



**Follow up work in relation to the Examination
into the King's Lynn and West Norfolk Local
Plan: Site Allocations and Development
Management Policies**

The Approach to Brownfield Sites

November 2015

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1. Introduction

- 1.1 This paper explains the BCKLWN's approach to Brownfield sites in relation to residential housing allocations within the SADMP.
- 1.2 It first describes the approach taken, leads onto the site selection and the appropriate weight applied to previously developed land within the assessments. A tabular commentary of the allocated sites on such land is given and a schedule of all the residential site allocations within the SADMP Pre-Submission Version (January 2015) is provided.

2. The Approach Taken

- 2.1 At an early stage the decision was taken in assessing sites that significant weight would be applied to the retention of employment land for employment purposes, i.e. land that was currently being used or had a realistic prospect of being able to be used for employment purposes. As outlined later in the paper, weight is given to the suitable redevelopment of Brownfield sites, which are not in productive uses. This is outlined in the CS Objectives, in particular:

'Economy

2. West Norfolk has a thriving economy with local employment opportunities.

King's Lynn

17. There has been an emphasis on brownfield redevelopment and renewal within the town, together with urban extension.

Rural Areas

29. Elsewhere the local economy has been bolstered by guiding new development (including market housing) to the most sustainable locations, recognising the needs for the agricultural sector and the potential diversification into other activities, and retaining where possible, current employment sites.'

2.2 These objectives informed CS Policy CS10 The Economy, in particular 'Retention of Employment Land' which states:

'The Council will seek to retain land or premises currently or last used for employment purposes (including agricultural uses)...

2.3 This approach has caused slight confusion in that promoters of sites, with employment uses, proposed as growth options for settlements believed that they may be able to overcome the approach by using the criteria set out in CS 10 The Economy. This would apply to a planning permission; however this is not the case for allocation purposes, where the Borough Council is positively seeking the *most* appropriate sites for allocation.

2.4 Brownfield sites within settlement boundaries, with the exception of King's Lynn (including West Lynn), were not considered for allocation. This was because those sites could potentially come forward for housing without allocation, with regard to CS10 (subject to certain criteria), and their Brownfield status would be a material consideration. The following paragraph from the Settlement & Sites – Allocations and Policies chapter of the SADMP (page 72) states:

'D.1.8 It is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permission, and others will come forward on unallocated sites within development boundaries....'

2.5 The approach taken is considered to be appropriate to support the sustainability of settlements ensuring that sufficient economic land is available across the Borough to sustain and support growth over the Plan period. This is considered to be consistent with NPPF paragraph 7, first bullet point:

'7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise

to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

.....'

2.6 It is considered consistent with NPPF paragraph 17, eighth bullet point, paragraph 19 and 111, in that a target not to lose employment land has been set and, as described later in this paper, weight has been given to previously developed land, which is not employment land, with a number of residential housing allocations utilising such Brownfield sites.

'Core planning principles

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;'

'Delivering sustainable development

1. Building a strong, competitive economy

.....

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an

impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.'

'111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.'

- 2.7 Thus we see on the one hand a wish to re-use previously developed land, but on the other the provision of support for economic growth. There may well be previously developed sites that are suitable, but not every site is automatically appropriate.
- 2.8 Whilst this approach is considered appropriate for the current SADMP, this approach will be reviewed and a different strategy could potentially be taken forward as part of the plan review process. This is highlighted by NPPF paragraph 22.

3. Site Selection Process

- 3.1 As part of the site selection process the sites submitted for consideration to be residential housing allocations were subject to an assessment process. This took the form of a site technical assessment, and if not rejected at this stage, the site progressed to the Sustainability Appraisal. (This process is described in the SA, SA01)
- 3.2 Within the technical assessment, the second stage assessed the sites in terms of a range of constraints; the evolution of these constraints is contained within statement CD33 in relation to the Local Plan Sustainability Objectives. In total there are ten constraints and three of

these are of particular relevance to this paper, as detailed below, (note the full table is contained within the technical assessment).

| Site Technical Assessment Criteria Stage 2 – Constraints | | Scoring system | | |
|---|--|----------------|-----------------------|-------------|
| | | Unconstrained | Partially constrained | Constrained |
| Brownfield / Greenfield | Is the site greenfield (undeveloped) land? | 4 | 2 (part of site) | 0 |
| Loss of Employment Land | Would housing development on the site result in loss of land for employment uses? | 4 | 2 (part of site) | 0 |
| Loss of Agricultural Land | Would development of the site result in loss of high quality agricultural land (Grade 1 – 3) currently in agricultural use or capable of being returned to that use? | 4 | 2 (part of site) | 0 |

3.3 This demonstrates that Brownfield sites have been given appropriate weight, with a higher score (4) being recorded for a Brownfield site than a Greenfield one (0). The loss of Grade 1 – 3 agricultural land being awarded a low score (0). It also shows that there is a distinction between sites that would lead to the loss of employment land if allocated, with a higher score awarded to those sites that would not result in the loss of employment land (4). This process provided the opportunity to assess the site constraints and the combined effects of the constraints on each site, giving appropriate weight to each of ten constraints, including the three in the table provided.

3.4 The full Sustainability Appraisal then assessed the sites against ten Site Sustainability Factors (the evolution of these is described in paper

CD33 & SA01). These were used to inform the choices between sites and assess the combined anticipated effects of the selected sites; the results are available within the SA (SA01). The Site Sustainability factors and the Site Sustainability scoring guide are provided within SA01. Of particular relevance are:

| | SITE SUSTAINABILITY FACTOR | Includes positive and negative anticipated results in terms of, for example: |
|---|-----------------------------------|---|
| c | Economy A: Business | Promotes economic development; creates supports employment. |
| d | Economy B: Food Production | Use of higher or lower grade agricultural land; development that involves/supports food production. |

The scoring guide:

| Sustainability Impact Score | Economy A Business | Economy B Food Production |
|--------------------------------------|--|---|
| ++ highly positive | Highly positive permanent contribution to the economy – jobs, business opportunities | |
| + positive | Overall positive contribution to the economy – jobs, business opportunities | Grade 6 Urban/Previously developed land |
| O neutral | Allocation would deliver minimal/no real benefit to the economy | Grade 4 + 5 |
| +/ positive/ negative | N/A | Part of site grade 4/5 and part of site grade 3 agricultural land |

| Sustainability Impact Score | Economy A Business | Economy B Food Production |
|--|---|-------------------------------------|
| ? unknown | Unknown impact | Unknown impact (unknown grade/type) |
| # dependant on implementation | Scheme details still negotiable (may deliver some employment/mixed uses) | N/A |
| X negative | Overall negative impact on the economy – minor loss of jobs and business opportunities | Grade 3 agricultural land |
| xx highly negative | Highly negative permanent impact on the economy – major loss of jobs and business opportunities | Grade 1 + 2 Agricultural Land |

3.5 This demonstrates that appropriate weight has been given to Brownfield sites as a positive score is recorded for urban and previously developed land. Likewise negative scores are recorded if a site's allocation would result in the loss of employment land.

4. Allocated Sites for Residential Housing Proposed by the SADMP

4.1 The most sustainable and therefore least constrained sites on balance are proposed for residential housing allocations within the SADMP. Urban extensions by their very nature often tend to take place on Greenfield sites, as they are extending the urban environment. A large proportion of the sites put forward for consideration in rural West Norfolk were Greenfield sites and whilst all sites were assessed in the process outlined in this paper and elsewhere, this has led to a smaller

number of Brownfield Sites being allocated in comparison to Greenfield Sites.

4.2 Set out in the table below is a schedule of the Brownfield sites that have been allocated for residential purposes within the SADMP, (note a full schedule is provided as Appendix 1), this details approximately 750 dwellings units out of a total of 6,489 being allocated on Brownfield. This equates to 11.5%:

| Settlement | Site Ref | Dwelling Allocation | Gross Site Area (Ha) | Brownfield or Greenfield | Site Description |
|-----------------------|----------|---------------------|----------------------|--------------------------|---|
| King's Lynn | E1.5 | 350 | 4.1 | B & G | An area of derelict land at Boal Quay, formerly industrial (brewery) currently used for car parking. The site also contains the former loop of the River Nar. |
| | E1.8 | 50 | 0.5 | B | The site at South Quay consists of the former Grain Silos and vacant Sommerfeld and Thomas Warehouse. |
| | E1.10 | 50 | 3.8 | B & G | The land north of Wisbech Road consists of a mixture of industrial/former industrial uses together with scrubland |
| | E1.11 | 20 | 0.2 | B | Former car parking area |
| West Lynn | E1.15 | 200 | 2.6 | B | Former Del Monte industrial site at Bankside. A derelict cleared Brownfield site |
| Castle Acre | G22.1 | 15 | 1.1 | B & G | Part of the site contains an area hosting some dilapidated residential cottages |
| Methwold | G59.4 | 5 | 0.5 | B | Former Coal yard |
| Stoke Ferry | G88.3 | 12 | 0.5 | B | Former site of a petrol station, now cleared |
| Ten Mile Bank | G92.1 | 5 | 0.23 | B & G | Part of the site contains some derelict farm buildings and a vacant bungalow |
| Terrington St Clement | G93.3 | 35 | 2.2 | B | The site comprises derelict greenhouses |
| Welney | G113.1 | 7 | 0.25 | B | The site had previously been developed and hosts the Village Hall |

5. Consideration of 'brownfield' sites in the Wisbech Fringe Area

- 5.1 The inspector has asked for an explanation of the way in which brownfield sites were considered in and around the east Wisbech area.
- 5.2 There was a range of sites put forward for consideration in the Local Plan process. The reasonable alternatives are detailed and assessed in the Sustainability Appraisal. The Sustainability Appraisal illustrated that the site assessment for the reasonable alternatives in this location was extremely close. The consideration of sites in the Wisbech fringe takes into account many other factors including availability, access, landscape, relationship to settlement and/ or other allocations as well as the current use of land on the site. From the SA the only reasonable alternative brownfield site was part of the wider area of land owned by COWA.
- 5.3 Issue Statement REP 11-02 written on behalf of COWA, made the case that there is an equally suitable site for allocation in comparison to E3.1. Reference is made to the fact that part of the site is brownfield. This includes some existing buildings which were part of the former agricultural college. The brownfield element amounts to only a small part of a much wider site, approx. 1ha.
- 5.4 In determining the preferred allocation it is the role of the Council to balance all the considerations, including whether the land was previously developed. Notwithstanding the importance of re-using brownfield sites it was considered that the relationship between our proposed allocation and the allocation in the adopted FDC Local Plan was a significant factor which influenced the decision making. The Statements for Issue 11: Wisbech, and the Statements of Common Ground (CD14) reflect this joint-allocation approach.

6. Development on Brownfield Sites

- 6.1 It is proposed to include a section within the SADMP, addressing development on brownfield sites and detailing the mechanism for employment land coming forward for residential use, via Core Strategy Policy CS10 The Economy. This would sit within Chapter D Settlements & Sites – Allocations and Policies, and follow on from paragraph D.1.17 on page 74. This would appear as below:

Development on Brownfield Sites

It is important to make best use of available sites across the Borough. This Plan needs to allocate land for a variety of uses; residential; employment; retail; open spaces etc. However, there is a need to balance the development of greenfield sites with previously developed land. (See Appendix 1 Glossary for definition of Brownfield Land or Sites). In addition brownfield sites not necessarily in current productive use may still have the right to be used for employment. Policy CS10 The Economy of the adopted Core Strategy seeks to allow the potential change away from employment to residential on an individual site-by-site basis, subject to certain criteria being met:

- Continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
- Use of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- An alternative use or mix uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

Whilst the Borough Council supports the use of brownfield sites for residential uses the Core Strategy objectives do seek to retain a resource of employment sites across the Borough. Allocations are made within the plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy CS10 referred to above will provide an opportunity to bring additional housing sites forward.

The following sections of this Plan positively allocate land for housing, but adventitious sites will continue to come forward, positively from employment sites being reused.

6.2 As referenced in the proposed SADMP text above, for ease and clarification, it is suggested that the SADMP glossary definition for Brownfield Land or Sites matches the NPPF definition of brownfield / previously developed land. Currently the glossary simply states 'Previously developed land', below is the proposed version:

| | |
|--------------------------|--|
| Brownfield Land or Sites | <p>Previously developed land. Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:</p> <ul style="list-style-type: none"> • land that is or has been occupied by agricultural or forestry buildings; • land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; • land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and • land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time. |
|--------------------------|--|

7. Brownfield Land Register

- 7.1 The Government are seeking to implement a statutory register of brownfield sites. Brownfield sites identified on the register, subject to approval of a limited number of technical details, will be granted automatic planning permission in principle. In order for a site to be placed upon the register the site has to comply with the NPPF definition of previously developed land, be deliverable, free of constraint (that cannot be mitigated), capable of development, and capable of supporting 5 or more dwellings on sites of 0.25ha and above. The register will be kept under review and will be made available to the public.
- 7.2 Further details on how the Brownfield Land Register will be implemented are awaited from the Government. Accordingly the review of the SADMP Plan will be the appropriate place that this can be fully incorporated.

8. Conclusion

- This paper has outlined the approach taken within the SADMP in relation to Brownfield sites and weight given.
- The approach is considered to be consistent with the NPPF.
- A number of Brownfield Sites have been allocated for residential purposes, ensuring where consistent with established objectives the re-use of previously developed land.
- In the area east of Wisbech the re-use of brownfield land was one of many factors considered in choosing the allocation, however it was not the determining issue in this case.
- Outlined proposed changes to the SADMP to encompass a brownfield section, that highlights the mechanism for employment sites coming

forward for residential purposes, and enhanced glossary definition of brownfield.

- As highlighted the approach could be reviewed as part of the scheduled SADMP Plan Review, and will encompass the Statutory Brownfield Register once implemented.

Appendix 1 Schedule of Residential Sites Allocated in the SADMP Pre-Submission Version (Jan 2015)

| Settlement | Site Ref | Dwelling Allocation | Gross Site Area (Ha) | Brownfield or Greenfield |
|---------------------------------------|-------------|---------------------|----------------------|--------------------------|
| King's Lynn | E1.4 | 170 | 5.3 | G |
| | E1.5 | 350 | 4.1 | B & G |
| | E1.6 | 260 | 8.8 | G |
| | E1.7 | 450 | 13.7 | G |
| | E1.8 | 50 | 0.5 | B |
| | E1.9 | 100 | 3.3 | G |
| | E1.10 | 50 | 3.8 | B & G |
| | E1.11 | 20 | 0.2 | B |
| West Lynn | E1.14 | 49 | 2 | G |
| | E1.15 | 200 | 2.6 | B |
| West Winch | Growth Area | 1,600 | 171 | G |
| South Wootton | E3.1 | 300 | 40 | G |
| Knights Hill | E4.1 | 600 | 36.9 | G |
| Downham Market | F1.3 | 250 | 16.2 | G |
| | F1.4 | 140 | 13.9 | G |
| Hunstanton | F2.2 | 120 | 6.2 | G |
| | F2.3 | 50 | 5 | G |
| | F2.4 | 163 | 12.6 | G |
| Wisbech Fringe | F3.1 | 550 | 25.3 | G |
| Brancaster | G13.1 | 5 | 0.5 | G |
| Burnham Deepdale (Brancaster Staithe) | G13.2 | 10 | 0.7 | G |
| Burnham Market | G17.1 | 32 | 2.7 | G |
| Castle Acre | G22.1 | 15 | 1.1 | B & G |
| Clenchwarton | G25.1 | 10 | 0.7 | G |
| | G25.2 | 20 | 1.07 | G |
| | G25.3 | 20 | 1.2 | G |
| Dersingham | G29.1 | 20 | 1.8 | G |

| Settlement | Site Ref | Dwelling Allocation | Gross Site Area (Ha) | Brownfield or Greenfield |
|---------------------|----------|---------------------|----------------------|--------------------------|
| | G29.2 | 10 | 0.3 | G |
| Docking | G30.1 | 20 | 3.4 | G |
| East Rudham | G31.1 | 10 | 0.4 | G |
| East Winch | G33.1 | 10 | 0.8 | G |
| Emneth | G34.1 | 36 | 1.1 | G |
| Feltwell | G35.1 | 15 | 0.7 | G |
| | G35.2 | 40 | 3.6 | G |
| | G35.3 | 10 | 0.3 | G |
| Hockwold | G35.4 | 5 | 0.2 | G |
| Fincham | G36.1 | 5 | 0.5 | G |
| Gayton | G41.1 | 23 | 2.8 | G |
| Grimston & Pott Row | G41.2 | 23 | 1.3 | G |
| Great Bircham | G42.1 | 10 | 0.58 | G |
| Great Massingham | G43.1 | 12 | 0.6 | G |
| Harpley | G45.1 | 5 | 0.35 | G |
| Heacham | G47.1 | 60 | 6 | G |
| | G47.2 | 6 | 1.3 | G |
| Hilgay | G48.1 | 12 | 0.6 | G |
| Hillington | G49.1 | 5 | 0.3 | G |
| Ingoldisthorpe | G52.1 | 10 | 0.7 | G |
| Marham | G56.1 | 50 | 3.6 | G |
| Marshland St James | G57.1 | 15 | 0.8 | G |
| | G57.2 | 10 | 0.75 | G |
| Methwold | G59.1 | 5 | 0.25 | G |
| | G59.2 | 25 | 1.1 | G |
| | G59.3 | 10 | 0.6 | G |
| | G59.4 | 5 | 0.5 | B |

| Settlement | Site Ref | Dwelling Allocation | Gross Site Area (Ha) | Brownfield or Greenfield |
|---|----------|---------------------|----------------------|--------------------------|
| Middleton | G60.1 | 15 | 0.8 | G |
| Runcton Holme | G72.1 | 10 | 0.9 | G |
| Sedgeford | G78.1 | 10 | 0.6 | G |
| Shouldham | G81.1 | 5 | 0.3 | G |
| | G81.2 | 5 | 0.3 | G |
| Snettisham | G83.1 | 34 | 1.5 | G |
| Southery | G85.1 | 15 | 1.2 | G |
| Stoke Ferry | G88.1 | 5 | 0.4 | G |
| | G88.2 | 10 | 0.7 | G |
| | G88.3 | 12 | 0.5 | B |
| Syderstone | G91.1 | 5 | 0.3 | G |
| Ten Mile Bank | G92.1 | 5 | 0.23 | B & G |
| Terrington St Clement | G93.1 | 10 | 0.5 | G |
| | G93.2 | 17 | 0.7 | G |
| | G93.3 | 35 | 2.2 | B |
| Terrington St. John, St. John's Highway & Tilney St. Lawrence | G94.1 | 35 | 2.8 | G |
| Three Holes | G96.1 | 5 | 0.3 | G |
| Tilney All Saints | G97.1 | 5 | 0.25 | G |
| Upwell | G104.1 | 15 | 0.5 | G |
| | G104.2 | 5 | 0.3 | G |
| | G104.3 | 5 | 0.3 | G |
| | G104.4 | 15 | 2 | G |
| Outwell | G104.5 | 5 | 0.3 | G |
| | G104.6 | 35 | 2 | G |
| Walpole Highway | G106.1 | 10 | 0.8 | G |

| Settlement | Site Ref | Dwelling Allocation | Gross Site Area (Ha) | Brownfield or Greenfield |
|--|----------|---------------------|----------------------|--------------------------|
| Walpole St. Peter / Walpole St. Andrew / Walpole Marsh | G109.1 | 10 | 0.85 | G |
| | G109.2 | 10 | 1.44 | G |
| | | | | |
| Watlington | G112.1 | 32 | 1.8 | G |
| | | | | |
| Welney | G113.1 | 7 | 0.25 | B |
| | G113.2 | 13 | 1.25 | G |
| | | | | |
| Wereham | G114.1 | 8 | 1.5 | G |
| | | | | |
| Walton Highway/West Walton | G120.1 | 10 | 0.83 | G |
| | G120.2 | 10 | 0.54 | G |
| | | | | |
| Wiggenhall St. Mary Magdalen | G124.1 | 10 | 0.5 | G |