

# **Borough Council of King's Lynn and West Norfolk**

## **Position Statement**

### **WISBECH FRINGE - Land east of Wisbech (Policy F3.1 of the Submitted Local Plan)**

**20 September 2022**

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## Background

1. The Land east of Wisbech is allocated for around 550 dwellings in the submitted Plan. This land is part of a Strategic Allocation that crosses the boundary between the Borough Council of Kings Lynn and West Norfolk and Fenland District Council known as East Wisbech. The remainder of the strategic allocation lies in the District of Fenland and allocated in Fenland District Council's Local Plan 2014<sup>1</sup>. Together they're allocated to deliver around 1,500 new dwellings, a new primary school, local centre and associated infrastructure. Importantly, as noted in the adopted policy wording, the allocation would require significant upgrades to the junction of the A47 with Broad End Road.
2. The site was initially introduced through the Borough Council of King's Lynn and West Norfolk's Core Strategy (2011)<sup>2</sup> where the plan supports the principle of the provision for at least 550 dwellings to the east of Wisbech. The nature and scale of development being dependent upon the outcome of work undertaken by Fenland District Council addressing the strategic role of Wisbech.
3. Policy F3.1 of the Site Allocations & Development Management Policies (2016) allocated approximately 25.3 hectares of land for at least 550 dwellings. The site is referred to as a planned expansion for Wisbech and describes it as a suitable and sustainable location for growth in West Norfolk. This plan also noted that joint planning with Fenland District Council was necessary to establish the ultimate form of the planned expansion.
4. In 2018, the Borough Council of King's Lynn & West Norfolk<sup>3</sup> and Fenland District Council<sup>4</sup> approved the jointly prepared East Wisbech Broad Concept Plan<sup>5</sup> (BCP) (D38) which, in broad terms, sets out the requirements for the site and where various types of development will be located. The BCP forms part of the planning policy framework for both councils and is a material consideration in the determination of planning applications for the site area.
5. To deliver housing growth in this location, the Wisbech Access Strategy<sup>6</sup> identified that access towards the A47 would need to be via a new/upgraded junction<sup>7</sup>, with the arrangements for delivering such an upgrade being agreed as part of the comprehensive delivery scheme encompassing both the allocation in the Borough of Kings Lynn and West Norfolk, and the allocations in Fenland District Council.
6. The allocation has been carried forward from the current Site Allocations and Development Management Policies LDD adopted in 2016 into the submitted Local Plan.
7. In response to the Regulation 18 consultation on the Borough Council of King's Lynn & West Norfolk's Local Plan, Fenland District Council's representation was supportive of maintaining the allocation stating, 'This council also welcomes the proposal to provide at least 550 new dwellings to the east of the town which will fall within the jointly agreed (May 2018) Broad Concept Plan for the area'. Fenland District Council made no representation to the Regulation 19 consultation.

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<sup>1</sup> Fenland Local Plan [https://www.fenland.gov.uk/media/10010/Fenland-Local-Plan-May-2014/pdf/Fenland\\_Local\\_Plan1.pdf?m=637261883246530000](https://www.fenland.gov.uk/media/10010/Fenland-Local-Plan-May-2014/pdf/Fenland_Local_Plan1.pdf?m=637261883246530000) Fenland Local Plan Policies Map for Wisbech [https://www.fenland.gov.uk/media/12303/Wisbech-Fenland-Local-Plan-2014-Policies-Map/pdf/Inset\\_Wisbech\\_A0\\_Adopted\\_New.pdf?m=637261880084500000](https://www.fenland.gov.uk/media/12303/Wisbech-Fenland-Local-Plan-2014-Policies-Map/pdf/Inset_Wisbech_A0_Adopted_New.pdf?m=637261880084500000)

<sup>2</sup> [https://www.west-norfolk.gov.uk/downloads/download/68/core\\_strategy\\_document](https://www.west-norfolk.gov.uk/downloads/download/68/core_strategy_document) Page 16, Policies CS01 & CS09

<sup>3</sup> BCKLWN Cabinet 29 May 2018 <https://democracy.west-norfolk.gov.uk/documents/g2460/Decisions%2029th-May-2018%2017.30%20Cabinet.pdf?T=2> (Public Pack) Agenda Document for Cabinet, 29/05/2018 17:30 ([west-norfolk.gov.uk](http://west-norfolk.gov.uk))

<sup>4</sup> Fenland Planning Committee 23 May 2018 <https://www.fenland.gov.uk/localgov/documents/g204/Public%20reports%20pack%2023rd-May-2018%2013.00%20Planning%20Committee.pdf?T=10>

<sup>5</sup> East Wisbech Broad Concept Plan <https://www.fenland.gov.uk/eastwisbechBCP>

<sup>6</sup> [Wisbech Access Strategy - Fenland District Council](#)

<sup>7</sup> [14176FDCPresentationBoard\\_10.pdf \(fenland.gov.uk\)](#)

8. The Borough Council of King's Lynn & West Norfolk submitted the Local Plan for examination on the 29 March 2022 and included the Wisbech allocation.

### Current Situation

9. The Draft Fenland Local Plan was presented and approved, subject to amendments, for consultation at the Cabinet meeting on 13 June 2022<sup>8</sup>.
10. Fenland District Council published their Local Plan for a Regulation 18 consultation on 25 August 2022. The Regulation 18 document excludes the part of the East Wisbech Strategic Allocation within their area. The Sites Evidence Report (published alongside the consultation) provides further information.<sup>9</sup>

### Implications/Considerations

11. A significant factor in the site selection was the proximity of the site to the adjoining Fenland District Council's allocation, creating a wider allocation which would enable the local planning authorities to take a comprehensive approach to development to the east of Wisbech Town. Policy F3.1 in the submitted Local Plan makes it clear that the site was to come forward as a comprehensive development in line with the BCP (D38 Page 42). Part of this comprehensive development would be the requirement to include upgrades/improvement to the A47 at Broad End Road.
12. Site F3.1 on its own would be unable to viably provide improvements to the A47 junction of the scale required and therefore the development would likely be unacceptable.
13. The BCP (D38 page 19) sets out the requirement that the strategic allocation would require the provision of a new primary school located within the central area and that a new secondary school would be needed in the wider Wisbech area within 5- 10 years.
14. Initial Officer comments from Norfolk County Council as the Local Education Authority, indicate that Site F3.1 allocation on its own would not justify a new primary school on site and would require expansion to existing primary schools where this is possible and that the surrounding primary schools of Emneth, Marshland St James, West Walton and Walpole Highway would have very little capacity to accommodate additional children from just this development.
15. Similar issues are raised in respect of secondary education provision with children needing to be accommodated within the catchment of Norfolk Schools at Marshland High; and/or St Clements High, both of which are some distance from Walsoken and would require transporting children to these school/s.
16. Given the above the County Council has significant concerns about such an approach and the sustainable delivery of allocated housing in Walsoken.
17. As Site F3.1 was originally considered as a planned expansion to Wisbech in conjunction with the adjoining site in Fenland, consideration has been given as to whether to retain the allocation in whole or in part considering Fenland District Council's intention not to take forward the adjoining strategic site allocation.

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<sup>8</sup> Agenda item - [Draft Local Plan - Fenland District Council](#). The debate is also on the FDC YouTube page: <https://youtu.be/scL5Zqxp20>. Although not specifically about the East Wisbech Allocation, from the 38th minute onwards, the debate explains the rational and background around how existing Broad Locations for Growth have been assessed and decisions made. A strategic political decision was taken to remove any Broad Concept Areas without significant progress towards a planning application.

<sup>9</sup> Fenland District Council Sites Evidence Page 18 [PE01-4 Sites Evidence Report Aug 22.pdf \(fenland.gov.uk\)](#)

18. It is considered that retaining all or part of the allocation of F3.1 would not result in a sustainable development in its own right and is only sustainable as part of the larger comprehensive development and dependent on the improvements to the A47 to deal with traffic impacts.

### 5 Year Housing Land Supply/Housing Supply

19. Site F3.1 does not benefit from any planning permissions at present. The Housing Trajectory (Sept 2022) anticipates that the site would be developed over the period 2028/29 to 2037/38 and so does not form part of the Five-Year Housing Supply.
20. The removal of site F3.1 from the submitted Plan would still result in a sufficient supply of housing over the Plan periods being considered as set out in the table below:

Plan Period	Local Housing Needs	Net Gain
2016-2036	11,260	13,313
2016-2038/39	12,949	14,700
2021-2038/39	10,278	12,524

### Spatial Strategy/Settlement Hierarchy

21. The removal of site F3.1 from the submitted Plan has a positive effect on the Spatial Strategy as the proposals now distribute a higher proportion of growth at the most sustainable locations relative to the Borough Council of King's Lynn and West Norfolk with 73% of development taking place within the A10/Main Rail Line Strategic Growth Corridor. The wider geographical impact is negligible provided Fenland District Council are able to meet their housing need which their Regulation 18 draft plan suggests is possible.
22. The table below shows the revised housing distribution should Site F3.1 be withdrawn, the development within the A10/Main Rail Line Strategic Growth Corridor (highlighted) and provides a comparison to the previous housing distribution %.

Place	Homes Allocation No.	Homes Allocation %	Previous Homes Allocations%
<b>King's Lynn &amp; Surrounding Area</b>	<b>2,896</b>	<b>62</b>	<b>55</b>
King's Lynn	827	18	16
West Lynn	169	4	3
South Wootton	300	6	6
North Wootton	0	0	0
West Winch	1600	34	30
<b>Main Towns</b>	<b>783</b>	<b>16</b>	<b>24</b>
Downham Market	390	8	7
Hunstanton	393	8	7
Wisbech Fringe	0	0	10
<b>Growth Key Rural Service Centres</b>	<b>117</b>	<b>3</b>	<b>3</b>
Watlington	32	1	1
Marham	85	2	2
<b>KRSC</b>	<b>764</b>	<b>16</b>	<b>15</b>
<b>Rural Villages</b>	<b>148</b>	<b>3</b>	<b>3</b>
<b>SVAH</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>4708</b>	<b>100</b>	<b>100</b>

## Conclusion

23. As set out in this Position Statement it is considered that retaining all or part of the allocation of F3.1 would not result in a sustainable development in its own right and is only sustainable as part of the larger comprehensive development and dependent on the improvements to the A47 to deal with traffic impacts.