

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 40: Watlington (G.112)

**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

40.1:

Is there evidence that any elements of the proposed development of Thieves Bridge Road (G112.1) 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. Watlington is identified as a Key Rural Service Centre and the Council seek an allocation of 32 dwellings in the village in the SADMP. The Sustainability Appraisal details the consideration of options for development in Watlington and provides justification for allocating site G.112 Land south of Thieves Bridge Road over alternative options.

1.2. The deliverability form (Appendix 1) prepared by the landowner states that the site is currently occupied by an agricultural tenant. They clarify that they are preparing to submit a planning application for residential development within the next 12 months and therefore they would aim to build within the first five years of the plan period (2014/15-2018/19).

1.3. Two representations made during the Pre-Submission consultation object to the proposed allocation and seek additional allocations in Watlington to meet the Boroughs objectively assessed need. Representation by Bennett Plc (William Arkell ID: 786487) argues that the site is not justified on the grounds that the site would have a negative impact on landscape and amenity, the site is not preferable in terms of access to alternative options, will not deliver additional benefits to the public in comparison with alternative options and that it is not the most sustainable site. Representation by Emery Planning Partnership on behalf of A W Dean (ID: 402843) suggest that the site may not be deliverable on the basis of the presence of minerals and suggests that the site will not deliver additional benefits to the public in comparison with alternative option site 580.

2. Issues raised

2.1. Insufficient allocation in Watlington

2.1.1. Watlington has a variety of services and a rail station and is therefore a generally sustainable location for further growth. Whilst Watlington may have a greater level of service provision than many comparable villages defined as Key Rural Services in the Borough it does not have the highest population size. Distribution of development is described in detail in section D.1 of the SADMP and outlines that the level of allocation

sought in each Key Rural Service Centre is broadly apportioned to population size. The Council consider that approximately 32 dwellings constitutes an appropriate level of growth in Watlington village and that none of the submitted sites would deliver benefits to the public of such significance that additional allocations are required. Opportunity for further growth in the village could be considered as part of the review of the Local Plan.

2.2. Presence of minerals and the impact on deliverability

2.2.1. Norfolk County Council informed the Borough Council at an early stage of development of the SADMP of the general broad areas of underlying minerals within the borough and which of the submitted sites fell within these broad areas. The nature of the geology of the borough meant that minerals underlie vast swathes of the existing settlements and therefore it is very difficult to select sites sequentially away from safeguarded areas for minerals (particularly for the strategic areas of growth around King's Lynn). The Council formulated a general policy approach for each site which is underlain by minerals to require an Environment Statement is produced that ensures the identified mineral resource is investigated, extracted and/or used on site. The policy clause is worded to provide sufficient flexibility where extraction is not a viable option and therefore would not prevent the deliverability of any one site.

2.3. Impact on Landscape and Amenity

2.3.1. Representation by Bennett Plc (William Arkell ID: 786487) argues that the site is not justified on the grounds that the site would have a negative impact on landscape and amenity as it would protrude into the countryside with no screening to the south and will remove views of the wider countryside from Thieves Bridge Road. Development of any one of the submitted options in Watlington will obstruct views of open countryside and the Council would seek new planting to help screen development from the wider countryside for any one of the submitted options for development. The proposed site is surrounded on three sides by existing development and significantly will not protrude further south than existing properties along Downham Road. Whilst it is understandable that residents of Thieves Bridge Road are concerned at the loss of views of open countryside, this is likely to be a concern of the neighbouring properties adjacent to any one of the submitted options for development (except for Land adjacent to Station Road). Most Norfolk villages are bordered by agricultural land with limited brownfield options available and the Council must make difficult decisions regarding the loss of countryside and productive agricultural land in order to deliver the

housing target and meet the requirement. The Council believe that site G.112 provides the opportunity to join existing development to the east and west of Thieves Bridge Road and in this context is not an isolated development which would visibly protrude into open countryside and therefore would not have a negative impact on landscape and amenity.

2.4. Sustainability of the site

2.4.1. Representation by Bennett Plc (William Arkell ID: 786487) disputes the scoring of site 370 Land fronting Mill Road and the proposed allocated site (G.112) in the SA, and considers that the Council have incorrectly identified G.112 as the most sustainable site. In developing the Sustainability Appraisal, the Council score each site according to the evidence available at the time using desk top based assessments, site visits, submitted representations including supporting reports by landowners and developers and through public consultation. The Sustainability Appraisal is designed to aid site selection by providing an objective overview of the performance of any one site against a rigid set of sustainability criteria and therefore enables comparison of a number of options.

2.4.2. It is acknowledged that in villages such as Watlington, there are a number of submitted sites which provide similar opportunities and constraints and that the selection of any one site is not a clear cut choice but accords with the best information that the Council have at the time. The Council has not received any evidence that site G.112 is not justified, sustainable, viable, available or deliverable.

3. Consideration of alternative options

3.1. The Sustainability Appraisal details the assessment of alternative options but the two representations made at pre-submission stage promoting alternative options have also been considered further below.

3.2. Representation by Emery Planning Partnership on behalf of A W Dean (ID: 402843) propose a mixed use development including 50 space station car park, 500 square metres for Class B1 use, 1 dwelling and 8 live/work dwellings with amenity space. They have submitted a planning application reference 15/01306/OM which is currently pending consideration. Watlington is almost wholly within flood zone 1 apart from land west of the railway line which is at risk of flooding (tidal zone 2 and 3) and therefore the Council have adopted the sequential approach to selecting sites in the village to avoid further residential development in areas of flood risk. The Council have not actively sought to allocate employment land or non-residential uses in the

KRSC and Rural Villages (other than the exceptional opportunity at Burnham Market which is in addition to housing) as such applications can already be assessed against policies in the Core Strategy (CS06 Development in Rural Areas, CS10 The Economy, CS13 Community and Culture). The Council will consider the proposal in detail as part of the planning application.

- 3.3. Representation by Bennett Plc (William Arkell ID: 786487) propose site 370 Land fronting Mill Road for 32 dwellings. Circumstances have changed since the site was originally submitted to the Council in that land west of Glebe Avenue has now been developed for housing therefore providing the site with a clearer access route and further integrating the site with surrounding development. Whilst the site has its merits, the proposal does not render the original choice of land south of Thieves Road a less sustainable option. Therefore, the Council consider that site G.112 should continue to be the allocated site for 32 dwellings.

4. Conclusion

- 4.1. The Council considers that it has allocated an appropriate level of residential dwellings in Watlington. A number of issues have been raised regarding the choice of site G.112 for allocation including the presence of minerals, impact on landscape and amenity and the overall sustainability of the site. The Council have considered representations made and conclude that whilst there are a number of potential options for development in Watlington, there is no evidence that site G.112 land south of Thieves Bridge Road is not justified, sustainable, viable, available or deliverable.

Appendix 1

Dear Sir / Madam,

Without prejudice

**King's Lynn & West Norfolk Local Plan
Preferred Option Site WAT1 (Part of Site Ref No: 449)**

The Borough Council published the Preferred Options for the Detailed Policies and Sites Plan on July 29th 2013. In preparation for the final submission version, we are seeking to contact landowners and agents of sites considered as potential options for allocation. We hold your contact details as the landowner or representative for a site. If this is not the case, please contact me directly or return the form provided.

It is important for us to be able to show, at the Plan examination, that the development promoted is 'deliverable' (viable, available and achievable). Therefore we wish to understand, as far as possible, the likely prospects for development of each of the sites under consideration before making final decisions on what allocations to include in the Plan. I am therefore writing to encourage you to submit further information about the site, in order to help us decide whether to include such an allocation in the final 'Proposed Plan'.

The proposed Plan will be submitted for examination, where an independent planning inspector will decide whether it is legally compliant and 'sound' and can therefore be adopted by the Council. Deliverability is one of the key tests the Inspector will be applying to the Plan.

We request that you please return the form by the **deadline 1st April 2014**. Please complete the form, even if you have previously provided this information to us at any stage. The Planning Inspectorate requests that any evidence to support an examination of plan documents is up to date and provided in a clear format. In the case that more detailed information has previously been submitted there is no requirement to repeat this. We would appreciate if you could complete the basic questions and tick box answers and refer to your submission for further details.

[Type text]

Disclaimer

The Council is still assessing all potential options for housing allocation. Completion of this form will be used to consider whether a site is deliverable within the plan period (to year 2026). However, completion of this form does not guarantee that any site will continue to be identified for housing allocation at the submission stage.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alan Gomm', with a horizontal line underneath.

Alan Gomm
LDF Manager

Site Deliverability Form

- Please complete this form to the best of your knowledge and return to the Council by post by **1st April 2014**. If you would prefer to complete these electronically please contact the LDF team on LDF@west-norfolk.gov.uk or 01553 616443 to receive an electronic version.
- If you have previously sent more detailed information to the Council, for example, in response to the preferred options consultation (29/07/13 – 04/10/13) please indicate this on the form.
- Where more detailed information has been submitted previously, there is no requirement to repeat this information. The Council appreciates you taking the time to complete basic questions on the form and indicating that more detail is available elsewhere.
- The form provides the Council with an overview of the deliverability of any site, and will be collated as evidence to support the Detailed Policies and Sites Plan.

Return Address

Please return completed forms to:

Planning Policy Team (Deliverability Form)
Environment and Planning
Borough Council of King's Lynn and West Norfolk
King's Court, Chapel Street
King's Lynn, Norfolk
PE30 1EX

Data Protection and Freedom of Information

The information collected in this response form will be used by the Borough Council to inform the Detailed Policies and Site Plan and subsequent components of the Local Plan.

By responding you are accepting that your response and the information within it will be in the public domain, and that it may be disclosed if requested under the Freedom of Information Act.

Site Reference	WAT 1
Are you the correct person/company to contact about the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If no, please explain why you are no longer the contact person/company for the site and please provide the correct contact details, if known, on the form below</p>

Contact details	
Name	D.W. BALL and M.A. PLANT (TRUSTEES)
Relation to the site	<input checked="" type="checkbox"/> Landowner <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Other, please provide details
Company	% WHEELERS
Address	27-29 OLD MARKET WISBECH Cambs
Postcode	PE13 1NE
Telephone	01945 - 582547
Email	mary.plant@wheelers-accountants.co.uk
Ownership	

Is the land under single ownership?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If 'no' who are the other landowners?	Please list other owners: Mr A. Rockcliffe Mr R. Rockcliffe
Is the access to the site under separate land ownership/s	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please provide details
<p>In the case that the site, or access to the site is owned by more than one landowner, the Council may contact you to establish which part of the site is under your control. If it is possible to indicate this on the attached map, or you have previously detailed this in documentation to the Council, please confirm this by providing details below.</p> <p>N/A</p>	

Availability

<p>Is the site occupied?</p>	<p><input checked="" type="checkbox"/> Occupied <input type="checkbox"/> Part occupied <input type="checkbox"/> Vacant</p> <p>If occupied, please provide details</p> <p><i>Occupied by F. Harold Rockcliffe Ltd. (agricultural tenancy)</i></p>
<p>When is the site available?</p>	<p><input checked="" type="checkbox"/> Available now <input type="checkbox"/> Not immediately available but could be developed within the plan period (before 2026) <input type="checkbox"/> not within the plan period (2027+)</p>
<p>If the site were allocated for development, when would you intend to develop the site?</p>	<p><input checked="" type="checkbox"/> 2014/15-2018/19 <input type="checkbox"/> 2019/20-2032/24 <input type="checkbox"/> 2024/25-2025/26</p> <p>Please provide any comments you may have on how firm the indicated dates are, and what would cause this to change.</p> <p><i>Work is underway to submit a planning application in the next 12 months</i></p>

<p>Constraints</p>	
<p>Are there any financial considerations that you are aware of that may influence whether or when the site would be developed?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide details</p>

<p>Are you aware of any abnormal costs associated with bringing forward this site for development, e.g. contaminated land?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide details</p>
<p>Are there any other constraints that may prevent or delay development of the site? (see examples)</p>	<p>e.g. access issues, land contamination, ecology issues, land covenants, heritage issues, flood risk, legal issues, infrastructure requirements, hazards, land use, occupation of land, market demand, other?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please provide further details or state 'see submission for full details'</p>

Further Information	
If the site was identified by the Council as a preferred option, have you read the draft policy relating to it?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Do you have any comments on the requirements and consideration set out in that draft policy?
Other	
Please provide details of any other viability issues in relation to the site that the Borough Council should be aware of that has not been covered in your submission or this form (use separate sheets if necessary)	
Signature	
Print name	
Date	

Further Information

If the site was identified by the Council as a preferred option, have you read the draft policy relating to it? **Yes**

Other

Please provide details of any other viability issues in relation to the site that the Borough Council should be aware of that has not been covered in your submission on this form (use separate sheets if necessary)

There are no viability issues which would prevent the deliverability of this site within the early part of the period 2014-2019 – see previous section about intention for site development.

Signature **M. A. Plant**

Print name **M. A. PLANT**

Date **26 MARCH 2014.**

