

HUNSTANTON & DISTRICT CIVIC SOCIETY

Website www.hunstanton-civic-society.org

Charity Registered Number 1101087

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20 February 2015

Geoff Hall
Executive Director, Development and Regeneration Services
Borough Council of King's Lynn & West Norfolk
King's Court
King's Lynn
PE30 1HX

Dear Mr Hall

Re BCKLWN Consultation – Site Allocations and Development Management Policies Pre-Submission Document 2015

This letter summarises the Civic Society's response to the above document. Our views in detail have been entered on the planning portal website.

We have been fully engaged with this consultation process and have previously submitted comments on the draft Site Allocations Plan (2009 and 2011) and the 'Detailed Policies and Sites Plan' (2013).

Development Management Policies

We generally support policies: **DM4, DM8, DM9, DM10, DM11, DM12, DM13, DM15, DM16, DM17, DM18, DM19** and **DM20** which we consider to be of interest to people in Hunstanton and District, but draw attention to the following points:

- We regret that **DM8** does not promote the provision of affordable housing as generously as neighbouring authorities, which require a higher proportion per development.
- We note the importance of **DM12**, the adoption of the A149 as part of the Strategic Road Network.
- Whilst supporting Policy **DM13** to protect and exploit as a green corridor the former railway line from King's Lynn to Hunstanton, we would add that where obstructions to the original track bed have been permitted that adjoining land be given protection so that it would be feasible to construct diversions around such obstructions.
- We request that further consideration be given in **DM13** to reinstating the protection of the former line from Watlington to Wisbech, and to extend protection to include the line from Heacham to Wells.
- Whilst welcoming the robust arrangements for the management and future maintenance of recreational open space in **DM16**, we suggest that the phrase 'unless this would cause the development to be financially unviable' in paragraph 16.1 is sufficiently vague as to be exploited by potential developers.
- We would ask that a degree of discretion be used in applying the seven criteria to applications for replacement dwellings in **DM18**.

Settlements and Sites – Allocations & Policies: Hunstanton

Our view of the preferred sites for future development in the town has not changed from the position set out in the draft document, which we supported, and we remain of the opinion that the site to the south of the town, **F2.4**, is not suitable for large-scale development. Further:

- We ask for some clarification for the significant increase in the allocation for Hunstanton from the previous 'at least 220' to the current figure of 333 new dwellings.
- The range of densities of proposed developments across the borough requires further explanation. Substantial developments vary from 10 dwellings per hectare in Downham Market to 33 per hectare in King's Lynn. In particular we note that the proposed development in Hunstanton on site **F2.2** gives a density of 19 dwellings per hectare whilst on site **F2.4** it is 26 dwellings per hectare. This difference makes a significant impact on the allocations for each site.
- We ask it to be noted that access to site **F2.4** need not involve a bridge to cross the tributary of the Heacham River (access could be from the town) and access by a roundabout on the A149 would be in contravention of Policy **DM12** and cause an unwelcome interruption to the traffic flow on this part of the Strategic Road network.
- We would like the Shopfront Guide, Hunstanton (Sept 2008) to be referenced in Policy **F2.1**.
- We request consideration be given to an access from the roundabout at the top of Redgate Hill to the proposed site **F2.3** which could extend to Smithdon High School and ease the access to that site.

Finally we would note that some of the proposed developments elsewhere in the borough will have a significant impact on congestion on the Strategic Road network. We invite the planners to consider the sustainability of the overall plan and the way it may influence the decision of people in our hinterland to visit the coastal resorts.

Yours sincerely

Andrew Murray
Chairman