

King's Lynn & West Norfolk B.C.

Examination of Site Allocations & Development Management Policies

ISSUE 4

HEARING : 8 July pm

Policy E1.14 ; Objection 212/213

King's Lynn with West Lynn site allocations

1. Objection 213 relates to the Plan description of a particular site and the uncertainties inherent in that choice, and this makes it doubtful as a "sound" or "effective" allocation. The Objection suggests that specifically in King's Lynn the LPA ought to have an understood list of "understudy" sites that would be relevant if an allocated site failed to come forward as forecast or with the housing density forecast. Some of these may be anticipated windfall sites, others may be various shades of slightly brownfield, but the Plan contains no suggestion for a review arising from monitoring and which could allow a favourable reaction (to sites which have been excluded in this Plan period) when a larger favoured and Allocated site fails to meet the Plan expectations.
2. The Allocations and Development boundary map published for West Lynn has used a large scale, and this results in the accessibility of the locality into King's Lynn town centre being unseen. Immediately south of this plan extract are two further employment and services areas off Wisbech Road and Clenchwarton Road (down to the A47 junction). Furthermore, most of West Lynn is closer to King's Lynn town centre than any of north Gaywood (Wootton Road / Reffley), or Fairstead estates, or either of the two large new Allocations at South Wootton E3 and Knights' Hill E4.
3. West Lynn allocation E1.15 has no descriptive or justifying commentary, but is presumably included as a redevelopment (brownfield) site where no planning permission has yet been commenced. There is a similar site at the riverside east of St Peter's church, excluded because it is within the settlement boundary.
4. From my reading, Policy E1.14 for land west of St.Peter's Road West Lynn is unusually vague about whether, or how much, of the development proposal is capable of actually happening. Since the earliest SHLAA assessments, there is now no way that the ownership can be identified, but this landowner is getting a 'free ride' compared with the hoops others have been put through. In the 2011 consultation, all sites put forward in West Lynn were excluded due to flood risk, but by 2013 they had been assessed with a stronger emphasis on community sustainability, and yet this land is stated to have no Flood Risk Appraisal. It is also alongside the West Lynn creek, partly within Environment Agency bylaws and entirely within Natural England statutory consultation zones, but it apparently has no ecological appraisal. From the policy briefing (or conditions) the area allocated even seems to still include active playing fields in school grounds.

5. In the 2013 Preferred Options consultation, the triangular site 447 at Clenchwarton Road appears to be the third choice site for West Lynn. Since the 2011 Issues & Options consultation, the Plan had changed from referring to West Lynn as if it were a separate village, because in fact it is administratively and physically part of King's Lynn town and the contiguous built-up area. The commentary referred to distance of site 447 from the village services. This site has a south-eastern boundary along the medieval sea bank and has never been subject to flooding. The bank acts as a secondary defence with crest heights of between 5.10 and 5.84m AOD, and the frontage to Clenchwarton Road along the west side is at 5.23m AOD. There is a public footpath connection along the bank due north onto St Peter's Road and into the centre of West Lynn, or buses on the road frontage into the town centre. The site is disadvantaged in assessments which use Lidar data from satellites (such as that from the Environment Agency) because some of the site has been excavated, and this shows up as being below crucial future flood levels; however the SHLAA schedules have been in error in suggesting tidal hazards, or Grade 1 agricultural land! If the site was filled with appropriate materials to congruent levels (being above 4.3m AOD) it would be within Flood Zone 2, with a 1 in 200 years risk of return events. This is the same standard obtained on sites such as E1.14 west of St Peter's Road, and is the common standard for residential development west of the Great Ouse, where mitigation measures are achieved by allowing a 300mm freeboard between roads and internal floor levels.

6. The purpose of this objection is to understand why a site such as E1.14 came to be allocated on such a weak technical assessment, and to put forward the next choice of site in West Lynn as a fall-back for any loss of development momentum on any site in the King's Lynn built-up area.

The Inspector is asked to consider recommending that the LPA should create a list of 'next choice' review sites in the event that any allocated sites in King's Lynn town do not commence within a reasonable time period, for example in the next 4 years, or do not achieve the density assumed in the target figure associated with the allocation.