



Representations to the Examination of the King's Lynn and West Norfolk Local Plan: Site Allocations and Development Management Policies

Wereham Update – Ref FW28

Introduction

1. This representation is made on behalf of Bennett Plc in respect of the land previously allocated for residential development in Wereham under site reference 499 and the previous Reasonable Alternative Site 106/362/813.
2. The representation responds to points made in the Wereham Update Ref FW28.

Response Point 2.2

3. We concur with the Council's conclusion regarding the unsuitability of Site 499 due to ground water issues.
4. Site 499 is named the 'springs' and locally known to suffer from ground water retention, as specified in many of the representations to the plan and the letter from Stoke Ferry Internal Drainage Board dated 24 September 2013 which stated the Board's concerns that additional development would exceed the capacity of the receiving watercourse and would cause issues downstream. Taking paragraph 121 of the NPPF into account, it is not justifiable or sound to build on a site where the ground is not suitable and where alternative land exists. Furthermore, local knowledge of the real possibility of ground water flooding may make selling and marketing any housing on the development difficult, therefore reducing the land's viability and suitability to help meet KLWN's housing targets.

Response Point 2.3 and 2.4

5. We fully support the Council's change in the site allocation at Wereham from Site 499 – Land at the Springs, Flegg Green to the Reasonable Alternative Site 106/362/813.
6. The Council now consider that the previously allocated site 499 is now deemed to be undeliverable without improvements to access which would need to be made to the un-adopted private road which serves the existing housing development at the Springs. Where deliverability is uncertain then Site 499 can no longer continue to be the Council's preferred site. In contrast, Bennett can confirm that Site 106/362/813 has no access issues as it is accessed directly from Flegg Green. The Highways Authority have raised no objections to the site subject to the deliverability of safe site access.
7. Site 106/362/813 should be allocated because of the following reasons:
 - a. It is brownfield and therefore accords with the core principles of the NPPF outlined in paragraph 17



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- b. Access to the site is pre-existing and would not affect other residential properties as it exclusively serves the site;
 - c. As indicated in the sustainability appraisal, it does not suffer from the groundwater flooding potential and therefore does not pose flood risks to any potential new residents and dwellings;
 - d. Development of the site would not result in a loss of the natural environment;
 - e. Allocation of the site for residential development is supported by many local residents;
 - f. The site is brownfield so will not involve the loss of valuable agricultural land used for food production;
8. Although Site 106/362/813 is a brownfield site and was previously used for employment purposes, development of the site as residential accommodation would not be contrary to CS 10, as discussed in full in the previous representation dated February 2015, because there has been no interest in the site from potential employment uses and it remains vacant. It is not positive planning to protect former employment uses when it can be demonstrated that they are no longer viable – this is also contained within CS 10. Redeveloping this site to provide residential homes would therefore be policy compliant and be the most sustainable choice for development within Wereham.
9. We confirm that there are no other development constraints or impediments of which we or Bennett plc are aware. We conclude that Site 106/362/813 is immediately available for development and should receive an allocation for residential development.