

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 16: Denver (G.28.4)**

**Examination  
November 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
SuD	Sustainable Drainage systems
SVAH	Smaller Villages and Hamlets
SWMP	Surface Water Management Plan
THI	Townscape Heritage Initiative
UPC	Un-attributable Population Change

**16.1:**

**Is there evidence that the Council's restrictive approach to development at Denver is not justified? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?**

1. Introduction

1.1 The SADMP states that Denver, designated as a Rural Village in the Settlement Hierarchy Core Strategy (CS) Policy CS02 and, as indicated by the SADMP's Distribution of Development section would receive an allocation of 8 additional dwellings. However, the Council considers that of the sites put forward none of them are suitable for allocation. The SADMP (page 207, paragraph G.28.4) provides the following reasons for this:

'.... regard to the form and character of the village, which is noted for large areas of undisturbed common land interspersed with a network of wildlife habitats and heritage assets and to the servicing / access constraints.....'

1.2. These reasons are explored, in detail, in relation to the sites proposed for growth within the Council's SA Report (SA01) (page 111).

2. Landscape Character

2.1 The rural village of Denver has broadly a linear form. The BCKLWN's Landscape Character Assessment (2007) (LCA) (page 105) (DCS04) defines Denver as having strong historic integrity with historic features which includes moated sites and areas of common land. The landscape planning guidance within the LCA states:

- Ensure that any new appropriate development responds to historic settlement pattern and is well integrated into the surrounding landscape.

- Seek to conserve the setting of historic features within the character area.

### 3. Alternative Options

3.1 The Council considers that there were no suitable sites proposed for residential development for Denver. The sites that were put forward as growth options are compared and discussed within SA01.

3.2 At the Preferred Options Stage (2013) Site DEN1, which comprised a smaller portion of submitted Site 662, was proposed for allocation. However following comments from the Preferred Options Consultation (2013), further constraints to the proposed allocation became apparent and informed SA01. Access to the site was to be in the form of a metalled road across a strip of common land, which constitutes development; the ownership of this land was unclear as to whether multiple parties enjoyed a right of way and/or grazing rights. The servicing of the site therefore would likely result in disruption to undisturbed common land. The site itself encompasses a pond where the presence of Great Crested Newts maybe evident, as referenced by Denver Parish Council. There is also a heritage asset in form of the Grade II listed Manor House Farm House close by and development of the DEN1 could have an impact upon it's setting. An indicative scheme for the site has been submitted by the agent however this does not overcome the constraints outlined.

3.3 Site 312, 518 & 853 was another site proposed for allocation however, information relating to the impact upon heritage assets and access issues rendered it inappropriate for allocation. This site includes an identified heritage asset, the surviving earthwork remains of a medieval moat associated with West Hall manor and the potential for further heritage assets with archaeological interest (buried archaeological remains) to be present, the extents of which are not known. There was insufficient information, given the presence of heritage assets to demonstrate that the principle of development at this site would be acceptable. The proposed

access arrangements for the site proved to be unacceptable with the local Highway Authority raising objection as the highway network surrounding the site is inadequate to serve additional vehicular trips. A scheme for the site was submitted by the agent that indicated a substantially higher number of dwellings than was being sought at this location.

3.4 As explained within SA01 Site 519 is not chosen for allocation as the development would likely take place in a non-linear form as the site frontage is limited, the local Highway Authority have raised an objection to the site. The site is constrained by its surroundings with a large caravan park to the north, the park's access is adjacent to Site 519 and there is a poultry unit directly to the west, both of these facilities could potentially impact negatively upon the amenity of any new residents.

#### 4. Proposed Modification

4.1 Although the Site DEN1 (part of 662) is assessed within SA01 it doesn't appear on the map. It is proposed to publish a replacement map for Denver that is displayed on page 115 of SA01. The proposed amended map can be viewed as Appendix 1 of this statement.

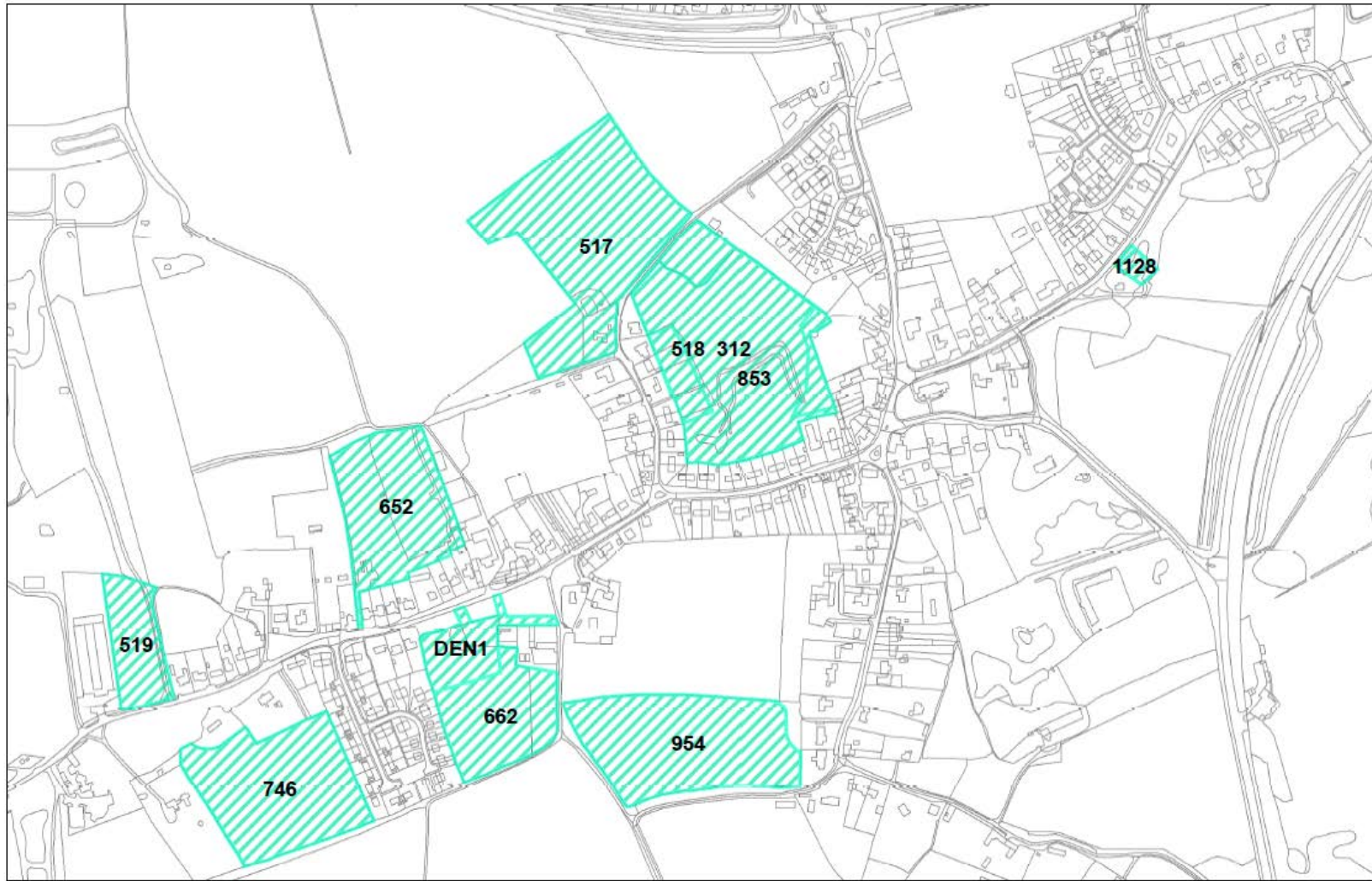
#### 5. Conclusion

5.1 Clearly Denver is a distinct village with its own characteristics and any site that is chosen for allocation would need to complement its surroundings. The sites proposed have been assessed within this context by the SA01 and on balance no site was deemed appropriate for allocation with a number / combination of constraints having been identified. Therefore despite the Council's approach in seeking to allocate a residential development of 8 dwellings within Denver, this aspiration has not been realised.

5.2 It is however acknowledged that Denver lies a short distance from Downham Market and therefore an appreciation of the relationship between the two settlements has to be taken into account. The strategic site allocation F1.4 proposed by the SADMP at Downham Market, for 140 dwellings, is within close proximity of Denver and indeed there are current pedestrian and cycle links between the village and the strategic site.

5.3 Although, as discussed, a site could not be sought for allocation from those proposed, an element of residential development could still come forward within the plan period from other sources i.e. windfall.

### Appendix 1: Proposed amended SA01 inset map for Denver



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Denver

