

DOWNHAM MARKET NEIGHBOURHOOD PLAN 2022 – 2042





Prepared by Downham Market Neighbourhood Plan Strategic Group on behalf of Downham Market Town Council with support from:

ABZAG Ltd

NEIGHBOURHOOD PLANNING AND PROJECT MANAGEMENT

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Forward

On behalf of Downham Market Town Council and The Neighbourhood Plan Strategy Group we welcome you to our draft Plan. We hope that once the Plan is accepted it will have a positive impact on the future of our Town, and will ensure that your voice is heard when planning applications are being considered.

Neighbourhood Plans arise from the Government's Localism Agenda which is intended to ensure that local communities are closely involved in some of the decisions that affect them. The aspirations and needs of the local community of Downham were gathered during an earlier public consultation process. These have been used in preparing this draft which we are now presenting to you for your comments. After this consultation period the final draft will be scrutinised by the Borough Council and an Examiner. It will then be the subject of a local referendum in which you will be able to vote.

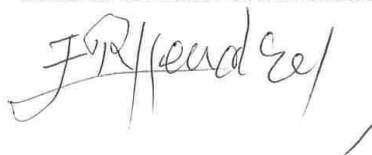
The town needs to be able to support socially and economically a diverse community with excellent services. As it grows, it will need to decide where it spends its resources based on needs. The overall population can be expected to become older as people live longer and healthier lives, so provision should be made to support and develop facilities that keep the majority of these residents at home. This can result in different generations of residents mixing together thus providing a healthy social fabric for the community.

The economy of the town must provide a setting that fosters sustainable and rewarding jobs. Therefore, future employers will need to work alongside education and skills providers, to ensure that residents have the right knowledge to garner any local employment opportunities. It is also important to safeguard our existing local agricultural work force, as food production will become vitally important in the future.

The Neighbourhood Plan has been developed over the course of several years and drafted by the Strategy Group that includes Town Councillors and local residents. Kings Lynn and West Norfolk Borough Council and consultants from ABZAG Ltd have provided the necessary support. We thank all those who have participated in this process.

The six-week consultation on the Pre-Submission Version of the Neighbourhood Plan has commenced, closing on Friday 12th November 2021. It is important, and we encourage, all residents and stakeholders to respond.

On behalf of the Town Council and residents of Downham Market we would like to thank all those who have worked so hard in the production of the Neighbourhood Plan and the wider community for their engagement and input that has shaped and determined the objectives and needs for the future of Downham Market.



Elizabeth Hendry
Chairman, Neighbourhood Plan Strategy Group



Jenny Groom
Mayor, Downham Market

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Executive Summary

Downham Market has a strong community – residents who are passionate about their town, surrounding area and want to positively preserve its character. The Downham Market Neighbourhood Plan (DMNP) has been written to enable the local community to have a positive effect on planning in the parish, for the benefit of both existing and future residents.

The importance of the DMNP will become apparent over the coming years as it provides our community with a voice in the complex planning process and a means of shaping future development. In this way, local voices will be heard when decisions are taken about housing, traffic, pavements, cycle routes and other things that affect daily lives.

There are fifteen policies within the DMNP, grouped into three key themes, created to support the Vision, Aims and Objectives for Downham Market (see Section 3, pages 14 and 15). Each policy has emerged from consulting with the local community and further developed by the Neighbourhood Plan Strategy Group to preserve our town or to enhance any proposed developments.

As a brief overview to the focus of each policy:-

- **Policy 1** will see good design principles used to improve the quality of future development.
- **Policy 2** will support Downham Market remaining a distinct settlement.
- **Policy 3** seeks to improve the setting and visual impact of development while preserving trees and hedgerows.
- **Policy 4** focuses on preventing issues with roads and car parking while trying to stop mistakes of the past being repeated.
- **Policy 5** identifies several elements to facilitate the building of better homes for people to live in.
- **Policy 6** ensures those households with a local connection to Downham Market have first opportunity for any new Affordable Housing.
- **Policy 7** wants to reduce the future impact of light pollution.



- **Policy 8** seeks to recognise the issues with traffic and deliver mitigation measures.
- **Policy 9** requires sustainable transport modes to be considered.
- **Policy 10** looks to reduce flood risk and ensures new development does not cause flooding issues.
- **Policy 11** seeks better access to the countryside, biodiversity gain, inclusion of elements to enhance wildlife habitats and retention of trees and hedgerows.
- **Policy 12** is looking to address the issue of funding for the ongoing management and maintenance of open space.
- **Policy 13** supports the local economy through new employment opportunities.
- **Policy 14** seeking to retain business premises.
- **Policy 15** focuses on development associated with tourism.

The DMNP has been written to enable the local community to have a positive influence on planning in the parish for the benefit of its residents, both current and new. The importance of the Downham Market Neighbourhood Plan will grow over the coming years as it is used to influence and shape future development through the stronger community voice it creates.

A six-week consultation (Regulation 14) on the Pre-Submission Version of the DMNP will close on Friday 12th November 2021, this creates the opportunity for local residents and stakeholders to express their views and help to inform the Neighbourhood Plan.

To aid understanding, a glossary of the planning terms can be found in Appendix 1 and the various reference documents referred to in the DMNP are listed in Appendix 2.



Section 1: Background & Legal Requirement

Localism Act 2011 & Neighbourhood Planning Act 2017

- 1.1. The **Localism Act 2011** amended the Town and Country Planning Act 1990 introducing new rights and powers to allow local communities to shape new development in their community by preparing a Neighbourhood Development Plan, which can establish general planning policies for the development and use of land in the neighbourhood. This document is a Neighbourhood Development Plan, as defined in the Act, for the town of Downham Market.
- 1.2. **Neighbourhood planning** provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people.
- 1.3. The **Neighbourhood Planning Act 2017** is intended to strengthen neighbourhood planning by ensuring that planning decision makers take account of well advanced neighbourhood development plans and by giving these plans full legal effect at an earlier stage.
- 1.4. **Neighbourhood planning** gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They can choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.

Submitting Body

- 1.5. This document, entitled the Downham Market Neighbourhood Plan (DMNP), is submitted by Downham Market Town Council, which is recognised as the Qualifying Body for Downham Market as defined by the Localism Act 2011.

Neighbourhood Area

- 1.6. The DMNP applies to the entire town of Downham Market in the Borough Council of King's Lynn & West Norfolk. In accordance with Regulation 6 of the Town and Country Planning, Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.7. Borough Council of King's Lynn & West Norfolk, the local planning authority, approved the Neighbourhood Area application from Downham Market Town Council in 27 January 2016 and the entire town of Downham Market is designated as the Neighbourhood Area, as shown on Map 1.

Map 1: Downham Market Neighbourhood Area



- 1.8.** Downham Market Town Council confirms that the DMNP:
- (i) relates only to the parish of Downham Market and to no other Neighbourhood Areas;
 - (ii) is the only Neighbourhood Development Plan in the designated area. No other Neighbourhood Development Plan exists nor is in development for part or all of the designated area; and
 - (iii) does not deal with excluded development.

The Context

- 1.9.** The DMNP must comply with the following neighbourhood planning basic conditions:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - b) the making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - c) the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). The local strategic context is, therefore, set by the Borough of King's Lynn & West Norfolk Council's Core Strategy;
 - d) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations; and
 - e) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

Plan Period

- 1.10.** The DMNP has a plan period of twenty years, from 2022 to 2042. It is, however, a response to the needs and aspirations of the local community as understood today and recognises that current challenges and concerns are likely to change over the plan period.

Key Stages in Developing the Neighbourhood Plan

- 1.11.** The production of the DMNP has been led by Downham Market Town Council, although the hard work and effort in guiding it through process has been undertaken by a Strategic Group, established from members of the local community and stakeholders, with support from the Town Clerks and consultants from ABZAG Ltd.

Consultation & Submission

- 1.12.** This document, entitled the draft Downham Market Neighbourhood Plan (DMNP) is submitted by Downham Market Town Council, which is recognised as the qualifying body as defined by the Localism Act 2011.

- 1.13.** The pre-submission consultation on the DMNP Plan will start Friday 1st October 2021 and closed 5pm Friday 12th November 2021. The DMNP will be informed and updated to incorporate comments received from local residents and stakeholders. A copy of the proforma Response Form is at Appendix 4.
- 1.14.** The DMNP and supporting documents will be submitted to the Borough Council of King's Lynn & West Norfolk before undergoing an independent examination.

Examination

- 1.15.** The role of the independent examiner will be to consider whether the draft DMNP has followed the plan making process and meets the 'basic conditions' (see paragraph 1.9) as set out by the Neighbourhood Planning Regulations.
- 1.16.** The examiner will make a recommendation as to whether the DMNP should proceed to a referendum, with or without modifications, and whether the geographic area for the referendum should extend beyond the Neighbourhood Plan Area.

Referendum & Adoption

- 1.17.** Subject to a successful examination outcome, the DMNP will proceed to a local referendum where the residents of Downham Market, who are registered voters, will be asked whether they want the Borough Council of King's Lynn & West Norfolk to use the DMNP when it determines planning applications in the town of Downham Market (the Neighbourhood Plan Area).
- 1.18.** Provided a favourable response is received, the DMNP will become part of the statutory 'development plan' for the area which is the starting point for determining planning applications in Downham Market.

Monitoring and Review

- 1.19.** Downham Market Town Council, as the Qualifying Body, will be responsible for maintaining and periodically revisiting the DMNP to ensure relevance and to monitor delivery.



Section 2: About Downham Market

- 2.1.** Downham Market, sometimes simply referred to as Downham, is a market town and civil parish in Norfolk England. It is located on the edge of the Fens, on the river Great Ouse, approximately 11 miles south of Kings Lynn, 40 miles west of Norwich and 30 miles north of Cambridge. In 2019, a local census put the population of Downham Market at 11,022. with over 5000 households, in an area of 520 hectares.
- 2.2.** For local government purposes, the parish falls within the district of Kings Lynn and West Norfolk Borough Council and Norfolk County Council, while the current MP is Elizabeth Truss.
- 2.3.** The town sign depicts the crown and arrows of Saint Edmund with horses to show the importance of horse fairs in the town's history. On a wider historical note, the town is known as the place where Charles the first stayed, after the battle of Naseby. Rumours persist that it was the place Nelson received his early education.
- 2.4.** Downham Market largely grew up as an agricultural centre, whilst simultaneously developing as a market, from which the produce of the Fens could be sold and transported by river. During the Middle Ages, Downham was famed for its butter market and later, from the early 19th to the early 20th century, it hosted the St Winolds horse fair. It currently has a general market held on Fridays and Saturdays; one of the longest running markets in Norfolk.
- 2.5.** Notable buildings in the town include the mediaeval parish church which is dedicated to Saint Edmund and the Victorian clock tower constructed in 1878 alongside it is the Town Hall. Downham has an extensive conservation area in which 172 graded and listed buildings may be found.



2.6. Before the arrival of the railway in 1846, the riverside area was essentially Downham Market. It was largely made up of agricultural and warehousing facilities and businesses that used the Great Ouse River to transport goods. With the coming of the railway there was a rapid industrial, commercial, and residential development up Bridge Street, with movement of the market, and horse fair up into the town, which can be seen in the town's architecture, which, from the Railway Station to the town centre, is predominately Victorian and Edwardian. The contour of the road reflects the rising ground from the river to one of the highest points in the town, St Edmunds Church.

2.7. During the late 1950s it became increasingly apparent that the increase in population and the subsequent use of motor vehicles made the configuration of the town, as it was then, difficult to navigate. To ease the traffic flow, new roads were built and some were widened but in the process, some notable buildings were destroyed.

2.8. Further regeneration project in the early part of the 21st century saw the town square and immediate surrounding area remodeled. In 2004 the town completed a regeneration project on the marketplace moving the general market to the town hall car park

2.9. Downham, like many towns, has seen massive changes in its retail offering, but still features a mix of independent and national stores. Interestingly, REEDS department store is often referred to as the Harrods of the Fens. Queen Mary, the Queen's grandmother, was a regular customer, during her visits to the Sandringham Estate.

2.10. Today Downham Market has seen rapid residential development and has become a popular commuter town for Cambridge. It has lost significant amounts of open space to large scale, uniform residential development. This has resulted in environmental concerns, such as more frequent flooding, particularly in areas not otherwise prone to this.

2.11. Going into the future the Town Council has established a town partnership which it believes will be able to revitalise and reverse the steady decline of the town centre and High Street. This work is, in part, reflected in the neighbourhood plan which has as an aspiration of greater economic development as one of its policy objectives.

2.12. Thank you to the work of Downham Market and District Heritage Society (Discover Downham). See Appendix 3 for a brief history of Downham Market.



Section 3: Vision, Aims & Objectives

- 3.1. The community of Downham Market has been heavily involved in shaping the DMNP, a summary of the process and key steps are set out in Section 1.
- 3.2. Downham Market has a strong history and its residents are proud of its appearance, sense of community and amenities.
- 3.3. It is important for Downham Market to continue to be a popular, attractive and safe place to live and work – this underpins Our Vision - for It to remain distinct from the surrounding villages with a core semi-urban area and a rural boundary. The town will have a range of excellent facilities allowing residents of all ages to live, work, play and contribute fully to the ongoing sustainability of the town.

3.4. Our Vision for Downham Market

Downham Market is a town renowned for its individuality and historical importance.

The residents and businesses wish to see a vibrant, caring and safe community in which all feel comfortable, at home and valued.

3.5. Aims and Objectives

Aims	Objectives
a) Aim to create opportunities for existing and future residents to live in affordable, decent and sustainable homes.	To <ol style="list-style-type: none"> 1. preserve and enhance the natural and built historic environments, ensuring that future development is of high-quality and promotes health and wellbeing. 2. promote new housing encompassing high quality design that meets local needs and enables residents to access affordable homes with a mix of accommodation suitable for all generations.

Aims	Objectives
<p>b)</p> <p>Aim to preserve the environment and take steps to reduce the impact of climate change.</p>	<p>To</p> <ol style="list-style-type: none"> 3. minimise the impact of new development on the surrounding countryside, landscape, and ecosystems. 4. promote the use of more sustainable modes of transport and reduce pollution and traffic congestion. 5. preserve and enhance open spaces, especially waterside access and a high-quality riverside environment.

Aims	Objectives
<p>c)</p> <p>Aim to promote a positive quality of life to sustain the vitality, health and safety of a community that is inclusive to all.</p>	<p>To</p> <ol style="list-style-type: none"> 6. enhance the character and vitality of the Town and seek to integrate any new housing into the existing built environment. 7. promote multi-functional recreational space to support new and existing activities, providing access for all and encouraging social interaction for residents of all ages. 8. conserve open spaces, green corridors and encourage tree planting schemes. 9. enhance the road network to improve traffic management and road safety with priority given to the provision of pedestrian walkways, and cycle routes.

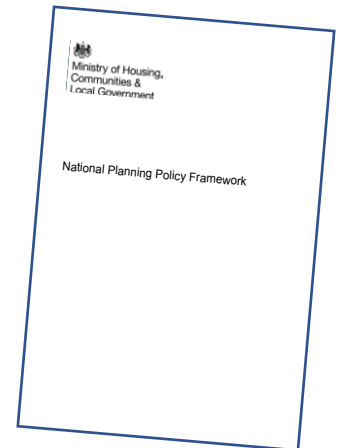
Aims	Objectives
<p>d)</p> <p>Aim to promote the local economy and employment.</p>	<p>To....</p> <ol style="list-style-type: none"> 10. support the development of a broad range of healthcare, educational and training facilities. 11. support the growth of economic activity serving the needs of local people through employment opportunities, including active development of the Town's market. 12. improve provision of communication connectivity (mobile signal strength and broadband speeds).

Section 4: Sustainable Growth and Spatial Context

Sustainable Growth

4.1. The National Planning Policy Framework is about positive growth and development that is sustainable. This is measured and tested by three dimensions that define 'sustainable' in planning terms.

- **Economic** – contribute to building a strong, responsive and competitive economy.
- **Environmental** – contribute to protecting and enhancing our natural, built and historic environment.
- **Social** – supporting strong, vibrant and healthy communities.



4.2. The DMNP is positive towards development and the community understands the need to accommodate housing growth, new people and businesses. To achieve this Downham Market Town Council will work positively with the Borough Council of King's Lynn & West Norfolk Planning Officers, landowners and developers to plan how Downham Market will change to the benefit of the whole community.

4.3. The DMNP outlines the approach and on this basis, the local community will look to positively engage with the statutory planning process to guide future development. As growth comes it must create developments of quality that contribute to the character of the town and provide additional local benefits. It must be more than an exercise in meeting housing supply 'numbers' through the addition of characterless estates that destroy the look and feel of Downham Market.

4.4. Housing and other development will be expected to contribute towards improving local services and infrastructure, including contributions towards new infrastructure (such as transport, education, library provision, fire hydrant provision, open space, etc.) through planning obligations and via S106 agreement or S278 agreement or use of planning conditions.

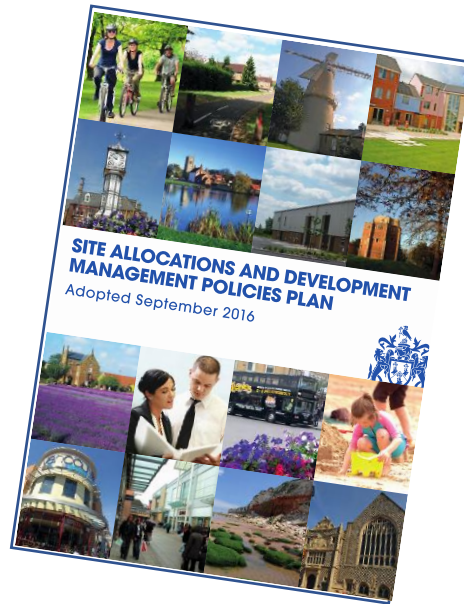
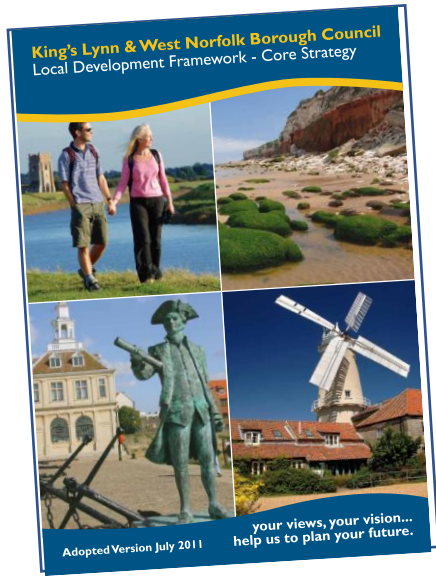
4.5. Residents of Downham Market appreciate the special qualities it has and want to protect the town they feel it is a great place to live. Knowing that there are pressures for further growth and that it is likely to come, there is great concern that new development could erode the very qualities that make Downham Market special. It is imperative that development is carefully managed in terms of its location, scale, design and integration.

4.6. Therefore, as defined in Aim (a) is to create opportunities for existing and future residents to live in affordable, decent and sustainable homes.

Strategic Context

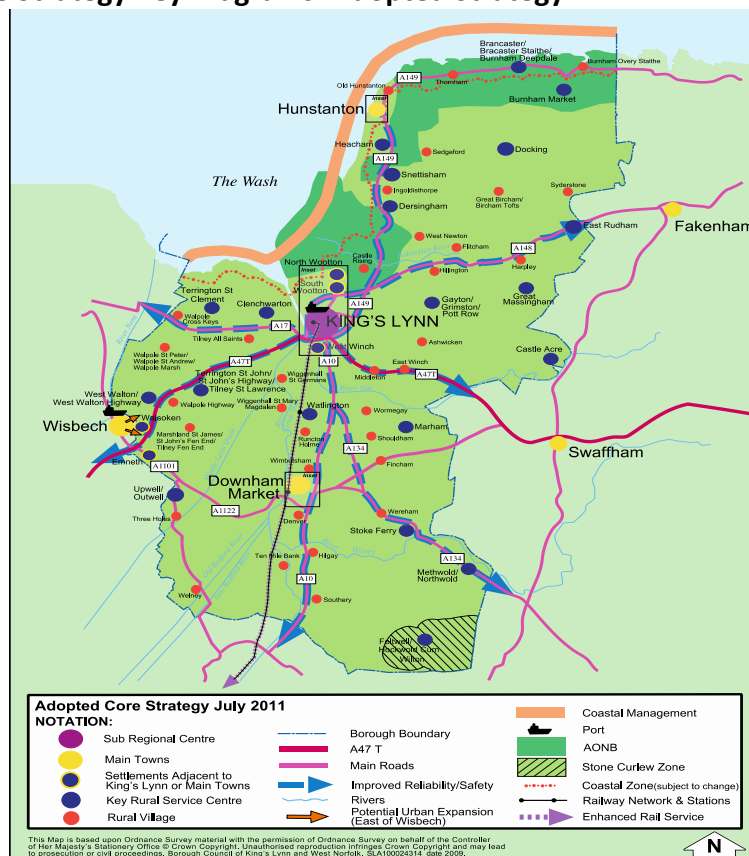
4.7. The Local Plan covering the Downham Market Neighbourhood Area comprises of:-

- Core Strategy (July 2011)
- Site Allocations and Development Plan Document (September 2016)



4.8. Downham Market is designated a 'Main Town' in the Core Strategy. Although the general strategy is to locate the bulk of new development and growth in the Borough's towns over the plan period to 2026, recognition has been given to the large scale housing growth Downham Market has accommodated in recent years.

4.9. Map 2: Core Strategy Key Diagrams: Adopted Strategy.



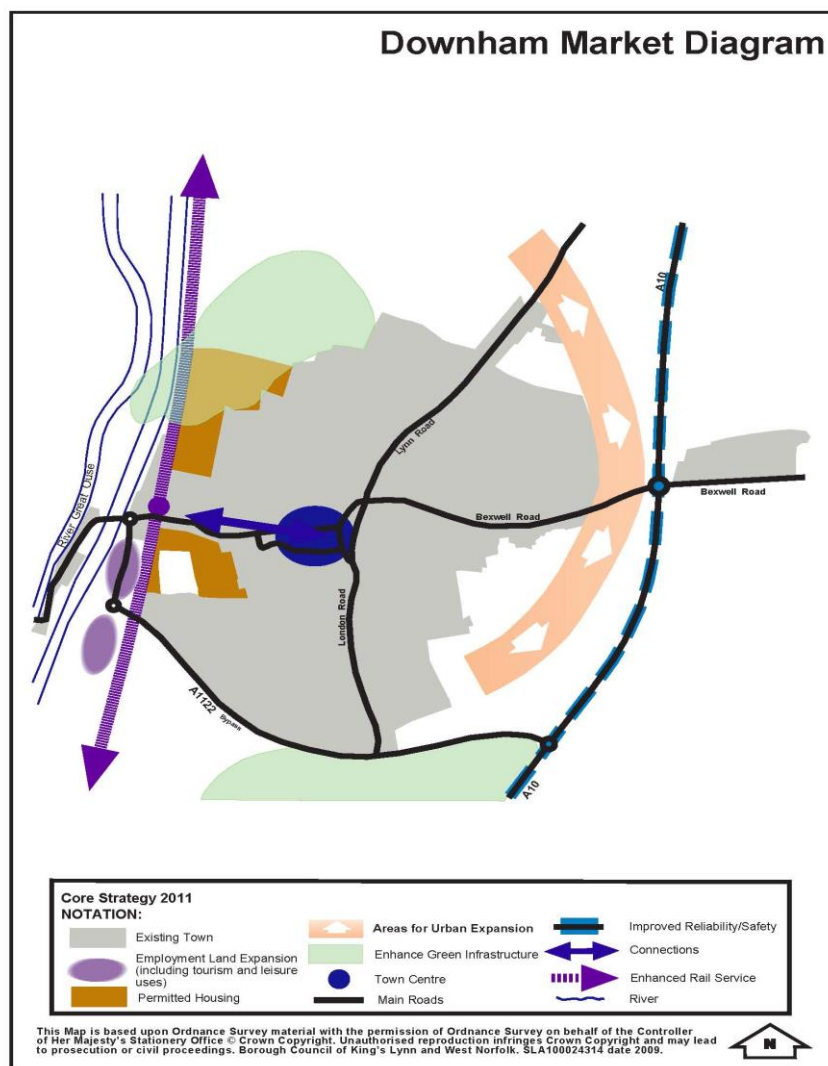
4.10. A lower proportion of the Borough’s new growth over the next decade or so has therefore been allocated to Downham Market, compared to others, in order to provide a slower pace of growth allowing the town to settle and for services and facilities to adjust to the increased population.

4.11. It is envisaged that growth will still continue, but at a slower pace than in recent times. The Core Strategy planned that the town would receive allocations for at least an additional 390 homes, and 15 hectares of employment land.

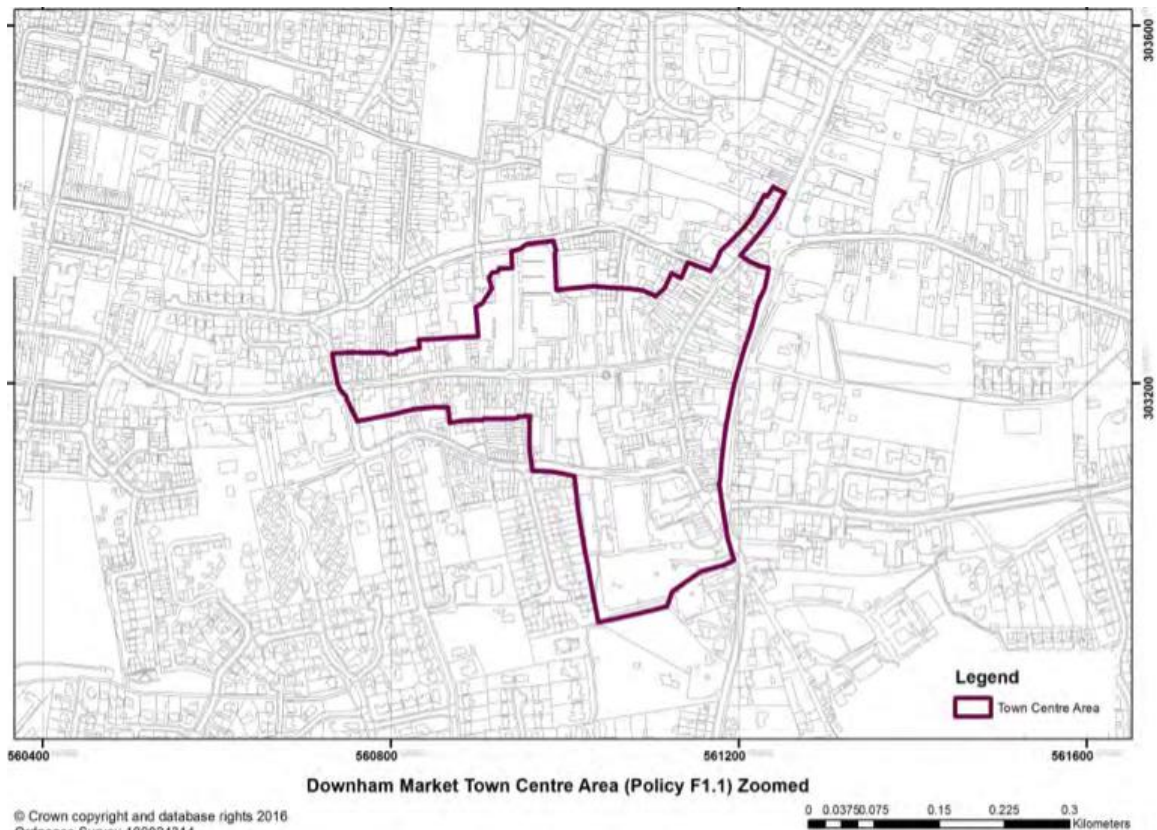
4.12. The western side of the town, around the River Great Ouse and the Relief Channel, are constrained by high degrees of flood risk (identified as Flood Risk Zone 3 and Tidal Defence Breach Hazard Zone by the Borough’s Strategic Flood Risk Assessment).

4.13. The flood risk to the west, and the A1122 by-pass road to the south, form clear geographical and physical constraints to growth of the town in these directions. The Key Diagram in the Core Strategy indicates broad “areas for urban expansion” around the eastern side of Downham Market.

4.14. Map 3: Core Strategy Key Diagram: Downham Market Diagram - Figure 9



- 4.15.** The Core Strategy proposes a housing distribution of :-
- 73% of new development in the Borough will be concentrated in the Main Towns - King's Lynn / **Downham Market** / Hunstanton including Wisbech Fringe
 - 17% in the 24 Key Rural Centres
 - 8% in the 39 Rural Villages
 - And the remaining 2% in other.
- 4.16.** Policy CS04: The role for Downham Market will continue as a main town providing and supporting employment and essential services for the southern part of the borough. In supporting the function of the town, provision will be made for:
- At least 15 ha in existing employment areas; combined support for an employment area alongside the east bank of the Relief Channel south of Hythe Bridge and; as part of a balanced mix of uses within areas of renewal and replacement;
 - At least 2,710 new homes including at least 390 new houses on greenfield site(s) adjoining the eastern half of the town.
- 4.17.** Policy CS09 Housing Distribution identifies for **Downham Market**: Provision will be made for at least 2,710 dwellings in total (with allocations for at least 390 new homes) in Downham Market over the plan period, which will require new allocations in the town and will be identified through the Site Allocations DPD.
- 4.18.** The Site Allocations and Development Management Policies Plan (SADMP) identifies allocations for Downham Market in the following policies.



4.19. Map 4: Downham Market Town Centre Area

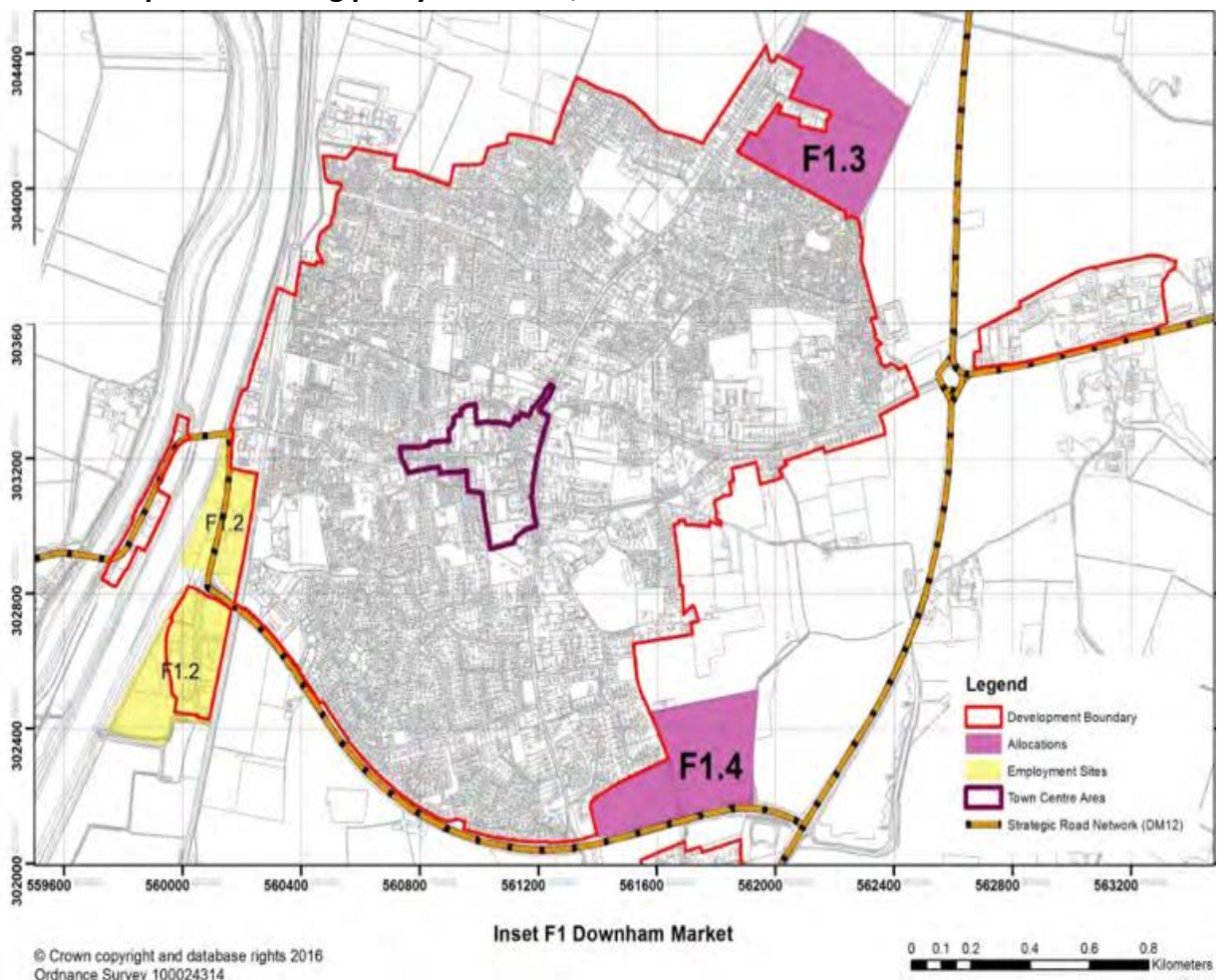
4.20. Policy F1.1 – Downham Market Town Centre Area and Retailing. The policy is intended to support this mix of uses, and the physical and heritage assets of the town, while retaining the town centre as the primary focus for retailing in the town. The latter is in accordance with, and forms the reference area for, the town centre retail policies of the National Planning Policy Framework. See Policy Map

4.21. Policy F1.2 – Land off St. John’s Way, Downham Market: Land in the vicinity of St. John’s Way, as shown on the Policies Map, is allocated for employment uses (classes B1, B2 and B8). See Policy Map 5.

4.22. The Core Strategy aims to provide a sufficient and flexible supply of employment land during the plan period (Policy CS10 Economy). This is to include a 16.5ha site allocation in Downham Market.

4.23. Policy F1.3 – Downham Market North-East: Land east of Lynn Road in vicinity of Bridle Lane. Land north-east of Downham Market of around 16.2 ha, as shown on the Policies Map, is allocated for a high quality, well landscaped development at least 250 dwellings and associated facilities. See Policy Map 5.

4.24. Map 5: Illustrating policy areas F1.2, F1.3 and F1.4



- 4.25.** Policy F1.4 - **Downham Market South-East: Land north of southern bypass in vicinity of Nightingale Lane.** Land to the south east of Downham Market of around 13.9ha, as shown on the Policies Map, is allocated for a high quality, well designed development at least 140 dwellings and associated facilities. See Policy Map 5.

Spatial Vision

- 4.26.** **Core Strategy Vision: People want to be part of the success story that is West Norfolk, drawn here to live, work, invest and visit.**
- 4.27.** West Norfolk enjoys an unparalleled balance between quality of life and quality of opportunity with people drawn to the area to take advantage of this. Specifically - **Downham Market** remains a key local centre serving the Fens and the southern part of the Borough with the services necessary to meet the demands of a growing population.

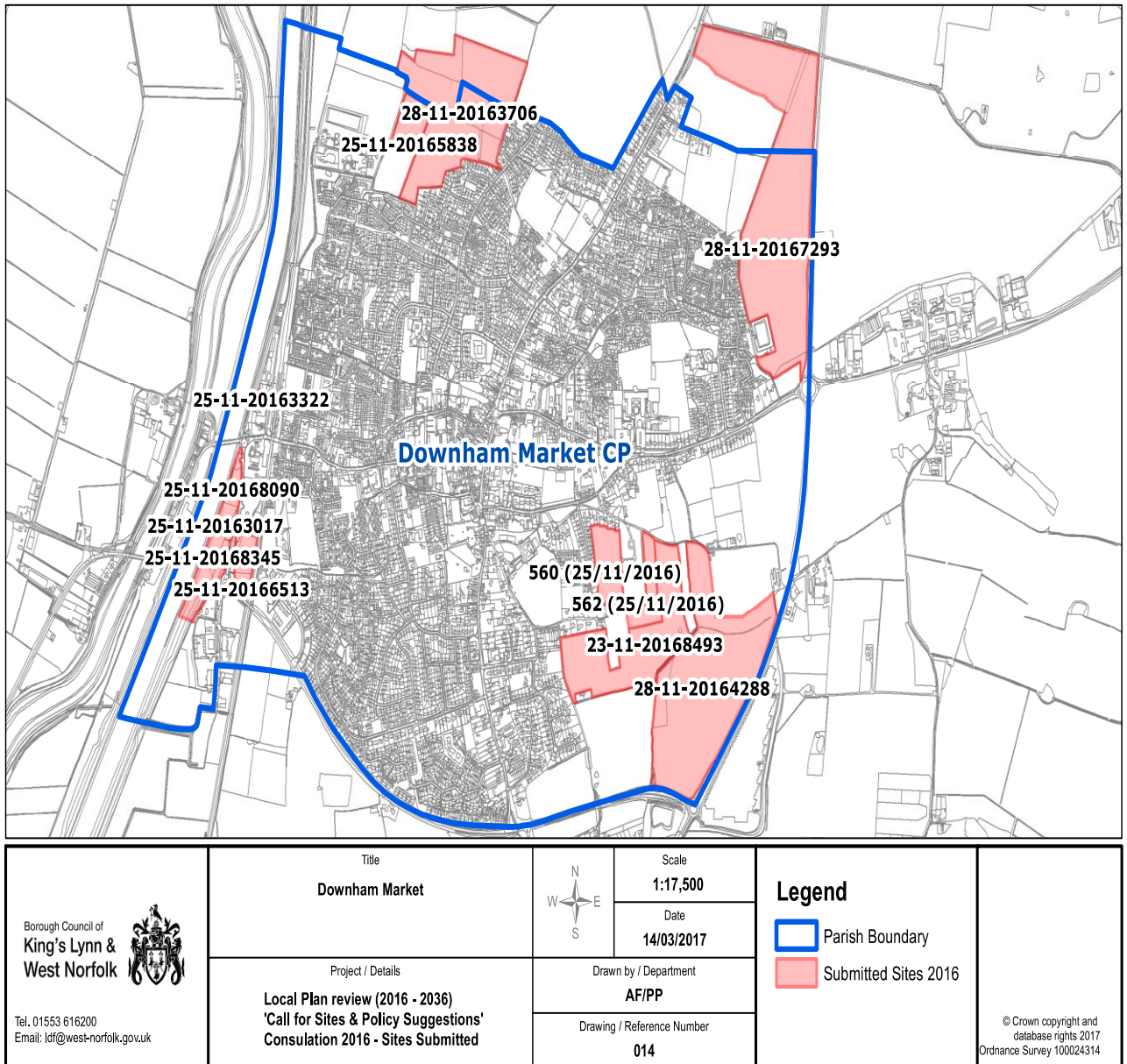
Review of Local Plan

- 4.28.** The Borough Council's Local Plan currently consists of the two documents; the Core Strategy (CS) adopted in July 2011 and the Site Allocations and Development Management Policies Plan (SADMP) adopted in September 2016. As part of the adoption of the SADMP the Borough Council agreed to review both documents to create one single plan document that would look over the longer term to 2036. The Government have since also introduced the legal requirement to review a Local Plan every five years.
- 4.29.** The review began towards the end of 2016 when a consultation was held asking for people to submit sites for the Borough Council to consider for development for a variety of uses including housing and employment. This was also an opportunity to make any policy suggestions.
- 4.30.** The Local Plan review is exactly that, it is a review, so does not start from scratch. Many of the existing policies are proposed to be carried forward, albeit updated where appropriate. This includes most of the housing allocations made in the 2016 Plan.
- 4.31.** The housing need was in the region of 700 new homes being needed each year in the Borough in 2016. The 2016 Plan supported this. Today the housing need has reduced to 539 new homes per year, 10,780 new homes over the period of 2016-2036.
- 4.32.** This is a significant reduction, especially over a 20-year plan period. The need was higher at the point when the draft version of the Local Plan review was consulted upon in 2019, this meant several new draft allocations were proposed. The housing need has dropped, and these are no longer needed. This is not surprising as the need has fallen, and the 2016 Plan adopted four years ago catered for a much higher need. This has resulted in

an unusual situation with no absolute requirement to make any further housing allocations to meet the Local Housing Need.

4.33. The Review document builds on policies in the Core Strategy and SADMP and there are no significant changes specifically effecting the policies or allocations for Downham Market, see Map 6 for the submitted sites.

4.34. Map 6: Downham Market Submitted Sites



Section 5: Neighbourhood Plan Policies

- 5.1.** All developers and promoters of development (housing or otherwise) in the designated Neighbourhood Area of Downham Market will be required to conform to the policies described in the National Planning Policy Framework (NPPF) and the KLWN Local Development Framework - Core Strategy (CS). In addition, all development will be required to meet the policy requirements of the Downham Market Neighbourhood Plan (DMNP) document as set out and described in this section.
- 5.2.** Over the past decade the town housing has grown to a point where it is now almost twice the size but in the meantime the facilities within the town have not seen much improvement. This has led an underinvestment in infrastructure, amenities and the economy that will need to be addressed in the future.
- 5.3.** To achieve the Vision, Aims and Objectives of the Downham Market Neighbourhood Plan the following suite of planning policies have been drafted.
- 5.4.** The policies have been designed to ensure that new development enhances the setting and character of Downham Market to promote a sense of community, and to provide for the social and economic needs of the residents.
- 5.5.** The policies have been developed during the preparation of the Downham Market Neighbourhood Plan from the consultation feedback and using evidence of local issues and characteristics.
- 5.6.** To aid interpretation, each policy is preceded with its own ‘ambition statement’ to outline the intent of each policy, which is also supported by contextual narrative, the views expressed by the local community, evidence and justification. Details are given of the plans and strategies that support the policy approach and how each policy is linked to the Neighbourhood Plan Objectives and KLWN Core Strategy Aims.
- 5.7.** The Neighbourhood Plan policies are grouped by three themes:

➤ **Build Environment**

➤ **Natural Environment**

➤ **Business & Tourism**

- 5.8.** All policies have been framed in the context of the National Planning Policy Framework and the Core Strategy. Decision-makers and applicants must read the policies as a **whole** when judging if any development proposal would be acceptable.

Built Environment

5.9. Residents of Downham Market expect all development proposals to create layouts designed to the highest possible standard, taking account of the character of the town, the environment in which the development is set, and the needs of the community.

5.10. The long-standing, fundamental principles for good design are that it is:

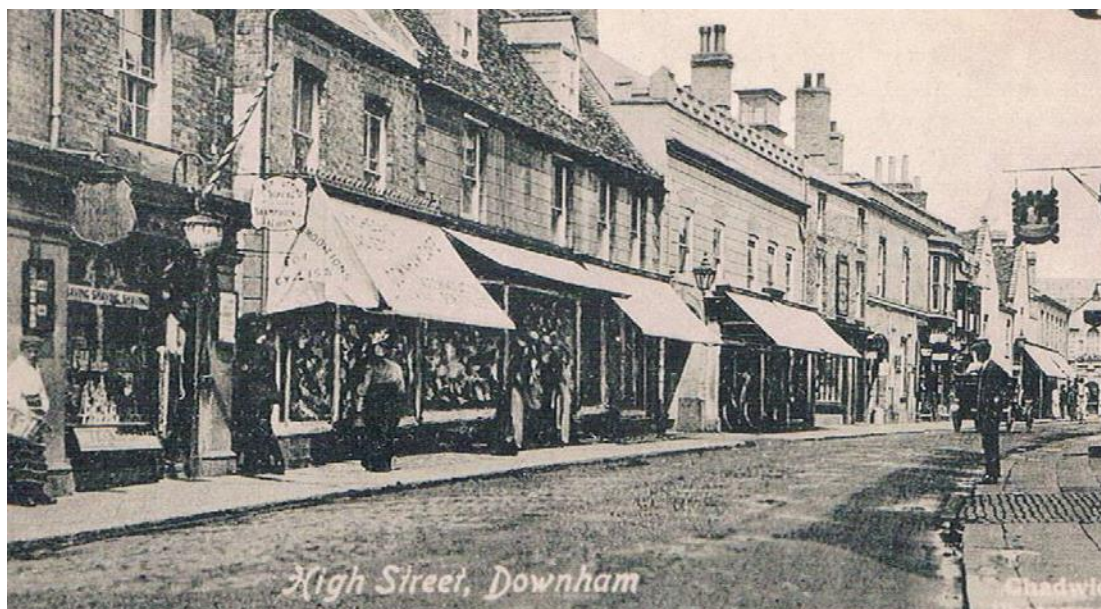
- fit for purpose;
- durable; and
- brings delight.

5.11. Government guidance¹ sets out how good design can achieve well designed places which people will want to live in and promote well-being. The 10 characteristics of well designed places are outlined below: -



¹ National Design Guide 2021

- 5.12.** It is expected that new homes should be designed to a high quality, with a mix in different sizes and materials, and adapted to the expected shift in climate change. It will be necessary to safeguard the unique and distinctive physical and cultural assets – both designated and undesignated - of the town, with the central conservation area and use of the distinctive carrstone, that gives the town its nickname of the “Gingerbread” town.



- 5.13.** Heritage assets within the town, especially the listed buildings in the Conservation Area, and their settings must be protected, conserved and enhanced when development proposals are brought forward.

5.14. Conservation Area

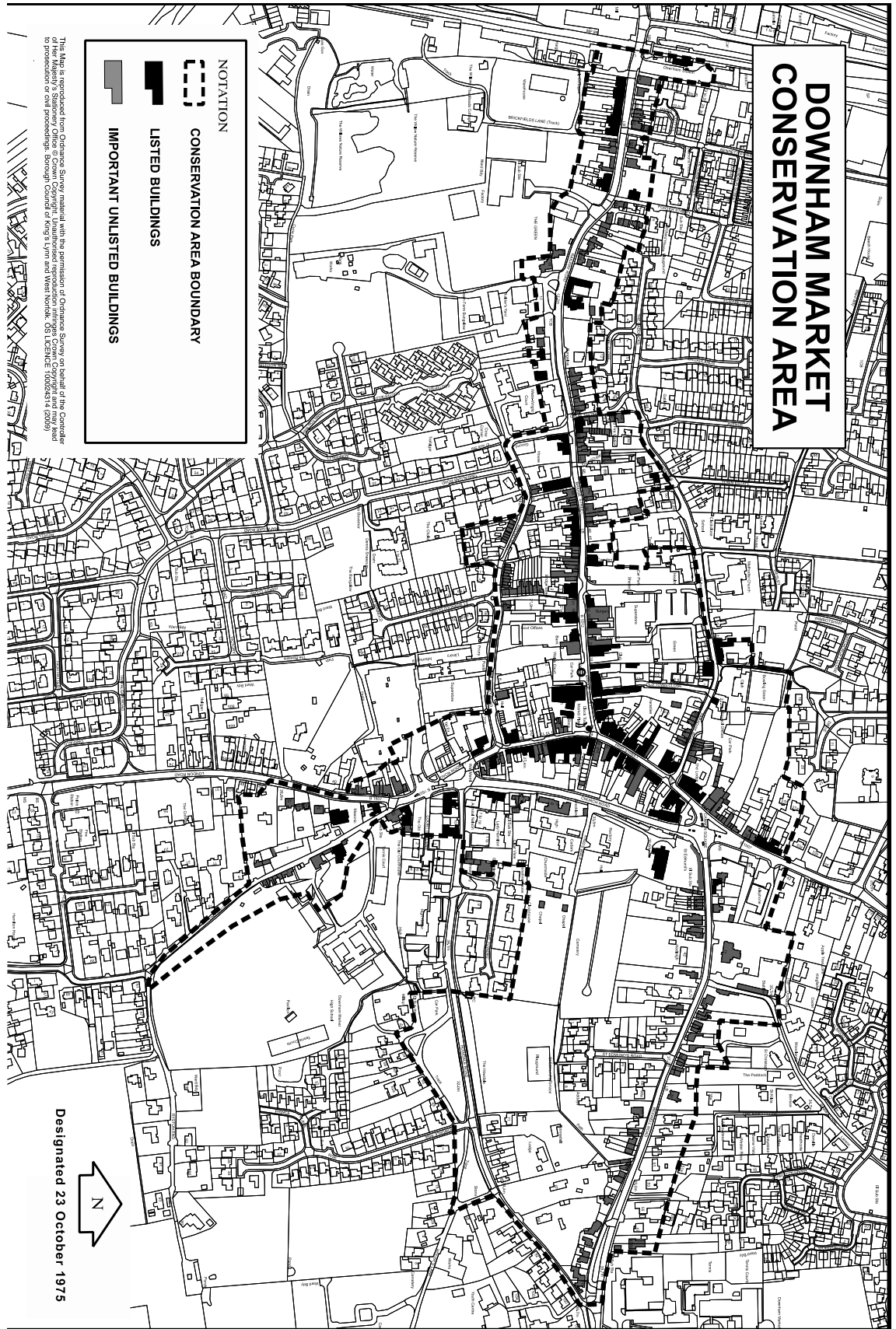
- 5.15.** The Downham Market Conservation Area Character Statement was completed and adopted in 1975 and still holds true to today. In discussions with the Borough Council there is felt no need to update the document.

- 5.16.** The Statement identifies the important features of the Town. Its history, settling including the 172 listed buildings. One grade I – St Edmund’s Church dating back to the 13th century – and the remaining building all grade II (there are no grade II*).



- 5.17.** Whilst there are no Scheduled Ancient Monuments there are 19 sites where archaeological finds have been recorded as part of the Norfolk Records. There are 332 identified buildings that make a particularly positive contribution towards the character of the conservation area – representing c67 percent of the building within the conservation area.

5.18. Map7: Downham Market Conservation Area



5.19. The following plans, documents and strategies support Policies 1 to 9:

- Building for a Healthy Life: (2020)
- Dementia-friendly housing guide (2020)
- Conservation Area Character Assessment (1975)
- DMNP Emerging Policy Statement Discussion Document (January 2021)
- Downham Market Network Improvement Strategy NCC (April 2020)
- Historic England - Streets for All (March 2018)
- Housing Needs Assessment, HNA (2019)
- KLWN Emerging Local Plan Review 2016 – 2036 (2021)
- KLWN Local Development Framework – Core Strategy (July 2011)
- KLWN Self-Build & Custom House Building Action Plan (2018)
- KLWN Site Allocations and Development Management Policies (September 2016)
- Landscape Character Assessment SPD (2007)
- National Design Guide (2019)
- National Planning Policy Framework, NPPF (2021)

5.20. Policy 1: Development – great places to live

5.21. To drive good design, developers will be encouraged to follow the principles of ‘**Building for a Healthy Life**’. This is an industry standard quality assessment for well-designed homes and neighbourhoods endorsed by Government.

5.22. **Building for a Healthy Life (BHL)** is the latest edition of - and new name for - **Building for Life 12** and is about guiding better planning of new development through urban design that is safe and provides everything that should be expected for a new community.



5.23. BHL updates England’s most widely known and most widely used design tool for creating places that are better for people and nature. The original 12-point structure and underlying principles within Building for Life 12 are at the heart of BHL. The new name reflects changes in legislation as well as refinements which made to the 12 considerations in response to good practice and user feedback.

5.24. Using a simple ‘traffic light’ system to assess the quality of any new development.




 **red = stop & rethink**



 **amber = try & turn to green**



 **green = go ahead**

5.25. As a framework, BHL, lists and illustrates examples of good practice highlighted by a green light. Poor practice is highlighted with a red light.

5.26. Where an element of design is considered to fall between a green and a red traffic light, an amber light can be assigned to a particular consideration - it cautions that an aspect of a scheme is not fully resolved. In many cases it is possible to rethink and redesign an aspect of a scheme to achieve a better outcome.

5.27. Using BHL principles, developers should be able to demonstrate how, through good design, any proposed development will follow key design principles to respect scale, form, material finishes and the vernacular character of existing buildings, recognising the historic importance and individuality of Downham Market.

5.28. Historic England's guide – Streets for All – has practical design principles and advice that should, where possible, be applied to the public realm works in sensitive historic locations. There are many examples of good practice in such areas as highways, footpaths, street furniture, parking, traffic calming and environmental improvements.

5.29. The Downham Market Neighbourhood Plan seeks to ensure that local vernacular and design are at the heart of new development proposals.

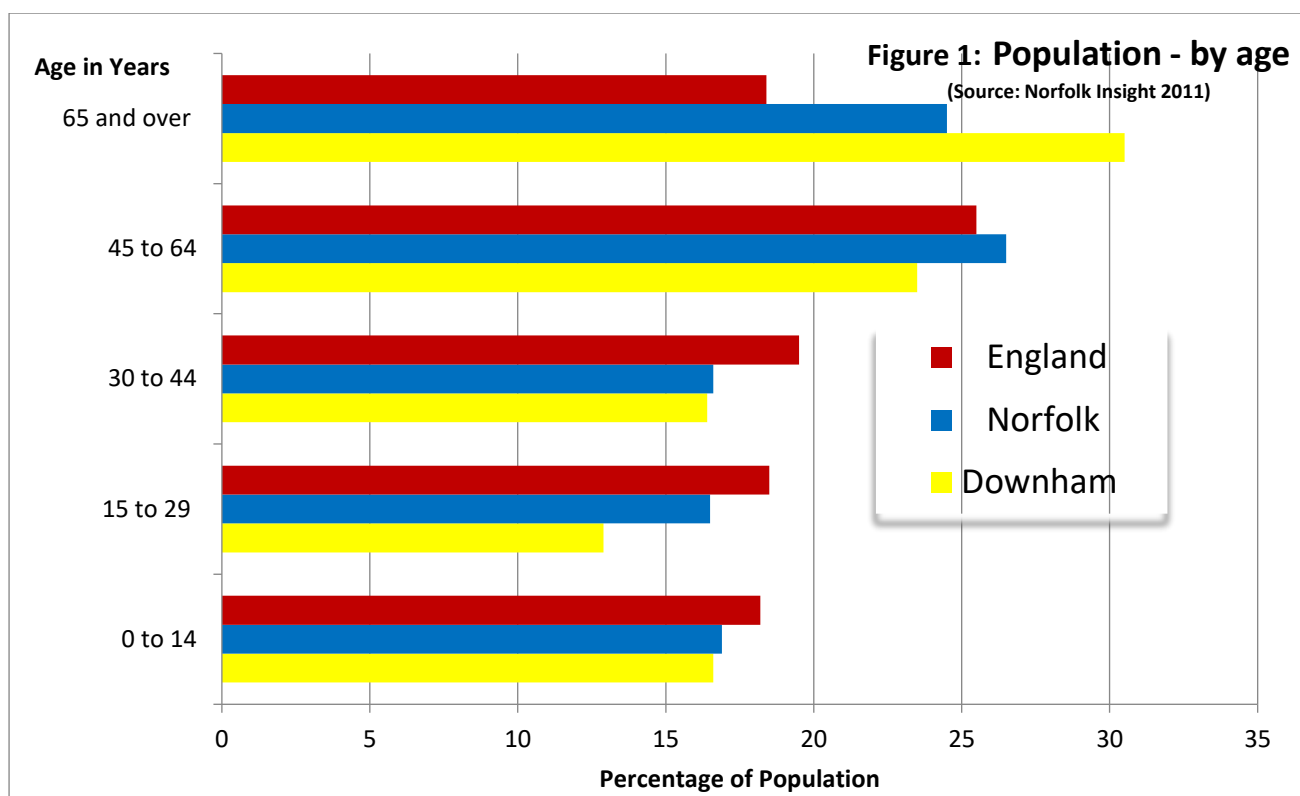
5.30. A number of infrastructure issues have been identified in the emerging Local Plan – for Downham Market, these are:

- As a busy tourist destination this does place pressure on the highway network and on parking – causing traffic and parking issues.
- Limited public transport available means visitors arrive by car – caused by a lack of public transport alternative options.

5.31. Through planning obligations and via a S106 agreement or S278 agreement or use of planning conditions development will be expected to contribute towards improving local services and infrastructure, including contributions towards new infrastructure.

5.32. Nationally it is recognised there is a rapidly ageing population. Locally the picture is more dramatic with the age structure of Downham Market population being considerably older – with 30.5% of the population aged 65 years or over when compared with 24.5% in Norfolk and only 18.4% for England. This is illustrated in Figure 1 (Population – By Age) and has significant implications for planning and plan-making.

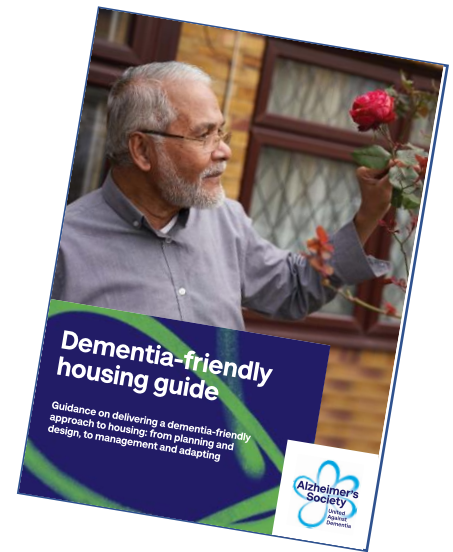




- 5.33.** Local authorities across Norfolk are working hard to try to reduce pressure on social care and hospital budgets through a range of measures, called ‘early help’, and key amongst them is a desire to help keep people at home for as long as possible before moving them into residential care accommodation.
- 5.34.** There is also increasing demand for specialist retirement-type accommodation, sometimes called ‘extra-care’. This accommodation includes an element of care that helps people to ‘down-size’ more easily to more appropriate and desired accommodation. The National Planning Policy Framework make clear that planning for older people’s housing needs is very important.
- 5.35.** With such an ageing population there will be a need for more housing with care or sheltered accommodation to be provided in future, which is normally best placed where it is well related to local services, particularly a doctor’s surgery, shops and public transport to enable staff, residents and visitors to have good access.
- 5.36.** Baseline data collected to inform the Downham Market Neighbourhood Plan identifies that by 2030 there is predicted to be an increase of over 86% - c26,937 people - across Norfolk suffering from dementia².
- 5.37.** For any new development that comes to Downham Market this is an opportunity for those developments to lead the way by incorporating simple but effective principles into their designs to deliver dementia friendly communities.

² Source: NCC Health and Wellbeing Profile July 2012: estimate based on 2011 figures – from POPPI dementia estimates (as at June 2012)

5.38. The ‘Dementia-friendly housing guide’ is a document that offers useful checks and guidance on designing dementia friendly communities and homes. It also states that “Future-proof all housing by building dementia-friendly design into all housing briefs from the very outset. Dementia- friendly design doesn’t have to be costly if it is engaged with at an early enough stage.”



5.39. It is felt that implementing these simple principles could have a significant impact on health and wellbeing of residents. Recognising how people and their lifestyles change over time, including the need for their homes to be adapted to their needs, is important.

5.40. As the building industry better understands how to apply the relatively simple principles identified (a number of which are already elements of ‘Building for a Healthy Life’), the Downham Market Neighbourhood Plan encourages use of these principles within the design of new developments.

5.41. Integration between new and existing communities is important and can be helped through improved connectivity. New development should seek to join up with the existing footpath and cycleway networks to aid the use of sustainable modes of transport to access the town centre and key facilities and services.

5.42. Appropriate boundary treatments can aid a joined-up feeling and significantly improve the street scene.

5.43. The Downham Market Neighbourhood Plan supports the creation of safe environments and as part of high quality design proposals will be expected to follow the principles outlines in the Secure by Design guide.

5.44. Secured by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice given in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments.



5.45. Incorporating these principles early in the design process will, in most cases, eliminate or significantly reduce any additional development cost.

- 5.46.** Anglian Water has a pre-planning service, which includes a capacity check to determine the impact of sewerage from a proposed development. To ensure wastewater is managed appropriately throughout Downham Market it is expected that new homes be connected to the sewerage system prior to being occupied.
- 5.47.** Household projections³ indicate that older households will increase most at the Borough level, which could have implications for the need for specialist housing for the elderly. However, older people are also more likely to have settled accommodation, whether owned or rented, and therefore these changes do not necessarily translate directly into the need for different sizes of homes.
- 5.48.** The Housing Needs Assessment identifies there are significantly more one person households in Downham Market than in KLWN, and this applies to households of all ages, though mainly to those aged 65 and over. Conversely, there are fewer family households in Downham Market than across the Borough, in particular those with children.
- 5.49.** To encourage the social mixing implied by the concept of “balanced communities”, affordable housing should be dispersed in small groups throughout the development area.
- 5.50.** Blocks of apartments or flats is seen as a way of delivering large numbers of homes in an urban built environment, albeit this isn’t always as appropriate in a more rural setting. The skyline of Downham Market built environment is not dominated by high rise buildings and the town does not currently have ‘blocks’ of apartments or extensive high rise commercial buildings. In seeking to maintain the character of the town any future apartment blocks location of key features should be considered early in the design process to ensure that they are well integrated into development proposals and form part of a cohesive and visually appealing environment.
- 5.51.** The Borough Council has identified demand through its register for self and custom build plots in the Borough and has researched the preferences of those on the register. This information indicates that there are 133 individuals interested in self and custom build.
- 5.52.** In terms of the type of self and custom build those on the register⁴ are interested in, 80% are interested in detached houses and 50% are interested in detached bungalows. There is limited demand for other types of housing. Most households have indicated that they would be interested in building anywhere in the borough. Finally, in terms of plot size, demand covers a wide range of plot sizes with 33% of households are looking for a plot of less than 500sqm (0.12acres), 28% look for between 500sqm (0.12a) and 1000sqm (0.25a) and 33% looking for more than 1000sqm.
- 5.53. AMBITION:** This policy seeks through good design principles and their implementation to facilitate high quality and well-designed development.

³ Housing Needs Assessment (HNA) April 2019

⁴ Custom and Self Build Register Action Plan 2018

Policy 1: Development – great places to live

All new development (residential and commercial) will be expected to deliver high quality design, encouraged to use the “Building for a Healthy Life (BHL), principles, “Streets for All, 2018” principles, or subsequent updated documents and standards that replace these, and meet the following criteria to preserve and enhance Downham Market by:-

- 1. designing development layouts to reflect existing residential densities in the locality of the scheme and include, where possible, the principles of dementia friendly communities (as detailed in “Dementia-friendly housing guide, version 3, 2020”), or subsequent updated documents and standards that replace these;***
- 2. ensuring the massing, height, layout, orientation, scale, spacing and location of any proposed development does not result in an unacceptable loss of light or overshadowing, or other adverse amenity impacts on existing residents;***
- 3. providing a mix of housing types and tenures to meet local needs, as well as the wider Borough needs, to include one and two bedroom homes (suitable for first time buyers), starter homes and good quality accommodation for elderly people;***
- 4. encouraging the provision of self-build and custom build plots;***
- 5. designing blocks of apartments or flats and commercial premises to be to a maximum height of three storeys and in keeping with existing surrounding buildings;***
- 6. ensuring all new development which requires a new or additional connection to the public sewerage network will be required to demonstrate that there is sufficient capacity in the sewerage network to accommodate the development or that capacity can be provided in time to serve the development;***
- 7. demonstrating how new homes will integrate with existing homes, the town centre, services and facilities through connectivity with the existing network of footpaths and cycleways;***
- 8. enhancing the safety and security of residents of Downham Market and incorporating crime prevention principles (identified in the “Secure by Design Homes 2019” or subsequent updated documents and standards that replace these); and***
- 9. seeking pre-application advice from the Norfolk County Council Environment Service Historic Environment Strategy and Advice Team to identify archaeological implications for any proposed development.***

5.54. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 4, 6 and 9.

5.55. Policy 2: Distinct Settlements

5.56. Concern has been raised about how Downham Market expands. While it is accepted that growth is required it is felt this growth should be considered and not negatively impact on the feel of the town or the distinct villages in the surrounding hinterland.

5.57. Below is the view looking north from Downham Market with the roof tops of Wimbotsham just visible in the treeline.



5.58. It is recognised that the two key surrounding villages of Wimbotsham and Denver are outside of the Downham Market Neighbourhood Area although it should be possible for development proposals to ensure the separation of the built environment remains and the two villages are not consumed through the expansion of the town.

5.59. Below is a view across to Denver from Downham Market looking south, houses in Denver across the field.



5.60. To preserve the separation **Policy 2** seeks to avoid the coalescence of Downham Market with Wimbotsham to the north or Denver to the south. This aligns to the Core Strategy as illustrated in the Key Diagram: Downham Market Diagram – Figure 9. See Map 3 on page 18.

- 5.61. Below is the only unobstructed view over the Fens looking north from Downham Market towards Wimbotsham.



- 5.62. **AMBITION:** This policy seeks to enable development while maintaining the integrity and distinctiveness of Downham Market and the surrounding villages, ensuring the villages do not get ‘swallowed up’ and become part of an extended Downham Market.

Policy 2: Distinct Settlements

New development will respect and retain the integrity of Downham Market and the surrounding villages of Wimbotsham and Denver as distinct settlements, protecting the character of the Town and the individual villages and, in particular, it is important that coalescence is avoided between Downham Market, Wimbotsham and Denver while any development ensures that Downham Market retains the appearance and character of a separate "market town".

- 5.63. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 3, 5 and 8.

5.64. **Policy 3: Development to conserve & enhance its setting**

- 5.65. As part of good design any future development is expected to seek ways to preserve the existing key features and improve the development proposals by including landscape plans that are mindful for including the existing flora and generate street scenes that have a positive impact.

- 5.66. Making something of key features, mature trees and existing hedgerows should be retained wherever possible and incorporated within design. Where it is necessary to remove any tree of recognised importance it should be replaced with appropriate amenity value.

- 5.67. AMBITION:** This policy seeks to ensure that new development is respectful and maintains the market town feel through appropriate landscaping and preservation of existing hedgerows, trees and other features, such as ponds.

Policy 3: Development to conserve & enhance its setting

All new development (including through conversions, extensions and infill) should preserve and, where possible enhance the Downham Market and its landscape setting by:

- 1. incorporating landscape proposals as an integral part of any development design in order to mitigate any visual impact of the development and that all landscape schemes should be implemented no later than the first planting season following occupation;***
- 2. ensuring boundary treatments reflect the distinct local character in relation to materials, layout, height and design. In areas where there is no boundary treatment and gardens are unenclosed, new development should seek to replicate this openness;***
- 3. seeking to retain mature trees and existing hedgerows. (Development that damages or results in the loss of ancient trees or trees of good arboricultural and/or amenity value will not be supported unless justified by a professionally prepared tree survey and arboricultural statement); and***
- 4. ensuring where removal of trees of recognised importance can be justified replacement indigenous trees of similar amenity value will be planted within the Parish.***

- 5.68.** Contributes and supports Downham Market Neighbourhood Plan Aims a, b and c - specifically Objectives 1, 2, 3, 5 and 6.



5.69. Policy 4: Parking & Roads

5.70. Downham Market is a large town set in a very rural area of west Norfolk that necessitates its residents to predominately rely on their own motor transport as the main mode of travel to get around. Albeit, more sustainable transport modes are seen as an aspiration – the reality is that development must make provision for the movement and parking of homeowners vehicles.

5.71. On-street parking is likely to occur, roads should be designed to safely accommodate unallocated on-street parking of a level to deter indiscriminate parking and the obstruction of footpaths and roads. The level of provision should be determined on a site-by-site basis.



5.72. Parking was repeatedly raised as a major issue during consultations, both in relation to provision and suitability. Many of the roads in Downham Market are narrow and suffer from traffic congestion and the increase in on-street parking and pavement parking in recent years is exacerbating the issue and adding to traffic congestion. This represents a safety risk to pedestrians and other road users; it also presents access challenges for service and delivery vehicles.

- 5.73. AMBITION:** This policy seeks to ensure new roads (even roads that will remain private or unadopted) are constructed to recognised standard and adequate off-road parking is available with new homes to reduce pavement parking and indiscriminate parking.

Policy 4: Parking & Roads
<p><i>All development will be expected to follow the government’s guidance contained in “Manual for Street” and “Manual for Streets 2” or subsequent updated guidance. Development should enhance the highway and transport network in and around Downham Market by:</i></p> <ol style="list-style-type: none"> <i>1. providing, where feasible and practical, car parking for each new dwelling based on the following minimum standards:-</i> <ul style="list-style-type: none"> ➤ <i>one Bedroom – 2 parking spaces;</i> ➤ <i>two Bedrooms – 2 parking spaces;</i> ➤ <i>three Bedrooms – 3 parking spaces; and</i> ➤ <i>four or more Bedrooms – 4 parking spaces;</i> <i>2. providing accessible communal car parking areas of an equivalent provision will be considered as an acceptable alternative in appropriate locations - adjacent to or in front of new homes - that is consistent with good standards of urban design and encourages use;</i> <i>3. designing roads and parking areas within any site to integrate into the town and existing highway network to minimise conflict between vehicles and pedestrians which would be harmful to pedestrian safety, particularly safeguard children in areas where they walk or play;</i> <i>4. designing and building all new roads, even those not adopted, to Norfolk County Council Highways Authority adoptable standard; and</i> <i>5. enabling safe access to bus stops and public transport, designing in measures to remove the opportunity for parking which would be harmful to highway or pedestrian safety or visually intrusive.</i>

- 5.74.** Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 4, 6 and 9.



5.75. **Policy 5: Home Design**

5.76. AMBITION: This policy seeks to ensure that new homes are designed to a high standard, promoting satisfaction and wellbeing to its residents.

5.77. All dwellings should be designed to minimize the use of energy and clean water. The use of renewable energy sources will be encouraged. Careful consideration should be given to the orientation of the principal rooms in new dwellings so that account is taken of future climate change, with passive solar gain and energy efficiency maximised.

5.78. Encouragement will be given to the use of rainwater storage, and ‘grey water’ systems to reduce the amount of water required per household and to provide water storage solutions for gardens and natural ponds to encourage wildlife.

5.79. The amount of space provided in each dwelling must be as a minimum meet but ideally exceed the minimum standards recommended by the Royal Institute of British Architects (RIBA) in *The Case for Space* (2011), or any future standard that supersedes the RIBA. Adequate storage space must be provided in all new developments.

5.80. Garages must be built in direct association with the houses whose inhabitants may be expected to use them. They must be spacious enough to accommodate modern cars and bicycles.

5.81. AMBITION: This policy seeks to ensure that new homes are designed to a high standard, promoting satisfaction and wellbeing to its residents.

<i>Policy 5: Home Design</i>
<p><i>New homes (including those created through conversions, extensions and infill) should be designed to a high standard and be mindful of how residents will live in their homes by following the size guidance set out by RIBA’s <i>The Case for Space</i> (or subsequent updated documents and standards that replace these) by:</i></p> <ol style="list-style-type: none"> <i>1. encouraging the use of and/or generating renewable energy in association with methods to reduce energy demands (such as ‘fabric first’) and increase conservation;</i> <i>2. make use of local and natural materials (such as carrstone), especially those in keeping with the Design Code;</i> <i>3. providing private external amenity space appropriate to the size and type of dwelling, for conversions and flatted developments shared provision of external amenity space will be acceptable;</i> <i>4. enabling direct access to rear gardens via external means;</i>

5. *ensuring where garages are provided they should be located within the property curtilage and encouraged to include an electric vehicle charging point; and*
6. *providing accessible identified screened storage space for refuse and recycling within the property curtilage.*

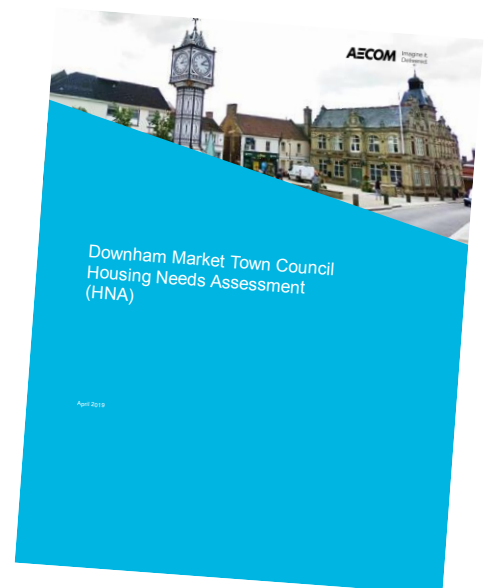
5.82. Contributes and supports Downham Market Neighbourhood Plan Aims a and b - specifically Objectives 1, 2 and 3.



5.83. Policy 6: Affordable homes for Local People

5.84. The Town Council in 2019 commissioned AECOM to complete a Housing Needs Assessment (HNA)⁵ to evaluate the current position and to forecast future needs and requirements.

5.85. Housing, its affordability, availability, type and design are key issues for the future sustainability of Downham Market. Average house prices are too high for those on average incomes to purchase or rent homes. An average house price to income ratio of 1:13, (a ratio of 1:3.5 is recognised as affordable).



⁵ Housing Needs Assessment (HNA) April 2019

- 5.86.** The 2011 Census records 4,637 households across the parish. The household size differs considerably from that of Norfolk and England. Whilst it is recognised nationally that household size is reducing – Downham Market already has significantly more one and two person households when compared to both Norfolk and England see Figure 2.
- 5.87.** In Downham Market the majority of households are homeowners (71%). The proportion of households occupying the social rented tenure (11%) is lower than observed across the Borough (13%); whilst private rented (15.6%) is higher than in the Borough (14.7%) and closer to the national average (16.8%). This could indicate that the private rented tenure is of relative importance and this is reinforced by looking at tenure changes between 2001 and 2011, where the number of households occupying the private rented sector (PRS) has increased by 260%.
- 5.88.** Downham Market has the lowest median household income, c£16,000 per year, when compared across the Borough.
- 5.89.** The average price of a home in Downham Market is – £210,500 in 2017, requiring an annual household income of £47,360. This is clearly beyond the means of household earning around the median. The income needed to afford an ‘entry-level’ property is £36,000 - this would typically be the income needed to buy a terraced property in the town and remains unaffordable for those earning around the median.
- 5.90.** Conclusion (Housing Needs doc) New homes built for owner occupation will only serve a small number of households at the higher end of the income scale. Several factors indicate the need to increase the number of private rented and Affordable Housing homes, these are:-
- low household income
 - the increase in the number of household renting between 2001 and 2011
 - a relative affordability of privately rented properties.
- 5.91.** Affordability of local homes is a significant issue. When comparing average house prices in Downham Market with income levels a ratio of over 1:13 is the outcome. This is significantly higher than the ratio for Norfolk of 1:9 and England of 1:7.
- 5.92.** Policy CS09 of KLWN Borough Council’s Core Strategy sets a requirement to provide 20% affordable houses in developments in Downham Market, split 70% affordable rented and 30% shared ownership. Analysis in the Downham Market Town Council Housing Needs Assessment (April 2019) suggests that 50% of households require Affordable Housing or a home costing less than the average price for a two-bedroom property. The Town Council, through a ‘local connection policy’, supports individuals in housing need with a local connection to access these dwellings.

- 5.93.** Specific information relating to households seeking a home in Downham Market on the Borough Council’s Housing List has been requested but not as yet made available for inclusion in this section.
- 5.94.** This evidence, once available, should demonstrate a significant local need not being met and support a ‘homes for local people’ policy that will address the situation for the local community - this will mean that priority for affordable housing on all new developments will be given to local people.
- 5.95.** Provision exists for such a ‘local letting’ policy within the KLWN Borough Council’s Housing Allocation Policy and existing Government Legislation. Many Neighbourhood Plans have used such a policy to support local people to gain access to affordable housing.
- 5.96.** Providing a balanced mix of dwelling types across the area to meet needs of the local population goes hand in hand with creating and retaining a balanced local community.
- 5.97.** The actual number of affordable homes allocated through this **Policy 6** will be calculated based on identified need recorded on the KLWN Borough Council’s Housing List at the time of the new homes being completed and coming available. It is recognised that some local people may be able to meet their own need in the medium term.
- 5.98.** When a property is allocated under the ‘homes for local people’ **Policy 6** the cascade is used to allocate the property to households on KLWN Borough Council’s Housing List. Therefore, someone on the housing list who has a local connection (as defined within the cascade criteria in **Policy 6**) would be prioritised above someone who does not have a local connection even if their identified need is higher on the KLWN Borough Council’s Housing List.
- 5.99.** The ‘homes for local people’ policy will apply to the lifetime of the development based on local need. This will be managed by KLWN Borough Council, as they already do for affordable housing on ‘exception sites’. Should there be no local need at the point the affordable homes becomes available, homes will be offered to meet a general Borough wide housing need based on the Borough Council’s priorities and those in the highest housing need.
- 5.100. AMBITION:** Affordable Homes for Local People – this policy is seeking to create the opportunity for residents or those with connections to the parish of Downham Market, who are on the Borough’s Housing Register, to have priority to access affordable homes.

Policy 6: Affordable homes for Local People

In order to meet the housing needs of the parish, proposals which make provision by way of a s106 agreement for affordable housing will be made available first to eligible households on the KLWN Housing Register with a local connection to the parish of Downham Market for the lifetime of the

development using the following cascade criteria in order of priority is defined as;

- 1. Resident of the parish of Downham Market*
- 2. Former resident of the parish of Downham Market*
- 3. People who work in the parish of Downham Market*
- 4. Resident of King's Lynn and West Norfolk Borough.*

If at the time of letting there are no eligible households with a local connection, and/or the pool of eligible applicants with a local connection has been exhausted, allocations will be made in accordance with the local housing authority's prevailing housing allocation policy and associated district-wide local connection criteria.

- 5.101.** Contributes and supports Downham Market Neighbourhood Plan Aim a and specifically Objective 2.



5.102. Policy 7: Street Lighting

- 5.103.** Where the Highways Authority does require the installation of highway lighting this should be designed to consider reducing its impact on light pollution and the knock-on effects on safety, wellbeing and wildlife.

- 5.104.** Lighting should only be required where it is needed to enhance safety and security on public highways and footways.

- 5.105.** Through the public consultation, local residents raised concerns about light pollution. In recent years they have noticed that the environment characteristic of our town is deteriorating as both existing and new buildings employ security lighting and fixed lights – with some that stay on all night - as well as decorative floodlighting and signage. These should be discouraged to minimise light pollution, maintain the amenity of neighbours and the character of the area.

5.106. Being mindful of not increasing light pollution, new lighting proposals should be restricted to the minimum necessary for safety and security. It is suggested that, where possible, motion sensors are incorporated with safety lighting with alternative, softer, down lighting encouraged and timers used to reduce light through the early hours of the morning.

5.107. National Planning Policy Framework, paragraph 180, states “...limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

5.108. The Campaign to Protect Rural England (CPRE) believes that darkness at night is one of the key characteristics of rural areas, highlighting a major difference between rural and urban. While most of the Town is urban it should be possible to use reduce the impact of light pollution in the fringe areas.

5.109. The Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights also provides useful guidance for lighting.



5.110. AMBITION: This policy seeks to improve quality, both functionally and environmentally, and efficiency of any new street lighting in Downham Market.

Policy 7: Street Lighting
<p><i>Lighting of public thoroughfares and other public spaces should be designed to reduce as far as possible the impact of light pollution and should incorporate modern technologies, motion sensors, softer down lighting and timers to restrict operating hours and incorporate the following requirements:-</i></p> <ol style="list-style-type: none"> <i>1. fully shielded (enclosed in full cut-off flat glass fitments);</i> <i>2. directed downwards (mounted horizontally to the ground, as low as possible, and not tilted upwards);</i> <i>3. switched on only when needed (no dusk to dawn lamps); and</i> <i>4. white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources.</i>

5.111. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2 and 3.

5.112. Policy 8: Traffic Impact

5.113. As an ancient town full of character the town has many of the roads throughout it that were not designed for modern transport, being very narrow and with limited footpaths.

5.114. As with other towns accessibility and ease of movement are essential not only to the economic and social life of the town and its sustainability but also to the integration of its community.



5.115. Historically what would be considered today as drastic action was taken to alleviate the issue of narrow streets – a road widening scheme in the 1960's saw all the homes to the left on the picture below demolished.



5.116. In the past some improvement to pedestrian safety and vehicular movement to ease of access, mainly to the town centre, has been made. More could be done by expanding the twenty mile per hour zone and installing pedestrian areas in the town centre which is likely to increase footfall and give shoppers a better environment and traders more custom.



5.117. At present most residents use private cars for their travel needs, adding to traffic volumes and increasing pollution with its recognised effect on climate change. Bus services provide access to Kings Lynn and the local villages and ongoing encouragement is given to improving routes and frequency of services.

5.118. It is important that any new development assesses the combined impact of increased traffic movements on all impacts (such as, pollution, congestion, parking, road safety, etc) and identifies mitigation to reduce the potential negative impacts.

5.119. AMBITION: This policy seeks to maintain road safety, where potential additional traffic levels are identified then measures are to be implemented to mitigate any likely impact.

Policy 8: Traffic Impact
<p><i>Major development proposals (10 or more dwellings and commercial floorspace in excess of 1,000m²) will be expected to quantify the level of traffic movements they are likely to generate and its cumulative effect with other developments in Downham Market.</i></p> <p><i>Major development proposals will also be expected to assess the potential impact of this traffic and include appropriate and proportionate measures to mitigate any negative impacts on road safety, pedestrians, safe road crossings, cyclists, parking and congestion within Downham Market.</i></p>

5.120. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 3, 4 and 9. Core Strategy Spatial Planning

5.121. Policy 9: Sustainable Transport

5.122. AMBITION: This policy seeks to improve connectivity within the Town, ensuring any new footpaths and cycleways link with existing networks, and encourage sustainable transport modes.

5.123. With easy access to a fast mainline train service to London, via Cambridge and the A10 truck road, the town is ideally situated as far as transport infrastructure. Improvements to rail service with half hourly service and longer trains will further enhance this asset. Continued bus service to the surrounding villages is essential as this will enable village residents to utilize the services that Downham Market offers thus increasing the economic activity of the town. With limited parking and excessive traffic, the town will need to encourage growth in cycling and walking by improving the existing network of pathways to include all new development.



5.124. New major roads should be designed to allow the free flow of traffic and development proposals should show how they integrate with the existing road, cycle and footpath network.



5.125. Ryston End: Any development in the southeast of town will require a review of the traffic on Ryston End as pedestrians and cyclists will need to use this road when they traverse between the development and the town center. Currently, sections of the road have no dedicated pavement or cycleway, even though this route is part of National Cycle Network route 11.

5.126. Paradise Road: If the town is to encourage pedestrians and cyclist into town then changes need to be made to Paradise Road. The pavement on both sides of the road is too narrow for the safe passage of pedestrians walking in opposite directions, especially if one or both have children or use a mobility scooter. The current configuration of vehicle traffic is two-way, but certain sections of the road are too narrow to allow vehicles to pass each

other safely. One solution is to make vehicle traffic one-way only and to double the size of the pavements on both sides of the road. There should also be room to add a dedicated or combined foot and cycleway.

5.127. AMBITION: This policy seeks to improve connectivity within the Town, ensuring any new footpaths and cycleways link with existing networks, and encourage sustainable transport modes.

<i>Policy 9: Sustainable Transport</i>
<p><i>All development, as appropriate to its scale and location, should include proposals which enhance the attractiveness of walking, cycling and the use of public transport and provides connection with the existing network of footpaths and cycleways, in particular where these link to schools, community facilities and recreational spaces.</i></p> <p><i>All major development proposals should be located where there is access to public transport services.</i></p>

5.128. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 3, 4, 6, 7 and 9.

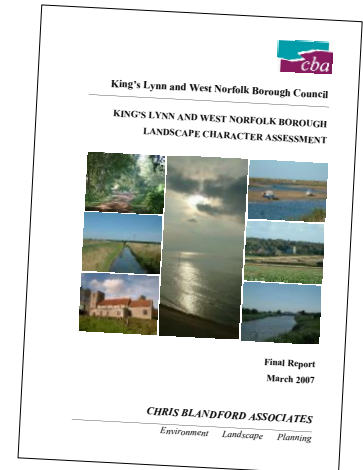
Natural Environment

5.129. The Landscape Character Assessment⁶ of the Borough identifies a number of key features and areas of importance surrounding Downham Market - and it also details landscape planning guidelines, such as:-

- Seek to conserve and enhance the northern landscape setting of Downham Market, and seek to screen (where possible) harsh urban edges and existing visual detractors (such as the sewage works).

5.130. Outlining key forces for change and a number of issues, such as:-

- Potential urban expansion to the east of Downham Market, which may be out of character with the surrounding landscape and settlement character.
- Development pressure around Downham Market (and also regeneration of brownfield sites within Downham).



5.131. The following plans, documents and strategies support Policies 10, 11 and 12:

- A Green Future: Our 25 Year Plan to Improve the Environment, DEFFRA, (January 2018)
- Building for a Healthy Life: (2020)
- Conservation Area Character Assessment (1975)
- DMNP Emerging Policy Statement Discussion Document (January 2021)

⁶ Landscape Character Assessment SPD (2007)

- KLWN Emerging Local Plan Review 2016 – 2036 (2021)
- KLWN Local Development Framework – Core Strategy (July 2011)
- KLWN Site Allocations and Development Management Policies (September 2016)
- KLWN Strategic Flood Risk Assessment Final Report: Level 1 (November 2019)
- Landscape Character Assessment SPD (2007)
- National Design Guide (2019)
- National Planning Policy Framework, NPPF (2021)
- Norfolk LLFA Statutory Consultee Guidance for Planning Document: Version 4 (2019)
- Partnership of Norfolk District Councils – Strategic Flood Risk assessment (2017)
- Rising to the Climate Crisis – A guide for Local Authorities on Planning for Climate Change (2018)



5.132. Policy 10: Managing Flood Risk

- 5.133.** National Planning Policy Framework, paragraph 149, identifies the need to take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply, biodiversity and landscapes.
- 5.134.** The mapping shows that the majority of Downham Market is located in Flood Zone 1. The Flood Zones associated with the Great Ouse River are confined to the west of the town. This is due to the town being on raised ground to the east whilst the Great Ouse River proceeds to inundate a wide floodplain of low-lying ground to the west.
- 5.135.** New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development proposals come forward in areas that are vulnerable, care should be taken to ensure that risks can be managed through suitable mitigation measures, including use of green infrastructure.
- 5.136.** Throughout the policy consultation, residents pointed out that flooding, especially surface water, had become a more frequent event locally and raised concern about the impact development would have in terms of increased flood risk. Of particular concern was surface water drainage and the impact of 'run off'.

5.137. Residents also raised concerns, following a number of newspaper stories, relating to the management of sewage where in recent developments in another District, homes were allowed to be occupied without being connected to a fully operational sewage system. This resulted in the developer using tanker lorries to dispose of sewage and wastewater from residential properties. This is seen as an unacceptable practice, both unpleasant for new homeowners and existing local residents, and increases local HGV traffic movements in the area.

5.138. To ensure wastewater is managed appropriately throughout Downham Market it is expected that new homes will be connected to the sewage system prior to being occupied. The DMNP seeks that this is a planning condition when KLWD Borough Council, the local planning authority, grants planning permission in Downham Market.

5.139. The Lead Local Flood Authority (LLFA) is Norfolk County Council which works closely with the relevant agencies, such as Anglian Water. One of their recommendations is to include policies within spatial planning documents such as Neighbourhood Plans, which reflect outputs and findings of the Surface Water Management Plan.



5.140. Downham Market is included in the Stage 1 Strategic Flood Risk Assessment (SFRA) carried out for the Borough. The SFRA has been prepared with the on-going involvement of Norfolk County Council (as LLFA) and the Environment Agency. It applies the latest climate change allowances to models of river (fluvial) flooding, taking into account the existing information on tidal and coastal flooding, groundwater flooding and surface water flooding (amongst other types).

5.141. The mapping shows that the majority of Downham Market is located in Flood Zone 1. The Flood Zones associated with the River Great Ouse are confined to the west of the town. This is due to the town being on raised ground to the east whilst the River Great Ouse proceeds to inundate a wide floodplain of low-lying ground to the west.

5.142. The SFRA notes in relation to fluvial, tidal and coastal flood risk that here are several watercourses that flow through and from the Downham Market are classed as Ordinary Watercourses; in some cases, these are managed by an IDB. Such watercourses may not have been accounted for in the Environment Agency Flood Zone mapping. There is the potential that the settlement could flood from one or more of these watercourses, independently to tidal flooding.

- 5.143.** All new development within the 1% Annual Exceedance Probability (AEP) flood extent including an allowance for climate change (for the lifetime of the development) must not normally result in a net loss of flood storage capacity.
- 5.144.** In the 1% AEP event a prominent overland flow route has developed in the south of the settlement starting to the west of London Road and flowing west towards the Great Ouse River.
- 5.145.** There are a series of flood walls, embankments and bridge abutments along the Great Ouse River, which have a standard of protection of 1% AEP. However, there remains a residual risk of flooding should the defences be overtopped or fail.
- 5.146.** Mapping shows surface water flood risk in Downham Market consists predominantly of water ponding on roads, gardens and other open spaces throughout the town in the 3.3% AEP event.
- 5.147.** In the 0.1% AEP event at least three prominent overland flow routes are visible within the settlement. All flowing in an east to west direction towards the Great Ouse River and all with the potential to cause flooding to property.
- 5.148.** The KLWN Surface Water Management Plan 2012 identified critical drainage catchments in the following locations:
- Railway Station and Electrical Sub-Station
 - High Street
- 5.149.** Development proposals should be aware of local conditions and requirements set by the Downham Market Group of Internal Drainage Boards. The administration group has published application guidance notes for the IDB which can be found using the following links: <http://www.downhammarketidbs.org.uk>
- 5.150.** The area and level of flood risk is broadly as shown on the Environment Agency Flood Risk mapping with the principle area of flood risk as a result of the above is within approximately 250m of the flood bank to the Relief Channel within the developed area of Downham Market, with the exception of the area in the vicinity of the Willows Nature Reserve and the area in the vicinity of St Johns Business Park. These areas are influenced by the outfall to the Relief Channel on the drain known as Gooles Run.
- 5.151.** Farmland to the north of the Sewage treatment Works provides the principle area of storage to the outfalls to the Relief Channel to the north of Downham Market.
- 5.152.** One other aspect which those undertaking development should be aware, is the requirement to maintain the 9m access zone to the IDB drains. This access being required for maintenance of the drains. The term development is also reference to the installation of infrastructure within those zones, and which can hamper or restrict the IDB in the carrying

out of its statutory duties. Regrettably this has been overlooked within the Downham Market area on several occasions. The inability to maintain the drains increase flood risk.

5.153. Sewer flooding occurs when intense rainfall overloads the sewer system capacity (surface water, foul or combined), and/or when sewers cannot discharge properly to watercourses due to high water levels. Sewer flooding can also be caused when problems such as blockages, collapses or equipment failure occur in the sewerage system.

5.154. Localised sewer flooding problems have been recorded 12 incidents in total in Downham Market⁷ on Anglian Water's register records located at:-

- Maltings Lane
- Oakview Drive
- Paradise Road
- Peverall Road
- Railway Road

5.155. There is relatively little flexibility in how flood risk should be considered. In essence, development should be located away from areas of highest flood risk. A site-specific Flood Risk Assessment should accompany all relevant planning applications. Mitigation of residual flood risk is important and, where possible, developments should reduce flood risk overall.

5.156. Implementation of high quality design should be in keeping with, and sensitive to, its surroundings. The appearance and location of drainage features should be considered early in the design process to ensure they are well integrated into development proposals and form part of a cohesive and visually appealing environment.

5.157. Anglian Water has a pre-planning service, which includes a capacity check to determine the impact of sewage from a proposed development. The assessment should accompany any planning application together with water drainage solutions to be implemented prior to first occupation.

5.158. The intent of the DMNP is to contribute positively towards efforts to reduce the risk of surface water flooding in and around the town. It seeks to encourage a range of assessment and mitigation measures that will ensure any future development, or redevelopment, will not have a detrimental impact on flood risk or wastewater management.

5.159. To help alleviate surface water flooding, development proposals will be required to demonstrate engagement with relevant agencies and incorporate appropriate mitigation measures to reduce surface water run-off, manage surface water flood risk to the development and wider area - such as Sustainable Drainage Systems (SuDS). Seen as the preferred option for surface water control and disposal, SuDS can include permeable surfaces, rainwater harvesting, as well as green roofs and walls.

⁷ Source: KLWN Strategic Flood Risk Assessment (November 2019)

- 5.160. AMBITION:** This policy seeks to ensure that development does not cause flood related problems, especially associated with surface water run-off or sewerage. There is recognition that some open land can perform many functions, such as recreation, biodiversity, wildlife and flood risk mitigation.

Policy 10: Managing Flood Risk

Proposals for development involving new buildings, extensions and additional areas of hard surfacing should give adequate and appropriate consideration to all sources of flooding and proposed surface water drainage; demonstrating that it would:

- a) Not increase the flood risk to the site or wider area from fluvial, tidal and coastal, surface water, groundwater, sewers or artificial sources following, if necessary, the installation of appropriate mitigation measures;***
- b) Have a neutral or positive impact on surface water drainage; and***
- c) Any foul drainage solution must be implemented prior to homes being occupied and include appropriate mitigation of any risk of downstream flooding identified by the sewerage capacity assessment required by DMNP Policy 1 (criterion 6).***

Development proposals must demonstrate that they have taken account of the most up to date information from the Environment Agency, Anglian Water and Norfolk County Council in its role as the Local Lead Flood Agency (LLFA) on the risks and causes of flooding in Downham Market, and how these can be addressed. Applications must also include appropriate measures to manage flood risk and ideally reduce surface water run-off from the development site and wider area, including consideration to all of the following:

- appropriate measures to address any identified risk of flooding (in the following order or priority: assess, avoid, manage and mitigate flood risk);***
- only locating development in areas at risk of flooding where the vulnerability of the proposed land use has been considered and it is compatible with the risk;***
- appropriate allowances for climate change;***
- sustainable Drainage System (SuDS) with an appropriate discharge location, subject to feasibility;***
- priority use of source control SuDS such as permeable surfaces, rainwater harvesting, stormwater harvesting and storage or green roofs and walls. Other SuDS components which convey or store surface water can also be considered;***
- mitigation against the creation of additional impermeable surfaces, attenuation of greenfield (or for redevelopment sites as close to***

greenfield as possible) surface water runoff rates and runoff volumes within the development site boundary; and

- *provision of clear maintenance and management proposals of structures within the development, including Sustainable Drainage Systems elements, riparian ownership of ordinary watercourses or culverts, and their associated funding mechanisms.*

5.161. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 3 and 6.





5.162. Policy 11: Biodiversity

5.163. Existing wildlife ponds, the surrounding hedgerows, trees and undergrowth, and any drainage ditches that help to keep the ponds replenished must be retained as these areas provide a natural environment with abundant biodiversity, that are impossible to replace once they have been destroyed.

5.164. Linkages are seen as being important between any new development, existing homes, schools, shops, town centre and other facilities. Reducing the dependency on the motor vehicles.

5.165. Open spaces within the built-up area help define the character and identity of Downham Market and are equally important to the wellbeing of the community by providing opportunities for formal and informal recreation. **'Green spaces'** are generally accepted as being **'important to the health and happiness of local communities'** promoting wellbeing and deserving special protection. One of the objectives of the DMNP seeks to promote green space and improve access while enhancing nature conservation.

5.166. There are a number of open spaces and green areas enjoyed by the existing community. These areas provide opportunities for both formal and informal recreation. The loss of any of these open spaces would be detrimental to the appearance, character and amenity value of the immediate locality and the town generally. The community wishes to see these spaces protected for future generations. It is therefore important that any development proposals must respect these important areas and seek to further enhance their characteristics, which make Downham Market such a desirable place to live.



5.167. Streets and other public spaces that are attractive encourage social interaction, act as meeting points (thereby reducing isolation) and add to the character of the town.

5.168. **AMBITION:** This policy is seeking to improve access to the countryside and woodland whilst enhancing the rural setting and providing habitats for wildlife.

Policy 11: Biodiversity

Where green infrastructure is provided as part of any new development it should enhance biodiversity and connections with existing open space in and around Downham Market.

All new development should maximise opportunities to enhance connectivity for wildlife via links from the site to existing footpath and cycleway connections to the wider parish and countryside.

Features in developments that encourage flora, fauna, habitat and wildlife (such as ponds, wood piles, hedgehog friendly fencing, bird boxes, swift houses and bat tiles, etc) will be supported

5.169. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 3, 4, 5, 6, 7 and 8.



5.170. Policy 12: Sustainability & Management of Open Spaces

- 5.171. AMBITION:** Sustainability of Open Spaces – seeking to ensure appropriate steps are taken to ensure open spaces (play areas, formal and informal recreational areas, etc) are managed, maintained and funded in a sustainable way.
- 5.172.** As Downham Market continues to grow it is also important to ensure the provision of community facilities increases, including provision for their management and maintenance.
- 5.173.** Proposals for high quality community facilities that encourage day-to-day social interaction or community-based events will be supported. Community facilities are an important focus for the Town Council to support and promote healthy lifestyles, wellbeing and social cohesion.
- 5.174.** As new development proposals come forward they will be required to include and support additional recreational facilities, which the developer will look to pass on responsibility to Borough Council, Town Council or a management company. The Town Council is keen to ensure all open space is managed appropriately and sustainably.
- 5.175.** Local residents have raised concerns about ‘management companies’ having restrictive practices and failing to maintain areas correctly. Of further concern is companies ceasing after only a few years - leaving nobody responsible for ongoing management and maintenance of an area, which would result in the burden of management falling to local residents, the Town Council or Borough Council without provision for future funding to cover associated costs.



- 5.176.** To encourage the appropriate management of amenity space, old and new, for the well-being of residents, biodiversity and assurances about the creation and maintenance of linking green corridors to connect open spaces.

- 5.177.** The setting up of a ‘Good Neighbour Scheme’ - a small but structured group of volunteers - who offer to do simple tasks for those most in need in their community. Community Action Norfolk⁸ is an independent charity formed from the merger of Norfolk RCC and West Norfolk VCA who help facilitate such groups. Whilst beyond the scope of the DMNP this has been included as a project that the community may choose to take forward under this theme.
- 5.178.** With development there will be ‘green’ areas that require management and maintenance that a developer may look to pass the ongoing management and maintenance responsibility to Downham Town Council or Borough of King’s Lynn and West Norfolk Council or a management company.
- 5.179.** Issues have arisen where developers have failed to make adequate provision for the sustainability of recreational and open spaces. This has happened where insufficient funding has been made available or ‘management companies’ have restrictive practices or are wound up and local councils have to step in to ‘pick up the pieces’.
- 5.180.** To find a sustainable solution for this problem, an ambition of the Downham Market Neighbourhood Plan is, where new developments provide elements of green infrastructure, (such as open green space, recreational areas, allotments) the developer will be required to demonstrate an effective and sustainable management programme for those areas.
- 5.181.** One way in which the objectives of policy 11 can be achieved is by a transfer of the land to the ownership of the Town Council or Borough Council with a sufficient capital payment to cover continuing maintenance.



- 5.182. AMBITION:** Sustainability of Open Spaces – seeking to ensure appropriate steps are taken to ensure open spaces (play areas, formal and informal recreational areas, etc) are managed, maintained and funded in a sustainable way.

⁸ www.communityactionnorfolk.org.uk/sites/content/about

Policy 12: Sustainability & Management of Open Spaces

Where new development provides green infrastructure (such as open space, natural green space, recreational areas, etc) the developer will be required to demonstrate an effective and sustainable management programme for each location by having an appropriate legally binding arrangement for management by an established management company with a viable management plan or Local Authority.

5.183. Contributes and supports Downham Market Neighbourhood Plan Aims a, b, c, and specifically Objectives 1, 2, 3, 5, 6, 7 and 8.



Business & Tourism

- 5.184.** Downham Market is a historic market town with a rich history. It was, historically, an agricultural centre, developing as a market for the produce of the Fens with a bridge across the River Ouse.
- 5.185.** The economically active population of Downham Market work in and around the town, its neighbouring villages, and neighbouring towns in North Cambridgeshire and West Norfolk. With direct trains to Cambridge and London there is an increasing number of commuters that work in these cities, as the town can provide for an attractive alternative to these costly cities.
- 5.186.** There are two industrial estates on the edge of town and factory building in Bexwell which provide some local employment opportunities. Education, health and the retail sector provide further indigenous employment along with opportunities in the housing sector. The presence of RAF Marham provides extra economic diversity to the town.
- 5.187.** One area of growing employment is with residents who work from home or are self-employed in professions and services from a home base. While the investment in employment has been limited for many years, the population of the town has rapidly increased, leaving the residence with a predominantly service based economy and little in the way of training opportunities.



- 5.188.** The Retail sector of the town contains an interesting mix of chain stores and independent shops. Among the notable retail outlets are a department store, a furniture store, three supermarkets, a bank, two pharmacies, two opticians, two hardware stores, a petrol station, two cycle repair shops, a garden centre, two bakeries, two butchers, a delicatessen and various small arts and craft stores. Along with other towns throughout the country there is an abundance of estate agents, charity shops, a book shop, hairdressers, restaurants, cafes and takeaway establishments, a post office, a number of public houses and a hotel. On Friday and Saturday there is an active market with various stalls providing fruit and vegetables, fish, and various other products.



5.189. The retention of existing local shopping facilities to provide continued economic activity is seen as vital to ensure the sustainability of the town. There is a desire to retain existing businesses and commercial premises. Through the identification of deficiencies in local services, such as medical and dental facilities, and their support in setting up could help with the creation of more local employment opportunities.

5.190. Downham has suffered from shop closures in recent years with small retail businesses suffering the most, leaving a substantial number of vacant commercial properties. As the town population has grown and changed, so has the expectations of what facilities the town centre should offer. In recent years the town centre and commercial offering has not necessarily kept up with these changes. A wider ranging quality night trade is one area that should be encouraged.

5.191. The town centre, a conservation area, is limited in size and constrained by a shortage of parking. If the centre is to recover a concerted effort is needed to encourage the use of sustainable transport into the town.



5.192. Diversifying the economic base in Downham Market could promote more local employment; tourism nevertheless will continue to support the local economy. Through the community events, residents were supportive of tourism related proposals where there is scope for the community getting year-round benefit as well.

5.193. There is a need to encourage more start-up businesses to broaden the economic base of the town and to reduce the need to travel further afield to work, usually by motor vehicle.

5.194. Home working - proposals for new business development that combine living and small scale employment will be encouraged, provided there is no adverse impact on the character and amenity of nearby houses. To ensure that these businesses remain viable, the town needs to continue to offer a premium broadband service that enables these businesses to compete in the global market.

5.195. The following plans, documents and strategies support Policies 13, 14 and 15:

- Conservation Area Character Assessment (1975)
- DMNP Emerging Policy Statement Discussion Document (2021)
- KLWN Local Development Framework – Core Strategy (July 2011)
- KLWN Site Allocations and Development Management Policies (September 2016)
- National Planning Policy Framework (2021)
- NewAnglian Economic Strategy Evidence Report (Updated 2017)
- Norfolk & Suffolk Unlimited: Economic strategy for growth & opportunity (2017)



5.196. Policy 13: Local Jobs & Employment

5.197. AMBITION: This policy seeks to encourage the creation of local employment that is appropriate to Downham Market, which will strengthen the local economy and improve its sustainability.

<i>Policy 13: Local Jobs & Employment</i>
<p><i>Development proposals that create new employment will be supported and encouraged subject to the following criteria:</i></p> <ul style="list-style-type: none"> • <i>Their size and design respects the immediate surroundings in which they are to be located; and</i> • <i>They do not have a significant impact on the local environment and the amenities of adjacent residential properties or other land uses.</i>

5.198. Contributes and supports Downham Market Neighbourhood Plan Aims b and d - specifically Objectives 3 and 11.

5.199. Policy 14: Retention of Commercial Premises



5.200. AMBITION: This policy seeks to see the retention of retail or services in the town centre of Downham Market

Policy 14: Retention of Commercial Premises

Proposals that seek to retain commercial premises in Downham Market, for commercial activities, will be supported provided they do not have an adverse impact on the local environment or the amenities of adjacent residential properties or other land uses.

5.201. Contributes and supports Downham Market Neighbourhood Plan Aim d and specifically Objectives 10 and 11.

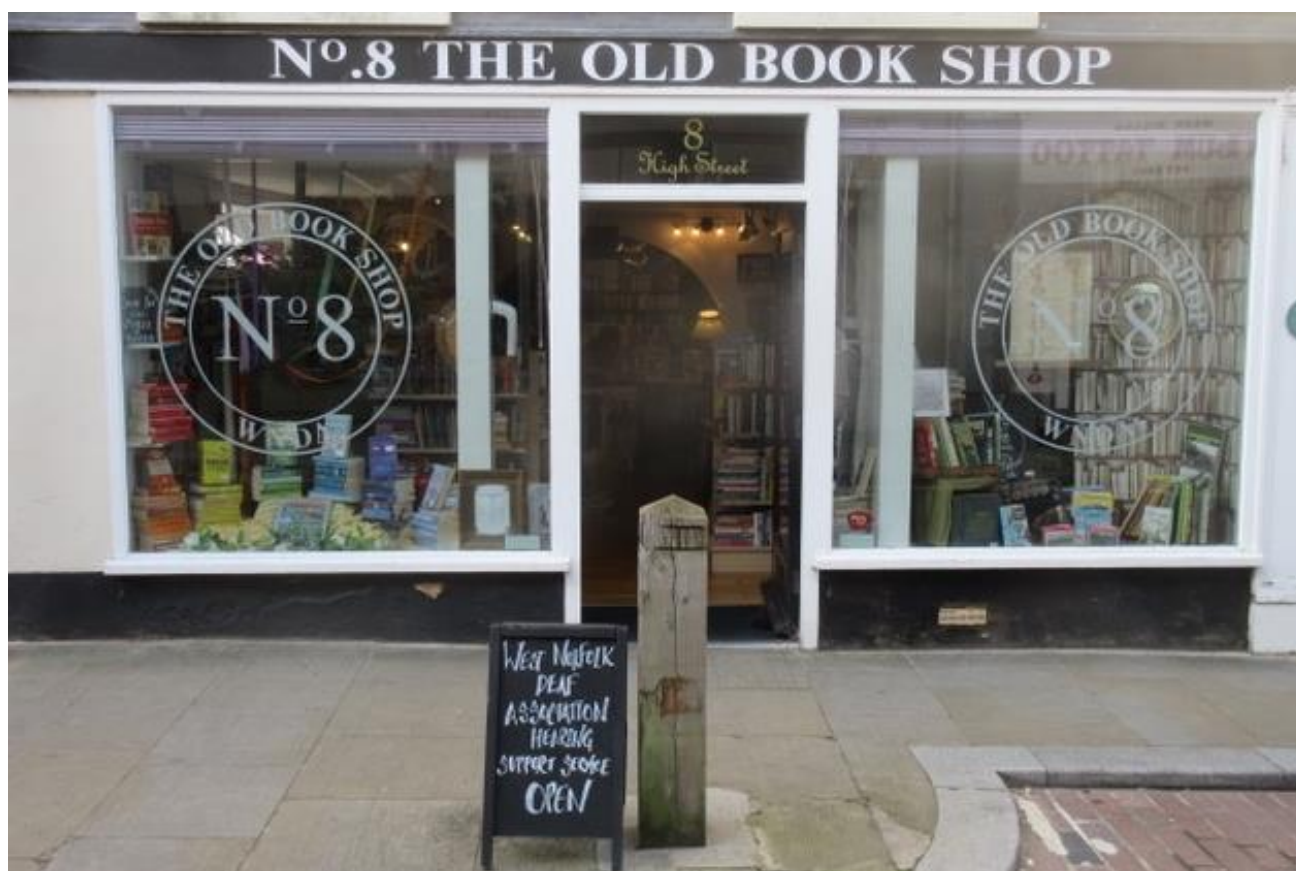
5.202. Policy 15: Tourism

5.203. Tourism is important to the local economy of Downham Market, it forms a part of everyday life in the town and already presents issues and challenges such as congestion, parking and litter.

5.204. Visitor numbers and activity in the town are expected to return to pre-COVID levels as restrictions ease and confidence returns. Seasonal tourist traffic heading to the North Norfolk Coastal area passes by Downham Market, some of which may choose to stop off in the town causing traffic issues on the A10. Especially as the A10 is not dualled and any vehicle breakdown results in long delays.

5.205. Many tourists are drawn to the town by its historic landmarks and photogenic “gingerbread town” reputation. The weekly market is extremely popular and draws visitors and shoppers from far and wide.

5.206. Tourism is an essential part of the town’s life and is crucial to maintaining much of the employment and community income. However, the DMNP recognises that, as important as tourism is to the town, its impact needs to be managed to create the right balance for the resident community and the visitors.



5.207. AMBITION: This policy is seeking to balance the provision of facilities in Downham Market for the benefit of residents, the local community and visitors whilst minimising the social and environmental impact.

Policy 15: Tourism

Development proposals that have the potential to create new or expand existing tourism in Downham Market will be supported and encouraged provided they:

- 1. undertake an assessment (short and long term) of their likely impact – including such elements as traffic, parking, noise, energy consumption, litter and pollution;***
- 2. specify how negative impacts will be managed and/or mitigated; and***
- 3. respect the existing character and design of the Town.***

5.208. Contributes and supports Downham Market Neighbourhood Plan Aims b, c, and d - specifically Objectives 3, 5, 6, 9 and 11.



Section 6: Delivery, Implantation and Monitoring

- 6.1.** The DMNP covers the period 2022 to 2042. It provides direction for change through its Vision, Aims and Objectives.
- 6.2.** Funding to support the delivery of the DMNP will be sought from King's Lynn & West Norfolk Borough Council through a combination of money from the Community Infrastructure Levy, s106 planning obligations / s278 agreements and from other sources as maybe available (such as, grant funding, New Homes Bonus, precept funding, and loans [Public Works Loan Board]).
- 6.3.** The DMNP is, however, a response to the needs and aspirations of the local community as understood today and recognises that current challenges and concerns may will change over the plan period. The Downham Market Town Council, as the Qualifying Body, will be responsible for maintaining and periodically revisiting the DMNP to ensure relevance and to monitor delivery.
- 6.4.** As new challenges and opportunities arise over the plan period the Town Council recognises that there will be a need for flexibility and in this respect the DMNP will be reviewed every five years and, where appropriate, revised.
- 6.5.** Development will take place over the next twenty years, both in Downham Market and in the adjoining area, will have an impact on the community as well as on the physical fabric of the town. Each new development will influence what happens next and as such it is important that these developments are monitored and reviewed against the DMNP's Objectives and against the policies in the DMNP designed to guide their implementation.
- 6.6.** Borough Council of King's Lynn & West Norfolk will determine planning applications in the Downham Market Neighbourhood Area in accordance with the policies of the DMNP and is responsible for monitoring delivery of the development framework.
- 6.7.** The Town Council will also monitor the delivery of policies in the DMNP, maintaining a record of how each policy has performed by influencing planning permissions and supporting the Vision, Aims and Objectives. This will provide a key input to each future review of the DMNP.



- 6.8.** The Town Council will also focus on ensuring that the objectives and benefits for the community are achieved through considered and effective use of Community Infrastructure Levy, planning obligations and S106 payments. Housing and other development will be expected to contribute towards improving local services and infrastructure through the use of Community Infrastructure Levy or planning obligations (via a s106 agreement / s278 agreement) or through the use of planning conditions. It is essential that necessary infrastructure be provided in a timely manner related to the needs of new development and the growth of the area.
- 6.9.** In terms of the key action areas the Town Council's approach to delivery and implementation is to:

Built Environment:

- 6.10.** Proactively work with developers and Borough Council of King's Lynn & West Norfolk to influence growth that is aligned to the local community's needs without increasing the flood risk. To seek high standards of development to provide better homes for people to live in.
- 6.11.** Seek solutions and the timely provision of improvements to Downham Market's infrastructure. Practical steps to improve road safety and reduce the negative impacts of traffic. Challenge those seeking to increase traffic levels, through new development, to understand the wider impacts on the local community. Strive for the delivery of sustainable transport modes.
- 6.12.** Encourage local residents, with housing needs, to register and join the Housing List to enable them to have priority in accessing affordable homes.
- 6.13.** Work with key stakeholders to guide delivery, service improvements and new community facilities to meet the future needs and desires of local residents.

Natural Environment:

- 6.14.** Act to ensure the beauty, natural open spaces, wildlife, built and natural form in and around Downham Market is protected whilst seeking to enhance biodiversity and the surrounding countryside.

Business & Tourism:

- 6.15.** Encourage new and existing businesses to improve local employment opportunities and seek to strengthen the town centre, retail, tourism and the local economy.

Monitoring

- 6.16.** The policies of the DMNP will be assessed against planning permissions granted in the Neighbourhood Area to inform future reviews, understand any unintended outcomes and space any future policy refresh.

Section 7: Document Control

Document History		
Version	Date	Comment
v1.0	01.10.2021	Regulation 14 Pre-Submission Consultation Version issued for consultation with local community and stakeholders.



Appendix 1: Glossary

Term	Description
Affordable Housing	<p>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</p> <p>a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and in this context is known as Affordable Private Rent).</p> <p>b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p>d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p>
Allocation	An area of land identified for development in a development plan. The allocation will specify the type of development that will be permitted on the land.
Amenity	Those qualities of life enjoyed by people, which can be influenced by the surrounding environment in which they live or work. “Residential amenity” includes, for example, a reasonable degree of privacy, freedom from noise nuisance, air pollution etc. normally expected at home.
Area Action Plan (AAP)	Should be used to provide the planning framework for areas where significant change or conservation is needed. A key feature of AAP’s will be the focus on implementation
Area of Outstanding Natural Beauty (AONB)	An area of countryside designated nationally by a government agency as having natural features of exceptional beauty and therefore given the highest state of protection in law and Government policy for their landscapes and scenic beauty
Basic Conditions	<p>The 5 criteria that all neighbourhood plans must conform to. These are:-</p> <ul style="list-style-type: none"> • having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan;

Term	Description
	<ul style="list-style-type: none"> the making of the neighbourhood development plan contributes to the achievement of sustainable development; the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.
Biodiversity	The variety of life on earth or any given part of it.
Biodiversity Net Gain	Is an approach to development that leaves biodiversity in a better state than before. The Environment Bill requires developers to ensure wildlife habitats are enhanced and left in a better state prior to the start of a scheme - to deliver a net biodiversity gain of "at least" 10%. Biodiversity net gain still relies on the application of the mitigation hierarchy to avoid, mitigate or compensate for biodiversity losses.
Broadband	<p>A high-capacity transmission technique using a wide range of frequencies, which enables a large number of messages to be communicated simultaneously. Levels defined through speed achieved, these are:-</p> <ul style="list-style-type: none"> Basic Broadband - speed of 2Mbps to 24Mbps Superfast Broadband - speed of over 24Mbps Next Generation Access (NGA) broadband infrastructure: is a 'wired' technology consisting wholly or partially of fibre optic elements.
'Brownfield Land' or Previously Developed Land	Land, which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape over the process of time.
Built Environment	Surroundings, which are generally built up in character. The collection of buildings, spaces and links between them, which form such an area.
C2 Class Use (Residential institutions)	Use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)). Use as a hospital or nursing home. Use as a residential school, college or training centre
Character	A term relating to Conservation Areas or Listed Buildings, but also to the appearance of any rural or urban location in terms of its landscape or the layout of streets and open spaces, often giving places their own distinct identity.
Climate Change	Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.
Community	(As used in this context) All of those living and working in the Parish of Downham Market. This includes the general public, businesses, community groups, voluntary organisations, developers, statutory agencies, etc.
Community Facilities	Services available to provide for health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. This includes village halls,

Term	Description
	post offices, doctors and dentists' surgeries, recycling facilities, libraries, local shops and places of worship.
Community Infrastructure Levy (CIL)	A tariff-based charge paid by developers and collected by local authorities to pay for infrastructure, (eg. roads, education, etc.). The amount charged is set locally, so varies according to local land values, and works in conjunction with fewer section 106 obligations being paid by the developer. King's Lynn & West Norfolk Borough Council operates a Community Infrastructure Levy charging schedule.
Conservation Area	An area of special architectural or historic interest designated under the Planning (Listed Buildings & Conservation Areas) Act 1990, whose character and appearance is desirable to preserve and enhance. There are special rules on some development in conservation areas.
Core Strategy	This sets out key elements of the planning framework for the Borough of King's Lynn & West Norfolk. It comprises a long-term spatial vision, core aims and strategic objectives for the area, a spatial strategy, core policies and a monitoring and implementation framework. A Development Plan document, and one with which all other Development Plan documents must conform.
County Wildlife Site (CWS)	A site of important nature conservation value within a County context but which is not protected under the Wildlife and Countryside Act. CWS are protected by policies
Curtilage	An area of land, usually enclosed, immediately surrounding a home.
Development	Defined in planning law as "the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land" (see also Permitted Development) and includes both residential and commercial development.
Development Management	The process whereby a Local Planning Authority manages, shapes, and considers the merits of a planning application and whether it should be given permission with regard to the Development Plan.
Development Plan (DP)	This includes adopted Local Plans, and Neighbourhood Plans, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.
Development Plan Documents (DPD)	Development Plan Documents: These are planning documents forming part of the local development framework and which have the status of being part of the development plan. In order to acquire this status they will be subject to independent scrutiny through a public examination. Certain documents within the local development framework must be DPDs, for example Core Strategy, Site Specific Allocations of land and Area Action Plans (where produced). There must also be an adopted Proposals Map, which will be varied as successive DPDs are adopted.
Dwelling	A self-contained building or part of a building used as residential accommodation. A dwelling may be a house, bungalow, flat, maisonette or converted farm building.
Examination	An independent examiner will be appointed to test the Downham Market Neighbourhood Plan against the Basic Conditions, as set out in the Neighbourhood Planning (General) Regulations 2012. If the examiner agrees that the Plan meets the Basic Conditions it may then proceed to a referendum.
Exception sites (rural)	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
Excluded Development	As defined in the Localism Act 2011 - The following development is excluded development for the purposes of section 61J :-

Term	Description
	<ul style="list-style-type: none"> a) development that consists of a county matter within paragraph 1(1)(a) to (h) of Schedule 1, b) development that consists of the carrying out of any operation, or class of operation, prescribed under paragraph 1(j) of that Schedule (waste development) but that does not consist of development of a prescribed description, c) development that falls within Annex 1 to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment (as amended from time to time), d) development that consists (whether wholly or partly) of a nationally significant infrastructure project (within the meaning of the Planning Act 2008), e) prescribed development or development of a prescribed description, and f) development in a prescribed area or an area of a prescribed description.
Flood Risk	<p>Zone 2 (Medium Probability): Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.</p> <p>Zone 3a (High Probability): Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.</p> <p>Zone 3b (The Functional Floodplain): This zone comprises land where water has to flow or be stored in times of flood.</p>
Green Corridors	Avenues for wildlife movement, often along streams, rivers, hedgerows or other natural features, which connect green spaces together.
Green Infrastructure (including Green Space)	Comprises green spaces and interconnecting green corridors in urban areas, the countryside in and around towns and rural settlements, and in the wide countryside. It includes natural green spaces colonised by plants and animals and dominated by natural processes and man-made green spaces such as areas used for outdoor sport and recreation including public and private open spaces, allotments, urban parks and designed historic landscapes as well as their many interconnections (footpaths, cycleways and waterways).
Greenfield Land	Land, which has not previously been built on, including land in use for agriculture or forestry and land in built-up areas used for outdoor sport and recreation (including public and private open space and allotments). Does not include residential garden land.
General Conformity	All planning policy documents must align with the expectations of the National Planning Policy Framework. This is known as general conformity.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
Housing Needs Survey	Used to identify the local housing needs, current and predicted, for the Parish.

Term	Description
Infrastructure	The network of services to which it is usual for most buildings or activities to be connected. It includes physical services serving the particular development (e.g. gas, electricity and water supply, telephones, sewerage, etc.) and also includes networks of roads, public transport routes, footpaths etc.
Listed Building	A building of special architectural or historic interest. Listed buildings are graded I, II* or II with grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures. English Heritage is responsible for designating buildings for listing in England. Alteration, demolition or extension of such a Listed Building requires special consent.
Local Development Framework (LDF)	The old-style portfolio or folder of Development Plan Documents and Area Action Plans, which collectively set out the Spatial Planning Strategy for a Local Planning Authority area. Local Plans have now replaced the Local Development Framework.
Local Plan	The plan for future development of the local area, drawn up by the Local Planning Authority in consultation with the community. In law this is described as the Development Plan documents, adopted under the Planning and Compulsory Purchase Act 2004. Current Core Strategies or other Planning Policies, which under the regulations would be considered to be Development Plan documents, form part of the Local Plan. The term includes old policies, which have been saved under the 2004 Act.
(The) Localism Act 2011	An Act of Parliament that became law in April 2012. The Act introduces a new right for local people to draw up 'Neighbourhood Development Plans' for their local area.
Material Consideration	A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.
Mixed Use (or Mixed Use Development)	Provision of a mix of complementary uses, such as residential, community and leisure, on a site or within a particular area.
National Planning Policy Framework (NPPF)	First published in March 2012, revised in 2018, 2019 and July 2021, the document consolidated Government guidance on how the land-use planning system should work in England. It must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
National Planning Practice Guidance (PPG)	The national PPG is online guidance that should be read in conjunction with the NPPF.
Nationally Significant Infrastructure Project (NSIP)	The administrative and legal process set-up by Central Government for determining planning applications to major infrastructure schemes, like roads, ports, and power stations.
Neighbourhood Plan	Introduced by the Localism Act 2011, also referred to as a Neighbourhood Development Plan. The purpose of the Neighbourhood Plan is to give local people greater ownership of the plans and policies that affect their area. It is a legal planning document against which planning applications in the Parish of Downham Market will be determined.
Open Space	All space of public value, including public landscaped areas, playing fields, parks and play areas. Not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation or act as a visual amenity and a haven for wildlife.
Permitted Development	Certain categories of minor development as specified in The Town and Country Planning (General Permitted Development) (England) Order 2015, which can be carried out without having to first obtain specific planning permission. This may include specified building guidelines or change of use.

Term	Description
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning Obligation	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Principal Residence	A principal residence is the primary location that a person inhabits, also referred to as primary residence or main residence. It does not matter whether it is a house, apartment, trailer, or boat, as long as it is where an individual, couple, or family household lives most of the time
Protected Species	Plants and animal species afforded protection under certain Acts of Law and Regulations.
Ramsar Site	Area identified under the internationally agreed Convention on Wetlands of International Importance (signed at Ramsar in Iran), focusing on the ecological importance of wetlands generally.
Referendum	(As used in this context) A local referendum, organised by King's Lynn & West Norfolk Borough Council, where residents of the Parish of Downham Market (who are on the electoral register) will be asked to vote on the Neighbourhood Plan.
Renewable Energy	In its widest definition, energy generated from sources, which are infinite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass etc.
Section 106 Agreement (S106)	A legal agreement under section 106 (or S106) of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure certain extra works related to a development are undertaken.
Section 278 Agreement (S278)	Section 278 (or S278) is a section of the Highways Act 1980 that allows developers to enter into a legal agreement with the Highways Authority to make alterations or improvements to a public highway, as part of a planning application.
Sequential Approach / Sequential Test	A planning principle that seeks to identify, allocate or develop certain types or locations of land before the consideration of others. For example, ensuring land with no flood risk is developed before land with flood risk.
Settlement Boundary	A line that is drawn on a plan around a settlement, which reflects its built form. It is a policy tool reflecting the area where a set of plan policies are to be applied. In general, there is a presumption in favour of development within the settlement boundary. Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated through other policies of the Development Plan.
Site Allocations DPD	Identifies or allocates areas of land for specific types of development (eg. housing, employment, community facilities, etc.) Linked to the requirements of the Core Strategy. It also includes the definition of development boundaries or settlement boundaries.
Site of Special Scientific Interest (SSSI)	SSSIs are protected by law to conserve their wildlife or geology. Identified by Natural England as requiring protection from damaging development on account of its flora, fauna, geological and/or physiological features.
Special Area of Conservation (SAC).	Special Areas of Conservation are defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1,000 species listed in Annex I and II of the Directive, which are considered to be of European interest following criteria given in the Directive.

Term	Description
Special Protection Area (SPA)	Special Protection Areas are strictly protected sites in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (listed on Appendix I of the Directive), and for regularly occurring migratory species.
Stakeholder	(As used in this context) any individual or organisation that has an interest in development matters relating to part or all of the Parish of Donham Market.
Statement of Intent	A formal statement that the author has a serious intention of doing something under specified conditions, and at a specified time.
Statutory Body	A government appointed body set up to give advice and consulted for comment upon development plans and planning applications affecting matters of public interest. Examples of statutory bodies include Environment Agency, Health & Safety Executive, Historic England, Natural England and Sport England.
Strategic Environmental Assessment (SEA)	A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
Supplementary Planning Document (SPD)	Documents, which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the Development Plan.
Sustainable Development	Meeting people's needs now, socially, environmentally and economically without jeopardising the needs of future generations. There are three dimensions to sustainable development as seen in paragraph 7 of the NPPF: economic- contributing to a strong, competitive economy; social-supporting strong, vibrant and healthy communities and environmental-contributing to protecting and enhancing the natural, built and historic environment.
Sustainability Appraisal (SA)	Sustainability Appraisal: Appraises policies to ensure they reflect sustainable development objectives (social, environmental and economic factors). Required by the Act to be undertaken for all local development documents. They ensure compliance with EU and UK legislation requiring Strategic Environmental Assessment.
Sustainable Drainage Systems (SuDS)	Efficient drainage systems, which seek to minimise wastage of water, including the use of appropriate ground cover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the development. Designed to minimise the impact of development on the natural water environment.
Traffic Impact Assessment (TIA)	An assessment of the effects upon the surrounding area by traffic as a result of a development, such as increased traffic flows that may require highway improvements.
Travel Plan	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.
Tree Preservation Order (TPO)	A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to an order may not normally be topped, lopped or felled without the consent of the Local Planning Authority.
Windfall Sites	Sites, which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.

Appendix 2: Reference Documents and Resource List

1. A Green Future: Our 25 Year Plan to Improve the Environment, DEFFRA, (January 2018)
2. Building for a Healthy Life: (2020)
3. Dementia-friendly housing guide (2020)
4. Conservation Area Character Assessment (1975)
5. DMNP Emerging Policy Statement Discussion Document (January 2021)
6. Downham Market Network Improvement Strategy NCC (April 2020)
7. Historic England - Streets for All (March 2018)
8. Housing Needs Assessment, HNA (2019)
9. KLWN Emerging Local Plan Review 2016 – 2036 (202
10. KLWN Local Development Framework – Core Strategy (July 2011)
11. KLWN Self-Build & Custom House Building Action Plan (2018)
12. KLWN Site Allocations and Development Management Policies (September 2016)
13. KLWN Strategic Flood Risk Assessment Final Report: Level 1 (November 2019)
14. Landscape Character Assessment SPD (2007)
15. Localism Act 2011
16. National Design Guide (2019)
17. National Planning Policy Framework, NPPF (2021)
18. NewAnglian Economic Strategy Evidence Report (Updated 2017)
19. Norfolk LLFA Statutory Consultee Guidance for Planning Document: Version 4 (2019)
20. Norfolk & Suffolk Unlimited: Economic strategy for growth & opportunity (2017)
21. Office of National Statistics (ONS)
22. Partnership of Norfolk District Councils – Strategic Flood Risk assessment (2017)
23. Planning Policy Guidance (PPG)
24. Rising to the Climate Crisis – A guide for Local Authorities on Planning for Climate Change (2018)
25. Secure by Design Homes 2019 Version 2 (March 2019)
26. Town & County Planning Act 1990
27. Zoopla (web-based housing & rent pricing)

Appendix 3: Downham Market – a brief history

Downham Market stands on rising ground overlooking fertile Fenland. The recorded origins of the town from dated habitat and other remains, are sparse but some are recorded as early as the Bronze Age, with some Roman finds as well.

The town's name means 'settlement on a hill', and there has been a documented settlement on the site for over 2000 years. It largely owes its initial foundation and development to the routeways that grew up around the fen shore lines, upon which people would have travelled in the Bronze age.

The evolution of the town over a long period can still be seen today, because, if you strip back the modern development the cruciform structure of the town may be discovered. The topology of the streets etc., developed in part, as a response to this i.e., the four arms that make up the basic infra structure of the town can still be traced.

However, for the early settlers, it was a very practical location on which to set up home. It offered views over the Fens, with the opportunity, once so crucial to settlers, to see the approach of potential enemies. As the surrounding area was flat and it stood on one of the few areas of land above the level of the Fens, the settlement was immune from the floods that, until approximately 300 years ago, were commonplace in the area. Add this to the inter connectivity of the shore line paths and its place as a settlement would have seemed quite logical.

The relationship of Downham to the waterways has always been strong and was a significant factor in its initial economic and social development. It was from Downham that goods, once brought in from the hinterland, were dispatched all around the country, and even, for example, out to Bishops (later Kings) Lynn, for world trading.

The area around the river would have, over the centuries, developed extensive warehousing and grazing facilities to ensure livestock and goods were safely stored and promptly dispatched and incoming goods forwarded to their inland destinations.

Areas such as the Green outside Barker Brothers builder's merchants and opposite Dial House, are all that remains of the cattle grazing areas where herds were held safe from floods, prior to their onward transportation by water. Buildings such as Dial House also bear witness to the 17th century buildings that once existed in the area.

The arrival of the railway in 1847 spread the economic development of the town from the river towards the centre where much of the town's mid – late 19th century development and prosperity occurred. These buildings can still be seen today and may be traced through the extent of the conservation area, which runs from the railway station to the town centre. It is also expressed in the richness of such buildings as the Town Hall which, among many other functions, served as a corn exchange, supporting four corn merchants, and the town clock, an iconic feature of the town. Historically, a charter from Edward the Confessor in 1053 lists the rights and liberties he granted to Ramsey Abbey to the control of the waterways in Downham and provides an indication of the river's importance in the area, prior to the arrival of the railways.

The Abbots were charged with the development of the area and the safe entry into the settlement via the river. Records indicate that substantial buildings existed on the riverside, i.e., a hermitage and a bridge, which would have been a key crossing point for travellers and traders. The protection, and indeed promotion, of the town by the Abbey helped the settlement to flourish and would have helped the market to become fully established and flourish under their protection.

Downham Market is mentioned in the Domesday book under its old name and in 1205 was granted permission by King John to hold an annual fair, he also granted the town the permission to erect and use public gallows!

Geographically however the rivers changed their course around this time and the wash changed as well (hence the non-recovery of Kings Johns treasure). This did not impact on the importance or prosperity of the Town.

The start of the 15th century saw the re-development of the settlement's church, moving away from its Norman origins and becoming a building created in the English style. Some of the ancient features are still discernible. It has, however, a unique location in the town, being set on the highest, with views of the Fens - now becoming more obliterated by housing development.

During the 17th century, the Earl of Bedford and his gentleman adventurers financed the first major plan to drain the Fens, with work undertaken by the Dutch engineer Cornelius Van de Muyden. Downham Market benefited from the increased prosperity that resulted from the work to protect the area from flooding. This continued, consistently, into the middle of the 20th century, with the creation of the relief channel, which runs from Denver to Saddlebow, Kings Lynn. This has managed effectively to control the draining of the Fens and prevent major flooding.

However, the problem of flooding is returning to the area. This has occurred for several reasons, climate change; poorly designed and thought through housing developments (building on water meadows and open ground that once absorbed surface water) and a significant net loss of natural habitat, aggravated by poor drainage structure, and indifferently managed, out of date sewage systems is bringing this matter ever increasingly to the fore.

The Market in Downham Market

Originally created by charter, during the reign of Edward the Confessor and probably at the behest of the Abbott of Ramsey, Downham has had a market in continuous operation, for over a thousand years, ensuring that it is one of the oldest markets in Norfolk.

More recent history shows the market was operated from the mid-19th to mid-20th century by a market company which ceased trading in 1937. That year, the old Downham Urban District Council (UDC) took over responsibility for the market. Downham UDC ceased to exist, in 1972 when it was dissolved, following local Government reform. Responsibility for the market was vested in the newly created West Norfolk Borough Council.

In 2001 Downham Market Town Council, took over responsibility of running the market, from the Borough Council and the Market now runs on Friday and Saturday through most of the year.

Other markets

The town has a long-held reputation for its butter market and the sale of cattle and horses.

Butter Markets

The butter market operated until the early 19th century, when local transport by boat, proved more reliable than road haulage for such fresh produce. Each Monday morning saw several carriers taking loads of butter from the area to Cambridge, by boat, for its onward journey to London by road.

At its peak 3000 casts or firkins each containing 56 pounds (i.e., a total of 168,000 pounds) of butter went from this region and were transported to London supporting thousands of households.

The return journeys would have brought goods into Downham, for purchase by local tradespeople or private buyers, clearly demonstrating the importance of waterways in transporting and distributing goods around the country.

The butter market likely dwindled and died out because of the changes in agriculture practice which saw the increase in wheat production and the reduction of dairy farming by the start of the 19th century.

Horse Markets

Horse markets were originally held on the 3rd of March or on St Winhold's day, originally between the villages of Barton Bendish and Wareham. The event became known as the St. Winhold's Fair. This moved to Downham Market in the early 1800s. At its height more than 10,000 horses were bought and sold through the fairs. During World War, one thousand were sold to the army and saw service on the Western Front never to be returned to England.

As the 20th century progressed the fair dwindled and died as the need for horses as a form of transport and agricultural power diminished. Downham Market Town Council revived the connection the town has with horses by creating a celebration of the fair and the horse in the early part of the 20th century and now holds regular processions, in March, as part of its civic calendar, known as the St Winhold's Fair.

NB St Winhold himself is not linked to either horses or indeed Downham Market. He was a Brittany based monk who established several monasteries in that part of France, in the 6th century AD. He is primarily linked to issues around windy weather and people praying to him for children. A far cry from being a patron of the horse. The ongoing mystery, of course, is how did his name become linked with this area and this form of celebration?

Rabbits and Downham Market

Downham was, during the mid-Victorian period, a hub for the onward sale and transportation of rabbit. A Victorian delicacy, it was useful, not only as a food but also, for its skins and fur. A strong seasonal trade existed, transporting them from the local warrens, where they were carefully bred in controlled conditions, to London. Wildfowl were also farmed and sold on in this fashion but to a lesser extent.

Notable Landmarks of the Parish



The Town Clock

Downham's attractive black and white clock tower overlooks the marketplace. It was presented to the town in 1878 by Mr. James Scott who was a Grocer and Draper of the town. The original price was £450 (c£50,000 in today's values) and built by William Cunliffe of London but installed by local ironmongers. It has a square gabled clock face with four dials. Since it was erected, it has changed its appearance on several occasions. Originally a bronze and green colour, its current colour configuration, with various lights around the clock face and base are of more recent in origin. It was overhauled and renovated in July 2021.

The Town Hall

Another noteworthy feature in Downham Market is the Town Hall, Built between 1887 and 1888, as part of the Queen's Jubilee celebrations, it used local white brick and Carstone. The latter was quarried in the town, for the construction. Whilst it was designed by London architects, the builders were local and were still in business until the early 1980's.

The money to build and decorate it was raised by a combination of private and public subscription, organised through the Town Hall Company. The final cost of the building was £1,700, (£200.000 in today's money). The fixtures and fittings were paid for, it is believed, by the proceeds of a charitable

bazar. It is now owned by Downham Market Town Council.

Originally created for multiple use i.e., corn hall, council office, reading and quiet rooms, concerts etc it has remained a much-loved building at the heart of the community, since its official opening in 1888. It hosts multiple events, community groups and talks, as well as playing a crucial role in the civic life of the town.



OPENING OF THE "NEW" TOWN HALL APRIL 4th 1888

In 2021 it served as a major vaccination centre as part of the national and regional response to COVID-19. It will require substantial renovation and repair work, going forward, to secure its future role and purpose in the community.

The Conservation Area

This is an area that includes Railway Road; the Howdale; the Marketplace; the High Street; Bridge street; a small area of London Road and a part of Paradise Road. It contains 119 listed buildings (all grade II), such as Dial House: Bank House and the Crown Inn.

Other grade I and II buildings, such as St Edmund's Church and Crow Hall, lie outside this area. Little is made of the heritage these buildings represent, many of which are still commercial properties with a trading history that goes back to the year that they were built. A significant number of the shops that once existed in Bridge Street, for example, have been turned into private dwellings

The area has several unique features that led to the conservation designation. An important such feature was that many of the buildings were built of the local Carstone. The use of this distinctive stone led to Downham being referred to at one time as the gingerbread town.

St Edmunds Church

St Edmunds church sits on the highest point within the parish. The earliest parts of this Carstone Church may be dated back to the Norman Period. It would have replaced much of the original, wooden (Saxon), structure. Some of the original parts of the earlier (Norman) church were reset into the building at a much later date.

The Norman church may have been cross shaped with a tower in the centre. The current tower is unusual in its shape and design and was added in the 13th century. The church contains important examples of mediaeval stained-glass windows, the most significant of which is to be found in the set of 15th century glass panels, which are in the West window below the bell chamber

Most of the present building dates from the significant rebuilding project that was undertaken in the late 15th and early 16th centuries. The 18th century West gallery was a high-quality addition to the church, done at a time when churches, generally, were not being expanded. It underwent further restoration in 1873 when the chancel was built.

T

he physical appearance of St. Edmunds, today, is one of an attractive Carstone building, with a lead covered Spire crowning the squat tower. It is not an urban church, but it is nonetheless one full of character and with interesting features.

St Mary's Church

The Church of Saint Mary the Virgin at Bexwell is one of the 124 round tower churches still to be found in Norfolk and is listed by the Church Round Tower Trust. It is an interesting small parish church; in that it is made of the local Carstone. Part of the North and South walls still reflect the Saxon origins of the church.

In 1986 it was saved from closure after 100 local people came together to ensure it remained open. The local community re roofed the whole church, installing new electrics and a lightning conductor,

mended the windows and dealt with the damp. Many fundraising events, from jumble sales to flower festival weekends, etc, were held to raise funds to keep it open and functioning as a parish church. Special services, commemorating it as the Parish Church for the nearby RAF Bexwell, have been held and its role in the war as the base church is to be found in a blue board at the head of the drive.

Nonconformist worship

Non-conformist worship in Downham market had a long and strong tradition. At one stage, there were six different faiths being practised in that tradition which embraced for example Wesleyan, two types of Baptists and several examples of Methodism, etc.

The Mount Tabor Free Methodist Chapel is an example of the large chapels that were built to accommodate these worshipers in the mid to late nineteenth century. It was built in 1859 and could accommodate up to 450 people every Sunday. Between 1845 and 1895 various other chapels were built in the town for congregations that ranged between two and five hundred worshipers. Up to a thousand worshippers of the nonconformist tradition would use them on a regular basis. That a Non-Conformist chapel of rest was built alongside the regular church chapel of rest is another indicator of the strength of that movement during the Victorian and Edwardian eras.

The built heritage of the non-conformist faiths can still be seen in various buildings around the town i.e., in the Reed's storage shed, bluebells florists and as the private residence in the old mount Tabor building.

The Willows

Downham has a nature reserve, which was once one of the three town brickfields, it has become a field in trust site, to protect its biodiversity and role as a drainage conduit for the town. It is currently managed by the West Norfolk Borough Council and a team of local volunteers, who ensure its ongoing care and maintenance.

The Howdale

The Howdale is an open space, of approximately six acres, managed by the West Norfolk Borough Council. There is a debate locally regarding the origins and ownership of this area. The most common version says it was an alleged gift to the parish in 1692 by "Misses Howee and Dallee" requesting their names be remembered in return. There is currently no evidence to support this bequest.



Another version says that land was given to the town by Sir Thomas Hare Lord of the manor of Stow Bardolph. Whatever the origins of the gift, the area remains a loved and much used open space – one of the very few remaining spaces of substance left to the town.

The Market Square

The market area in the town centre was once quite small, and it is hard to imagine 1500 rioters assembling there in 1815 during the Blood and Bread riots. It was enlarged from 1830 onwards. A popular dress shop owned by Mrs Emery was demolished as part of the enlargement and to create space for the Town Hall. She was well compensated, and a local passage was named after her which subsequently became Scots Terrace. The remaining building was latter taken over by Harry Reed in 1904 when he moved up from his railway road shop (subsequently a barber and now a private residence). Reeds still trades today, from the same premises, and the original house may still be seen.

Smaller landmarks

Remains of the workhouse

In 1836 and 1837 Downham built a workhouse, which cost the parish £5,000. Although apparently costly it in fact saved the parish substantial sums of money as it no longer had to provide outdoor relief for people who were eligible to claim it, and which, in any event, had been abolished two years previously



Like the Town Hall it was built in white brick and Carstone (mined from the Howdale area of the town). The 1851 census shows that approximately 12% of the population of the town was in the workhouse, a testament to the overall poverty present in the area at the time.

The system of poor relief ended in 1945 with the founding of the new welfare state. The Union House became an Old People’s home before its demolition in 1967 and replacement with the High Haven Care Home. All that remains of the old workhouse are the gates leading to it and the terrace of buildings running from London Road up towards the gates.

Dial House

The river area is recorded as having several substantial buildings in its proximity and along the shore line, until the mid-nineteenth century, most of which have now gone. However, traces of these buildings can still be seen in buildings such as the current Dial House and Garden centre opposite Barker Brothers builders’ merchants.

These 17th century buildings face the green area and are two former maltings which are now absorbed into the garden centre. The actual malthouse building, which was built to receive barley, brought by river from the fens to be malted and then shipped to Lynn, is built next to them. Firstly, known as Maltsters House it joins the malting buildings and traces of the original 17th century

brickwork can still be seen. Maltsters House became Dial House, (after the sun dial on the buildings wall) and a Quaker school in 1811. It achieved grade II status in 1976.

N.B The main Quaker meeting house was further up the road in Bridge Street, with an extended Quaker burial ground that may be found behind it. The Quaker chapel was converted into a library and is now the Salvation Army citadel.

Priory House

Priory house is one of the oldest houses in the town although there is no evidence for a Priory in Downham. The building came into existence in the 17th century. Prior to its conversion into a private residence, it was an office for a prominent firm of local solicitors.

Heygate's Mill

Heygate's mill was originally known as Bird's Mill and was built in 1851, primarily with a view to making use of the recently established railway, to move bulk milled items. Milling has been consistent on the site, ever since one of the owners of the mill was quite famous, as he survived an encounter with the German Air Force's Red Baron fighter ace, in September 1917.

The mill was originally steam driven, until 1943, when it underwent its first major conversion. The Bird family eventually sold to the Heygates in 1957 and the mill has been known as Heygate's mill since then.

Schooling in Downham Market

There is a long tradition of private education in Downham market, partly prompted in response to various 19th century education acts. There are many records that indicate private individuals as well as the churches ran schools and educated the children of the area, boys dominating the pupil rolls.

Little physical evidence of these schools now exists and what buildings do exist from that era, that were used as schools, are now private dwellings (Dial House for example). The 1945 Education Act encouraged the growth of schools in the area, most notably the establishment of the secondary school, in the 1950s, on the Bexwell Road site. It was originally a segregated school (although there was no segregation at the Grammar School!) but merged into one unit in the 1980s the former Grammar School becoming a sixth form site and one school for 11+ education in the town.

There are currently two primary schools in Downham market: Hillcrest and Nelson Academy (formerly Clackclose Primary School).

Of the two the former, Clackclose Primary School is architecturally the more interesting. Originally named after the civil administrative area of the Clackclose 100, it opened in 1873 on Snape Lane. Later, it was moved to its current site when the building became unfit for the purposes of schooling. An infant's school opposite the Primary school was housed in Nissan type huts and was subsequently demolished and made way for a new doctors surgery.

War Memorial

The town's War Memorial stands at the junction of London and Church Roads. It was dedicated in October 1921 to the dead of World War One. Paid for by public subscription it was built by John Long, a local stonemason.

The memorial originally commemorated 73 local servicemen, who fell during the First World War, with the names of the dead of World War Two added later. In 2005 Evelyn Merrell, who died in 1918, and was a member of the women's Royal Air Force, was belatedly added to the list of names.

The memorial bears the crown and arrows symbol of the town and of the martyrdom king St Edmund of East Anglia, to whom the local Anglican church is dedicated.

RAF Bexwell

RAF Bexwell opened as a satellite station to RAF Marham, in the summer of 1942. It was equipped with three concrete runways, one of which was over 1,900 yards and two that measured 1,400 yards.

The first operational squadron at the station was 218 squadron, which arrived from Marham in July 1942. Various squadrons operated out of Downham the last being the 608 and 635 Squadrons, both being disbanded in the late summer of 1945. 170 aircraft either failed to return or crashed during the operations from RAF Downham including one that crashed into Bawdswell church.

After closure as an operational airfield in 1946 the airfield remained in a derelict state until it was finally sold in 1957. In approximately 1950 a large proportion of the domestic site was redeveloped as a short-term housing estate renamed Stone Cross estate which finally closed in 1963.

The airfield remained almost intact, until the construction of the Downham Market bypass the A10 in the late 1970s. Much of the runways was broken up and used as hardcore for the bypass. Today much of the site has been returned to agricultural use, with the technical site becoming an industrial estate. Adjacent to the site is Saint Mary's church Bexwell and opposite the former guard room a small plaque may be found to commemorate the station's existence.

The Old Fire Station

The old fire station, now the home of the Downham Market Heritage centre, was the home of the retained Fire Chief for over 70 years after it was converted from the cottages of Ravens Row, some of whose walls were incorporated into the building. The station was decommissioned as a full-time fire station but was kept for a long time as the home of the retained fire-fighting service before its relocation to a new building in London Road.

The Heritage Centre opened in 2015 after a significant fund-raising effort and rebuild of the then derelict building

The Railway Station

The prosperity of Downham was furthered with the building of the Ely to Kings Lynn railway, which reached Downham market in 1847. It currently runs through Downham on the London to Kings Lynn route. The station has regular services to London's Kings Cross, via Cambridge. This means that Downham has now become a popular commuter town.

The signal box is one of five exceedingly rare examples across the region to have been granted two listed statuses, granted in 2013. The department for culture media and sport listed 26 signal boxes across the country as part of a joint project between network rail and English Heritage, to secure the nation's railway signalling heritage. Downham's signal box was built in 1881 for the great eastern railway.

As well as the commercial warehousing buildings that grew up in the area as a response to the railway, and hotel was built for commercial travellers etc. at around the same time. This building is now in private use, as it was converted to flats in the mid-20th century.

The Old Court House

Built in 1849, its construction was financed by the parish council and court treasury, it was principally a magistrate's court (although county court judges sat there) and operated as such, when Magistrates took possession of the building, relocating from the crown hotel, from which they had dispensed justice for centuries. In turn itself closed in October 1992 after which it became a private residence. A local firm of solicitors still trades out of the complex attached to the building which was not part of the original complex.

Next to the courthouse a short road leads to court gardens on the site of the union workhouse. This was designed by William Dunthorne, one of the founders of what became the Royal Institute of British Architects. Adjacent to the gatehouse is the National School, built in 1841 and attended by children in the workhouse. It is now a private residence.

Salamanca House, which is at right angles to the old Court House, was the residence of a prominent local stone mason. A large house that was built opposite it, at the time, was subsequently demolished. A public house is all that remains. A large masonic lodge completes the buildings of that era in that area, but the Masonic Hall was not always such. Records indicate there was a corn hall on the site, as well as a Baptist Chapel, in the late nineteenth century. Substantial private dwellings of the late nineteenth century can still be seen further down London Road.

The Castle Hotel

The Castle hotel, which ceased to trade as an hotel and restaurant, in 2020, is a grade II listed building. It features a distinctive battlemented parapet and is mainly an 18th century building, but the core is probably much earlier. The original guests stayed to enjoy the hunting, shooting, and fishing that were available in the parish. The hotel had its own transport to and from the railway station and then out to the shooting parties that were held on the local estates. The building was originally given permission to be developed into flats. A recent application to turn it into a hostel has been lodged in 2021.

The Crown Hotel

The crown hotel may be found opposite the town hall. Just inside the arched entrance are steps leading to a mounting block for horsemen. Before the courthouse was built magistrates met here. In 1816 it was the scene of riots when the magistrates were besieged by angry starving agriculture labourers, demanding a living wage of two shillings a day and the release of poachers. Two of the rioters, Daniel Harwood, and Thomas Thodi, were hanged at Norwich on the 31st of August 1816.

Conclusion

This has only been a flavour of the history of Downham Market, many other of the developments and personalities that gave Downham Market its rich history may be found by pursuing the records held by the Heritage Society.

Appendix 4: Response Form

Pre-Submission Consultation Response Form Downham Market Neighbourhood Plan



Please return your completed form by 5pm Friday 12th November 2021 to the
Town Clerk, Downham Market Council Office,
15 Paradise Road, Downham Market, Norfolk, PE38 9HS
Or email to

DMNeighbourhoodPlan@downhammarkettc.co.uk

Name:**Address:****Email Address:**

Built Environment Policies		
Policy	Agree with the policy?	Please state clearly and fully any comments or concerns below, if necessary, please attach additional pages. Please state what change(s) would help to resolve your concerns.
1	Yes/ No	Development – great places to live
2	Yes/ No	Distinctive Settlement
3	Yes/ No	Development – to conserve & enhance its setting
4	Yes/ No	Parking & Roads
5	Yes/ No	Home Design
6	Yes/ No	Affordable Homes for Local People
7	Yes/ No	Street Lighting
8	Yes/ No	Traffic Impact
9	Yes/ No	Sustainable Transport

Natural Environment Policies		
Policy	Agree with the policy?	Please state clearly and fully any comments or concerns below, if necessary, please attach additional pages. Please state what change(s) would help to resolve your concerns.
10	Yes/ No	Managing Flood Risk
11	Yes/ No	Biodiversity
12	Yes/ No	Sustainability & Management of Open Space

Local Economy and Tourism		
Policy	Agree with the policy?	Please state clearly and fully any comments or concerns below, if necessary, please attach additional pages. Please state what change(s) would help to resolve your concerns.
13	Yes/ No	Local Jobs & Employment
14	Yes/ No	Retention of Commercial Premises
15	Yes/ No	Tourism

Overall, do you agree with the Downham Market Neighbourhood Plan ?	Yes/ No	In your view are there any omissions from the draft Plan? (Please specify and, if necessary, please attach additional pages)
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Thank you for your comments

Signature:	Date:
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DATA PROTECTION NOTICE: Downham Market Town Council takes your privacy very seriously and processes your personal data with your consent in compliance with data protection legislation. Any personal details you supply will solely be used for the purposes of correspondence relating to the Downham Market Neighbourhood Plan. These details will be shared with the Borough Council of King's Lynn and West, in order to carry out further statutory phases, which will involve your personal details and comments being made publicly available. Downham Market Town Council, as detailed in their retention policy, will retain personal details. Please refer to Borough Council of King's Lynn and West Council's own retention guidelines for how long they will retain your details. If you wish to discuss this any further, please don't hesitate to contact the Town Clerk.

Downham Market Neighbourhood Plan

Downham Market Town Council
Council Office
15 Paradise Road
Downham Market
PE38 9HS

Email: DMNeighbourhoodPlan@downhammarkettc.co.uk

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