

2 April 2026

Dear Planning,

26/00366/OM| Outline application for residential development comprising 31 dwellings, with all matters reserved except access | Land Rear of 50 To 54 Common Road Snettisham Norfolk

As Parish Clerk for Snettisham, I respond to your formal statutory consultation on behalf of Snettisham Parish Council to register its objection to the above proposed outline application.

As this is outline only, I have not dealt with detailed issues that may be of concern as reserved matters. I will only therefore refer to relevant policies at this time. I refer to the following policies set out in blue text as relevant to this application, or screen shots (pages 1-7 inclusive). I would request the planning officer to consider these policies in the light of our objections. Our objections, are pages 8-12 inclusive.

National Planning Policy Framework

Annex 1 para 231

The policies in the NPPF are material considerations which should be taken into account in dealing with applications.

Considering development proposals

115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

117. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximizes the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

Achieving appropriate densities

129. Planning policies and decisions should support development that makes efficient use of land, taking into account:

- (a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- (b) local market conditions and viability;
- (c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- (d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places.

Achieving well-designed places

135. Planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit...outside of development boundary-

King's Lynn and West Norfolk Local Plan 2021-2040

Policy LP01 - Spatial Strategy and Settlement Hierarchy

Introduction

3.7 In line with National Planning Policy, the spatial strategy for Kings Lynn and West Norfolk seeks to distribute the majority of growth within the most sustainable locations of Kings Lynn, Downham Market and Hunstanton and on the edge of Wisbech, to continue to support their roles as established large settlements.

3.8 This approach makes the most of existing services and facilities, delivering growth to where it is most needed. It also provides associated opportunities to regenerate urban

areas, provide new jobs and new homes in accessible locations, and focus infrastructure improvements where they will have the greatest effect.

3.9 Whilst supporting the continued sustainability of existing settlements, the Plan seeks to promote the establishment of a major sustainable growth area to the south-east of Kings Lynn. As the most significant site allocation over the longer term, the West Winch Growth Area is a focal point for development within the Borough, contributing to supporting housing delivery, increasing the productivity of the local economy, reducing out-commuting, increasing the number and quality of better paid jobs in the Borough and improving accessibility to services for the rural communities.

3.10 Outside of these areas, the Borough's smaller communities vary in size, accessibility, facilities, 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 in order to maintain rural vitality. Policy LP02 – Residential Development on Windfall Sites and Policies 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.

Policy LP02 - Residential Development on Windfall Sites

Introduction

3.48 Windfall development will be an important component of housing growth throughout the Plan period. Its location and scale should reflect the Plan's spatial strategy and settlement hierarchy set out in Policy LP01 – Spatial Strategy and Settlement Hierarchy. Windfall development refers to development which occurs on sites other than those allocated in the development plan.

Residential development within development boundaries

Residential development within the development boundaries of settlements in Tiers 1-6 of the Settlement Hierarchy in Policy LP01 – Spatial Strategy and Settlement Hierarchy, as defined on the Policies Map, will be supported, provided it complies with other relevant policies in the development plan, and meets the following criteria:

- a. It results in a sustainable design of development which respects and enhances local character, contributes to place making and the reinforcement of local distinctiveness, and can be readily assimilated into the settlement in accordance with design and sustainable policies LP18, LP21, LP22;
- b. It has regard to the size, type, tenure and range of housing that supports the needs of communities in accordance with housing policies LP28, LP29, LP30;
- c. It will not cause significant adverse impacts on services and infrastructure, and the local infrastructure is sufficient to accommodate the demands of the development in accordance with Policy LP05; and

- d. Its context makes a positive contribution to the local environment and landscape setting in accordance with environment policies LP06, LP15, LP16, LP19, LP23, LP26;
- e. It does not result in an unacceptable impact on highway safety, or residual, cumulative impacts on the road network which would be severe in accordance with transport Policy LP13; and
- f. The development maximises opportunities to reduce the need to travel and encourages sustainable and active travel modes of transport in accordance with Policy LP13

Residential development outside of development boundaries

Sections 2 & 3

2. In tier 1-4 settlements, as defined by Policy LP01 - Spatial Strategy and Settlement Hierarchy, proposals for new residential development outside of, but adjoining development boundaries, as defined on the Policies Map, will be supported provided they comply with other relevant policies of the development plan, and meet the criteria set out under Part 1 of this Policy, as well as the following criteria:

- a. It respects or enhances the character of the adjoining settlement and countryside, and can be readily assimilated into the existing fabric of the adjoining built up area;
- b. It can be supported by existing and future service and infrastructure provision, or adverse effects can be mitigated through financial contributions towards improving provision;
- c. It is not located within the boundary of the Norfolk Coast National Landscape, and would not adversely affect its setting;
- d. It preserves or enhances the significance of nearby heritage assets and their settings, and protects and enhances the appearance and character of designated and valued landscapes; and
- e. It would maintain the physical separation between existing settlements and protect their identity

3. Residential developments in excess of the following dwelling thresholds outside of, but adjoining, the development boundary must be brought forward as allocations through the Local Plan or Neighbourhood Plans:

King's Lynn	100 dwellings
Downham Market and Wisbech	75 dwellings
Hunstanton	50 dwellings
Settlements adjacent to King's Lynn and Main Towns	25 dwellings
Key Rural Service Centres	25 dwellings

NB- Snettisham is designated a Tier 4 settlement - Key Rural Service Centre.

Policy LP03 - Neighbourhood Plans & Neighbourhood Plan Housing Requirement

3.52 The National Planning Policy Framework requires local planning authorities to provide a housing requirement for designated Neighbourhood Plan areas.

3.53 It is acknowledged that not all Neighbourhood Plan groups will wish to address housing, however the Council's starting point is that Neighbourhood Plan groups should have the opportunity to address housing wherever this is appropriate to the strategy of the Local Plan. Policy LP03 - Neighbourhood Plans therefore provides each Neighbourhood area designated at the time of Plan preparation with a minimum housing number. The methodology used to calculate the housing number is set out in Appendix I – Neighbourhood Plan Housing Requirement and will be used to calculate the housing requirements for future neighbourhood areas.

Policy LP03 – Neighbourhood Plans

1. The Council will support the production of Neighbourhood Plans in identifying appropriate, locally specific policies that are in general conformity with the strategic policies of this Local Plan.
2. Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the minimum housing requirements set out below:

Neighbourhood Plan Area	Minimum Net Housing Requirement	Neighbourhood Plan Area	Minimum Net Housing Requirement	Neighbourhood Plan Area	Minimum Net Housing Requirement
Brancaster	12	Hunstanton	100	South Wootton	134
Burnham Market	11	Ingoldisthorpe	2	Stoke Ferry	8
Burnham Overy	0	Marshland St James	3	Syderstone	1
Castle Acre	4	North Runcton	0	Terrington St John	6
Congham	0	Old Hunstanton	2	Thornham	2
Dersingham	38	Outwell	16	Tilney All Saints	1
Docking	11	North Wootton	73	Tilney St Lawrence	11
Downham Market	473	Pentney	1	Upwell	0
Gayton	12	Ringstead	0	Walpole	13
Great Massingham	7	Roydon	0	Walpole Cross Keys	0
Grimston	15	Sedgeford	0	Watlington	18
Heacham	43	Shouldham	1	West Dereham	0
Holme Next the Sea	0	Snettisham	25	West Winch	92

3. Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on the methodology set out in Appendix I – Neighbourhood Plan Housing Requirement Methodology.

Snettisham Neighbourhood Plan

Policy NP01 – Land is allocated for the development of around 40 dwellings at Poppyfields, as shown in Figure SNP1. The development should be informed by a design-led approach, having regard to local character and residential amenity. Development of the site must provide for access to the local public rights of way network and provide clear signage to indicate access to the public rights of way network and to point out where dog walking would be acceptable within the wider area, and that Dersingham Bog is less suitable for dog walking.

A number greater than 40 will only be supported if there is both convincing evidence that this is necessary to make the development viable, and that the greater number will deliver additional community benefits for Snettisham.

NP02 – Proposals for windfall development in the Neighbourhood Area should demonstrate that:

- **The Provision of access by walking and cycling to local services and facilities in the village via a safe and secure route;**
- **That the proposal will not result in a reduction of the amount of outdoor sport or recreational space, or children's play space;**
- **That the proposal would not result in the loss of a viable employment land.**

NP09 – The enhancement of the public rights of way network, including access to it, will be supported. All development within the Norfolk Coast AONB should protect and enhance the AONB.

Detailed Objections

Housing Requirement

The updated adopted Local Plan minimum housing requirement for Snettisham is 25 homes in over the next 19 years. It should be considered that this is a 19-year plan, and not an immediate requirement for housing development.

Furthermore, 69 homes are currently being built at the Spires Development on Poppyfields Drive. Therefore, there is no new housing actually required.

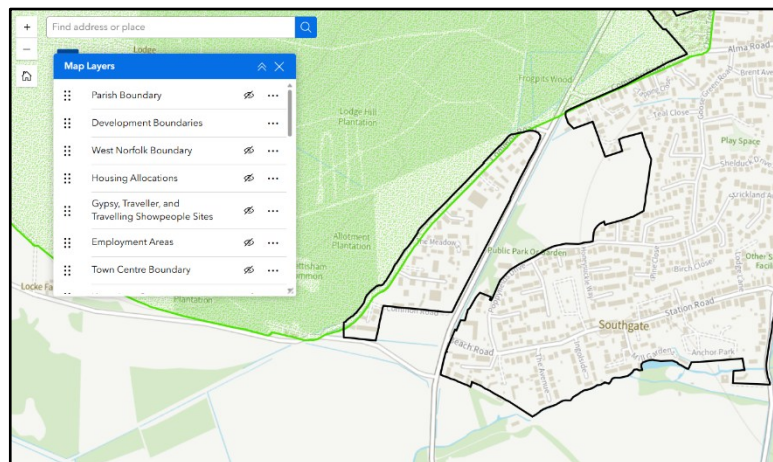
The local market will also demonstrate that new houses in Snettisham have been slow to sell in the recent period.

Snettisham has already far exceeded the housing requirement (*see Snettisham Neighbourhood plan below*).

The proposal should be rejected in light of the fact, housing requirements are already being met.

Local Plan Development Boundary

This development is not within the adopted Local Plan development boundary for Snettisham. No development was intended to take place in this location. Nor is it within the adopted Snettisham Neighbourhood Plan development boundary.



The proposed development outside of the development boundary conflicts with the Local plan
Residential development outside of development boundaries - Sections 2 & 3

Section 2 - It is averred that the development does nothing to enhance the character of the adjoining settlement, other than enhance the size of the village. The proposal is on land previously considered for commercial development only. It is across the A149. Access to the village is for most people realistically a drive away.

It is averred that the development cannot be supported by existing and future service and infrastructure provision- see below on **infrastructure**.

Snettisham is designated a Tier 4 settlement - Key Rural Service Centre.

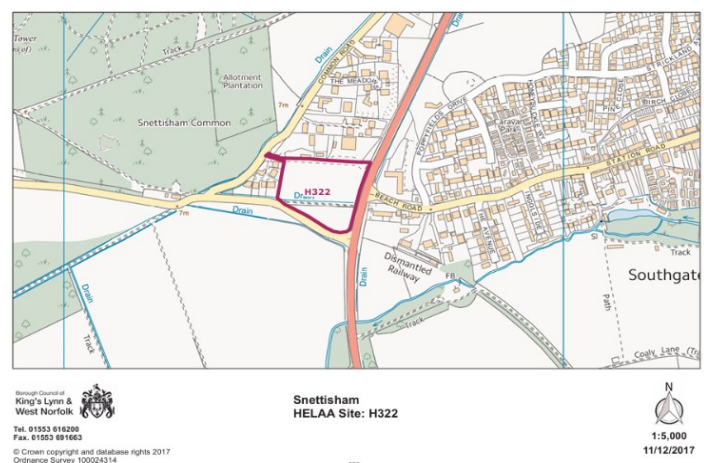
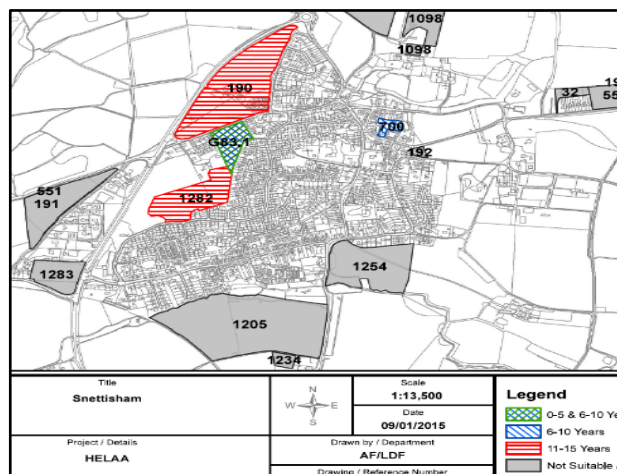
Section 3- requires developments in excess of 25 homes for Rural Services Centres, to be brought forward as allocations, in the Local Plan or the Neighbourhood plan - The development is in excess of 25 homes and is not in the Local plan or the Neighbourhood plan.

If the application is permitted, this will create a precedent for developments to disregard section 3 of the Local Plan and the Neighbourhood Plan. It will also encourage yet further development on other greenfield sites surrounding the village, completely disregarding the wishes of the village to retain its character by controlled, '*planned for*' growth.

Borough Council of King's and West Norfolk Local Plan Review (2016 – 2036): Housing and Economic Land Availability Assessment (HELAA)

The proposed development site was not deemed appropriate within the HELAA

This technical study dismissed allocating this greenfield site for development within the Local Plan as it was deemed unsuitable due to NCC transport and road constraints



Snettisham Neighbourhood Plan 2018-2033 (NP)

This proposed development is contrary to the policies within the adopted Snettisham Neighbourhood Plan.

If the application is permitted it will completely disregard the policies and the intentions behind the Neighbourhood Plan.

The Neighbourhood Plan for Snettisham has specific policies dedicated to housing allocation. **NP01** refers.

The housing requirement under the LDF (*at the time* of the NP), was for **34 dwellings** in Snettisham.

The Neighbourhood Plan agreed a specific allocation on the Poppyfields site (The Spires development by Bennetts (ref 20/00226/OM) of **40** homes. That development is currently underway to build an increased number of **69** homes.

With windfall development in Snettisham at the date of the neighbourhood plan, Snettisham was 150% above the LDF allocation at the time. Since then, there has been yet further development.

The Spires development of 69 homes is additional to other recent developments in Snettisham as follows:-

Development	Number of Dwellings	Build Period
Golden Pheasant Drive	8 homes	2015–2016
Tapping Close	23–24 homes	2016–2017
The Old Coal Yard (Station Road)	14 homes	2016–2017
Railway Sidings (Railway Sidings Yard)	18 homes	2017–2018
Avocet Drive	6 homes	2020–2021
Teal Close	9 bungalows	2021–2022
Carrstone Crescent	4 homes	2023–2024
Home Farm Close	5 homes	2023–2025

Snettisham has therefore already taken way beyond its share of new development in the recent period and way beyond the Housing requirement.

Any further development risks losing Snettisham’s character as a village.

If this development is allowed to expand without regard to the Neighbourhood Plan, this will create a precedent for yet further development on other greenfield sites.

NP02 It is averred that the policy is also not met. This site was previously allocated as suitable for commercial use only. Further the initial Neighbourhood Plan proposal, highlighted this site as a preferred site for commercial development. The west side of the A149 has always been considered as the commercial side of the village. Loss of this land to residential development would not accord with NP02 as it would **“result in the loss of viable employment land”**

If the application is permitted, it will completely disregard the approved Snettisham Neighbourhood Plan. It would make the NP meaningless.

Infrastructure

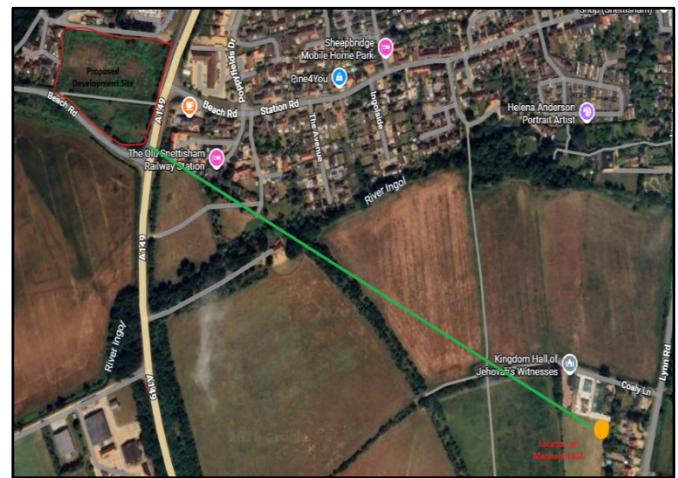
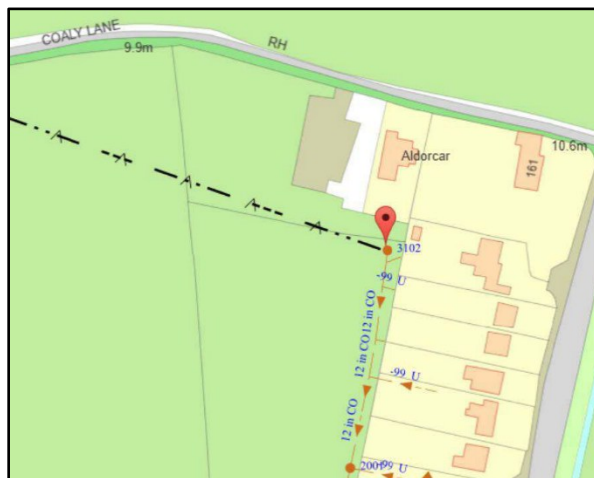
The Parish Council remains concerned that there are not the infrastructure and services to accommodate a development of this scale within the village. Furthermore, the Spires (ref 20/00226/OM) development of 69 houses, will already increase all the existing infrastructure pressures.

Local infrastructure and services, including roads, drainage, healthcare, and parking, are already under strain within our village due to the amount of recent development outlined above. It is averred the village infrastructure issues cannot accommodate any more new homes currently and that the proposal should be rejected.

Drainage

The village has and continues to be plagued by drainage and flooding issues in the village. Anglian Water have publicly stated that they would object to any further development within Snettisham, due to the old water and drainage infrastructure.

The applicant's submission acknowledges that access to foul drainage can only at this time realistically be achieved through access to Manhole 3201 off Coaly Lane, at Ingoldisthorpe, or by onsite Klargester. Does the applicant really consider a foul drainage connection to the Ingoldisthorpe WRC is a commercially viable option.



Traffic, Parking & Transport

This village and Parish Council are currently facing significant parking and traffic issues within the village from existing residents and visitors. The Parish Council has faced these difficulties for some years and have been working with Highways to look for solutions, but with no imminent solutions in sight. The additional traffic from new residents wanting to access the centre of the village for services will significantly exacerbate the issues. Experience shows that people will use their vehicles to visit the village centre, and this site (across the A149 by-pass) is some distance away from the centre. It will encourage car use, despite reference to the suggested use of existing footpaths. Given its location and with 31 new houses, this development will only exacerbate those existing issues.

The applicant is proposing installation of a Toucan crossing a way of mitigating accessibility and achieving a sustainable development. The Parish Council is concerned about the impact on the A149, during those particularly hot days traffic can be queued back to the Beach Road junction. The applicant has not taken account of the potential displacement of traffic through neighbouring villages. The Applicant's assessment does not account for increased seasonal traffic.

Flood Risk

The site is near higher-risk areas and is within updated flood projections that take account of climate change. Its location and proximity to the coast, where there has been historic flooding and coastal erosion, raises concerns about long-term safety.

Environmental Impact

The site is very close to sensitive areas and landscapes. Snettisham Woods includes a rare lowland heath which is on the governments protected habitats inventory. The River Ingol chalk stream is also close by. Development risks harming local habitats and water systems.

Character of Snettisham

Snettisham is not a designated Tier 3 development, its charm and attractiveness are its size and proximity to other local villages, including Ingoldisthorpe. The risk is that if this application outside of the agreed development boundary is approved, the whole character of the village will be changed, with a risk of further windfall schemes coming forward.

Consultation with Parishioners

The Parish Council has consulted with villagers via an online vote. The vote has been conducted over a credible platform, and the form has been locked down after 1 submission from each IP address, to ensure voters do not submit multiple votes.

Between the dates 2 March and the date of this submission 2 April 2026 and 83% of respondents in the village are opposed to the proposed application. 6 % remained neutral and 11 % were in favour.

Conclusion

Overall, the proposal does not accord with several policies within the Local Plan and particularly the Snettisham Neighbourhood Plan. It is also against the wishes of the village expressed in the vote so far and in petitions currently being circulated. The application simply seeks to maximise the development potential of the site and completely disregards the Local Plan and the adopted Neighbourhood Plan.

For all the reasons set out above, the Parish Council urge that this application be rejected.

Yours sincerely

ROBERTA MASON
Parish Clerk