a robust suite of evidence, including extensive transport studies/ modelling, to inform the site selection process through the Sustainability Appraisals. The evidence base will continue to expand as work continues to bring the site forward,
- C. **Deliverability:** Development to meet Policy F3.1 is viable and deliverable based on evidence. The local planning authorities are working together, alongside a range of organisations, to assist in the delivery of the site. Please refer to the East Wisbech Development Group Statement of Common Ground. All are committed to the development of East Wisbech, and this cross-boundary co-operation will be an ongoing relationship through the planning application stages.

### 5 Declaration

5.1 The content of this document is agreed by the parties below for the purposes of the examination of the King's Lynn and West Norfolk Site Allocations and Development Management Policies Document.

Name: Wendy Otter, Transport Development Manager

For and on behalf of: Fenland District Council

Signed: 

Date: 26 June 2015

Name: Alan Gomm, LDF Manager

For and on behalf of: The Borough Council of King's Lynn and West Norfolk

Signed: 

Date: 29/6/15



## Appendix 1

### **Kings Lynn and West Norfolk Site Allocations and Development Management Policies Document**

#### **Information for the Statement of Common Ground/Duty to Co-operate produced by Fenland District Council**

#### **Historical Background**

<b><u>Timeframe</u></b>	<b><u>Joint Working Approach</u></b>
2010	A statement of joint working for Wisbech was produced and signed in October 2010 between the two Planning Authorities. This committed our two authorities to work together. This was submitted by the Borough Council as part of the evidence for their Core Strategy Examination in Public, a DPD which is now adopted.
2010	A joint Education Statement was produced setting out an agreed approach and an evidence base for the comprehensive planning of education issues for Wisbech in both Cambridgeshire and Norfolk. The two planning authorities worked with and assisted the two education authorities to prepare this approach.
2012	A Memorandum of Understanding was produced in November 2012 between FDC and the Borough Council of Kings Lynn and West Norfolk in respect of growth at East Wisbech. This was to support preferred options work in the preparation of the Borough Council of Kings Lynn and West Norfolk site allocations and Development Management Policies DPD.
2013	The Borough Council of Kings Lynn and West Norfolk produced a letter supporting the Fenland Local Plan for the examination in public during December 2013.
2013	<p>During 2013 a Statement of Common Ground was produced by FDC, the Borough Council of Kings Lynn and West Norfolk, Highways Agency, Cambridgeshire County Council and Norfolk County Council. This statement relates to areas of common ground in respect of A47 in Cambridgeshire and Norfolk to support the Fenland District Council Local Plan.</p> <p>This statement can be found at this link:  <a href="http://www.fenland.gov.uk/CHttpHandler.ashx?id=8795&amp;p=0">http://www.fenland.gov.uk/CHttpHandler.ashx?id=8795&amp;p=0</a></p>
2014	Following the adoption of Fenland District Council Local Plan in May 2015, a working group was established to develop a Broad Concept Plan (BCP) for East Wisbech. Broad Concept Plans are concerned with an integrated approach for the delivery of an urban extension site. The BCP for East Wisbech is a joint planning authority group coordinated by FDC with full support from the Borough Council of Kings Lynn and West Norfolk.

Timeframe	Joint Working Approach
	<p>The group membership consists of a range of public and private sector partners. The group has met approximately every 3 months to develop proposals for the site. This work is still ongoing and we expect the Broad Concept Plan for East Wisbech to go to FDC Planning Committee for in principal approval in 2016.</p>
2014/15	<p>In addition to the work of the East Wisbech Broad Concept Plan Group, the two planning authorities have also had a range of supplementary meetings to assist the process and provide guidance. These meetings include issues such as:</p> <ul style="list-style-type: none"> <li>• Consideration of the approach to S106 and CIL for East Wisbech</li> <li>• Access and transport issues for East Wisbech</li> <li>• The Borough Council assisted FDC and the East Wisbech project work by facilitating a meeting with ATLAS part of the Homes and Communities Agency. This has led to ATLAS formal support for East Wisbech. The two Planning Authorities have now agreed a Project Engagement Plan setting out ATLAS support.</li> <li>• In 2014 meetings were facilitated with the Education Authorities to update the Joint Education Statement</li> </ul>

In addition to the above please see the Duty to Co-operate Evidence Document – Sept 2013 - See 2.10 on page 6, and Appendix 6 on page 23  
<http://www.fenland.gov.uk/CHttpHandler.ashx?id=8607&p=0>

### **Ongoing Joint Working**

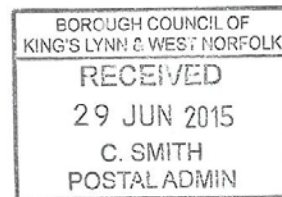
Through the Broad Concept Plan process FDC is committed to the development of the East Wisbech site with the Borough Council of Kings Lynn and West Norfolk Borough Council and the other project partners.

We welcome the inclusion of Policy F3.1 and in particular the issues that the policy is expecting to addressed either prior to the submission of the planning application or as part of the application process. We specifically note the following:

Policy LP8 of the Fenland Local Plan specifics that: *"The proposed access(es) to serve the development must ensure that there is no unacceptably net adverse impact on the local and strategic highway network and on existing residential amenity"*

Fenland District Council welcomes the inclusion of this statement in Policy F3.1 Wisbech Fringe which supports the ongoing work to develop an integrated approach for the East Wisbech site.

## Appendix 2 – Statement of Common Ground with East Wisbech Development Group



**Examination of:**  
**King's Lynn and West Norfolk**  
**Site Allocations and Development Management Policies Document**

# Statement of Common Ground

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Between

- The Borough Council of King's Lynn and West Norfolk (the Council), and
- East Wisbech Development Group

Regarding

- Policy E3.1 Wisbech Fringe – Land east of Wisbech (west of Burrowgate Road)

Date: 26 June 2015

## 1 Introduction

1.1 This statement of common ground is provided to aid the Inspector examining this plan in understanding the areas of agreement between the key parties in respect of the plan proposals for the Wisbech Fringe allocation (Policy F3.1) and the detail contained in the proposed.

## 2 Background

2.1 FDC and BCKLWN have been working together for some years to identify, allocate and bring forward a development to form an extension to the east of the town of Wisbech.

2.2 The wider allocation includes an area of land within FDC administrative boundary, and an area within KLWNBC boundary. Policy F3.1 identifies the KLWNBC allocation, and Policy LP8 of the FDC adopted Local Plan identifies the FDC allocation.

2.3 The local planning authorities have been working with a range of organisations to form an East Wisbech Development Group, to assist in the delivery of the site. This Group includes ATLAS, NCC, CCC, Highways England and the landowners/ agents. It is intended that additional bodies will also become engaged with the Group as required, for example the utilities companies, county education department etc. The Group meets approximately every 2-3 months.

2.4 The landowners/ agents have completed Deliverability Forms to demonstrate that the site is deliverable (viable, available and achievable).

### 3 Representations on the Plan.

3.1 Some members of the Wisbech Development Group have submitted representations on the Council's proposed plan. These representations help to inform this Statement of Common Ground.

3.2 For reference, the ID numbers of these representations (in the Council's online consultation portal) are as follows:

- FDC - ID no. 1267 is now withdrawn and their support clarified by letter (dated 18 June 2015)
- John Maxey (agent) - ID no. 282
- Peter Humphrey (agent) - ID no. 568
- Norfolk County Council - ID no. 91 & 103
- Highways England - ID no. 35

### 4 Summary of Agreed Matters

4.1 Both authorities and the wider Wisbech Development Group agree, for the purposes of the plan examination, the following:

- A. Policy F3.1 forms a sound basis for co-ordinating and delivering a sustainable development which meets the Core Strategy requirements (other than in respect of Mr Maxey's representations under ID no. 282 regarding retention of mature orchard within open space, which objections he maintains).
- B. Development to meet proposed Policy F3.1 is viable and deliverable based on evidence. The local planning authorities are working together, alongside a range of organisations, to assist in the delivery of the site. All are committed to the development of the allocations at East Wisbech, and this cross-boundary co-operation will be an ongoing relationship through to the planning application stages and delivery.

### 5 Declaration

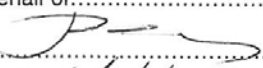
5.1 The content of this document is agreed by the parties below for the purposes of the examination of the King's Lynn and West Norfolk Site Allocations and Development Management Policies Document.

**Name:** Alan Gomm, LDF Manager

**For and on behalf of:** The Borough Council of King's Lynn and West Norfolk

**Signed:**  .....

**Date:** 29/6/15 .....

Name ..... J. R. MAXEY .....  
For and on behalf of ..... MAXEY GROWING & CO LTD .....  
Signed .....  .....  
Date ..... 26/6/15 .....

Name.....  
For and on behalf of.....  
Signed.....  
Date.....