



**Representation Form**

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20<sup>th</sup> October 2023**

**Part A**

**Section 1: Personal Details**

<b>Title:</b>	Mr
<b>First Name:</b>	Martin
<b>Last Name:</b>	Tate
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	Castle Acre Parish Council
<b>Address:</b>	[REDACTED]
<b>Postcode:</b>	[REDACTED]
<b>Telephone:</b>	[REDACTED]
<b>Email:</b>	[REDACTED]

**Section 2: Agent Details (if applicable)**

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	N/A
<b>Address:</b>	N/A
<b>Postcode:</b>	N/A
<b>Telephone number:</b>	N/A
<b>Email:</b>	N/A

## Part B

Please fill in a separate form for each document

### Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F47	Topic Paper Spatial Strategy and Settlement Hierarchy	<b>A).</b> 4.1.14. page.27 <b>B).</b> page.41(Reg 19) <b>C).</b> page.43. <b>D).</b> page.83(Table 2) <b>E).</b> page 45 (Tier 4)

#### Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

#### **A). F47. Page 27, LP01. 4.1.14**

CAPC object about the removal of the following protective assurance:

“That the best use of land is achieved but that this should **not be at the expense of other considerations such as the provision of open space, and local amenity considerations** and clearly demonstrate how additional units could be accommodated **without detriment to the locality**”.

CAPC are concerned because Castle Acre’s village character and setting, resident amenity and safety have already been impacted on by inappropriate development moving towards expansion similar to urbanisation in towns. This, when combined with excessive tourism, a lack of parking facility, inappropriate road infrastructure, poor highway maintenance and inappropriate road usage (especially at the ford on South Acre Road) adds further to the problems the village and its residents have to cope with.

In Document F37 Draft Schedule of Main Modifications, 5th Jan 2023 (to be consulted on later in the process of review) the Borough state the following in MM page 28 section 4.

#### **Policy LP01.**

1. The Spatial Strategy seeks to strike a **balance between protecting the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.**
2. Development Priorities; e.g.
  - e. **Protect and enhance the heritage, cultural and environmental assets.**
8. **Rural and Coastal Areas.** (Page. 28 )  
The strategy for rural areas will;
  - ii. Ensure viable, strong, diverse, economic and agricultural activity, **whilst maintaining local character, historic environment and high quality environment.**

- **iv).** ....The strategy will be to **conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, historic environment and wildlife,** and its natural resources **to be enjoyed by all.**

CAPC agree with the Policy LP01 in principle especially those aspects emboldened and underlined above.

However Castle Acre village, it's character, it's Conservation Area, the historic landscape and the surrounding environment are already under threat from high levels of tourism, littering, dog walking, increased vehicle movements and lack of parking facility leading to 'on street parking'. It's designation as a KRSC and the potential for a greater amount of development than that of a Rural Village will exacerbate this problem even further as evidenced by the most recent development on site G22.1. New houses that have been built at the edge of the village and impact on views to and from the Conservation Area, especially a Grade II listed building (the Stone Barn) and are causing parking on the pavement and verges at the northern entry to the village which presents a greater risk to road users and walkers.

The increase of visitors and residents over recent years in Castle Acre has had a negative impact on the walks along the River Nar (SSSI) and in the countryside surrounding Castle Acre. They are frequently used by dog walkers, tourists and those following leisure pursuits. In itself this is commendable but unfortunately users of the pathways frequently leave litter, encroach on the River Nar SSSI, don't remove dog excrement and allow their dogs to enter/invoke natural habitats with a potential negative impact on the resident wildlife. The Parish Council is constantly having to address these issues and does not feel that the aspects supported by CAPC in Policy LP01 (or the current Core Strategy) highlighted above are working effectively.

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### **B). F47 page 41 (Reg 19)**

CAPC agree with the introduction to Policy LP01 Spatial Strategy, which states;

#### **Introduction**

.....Outside of these areas, the Borough's smaller communities vary in size, accessibility, character, constraints and opportunities. The impact upon infrastructure capacity and the ability for rural settlements to expand to accommodate the needs generated by new development also varies. The spatial strategy recognises that settlements within the rural area should be allowed to grow appropriately to maintain rural vitality. Policies LP02 and LP18-LP21 ensure that this growth is sensitive to place, ensuring that each rural community retains its identity and distinctiveness, built form and character, and is in keeping with each settlement's size, scale of services and infrastructure capacity.

CAPC believe the Borough perspective is/appears sound for rural areas but the determined adherence to a Settlement Hierarchy scoring system that takes no account of infrastructure capacity, conservation areas, village character (distinctiveness) works against many of the stated objectives and in the case of Castle Acre the appeal of a rural historic village is being seriously eroded. Growth in Castle Acre is not "sensitive to place", it is primarily proportionate to the KRSC allocation and Borough's housing requirement and not the needs of the settlement in terms of housing need or sensitivity to place

The approach to the scoring system used appears to be seriously 'blinkered' and as the most recent changes demonstrate the system is not fully transparent. There was no consultation with communities before the changes were made/proposed and there are in fact some errors which affect the scoring for a particular settlement. For example; West Acre has a library service and a Village Hall (although the business/charity aspect of the hall may have ceased) and the fact that the scoring system fails to acknowledge this could mean it potentially places extra focus on

neighbouring qualifying settlements with a low score and no doctor's surgery to be designated as a KRSC.

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**C). F47 page 43.**

**Creation of a Settlement Hierarchy. (Policy LP01)**

CAPC object to the accuracy and viability of the following bullet points as stated below; The settlement hierarchy provides a framework to enable the distribution of the borough's growth in accordance with the spatial strategy. Each Tier of the hierarchy reflects the settlement/area's role, including:

- the range of services present; (yes, but not necessarily accurately)
- proximity and functional relationships between settlements (no, not transparent. What about Swaffham 4 miles away, although it is in Breckland its functional relationship to Castle Acre ought to be considered as it provides a very high level of significant service/amenity)
- their accessibility by public transport (**yes and no**, for what purpose? Criteria for this have frequently changed as amendments have been made to the scoring criteria over a number of years. E.g. a bus service 'suitable for travel to work' has been removed. Additionally the service to and from Castle Acre is very limited and the times of the services and distance of the settlement from major towns mean residents prioritise car use as do tourists and visitors.
- their infrastructure capacity (no, there is no evidence of a site visit to Castle Acre to assess infrastructure capacity especially during peak tourist season and weekends especially when there is an event in the village. This is despite previous representation by the village at the pre-submission stage, Sept '21).
- Their ability to expand sustainably to accommodate the needs generated by new development. (no, there is space around the village that could accommodate building/development albeit that it is likely to be detrimental to the character of the rural setting and character of the historic conservation village, but the road network in Castle Acre, much of which is based on the medieval/historic village layout does not accord with current highways standards and is therefore unsuitable for further expansion).

Many of the services scored in the Settlement Hierarchy attract more traffic and traffic movements to the village;

- a. the Village Hall/Community Hall,
- b. the Place of Worship,
- c. the Convenience Store/Post Office,
- d. the Primary School,
- e. the Pub/Restaurant,
- f. other Shops (e.g. the fish and chip shop, the antique shop)

Although the village has these services their accessibility is already adversely affected by tourist and visitor attractions in the village most of which cannot be accessed other than via very narrow single track roads.

CAPC as stated previously do not believe that many of the objectives of the Spatial Strategy are met through the Settlement Hierarchy in relation to Castle Acre, it is a unique settlement and requires more focussed consideration. The scoring criteria used to allocate a settlements position are too restrictive in their focus and in the case of Castle Acre, designated as a KRSC, other considerations ought to be made to ensure the retention of the rural village, its historic character,

the conservation area, the surrounding environment as well as the protection of resident amenity.

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**D). Table 2. Housing Requirement to 2039 by Designated Neighbourhood Areas. (F47 page 83)**

The C.A Housing Requirement indicated in Table 2 (d-a-b. = 11) is not in accord with the made Neighbourhood Plan. Castle Acre's Neighbourhood Plan was made in February 2022. During the development of the Plan the Neighbourhood Plan Steering Group consulted with the BCKLWN Planning Department. The Borough advice during this process was as follows;

*"For communities which are preparing a Neighbourhood Plan for their Area, Such as Castle Acre, the Local Plan review does not seek to make further allocations but instead provides a housing number to work towards (5 new homes) and leaves the process of site selection and allocation to the Parish Council, and their steering group, through the Neighbourhood Plan."* **(Letter from A. Gomm BCKLWN 09 February 2020).**

The content of paragraphs 18, 19 & 20 (F47 Page 84) explain the relevant Guidelines of the NPPF regarding the provision of an indicative housing figure by the Council. The figure provided by the Borough Council in 2020 was in accord with the objectives of the Neighbourhood Plan but this current increase (via windfall) does not consider the impact on the village of Castle Acre with the lack of suitable road and parking infrastructure. Castle Acre also commissioned a Housing Needs Assessment whilst developing the Neighbourhood Plan and this alongside the objectives stated in LP01. F47;

- ...seeks to strike a balance between protecting the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.
- ...Protect and enhance the heritage, cultural and environmental assets.
- Ensure viable, strong, diverse, economic and agricultural activity, whilst maintaining local character, historic environment and high quality environment.
- ....The strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, historic environment and wildlife, and its natural resources to be enjoyed by all.

...indicates that the Housing Need figure for Castle Acre (Table 2 Housing Requirement to 2039 by Designated Neighbourhood Areas) does not consider Castle Acre's local housing need or the protection of the Neighbourhood Area's assets. These Neighbourhood Area priorities are not been considered/balanced against the scoring system of the Settlement Hierarchy.

The size of village/settlement seems to be determined by population alone which doesn't mean infrastructure is capable to meet the needs of increased dwellings (roads in particular) or that development will not significantly affect the character of the settlement or its surroundings.

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**E). (F47, page 45)**

**Tier 4: Key Rural Service Centres**

"These are considered the most sustainable villages outside the urban area. They are large enough to sustain a range of local facilities."

CAPC do not agree with the assumption that because a settlement has a particular number of residents and a particular range of facilities that it then has the capacity to expand/accommodate growth levels determined its position/allocation within the Settlement Hierarchy system.

In short; what Castle Acre has now does not mean it can/should accommodate growth which impacts on the character of a rural and historic village, its resident amenity and potentially the surrounding environment, habitats and wildlife.

CAPC also believe that the balance of the criteria used within the scoring system is not realistic in terms of important village service.

Castle Acre does not have the KRSC preferred G.P Service. This means most residents travel, usually by car, to Swaffham or Great Massingham. However it scores highly enough within the system used because it has;

- a Mobile Library, as do a number the surrounding villages which Castle Acre’s KRSC status is meant to provide for,
- Other Stores such as an Antique and Flower Shop both of which are not considered to be a necessary service for the village itself or surrounding settlements.
- A Pub/Restaurant (X2) both of which have limited opening times to the extent that there are a number of days a week when neither is open.

In summary: Unfortunately it appears that via the scoring system used, a flower shop, an antique shop and a once every 4 week mobile library service are more important than a G.P Service for a village with an elderly population. According to the 2021 census the population of Castle Acre is 862, 504 of whom are above the age of 50.

The scoring System does not offer a good balance of “services and facilities which help meet the day-day need of their residents.”

**Please note** you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

**Section 4: Examination Hearings**

**This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)**

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the examination hearing

**Section 5: Data Protection**

**Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?**

Schedule of Main Modifications stage (following hearings)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of Inspector’s Report	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Adoption of Local Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

*In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King’s Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council’s website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.*

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at [lpr@west-norfolk.gov.uk](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.

### Section 6: Signature and Date of Representation

Please sign and date below:	
<b>Signature:</b> (electronic signatures are acceptable)	
<b>Date:</b>	<b>20/10/2023.</b>

Please note that, to be considered, your representation will need to be received by **11:59pm** on **Friday, 20<sup>th</sup> October 2023**.