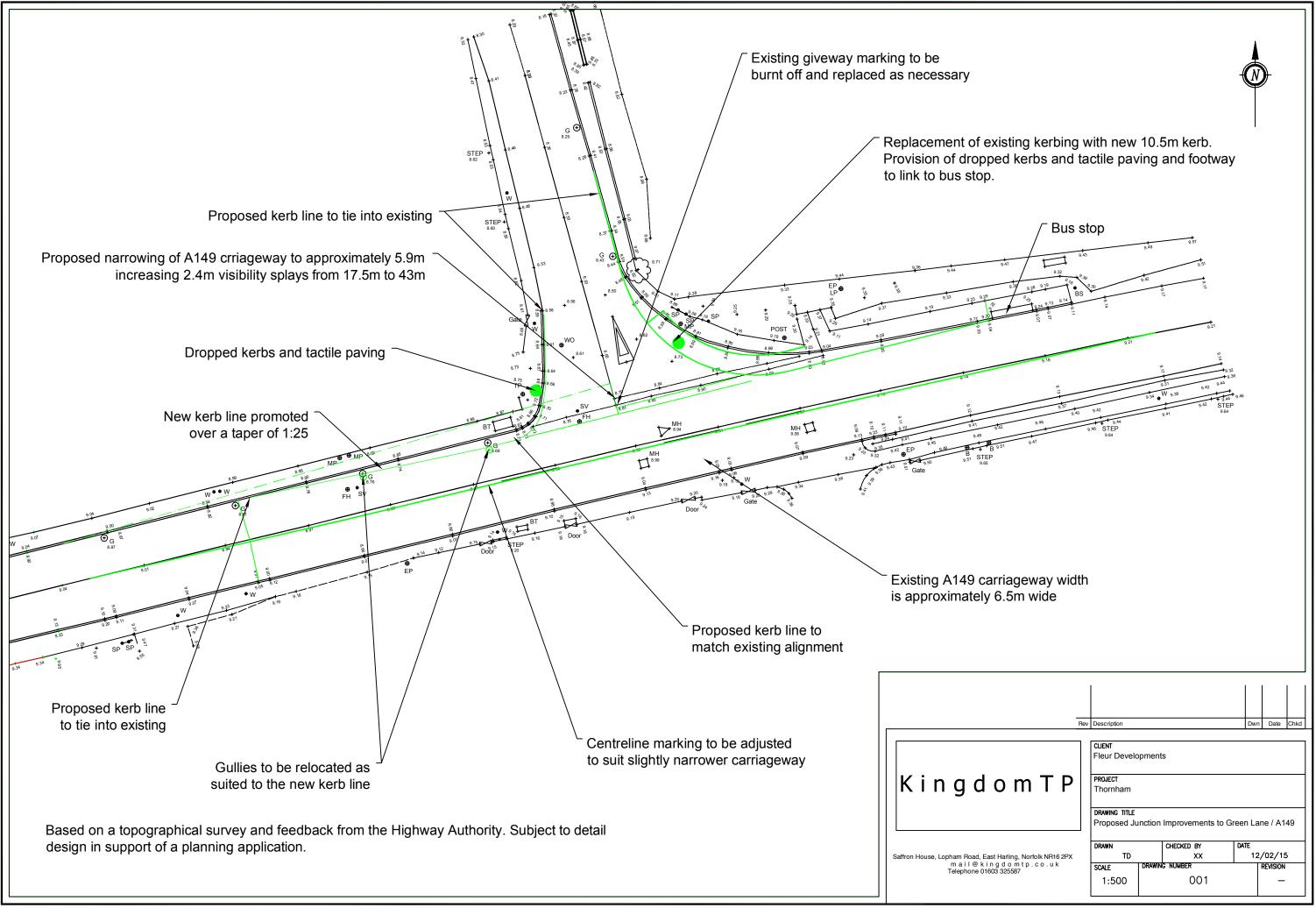
Appendix C A149 / The Green Proposed Junction Improvements



Issue 46: Thornham

Ian Reilly (906) – Fleur Developments



Appendix 2 –Norfolk Coast Partnership Representation at Issues and Options

ldf@West-Norfolk.gov.uk

From: Venes, Tim [tim.venes@norfolk.gov.uk]

Sent: 17 November 2011 09:57

To: Idf@West-Norfolk.gov.uk

Subject: LDF consultation response

Attachments: BCKLWN LDF SSA Options and Issues NCP response.doc

Dear Sir

Local Development Framework - Site Specific Allocations and Policies DPD, Issues and Options Consultation

Please find attached a response to consultation on the above.

Yours faithfully,

Tim Venes

Norfolk Coast Partnership Manager

Norfolk Coast Partnership

The Old Courthouse Baron's Close, Fakenham Norfolk NR21 8BE

Telephone: 01328 850530
E. tim.venes@norfolk.gov.uk
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Protecting an Area of Outstanding Natural Beauty

Funded by Defra, Norfolk County Council, North Norfolk District Council, Borough Council of King's Lynn & West Norfolk and Great Yarmouth Borough Council

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Borough Council of King's Lynn and West Norfolk, King's Court, Chapel Street, KING'S LYNN PE30 1EX (01553) 616200.

Development & Regeneration Services. The LDF Team, Borough Council of King's Lynn & West Norfolk, King's Court, Chapel Street, Kings Lynn, Norfolk, PE30 1EX.



Norfolk Coast Partnership

The Old Courthouse Baron's Close **FAKENHAM** Norfolk NR21 8BE Tel: 01328 850530 Fax: 01328 850546

email: aonb@norfolk.gov.uk www.norfolkcoastaonb.org.uk

18 November 2011

Dear Sir

BCKLWN Local Development Framework Site Specific Allocations Options and Issues Consultation Autumn 2011

Thank you for the opportunity to comment on this aspect of the development of the Local Development Framework. My comments relate to consideration of potential effects on the Norfolk Coast Area of Outstanding Natural Beauty.

General comments

Due regard for AONB designation

Although both the AONB (and Conservation Areas) are generally mentioned in the text of the SHLAA table and the SSA document, it is not always clear that the AONB has been given sufficient weight in the assessment process (SHLAA), and there appears to be some inconsistency regarding whether the AONB designation is considered under stage 1 or stage 2 assessments. In general, it appears to be included within 'environmental designations' in stage 2 suitability assessment, with LNR, CWS, RNR (although AONB is not mentioned in the table on p27 of the SHLAA) but as a statutory national landscape designation, with equal protection to national parks, it clearly carries more weight than these local designations.

The AONB designation is recognised in constraints in SHLAA table for sites within it, and this is carried through to text in the SSA document, although this is not consistently the case for those settlements close to the AONB, which potentially affect the setting of this national landscape designation.

In future rounds of consultation on the Site Specific Allocations, it would be helpful to include the AONB and Conservation Area boundaries on settlement maps, including for settlements close to the AONB although not within it. This would help in assessing and responding on the context of proposed sites in respect of these two important designations at the next stage of consultation, and demonstrate that due regard was being given to these.

Major development in the AONB

In general, the planning system has been applied effectively in West Norfolk since the designation of the Norfolk Coast AONB in 1968 as a key tool for implementing the purpose of designation of AONBs i.e. the conservation and enhancement of natural beauty.



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With only minor exceptions, this purpose has been given appropriate weight in managing development in settlements within the AONB, and the AONB boundary has been respected as far as expansion of settlements in close proximity to it are concerned.

Now, given changing or inconsistent signals from Government and plans for a significant increase in development in the Borough, this situation may be under threat and a national heritage asset degraded.

The SHLAA recognises that major development is not appropriate in the AONB when considering proposals put forward, and this is carried through to the SSA document. However, neither PPS7 nor the draft National Planning Policy Framework defines 'major development' in this context. There is a likelihood that the meaning of 'major development' may differ between the planning authority and developers, which could lead to problems.

The most widely accepted and used definition of 'major development' in planning is that in the Town and Country Planning Order 1995 i.e. 10 or more dwellings / 0.5 ha or more, or 1000 or more square metres floor space for non-residential development. I suggest that the Borough Council could specify this as their understanding, or otherwise define the meaning of the term in this context.

However, there is a further danger that the wrong signals may be given in some cases by the SHLAA and the SSA, in that although development that is not 'major development' may be acceptable in the AONB, for settlements that lie outside the AONB any expansion across the boundary into the AONB is likely to be unacceptable, except in very exceptional circumstances. If such development is allowed, experience elsewhere in the AONB indicates that this would lead to loss of meaning of the boundary and a devaluation of the AONB designation, with continued pressure for piecemeal 'minor' development, further compounding this effect.

PPS7, para 21 states that planning policies:

"...should also support suitably located and designed development necessary to facilitate the economic and social well-being of these designated areas and their communities, including the provision of adequate housing to meet identified local needs."

While it is therefore clear that appropriately sited and designed 'minor' development in the interests of communities within the AONB is acceptable and indeed desirable, this is not intended to include settlements outside the AONB expanding across the AONB boundary.

Development in any settlements should be based on need, and PPS7 makes clear this is especially so for AONB settlements. Development proposals must demonstrate how they would bring benefits to the AONB community (e.g. providing affordable housing) and meet the highest standards of design, in terms of building style, consistency with settlement character and assimilation into the wider landscape.

<u>Distribution of growth between settlements</u>

My preference for the question posed in section 2 of the SSP document on distribution of development is that in general this should be a combination of needs of that community (see above) and employment opportunities, with the pro rata figure used as a guideline for the scale of development that may be appropriate. For the AONB, consideration of how / whether minor development could be effectively integrated while maintaining the character of the landscape and settlement should also be given great weight, in accordance with Government guidance.

Comments on proposals specific to settlements

South Wootton

At the time of designation of the AONB in the 1960s, South Wootton was a small settlement based around the network of roads to Gaywood, Castle Rising and North Wootton, more or less contiguous with Gaywood, with no significant development abutting the AONB boundary to the

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east. North Wootton was a scattering of buildings to the north, some closely abutting the AONB boundary. There was also a scattering of development between South Wootton and Rising Lodge on the south side of Grimston Road, close to or abutting the AONB boundary.

Although since that time there has been very significant development at both South and North Wootton, as well as to the south of Grimston Road, which has had some impact on the setting of the AONB in this area, the AONB boundary has effectively been respected in that development has not been allowed to encroach into the AONB.

Site 817/818/446 is considered 'partially accepted' by the SHLAA, which considered that "The land is entirely within an AONB and therefore only minor scale development, if any, is likely to be acceptable."

I consider that any development on this site is unacceptable. Development within the AONB here cannot be justified on the basis of need of a community in the AONB, and there are alternative sites available to meet the development needs of Kings Lynn and South Wootton. Allowing any development would lead to long term issues for AONB designation (see comments under 'major development' above).

North Wootton

I agree with the findings of the SHLAA that Site 712 is unsuitable for development, although this appears to be mainly because of access. In addition to this constraint, there is no justification for development in the AONB at this location, as there are alternative sites available to meet development needs, and allowing any development would lead to long term issues for AONB designation (see comments under 'major development' above).

Hunstanton

At the time of designation of the AONB in the 1960s, development was almost completely to the west of the A149. This has largely remained the case, apart from one area of development to the east of the A149, and a gap between the settlement and the AONB has been largely maintained.

I recognise that some expansion of Hunstanton has been agreed through the Core Strategy, but suggest that as far as possible the gap between the AONB and the settlement of Hunstanton is maintained.

It appears likely that Site 834/759/603/997 may have some visibility from the AONB to the east, but would be likely to have less impact on the setting of the AONB than Site 833, which sits on land rising from the south west. Site 828, although also narrowing the existing gap between Hunstanton and the AONB boundary, may have less impact because of the nature of the AONB west of the northern part of Hunstanton (Old Hunstanton Park, which has a boundary of trees).

So it may be that using as much as possible of sites 834/759/603/997 plus parts of sites 828 and/or 833 would be the most appropriate option. However, a proper impact study should be undertaken to assess the best location for development in terms of potential impacts on the setting of the AONB.

Brancaster / Brancaster Staithe / Burnham Deepdale

Brancaster has seen significant development to the south of the A149 and at its eastern end since AONB designation. Brancaster Staithe was a ribbon development along the coast road at the time of designation, with Burnham Deepdale as a more nucleated settlement around the church, although the distinction between these two settlements has now more or less been lost. Development since designation has been fairly minor overall, but has had some effect on settlement character.

As a significant development site has already been identified within Brancaster (site 810 in the SHLAA), it seems unnecessary to identify further sites, given the 'pro rata' figure of 11 homes for this group of settlements.

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Of the other potential sites identified, I regard 217/718 as unacceptable even for partial development because of Scheduled Monument constraints.

If further development is demonstrated to be required to meet local needs, sites 267, 183 and 721 should be carefully assessed to determine which parts could meet the need with least impact.

Burnham Market

Burnham Market retains more or less the form it had at the time of designation of the AONB, with some extension to the north from that pattern. The open spaces within the village are important to its character.

I agree with the assessment of several large sites proposed through the SHLAA process (825, 827, 852, 949, 1083) as unacceptable.

Site 826 is important to village character, and its use for car parking would be a significant change, which would be damaging to that character. I therefore do not support development of this site.

Sites 673 and 1021 appear too peripheral to the village centre and services.

For small scale development demonstrated to be required to meet local needs (pro rata guideline figure of 13 homes), I would prefer assessment of the most suitable sites / parts of sites from 922, 919, 923 and 145.

Dersingham

At the time of designation of the AONB in the 1960s, the boundary was drawn more or less along the southern edge of the settlement, so the AONB context has remained similar, although Dersingham has grown significantly to the north of the AONB.

Although no sites have been proposed in the AONB, given the pro rata guideline figure of 63 dwellings, it is not clear that enough potential sites have been identified to enable development of this scale. For reasons made clear elsewhere, I would regard proposals for any housing expansion into the AONB as unacceptable.

Heacham

At the time of designation of the AONB in the 1960s, Heacham was essentially west of the AONB, with a gap between the main settlement and the AONB boundary. Since designation, the settlement has grown around more or less the original pattern, although an area of development to the north east has encroached into the AONB, and much intensified development on the eastern side now abuts the AONB boundary (coincident with the A148).

In order to maintain the setting of the AONB as far as possible, by maintaining a gap between the settlement and the AONB boundary, I prefer the parts of the sites identified as 'partially accepted' sites in the SHLAA and SSA document that are towards the west of this group of sites (sites 441/184). These are also better related to the centre of the settlement.

<u>Snettisham</u>

At the time of designation of the AONB in the 1960s, the AONB boundary was drawn abutting the north western part of the village. It has since grown more or less around the original pattern, maintaining some distance from the AONB to the north and west in general with the exception of a separate area of scattered development to the west abutting the AONB boundary.

I agree with the SHLAA that sites 854 and 551/191 are unacceptable, being within the AONB, and that site 1098, on the AONB boundary, is also unacceptable.

Given existing development, site 549/189 on the edge of the AONB is unlikely to make a significant difference to the setting of the AONB, so I regard this as acceptable.

Site 190/550 is considered 'partially accepted' by the SHLAA on the basis that "Part of the site has already been developed providing 15 affordable dwellings and there are existing farm

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buildings on the centre of the site. The site is wholly within the AONB and is therefore unsuitable for major development and the site would need to be reduced."

I consider that any further development on this site is unacceptable. Development within the AONB here cannot be justified on the basis of need of a community within the AONB. There are some alternative sites available to meet the development needs of Snettisham, although possibly not of the scale of the 35 homes pro rata guideline. Allowing any further development on this site would lead to long term issues for the AONB designation (see comments under 'major development' above). If the site is accepted for some small scale development, this would lead to pressures for ongoing small scale development up to the bypass. The result of this would effectively be that of redrawing the AONB boundary without due legal process.

Burnham Overy Staithe

Burnham Overy Staithe appears to have retained more or less its original form since AONB designation in the 1960s, with some growth and infill on this pattern.

Given the guideline pro rata figure of 2 homes for this settlement, I would regard part of site 791 as acceptable in principle to meet proven local need at this scale.

However, although I was unable to download the SHLAA map, it appears that site 809 (land at Glebe Lane) was also proposed. This is a combination of three sites in close proximity, within the existing settlement boundary so 'minor development' is acceptable in principle, although this site is not included on the SSP map. There may therefore be no need for any further allocation here.

Sedgeford

At time of designation of the AONB in the 1960s, most of the village was in the AONB, with some settlement along Docking Road to the east. This has remained the case, although the village in the AONB has expanded a little, more or less on the original pattern.

I agree with the SHLAA that the very large proposed site abutting the AONB boundary (1137) is unacceptable, as is the smaller site in the AONB (554/194).

I agree that site 26/882 is unsuitable for major development, but given the guideline pro rata figure of 5 homes, it offers a better option overall than site 768 for meeting proven local development needs at this scale.

Thornham

Thornham appears to have grown more or less on its original pattern since time of designation, with growth / infill on this pattern. The central open space is an important part of the settlement's character.

Given the nature of the village and the constraints, neither of the two sites considered potentially / partially acceptable for development appears ideal.

Since the pro rata guideline figure is only 4 homes, it may be better to meet this elsewhere unless there are particularly pressing local development needs. Otherwise, the western part of site 186 appears preferable for development of this scale, allowing shorter access onto the coast road.

Yours sincerely

Tim Venes

Norfolk Coast Partnership Manager

Issue 46: Thornham

Ian Reilly (906) - Fleur Developments



Appendix 3 –Norfolk Coast Partnership Representation Preferred Options

From: <u>Venes, Tim</u>

To: ldf@West-Norfolk.gov.uk

Subject: Kings Lynn and West Norfolk Local Plan - Detailed Policies and Sites Plan "Preferred Options" (Regulation

18) consultation

 Date:
 02 October 2013 16:26:53

 Attachments:
 13-10 NCP response.pdf

Please find attached a response to consultation on the above.

Regards,

Tim Venes

Norfolk Coast Partnership Manager

Norfolk Coast Partnership

South Wing, Fakenham Fire Station Norwich Road Fakenham Norfolk NR21 8BB

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LDF Team Borough Council of Kings Lynn and West Norfolk Kings Court Chapel Street KINGS LYNN

Norfolk Coast Partnership South Wing Fakenham Fire Station Norwich Road FAKENHAM Norfolk NR21 8BB Tel: 01328 850530 email: aonb@norfolk.gov.uk www.norfolkcoastaonb.org.uk

02 October 2013

Dear Sir

Kings Lynn and West Norfolk Local Plan - Detailed Policies and Sites Plan 'Preferred Options' (Regulation 18) consultation

Area-wide Policies

I support the draft area-wide policies in general, and see them as adding useful detail to core strategy policies.

I particularly support those providing specific consideration of need to have particular care regarding appropriate development in the Norfolk Coast AONB i.e. POAW 11 and16, and the inclusion of AONB setting in POAW 11. I recognise that many other draft area-wide policies will also help to conserve and enhance natural beauty in the Norfolk Coast AONB and North Norfolk Heritage Coast.

Draft Allocations

I appreciate the consideration given to comments from the previous round of consultation (Issues and Options) and feel that the Borough Council has in general made commendable efforts to balance the need to allocate land for development with environmental and other constraints. I support the preferred options for settlements in and on the boundary of the Norfolk Coast AONB in general, given the conditions on development proposed in the policies relating to these sites.

Further comments on preferred options for settlements in and on the boundary of the Norfolk Coast AONB are:

Hunstanton

Although I expressed a preference for land on the south side of the town in the previous round of consultation, I appreciate the reasons for not including this as a preferred option. While preferred options H1, H2 and EMP4 extend development to the east of the A149 towards the AONB, reducing the gap between the town and the AONB boundary, I would not anticipate that this will have a significant impact on the setting of the AONB, and do not object to these preferred options.

Brancaster / Brancaster Staithe / Burnham Deepdale

The allocations under the preferred options are close to the indicative allocations for this group of settlements designated as a key rural service centre. I consider that, given the conditions contained in policies BRAN1 and DEEP1, the preferred options can potentially be accommodated



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satisfactorily into the existing settlements without significant impacts on natural beauty, and therefore support the preferred options.

Burnham Market

The preferred option BM1 is one of the options that I preferred in the previous round of consultation, so I support this preferred option in principle. I appreciate that although the proposed allocation is well above the indicative allocation, it provides an opportunity to fund facilities needed by the community.

I suggest that the provision of additional car parking for the settlement could provide environmental gain by linking, if possible, to control and management of car parking in the village centre, as this has long been an issue in terms of congestion (affecting the Coasthopper bus service at times) and the character of the conservation area.

Burnham Overy Staithe

I support the reasons for not allocating a preferred option site.

Dersingham

The preferred option is for a site on the south eastern side of the village, away from the AONB, so I would not anticipate any AONB landscape impacts and support this preferred option.

Heacham

The proposed allocation of 66 dwellings on preferred option sites HEA1 and HEA2 is close to the indicative allocation of 63.

The major site, HEA1, is well related to the current form of the village and I would not expect housing here to have any significant impacts on the setting of the AONB, so I support this preferred option.

HEA2, although only 6 dwellings, is very close to the AONB boundary and the Conservation Area, and not so well related to the current form of the village.

However, I accept that its additional impact on the setting of the AONB would be likely to be minor at most, and probably negligible, and do not object to this preferred option.

Sedgeford

Although other potential sites are outside the AONB, I would not expect the preferred option SF1 to have significantly detrimental landscape impacts in the AONB and support this option for the reasons given in the consultation document.

Snettisham

The preferred option is in line with my preference at the previous consultation, in terms of being preferable to other options within the AONB. However, as this site is on the AONB boundary, I suggest that Policy SNE1 should include a similar condition to that for other sites within the AONB or on the AONB boundary along the lines of the condition in Policy HEA 2 ("The design of development, and in particular its massing and materials, shall have regard to its potential impact on the setting of ...the Area of Outstanding Natural Beauty.")

Thornham

As explained in the previous round of consultation, I have reservations about all potential options including the preferred option of THM1. The concern of the Highway Authority adds to these. Allocation of THM1 would effectively remove the visual link between the open area in the village and the marshes to the north, which is an important part of the village's character. Since all options appear problematic, I would prefer that no allocations were made in Thornham.

North and South Wooton

I support the rejection of potential sites within the AONB as preferred options.

Knights Hill

This preferred option has a frontage on the AONB boundary. Although this would be effectively an extension of existing development alongside the A148, which marks the AONB boundary here, for

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consistency the policy for this allocation should include a similar condition to that included in policies for other allocations in or adjoining the AONB ("The design of development, and in particular its massing and materials, shall have regard to its potential impact on the setting of ...the Area of Outstanding Natural Beauty.")

Yours faithfully,



Tim Venes Norfolk Coast Partnership Manager