

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 45: Wighenhall St. Germans

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

45.1:

Is there evidence that the Council's restrictive approach to development at Wighenhall St Germans 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 Council originally sought to allocate twelve dwellings in Wighenhall St. Germans in the SADMP document. Numerous sites were submitted for consideration in the settlement and site WSG1 was selected and proposed for allocation at preferred options stage. The Pre-Submission document subsequently made no allocations in Wighenhall St. Germans as all sites had identified constraints to development. Further representation from Phillip Kew (ID: 820490) on behalf of site 1088/987(WSG1) disputed the reasons for not allocating site 1088/987(WSG1). This statement addresses question 45.1 and justifies the Council's decision not to allocate in Wighenhall St. Germans.

2. Comparison of alternative options

- 2.1. The SA provides a detailed assessment of the options submitted for development in Wighenhall St Germans. All sites score negatively against two or more criterion and this is explained in detail in the SA discussion. To address the representations in support of site 1088/967(WSG1) it is necessary to elaborate the reasons for not allocating this site.
- 2.2. The Parish Council raised concerns regarding site WSG1 at the Preferred Options stage but neither objected to nor supported the site, Natural England objects to site WSG1. The response to the 'preferred options' consultation was not of a scale to indicate the general public consensus on a favoured site.
- 2.3. Site WSG1 (Part of site 967 and 1088) offers an opportunity for development that is in keeping with the general form and pattern of development in the village. However the preferred options consultation raised two main issues regarding site WSG1:
- Site 967 (part of WSG1) is within a SSSI and Natural England objects to its allocation. Site 1088 (part of WSG1) borders a SSSI and Natural England raises concerns and requests that evidence is provided to demonstrate that development would not be detrimental to the adjacent SSSI.

- The Highway Authority would only support access from Sluice road, as Lewis Drive is limited and can serve only a maximum of 5 dwellings. However, the designation of site 967 as an SSSI means that access is not obtainable from Sluice Road. Therefore, based on the identification of the SSSI and the lack of suitable access from Lewis Drive, it is considered that site WSG1 is not suitable for allocation.

2.4. The potential to allocate alternative site options was considered following the preferred options consultation. Of the other available site options, site WSG01 was constrained by the potential negative impacts to the character of the area.

2.5. Representation from Mr David Carter (ID: 892351) seeks housing allocation on land at Fitton Road Wiggenhall St. Germans (Illustrated in Appendix 1). This representation proposes land which is available and suitable for residential development whilst removing the industrial use of the canning factory which currently sits on the land. However, this action would go against policy CS10 which seeks to retain existing employment uses in rural areas, a principle which has been applied elsewhere throughout this proposed document. This site was not put forward for consideration into the Local Plan call for sites and as such was not presented at the Preferred Options stage of the plan process. Further issues such as the risk of flooding, which were noted in the SA with other sites, are present with this site also.

2.6. Representation made by Mrs S Winter promotes a site off Mill Road in Wiggenhall St. Germans (Illustrated in Appendix 1). This site, labelled as New Site 2015 in Appendix 1, was not put forward for consideration into the Local Plan call for sites and as such was not presented at the Preferred Options stage of the plan process. This site is located on the edge of the settlement, adjacent to the development boundary and, as is the case with all the sites in this area; is subject to high flood risk zones (FZ3) and Hazard Zone. A Public Right of Way is in place on the eastern boundary of the site which must be kept in place. The site scores well when put through the SA process in comparison to the existing sites put forward for this area. An Outline application for construction of 4 detached houses, reference 15/01509/O, which includes a Flood Risk Assessment, has been submitted to the Council for this site and is pending consideration.

3. Impact on highways

3.1. In relation to the preferred site option, the Highways Authority views are mentioned above. Site 547/1067 has also been scored negatively also as the local highway network is inadequate to support significant additional development.

3.2. In relation to the site labelled New Site 2015, the Highways Authority argues this site is not a good location for a site. Feedback from the Highway Authority stated that Mill Road is a narrow road, with no footpaths and limited verges. The site is remote from the village centre, particularly the school and has no safe walking route to local services. However it is a small site which could not accommodate the required allocation (12 units) in an acceptable manner. As noted a much smaller development is sought through planning application 15/01509/O. The opportunity to allocate land for residential development of 5 dwellings is proposed for this site. The site offers an opportunity for linear development of the road as there is existing, road frontage development to the east and west of the site.

4. Restrictive approach to development

4.1. Section D of the SADMP document explains the Council's method of distributing development and states in paragraph D.1.15 that this general approach is not rigidly applied and that some settlements are more constrained than others. Whilst the Council would prefer to allocate 12 dwellings in Wiggenhall St. Germans this is not a strategically significant allocation in terms of housing delivery. It is not considered that the lack of an allocation in Wiggenhall St. Germans village would cause the plan to be unsound, or that the Council have been unnecessarily restrictive in this case. With the submission of the site off Mill Road, the Council wishes to allocate this land for residential development of 5 dwellings and therefore answering the question of the Council being restrictive in its approach to development.

5. Conclusion

5.1. The Council originally identified 1088/987(WSG1) as a preferred option for 12 dwellings and this statement explains the reasons why it was not pursued as an allocation at pre-submission stage. The Council do not consider the approach to development in Wiggenhall St. Germans to be overly restrictive. The Council sought to allocate 12 dwellings in Wiggenhall St. Germans but chose not to submit an allocation in the SADMP at an earlier stage because all submitted sites were identified as constrained and had received objections from one or more public bodies. Following the late submission of the site on Mill Road, the opportunity to allocate 5 dwellings on this site is put forward to make a positive contribution to the area in terms of housing delivery.

Appendix 1: Location of Fitton Road site and New Site 2015

