



King's Lynn and West Norfolk Site Allocations and Development Management Policies

Issue 9: Downham Market (F.1) Tuesday 14 July 2015 at 09.30.
Albanwise Ltd (ref: 819)

Question 9.1: Is there evidence that any of the following proposed residential development sites in Downham Market are not justified, sustainable, viable, available or deliverable:

- Land off St John's Way (F1.2 – employment)
- North-East – east of Lynn Road (F1.3)
- South-East – north of the southern by-pass (F1.4)

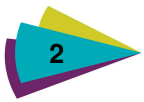
If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

1.1 It is considered that site F1.3 is fully justified and will contribute to the delivery of a sound plan. Site F1.3 presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in NPPF. In summary

- Policy F1.3 is 'justified' and presents the most appropriate site when compared against other reasonable alternatives. The site is not covered by any strategic constraints which would prevent it coming forward for development. The site is currently an arable field and former airfield of limited ecological value and landscape quality, and with a high potential to accommodate development. The allocation of the site is consistent with the Adopted King's Lynn and West Norfolk Core Strategy: the site is within the Area of Search for new housing development as identified on the Key Diagram for Downham Market (document reference GD01, figure 9 page 101).
- North East Downham Market also provides a highly deliverable and developable site in line with guidance in the NPPF¹. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing will be delivered within five years. The site presents a logical and sustainable location for new housing provision.
- The site can deliver a quality development to meet immediate LDF requirements of at least 250 homes. It also has the ability to deliver development on land free of any overriding constraints. The land also has longer term potential to assist with future development needs in a coordinated manner.

1.2 Albanwise supports the approach provided in Policy F1.3 and considers that this provides a positive policy framework to deliver high quality sustainable development to the north east of the Town.

¹ NPPF (2012) footnote 11, page 12



AMEC Foster Wheeler is well advanced in preparing a planning application and has prepared an evidence base of technical reports which demonstrate the suitability of this site and its advantages over other development options. A summary of current technical work undertaken in support of a planning application at site F1.3 is summarised below:

- Pre-application discussions: an Environmental Impact Assessment (EIA), Screening Request was submitted to the Council on 20 April 2015. A response is expected shortly although on the basis of discussions with the Council, this is unlikely to be considered EIA development. A further pre-application meeting is also being sought with King's Lynn and West Norfolk Borough Council to agree the scope of a planning application.
- Masterplanning and Landscape: work on an initial masterplan is progressing. Initial designs show how the site can contribute to the Council's sustainability objectives. The site can deliver a high quality development to meet the Local Plan requirements of at least 250 homes. Development provides opportunity to improve the landscape framework around this part of the 'hard' urban edge of the Town with a new and sensitively designed gateway when approaching from the north and landscape framework integrating development into the wider landscape.

The masterplan will also demonstrate how a sensitive design will ensure the site will have no material impact on the setting of the Wimbotsham Conservation Area. Given the distance between the site and the village, there would be no serious encroachment towards the village, a point acknowledged by the Inspector during the course of the Core Strategy examination and by the Council's sustainability assessment (document reference SA01, page 128).

- Transport and Access: A transport assessment is currently being prepared. The scope has been agreed with the County Highways Authority. Baseline work has been conducted which shows no particular issues in relation to bringing the site forward for development. Surrounding roads and junctions have capacity to accommodate this development. Furthermore, with transport analysis showing the dominant direction of movement being to the north (around 60% of traffic from Downham Market), there is an advantage of locating development to the north of the town to minimise traffic impacts of the Town.

A suitable access on to Lynn Road has been designed. The transport assessment will also highlight that this site has excellent pedestrian and cycle links which are already in place and have no requirement for improvement. It is well located to local services, employment opportunities, schools and nearby amenities and performs excellently in sustainability terms. Unlike other development options in the Town, this highly permeable site will encourage transport modes other than by private car. The site has further opportunity to enhance existing footpaths and bridleways to maximise sustainable links.

- Flood Risk: unlike many areas within the Borough, the site is not at risk of flooding and the area proposed for development is entirely located in Flood Zone 1 (lowest probability of flooding). AMEC Foster Wheeler is preparing a flood risk assessment which will confirm that the area of land proposed for development is outside the flood risk area and suitable for development. This will also include an outline drainage strategy to ensure that the development does not increase surface water runoff onto adjacent land.



- **Heritage:** a desk study has identified that there is a low to medium potential for the presence of archaeological remains within the site boundary on the basis of records of previous investigations and chance finds within the surrounding area. However, no archaeological finds or features are recorded from within the site boundary, other than the presence of the former RAF Downham Market. There is also evidence of previous disturbance within the site as a result of a former sand and gravel pit in the west, two water mains which bisect the site and part of RAF Downham Market itself. These elements would have removed any archaeological remains which may have been within their footprints and whilst they do not cover the whole site they do extend across the area, and taken together would have affected the integrity of any remains which may have been present. It is therefore unlikely that the site will contain archaeological remains with an extent or importance to affect its suitability for a residential development. There has been no objection to the site from Historic England.
- **Ecology:** An ecological survey, including desk study and phase 1 habitat survey has been carried out. This identified no statutory designated nature sites within or near to the site. Subsequent ecological surveys undertaken in 2013 and 2014 including for breeding birds, reptiles and bats have shown the site is of limited ecological value. The site is intensively cultivated and development offers potential to improve the overall ecological value of the site through the provision of new areas of open space and drainage features for example.
- A Phase 1 Land Quality Assessment (LQA) including site walk over and desk based analysis has been undertaken for the site. There are no known constraints to development, although some limited intrusive site investigation is recommended prior to development of the site due to historical MOD activity in the area, and a historic sand and gravel extraction in the northern area. These further investigations can be dealt with prior to any development.
- **Minerals:** a minerals assessment has been completed and concludes that development of the Site would not trigger the need for the extraction of resources prior to development taking place.
- **Utilities:** a utilities search has identified a 24" and 15" water main crossing the site. Anglian Water have been consulted and advised the 24" pipe requires a 9m building easement and the 15" pipe will require a 6m easement. The emerging masterplan has sought to avoid development in this area and will use the area of the water pipes and their easement as a green corridor/open space, thereby improving the green infrastructure offer in this part of the Town.

1.3 Overall, Albanwise considers that the site is the best option to deliver sustainable development in the Town when assessed against alternative options. The Council's evidence base supports the allocation of site F1.3 and highlights that the allocation of land at North east Downham Market meets the tests of soundness set out in NPPF Paragraph 182 including the test of 'justified'. In order for the plan to meet this test it should provide *'the most appropriate strategy when considered against other reasonable alternatives'*. Should additional development land be required in the Town, the focus of growth should be on North East Downham Market rather than less suitable locations such as site F1.4 (South East Downham Market). Site F1.3 outperforms site F1.4 in a number of respects.

1.4 In assessing the suitability of sites, there is a need to consider the sustainable development merits of site options holistically. In commenting on the merits of sites in Downham Market, promoters of the site south-east of Downham Market (F1.4) appear to be concentrating on aspects of their site

which are favourable to them whilst overlooking less favourable aspects. In particular they highlight that the site is closer to the Town Centre. As shown in **Appendix A** the actual difference between the distance of both sites to the Town Centre is marginal and should not weigh in favour of a site which performs less well than F1.3 in all other respects as outlined below.

- 1.5 Site F1.4 would infill land between the edge of the town and the A1122. Whilst on plan this seems a logical extension to the Town infilling land inside the by-pass, it is less integrated and permeable with surrounding neighbourhoods than Site F1.3. The plan in **Appendix A** also illustrates the superior connectivity and opportunities to integrate with surrounding neighbourhoods when compared to site F1.4. Site F1.3 also provides an opportunity to link the provision of homes and jobs in tandem with the consented employment land at Bexwell.
- 1.6 Furthermore, analysis of the quality of pedestrian and cycle links outlined in our pedestrian and cycle audit previously shared with the Council, also highlights the advantages of Site F1.3 over Site F1.4. Site F1.3 has existing footpath and cycle links which require no significant improvement. Conversely, links to Site F1.4 comprise mainly narrow rural lanes with no footpaths and no street lighting with limited opportunities for improvement. This may therefore provide difficulties in achieving integration with surrounding development. This fact has been confirmed by an objection from County Highways who raised serious concerns about the adequacy of sustainable links to site F1.4 during the course of a current application for 170 homes (still pending consideration) with limited opportunity to upgrade the only pedestrian link to the site. In commenting on the application they stated:

“The proposed links for pedestrians and cyclists to local facilities are considered totally inadequate. The access strategy for pedestrians and cyclists relies totally on the existing PROW Nightingale Lane and then Ryston End. However this route is not of an appropriate standard to serve as the main ped/cyclist access route to facilities in the town from this development. Whilst it would be possible to up-grade Nightingale Lane and have an adoptable shared use footway /cycleway, it is considered that Ryston End cannot be up-graded to act as a suitable walking/cycling route. The site is not provided with any pedestrian /cyclist facilities westwards to London Road nor are there any improvements to walking /cycling facilities on London Road to produce an acceptable route via London Road into the town. The site has no bus service within 400m of the site and so cannot be considered to be adequately served.”

- 1.7 Therefore, although marginally closer to the Town Centre, the inadequacy of pedestrian links to the Town Centre means that Site F1.4 is actually far less accessible by sustainable means. Furthermore, analysis of bus routes (see **Appendix B**) highlights the benefits of site F1.3 over F1.4. As noted above, the primary traffic distribution is north towards Kings Lynn as are most good frequency bus services. This highlights further advantages, in that traffic impact on the Town Centre and A10 bypass would be minimised by facilitating quick access north to the A10 and the potential for bus based trips increased given alignment with existing high quality services. Only one route (Route 37) passes through the south of the town and is not accessible to site F1.4 due to the inadequacy of pedestrian links.
- 1.8 Albanwise also question whether Site F1.4 is an achievable option. The site will require access onto the A1122 which whilst stated in policy F1.4 would not be permitted by Policy DM12 ‘Strategic Road Network’ of the Site Allocations DPD (Document reference: SADMP01). This inherent policy conflict would render the allocation undeliverable as the Highways Authority usually resists new points of access onto the strategic road network.

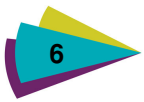
- 1.9 Whilst Site F1.3 is considered to be of low sensitivity in landscape terms with high capacity to accommodate development, the landscape character of site F1.4 is rare for this area and is of higher sensitivity and is visually attractive from key entry points to the Town. It provides an attractive rural setting to the Market Town. This point is acknowledged by the fact that site F1.4 is covered by an area of 'Important Landscape Quality Designation' in Saved Local Plan Policy 4/6. Site F1.3 is not covered by this designation. Being part of the former airfield, site F1.3 also comprises partly brownfield land.
- 1.10 Overall, given the strategic benefits of bringing forward land in the north of the town, combined with fewer constraints to development, AMEC Foster Wheeler considers site F1.3 should be sequentially preferred before land at the south east Downham Market if only one site in the Town is required, or additional development land is needed to boost supply.
- 1.11 As noted in our response to Issue 2, whilst we generally support the Plan we have a few concerns about the Council's housing supply in terms of constraints on some sites, the objectively assessed need and the length of the plan period. In accordance with the emphasis of NPPF to ensure local plans are **positively prepared** (paragraph 182) and **significantly boost housing supply** (paragraph 47) we recommend that the Plan should be more positive and it should be made clear that North East Downham Market will be the obvious future location for growth beyond the Plan Period. In line with our response to Issue 2, Policy F1.3 should also make clear that the settlement boundary of Downham Market can be reviewed to deliver additional homes if annual monitoring shows other sites are not delivering as anticipated.
- 1.12 Albanwise would also be willing to bring forward land on the former draft allocation DW1 'land South of Low Road' identified in the Preferred Options consultation (July to August 2013). Notwithstanding its de-allocation, which is considered unjustified, this is a sustainable location for new development. The site can make a significant contribution to increasing the supply housing to assist the Council in meeting its housing needs as part of a longer term strategy for growth at North East Downham Market.
- 1.13 Whilst the Council's sustainability assessment (document reference SA01) raises concerns about site DW1 closing the gap between Downham Market and Wimbotsham, it provides a logical and sensible infill essentially rounding off the settlement edge. This point was acknowledged by the Inspector in considering the Core Strategy who confirmed that land at paragraph 79 of his report, that site DW1 could be developed without serious encroachment upon Wimbotsham. The site is contained by existing residential development along Lynn Road to the east and Kingfisher Road to the south. New structural landscaping formed by an extension to the Kingston Plantation would provide a long term defensible boundary protecting the setting of Wimbotsham and the integrity of the gap between the two settlements.

Suggested amendments to Policy F1.3

Proposed additional wording to Policy F1.3 to reflect the sustainable development merits of Site F1.3 over other development options.

f. a network of roads, and cycle and pedestrian routes, which would facilitate potential future development beyond the eastern boundary of the site as the preferred direction for growth;

F.1.24 There appear no fundamental constraints to development, and there is the potential for future expansion to the east and south beyond at some point in the future (subject to future development plans). In the long term this could potentially help link to future employment and leisure development at Bexwell to the east. As the preferred direction for growth further development on



site F1.3 will be permitted if annual monitoring shows that the delivery of housing will fall below the required levels.

Question 9.2: Is there evidence that neighbourhood shops/ community facilities would be justified at east of Lynn Road and/or north of the southern by-pass. If there is justification, should the Council's approach to the delivery of such facilities be stronger?

- 1.14 Policy F1.3 identifies a number of infrastructure requirements such as allotments, school places, neighbourhood shops and community facilities which in our view may not be deliverable from an allocation of 250 dwellings. To provide more certainty for the landowner and Council, and to give the ability to plan for infrastructure requirements in the long term, the policy should make it clear that the wider site will be the focus of long term development for the Town. This will also give more certainty at the masterplanning stage.
- 1.15 As noted above, Albanwise's land outperforms other options in Downham Market being better connected with adjoining neighbourhoods and opportunities to utilise existing high quality pedestrian and cycle links with little need for improvement. Being better integrated it can offer longer term strategic improvements to the transport and highway network which other sites cannot offer. The extent and the flexibility of Albanwise's landholding provides a significant opportunity to plan for the long term needs of the Town. The north east of the Town should therefore be the priority to meet any latent demand in the current Plan Period and also to cater for long term development needs to plan for longer term infrastructure requirements in a co-ordinated manner.

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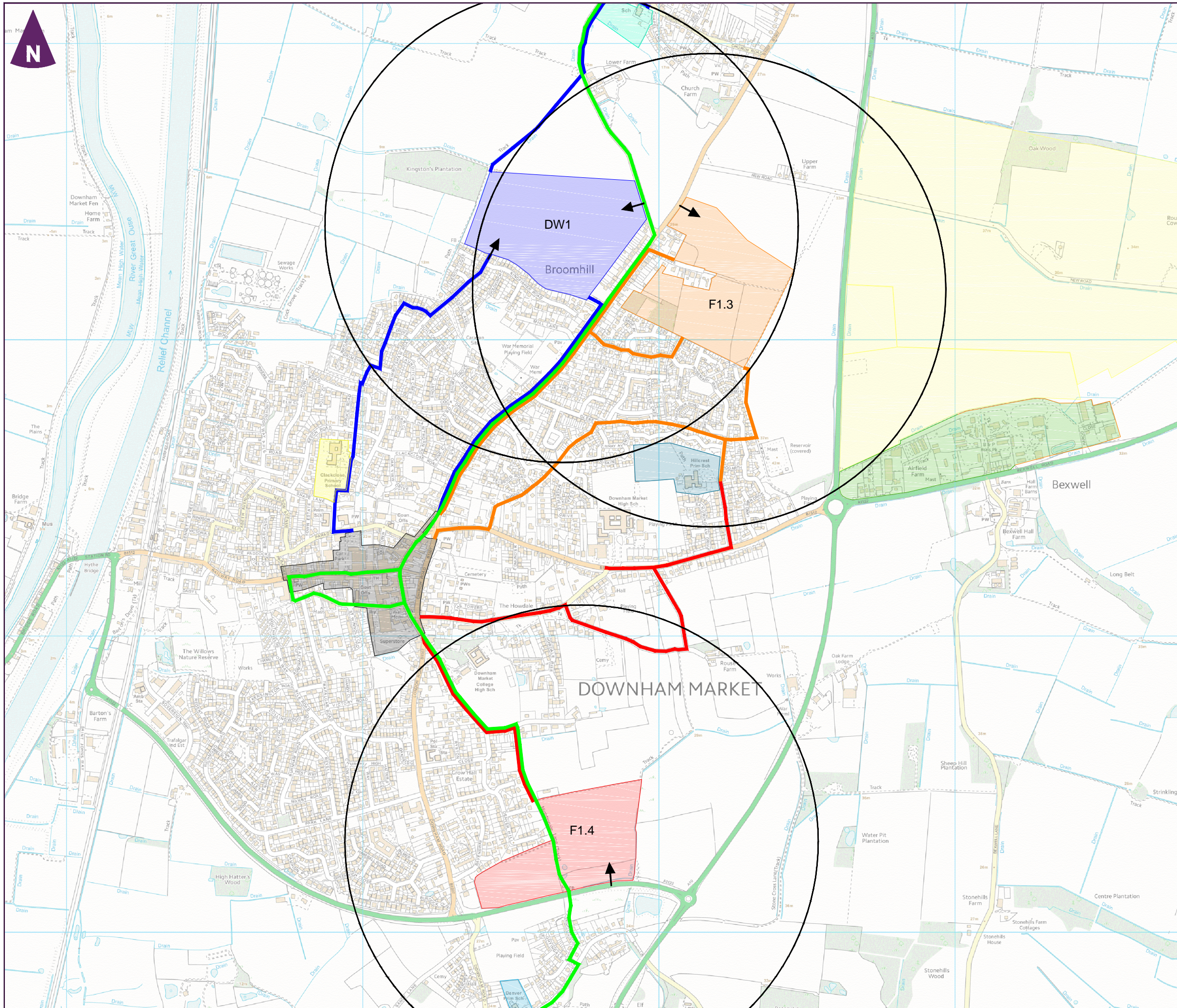
Appendix Contents

Appendix A – Map of pedestrian connections

Appendix B – Map showing existing bus routes



Appendix A – map of pedestrian connections



- Allocated Site (F1.3)
- Allocated Site (F1.4)
- Former Draft Allocation (DW1)
- Existing Business Park
- Consented Employment Park, Hotel and Golf Club
- F1.3 Pedestrian/Cycle Links
- F1.4 Pedestrian/Cycle Links
- DW1 Pedestrian/Cycle Links
- Clackclose Primary School
- Denver Primary School
- Hillcrest Primary School
- Wimbotsham School
- Town Centre
- Sustrans Route 11
- 800m Isochrones from centre of the Site
- Site Access

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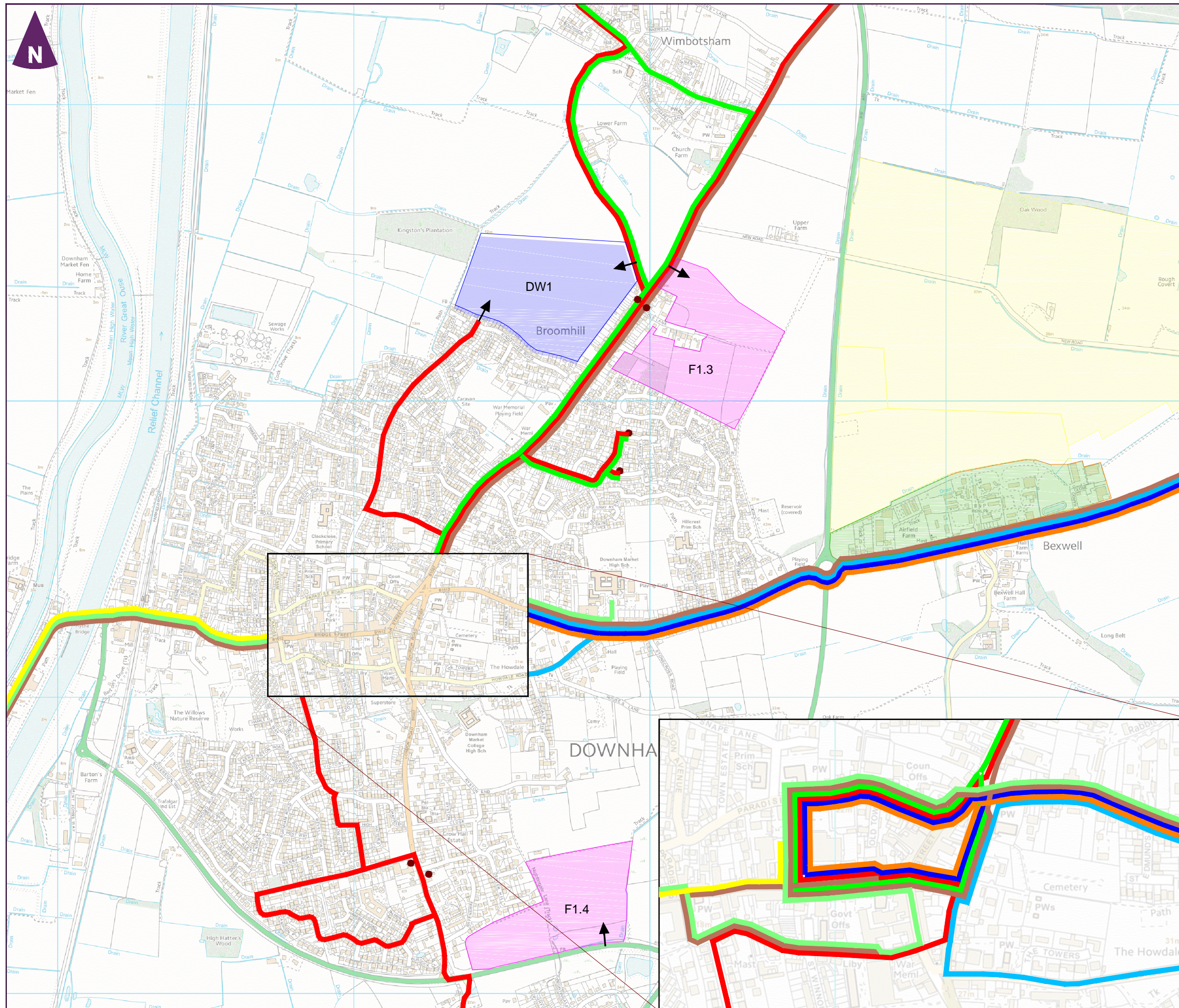
Land at North East
Downham Market



**Downham Market Proposed Allocations
Pedestrian/Cycle Connectivity**



Appendix B – Map showing existing bus routes



- Allocated Sites
- Former Draft Allocation DW1
- Norfolk Green Route 37
- Coaches Services Route 40
- West Norfolk Community Transport Route 47
- Eagles Coaches Route 52
- Eagles Coaches Route 53
- Norfolk Green Route 60
- West Norfolk Community Transport Route 61
- West Norfolk Community Transport Route 62
- Eastlings Coaches Route 65
- Bus Stops
- Consented Employment Park, Hotel and Golf Club
- Existing Business Park
- Site Access

Land at North East Downham Market



Downham Market Proposed Allocations Bus Connectivity