
Examination Hearing Statement Matter 5: Settlements and Sites

King's Lynn and West Norfolk Local Plan Review

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1. Introduction

- 1.1. This Statement has been prepared by Savills (UK) Limited on behalf of the Holkham Estate.

Background and Scope of this Hearing Statement

- 1.2. The Holkham Estate has a number of important land owning interests across the Borough Council's administrative area and as such the Estate has engaged throughout the Local Plan Review process.
- 1.3. King's Lynn and West Norfolk Borough Council initially identified land on the east side of Creake Road, Burnham Market for residential allocation in the Regulation 18 version of the Local Plan, formal representations were made in support of the draft allocation. However, in the Regulation 19 version of the Local Plan the Borough Council omitted the draft residential allocation, duly made representations setting out objections to the Borough Council's proposal were submitted and the site was proposed as an omission.
- 1.4. Following the submission of the Local Plan Review for Examination, the Borough Council held a 'Post Submission Sustainability Appraisal Consultation' duly made representations were submitted on behalf of the Holkham Estate.
- 1.5. Post submission of the Local Plan for Examination, as identified in Examination Document F21 'The Schedule of Suggested Main Modifications' dated October 2022, the Borough Council has now proposed to delete text at paragraphs 12.2 to 12.2.5 which makes reference to Burnham Market being classified as a Key Rural Service Centre and reference to the emerging Neighbourhood Plan however it is understood that Burnham Market is still proposed to be classified as a 'Key Service Centre'.

The Issue / Sub-Issues

- 1.6. In relation to Matter 5, the Inspectors have identified the following single issue: *'Issue 5: Are the proposed settlement and site allocations policies justified, taking into account the reasonable alternatives, and are they positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?'*
- 1.7. Under the main issue the Inspectors have then identified a series of sub-issues (identified in bold in the 'Matters, Issues and Questions' and then questions. This Statement is formatted in that manner.

2. Site Allocation Policies

147. Are the site allocation policies throughout the Plan justified and effective where they require:

- a) Safe access to be ‘to the satisfaction of the local highway authority’ rather than in line with national and local planning policies?**
- b) Sewer and odour mitigation to be provided ‘to the satisfaction of Anglian Water’ rather than in line with national and local policies?**
- c) The provision of affordable housing to be in line with ‘current standards’ or ‘the standards at the time’ rather than those specified in Policy LP28 of the Plan?**

- 2.1. In response to a) and b), the proposed Local Plan policies should make reference to the requirements of the National Planning Policy Framework, Planning Practice Guidance and local policies rather than a specific body.
- 2.2. In response to c), the provision of affordable housing should cross refer to the standards specified in the proposed Local Plan Policy LP28.

3. Key Rural Service Centres

- 3.1. **187. Are the proposed housing allocations in the Key Rural Service Centres justified, effective and consistent with national policy, with particular regard to:**
- a) the effect of the development on landscape character, heritage, biodiversity, agricultural land, flood risk, highway safety, infrastructure and facilities;**
 - b) the relationship of the site to the existing settlement and its accessibility to local services and facilities;**
 - c) the evidence to support the site's 'deliverability' and/or 'developability', as defined in Annex 2 of the NPPF, and set out on the housing trajectory; and,**
 - d) its viability, having regard to the provision of any infrastructure, affordable housing and other policy requirements?**
- 3.2. The Holkham Estate maintains its objection to the removal of draft allocation site 'Policy BM1– land south of Joan Short's Lane and east of Creake Road, Burnham Market' which was identified in the Regulation 18 Local Plan which made provision for 29 dwellings, including the provision of 6 affordable dwellings. It is clear that the allocation of this site would deliver much needed affordable housing at a sustainable rural location.
- 3.3. The inclusion of the site within the Regulation 18 Local Plan confirmed the local planning authority's acceptance of the principle of development in this location. Nothing has changed to suggest that such a principle has changed. The land in question remains positioned on the edge of the built up area at Burnham Market and obviously remains located within the planning policy area subject to designations, including the Special Protection Area and the Area of Outstanding Natural Beauty (AONB). There has not been any explanation as to why no residential allocations are being directed to Burnham Market with exception of general reference to overall reduction in housing need across the Borough.
- 3.4. The draft allocation Policy BM1 also made provision for a GP surgery. A subsequent planning application (LPA reference: 19/01239/F) was granted on 18th July 2019 for the "*Construction of new GP surgery with dementia suite, access road, car park and an area of land to facilitate the clinical needs as set down by the CCG*". The GP surgery is now under construction. As a result of this development the immediate landscape context of the site has changed, with proposal to direct residential development to the south of the new GP Surgery and between the surgery and the farm buildings on the eastern side of Creake Road.
- 3.5. Representations made in response to the Regulation 19 Local Plan Consultation (**Appendix 2**) demonstrate the proximity of the site to key facilities at the settlement. Appropriate consideration has been given to the technical considerations including access, landscape, heritage, biodiversity, flood risk, and drainage in the preparation of a proposed site layout. The site is considered to be deliverable within the first five years of the of the plan period.
- 3.6. The Regulation 19 representations also quoted the proposed policy wording for Policy BM1 as identified in the Regulation 18 Local Plan, it is acknowledged that minor alterations to the text would be required to make the Local Plan effective. Suggested alterations

3.7. ~~"Land amounting to 2.7 hectares~~ 2.1 as shown on the Policies Map, is allocated for residential development of at least 29 dwellings. ~~and the provision of a GP doctor's surgery with car park on a minimum of 0.7 hectares.~~ Development will be subject to compliance with all of the following

1. Safe access being achieved *in accordance with national and local planning policies*; ~~to the satisfaction of Norfolk County Council as the local highway authority~~

2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of this development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.

3. The site may be affected by contamination from a previous use. Responsibility for securing a safe development rests with the developer and/or land owner. The planning application for the site will need to include an assessment to ensure that the site can be made suitable for its proposed use. Adequate site investigation information prepared by a competent person, will be required to inform this assessment.

4. A programme of publicly aimed at occupants of the development and other residents in Burnham Market highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area. This will highlight the sensitivity of those protected areas to dog walking and other recreation.

5. The existing barn style residential dwellings to be retained

6. The design of development, and in particular its mass and materials, should have regard to its potential impact on the setting of Burnham Market Conservation Area and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

7. Incorporation of a high quality landscaping scheme to the eastern boundary to minimise the impact of the development on the wider countryside.

8. Provision of affordable housing in line with *Local Plan Policy LP28* ~~the current standards."~~

188. This section of the Plan contains an Inset Map for each settlement, which the Council has confirmed form part of the Policies Map. In order to be clear that this is the case and for the Plan to be effective, should these Inset Maps be removed from the Plan and included as part of the Policies Map, as proposed in the Council's suggested Main Modifications?

3.8. Yes, a single Policies Map would ensure accuracy and would enable the Local Plan to be effective.

189. Should the supporting text to the Plan include a plan following each policy which indicates the extent of allocated sites within each Key Rural Service Centre in order to be effective, as proposed in the Council's suggested Main Modifications?

3.9. Yes, identification of the extent of the site allocation, as proposed in Examination Document F21, would enable the Local Plan to be effective.

190. Is reference to the Site Allocations and Development Management Policies Plan (2016) in the supporting text to Policies within this section of the Plan justified and effective or should it be removed as proposed by the Council in its suggested Main Modifications, in order for the Plan to be sound?

- 3.10. Yes, reference to the Site Allocations and Development Management Policies Plan (2016) should be removed. The Local Plan Review should reflect the current position and it should be informed by the Local Plan Review supporting evidence base.

4. Burnham Market

192. Is the inclusion of a description of the Burnham Market Key Service Centre and update on the progress of the Neighbourhood Plan in the Plan effective and justified, given that there is no policy allocating any sites for housing or other uses?

- 4.1. As set out at Examination Document F21 'The Schedule of Suggested Main Modifications' dated October 2022, the Borough Council has now proposed to delete text at paragraphs 12.2 to 12.2.5.
- 4.2. The Local Plan as submitted is not effective in so far as it is silent regarding housing delivery at Burnham Market. The description of the settlement and reference to the emerging Neighbourhood Plan are useful context but do not provide a policy basis to enable development to be delivered over the plan period. The text is therefore not effective.
- 4.3. The Local Plan does not propose to make any allocations at Burnham Market, this is despite the Regulation 18 Local Plan identifying a site for the delivery of a new GP/ medical centre and some 29 residential dwellings. There has been no explanation as to why the site has been omitted from the emerging Local Plan other than reference to a reduced housing requirement across the plan period.
- 4.4. There is no specific justification for the proposed do nothing approach at Burnham Market despite it being a fourth tier settlement within the settlement hierarchy.

193. The Council has put forward a suggested Main Modification to delete the section of the Plan relating to the Burnham Market Key Rural Service Centre. Is this change necessary to ensure that the Plan is sound?

- 4.5. It is understood that Burnham Market is still proposed to be classified as a 'Key Rural Service Centre' under Policy LP02.
- 4.6. It is understood that LP01 and LP02 are proposed to be changed under further amendments. We reserve the ability to comment in response to additional information being prepared by the Council at the appropriate time.

194. Is the Plan effective in respect of the approach to the issues within Burnham Market Key Rural Service Centre?

- 4.7. No.
- 4.8. Policy LP41 – Development in Rural Areas identifies that *"the strategy for rural areas is to... the focus of most new development in the rural areas will be at Growth Key Rural Centres and Key Rural Service Centres selected from the Settlement Hierarchy Policy LP02."* (It is understood that modifications are to be made to LP02 but it is understood the text for Policy 41 remains unchanged to date).
- 4.9. The emerging Local Plan does not propose to make any site allocations at Burnham Market despite the Regulation 18 Local Plan proposing site 'BM1' Land at Joan Short Lane for allocation for some 29 dwellings, of which would include the delivery of 6 affordable dwellings. As a consequence the Council is reliant upon windfall delivery across the entire plan period. It is considered very unlikely that any affordable housing delivery will occur within Burnham Market across the plan period.

- 4.10. The Housing Trajectory (October 2022) (Examination Document F22) anticipates housing delivery at Burnham Market. The Council anticipates the delivery of 59 dwellings at Burnham Market. However this is considered to be an over estimate. Analysis is provided at **Appendix 1**.
- As a result of the alteration to the plan period there is a reduction of 1 dwelling (LPA Ref: 15/01386/F) as this appears to have been started and completed in 2020/21.
 - There are further reductions in respect of 'Tern Cottage 46 - 48 North Street' (LPA Ref: 21/00861/F) application relates to conversion of outbuilding for use by existing dwelling so there is no net additional dwelling.
 - Various applications at the Fisher & Sons North Street site but latest permission relates to 5 net dwellings only as opposed to 7 as stated in the trajectory (LPA Ref: 19/00400/F).
- 4.11. It is important to note that none of the sites within the housing trajectory include the provision of any onsite affordable housing delivery within Burnham Market. Only one application reaches the trigger for affordable housing and the S106 has secured payment for a commuted sum equivalent to 1.8 affordable dwellings. Submissions have been made as part of the Regulation 19 response to identify key findings about local housing need within Burnham Market and surrounding settlements.
- 4.12. Whilst it is acknowledged that 'Policy LP28 – Affordable Housing' does make provision for exception sites '*in suitable locations*' it is considered unlikely that this policy will facilitate delivery at Burnham Market.
- 4.13. It is also noted that 'Policy LP31 - Residential Development Reasonably Related to Existing Settlements' does not apply within the Norfolk Coast Area of Outstanding Natural Beauty and therefore no housing will be able to come forward under this policy.
- 4.14. At present the Local Plan is also silent about the amount of housing that would be acceptable at Burnham Market as a Key Rural Service Centre, although it is noted that further modifications are anticipated to be proposed to Policy LP01 and LP02. We reserve the ability to comment in response to additional information being prepared by the Council at the appropriate time.

Appendices

Appendix 1

Updated Housing Trajectory with Savills Commentary

Parish	PP Ref	Date of Permission	Site Address	Description	No. of Units Permitted	Net Gain	Status	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	KLWN - Net Gain (Within plan period 2021-2038)	Savills Assessment of Net Gain (Within Plan period 2021-2038)	Savills Notes
Burnham Market	19/00400/F	02-May-19	Fisher & Sons North Street	Variation of condition 2 of planning permission 16/01797/F	7	7	Not Yet Started								3	4															7	5	No affordable housing. Permission to be started by 17th August 2020. This trajectory states that the development has not yet started. Various applications at the site but latest permission relates to 5 net dwellings only. A current enforcement case is pending at the site.
Burnham Market	19/00542/F	12-Jun-19	Jack Wills 16 Market Place	change of use of the upper floors to a self-contained flat.	1	1	Not Yet Started							1																	1	1	No affordale housing. Permission now lapsed.
Burnham Market	20/00929/F	02-Sep-20	Cradle Hall Farm Docking Road B	Conversion of existing farm buildings into 5 residential dwellings	5	5	Not Yet Started								2	3															5	5	No affordable housing as proposal is for a conversion. DN - 2 September 2020.
Burnham Market	21/00821/PACU1	08-Jun-21	Bruce And Co Accountants 4 Ulph Place	Application to determine if prior approval is required for proposed change of use from office to dwelling (Schedule 2, Part 3, Class O)	1	1	Not Yet Started								1																1	1	No affordable housing. DN - 8th June 2021.
Burnham Market	21/00861/F	28-Feb-22	Tern Cottage 46 - 48 North Street	Demolish and re-build single storey, detached, garden outbuilding as ancillary accommodation to main dwelling (revised scheme)	1	1	Not Yet Started									1															1	0	No affordable housing. DN - 4th May 2021. No net new dwelling. Application relates to conversion of outbuilding for use by existing dwelling.
Burnham market	20/01792/F	16-Jul-21	East of The Chalet Priory Chase	Construction of five dwellings and garages	5	5	Not Yet Started									5															5	5	No affordable housing. DN - 16 July 2021.

Burnham Market	20/01866/F	15-Oct-21	Land North West of 40 Sutton Estate	Residential development of 9 no. dwellings.	9	9	Not Yet Started																								9	9	No onsite affordable housing. Contribution secured via S106 for £108,000 (relating to 1.8 units). S106 dated 25th May 2021.
Burnham Market	21/01957/F	07-Mar-22	Doctors Surgery Church Walk	Demolition of GP Surgery and erection of 4no. dwellings	4	4	Not Yet Started																								4	4	No affordable housing. DN - 7 March 2022.
Burnham Market	21/02121/F	25-Mar-22	25 Front Street	Variation of condition 2 of planning permission 17/02079/F to amend drawings	1	1	Not Yet Started																								1	1	No affordable housing. Application for construction of a dwelling and car port. DN - 25 March 2022.
Burnham Market	18/00966/F	11-Jul-18	Croftwood Station Road	Change of Use from Outbuilding to Dwelling including alterations and extension	1	1	Started							1																	1	1	No affordable housing.
Burnham Market	15/01386/F	12-Nov-15	Agricultural Barn Beacon Hill Road	Proposed conversion of the existing barn to residential use and additional outbuilding	1	1	Started						1																		1	0	No affordable housing. No new net dwellings as assumed now completed.
Burnham Market	18/01415/F	31-Jan-19	Gallow Hill Farm Stanhoe Road	Conversion of barns to two dwellings and extension of existing farmhouse	2	2	Started																								2	2	No affordable housing as proposal is for a conversion. DN - 30 January 2019.
Burnham Market	19/01731/F	10-Jun-20	Church Pightle Station Road	Demolition of detached bungalow and erection of 3 x 2-storey dwellings and 1 x garage	3	2	Started																								2	2	No affordable housing.
Burnham Market	19/02109/F	10-Jul-20	Cherry Trees Church Walk	Demolition of an existing dwelling and replacement with a pair of link detached dwelling and associated external works	2	1	Started																								1	1	No affordable housing.
Burnham Market	21/00429/F	20-May-21	Goosebec Church Walk	Variation of Condon 1 of Planning Permission 20/01680/F: Demolition of existing dwelling and erection of five dwellings (Revision Of 20/00744/F)	5	4	Started																								4	4	No affordable housing. DN - 11 September 2020

Burnham Market	20/00904/F	04-Sep-20	Sussex Farm Ringstead Road	Proposed conversion of barns to 9 No residential dwellings	9	9	Started							4	5																9	9	No affordable housing as proposal is for a conversion. DN - 4th September 2020.
Burnham Market	21/00084/F	24-Sep-21	Redlands Back Lane	Development of 6 dwellings following demolition of existing dwelling	6	5	Started							2	3																5	5	No affordable housing. DN - 24th September 2021
					63	59						1	1	10	15	23	9	0											59	55			

Appendix 2

Regulation 19 Local Plan Consultation Response

12.2 – Burnham Market – Omission of Allocation

Objection

Savills (UK) Ltd are instructed by Holkham Estate to make necessary and relevant representations to the Council's Local Plan Review pre-submission stage 2021. The Estate has a number of important land owning interests across the Borough Council's administrative area and it is entirely appropriate in such a context to make submissions to relevant emerging planning policy guidance.

Overview

This representation to the Council's Regulation 19 version of the Local Plan constitutes an objection to that document in the circumstances that the Council has failed to allocate a residential site on the east side of Creak Road, Burnham Market.

The site was previously identified as an allocation in the Regulation 18 version of the Local Plan and we consider that there are sound reasons as to why the land should be allocated in the Regulation 19 version. It is thus regarded as an omission to the plan and this is a formal objection.

The representation is referenced to Section 12.2 of the Local Plan which is that extract relating to Burnham Market. It is considered that it is this part of the Local Plan that is the subject of this specific objection. Separate representations have been made to other policies in the plan on behalf of the Holkham Estate.

Context

Holkham Estate owns land on the east side of Creak Road, Burnham Market and has made representations throughout the Local Plan process at the relevant time, to promote the allocation of 2.7 hectares of land for at least 29 dwellings and a GP surgery. The land was allocated in the Regulation 18 version of the Local Plan published in 2019 where Policy BM1– land south of Joan Short's Lane and east of Creak Road, Burnham Market stated

"Land amounting to 2.7 hectares as shown on the Policies Map, is allocated for residential development of at least 29 dwellings and the provision of a GP doctor's surgery with car park on a minimum of 0.7 hectares.

Development will be subject to compliance with all of the following

- 1. Safe access being achieved to the satisfaction of Norfolk County Council as the local highway authority*
- 2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of this development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.*
- 3. The site may be affected by contamination from a previous use. Responsibility for securing a safe development rests with the developer and/or land owner. The planning application for the site will need to include an assessment to ensure that the site can*

be made suitable for its proposed use. Adequate site investigation information prepared by a competent person, will be required to inform this assessment.

- 4. A programme of publicly aimed at occupants of the development and other residents in Burnham Market highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area. This will highlight the sensitivity of those protected areas to dog walking and other recreation*
- 5. The existing barn style residential dwellings to be retained*
- 6. The design of development, and in particular its mass and materials, should have regard to its potential impact on the setting of Burnham Market Conservation Area and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty*
- 7. Incorporation of a high quality landscaping scheme to the eastern boundary to minimise the impact of the development on the wider countryside*
- 8. Provision of affordable housing in line with the current standards”*

A copy of the extract of the Regulation 18 version of the Local Plan is enclosed at **Appendix 1** to this submission.

The inclusion of the site at the time confirmed the local planning authority's acceptance of the principle of development in this location. Nothing has changed to suggest that such a principle has changed. The land in question remains positioned on the edge of the built up area at Burnham Market and obviously remains located within the planning policy area subject to designations, including the Special Protection Area and the Area of Outstanding Natural Beauty (AONB).

The Council's own "Draft Sustainability Appraisal (SA) Incorporating Strategic Environmental Assessment (SEA) for the draft Local Plan review" was published in January 2019 to support the Regulation 18 version of the Local Plan. The details of the appraisal as it was undertaken to assess the then allocation (site H026) is enclosed at **Appendix 2** to this representation . The commentary supporting the assessment of H026 states :

“H026 (28-11-20169551) – The site is located relatively central to the village. The site is situated on the eastern side of Creake Road, to the south of Joan Short's Lane. To the south and west is existing development along Creake Road, mainly comprising housing but there is a petrol station/garage with some shops. This location ensures a positive score for 'access to services' as most of the services and facilities on offer at Burnham Market are only a short distance away. The score for 'community and social' is highly positive as the site has the potential to provide a new Doctor's Surgery for the local area. The promoters of the site state that NHS West Norfolk Clinical Commissioning Group have announced a specific funding stream to facilitate the delivery of the new GP Surgery at this site, this would likely mean the existing GP Surgery would close. The site could also provide a number of affordable housing units in area of known high values. Development of this site is likely to have a neutral impact with regard to 'economy b' as although the site is within current agricultural use the site is classed as grade 4 agricultural land. Part of the site is fields and the other part is a mixture of buildings/structure including barns and a couple of dwellings mainly related to agriculture some parts are clearly developed and a portion could be classed as brownfield. The removal of this from a central area of the village, although a rural area, could be seen as a benefit. Likewise the score with regard to 'economy a' is considered to be neutral as whilst clearly a new surgery would create jobs, this would be offset somewhat by the closure of existing health facility, therefore any increase in employment is likely to be marginal. The site is with Flood Zone 1 and therefore is awarded a positive score. In terms of access NCC as the local highway authority consider that there are potential constraints but these could be overcome through

development and it is believed that any potential impact on the functioning of local road network could be reasonably mitigated. The Conservation Area is located to north and west of the site, and the centre of Burnham Market contains a number of listed buildings, these and their settings will need to be taken into careful consideration in the design of any scheme. Likewise the wider landscape will need to be considered as the site and indeed the village is wholly within the AONB. Part of this site was subject to a preapplication for a GP Surgery in 2017, this was determined as likely to refuse as it was considered at that time that the scale of the buildings proposed was unacceptable. Clearly any scheme should reflect the site and its context. Specifically in relation to the historic and natural environment.”

The commentary went on to conclude that *“Site H026 also scored positively overall and has the potential to deliver a new health care facility for the village and wider area, this facility may also have the potential for future expansion. The promoters of the site have put forward this proposal which also includes the provision of 29 dwellings, whilst this is clearly more dwellings than sought this could still be appropriate as other Key Rural Service Centres may not be able to meet the need identified for them and Burnham Market has been identified as a highly sustainable location, and the addition of a new health facility is considered to be a positive opportunity”.*

After careful consideration and on balance it is considered appropriate to propose Site H026 for allocation for the provision of a new GP Surgery and 29 dwellings. The promoters have suggested this level of housing and the Borough Council considers this to be an appropriate number given the site and the context.”

Clearly at that point of time the Council were supportive of the allocation and we consider that the site should be retained as an allocation with the Local Plan. The site remains well related to the built up area of the village which is a settlement identified with Policy LP02 “Settlement Hierarchy “as a Key Rural Service Village and where Policy LP01 states there should be a focus for new development.

In reviewing the sequence of events since the Regulation 18 version was published in 2019, it is difficult to follow the decision which came about to remove the allocation from the Local Plan. We have seen a recording of the Council’s Local Plan Task Group on the 4th November 2000 where the Council’s Policy officer confirmed the reasoning behind the removal of the allocation was purely based on need. No other reason was given for its deletion. He stated

“... there is no need for us to make any other allocations at Burnham Market ... [the site] was our preferred option at draft local plan stage, but to do with our housing numbers, we don’t need it so we’re not proposing it ...”

We would confirm that a separate representation by way of an objection is made to Policy LP01 as it relates to the Councils assertions regarding their “Housing Requirement calculation”. It is our view that the plan period should be extended by a further year (ie to 2037) in the light of NPPF guidance which says that Local Plans should have 15 years remaining post adoption. Having regard to this extra year and the need to apply a 10% buffer to support economic growth and to have a buffer to ensure deliverability, it is considered that the real housing requirement for the Council in the Plan is 12,635 dwellings rather than the 10,780 to be planned for.

In the circumstances where more sites are needed having regard to the above, in addition to any other planning considerations that may be relevant, our client's land at Burnham Market should be re-allocated within the Local Plan.

As stated above, the element that has changed from the Regulation 18 version published in 2019 is the granting of permission for a new GP surgery – planning application reference 19/01239/F was granted on 18 July 2019 for the “Construction of new GP surgery with dementia suite, access road, car park and an area of land to facilitate the clinical needs as set down by the CCG.” The approved site plan is enclosed as **Appendix 3** to this representation.

In supporting the submitted application, the Council's Policy Team acknowledged the importance of community facilities and services/infrastructure to improve people's quality of life and suggested that the provision of a new GP surgery would most likely meet the current and future needs of the local population and projected changing demographic in terms of health requirements. The officers acknowledged that the site lay outside of the development boundary for Burnham Market but accepted at the time that Policy DM2 of the adopted plan provided the opportunity to permit community facilities as a particular type of development outside of development boundaries. They noted that the site lies within the Norfolk Coast Area of Outstanding Natural Beauty (AONB) and were comfortable that support would be given on balance for this proposal.

The granting of the permission and the construction that has commenced in accordance with the approved plans now means that the land originally proposed for allocation in the 2019 version of the plan will now be reduced accordingly to focus on the residential element for at least 29 dwellings are still being proposed. A Vision Statement has been prepared on behalf of the Holkham Estate and is submitted as part of this representation and identifies that area for the proposed housing allocation. (See **Appendix 4**) The granting of consent for the GP surgery in this location within the AONB has changed the immediate landscape and now compromises that land currently open between the surgery and the farm buildings on the eastern side of Creake Road.

The design and layout within the Vision Document represents a suggested layout where 29 dwellings would be delivered on a 2.1 hectare site. In the circumstances where the Council had previously allocated this land for development, then there remains sound reasons why it should remain identified for development.

A concept masterplan within the Vision Statement proposes a design and layout to accommodate at least 29 dwellings on that land south of Joan Short's Lane and south of that area of land that has the benefit of planning permission for the GP Surgery and which is now under construction. In building up the design principles it has been critical to identify a safe and walkable neighbourhood which feels part of the village's character and fabric whilst at the same time ensuring that there is a satisfactory relationship with surrounding land and buildings. Consequently the masterplan shows a strong relationship with Creake Road to include new dwellings as well as the proposed conversion of a number of the existing farm buildings . Within the centre of the site is a new large open space together with a new square in the southern part of the site. The boundary is formed by a strong landscaped edge which reflects the importance of the sensitivity of the landscape within the AONB and the importance of creating net biodiversity gain as part of this development.

It is important to stress that the Vision Statement only presents one suggested layout and has been submitted to confirm the ability of the site to accommodate development having regard to the relationship to the village and the sensitivities of the surrounding landscape

In such a context, the indicative scheme as put forward within the Vision Document is only one way of setting out a deliverable scheme which not only delivers the market housing but also affordable housing consistent with emerging policy. There is no doubt that housing demand exists within Burnham Market and in this context the Estate commissioned Housing Vision Limited to undertake a postal survey of the need for suitable housing circulated to all residential households in the parishes of Brancaster, Burnham Market, Burnham Norton, Burnham Overy, Burnham Thorpe, Docking, North Creake, South Creake and Stanhoe in April 2021. These nine parishes have been referred to within the Housing Vision Ltd document as the “Burnham Market area”. The survey listed a number of salient questions as it related to housing need and reflected the case that there is a need within Burnham Market and the contribution that our site could make to providing new affordable housing as well as market housing should not be underestimated in such a context.

A summary of the report is enclosed at **Appendix 5** to this representation.

Conclusion

Holkham Estate is strongly of the view that the residential element of an allocation identified within the Regulation 18 version of the Local Plan published in 2019 should be reinstated as an allocation in the Local Plan.

The Council’s only reason for excluding the site was on the basis of need and in the circumstances there is a chronic need for new affordable housing within the Borough as well as in Burnham Market itself, there are sufficient planning policy reasons as to why this omission within the Plan can be addressed.

Accordingly we consider that the text within section 12.2 of the Local Plan should be amended to read “

“Land amounting to 2.1 hectares as shown on the Policies Map, is allocated for residential development of at least 29 dwellings and open space.

Development will be subject to compliance with all of the following

- **Safe access being achieved to the satisfaction of Norfolk County Council as the local highway authority**
- **Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of this development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission.**
- **The site may be affected by contamination from a previous use. Responsibility for securing a safe development rests with the developer and/or land owner. The planning application for the site will need to include an assessment to ensure that the site can be made suitable for its proposed use. Adequate site investigation information prepared by a competent person, will be required to inform this assessment.**
- **A programme of publicly aimed at occupants of the development and other residents in Burnham Market highlighting the opportunities for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area. This will**

highlight the sensitivity of those protected areas to dog walking and other recreation

- The existing barn style residential dwellings to be retained
- The design of development, and in particular its mass and materials, should have regard to its potential impact on the setting of Burnham Market Conservation Area and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty
- Incorporation of a high quality landscaping scheme to the eastern boundary to minimise the impact of the development on the wider countryside
- Provision of affordable housing in line with the current standards”

The supporting text should read (and re-numbered where appropriate)

“Site Description and Justification

12.2.1.2 The village of Burnham Market is one which is located wholly within the Norfolk Coast AONB, and has a rich historic built environment with the Burnham Market Conservation Area covering a significant portion of the settlement, as well as a large number of listed buildings within this. This landscape setting and rich heritage offer is a challenge to any future growth of the village. Any growth needs to ensure that the integrity of the village is maintained. The design of any development and in particular its massing and materials will most likely need to have regard to any potential impact upon the Burnham Market Conservation Area, its setting, and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

12.2.1.3 The allocation site has scored well in the Sustainability Appraisal. The amount of housing involved is greater than would normally be considered appropriate within the Area of Outstanding Natural Beauty (AONB). However, this is an exceptional circumstance where the construction of a new GP doctor’s surgery for the local community on the adjacent, justifies the increase in the level of development proposed in this case..

12.2.1.4 The development boundary is immediately to the west and the south; in fact part of the site is within the development boundary.

12.2.1.5 The site will provide a number of affordable housing units in area of known high values. The existing barn style residential dwellings are to be retained as these are considered to make a positive contribution to character of the area and the street scene.

12.2.1.6 The site partly comprises fields, classed as grade 4 agricultural land, and the other part is a mixture of buildings/structure including barns and a couple of dwellings mainly related to agriculture some parts are clearly developed and a portion could be classed as brownfield. The removal of this from a central area of the village, although a rural area, could be seen as a benefit.

12.2.1.7 The Conservation Area is located to north and west of the site, and the centre of Burnham Market contains a number of listed buildings, these and their settings will need to be taken into careful consideration in the design of any scheme. Likewise the wider landscape will need to be considered as the site and indeed the village is wholly within the AONB. Apart from the hedgerows there are no other landscape features of importance within the site boundary.

12.2.1.8 The Plan's Habitats Regulations Assessment Report identified the need for a programme of publicity measure, as set out in the policy, to ensure no adverse impact on the nearby designated nature conservation area through exacerbation of existing adverse recreational impacts.

12.2.1.9 Given the sites agricultural use, there is the potential for contamination and accordingly the policy above includes an item relating to this.

12.2.1.10 The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SUDS) would be sought to serve new development.

12.2.1.11 In terms of access, Norfolk County Council as the Local Highway Authority consider that there are potential constraints but these could be overcome through development and it is believed that any potential impact on the functioning of local road network could be reasonably mitigated.

12.2.1.12 The majority of views of the site are limited to the near distance from adjacent roads, properties and public rights of way. Medium and long distance views from the wider landscape are possible, in these views the site could be seen in the context of the existing village.”

12.2 Burnham Market

Key Rural Service Centre

Description

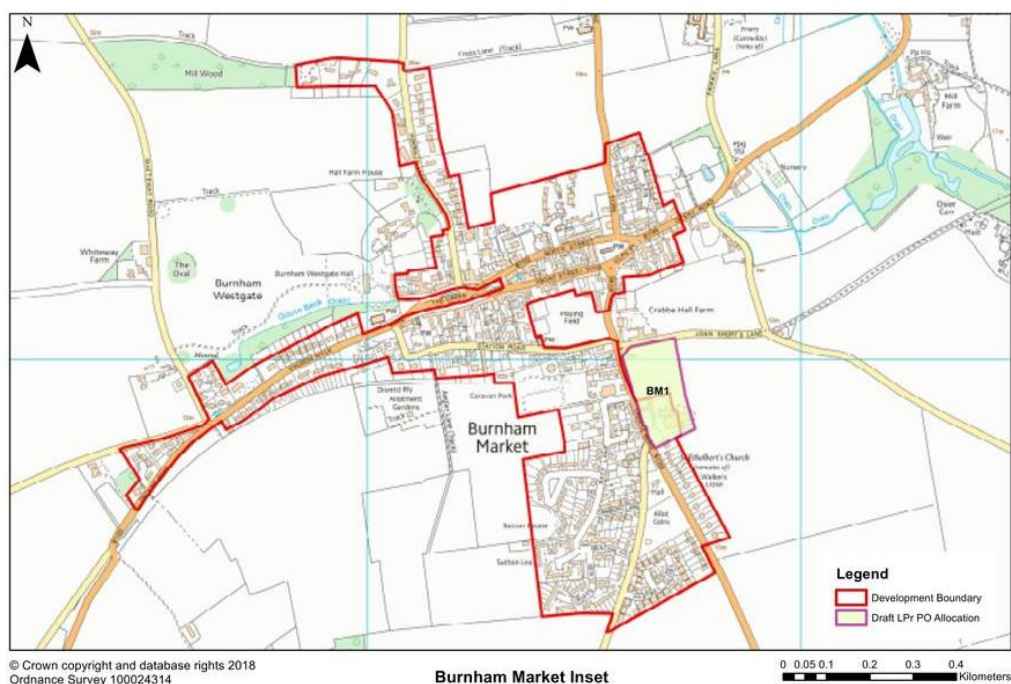
12.2.1 Burnham Market is situated close to the coast within the Norfolk Coast Area of Outstanding Natural Beauty and has a traditional village form consisting of a high street occupied by small independent retailers and a pub fronting the village green. Built character within the village comprises a mixture of colour-washed buildings, interspersed with brick, which provide strong definition to the streets. There is a high concentration of Listed Buildings surrounding the village green which is part of the Conservation Area.

12.2.2 The parish of Burnham Market has a population of 877⁽¹⁹⁾ As with the surrounding coastal villages, the area has long been popular with local people, retirees, and tourists which has led to limited affordability of the local housing stock. Burnham Market is one of few rural settlements which does not suffer from declining services, managing to retain and attract small businesses and therefore provide a sustainable service offer to surrounding villages and hamlets. Burnham Market is connected to coastal villages via the Coast-hopper bus route along the A149 which interchanges in Hunstanton and Wells-next-the-Sea.

12.2.3 The village is in a scenic location within the Area of Outstanding Natural Beauty and the central part of the village is designated a Conservation Area. In assessing sites for development the Council have considered the potential impact of development on the rural and historic character of the village and surrounding scenic countryside.

12.2.4 The Site Allocations and Development Management Policies Plan (2016) made an allocation for land amounting to 2.7 hectares for a development of at least 32 dwellings and a 1.2 hectare public car park, along with associated landscaping and public toilets. This site came forward, gained planning permission (13/01810/FM) and the development is now complete. Accordingly the allocation has been removed from the Policies Map and the completed site is now included within the development boundary for Burnham Market

12.2.5 Looking ahead to 2036 based on the Borough Council's preferred method of distributing new development Burnham Market would receive an allocation of 5 new homes. However, one of the sites proposed could potentially deliver an exceptional benefit to the village by providing a new a GP doctor's surgery if the level of housing allocation was increased to 29 new homes. The Borough Council considers this is a rather unique opportunity and one worthy of exploration.



12.2.1 BM1 - Burnham Market Land south of Joan Short's Lane and east of Creak Road

Site Allocation

12.2.1.1 The site is located relatively central to the village and is a short distance from the centre. To the north, west, and south of the site is existing development along Creake Road, mainly comprising housing but there is a petrol station/garage with some shops

Policy Draft Policy BM1 - Land south of Joan Short's Lane and east of Creake Road, Burnham Market

Land amounting to 2.7 hectares, as shown on the Policies Map, is allocated for residential development of at least 29 dwellings and the provision of a GP Doctor's Surgery with car park on a minimum of 0.7 hectares.

Development will be subject to compliance with all of the following:

1. Safe access being achieved to the satisfaction of Norfolk County Council as the Local Highway Authority;
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
3. The site may be affected by contamination from a previous use. The responsibility for securing a safe development rests with the developer and/or landowner. The planning application for the site will need to include an assessment to ensure that the site can be made suitable for its proposed use. Adequate site investigation information, prepared by a competent person, will be required to inform this assessment;
4. A programme of publicity aimed at occupants of the development and other residents in Burnham Market highlighting the opportunities for recreation (especially dog-walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area. This will highlight the sensitivity of those protected areas to dog-walking and other recreation;
5. The existing barn style residential dwellings to be retained;
6. The design of development, and in particular its massing and materials, shall have regard to its potential impact on the setting of Burnham Market Conservation Area and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty;
7. Incorporation of a high quality landscaping scheme to the eastern boundary to minimise the impact of the development on the wider countryside;
8. Provision of affordable housing in line with the current standards.

Site Description and Justification

12.2.1.2 The village of Burnham Market is one which is located wholly within the Norfolk Coast AONB, and has a rich historic built environment with the Burnham Market Conservation Area covering a significant portion of the settlement, as well as a large number of listed buildings within this. This landscape setting and rich heritage offer is a challenge to any future growth of the village. Any growth needs to ensure that the integrity of the village is maintained. The design of any development and in particular its massing and materials will most likely need to have regard to any potential impact upon the Burnham Market Conservation Area, its setting, and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

12.2.1.3 The allocation site scores well in the Sustainability Appraisal. The amount of housing involved is greater than would normally be considered appropriate within the Area of Outstanding Natural Beauty (AONB). However, this is an exceptional circumstance where the Borough Council considers that the benefit of a new GP doctor's surgery to the local community, justifies the increase in the level of development proposed in this case. The promoters of the site state that NHS West Norfolk Clinical Commissioning Group has announced a specific funding stream to facilitate the delivery of the new GP Surgery at this site.

12.2.1.4 The development boundary is immediately to the west and the south; in fact part of the site is within the development boundary.

12.2.1.5 The site could also provide a number of affordable housing units in area of known high values. The existing barn style residential dwellings are to be retained as these are considered to make a positive contribution to character of the area and the street scene.

12.2.1.6 Part of the site is fields, classed as grade 4 agricultural land, and the other part is a mixture of buildings/structure including barns and a couple of dwellings mainly related to agriculture some parts are clearly developed and a portion could be classed as brownfield. The removal of this from a central area of the village, although a rural area, could be seen as a benefit.

12.2.1.7 The Conservation Area is located to north and west of the site, and the centre of Burnham Market contains a number of listed buildings, these and their settings will need to be taken into careful consideration in the design of any scheme. Likewise the wider landscape will need to be considered as the site and indeed the village is wholly within the AONB. Apart from the hedgerows there are no other landscape features of importance within the site boundary.

12.2.1.8 The Plan's Habitats Regulations Assessment Report identified the need for a programme of publicity measure, as set out in the policy, to ensure no adverse impact on the nearby designated nature conservation area through exacerbation of existing adverse recreational impacts.

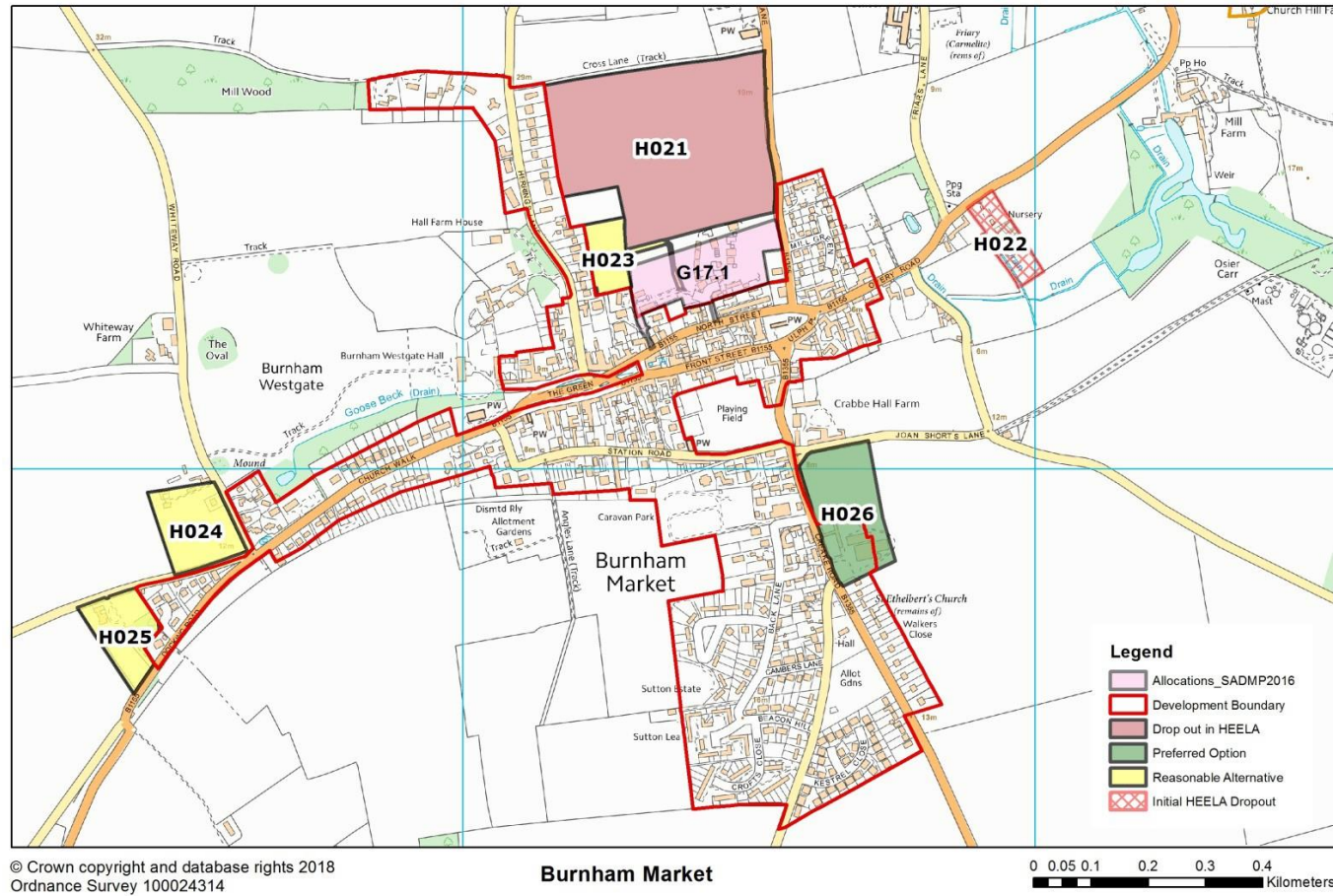
12.2.1.9 Given the sites agricultural use, there is the potential for contamination and accordingly the policy above includes an item relating to this.

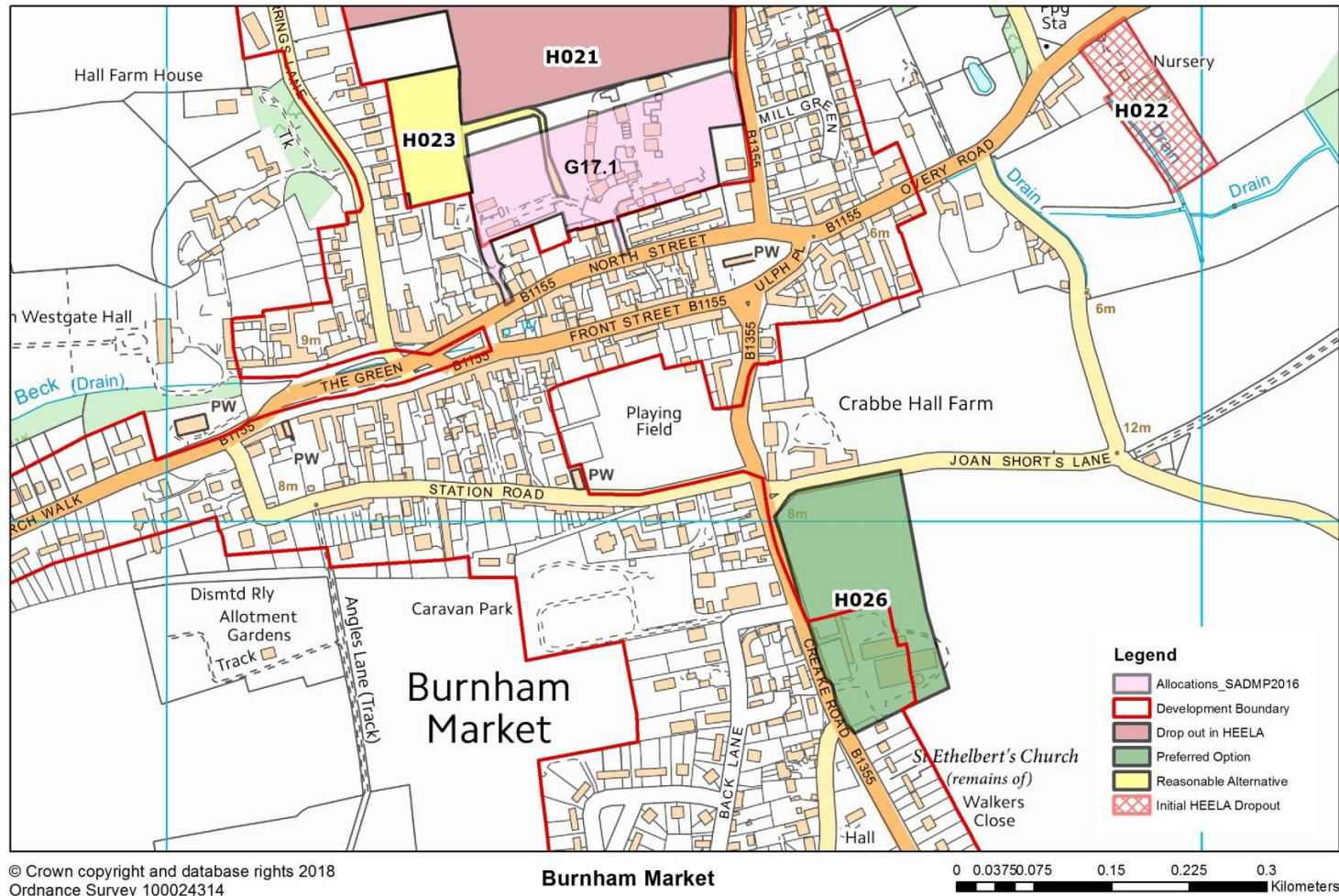
12.2.1.10 The Surface Water Network has been identified as being at capacity meaning a sustainable drainage system (SUDS) would be sought to serve new development.

12.2.1.11 In terms of access, Norfolk County Council as the Local Highway Authority consider that there are potential constraints but these could be overcome through development and it is believed that any potential impact on the functioning of local road network could be reasonably mitigated.

12.2.1.12 The majority of views of the site are limited to the near distance from adjacent roads, properties and public rights of way. Medium and long distance views from the wider landscape are possible, in these views the site could be seen in the context of the existing village.

Burnham Market - Sustainability Appraisal – Site Map





Burnham Market – Sustainability Appraisal – Site Scoring Matrix

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Environment	Infrastructure, Pollution & Waste
H023	++	+	O	O	+	#	#	#	O	x
H024	+	+	O	O	+	#	#	x	#	x
H025	+	+	O	O	+	O	#	x	#	x
H026	++	++	O	O / +	+	x	#	#	#	x

KEY: ++ very positive; + positive; x negative; xx very negative; ~ negligible; o none; # depending on implementation; ? uncertain

Burnham Market - Sustainability Appraisal – Site Commentary

H023 (26-11-20165276) – The Sustainability Appraisal indicates that the site scores highly positive for ‘access to services’ as it is well related to the services and facilities on offer at Burnham Market, being a short distance from the centre. The potential provision of affordable housing in area of known high value property could be a community benefit, hence the positive score in relation to this factor. Development of this site is likely to have a neutral impact with regard to ‘economy a’ and ‘economy b’, as the site is classed as grade 4 agricultural land and it is acknowledged that it is currently vacant and doesn’t appear to be in any specific use. The construction of the development would clearly support the economy but this would be relatively short term and the impact of additional residents on the local economy could be marginal. The site is with Flood Zone 1 and therefore is awarded a positive score. The Burnham Market Conservation Area is located to south and west of the site, and the centre of Burnham Market contains a number of listed buildings, these and their settings will need to be taken into careful consideration in the design of any scheme. In terms of access NCC as the local highway authority consider that there are potential constraints but these could be overcome through development, with a maximum number of 8 dwellings being provided. It is believed that any potential impact on the functioning of the local road network could be reasonably mitigated. Access is proposed through the SADMP allocation which has already been built out and comprises housing, some commercial uses and a large car park; it is off the existing access to the car park where the access to this site would be taken from. The site and the whole of Burnham Market is located within the AONB, however the site isn’t particularly

visible from the wider surrounding areas, given the topography, hence the ‘#’ score for the ‘landscape and amenity’ this also reflects the current built environment which surrounds the site and some consideration would need to be given to existing dwellings, particularly those along Herrings Lane. There are some general infrastructure issues relating to the capacity of the local Waste Water Treatment Works which apply to all options for growth.

H024 (20-01-20177583) – The site is located at the western edge of the settlement, whilst not as close to the centre of the village as other options it is still within a reasonable distance, hence the positive score for ‘access to services’. Development of the site would potentially create a number of affordable housing units which could be of benefit to the local community. Development of this site is likely to have a neutral impact with regard to economy a and b, as the site is classed as grade 4 agricultural land, although the promoters do acknowledge that part of the site is in agricultural use. The construction of the development would clearly support the economy but this would be relatively short term and the impact of additional residents on the local economy could be marginal. There are some general infrastructure issues relating to the capacity of the local Waste Water Treatment Works which apply to all options for growth. The score for ‘heritage’ is dependent upon implementation as whilst the site is at a distance from the Conservation Area and listed buildings, adjacent to the site is a Scheduled Ancient Monument. Planning permission (proposed twice and both withdrawn) and allocation through the SADMP has previously been sought for this site and through these processes concerns have been raised with regard to heritage. NCC HES considered that there is a very high potential for further heritage assets with archaeological interest (buried archaeological remains) to be present on site and that their significance will be adversely affected by development of the site. This was based upon the archaeological evaluation previously carried out at the site. The site is at the edge of the settlement and is clearly visible in the wider landscape therefore there is the potential to impact negatively on the AONB, this view was shared by the Norfolk Coast Partnership, CPRE and the Parish Council as part of the planning applications and previous SADMP site assessment, mentioned earlier. This means a negative score for ‘landscape and amenity’ and ‘#’ for Natural Environment. It is difficult to see how these concerns can ultimately be overcome and there are growth options available which do not experience these issues.

H025 (537 (08/11/2016)) – Similar to Site H024 in terms of location (at the western edge of the village) this results in the site displaying many of the same characteristics and therefore scores. Whilst not as close to the centre of the village as other options it is still within a reasonable distance, hence the positive score for ‘access to services’. Development of the site would potentially create a number of affordable housing units which could be of benefit to the local community. Development of this site is likely to have a neutral impact with regard to economy a and b, as the site is classed as grade 4 agricultural land, although the promoters state that part of the site is currently used as paddock. The construction of the development would clearly support the economy but this would be relatively short term and the impact of additional residents on the local economy could be marginal. There are some general infrastructure issues relating to the capacity of the local Waste Water Treatment Works which apply to all options for growth. The score for ‘heritage’ is neutral as the site is at a distance from the Conservation Area and not within close proximity to listed buildings or other heritage assets. The site is at the edge of the settlement and is clearly visible in the wider landscape therefore there is the potential to impact negatively on the AONB, hence the negative score for ‘landscape and environment’.

H026 (28-11-20169551) – The site is located relatively central to the village. The site is situated on the eastern side of Creake Road, to the south of Joan Short's Lane. To the south and west is existing development along Creake Road, mainly comprising housing but there is a petrol station/garage with some shops. This location ensures a positive score for 'access to services' as most of the services and facilities on offer at Burnham Market are only a short distance away. The score for 'community and social' is highly positive as the site has the potential to provide a new Doctor's Surgery for the local area. The promoters of the site state that NHS West Norfolk Clinical Commissioning Group have announced a specific funding stream to facilitate the delivery of the new GP Surgery at this site, this would likely mean the existing GP Surgery would close. The site could also provide a number of affordable housing units in area of known high values. Development of this site is likely to have a neutral impact with regard to 'economy b' as although the site is within current agricultural use the site is classed as grade 4 agricultural land. Part of the site is fields and the other part is a mixture of buildings/structure including barns and a couple of dwellings mainly related to agriculture some parts are clearly developed and a portion could be classed as brownfield. The removal of this from a central area of the village, although a rural area, could be seen as a benefit. Likewise the score with regard to 'economy a' is considered to be neutral as whilst clearly a new surgery would create jobs, this would be offset somewhat by the closure of existing health facility, therefore any increase in employment is likely to be marginal. The site is with Flood Zone 1 and therefore is awarded a positive score. In terms of access NCC as the local highway authority consider that there are potential constraints but these could be overcome through development and it is believed that any potential impact on the functioning of local road network could be reasonably mitigated. The Conservation Area is located to north and west of the site, and the centre of Burnham Market contains a number of listed buildings, these and their settings will need to be taken into careful consideration in the design of any scheme. Likewise the wider landscape will need to be considered as the site and indeed the village is wholly within the AONB. Part of this site was subject to a pre-application for a GP Surgery in 2017, this was determined as likely to refuse as it was considered at that time that the scale of the buildings proposed was unacceptable. Clearly any scheme should reflect the site and its context. Specifically in relation to the historic and natural environment.

SADMP Allocation

G17.1 – This site is allocated by the SADMP for a residential development of 32 dwellings, 1.2 ha public car parking space, some commercial use and public toilets.

Burnham Market - Sustainability Appraisal – Site Discussion

The village of Burnham Market is one which is located wholly within the Norfolk Coast AONB, and has a rich historic built environment with the Burnham Market Conservation Area covering a significant portion of the settlement as well as a large number of listed buildings within this. This landscape setting and rich heritage offer challenges to the future growth of the village which need to ensure that the integrity of the village is maintained. The design of any development and in particular its massing and materials will most likely need to have regard to any potential impact upon the Burnham Market Conservation Area, its setting, and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty.

The sustainability appraisal shows that two of the four sites proposed as growth options for the village could have a negative impact upon the landscape, H024 & H025.

Site H023 scored positively overall, with the only negative attributed to 'infrastructure, waste and pollution' which relates to the capacity of the water treatment works to serve the whole village and therefore is true of all of the growth options. The site is well located in terms of proximity to centre of the village and services/ facilities currently available there. Access is achievable and other associated impacts are considered to be mitigatable. However this specific area of the village has experienced a relatively large degree of development in the form of the SADMP allocation for 30+ houses, and extensive carpark and other associated facilities. The site is only capable of accommodating a maximum of 8 dwellings, due to size and access/highway restricts.

Site H026 also scored positively overall and has the potential to deliver a new health care facility for the village and wider area, this facility may also have the potential for future expansion. The promoters of the site have put forward this proposal which also includes the provision of 29 dwellings, whilst this is clearly more dwellings than sought this could still be appropriate as other Key Rural Service Centres may not be able to meet the need identified for them and Burnham Market has been identified as a highly sustainable location, and the addition of a new health facility is considered to be a positive opportunity.

Burnham Market – Sustainability Appraisal – Site Conclusion

- After careful consideration and on balance it is considered appropriate to propose Site H026 for allocation for the provision of a new GP Surgery and 29 dwellings. The promoters have suggested this level of housing and the Borough Council considers this to be an appropriate number given the site and the context.

A1

NOTES
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All dimensions are to be checked on site before
work is commenced.
Any discrepancies are to be reported immediately
to the consultants.

0m 2m 4m 6m 8m 10m

Crabb Hill Farm

JOAN SHORT'S LANE

existing
hedge

in-fill
hedge

43m
visibility
splay
as per
pre-
application
advice

GARDENS

DEMENTIA
SUITE
ENTRANCE

DEMENTIA / WELLNESS
GARDEN

AMBULANCE / DELIVERIES

new surface
water
soakaways

DROP-OFF

MAIN
ENTRANCE

BIKES

existing location
of 30
20mph sign

2.4m
set back
as per
pre-
application
advice

re-align existing
hedge along new
visibility line

existing
hedge

PROPOSED SITE

CREAKE ROAD (B1355)

relocated 30
20
mph sign to
extend 20mph
zone & reduce
visibilty splay

43m
visibility
splay

Garage

BACK LANE

PROPOSED DRAINAGE

FOUL - New foul sewer to be connected to
Anglian Water mains

SURFACE - Surface water to be drained into
new soakaways

LEGEND

Hard Landscape

Footpath - tarmac

Parking bays marking - white paint

Disabled parking bay signage

No parking areas - yellow paint

Road

Road marking - white paint

Identification text - white paint

Soft Landscape

Grass areas - Rye

Planting bed

CAR PARKING

Medical Centre Staff (1 per FTE) 13 spaces

Visitors (2 per Consult/Exam Room) 22 spaces

Total (including 3 disabled spaces) 35 spaces

Drop-off point 2 spaces

Designated ambulance parking 1 space

BICYCLE PARKING

Medical Centre Staff (1 per 4 FTE) 3 spaces

Visitors (2 per Consult/Exam Room) 22 spaces

Required (5% of expected users) 1.25 spaces

Total provided 4 spaces

C	updated to reflect planning comments	15-10-19	MR	MA
B	updated to reflect planning comments	12-09-19	MR	-
A	updated ready for planning application	05-07-19	RF	AP
REV	DESCRIPTION	DATE	AUTH	CHKD

PSD Primary
Secondary
Design
Highfield House, Bartons Road, Fordingbridge, Hants, SP6 1JD
Tel: 01425 650 080 Fax: 01425 654 519
Web: www.psdesignltd.co.uk

PROJECT
Proposed Medical Centre
Burnham Market
Norfolk

DRAWING
Site/Block Plan

SCALE	DATE	AUTHOR	CHKD
1:200 @ A1	12/06/19	RF	
ORIGINATOR DATE	DRAWING NO	REV	
May 2018	61 P 02	C	





Land at Creake Road, Burnham Market

Vision Statement

September 2021

HOLKHAM



cowper griffith architects

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Introduction

HOLKHAM

This Vision Statement has been prepared as part of the formal response to the Kings Lynn and West Norfolk Council publication of their Regulation 19 version of the Local Plan (pre-submission stage 2021).

This document has been prepared by the project team on behalf of the Holkham Estate who have a number of landholdings within the Council's administrative area and consequently continue to monitor and submit relevant and appropriate representations to consultation publications.

The Estate has responded to each relevant consultation stage in respect of the Local Plan Review and in 2019 submitted representations to the Regulation 18 stage in support of the then 2.7 hectare allocated site at Burnham Market – the site was allocated for at least 29 dwellings and a GP doctor's surgery.

The site has now been de-allocated since the Regulation 18 stage and is one of a number of allocated sites that have been removed from the Regulation 19 version of the Plan.

Paragraph 1.0.7 of the Regulation 19 document states "There are only two new housing sites allocated in this Local Plan – one in Marham and one in Terrington St. Clement (other sites are being carried forward). Some sites within the 2016 Plan will be de-allocated as they are not being brought forward for development and are no longer required to meet the Council's Five Year Housing Land Supply or Housing Need Requirement."

The Estate remains of the view that the allocation, albeit amended following the granting of permission for the GP surgery, should be reinstated into the Local Plan.

This Vision document identifies the site and its surroundings and demonstrates that there are clear and convincing reasons from a design and layout perspective why the site should continue to be identified for residential development.

This document needs to be read alongside the parallel representations that are being made to the Plan to seek the allocations on the basis of need and other policy considerations.



01 Site Location Plan (Not to Scale)

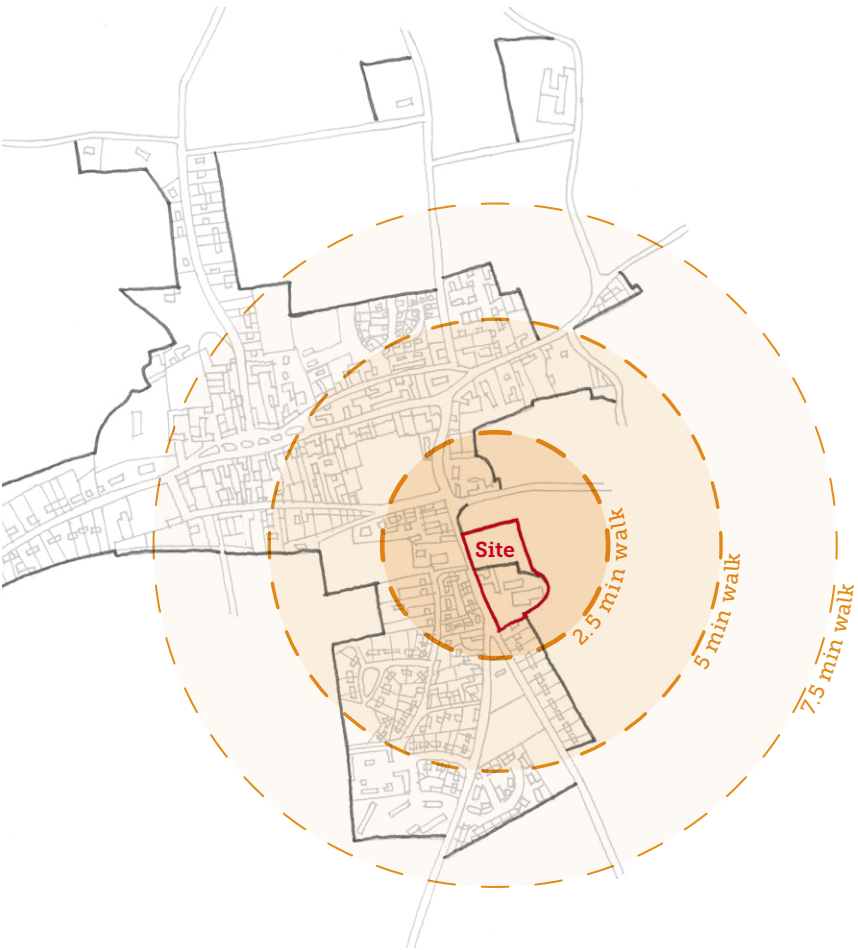


02 New GP Surgery Layout (Application No. 19/01239)

Context

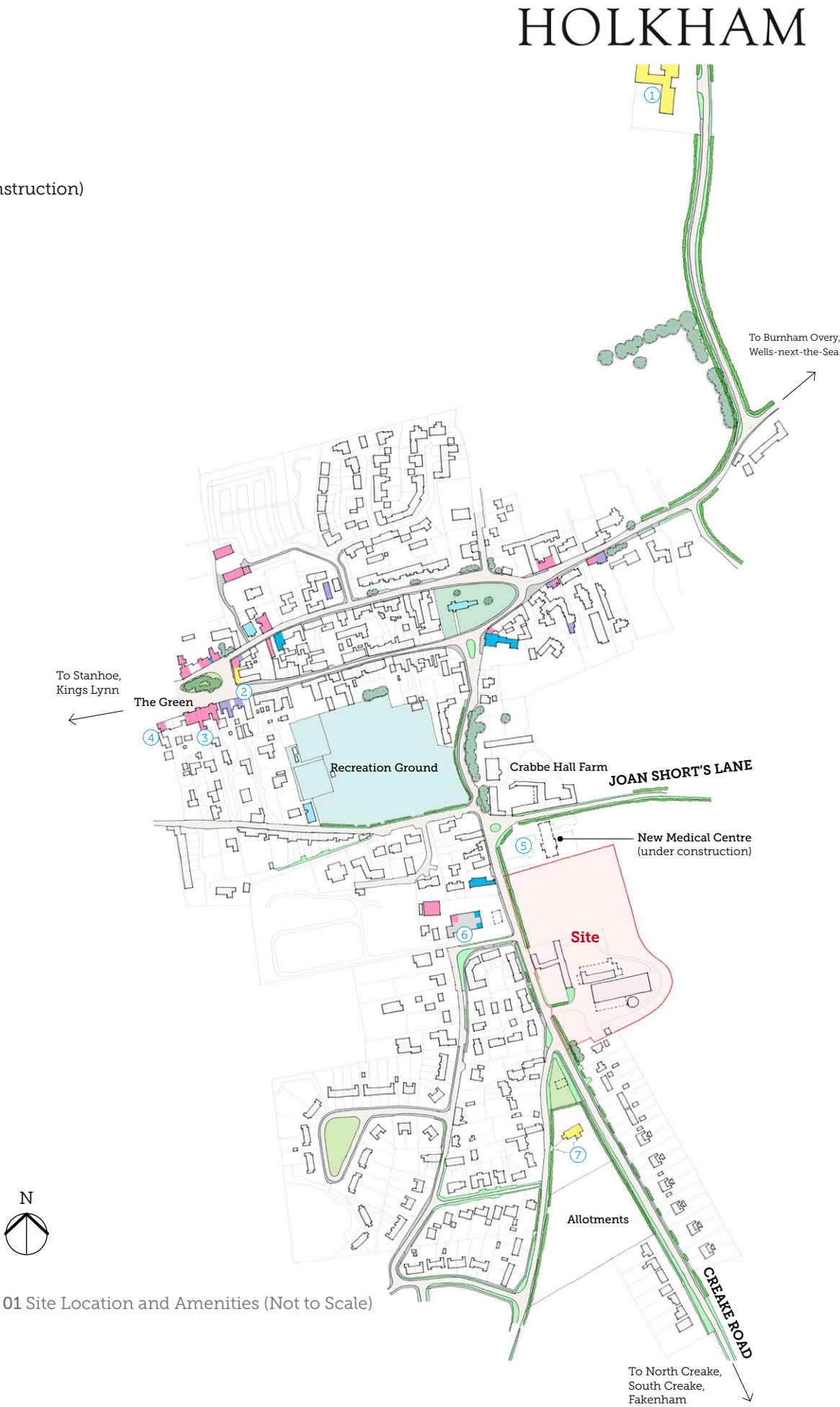
As previously stated, the Regulation 18 version of the Local Plan allocated a 2.7 hectare site for development. Clearly at that time, the Council were supportive of the principle of development in that location. The site lies to the east of Creake Road at Burnham Market where part of the proposed site is under construction for a new Medical Centre. Open land lies immediately to the south with the remaining land comprised of a number of agricultural buildings.

Located to the south-east of the cluster of those dwellings forming the village centre, the site lays within easy walking distance of most of the village services and facilities. From its suitability assessment undertaken by the Council in its Housing and Employment Land Availability Assessments (HELAA) it scored a series of green and ambers leading the Council to conclude the site was suitable for development.



01 Walking Distances (Not to scale)

- Key:
- 1 Primary School
 - 2 Dental surgery
 - 3 Post Office
 - 4 Pharmacy
 - 5 New Medical Centre (Under Construction)
 - 6 Burnham Motors Garage
 - 7 Village Hall
-
- General retail
 - Gallery
 - Community and health
 - Pub, cafe, food to go etc.
 - Religious



01 Site Location and Amenities (Not to Scale)

Site and Surrounding Area

Burnham Market is located near to the coast within an area designated as an Area of Outstanding Natural Beauty (AONB). It contains a number of fine historic buildings which are based around the high street. Development has occurred along a number of roads leading into and out of the village. There are glimpses of the village on approaches to the settlement. The site lies on the east side of Creak Road and is comprised of agricultural land. The Conservation Area lies to the north and west of the site and the granting of the permission for the GP surgery and its subsequent construction means that the proposed development will not affect the setting and character of that designated area.



1 View of Site from Joan Short's Lane



2 View of fields to West of Burnham Market

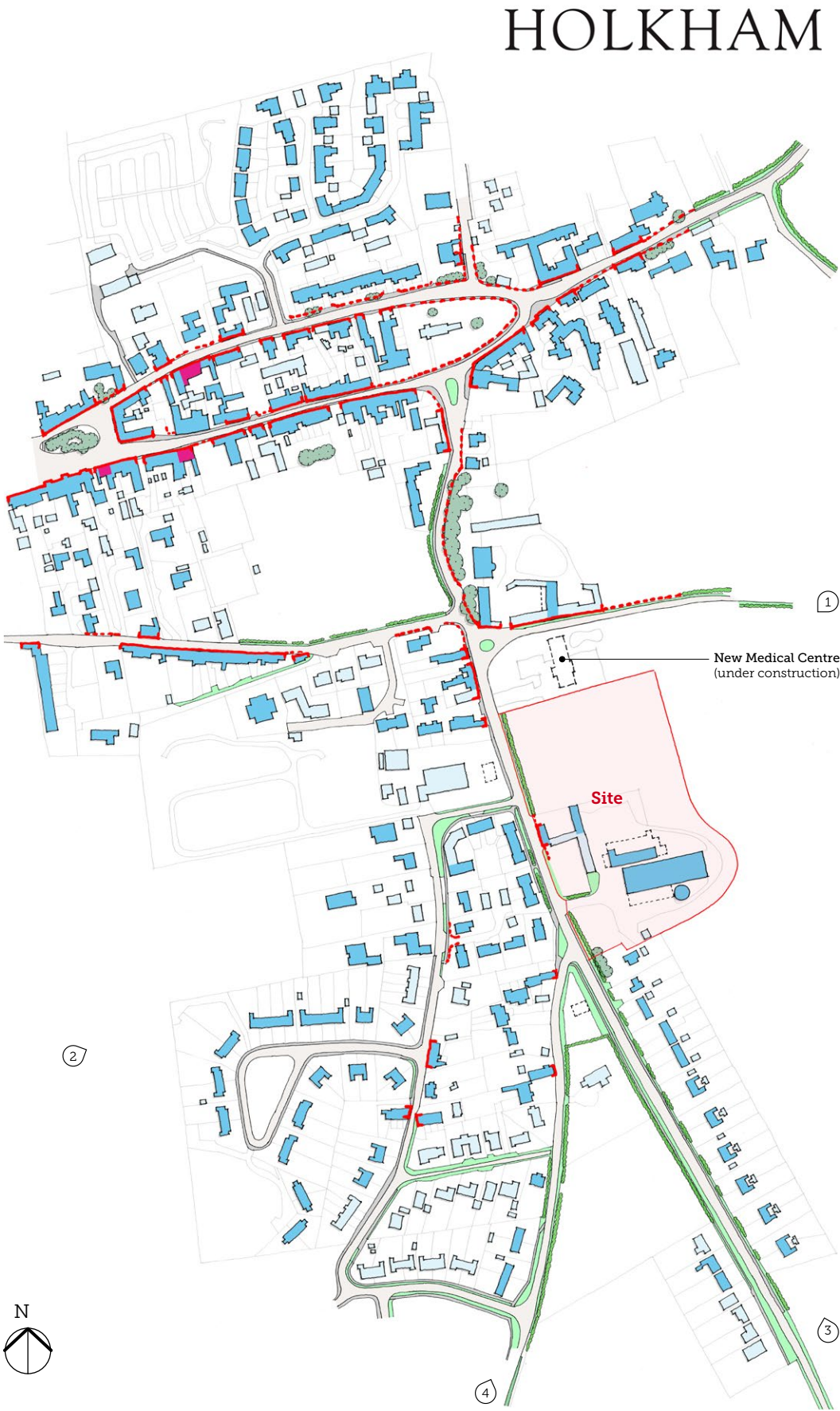


3 View looking North towards Site from adjacent fields



4 View towards Site from Beacon Hill Road

- Key:
- 1 storey
 - 2 storeys
 - 3 storeys
 - Building fronting street
 - Wall fronting street
 - Hedge and verge edge
 - # Viewpoint



01 Building Heights and Street Edges (Not to Scale)

Constraints and Opportunities

The proposed site lies relatively central to the village on the eastern side of Creake Road and to the south of the GP surgery currently being constructed at the time of writing. Its location means that it has relatively good access to services within the village given the scale and size of the village and the facilities it possesses, including the adjacent surgery when fully open and operational. The land in question is comprised of Grade 4 agricultural land together with buildings and structures associated with that agricultural use and their removal from this location of the village should be viewed as a benefit.

The land lies within Flood Zone 1 which means there is a low probability of flooding. As previously noted, the Conservation Area lies to the north and west of the site, thus it is considered that there will be no visual impact as a result of development coming forward on the site. It is appreciated that the site and the village as a whole lies within the designated Area of Outstanding Natural Beauty and as such, we consider that the nature and character of the site and its surroundings allow for the development to be accommodated within the landscape. The Council took this view in 2019 in its publication of the Regulation 18 version of the Local Plan

Key:

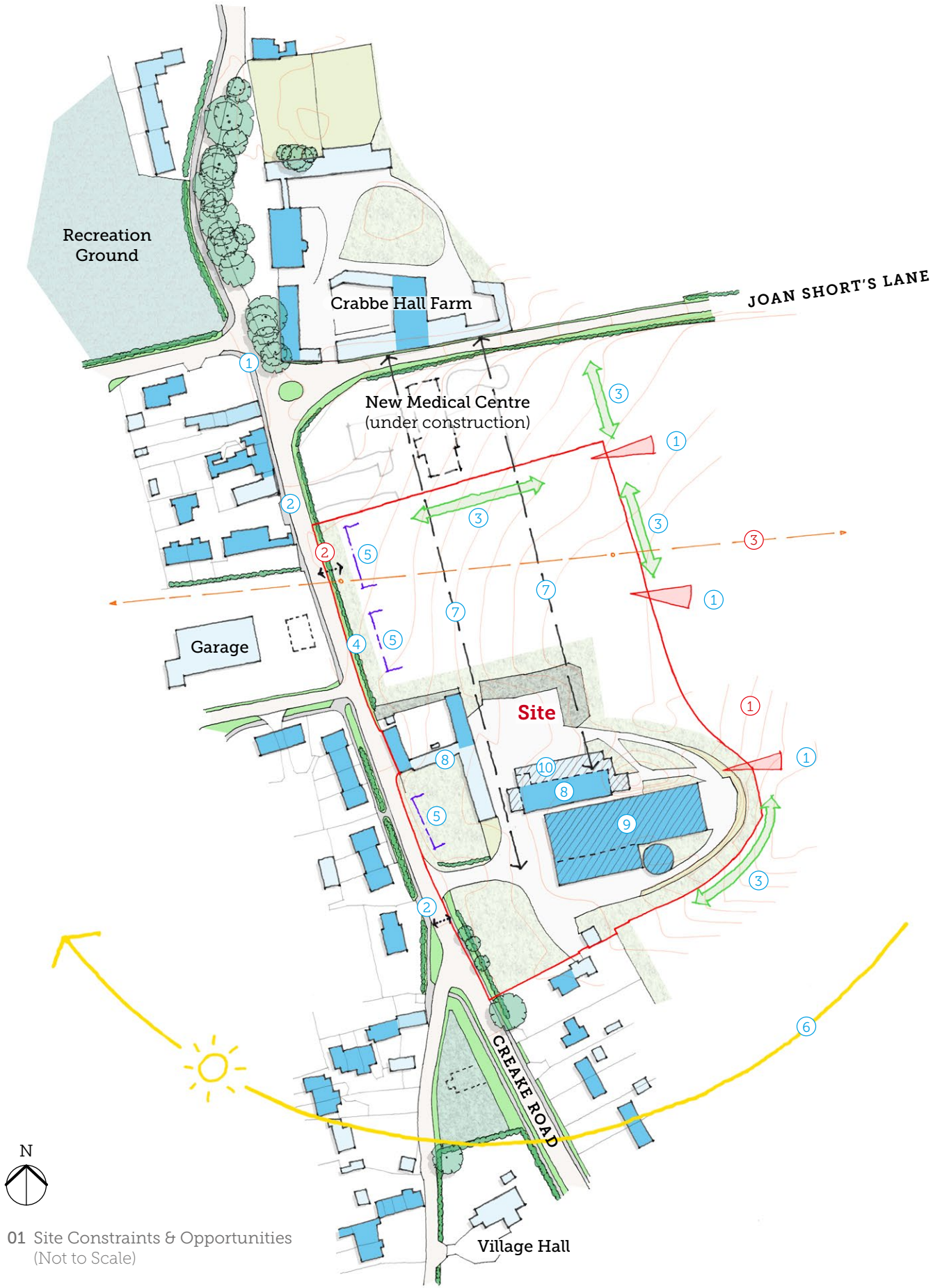
- 1 Storey Building
- 2 Storey Building
- ④ Opportunity
- ③ Constraint

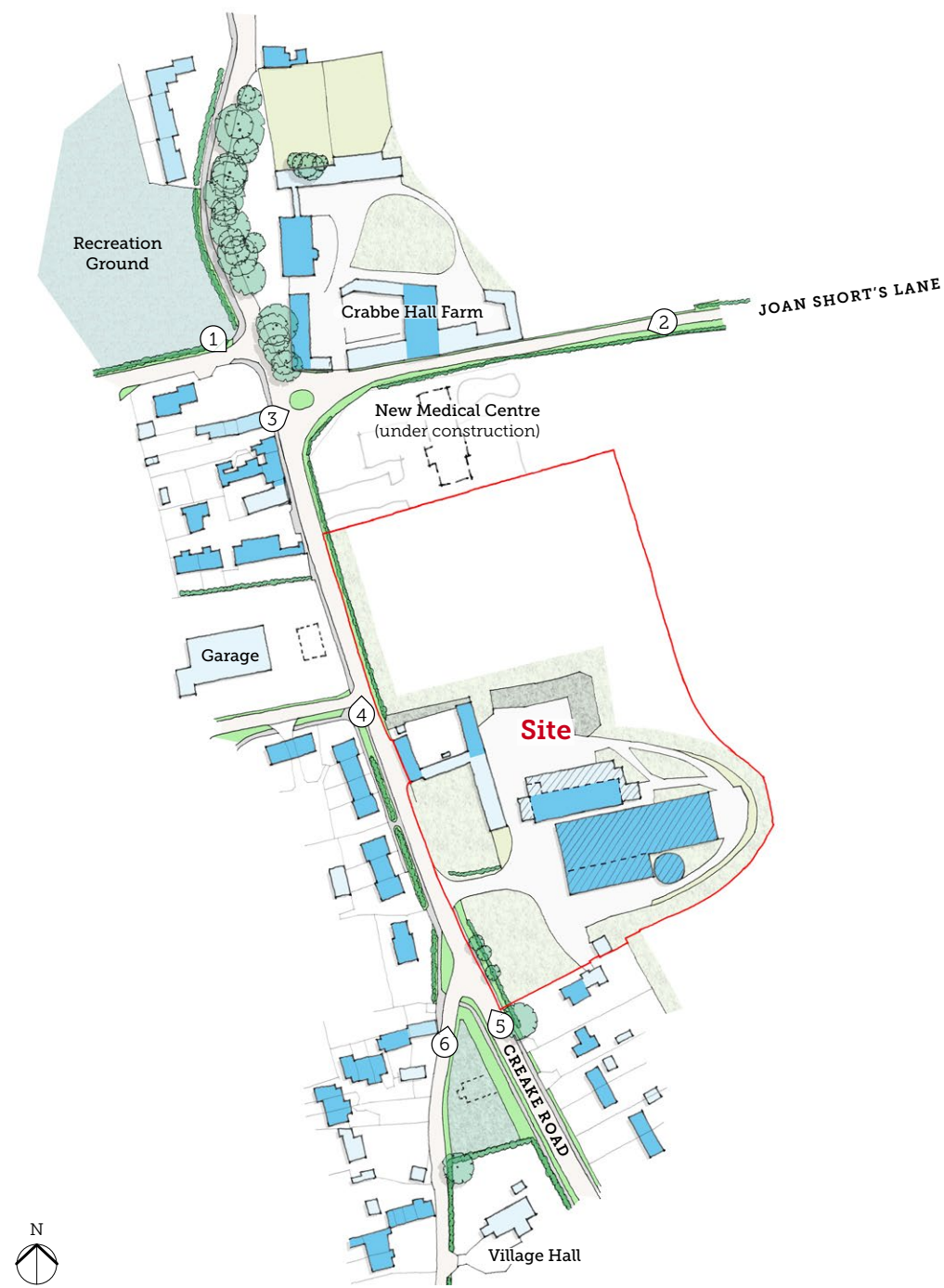
Opportunities

- 1 Views
- 2 New pedestrian crossings
- 3 New vegetated buffer
- 4 Enhance existing hedge
- 5 New development addressing street
- 6 Development orientated for sunlight
- 7 Heritage views linking farm buildings
- 8 Retain and reuse farm structures
- 9 Removal of modern farm buildings

Constraints

- 1 Topography of site
- 2 Minimise new openings in existing hedgerows
- 3 Existing overhead electrical cable





1 View of North-West corner of Site from Recreation Ground



4 View along Creak Road with Site on right. Burnham Motors on left



2 View along Joan Short's Lane with Crabbe Hall Farm on right



5 View along Creak Road

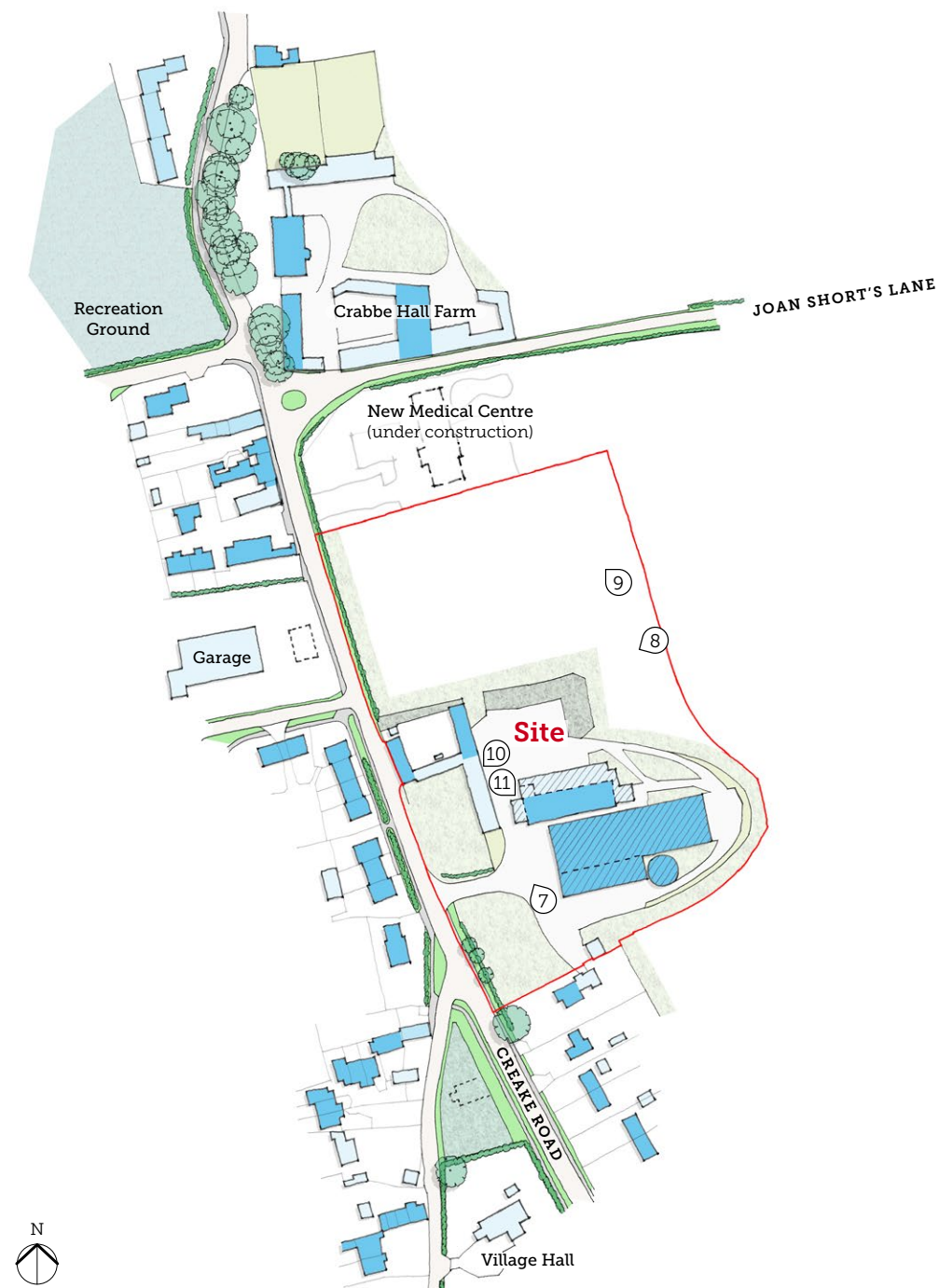


3 View along Joan Short's Lane with Crabbe Hall Farm on left. Site on right



6 View along Beacon Hill Road of agricultural buildings on Site

01 Photo Location Key



01 Photo Location Key



7 View looking North of existing agricultural buildings on Site



10 Existing Cart Shed on Site



8 View looking West of existing agricultural buildings on Site



11 Existing Barn on Site with 1970s extension on right



9 View looking North-west across farmland towards Crabbe Hall Farm

Development Strategy

Building A Sense of Place

A Safe Environment

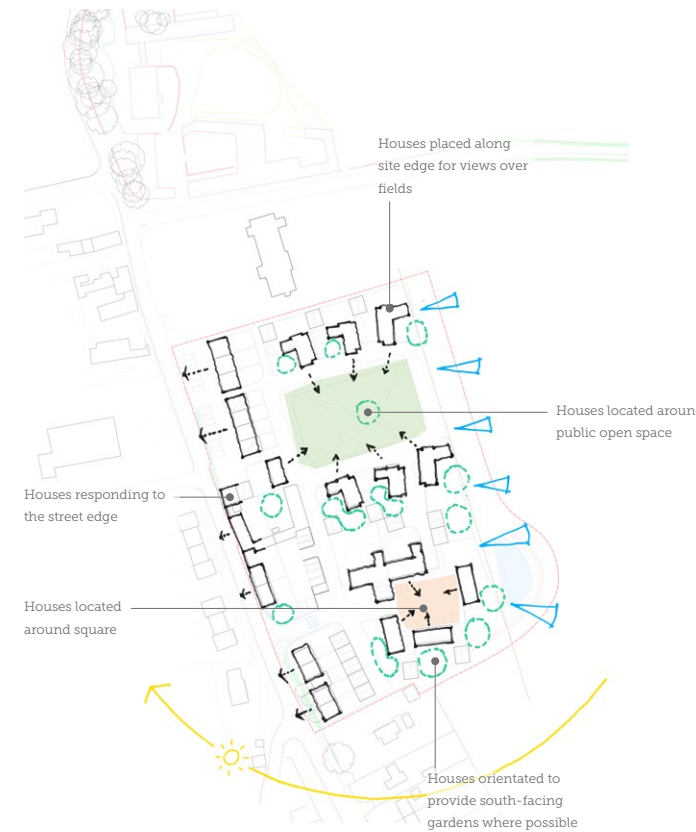
- A safe and 'walkable' neighbourhood with a strong and well delineated pedestrian environment.
- Making streets as social places with a high quality of public space.
- Calming the traffic by keeping the cars in view, and giving the pedestrian possession of the street.
- Avoiding kerbs and varying the width of the road to slow down the cars, reflecting the village environment and Burnham Market 'Green'.
- Parking next to the home within the private curtilage with a garage for every house, and with space for visitors to park on the street 'in view'.

Norfolk spaces

- Stitching together the open spaces within the new community with well defined routes and vistas.
- Making consistent building lines and strong street edges following the pattern of the centre of the village.
- Building garden walls and enclosures continuing the tradition of the village.
- Placing the Green and the square at the centre of the development, encouraging residents to take ownership and make it their own. Avoiding the green space 'stuck on the edge'.

Landscape

- Engaging with the wider landscape and creating wildlife corridors.
- Creating a vegetated framework in order to assimilate the development into the wider landscape.
- Safeguarding views from the east.
- Creating grass verges and hedgerows, with pavements only where they are needed.



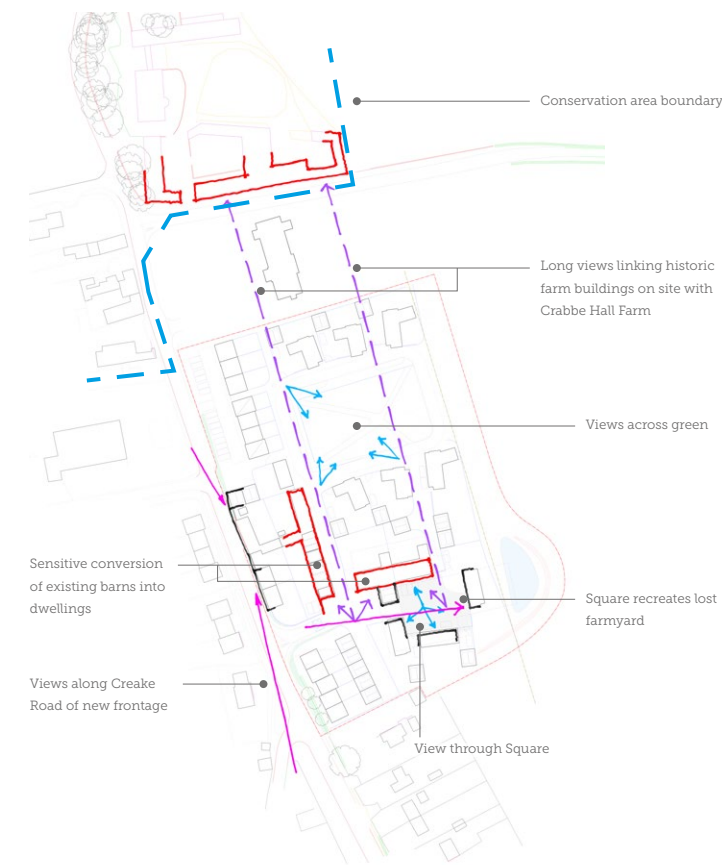
01 Structuring the Community



02 Ecology and Open Space



03 Routes and Movement



04 Heritage and Views



05 Street Edges

Concept Masterplan

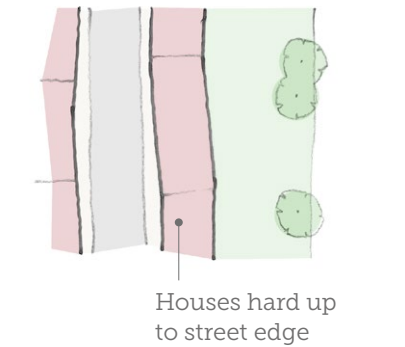
The concept masterplan shows a suggested layout where 29 dwellings would be delivered on a newly allocated site within the Local Plan. In the circumstances where the Council had previously allocated this land for development, then there remains sound reasons why it should remain identified for development.

The drawing proposes an indicative design and layout to accommodate at least 29 dwellings on that land south of Joan Short’s Lane and south of that area of land that has the benefit of planning permission for the GP Surgery and which is now under construction. In building up the design principles it has been critical to identify a safe and walkable neighbourhood which feels part of the village’s character and fabric whilst at the same time ensuring that there is a satisfactory relationship with surrounding land and buildings. Consequently the masterplan shows a strong relationship with Creake Road to include new dwellings as well as the proposed conversion of a number of the existing farm buildings. Within the centre of the site is a new large open space together with a new square in the southern part of the site. The boundary is formed by a strong landscaped edge which reflects the importance of the sensitivity of the landscape within the AONB and the importance of creating net biodiversity gain as part of this development. It is important to acknowledge that this Vision Statement only presents one suggested layout and has been submitted to confirm the ability of the site to accommodate development having regard to the relationship to the village and the sensitivities of the surrounding landscape

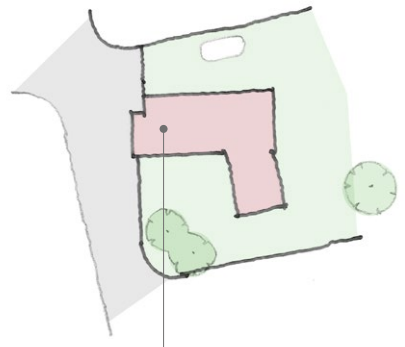
In such a context, the indicative scheme as put forward within the Vision Document is only one way of setting out a deliverable scheme which not only delivers the market housing but also affordable housing consistent with emerging policy. There is no doubt that housing demand exists within Burnham Market and in this context the Estate commissioned Housing Vision Limited to undertake a postal survey of the need for suitable housing circulated to all residential households in the parishes of Brancaster, Burnham Market, Burnham Norton, Burnham Overy, Burnham Thorpe, Docking, North Creake, South Creake and Stanhoe in April 2021. These nine parishes have been referred to within the Housing Vision Ltd document as the “Burnham Market area”. The survey listed a number of salient questions as it related to housing need and reflected the case that there is a need within Burnham Market and the contribution that our site could make to providing new affordable housing as well as market housing should not be underestimated in such a context. The summary of the findings are contained within Appendix 5 of the submitted representations

The scheme for 29 dwellings as shown within the indicative layout incorporates a suggested mix of 4no. 1-bed dwellings, 9no. 2-bed dwellings, 11no. 3-bed dwellings and 5no. 4-bed dwellings and providing a range of dwelling sizes across the site. Consistent with Draft Local Plan policy LP28 on affordable housing the site proposes 20% affordable housing and these 6no. dwellings are shown as fronting Creake Road in the suggested layout.

- Key:
- New Build Affordable House
 - Conversion of Existing Barn to Residential Use
 - Plot Number
 - Number of Bedrooms



01 Existing Burnham Market Village Centre Housing



02 Proposed Courtyard Housing



03 Indicative Site Layout (Not to Scale)

Access and Circulation

The granting of the planning permission for the GP surgery has established the consent for a new vehicular access off Creake Road just to the north of the proposed allocation site. The splays for such an access extend southwards along the frontage of the proposed site but the layout as suggested should not adversely such movements in and out of that access point .

A new vehicular access point to serve the row of six terraced dwellings is proposed further to the south with a main vehicular access to serve the remaining dwellings further along Creake Road.

Internal roads and footways would be designed as shared surfaces to avoid an urban appearance of separate roads, kerbs and pavements. The shared surface design approach will incorporate indirect traffic routes, ‘gateways’ between

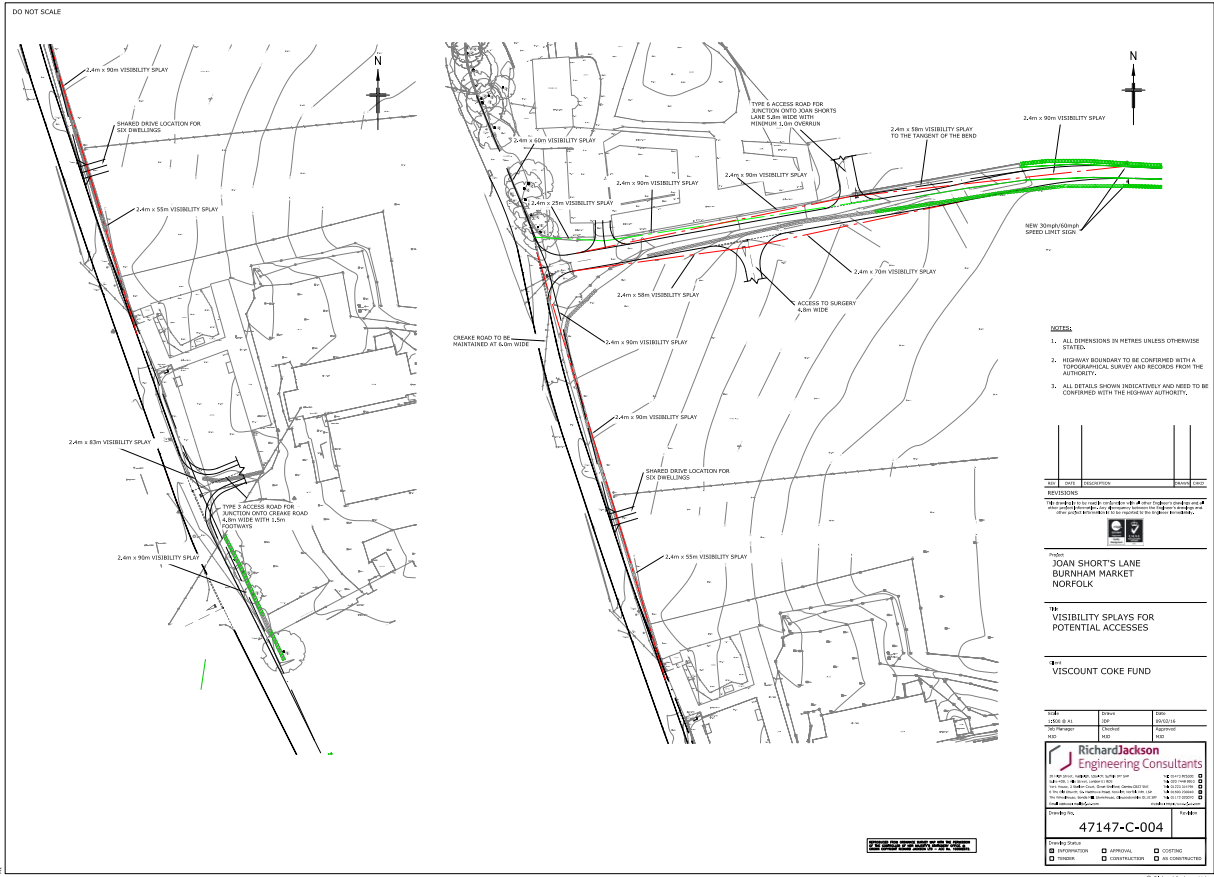
buildings, areas of planting, and features to encourage the use of the street, such as seating.

Pedestrian routes would connect all areas of the site with paths linking to the new neighbouring Medical Centre. Diagonal paths will crisscross the green, and give access to the landscape buffer along the eastern boundary. The materials used for both roads and footways will be a combination of paving types, and textures, and bound gravel in colours to harmonise with the red brick and flint of the buildings.

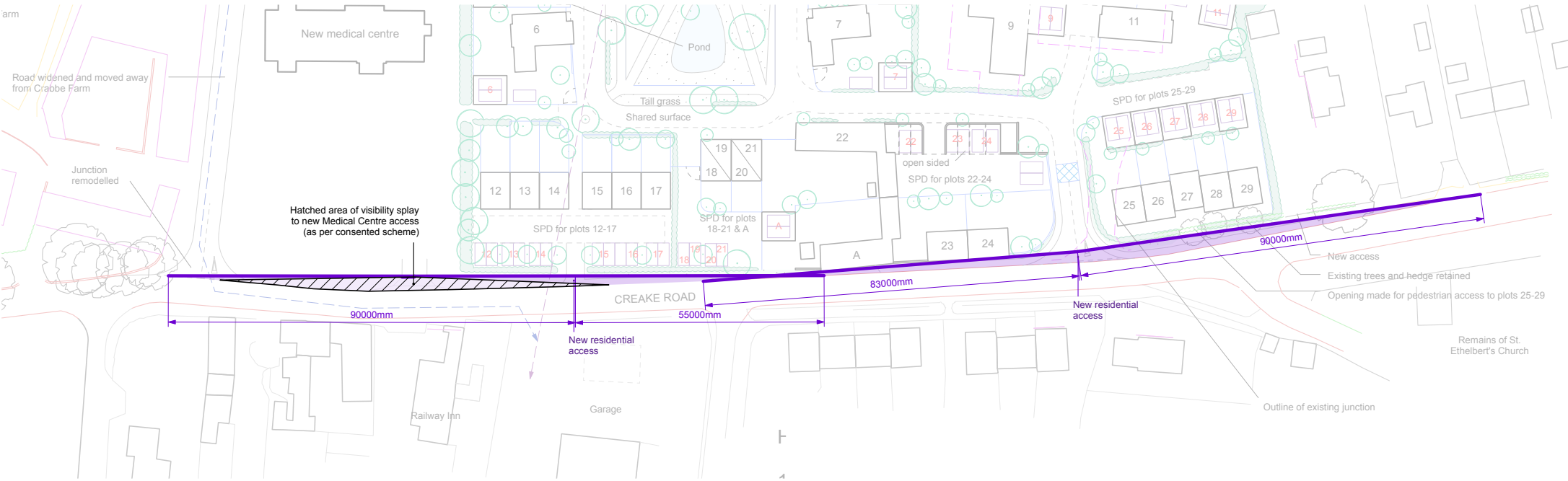
The number and size of parking spaces would meet current policy standards, generously dimensioned to easily accommodate larger modern vehicles. In addition to parking allocated to individual plots, visitor parking spaces would also be provided elsewhere on the site.



01 Example of indicative Shared Surface



03 Previous Highway Strategy not incorporating new Medical Centre Access (produced in 2016 by Richard Jackson Engineering Consultants)



02 Indicative Highway Strategy incorporating new Medical Centre Access (Not to Scale)

Character and Materials

HOLKHAM

Form
We propose a variety of architectural forms, learning from North Norfolk, Burnham Market and the Holkham Estate tradition of strong rural buildings.

Our aim is to integrate the development into the wider townscape and respond to the local context and regional identity.

Courtyard housing is used to structure good private space and maximise the south-west orientation of gardens.

Materials
The proposals seek to draw upon the local material palette; materials may include red brick, coursed flintwork, chalk or rubble walling and red pantiles. One or two may be finished in the 'other' tradition of Holkham brick, flintwork and black pantiles.

Around Burnham Market there is instances of black pitch brickwork, faded and weathered hardwood boarding and metal roofing, and these may be suitable around the surviving old barns on the site.

The style of the houses will draw from traditional detailing with large contemporary glazed doors to the courtyard gardens ideal for modern living.

Contemporary use of traditional materials



Materials drawn from Burnham Market and wider North Norfolk setting



Recommendations

Having regard to the contents within this Vision Document and the previous references to the site with the *Regulation 18* version of the Local Plan, we respectfully suggest the inclusion of this 2.1 hectare site for new residential development based on the following suggested policy:

"Land amounting to 2.1 hectares as shown on the policies map, is allocated for residential development of at least 29 dwellings.

Development will be subject to compliance with all of the following:

1. Safe access being achieved to the satisfaction of Norfolk County Council as the Local Highways Authority;
2. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with this submission;
3. The site may be affected by contamination from a previous use. Responsibility for securing a safe development rests with the developer and/or landowner. The planning application for the site will need to include an assessment to ensure that the site can be made suitable for its proposed use. Adequate site investigation information, prepared by a competent person, will be required to inform this assessment;
4. A programme of publicity aimed at occupants of the development and other residents in Burnham Market highlighting the opportunity for recreation (especially dog walking) in the vicinity avoiding areas within the Wash Special Protection Area and the North Norfolk Coast Special Protection Area. This will highlight the sensitivity of those protected areas to dog walking and other recreation;
5. The existing barn style residential dwellings to be retained;
6. The design of development and in particular its massing and materials, should have regard to its potential impact on the setting of Burnham Market Conservation Area and the scenic beauty of the Norfolk Coast Area of Outstanding Natural Beauty;
7. Incorporation of a high quality landscaping scheme to the eastern boundary to minimise the impact of the development on the wider countryside; and
8. The provision of affordable housing in line with the current standards."

HOLKHAM



01 Suggested Materials and Architectural Form

02 Indicative Aerial Overview

HOLKHAM



savills

cowper griffith architects

Housing Needs Assessment and Housing Needs Survey for the Burnham Market area

Summary Report

Housing Needs Assessment

- 1.1 The Housing Needs Assessment established a context for the Resident Survey of local housing need by profiling local demographic and housing market patterns and trends.
- 1.2 The Assessment focused on the parishes of Brancaster, Burnham Market, Burnham Norton, Burnham Overy, Burnham Thorpe, Docking, North Creak, South Creak and Stanhoe, located in the King's Lynn and West Norfolk District Council area, and known collectively as the Burnham Market area.
- 1.3 The area had a resident population of 4,516 in 2011, ranging from 134 in Burnham Overy to 1,200 in Docking.
- 1.4 Based on 2018-based population projections, applying a district-wide growth rate of 4.2% would result in an estimated growth of 190 people across the 9 parishes.
- 1.5 Population growth is heavily skewed towards those aged 65+ (+28.9%) and is projected to decline in all other age bands.
- 1.6 There were a total of 2,125 households across the 9 parishes in 2011, ranging from 64 in Burnham Overy to 490 in Docking.
- 1.7 Based on 2018-based household projections, applying a district-wide growth rate of 9.2% would result in an estimated growth of 195 households across the 9 parishes with an equivalent need for housing.
- 1.8 There is a high level of under-occupation of 3 or more bedrooms averaging 50% across the area and ranging from 43% in Docking to 62% in Stanhoe.
- 1.9 As an indicator of the number of second and holiday homes, 2011 Census data recorded 1,397 vacant properties across the 9 parishes, 38.6% of the total. The highest levels were in Burnham Overy (71%) and Brancaster (52%) and were lowest in North Creak (28%) and Docking (24%).
- 1.10 Very high sale prices were recorded overall and especially for 2 bed properties (£300-550k) and for 3 bed properties (£425-795k).
- 1.11 The 2011 Census recorded 330 private rented properties across the 9 parishes, 15.5% of the total. However, none were available at the time of the Assessment severely reducing options for local people.

- 1.12 The 2011 Census recorded 373 social rented and 12 shared ownership properties across the 9 parishes, 18.1% of the total.

Housing Needs Survey

Introduction

- 1.13 A postal survey of the need for suitable housing was circulated to all 3,363 residential households in the parishes of Brancaster, Burnham Market, Burnham Norton, Burnham Overy, Burnham Thorpe, Docking, North Creake, South Creake and Stanhoe in April 2021, and a reminder circulated in the following month.
- 1.14 A total of 327 questionnaires was returned which represents 9.7% of all addresses circulated and, in the context of the high number of second and holiday properties, it represents a more meaningful 16.2% of all occupied homes.

The current and future need for housing

- 1.15 90 responses identified a household member needing more suitable housing in the next 5 years.
- 1.16 The largest number of responses was received from Docking (26) and the second largest from Burnham Market (21), the other parishes each identified a need from between two and 8 households.
- 1.17 In relation to reasons for needing housing, multiple options could be selected. The most frequently chosen were 'need my own home' (30 responses) and 'need affordable accommodation' (25 responses) followed by 'need to move to a larger home' (16 responses); 'need to move to a smaller home' (15 responses) and 'need older persons' accommodation' (18 responses).
- 1.18 74 people identified that, including themselves, 159 people would move with them. 54 households consisted of only one or two people (69%); 16 consisted of 3 or 4 people (22%) and only 4 consisted of 5 or 6 people (5%).
- 1.19 19 moving households would include 33 young people under the age of 16, only 21% of total households.
- 1.20 52 moving households would include 87 people aged 16-60, 58% of total moving households.
- 1.21 39 moving households would include 57 people aged over 60, 43% of total moving households.
- 1.22 68 of the 85 moving households which recording their needs by composition consisted of adults without dependent children (80%). Only 17 households had dependent children (20%).

- 1.23 48 moving households needed only one or two bedrooms (53%) and 29 required 3 bedrooms (32%). However, 13 households required 4 or more bedrooms (14%).
- 1.24 A bungalow was the most frequently chosen type of home (by 68 people) and 9 people would consider 'sheltered housing'. This conforms with the relatively large number of older households and with the number also stating that they needed 'older persons' accommodation' and 'to move to a smaller home'.
- 1.25 72% of those providing an answer wished to remain in the 'parish where I live now'.
- 1.26 In relation to preferred tenure, multiple options could be selected. 'Affordable social rented' and 'Affordable Rented' housing were preferred by 37 and 34 people respectively which represented 41% and 38% of those needing suitable housing, affordable shared ownership was selected by 21 people (23%).
- 1.27 Of 49 people who would consider renting, 25 (51%) could pay less than £150 per week and 15 (31%) £150-199 per week. Only 9 people could pay more than this.
- 1.28 Most of those requiring a 1 bed property could pay less than £150 per week and most of those requiring a 2, 3 or 4 bed property could pay less than £200 per week.
- 1.29 Of 47 people who would consider buying, 9 (20%) could pay less than £500 per month; 16 (34%) could pay £500-699 per month and 22 (47%) could pay more than this amount.
- 1.30 Of 31 people who identified a price, 22 (71%) could pay up to £400,000 and only 10 people could pay more than this amount.

Current housing and personal circumstances

- 1.31 81 of the 90 people identifying a housing need already lived in the area (90%); 36 (40%) had close family there and 21 (23%) people also worked there.
- 1.32 8 people provided or received care (9%).
- 1.33 30 people were renting privately; 12 people were living with family and 9 were renting from a housing association.
- 1.34 90 people identified a total of 207 residents including themselves. 48 households consisted of only one or two people (53%); 25 consisted of 3 or 4 people (28%) and only 7 consisted of 5 or 6 people (8%).
- 1.35 22 of 90 households had 37 young people living with them (24%)
- 1.36 55 of 90 households had 121 people aged 16-60 living in their household (61%)

- 1.37 46 of 90 households (51%) included 73 people aged over 60 living with them.
- 1.38 24 households (27%) had one or two bedrooms; 51 (57%) had three bedrooms and 15 (17%) had 4 or more bedrooms.
- 1.39 11 people identified that somebody in their household had limited mobility or a disability, 12% of all those requiring more suitable housing.
- 1.40 4 people identified that their home met the needs of the person with limited mobility or a disability, but 7 identified that it did not meet their needs.
- 1.41 7 people identified that a member of their household had another special requirement, including the need for walk-in showers and a disabled 5-year old child needing a warm home.
- 1.42 Only 9 people stated that they had joined the King's Lynn and West Norfolk District Council housing waiting list, 10% of the total needing more suitable housing.
- 1.43 Of those providing a response, 13 people (15%) recorded a net income of £1,000 per month or less.
- 1.44 30 people (33%) recorded a net income of just over £1,000 to £2,000.
- 1.45 44 people (51%) had an income exceeding this amount.
- 1.46 Over 200 people provided a wide range of 'other comments' which represents a very high level of response. The main themes raised were
- the need for affordable housing and other housing for local people;
 - suggestions for improving the supply of affordable housing and other housing for local people; and
 - the impact on the housing market and the local area of second and holiday home ownership. These comments were mostly critical of the impact of the level of such ownership, and especially its increase.

Dr Richard Turkington, FRSA
Director and Project Coordinator
Housing Vision

15th September 2021

