



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

ISSUE 42: Wereham (G.114)

Introduction

1. This representation is made on behalf of Bennett Plc in respect of the land allocated for residential development in Wereham under site allocation reference G.114.1.
2. The representation will answer the question posted by the Inspector in regard to issue 42 of the King's Lynn and West Norfolk Local Plan: Site Allocations and Development Management Policies Issues and Options paper.
3. This representation will follow the format as recommended in the Inspector's guidance note, discussing each point of the relevant part of the Plan, G114, in turn with regard to soundness. As asked in issue 42 it then evidences where an alternative option exists.

Point G114.1

4. The land proposed is grade 3 agricultural green field land, located beyond the settlement boundary. Some development beyond settlement boundaries might be necessary, as per DM2, but to release greenfield land when brownfield land is also available in the same area of Wereham means that the plan is not positively prepared and is not consistent with paragraph 111 of the NPPF. As per the Inspector's guidance, a viable alternative would be to develop the brownfield site, also beyond Wereham's settlement boundary located at Hollies Farm, Flegg Green considered by KLWN Council under the reference 813
5. The allocated site is named the 'springs' and locally known to suffer from ground water retention, as specified in many of the representations to the plan. 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. Further, 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.

Point G114.3

6. This point describes Wereham's character but fails to give any justification of why the allocated site is the ideal location for housing development based on the description of Wereham.

Point G114.4

7. It is viable and justified to promote housing in Wereham as West Norfolk has a need for housing – the 2014 SHMA update states that 690 homes are required per year. However the SHMA update also states that the impact on the environment and infrastructure should be



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considered when determining housing development. Developing housing in Wereham is justified, viable and consistent with national policy but not on the proposed site due to the unsound greenfield and flooding issues listed above and access issues discussed below.

Point G114.6

8. This point states that development on this site would not be visually intrusive. The plan has not been positively prepared because the loss of greenfield site, when other appropriate brownfield sites are available in the town, would cause a loss of the character described in point G.114.3.

Point G114.7

9. Access to the proposed site is via an existing narrow cul-de-sac and therefore the infrastructure requirements are significantly lacking. This road appears to be private and gated and if access cannot be secured, or does not have sufficient capacity to accommodate the new development, work will be required to provide an additional access road to the site.
10. The Sustainability Appraisal states the highways authority has no objection to the proposed access through the cul-de-sac provided it demonstrates that it is safe. However, the proposal will more than double the existing houses accessed via this narrow lane and arguably would not be safe and suitable without significant works. Suitable access is discussed in paragraph 32 of the NPPF as a requirement of sustainable growth. Therefore it is not justified or sustainable to have housing on this location as access is not available. The alternatives, with appropriate access available and therefore more deliverable.

Alternatives and Satisfactory Consideration by the Council

11. An alternative site is the brownfield site on the southern side of Flegg Green, directly opposite the proposed site. This site has previously been considered by KLWN Council under the reference 813.
12. It is considered that this is more appropriate than the allocated site because of the following reasons:
 - a. It is brownfield and therefore accords with the core principles of the NPPF outlined in paragraph 17
 - b. Access to the site is pre-existing and would not affect other residential properties as exclusively serves the site;



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- 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. Would not result in a loss of the natural environment
13. This site was not satisfactorily considered by the Council. In the Sustainability Appraisal the Council considered that this site, although being supported by many residents for residential development over the proposed site, would constitute a loss of employment land.
14. However development here 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 be policy compliant, rather than contradicting it as was argued by the Council in the Sustainability Appraisal.