

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 28: Marshland St. James (G.57)

**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

28.1

Is there evidence that the Council's approach to development at Marshland St James is 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. Introduction

1.1 The Council's Sustainability Appraisal (SA01) demonstrates that of all the proposed options for growth for Marshland St. James / St. John's Fen End / Tilney Fen End Site G57.1 and Site G57.2 are considered to be the most sustainable options for residential development and therefore are chosen for allocation, as set out in the SADMP. This is further explained in the supporting text accompanying the policies within the SADMP.

1.2 The Deliverability Form prepared by the landowner of G57.1, dated 22/04/2014, indicates that the site is available now and that there is a desire for the site to be delivered within the first 5 years of SADMP adoption. As does the Deliverability Form completed by the landowner of G57.2, dated 23/11/2014, (CIV13).

2. Approach to Development at Marshland St. James / St. John's Fen End / Tilney Fen End and Comparison of the Growth Options

2.1 The Council's Sustainability Appraisal (SA01) details the consideration of all alternative options, and the reasons why these were not considered the most sustainable options for development. All of the sites proposed in this Rural Village (RV) have identified constraints due to the nature of the settlement (highway network, landscape, high grade agricultural land, flood etc.) and that in the interest of delivering development in a RV; the Council has chosen the least constrained and therefore most sustainable options for development.

2.2 The Council's approach to distributing development, as set out in the SADMP, seeks to allocate 12 dwellings within this RV. At the Preferred

Options Stage (2011) the desired number of minimum dwellings was met by one site being allocated, G57.1 (formally referred to as MSJ1).

2.3 As a response to the Preferred Options consultation there was a local desire for development to be spread around the village. A further site, G57.2, was chosen for allocation by reviewing all of the previously submitted sites and newly submitted sites at that stage, this can be viewed within SA01.

2.4 As the SADMP explains the settlement is wholly constrained by Flood Zone 3 as identified by the Borough's Strategic Flood Risk Assessment (SFRA). Consequently none of the available sites are at a lower risk of flooding than the allocated sites. SADMP Appendix 4 sets out the joint approach agreed between the Borough Council and the Environment Agency (EA) in using the Council's Strategic Flood Risk Assessment (FW01) and the EA's Tidal Hazard Mapping (FW01) in relation to site allocations.

2.5 One alternative growth option was Site 88 & 792. NCC HA provided the following response as part of their 'Consultation Response to Local Development Framework' (July 2012):

792	3. This allocation is remote from the settlement. The Highway Authority would object if this site were included in the plan.
88/792	3. The site is remote and the footway provision to the local school is inadequate, with no realistic possibility of improvement. This site should not be considered for housing

Assessment Key

1.	Favourable site
2.	The site does have limitations but it is felt that these can be overcome.
3.	We would object to this site

2.6 The above responses were one of the reasons the site didn't score as highly within SA01 as the sites chosen for allocation.

2.7 In relation to Site 1251, this was not chosen for allocation for reasons detailed within SA01. In addition members of the LDF Task Group visited

all of the sites and agreed with the assessment recommendations detailed within SA01.

2.8A new site was submitted at the SADMP Pre-Submission (2015). Planning permission had been sought on the site, but the application was withdrawn (15/00263/F), for four terraced style dwellings. This indicates that site is potentially only capable of providing four dwellings due to its size and shape, and therefore is unlikely to be able to accommodate a minimum of 5 dwellings as sought by the SADMP. An initial appreciation of the site is given below, in the form consistent with SA01 but without consultation responses:

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
NEW MSJ SITE	++	+	o	xx	xx	o	?	o	o	?

2.9 As can be seen in the above assessment table the new site scores highly in relation to 'access to services' as it is located close to the school and other local services i.e. the village pub. Development of the site would not impact on 'heritage', 'natural environment' or 'landscape and amenity'. The site performs poorly in relation to the indicators 'food production' with the loss of very good agricultural land (grade 2) and 'flood risk' as it is located in a high flood risk zone (FZ3) however this is a constraint of the settlement and consequently the same applies for all of growth options. The settlement pattern created could be a linear frontage as seen throughout the village; however as demonstrated by the recent planning application development, terrace style would not be in-keeping with the existing settlement pattern at this locality.

2.10 This site has now been granted permission for four dwellings, 15/00985/F, in September, for the construction of terraced housing consisting 2 x 2 bedroom and 2 x 3 bedroom dwellings.

3. Proposed Modification

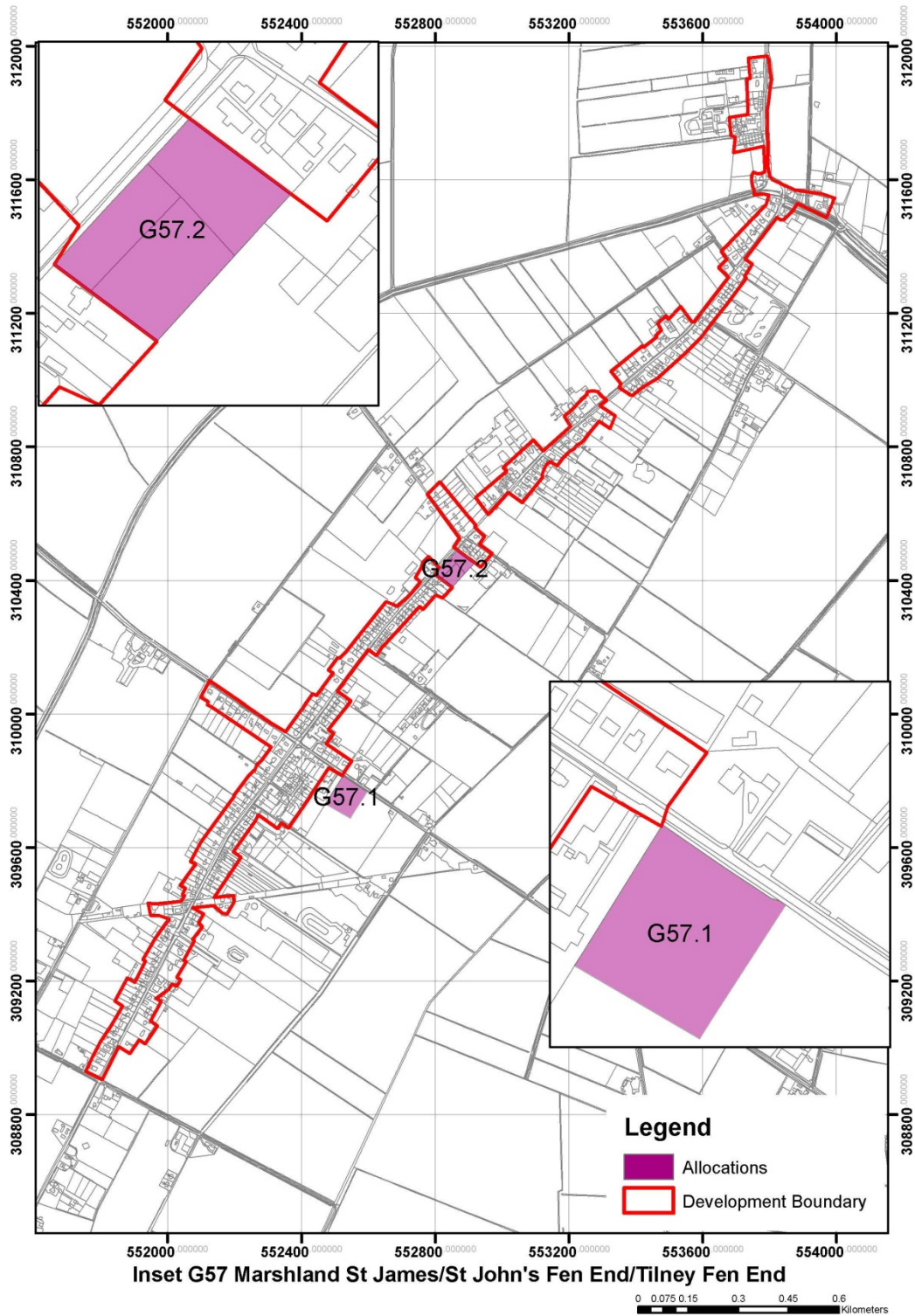
3.1 The Council proposes the following modification to allocated Site G57.2. Correct the geographical representation of the site, as seen on page 238 of the SADMP titled: '*Inset G57 Marshland St James/St John's Fen End/Tilney Fen End*'.

The north east boundary of the site as shown encompasses an adjacent dwelling and associated rear garden; these elements should be removed from the allocation. The proposed amend inset can be viewed as Appendix 1 of this statement.

4. Conclusion

4.1 The Council considers that the proposed residential development sites in Marshland St James are justified, sustainable, viable, available and deliverable.

Appendix 1: Amended Inset G57 Marshland St James/ St John's Fen End/Tilney Fen End



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