

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 26: Hilgay (G.48)

**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

26.1:

Is there evidence that any elements of the proposed development south of Foresters Avenue (G48.1) 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. Introduction

1.1. The Council's Sustainability Appraisal (SA01) demonstrates that of all the proposed options for growth for Hilgay, Site G48.1 Land south of Foresters Avenue, part of submitted site Ref. No. 801, is considered to be the most sustainable option for residential development and therefore is chosen for allocation as set out in the SADMP.

1.2. This is further explained in the supporting text accompanying the policy within the SADMP, page 269.

1.3. The Deliverability Forms prepared by the landowner of G48.1, dated 21/05/2015 and 12/06/2015, indicate that the site is available now and that there is a desire for the site to be deliverable within the first 5 years of SADMP adoption (CIV13).

2. 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 option for development. All of the sites proposed in Hilgay have identified constraints due to the nature of the settlement (highway network, landscape, high grade agricultural land etc.) and that in the interest of delivering development in a Rural Village (RV) the Council has chosen the least constrained and therefore most sustainable option for development.

2.2. The Council's approach to distributing development as set out the SADMP seeks to allocate 12 dwellings within the RV of Hilgay.

2.3. The 2011 SHLAA after its stage 1 assessment does state 'no identified severe constraints' for Site 975, this would have been based on the information available at this time and allowed the 975 to progress for further assessment, and indeed the SHLAA 2011 also states 'Site requires comparative assessment in the Site Specific Allocations and Policies DPD'. The site was considered at this time acceptable. Site 801 was only considered partially acceptable due to the size of the site. Hence both sites received this status and appeared as such on the SHLAA map sheet for

Hilgay. The position of sites within the SHLAA 2011 is updated by HELAA 2014. It is important to note that a SHLAA and HELAA are technical studies and not policy documents. They do not allocate sites for development and the inclusion of any site within them provides no guarantee of it being permitted for development. Similarly, the non-inclusion of a site does not preclude future development, providing proposals meet planning policies in place at the time that a site comes forward.

2.4. At the Issues and Options stage (2011) a similar designation was afforded the two sites for the same reason, potential options for housing and potential options for housing (partial). Neither of the sites presented on the accompanying map for Hilgay were favoured by the council over another, and views in relation to the sites were invited.

2.5. At the Preferred Options stage (2013) Site HIL1, which is the same site as G48.1, comprising a smaller portion of Site 801 was proposed as the Council's preferred option for development in Hilgay. At this stage the reasons for this were:

- 'This site is a less sensitive location within the settlement as it has the potential for natural screening in comparison to the other options considered. Parish Councils preferred location for development'.

2.6. Views again were invited in relation to HIL1 and if there was a more suitable site to accommodate around 12 dwellings to ascertain the Council's preferred site. The Preferred Options stage was the first time in the SADMP process that the Council had published a preferred option for residential development in Hilgay.

2.7. The SADMP Pre-Submission document (2015) continued with the chosen part of Site 801 that was identified as a preferred option at the previous stage. Reasons for this are provided within the SADMP site description and justification text supporting the policy, page 269, and within SA01.

2.8. Site G48.1 was chosen for allocation as the site could provide the number of dwellings being sought at a density consistent with the local settlement pattern. Due to the nature of the settlement new development would be screened naturally by established vegetation, and is a distance, from the A10. The site would also be screened by existing residential development along Tower Road and Ely Road. Limited long and short distance views of the developed site would be seen in the context of the existing settlement, as in essence it would form a small extension to a larger residential estate style development. Whilst the site is not constraint free, it is considered to be the

least constrained and the policy contains clauses addressing the identified constraints.

2.9. It is unlikely that Site 975 could be capable of providing the desired number of dwellings at a density and dwelling style consistent with the settlement pattern at this location. The site would not be screened as well as other sites, as it faces the frontage of a number of properties along East End. The site has been identified by Historic England, formally English Heritage, as having potential impact on the setting of the Scheduled Moated Site. It is also the closest site to a County Wildlife Site. Planning permission was granted for a single dwelling in the same locality as Site 975; however this was gained on appeal and was originally refused by the Council (08/02435/F).

3. Conclusion

3.1. The Council considers that the proposed residential development site in Hilgay is justified, sustainable, viable, available and deliverable.