

APPENDIX 1
BCKLWN Core Strategy Issue Statement No.13

Borough Council of
**King's Lynn &
West Norfolk**



Local Development Framework – Core Strategy
Examination in Public February 2011

Issue Statement No.13

Whether the policies (esp. CS03, CS04, CS05) and key diagrams (including the proposed changes) indicate the best general locations for 'employment expansion' and 'urban expansion' at the main towns (King's Lynn, Downham Market, Hunstanton), having regard to any reasonable and realistic alternatives.

Issue Statement No.13: Whether the policies (esp. CS03, CS04, CS05) and key diagrams (including the proposed changes) indicate the best general locations for ‘employment expansion’ and ‘urban expansion’ at the main towns (King’s Lynn, Downham Market, Hunstanton), having regard to any reasonable and realistic alternatives.

1.1 The tables below outline the reasons why the proposed focus points and directions for growth were selected. The Key Diagrams in the Core Strategy Proposed Submission document (KLWN/SUBMIT/001) illustrate these locations (pages 107-111).

King’s Lynn (Policy CS03)

	Urban expansion				
	Central part of town	West Lynn	South Wootton	North Wootton	West Winch
Flood Risk (see diagram in Appendix 1)	<ul style="list-style-type: none"> In part (west) 	<ul style="list-style-type: none"> Zone 3 	<ul style="list-style-type: none"> Zone 1 	<ul style="list-style-type: none"> Zone 1 	<ul style="list-style-type: none"> West of A10, and south of escarpment
Sustainability- e.g. <ul style="list-style-type: none"> Close to employment/residential? Connections/Transport 	<ul style="list-style-type: none"> Very good connectivity to residential and employment uses Transportation improvements required 	<ul style="list-style-type: none"> Need to improve connectivity with Town Centre Significant amount of brownfield land with river frontage 	<ul style="list-style-type: none"> Good connectivity with residential, employment and Town Centre services 	<ul style="list-style-type: none"> Good connectivity with residential, employment and Town Centre services 	<ul style="list-style-type: none"> Access across A47(T) is a manageable issue Need to improve traffic movement along A10 Potential to improve village services
Natural Assets	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Agricultural grazing 	<ul style="list-style-type: none"> Agricultural grazing 	<ul style="list-style-type: none"> Residual areas of former parkland; copses and hedgerows

Form / character	<ul style="list-style-type: none"> • Urban with historic interest 	<ul style="list-style-type: none"> • Urban with views of historic river frontage 	<ul style="list-style-type: none"> • Urban fringe, views across reclaimed marshland 	<ul style="list-style-type: none"> • Urban fringe, views across reclaimed marshland 	<ul style="list-style-type: none"> • Rural, higher land with extensive views
Infrastructure issues	<ul style="list-style-type: none"> • Transport • Flood defence • Urban Renewal 	<ul style="list-style-type: none"> • Access/ Transport • Flood defence • Urban Renewal 	<ul style="list-style-type: none"> • Sewerage 	<ul style="list-style-type: none"> • Sewerage 	<ul style="list-style-type: none"> • Traffic movement • Strategic High-pressure pipelines • Sewerage
Further information		<ul style="list-style-type: none"> • Outstanding PP for housing 	<ul style="list-style-type: none"> • AONB to east 	<ul style="list-style-type: none"> • AONB to north and east 	

	Employment expansion		
	South	South east	North
Flood Risk (see diagram in Appendix 1)	<ul style="list-style-type: none"> • Area is at flood risk. 	<ul style="list-style-type: none"> • Area is partially at flood risk. 	<ul style="list-style-type: none"> • Area is at flood risk.
Sustainability- e.g. <ul style="list-style-type: none"> • Close to employment/residential? • Connections /Transport 	<ul style="list-style-type: none"> • Location is in the same direction as the proposed residential growth and in close proximity to the town and existing residential uses to the south. • Well located for transport connections, adjacent to A47. 	<ul style="list-style-type: none"> • Location is in the same direction as the proposed residential growth and in close proximity to the town and existing residential uses to the south and east. • Well located for transport connections, adjacent to A47/ A149. Public transport connections. 	<ul style="list-style-type: none"> • Location an established port and associated employment area. • Close proximity to existing residential uses and town centre. • Road connections acceptable, although a further distance to A149/A47 etc
Natural Assets	<ul style="list-style-type: none"> • Little impact on natural environment as close to 	<ul style="list-style-type: none"> • Little impact on natural environment as neighbours 	<ul style="list-style-type: none"> • No impact.

	existing large scale employment-related uses e.g. Palm Paper and Power Station.	established employment estate, and residential uses.	
Form / character	<ul style="list-style-type: none"> Location neighbours similar established uses. Visible site adjacent to A47. Connected to town, fits in with character and form of area. 	<ul style="list-style-type: none"> Location neighbours similar established uses, obvious extension to existing estate. Visible site adjacent to A47/ A149. Well connected to town, complements character and form of area. 	<ul style="list-style-type: none"> An established employment area, in principle no issues for form and character.
Infrastructure issues	<ul style="list-style-type: none"> Not aware of any significant constraints, aside from flood risk. However there is no infrastructure in place on site at current time. 	<ul style="list-style-type: none"> Not aware of any significant constraints, aside from flood risk. May be concerns of surface water disposal, and land levels. 	<ul style="list-style-type: none"> H&S Hazard Zone centred on some port related activity and major manufacturer
Further information	<ul style="list-style-type: none"> Existing Local Plan allocation, however would not consider an area as large as allocation. 	<ul style="list-style-type: none"> Existing Local Plan allocation Council committed to bringing site forward (Growth point -key strategic site) Recent planning applications for retail superstore and associated roadways will create an access into the site from A149. 	<ul style="list-style-type: none"> Council seeks to protect and support the port, recognising its role in the town. Given nature of current uses there may be opportunity to make better use of this area, intensification of the employment area.

Downham Market (Policy CS04)

	Urban expansion East half of town	Employment expansion South West
Flood Risk	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Area is at flood risk.
Sustainability- e.g. <ul style="list-style-type: none"> • Close to employment/residential? • Connections/Transport 	<ul style="list-style-type: none"> • Close to existing residential • Access to Town Centre services and employment areas • Limited access to A10 and A1122 	<ul style="list-style-type: none"> • Close to exiting employment uses, and residential uses. Close to town centre. • Good transport links, both road and neighbours railway station. Walking distance to town centre. • Potential for tourism element utilising “river” frontage
Natural Assets	<ul style="list-style-type: none"> • Urban fringe generally screened from A10 and A1122 	<ul style="list-style-type: none"> • Little impact on natural environment as neighbours established employment estate, and residential uses
Form / character	<ul style="list-style-type: none"> • Agricultural land with trees and hedgerows constraining views 	<ul style="list-style-type: none"> • Location neighbours similar established employment uses, and residential. An obvious extension to town. Well connected to town, complements character and form of area.
Infrastructure issues	<ul style="list-style-type: none"> • No significant issues. 	<ul style="list-style-type: none"> • Not aware of any significant constraints, aside from flood risk.
Further information		<ul style="list-style-type: none"> • Existing Local Plan allocation – a small amount of the allocated land at Barton’s Drove has been developed.

Hunstanton (Policy CS05)

	Urban expansion	Employment expansion
	East and/or south	East
Flood Risk	<ul style="list-style-type: none"> There is no flood risk (apart from a minimal area on land to the south). 	<ul style="list-style-type: none"> There is no flood risk.
Sustainability- e.g. <ul style="list-style-type: none"> Close to employment/residential? Connections/Transport 	<ul style="list-style-type: none"> Both locations are located close to services and facilities. Growth to the east would be the more sustainable option, because of its close proximity to the town centre. Good public transport links Neighbours A149, good road links. 	<ul style="list-style-type: none"> Close to exiting employment estate, and residential uses. Close to town centre. Good public transport links Neighbours A149, good road links. Location is in the same direction as the proposed residential growth.
Natural Assets	<ul style="list-style-type: none"> Both locations may have an impact on the natural assets, particularly the landscape surrounding the town. The AONB is to the east and the gap between Heacham and Hunstanton to the south. This impact could be minimised through careful screening. 	<ul style="list-style-type: none"> Little impact on natural environment as neighbours established employment estate, and residential uses. However there may be a landscape impact on the AONB to the east. Any landscape impacts could be minimised through careful screening.
Form / character	<ul style="list-style-type: none"> To east of town, established residential and employment uses and a High school to east of A149 so would form an obvious extension to these. To south of town, established residential estate borders location and growth would form an obvious extension to this. Would not be contrary to nature/form of locality. 	<ul style="list-style-type: none"> The location neighbours established employment estate to east of A149, so would form an obvious extension to this. Opposite commercial and residential uses.
Infrastructure issues	<ul style="list-style-type: none"> Not aware of any significant constraints. 	<ul style="list-style-type: none"> Not aware of any significant constraints.
Further information	<ul style="list-style-type: none"> The Council has had discussions with the 	<ul style="list-style-type: none"> The location is an existing Local Plan allocation but

	<p>landowners of land to the east, and they have clarified that this land could be made available. This direction has also been put forward by the Town Council.</p> <ul style="list-style-type: none"> • The landowner of land to the south of the town is positively promoting development, and offers an alternative direction for growth in the town. Attached in Appendix 2 is their supporting statement. 	<p>has not been developed. We have clarified access is available through the employment area if necessary.</p> <ul style="list-style-type: none"> • Employment Land Study (KLWN/OTHER_SUPP/004) identifies a lack of demand in Hunstanton but recognises the need to provide opportunities to meet local needs. • The Council has had discussions with the landowners of land to the east, and they have clarified that this land could be made available. This direction has also been put forward by the Town Council.
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1.2 The Historic Landscape Characterisation Study (Appended to Issue Statement No.5) considers the three towns and the potential directions for growth. The Study concludes that there are no significant constraints in any of our towns which would prevent the growth proposed in the Core Strategy. However the document will help identify more detailed issues for consideration, and suggests mitigation measures which will be invaluable for decision-making in the Site Specific Allocations and Policies document.

1.3 The Sustainability Appraisals (S.A.) (KLWN/CORE/009-15 and KLWN/SUBMIT/006-9) have informed the Council's policy approach throughout the Core Strategy process (which is outlined in 'Sustainability Appraisal of the Core Strategy - commentary on the stages undertaken' (KLWN/SUBMIT/009)). For example, at the Issues and Options stage the S.A. considered the different options for growth. The S.A. process has also considered the preference for development on brownfield land prior to developing greenfield sites. But then these have been balanced against the RSS requirement for housing and jobs, and the economic aspirations for the borough. The S.A. also provides mitigation measures for each policy approach and these will help to inform further discussion and the Site Specific Allocations and Policies process.

2. Alternative options

2.1 There were few reasonable and realistic alternatives to the proposed urban expansion and employment expansion sites outlined in the Core Strategy; however these are detailed and discussed below.

2.2 King's Lynn – Urban expansion and employment provision

- The town is severely constrained by tidal and fluvial flood risk extending roughly to the west of a line from the A10 to the former rail track west of South and North Wootton. There is also a significant risk of fluvial flooding extending eastwards, both along the Gaywood River valley and also the Middleton Stop Drain. The Norfolk Coast Area of Outstanding National Beauty abuts the north west edge of North Wootton and follows the urban boundary eastwards, around South Wootton, to the A148 and continues further east.
- It follows therefore that there is little real alternative to the urban expansion areas shown without proposing major greenfield development on land currently or projected to be at a high level of flood risk, or alternatively with the AONB; neither approaches sits comfortably with national policy set out in PPS7 and PPS 25.
- Guided by the findings of the Strategic Flood Risk Assessment (KLWN/OTHER_SUPP/013 & 014), the Council felt compelled to abandon a Local Plan proposal to secure a large town Expansion Area south of the A47(T). This significant scheme incorporated a high infrastructure requirement and had seen little positive interest in bringing a scheme forward. A smaller part of the employment area proposed in that scheme has been retained south of Saddlebow junction with the A47(T). Consideration was also given to replacing part of the residential element with employment on land at flood risk south of Hardwick Narrows. This was eventually discounted because of access difficulties and general adequacy of the overall employment land available (Employment Land Study KLWN/OTHER_SUPP/004).
- Much of the area to the west of King's Lynn is at flood risk although there are already employment-related uses in and around the village of West Lynn including a significant area of brownfield land with a river frontage. Although West Lynn has issues of connectivity which need to be addressed, and a significant area of brownfield which needs to be brought back into beneficial use expansion into the rural area beyond the village does not offer a sustainable solution.
- Greenfield sites to the east of the town avoiding the flood risk areas found north of the A47(T) cannot be integrated with, nor support an existing settlement.

2.3 Downham Market – Urban expansion

- The suggested direction of growth east of Downham Market reflects a combination of accessibility to the existing town centre and A10 together with recognition of potential impact upon the landscape. To the south-east land generally falls away from the A10 settling in a natural bowl which restricts extensive views. The land rises further north towards a plateau at the former Bexwell airfield which offers little scope for mitigation of new development. Further north still, approaching Wimbotsham there is a greater need to mitigate impact upon the landscape.
- Moving west the lower lying land either side of the Relief Channel is subject to flood risk; whilst any development south of the town would be essentially divorced by the A1122D suffer connectivity issues with the town centre and associated facilities.

2.4 Downham Market – Employment expansion

- To the north of Downham Market is largely residential, and landowners are seeking further residential expansion. There is also concern at the proximity of the village of Wimbotsham and the implications of these two settlements merging. Employment expansion would be out of character and have a detrimental impact on the landscape to the north of the town.
- Beyond the west of the town is Bexwell where there are two existing employment estates located. The Employment Land Study (KLWN/OTHER_SUPP/004) discusses the nature and potential of these. There is also a planning consent for a business park, hotel, leisure centre and golf course which has been implemented in part (2/89/3306/O). This site is available for development and there would be no further benefit in allocating any land as sufficient is available. The Council do not consider that this is the most sustainable location for employment related development for the town, although it already offers opportunities should the market exist.

2.5 Hunstanton – Urban expansion

- To the west of Hunstanton is the coastline and the Wash.

- To the north of the town is where Hunstanton borders the village of Old Hunstanton. Currently there is a distinct barrier of a pitch and putt golf course to the west of the A149, and a much larger buffer of agricultural land to the east of this road which separates the settlements. The Council believes it is important to retain the distinction between these settlements and protect their individual character and identity. Furthermore the agricultural land to the north east of the town is not available for development, and borders the visually and environmentally sensitive AONB.
- South west of Hunstanton there are not any available sites of sufficient size as much of the land use is tourism / holiday accommodation related. Further south a golf course separates Hunstanton and the village of Heacham.
- The town centre does have opportunities to regenerate sites for residential / mixed use developments. Again these sites are not of sufficient size to be a strategic allocation for the town.

2.6 Hunstanton – Employment expansion

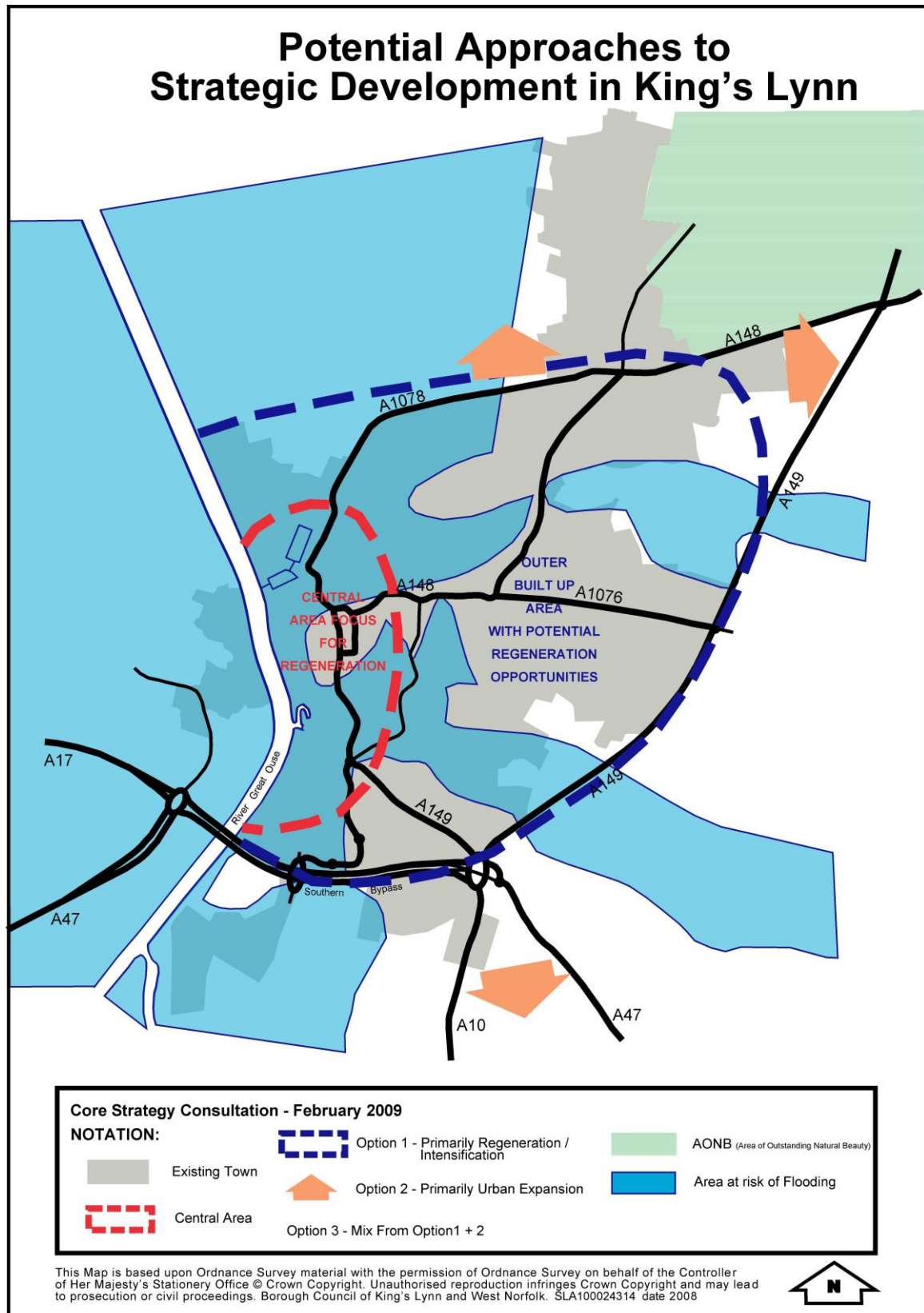
- A development of employment-related uses to the north of Hunstanton would have a significant impact on the valuable landscape, in an area of residential uses and agricultural land.
- Land towards the west of the town and towards the south west is largely holiday accommodation and tourism uses, and at this present time the Council is not aware of any land available for employment uses. It would be the Council's preference that any development in this part of the town would seek to improve and enhance the tourism offer.
- Similarly the town centre may not be suitable for some employment related uses. However there may be smaller sites available if there is demand for appropriate employment-generating development in this location to regenerate the town centre and improve the offer.

3.0 Conclusions

- 3.1 The Council has briefly outlined above the reasons for each of the general locations for employment and urban expansion in the main towns. The statement then goes on to outline any reasonable and realistic alternatives to these locations, and provides a brief summary of the issues around why these were rejected.

Appendix 1: Flood Risk in King's Lynn

This diagram is taken from Core Strategy Regulation 25 document (KLWN/CORE/005) and indicates the flooding constraints on the town.



Appendix 2: Supporting correspondence relating to Urban Expansion in Hunstanton.