

# **Kings Lynn & West Norfolk Local Plan Review Examination Hearing Position Statement relating to Matter 2: Spatial Strategy & Settlement Hierarchy**

**Date of Hearing: March 26<sup>th</sup> – 27<sup>th</sup> 2024**

**Submitted by Castle Acre Parish Council.**

## **Introduction:**

Castle Acre Parish Council has made previous representations to the;

- Local Plan Review Consultation Pre-Submission (2021), and;
- Post submission, pre-hearing examination (March 2022 - December 2022).
- Consultation on additional evidence base documents, September 2023)

The main focus of the representations is that the character of Castle Acre is not properly considered within the Settlement Hierarchy allocations and that its capacity to accommodate more development without negative impact is not considered either and that this is and has been damaging to the village character.

The Borough's response to CAPC consultation representation on Additional Evidence Based Documents appears to be contradictory to Plan Policy

## **The Borough Response states:**

The status of Castle Acre in the settlement hierarchy is not related to existing pressures/ issues affecting the village. Instead, the KRSC designation recognises the role of Castle Acre as a local service hub. This is borne out in the findings set out in Appendix 1 [F47a].

It does not mean there is necessarily capacity to accommodate significant further development, as any proposals would need to recognise and overcome existing constraints; e.g. highways, designated heritage assets etc.

The apparent Contradiction appears in

### **A). Plan Modifications Policy LP01 (F47 p.43)**

The distribution of growth has been informed by the settlement hierarchy:

- determining the overall level of growth for the Borough; and
- distribution of growth within individual tiers of the settlement hierarchy.

### **B). Tier 4: Key Rural Service Centres (F47. P45)**

Creation of a Settlement Hierarchy 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;
- proximity and functional relationships between settlements;
- their accessibility by public transport;
- their infrastructure capacity; and
- their ability to expand sustainably to accommodate the needs generated by new development.

## **Context:**

Castle Acre is a historic rural village with the first Conservation Area allocation in Norfolk (1971). It also has an SSSI (the River Nar chalk stream) and a number of Scheduled Monuments and Grade 1 listed buildings which are;

- a Norman Castle and its defences
- a Cluniac Benedictine Priory of St Mary and St Peter and St Paul

- the remains of the Cluniac Priory Gatehouse
- a Bailey Gate and;

a further 19 nationally Listed Buildings identified for their national importance by Historic England.

Castle Acre is a popular tourist attraction and is used by many visitors to pursue their leisure interests, eg, rambling, dog walking, off roading, etc. In addition to the increased visitor traffic the K.R.S.C allocation within the Settlement Hierarchy adds to the associated problems generated by large numbers of vehicles in a village with many narrow roads, very limited, poorly accessible parking facility and the location of the Bailey Gate on a narrow street has already led to damage by vehicles to a scheduled monument on more than one occasion. These issues impact considerably on resident safety, amenity and character of the conservation Area. The increase in Holiday Lets, Second and Holiday Homes is also impacting on the character of the village.

### **Additional Question answers**

**AQ4 “Is the revised Settlement Hierarchy in the proposed New Policy, set out in the Spatial Strategy and Settlement Hierarchy Topic Paper [F47], justified as appropriate, based on proportionate evidence?”**

**Response:** CAPC believe the revised Settlement Hierarchy in the New Policy is seriously flawed and that the “proportionate evidence” supplied by the process does not provide sufficient evidence to make Settlement Hierarchy allocations when Conservation Areas, SSSIs and Scheduled Monuments are involved alongside the impact of high levels of tourism.

The results of the Borough’s settlement assessments visits in June 2023 alongside the desk based studies carried out were not shared with the Parish Council nor were the Council consulted about the services within the village hence CAPC are not aware of the “Other Stores” or “Other Employment or Business” being referred to in Document F47a. This unfortunately has not been a transparent process.

As stated in CA’s submission to F47a, Consultation on Additional Evidence Base, there are some errors in the scores allocated and although some of the Criteria Headings in **F47a** have changed from those in the Further Consideration of the Settlement Hierarchy **Appendix 1 – Study Results Table**, the scoring criteria for Hierarchy Allocation has not changed; examples of this relating to Castle Acre can be seen at the end of this Hearing Position Statement document in;

**[Appendix 1. Further Consideration of the Settlement Hierarchy scoring vs F47A Scoring System.](#)**

Additionally while the reasons for changes to score allocations for Bus Service opposed to Bus Routes have been clearly explained in F47a the changes to scores for Post Offices and Libraries have not been made clear in F47a, again this does not lead to transparency.

In relation to the number based scoring system for the Settlement Hierarchy, especially for KRSC’s there are some key issues that are not addressed in the scoring and allocation process. Some of the criteria need to be more focussed on the needs of settlement’s residents and those residents of the surrounding settlements e.g.

1. Does the Bus Service facilitate travel to and from work/commuting? Castle Acre’s Bus service is not suitable for travel to and from work and its suitability for travelling for shopping purposes to Swaffham is also very limited despite the fact it scores 2 with two arrivals and two departures a day. Due to the very limited service most visitors to Castle Acre use motor vehicles thus contributing further to parking issues, air pollution and negative impact on the village character and resident amenity.

2. Why is the lack of a G.P. Surgery in a settlement with a high age demographic (58.5% of Castle Acre's population are over the age of 50, 43% over the age of 60) not being recorded as an essential service rather than a preferred service? This is very questionable when a Mobile Library service once a month is counted as a positive attribute for Castle Acre's K.R.S.C allocation despite the fact that the vehicle itself impacts on the Conservation Area when parked on Stocks Green and is not readily available to a number of children due to the time schedules clashing with school hours and travel time.

The scoring of Other Stores and Pubs/Restaurants does not address their essential value to the local and surrounding community. How important to a rural village is a 2<sup>nd</sup> hand book shop open 1 day a week and an Antique shop open 3 days a week 10am-4pm (Thurs-Sat) 1 day a week 11am-5pm (Sun)? It should also be noted that the Antiques Shop in Castle Acre is closing down in March 2024.

3. How good is the service offered by Pubs/Restaurants which focus their winter business on visitors and tourists usually over the weekend? The tearoom 10am-3pm (Fri- Sat). At the time of writing the Pub is closed and has been since New Year. Prior to closure it was only open for limited hours and a limited number of days a week due to the focus on visitors and tourism.
4. It is interesting to note that West Acre, a neighbouring Settlement to Castle Acre and classified as a Rural Village in the Settlement Hierarchy actually offers a considerable amount more than Castle Acre to the Neighbouring Communities, e.g.
  - 1) a Pub/Restaurant,
  - 2) a Garden Centre with a cafe,
  - 3) a Theatre with Exhibition Space and regular workshops,
  - 4) a Brewery with a shop and Tap Days,
  - 5) an Art Gallery.

Although the village does not meet the essential criteria for a KRSC the quality of its amenity is not reflected in the scoring system.

Castle Acre Parish Council believe that the system of scoring used to determine allocations within the Settlement Hierarchy should be more wholistic and assess a settlement's capacity to accommodate further development without:

- damage to the surrounding Natural Environment;
- damage to designated and non-designated Historic Assets;
- impacting negatively on SSSIs and Wildlife Habitats;
- affecting the character of the settlement or the Conservation Area.

The system should in the opinion of Castle Acre Parish Council, also consider/assess the following;

1. whether the transport and road infrastructure can handle the increase in traffic caused by further development, and;
2. whether further development will generate an area of urban sprawl which is particularly damaging to the character of Rural Villages and the character of Conservation Areas.

**AQ5** "Should the Spatial Strategy, as proposed to be revised in the New Policy, provide for more growth at Downham Market given its status as a Main Town and its accessibility by public transport?"

**Response: Yes.** CAPC believe that growth should, as much as possible, be targeted at settlements in the higher tiers of the Settlement Hierarchy to relieve the pressure to make allocations in Rural Settlements.

**AQ11** Is the proposed New Policy LP02 on Residential Development on Windfall sites within and adjacent to Rural Settlements positively prepared, justified, effective and consistent with national policy in promoting sustainable development in rural areas and maintaining the vitality of rural communities as part of the spatial strategy for the Borough? In particular:

**(b).** Is it clear in criterion 1e “It results in high quality sustainable schemes which is appropriate to its context and makes a positive contribution to the local environment and landscape setting”, what is meant by ‘high quality sustainable schemes which is appropriate to its context’?

**RESPONSE:** CAPC believe it is not clear. A recent renovation within the Castle Acre Development Boundary has not properly taken account of the impact of new build on the Conservation Area. The Chief Conservation Officer at the time visited the site with parish councillors after the completion of the build and stated “It’s a good quality build but in the wrong place”. This indicates that the new build/renovation was not appropriate to context i.e. it impacted negatively on the Conservation Area..

**(c).** Is the wording of criterion 1g) consistent with paragraph 111 of the NPPF in preventing residential development that would result in ‘significant adverse cumulative impacts (such as highway impacts)’?

**RESPONSE:** A recent development G22.1 in Castle Acre has impacted on road safety. There are an increased number of vehicles parking on the approach road to the village and the pavement as well as the grass verge beyond the pavement. The access road to the new development has also increased the risk of collision as the 200 metre stretch of road where it is located and where many motorists exceed the speed limit now has 4 junctions and 5 property access drives on it.

**(d).** Is part 2 of the policy justified in only supporting residential development outside of rural settlements ‘in exceptional circumstances’? Is it clear what ‘exceptional circumstances’ means in the context of the policy and would it be evident how a decision maker should react to such development proposals?

**RESPONSE.** Castle Acre P.C believe that criteria for part 2. Development Outside Development Boundaries should also include the criteria in part 1 Development within Development Boundaries of the Policy. CAPC understand that the “exceptional circumstances” are where there are no sites available within the Settlement Boundary.

**(e).** Is part 2 of the policy justified in applying strict limits of 10, 5 and 2 dwellings to developments outside the boundaries of KRSCs, RVs and SVHs, respectively? What is the proportionate evidence to justify these dwelling numbers?

**RESPONSE:** Castle Acre P.C believe that the impact of development on the character of the village is more significant than the actual number of dwellings and that dwelling numbers should reflect the housing need.

**(f).** Is the wording of criterion 2e) clear and effective in preventing development which does not lead to impacts on local character? Would this criterion duplicate criteria in part 1 of the policy?

**RESPONSE:** The Principle behind criteria 2e is sound and supports the consideration of existing development (buildings) and the cumulative impacts alongside the new development and not just the effect of the emerging development on local character.

## Appendix 1. Further Consideration of the Settlement Hierarchy scoring vs F47A Scoring System.

Settlement Service	Further Consideration of the Settlement Hierarchy (Pre Plan Submission)	F47a (Sept 2023)	Reasons for variations between Documents and Notes
G.P Surgery	X	X	A preferred but not a qualifying Service. Given the age profile of Castle Acres population is a more important qualifying service than a mobile Library which actually visits once a month and clashes with School times (including travel to and from).
Bus Route	1	Category not included in this document/scoring system	The Score simply acknowledges that the village is on a Bus Route
Bus Service	Category not included in this document scoring system	2	Frequency of Service grading; 3 for an hourly or more frequent service; 2 for less than hourly but more than 4x a day; 1 for less than 4x a day).
Primary School	1	1	
Convenience Store	Category not included in this document scoring system	1	
Shops	2	Category not included in this document/scoring system	The score in the Further Consideration probably includes the Convenience Store in the 2 allocated, so one other shop?
Other Stores	Category not included in this document scoring system	2	These are stores additional to the Convenience Store but they are not Identified (Lack of Transparency)
Post Office	1	2	The number increase doesn't affect the overall score, it simply indicates that the service is permanent not Mobile
Community Hall	1	1	
Library	1	1	The score of 1 in F47a indicates the library is Mobile. A score of 2 would define it as Permanent
Place of Worship	1	1	
Pub/Restaurant	1	2	2 = Ostrich (Pub) & Wittles (Tea room)
Playing Field	1	1	
Other Employment or business	0	2	This employment/Business is not identified (Lack of Transparency)
Service Score	Category not included in this document scoring system	11	This Total indicates the number of Services the village has not the actual number of facilities, e.g. shops, pubs, etc.
Totals	10	Category not included in this document/scoring system	The Total score represents the number of facilities, outlets, etc.

**NOTE:** The qualifying score of 10 or more for K.R.S.C. has not been adjusted although the categories have been altered. For example including Convenience Store independently of Shops increase CA's score by 1 whilst the inclusion of scoring provision (previously 0) within Other Employment category increases CAs score by 1 and we have not been made aware of what employment/business is being included. (Lack of Transparency)