

MADDOX PLANNING

Planning Policy Team
Borough Council of Kings Lynn and West Norfolk

02/10/2024

Kings Lynn and West Norfolk Local Plan Examination: Consultation on Main Modifications

This letter is submitted in response to the Kings Lynn and West Norfolk Local Plan Main Modifications Consultation undertaken by Kings Lynn and West Norfolk Council ('BCKLWN'). Our comments are made on behalf of Metacre Limited, who has submitted an application for outline planning permission for up to 500 homes with flexible commercial floorspace, associated landscaping, parking and supporting infrastructure on land at West Winch (18/02289/OM).

The comments within this letter focus on the Main Modifications proposed to Policy E2.1 West Winch Growth Area. We continue to fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole and Metacre Limited reiterates its desire to see the site delivered with the aspiration of the outline application being approved in late 2024. Notwithstanding this, we object to the proposed modifications made to the proposed Policy particularly in relation to the inclusion of a 'West Winch Growth Area Heritage Buffer Concept Plan'.

Proposed Modification MM122

MM122 sets out that a new paragraph will be added to the Policy (E2.1) to set out that '*Historic England and the Borough Council have identified suitable buffer areas, (based on heritage impact assessment, site visits, and professional judgment) around the Church of St Mary and moat, which should be kept free of development in order to preserve the settings of those heritage assets. These areas are shown on the Heritage Buffer Zone Concept Plan.*'

St Mary's Church, the Medieval moat and the barns at Manor Farm form a group of heritage assets. These provide an understanding and appreciation of part of the former Medieval landscape although this has been impacted by changes and development in the landscape from the post-medieval period onwards. It is acknowledged that the development proposals will affect the significance of the group of assets and that it is almost impossible to fully mitigate the impact on rural views, which is an important part of this significance.

However, the proposed heritage buffer does not align with the land use arrangement shown on the Framework Masterplan in the West Winch Growth Framework Masterplan Area SPD adopted 26 January 2023. The framework ensure that a comprehensive and cohesive approach is taken to development across the West Winch Growth Area. The scale of the heritage buffer zone directly conflicts with the cohesive approach that is sought within the Framework.

The proposed buffer, which is circa 200-300m to the south, 75m to the east and 140m to the west and 170m to the north, and comprising land which is to have no clear recreational function is not appropriate for the creation of a cohesive centre for the village and fundamentally alters the development Masterplan.

Furthermore, St Mary's Church has a very little visibility or visual relationship with the surrounding landscape due to the existing tree cover and surrounding dense vegetation. The moat is in private ownership and surrounded by thick vegetation, and there is very limited visual connection with it from the road or St Mary's Church itself. Given

the limited connection between St Mary's Church, the moat and wider landscape, the scale of the proposed buffer does not appear to be based on a clear rationale.

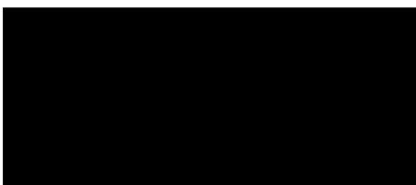
Consequently, on the basis of the proposed heritage buffer plan, it would remove circa 4.5ha of land identified for development within the Masterplan SPD right in the heart of the Growth Area. This has a considerable impact on what has been a clear community-led ambition to re-establish a village heart in West Winch which straddles the A10 and creates a critical mass of community activity. The proposed West Winch Housing Access Road and associated reduction in traffic on the A10 though West Winch is the opportunity to deliver this, changing the character and giving West Winch the connected village heart with active frontages that it is currently missing. This has been a fundamental placemaking principle which has shaped the development of the growth area over the last 10+ years.

We therefore, object to the proposed modification proposed to Policy E2.1 in relation to the introduction of the proposed heritage buffer concept plan as shown within MM122. It is; however, noted that there is benefit to a form of heritage buffer around the moat and St Mary's Church and as such, we propose a buffer to a maximum of 30m around the moat and to 75m to the north and 65m to the west of the church. This also includes the additional buffer of 75m for the cemetery expansion in the north. This proposed buffer is shown in the accompanying indicative Masterplan.

In providing this revised buffer, it will allow for an appreciation and understanding of the historical composition of the assets and part of the medieval landscape. Proposed landscape treatment and management including the removal of trees between the church and the moat will secure some enhancement and will better reveal the assets and their association. This combined with greater accessibility and heritage interpretation will positively contribute to the ability to appreciate, experience, interpret and understand this small but significant part of a medieval landscape. In addition to this, landscape management of the buffer will aid in the protection, conservation and management of the assets. This in combination will better reveal the significance of the landscape and will aid in a scheme that re-establishes the village centre. This could not be achieved with a buffer of up to 200m-300m as it would provide a significant disconnection between the historical assets, the existing village and wider Masterplan development.

We look forward to receiving confirmation that our representations have been considered and the proposed wording to the Main Modification has been updated to reflect the heritage buffer shown within the accompanying Masterplan.

Yours sincerely



Matt Hill
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