

LOCAL PLAN HEARINGS - Issue 21 – question 21.1

PROPOSED ALLOCATION G42.1

Some development in this location could be sound if the overall policy was to expand home creation in the settlement as part of a desirable strategy to sustain the settlement and its services. In the absence of such a policy - indeed in the presence of policies aimed at severe limitation of such home creation - it is unsound at two levels.

There is an unjustified assumption that all the new homes proposed for the settlement should be on a single site. Some alternatives officially designated by the LPA as "reasonable" have been ruled out on the grounds that they could not take all 10 proposed new homes. Representations to that effect have been made repeatedly but no reasons have been advanced in defence of the "all on one site" presumption.

Then there are the particular features of site G42.1 as compared with other "reasonable alternatives" such as those coloured green in the map in Appendix 2 of the Preferred Options document on page 179 and in the corrected version issued in September 2013 after the omission of site 1229 from the selection process had been brought to the LPA's attention – issued as pages 348-350. The LPA simply copied the ratings given to adjacent plot 1174.

The unsoundness of the selection of G42.1 is heightened by the fact of it being made when site 1229 had not been considered through simple official oversight. But unsoundness must also be judged by reference to factors put forward by the LPA – with reference to Sites 1229 and 1174 and in its comparisons. (See Table 1)

The un-quantified "professional and political" considerations said to have been weighed alongside the quantified "technical" ones to result in the selection of G42.1 are generally un-stated but the following four, offered against 1229/1174, are touched on in the LPA's table of "Main comparative reasons for selection". The four in favour of G42.1 are at least equally true of 1229/1174 if not more true.

Sites 1229 and 1174 are said to be unsuitable for allocation [i] because they are proposed to remain partly within the settlement boundary. (They were put forward precisely because the LPA is proposing to re-designate parts of them as Countryside.) I submit that it is a most contrary notion that a site should not be allocated (in effect as an extension of the settlement) because part of it is proposed to be inside the settlement boundary anyway.

They are also said to be unsuitable for allocation [ii] because they could not accommodate all of the proposed additional homes (10) and so would not meet the threshold for providing affordable housing – which is 5!. As has been referred to, two sites each taking 5 would deliver as many affordable homes as one with 10.

Furthermore, they are said to be unsuitable for allocation [iii] because they already have one road-fronting dwelling on each. (Until fenced off from the rest of the garden of 16, Lynn Road, the same was essentially the case with G42.1. In either case, the existing 1970s dwellings could be integrated in new development.

Finally they are said to be unsuitable for allocation [iv] because as "backland development" they would be of poor design and have access problems. These assumptions (and judgements) about the forms of their possible development are neither warranted nor justified. No such policy is established.

TABLE 1

**Comments on Application of LPA's Claimed Site Sustainability Factors
to the proposed Allocated Site and those Reasonable Alternatives
having the highest technical scores.**

LPA Criteria	G42.1	1229 or 1174	Representors' Comments
<i>Access to Services</i>	Positive (+)	Highly Positive (++)	G42.1 is actually much further from the service reference points with no footway link.
<i>Community & Social</i>	Positive (+)	Positive (+)	Apparently based on no local comments being received. Also no statement is made of the community benefits being attributed so not allowing comparison.
<i>Economy A Business</i>	Neutral (0)	Neutral (0)	Any new homes will help sustain business – the greater nearness to inn and shop would logically yield greater benefit from 1229/1174.
<i>Economy B Food Production</i>	X	X	All 3 are private garden land though G42.1 has been neglected. All talk of grade 3 farm land and food production is irrelevant and theoretical.
<i>Flood Risk</i>	+	+	All 3 have no risk.
<i>Heritage</i>	0	0	All 3 have no impact.
<i>Highways/Transport</i>	#	#	All 3 have no problem.
<i>Landscape/Amenity</i>	#	X	These seem simply perverse. The attributed negative impact of 1229 or 1174 is unstated and hard to imagine! Whereas the adverse amenity and landscape effects of G42.1 (esp. biodiversity) have been identified in complaints.
<i>Natural Environment</i>	?	0	Accepted
<i>Infrastructure, Pollution & Waste</i>	?	?	1229 or 1174 would require less added public infrastructure

It is submitted that the allocation process involved here has been demonstrably unsound. Despite the questionable elements identified in Table 1, in the LPA's Technical Assessment of sites put forward, sites 1174 and 1229 gained a best equal score of 76 from their Stages 1 and 2 compared to 47 for G42.1 (the LPA proposed allocation site). Such "professional and political" considerations offered on are at best weak and not explained or attributed, and were not arrived at by public process.

The Hearing has been asked to consider the designated "reasonable alternative" site 1173 possibly linked to 906. 1173 scored better than G42.1 even with errors noted below which, if corrected, would have placed it even further ahead. Of the unquantified "professional and political" considerations said to have been weighed alongside the quantified "technical" ones, the following three offered against 1173 are touched on in the LPA's table of "Main comparative reasons for selection".

The claim about possible smells is unsupported by any evidence. Neighbours all around deny that they experience such problems. The other point offered against 1173 is totally and demonstrably mistaken and results from a confusion (already acknowledged) between sites east of and west of Stocks Close.

Development on site 905 (to the east) would involve the blocking of a very valuable public view across miles of open country toward Docking - the disadvantage which is claimed by the Council - and would also have severe problem of safe access which the Highway Authority would predictably raise if consulted. In contrast, the public view across 1173 which could be diminished extends only to the opposite side of that site. Photographs demonstrating these facts have been supplied to the LPA and not questioned.

Furthermore, the reference to open space between Great Bircham and Bircham Tofts is similarly confused as 1173 is in the very centre of Gt Bircham whereas 905 does indeed constitute the claimed open break between it and Bircham Tofts.

Finally, site 1173 (possibly linked to 906) could provide community benefit in a form which G42.1 could not. There is a highway problem with parking whenever there are significant functions at the church and a small part of this Church owned land (almost opposite the church gate) could be devoted to solving that problem. Moreover, a substantial contribution to meeting the need for more small homes for elderly people could be made here. (The once nearby alms houses were demolished and replaced with market housing some 40 years ago.)

This respondent submits that G42.1 fails justification as the sole chosen Allocation site and that acknowledged reasonable alternatives have clearly not been satisfactorily considered by the Council.

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