

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 17: Dersingham (G.29.1; G.29.2)  
and Docking (G.30.1)**

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

## 17.1

### **Is there evidence that development in either of these settlements would have unacceptable impacts on highway safety or to any heritage assets?**

#### 1. Introduction

1.1. This statement will address matters raised in Dersingham and Docking regarding heritage issues raised by Historic England and regarding transport issues raised by Norfolk County Council Highways Authority and Dersingham Parish Council.

#### 2. Site Specific Issues – Dersingham

##### 2.1. G29.2 Land at Manor Road

##### 2.2. Impact on Highway Safety

2.2.1.1. The representation submitted by Norfolk County Council as Highways Authority (Claire Sullivan ID:784926) seeks a modification to Policy G29.2 Dersingham – Land at Manor Road to require the closure of the existing access via Church Road / Manor Road junction in order to overcome their objection to development of the site.

2.2.1.2. Correspondence between the site owners (Sandringham Estate, Ann Butcher), Create Consult Engineers (Phillip Porter) and Norfolk County Council (Darren Mortimer, Highways Development Management Officer) dated 12th-23rd June confirms the resolution of alternative access options (see attached appendix 1).

2.2.1.3. The Council proposes a modification to Policy G29.2 Dersingham – Land at Manor Road to overcome the objection by Norfolk County Council Highways Authority and to propose a new access on Church Lane which is subject to agreement by the Highways Authority prior to development.

##### 2.3. Impact on heritage assets

2.3.1.1. The representation submitted by Historic England (Mr Tom Gilbert-Wooldridge ID: 56252) concludes that the site is not justified, nor effective or deliverable against considerable heritage constraints and not consistent with national policy. It would cause harm to the

significance of several heritage assets and not comply with the NPPF.

2.3.1.2. The Council has acknowledged the sensitivity of the location in the text accompanying the policy and in the SA and has included clauses in the policy to ensure the design of any development will respect its setting. The boundary of the walled garden will be retained (except at the new access point) and the housing will be single story in height. The appellant argues that the site forms an attractive paddock, but there is only one view into the paddock through the entrance and were the gates to be closed by the occupier then it would form a very private walled garden area. It is considered that the main contribution to the Conservation Area is the historic walls which would largely be retained (except for the new access).

2.3.1.3. Public views towards the Grade I Listed Church of St. Nicholas and the Scheduled Ancient Monument would be unchanged by this development. The only visible difference would be the appearance of new roofs (using local materials subject to approval) seen at the top of the boundary walls. The Council considers that there is no evidence to suggest that development in this location would cause unacceptable harm to heritage assets.

#### 2.4. G29.1 Land north of Doddshill Road

#### 2.5. Impact on highway safety

2.5.1.1. The representation from Dersingham Parish Council (Sarah Bristow ID: 503003) raises concerns on the safety of pedestrians in the vicinity of the proposed development site, particularly children walking to school.

2.5.1.2. Dersingham Parish Council have also raised the question of whether the disused community centre site could be used to widen the narrow access at the junction between Doddshill Road and Manor Road which the agent on behalf of the landowner confirms is possible in his representation (Mr Adrian Parker ID: 134084).

2.5.1.3. No objections were received from Norfolk County Council Highways Authority.

2.5.1.4. The opportunities to improve road safety as a result of this development outweigh any negative impact of an increase in the

number of road users resulting from this development. The proposed upgrade to the junction at the western end of Doddshill Road would result in a marked improvement to the safety of all road users. New development will result in an improved footpath network alongside the linear shaped site and is likely to result in road users slowing down out of necessity to enable new residents to access their properties.

## 2.6. Impact on heritage assets

2.6.1.1. The representation submitted by Historic England (Mr Tom Gilbert-Wooldridge ID: 56252) concludes that they do not oppose the allocation of this site, but do have some concerns regarding potential impacts on the historic environment, including the Conservation Area. The representation largely concerns the effect of the proposed layout and density of the site on the approach to the Conservation Area to the East. There is no evidence to suggest that development in this location will harm the Conservation Area or its immediate setting and the Council would clearly envisage any development which would respect the character in terms of design, layout and height of dwellings with the surrounding area. The policy restricts the number of dwellings on the site to 20 and the Council does not propose any modification to this number. The Council does not consider that development in this location would cause unacceptable harm to any heritage assets.

## 3. Site Specific Issues – Docking

### 3.1. G30.1 Land situated off Pound Lane (Manor Road)

### 3.2. Impact on highway safety

3.2.1.1. No representations were received regarding highway safety in Docking.

### 3.3. Impact on heritage assets

3.3.1.1. The representation submitted by Historic England (Mr Tom Gilbert-Wooldridge ID: 56252) raises concern regarding the proposed allocation of this site and its impact on the historic environment. The representation states it is a large site to the north of the Conservation Area that forms a rural backdrop as one enters or leaves Docking along Pound Lane and Sandy/Bradmere Lane. The site is bounded by significant trees on its eastern, south-

eastern, southern and south-western sides, and that the overall density will be low, but there is still potential for harm. While the policy requires that development addresses the setting of the conservation area and the submission of a Heritage Statement, they remain cautious about the merits of allocating this site.

3.3.1.2. When assessing the impact on the historic environment, the key considerations for the Council were the impact of development on the setting of the Conservation Area and adjacent Listed Buildings on the western and south western boundary (Manor Farm/Manor House and The Old Post Office). As noted by Historic England, the site is well screened by significant trees which are of a considerable height and because the vegetation is well established and dense there are no views towards and from the Conservation Area and the Listed Buildings. The policy seeks the incorporation of a high quality landscaping scheme including the retention of existing hedgerow, where possible, to the west and south boundaries and the landowner has expressed intention to retain existing trees and hedgerow shown in an early draft layout scheme for the site (appendix 1).

3.3.1.3. When entering Pound Lane it is clear that the area is quiet and rural in nature and therefore the Council seek to achieve a development which would complement the rural setting. The site boundary was drawn purposely large to enable a very low density development which was envisaged to be built of an exceptional quality using local materials to reflect the rural character of the area. The addition of a more ecologically enhanced pond as a central feature would contribute to the feeling of openness in the site and retain an element of Dockings rural heritage which is currently overlooked and not publicly accessible. The extensive boundary of the site affords a number of options for the layout of residential development. The Council would welcome discussion with Historic England and the developer to consider the detailed design, layout and materials for the site in order to create a development which preserved and enhanced the setting of the Conservation Area.

3.3.1.4. The merits of allocating the site over alternative options are detailed in the Councils SA. The Council does not consider that there is any evidence that development in this location would have an unacceptable impact on heritage assets.

#### 4. Comparison of alternative options

4.1. The two allocated sites in Dersingham were the only sites submitted for consideration in the village and therefore there were no alternative options for comparison.

4.2. The Council's SA details the comparison of alternative options in Docking. The central village location of site G30.1 (land situated off Pound Lane) specifically provides good walking access to village services and was therefore considered to be the most sustainable option for development. Whilst the alternative options would have a negligible impact on the heritage criterion, all options have the potential to impact on landscape and amenity (as most are located on the outskirts of the village) and therefore in weighing all options the Council consider that site G30.1 is the most sustainable location for development and offers the opportunity to enhance the ecological value of the pond on site.

## 5. Proposed Modification

### 5.1. Policy G29.2 Dersingham – Land at Manor Road

5.1.1.1. Delete clause 1 of the current policy (page 213) and replace with wording as below:

- Provision of safe access via Church Lane following the removal of part of the wall and the closure of existing access onto Manor Road/Church Lane junction. Details of this shall be submitted and agreed by Norfolk County Council Highways Authority as part of the planning application.

## 6. Conclusion

6.1. The Council considers that there is no evidence that development in either Dersingham or Docking would have unacceptable impacts on highway safety or to any heritage assets. In comparing alternative options in Dersingham, no other development opportunity exists.

6.2. Following comparison of alternative options in Docking, the central location of site G30.1 means it is considered the most sustainable of all options for development. The Council proposes a modification to Policy G29.2 Dersingham – Land at Manor Road to amend the proposed access point in order to overcome an objection made by the Highways Authority.