

**BIDWELLS**

## Statement of Objection

**Representations Submitted on Behalf of Castle Rising Parish Council, North Wootton Parish Council and South Wootton Parish Council**

**Preferred Options for a Detailed Policies and Sites Plan**

**October 2013**



## **Quality Assurance**

Site name: Land West of Hall Lane, South Wootton & North East of King's Lynn (adjacent Knights Hill)

Type of report: Statement of Objection to the King's Lynn & West Norfolk Borough Council's Preferred Options Consultation for a Detailed Policies and Sites Plan

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Signed

Date 3 October 2013

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Signed

Date 3 October 2013

## Table of Contents

1	EXECUTIVE SUMMARY.....	1
2	INTRODUCTION .....	3
3	COMMENTS/QUERIES ON CONSULTATION DOCUMENT .....	4
4	CONFORMITY WITH LOCAL COMMUNITY ASPIRATIONS .....	6
5	RESPONSE TO CONSULTATION QUESTIONS.....	7
6	SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT .....	16
7	CONCLUSIONS/SUMMARY.....	18

Appendix 1    South Wootton Development Boundary

## **1 EXECUTIVE SUMMARY**

- 1.1 The three adjoining Parishes of Castle Rising, North Wootton and South Wootton continue to strongly object to the scale of the proposed growth allocations on Land West of Hall Lane, South Wootton and North East of King's Lynn for the reasons identified in this report.
- 1.2 Whilst it is acknowledged, albeit not accepted by the three Parishes, that the adopted Core Strategy identifies two key directions for growth within or adjacent to these Parishes, namely:
  - Land West of Hall Lane, South Wootton;
  - North East of King's Lynn, (adjacent Knights Hill)
- 1.3 It is recognised that in response to the Parish Councils' previous objections, the number of dwellings proposed for the preferred site allocations has now been reduced in scale, although it is still not accepted by the Parishes that the proposed scale of growth in these two locations, and the extent of the area affected, is still sufficiently justified and the current policy approach is considered to be unsound.
- 1.4 The three Parishes are protective of the independent identity and character they currently enjoy as villages. However, these proposals suggest an inappropriate scale of development which cannot be accommodated within the existing infrastructure. It also raises the prospect that the separation between each of the villages and the urban area of King's Lynn will be further eroded away, which the Parishes will continue to strongly resist, and is contrary to proposals which previously received Cabinet approval. The Parishes understood that the retention of village status for both North Wootton and South Wootton had previously been agreed by the Borough Council's Cabinet in November 2006 and February 2007, which appears to be ignored by these current proposals.
- 1.5 At this stage, the Parishes contend that the plan preparation process, and its accompanying Sustainability Appraisal (the latest iteration which has not be available for inspection) has, so far, not sufficiently appraised the environmental, social and economic impacts of locating this scale of development adjacent to the existing village(s), nor has the appraisal looked at other reasonable alternative locations where a significant amount of the housing planned for these preferred allocation options can be provided. This work, we believe, would reduce the need for the proposed scale of growth in the sensitive locations adjacent to Castle Rising, North Wootton and South Wootton.
- 1.6 For this reason, further consideration should be given to alternative sites within and immediately surrounding King's Lynn which could take more development to reduce the 'scale' of Greenfield development either planned for, or will impact upon, the Parishes of North Wootton, South Wootton

and Castle Rising. Potential sites, within or adjacent to King's Lynn, which require further consideration and could deliver more development include:

- Nar Ouse Regeneration Area – now that the College of West Anglia and the King's Lynn Academy are not relocating, what will the sites earmarked for these uses be used for?;
  - South East Lynn – the Council has identified that the site could deliver up to 3,000-3,500 dwellings (para 5.2.4 of the consultation document). Currently only 1,600 dwellings are proposed;
  - More opportunity to be made with regards to development in West Lynn and the potential to expand the existing ferry crossing for access to the town centre.
- 1.7 The areas for urban expansion identified in the Core Strategy were predicated on the basis of assurances over the infrastructure requirements being met and the environmental constraints being properly assessed at the allocation stage. Neither of these is evidenced as having been undertaken in the preferred options and hence the assumption that the allocation proposed are consistent with the Core Strategy is not sound.
- 1.8 We trust the contents of this report, along with all representations and evidence previously submitted by the three Parishes in both November 2011 and November 2012, will be given due regard as you continue to prepare the next stages of the Detailed Policies and Sites Plan.

## **2 INTRODUCTION**

- 2.1 This report has been prepared in response to the Borough Council's latest public consultation on its Preferred Options for a Detailed Policies and Sites Plan, referred to hereafter as the consultation document. The contents of this report should be read in conjunction with the representations submitted at the Issues and Options consultation in November 2011, and the technical evidence submitted in respect of Traffic, Flood Risk, Drainage and Landscape in November 2012.
- 2.2 This report has been prepared on behalf of the following who collectively wish to raise their objections to the current consultation document, specifically in respect to the scale of strategic growth which has been identified for these affected parishes:
- Castle Rising Parish Council;
  - North Wootton Parish Council;
  - South Wootton Parish Council;
- 2.3 This report discusses the issues and basis for objection to the scale of development proposed for the two strategic sites located within or are adjacent to the Parishes of Castle Rising, North Wootton and South Wootton:
- Land West of Hall Lane, South Wootton (located within South Wootton Parish, borders with North Wootton Parish) - Proposed allocation of 300 dwellings now proposed under Policy SWOOTTON1 Land North of King's Lynn;
  - North East of King's Lynn (adjacent Knights Hill – located within South Wootton and Castle Rising Parish) – Proposed allocation of 600 dwellings, now proposed under Draft Policy for Knights Hill.

### 3 COMMENTS/QUERIES ON CONSULTATION DOCUMENT

- 3.1 This section is intended to draw the Borough Council's attention to the following parts of the consultation document, principally sections 5.3 South Wootton, 5.4 Knights Hill and 5.5 North Wootton to highlight areas which are either factually incorrect, or are queries/concerns to receive further revision. Please note more detailed comments regarding these sections will be contained within section 5 of this statement in answer to the Borough Council's consultation questions.

Document Ref.	Issue
5.3	<b>South Wootton</b>
5.3.3	South Wootton does not benefit from a doctor's surgery. The closest doctor's surgery is located in North Wootton, and has no capacity for expansion.
5.3.4	South Wootton is defined as one of the strategic 'urban expansion' areas around King's Lynn. Whilst it is acknowledged that this designation is derived from the adopted Core Strategy, the Parish Council's wish to draw the Borough Council to the November 2006 and February 2007 Cabinet Meeting Minutes confirming South Wootton's rural village status (see section 4 of this report for further details).
5.3.6	Reference is made to accommodating 3,470 dwellings as indicated by the Core Strategy between the three sites of Land West of Hall Lane (300), King's Lynn North-East (600) and King's Lynn South-East (1600). Based upon current proposals contained within this consultation document, these three sites only equate to 2,500 dwellings. Therefore where are the other 970 dwellings now proposed by this consultation document?
5.3.15	Amalgamation of two schools onto an expanded site have been an aspiration of the County Council, but have been rejected by parents and was shelved because of financial constraints.
5.3.19	Error – housing will be largely confined to the eastern parts of the area, rather than the western part as stated. For this reason, density is not low. Take off the key infrastructure to achieve 300 dwellings, the net developable area would raise densities beyond the 15 dwellings per hectare, which is anticipated to be representative of the existing village character, when compared with more traditional schemes (excl. Wootton Meadows) around the three Parishes.
<b>Draft Policy SWOOTTON1 Land North of King's Lynn</b>	
I.	Clarification on percentage of affordable housing which will be expected, will it be 15% as a settlement assisting in accommodating the growth of King's Lynn or will it be 20% as a rural village? Notwithstanding the contents of the adopted Core Strategy, further clarification on this needs to be explicit within the site allocation document, including a

Document Ref.	Issue
	precise description of the settlements which are adjacent to the major settlement of King's Lynn. The three Parishes of South Wootton, North Wootton and Castle Rising continue to have their distinctive village identities, which must not be lost at the expense of urban sprawl.
m.	Based upon the Borough Council's assumptions, whilst the calculation of open space is correct, the population estimate, assuming 300 dwellings and 2.33 persons per dwelling, should be <b>699 and not 233</b> as stated in the draft policy.
<b>5.4</b>	<b>Knights Hill</b>
5.4.9	Clarification on the nature of the footpath/cycleway crossing point at Sandy Lane. Will this require a bridge over the A149 to ensure a safe crossing point?
5.4.31	Clarification required on the site area. Para 5.4.31 refers to the site area as 31ha, but the draft policy refers to the site area to be 31.5ha
5.4.40	24 dwellings per hectare across a site of 31.5ha equates to 756 dwellings, not 600 as currently proposed. Require further clarification on the net developable area you are assuming for this site.
5.4.42	Require clarification and consistency in approach. As identified in the adopted Core Strategy, 'allocations will be made in King's Lynn through development at strategic locations' of which South Wootton is one of these such locations. Core Strategy Policy CS09 states that affordable housing levels in King's Lynn will be 15% and 20% elsewhere. Whilst South Wootton is seen for the purposes of allocating growth to be an 'extension to King's Lynn' for the purposes of affordable housing provision, it appears to be considered to be outside of King's Lynn and providing the same as all other rural parts of the Borough. This requires clarification and consistency of approach.

#### **4 CONFORMITY WITH LOCAL COMMUNITY ASPIRATIONS**

- 4.1 The current proposals are in direct conflict with the principles and guidelines of the following Parish Plans:
- Parish Design Statement for the Village of South Wootton, published Autumn 2007;
  - The North Wootton Parish Plan – 'Into the 21<sup>st</sup> Century' published in 2008;
  - Emerging Neighbourhood Plan for South Wootton
- 4.2 The purpose of the above plans were to help shape Parish Council policies and provide guidance to statutory agencies, developers, landowners and businesses and to set the parameters for appropriate development within the Parishes. Most relevant for the proposed allocations is the South Wootton Parish Design Statement, which has been accepted by the Borough Council as a material planning consideration in both planning policy formulation and the determination of planning applications within the area.
- 4.3 In the case of South Wootton, we refer specifically to Section 9 of the document entitled 'Guidelines for Future Development'. The proposals also conflict with the views of the majority of South Wootton residents, supported by the local ward Borough Councillors, who wish to see the special character of these villages retained and not further eroded by the coalescence with the urban area of King's Lynn.
- 4.4 Officers will be aware that South Wootton Parish Council is working hard to prepare a Neighbourhood Plan. We understand a draft will be published for consultation at the end of this year.
- 4.5 As referenced in para 5.3.10 of this consultation document, the Borough Council indicates that the detailed policies of the Neighbourhood Plan once in force will carry greater weight than those of the Borough Council's Local Plan if they are more recent. Therefore, it is imperative that there is general conformity to the two tiers of plan making which are currently emerging. For these reasons, it is important to agree for the benefit and consistency of all plan documents currently emerging, the description of South Wootton and the adjoining settlements of North Wootton and Castle Rising.

## **5      RESPONSE TO CONSULTATION QUESTIONS**

### **Context & Background**

- 5.1 As referenced in para 5.3.6 of the consultation document, the adopted Core Strategy did not assign a specific number of new dwellings. Whilst it is acknowledged through the Borough Council's adoption of the Core Strategy (July 2011) that the principle of locating development to the west of South/North Wootton (West of Hall Lane), and North East of King's Lynn (Knight's Hill) has already been established, the scale of development attributed to these proposed expansion areas adjacent to King's Lynn were certainly not firmly established. This was a topic of some debate during the public examination of the Core Strategy; however, there is no evidence within the adopted Core Strategy, including specific reference to Core Strategy Policies CS03 and CS09, which refers to the scale of growth envisaged for these two areas.
- 5.2 Objections are raised by all three Parishes represented in this document concerning the scale of growth now proposed (300 dwellings West of Hall Lane, South Wootton and 600 dwellings North East of King's Lynn) which is regarded as inappropriate to the character of South Wootton, North Wootton and Castle Rising. This scale of growth would reduce the gap between the development boundaries of North and South Wootton, and the urban area of King's Lynn, whilst also threatening the character and the development boundaries with the adjacent Norfolk Coast AONB.
- 5.3 Whilst it is acknowledged that the scale of development proposed for these allocations has reduced, for the reasons/other material planning considerations previously outlined, and reaffirmed in this report, the three Parishes uphold their objections to the scale of development now proposed by this consultation document.
- 5.4 It is assumed, as part of this consultation, that the appropriateness of the scale of growth is now being tested for each of the strategic locations, through public consultation. This will also need to involve consideration of reasonable alternative site options, including re-distributing the scale of allocations across the Borough (where this would not jeopardise the strategic parameters already identified through the adopted Core Strategy), informed by the Sustainability Appraisal (SA) process.
- 5.5 It is, therefore, our contention that if the Borough Council, through the SA process, (which was not available to view as part of this consultation) assesses alternative site options, the scale/extent of development allocations West of Hall Lane, South Wootton and North East of King's Lynn can be reduced to a scale more reasonable and appropriate for the size of these villages and the environmental constraints. Housing released from these proposed developments can be redistributed to other locations more closely located and associated to the urban area of King's

Lynn where capacity exists for larger numbers than have been allocated in the plan, i.e. South East King's Lynn where, according to para 5.2.3 and 5.2.4 of the consultation document, this area for growth is "relatively unconstrained by flood risk and infrastructure problems, and relatively easily accessed and serviced". Para 5.2.4 of the consultation document goes on to indicate, informed by the work of the Prince's Foundation for the Built Environment in connection with the Neighbourhood Plan for the area, a total of 3,000 to 3,500 additional dwellings could be accommodated within this strategic location. This evidence would suggest that capacity exists in this location to achieve sustainable and deliverable development which is unconstrained by environmental constraints. Therefore the Parishes would question why less than 50% of its capacity is proposed for allocation within this consultation document, whilst seeking to allocate development in other (more sensitive) areas adjoining King's Lynn where the harm will be significantly more adverse.

### **Questions: South Wootton**

#### **Do you have any comments on the proposed development boundary?**

- 5.6 The Parish Council does not consider that the proposed development boundary is accurately drawn to reflect what is evident on the ground. The proposed development boundary currently excludes the school playing fields, The Meadows, Creakside, Ryalia Drift, No. 79-93 Nursery Lane and the extension to the Parish Cemetery. To provide clarity on what is considered by South Wootton Parish Council to be the correct development boundary for the settlement, we enclose an annotated plan highlighting the errors and corrections required. (see **Appendix 1**).

#### **Do you have any comments on the draft allocation SWOOTTON1?**

- 5.7 The Parish Councils acknowledge that the draft allocation SWOOTTON1 Land North of King's Lynn has been reduced from 800 to 300 dwellings, which is welcomed, and more appropriately addresses the constraints with regards to the local highway network. However, when considered in combination with the proposed allocation at Knights Hill, cumulatively the two sites now propose 900 dwellings. Based upon a new resident population of 2,097, assuming 2.33 persons per dwelling, this equates to a 49% increase in the Parish population of 4,247 as taken from the 2011 Census. This is an increase which the Parishes consider to be inappropriate for the identity and character of the existing settlements, which the Parish Councils will continue to resist the village character from being eroded by urban sprawl.
- 5.8 The site area, as currently indicated, is approximately 40 hectares, with over half of the proposed allocation being exposed to medium-high risk of flooding from tidal and defence breaches. From

the Parish Councils' own Flood Risk Appraisal, undertaken and submitted to the Borough Council in November 2012, the following was concluded:

- 5.9 The available development area is calculated as follows:

Available development area within Flood Zone 1	19.4ha
Land take associated with attenuation ponds & other SUDs features	1.75ha
Land take associated with ditches at site boundary	0.4ha
Development area	17.25ha

- 5.10 Assuming an appropriate deduction for associated road infrastructure and strategic open space, it is conceivable that the net developable area of this site should be more realistically in the region of 15ha. Assuming an average site density of 15 dwellings per hectare (dph), which the Parishes would consider is an appropriate density, comparative to the majority of development within the South Wootton Parish, this would equate to **a reduction in the total number of dwellings proposed by the SWOOTTON1 allocation.**
- 5.11 Whilst it is credible that the Borough Council proposals are to utilise 20ha of land within the allocation for open space and strategic landscaping, this in itself would not be conducive of a well-designed development, by concentrating all the residential development within a constrained area due to flood risk, and to then disperse the open space across the remainder. It is the view of the Parish Councils, that based upon the figures and due to the severity of the flood risk constraint identified above, that the proposed site allocation is reduced. The site area should also be reduced from 40ha to an area which delivers a net residential developable area of circa 15ha, at an average density of 15dph., with a more appropriate scale of landscaping buffer provided to minimise the extent of agricultural land which is taken out of production.
- 5.12 For the reasons provided above, the Parish Councils consider Draft Policy SWOOTTON1 Land North of King's Lynn to be currently unsound as it lacks sufficient justification and is not supported by a credible evidence base.
- 5.13 The policy, as currently drafted, would indicate that a number of constraints are not being sufficiently investigated prior to allocation of the site. Deferring consideration of these environmental constraints, including flood risk, landscape, arboriculture, ecology and archaeology until planning applications are submitted does, in our view, indicate an unsound approach to plan making, potentially threatens the legal robustness of the SA/SEA processes and could easily

render the site undeliverable, and seriously jeopardise the delivery of the Borough's planned housing targets in the longer term.

5.14 Other specific concerns/questions with regards draft policy SWOOTTON1:

Policy Ref	Representation
2f	Request further clarification on what this direct/indirect link means in practice.
2i	Is this suggesting that the existing school off Hall Lane will be accessed by any new development infrastructure and not from its existing Hall Lane access?
2j	If a new doctor's surgery is not provided within the site (essential infrastructure should be outside the flood zones), then what sites within South Wootton does the Borough Council anticipate considering for this use?
2n	What utility work has been undertaken to establish the likely reinforcement/diversionary costs of utility infrastructure. When considered alongside other site constraints, does this affect the viability/deliverability of the site allocation?
2o	The Draft Habitats Regulations Assessment does not consider in sufficient detail the impact upon both Dersingham Bog and Roydon Common as a result of increased recreational pressure. This pressure is particularly in relation to the increased impact dog walkers could have upon nutrient levels at these protected sites, which we understand is reaching critical levels and could start to adversely affect the integrity of these sites.  SWOOTTON1 is one of the closest preferred allocations to both Roydon Common and Dersingham Bog. Therefore, the opportunity is increased for these direct/indirect impacts to arise from the proposed allocation in this location upon these protected sites. In our view, this raises doubt regarding whether the scale of growth currently proposed by SWOOTTON1 is currently justified and based upon credible and robust evidence. .

**Is there a more suitable site (or sites) to accommodate around 300 dwellings in South Wootton than the Council's preferred site(s)? Why is this site (or sites) more suitable?**

- 5.15 The Parish Council would not wish to suggest any further alternative sites.
- 5.16 Notwithstanding this, it is our contention that if the Borough Council, through the SA process, assesses alternative site options, the scale/extent of the development allocation proposed by draft policy SWOOTTON1 can be reduced to a scale more reasonable and appropriate for the size of the village and its environmental constraints. Housing released from these proposed developments can then be redistributed to other locations more closely located and associated to the urban area

of King's Lynn, where capacity exists for larger numbers than have been allocated in this emerging plan, i.e. South East King's Lynn.

- 5.17 According to para 5.2.3 and 5.2.4 of the consultation document, this area for growth is "relatively unconstrained by flood risk and infrastructure problems, and relatively easily accessed and serviced". Para 5.2.4 goes on to indicate that, informed by the work of the Prince's Foundation for the Built Environment in connection with the Neighbourhood Plan for the area, a total of 3,000 to 3,500 additional dwellings could be accommodated. This evidence would suggest that capacity exists in this location to achieve sustainable and deliverable development which is unconstrained by environmental constraints. We would, therefore, question why less than 50% of its capacity is proposed for allocation, whilst seeking to allocate development in other more sensitive areas adjoining King's Lynn where the harm will be significantly more adverse.
- 5.18 With regards to the alternative options considered, the Parish Councils contend that it is incorrect to suggest that developing a smaller number of dwellings in the South Wootton area would be inconsistent with the adopted Core Strategy. Whilst it is acknowledged that the Core Strategy identified this area for strategic growth, no scale was specified. Therefore, reducing the size of the allocation at SWOOTTON1 would not be contrary to the Core Strategy and whilst greater numbers of housing would need to be provided at the other strategic growth locations around King's Lynn. It has already been identified that South East King's Lynn has capacity to accommodate more than double the amount currently proposed for allocation.

### **Questions: Knights Hill**

#### **Do you have any comments on the proposed development boundary?**

- 5.19 Notwithstanding the in principle objection of the Parish Councils to the proposed allocation at Knights Hill, we also consider the allocation proposed to be too extensive and does not reflect the sensitive characteristics of its location.
- 5.20 The proposed allocation is too extensive and proposes land that has a significant landscape and visual impact over a wide area, by compromising and breaking the ridgeline that rises to the east and north. It proposes development on top of the ridge at Knights Hill which would have dramatic impact on local views, the appreciation of landscape quality and historic setting. This is one of the few areas of higher ground that is a key component of the historic character of the area and which is important in the setting of Castle Rising and the listed buildings at Knights Hill itself. It is part of the areas identity. The proposed allocation should also be set back from the Grimston Road and Queen Elizabeth Way in order to help maintain the rural appearance of the area, prevent the

impression of urban sprawl and help ensure that any development within the proposed allocation provides appropriate levels of green space.

**Do you have any comments on the draft allocation KNIGHTSHILL?**

- 5.21 Notwithstanding our objection in principle and, whilst it is acknowledged that the Borough Council has now reduced the proposed allocation from 750 to 600 units in response to local and statutory consultee concerns, the Parish Councils still contend that the scale of development proposed is too large when compared to the cumulative and in-combination effects with draft policy and allocation SWOOTTON1. Therefore, the scale of development at Knights Hill should be reduced and the alternative options should be explored within the vicinity of King's Lynn (as noted previously) and the other settlements in the subsequent tiers of the settlement hierarchy, where environmental/infrastructure capacity exists to accommodate more significant development. This approach is entirely consistent with the Core Strategy.
- 5.22 With reference to the technical transport appraisal work provided to the Borough Council in November 2012, this evidence concludes that both the SWOOTTON1 and KNIGHTSHILL allocations should be reduced by half to ensure that the level of growth proposed can be accommodated within the capacity of the existing constraints of the local highway network, including any increased capacity from improvements to adequately mitigate the impacts of the proposed growth. This is the minimum change necessary and we note that there is no evidence base from the Highway Authority or Borough Council to suggest that the level of traffic from the cumulative development within these areas can be accommodated within the existing network. We note with great concern the existing high levels of peak hour and non-peak traffic congestion on Grimston Road and Queen Elizabeth Way and their poor accident record, and we therefore would strongly suggest that these issues are considered further and evidenced as part of this plan process, as without, this development will not be accommodated on the local road network.
- 5.23 Whilst it is acknowledged that the Hall Lane site allocation has been reduced by over 50%, in order to achieve a net reduction of at least 50% across the two allocation areas, the Parishes contend that the Knights Hill allocation should be reduced further and justified in the context of other environmental constraints identified. This will also assist in minimising some of the environmental and nature conservation impacts identified in the previous consultation. It does not, however, in itself deal with these issues entirely and they should clearly also be subject to detailed assessment at the proposed allocation stage as part of this plan process in order to meet the requirements of the NPPF and SA/SEA.
- 5.24 This transport information has been provided to the Local Highway Authority who, whilst reviewing its contents, has not to date provided any counter evidence. Through subsequent discussions with

representatives of the Local Highway Authority, it is assumed that this detail will be known at the application stage when the transport assessments are prepared. Without credible and robust evidence to justify the delivery of this proposed allocation and acceptability of the impacts for the purposes of the SEA process, it is our view that it remains unsound to avoid these issues and defer until the planning application stage.

- 5.25 This reduction is, in our view and other consultees, driven by the need to reflect the environmental constraints of the site. Whilst we acknowledge that the reduction in numbers from 750 to 600 dwellings has been fuelled by the need to provide a buffer to protect the area of Ancient Woodland at Reffley Wood (Para 5.4.7 of the consultation document), we would request further review of this proposed allocation boundary is undertaken to reflect the Parish Councils previous objections and those received to date from both the Norfolk Wildlife Trust and Woodland Trust. We understand that both these consultees have raised concerns relating to the buffer zone (200m) required around the existing woodland, as well as the effect increased recreational pressures could be from this development, both directly and indirectly upon Roydon Common SAC and Dersingham Bog SPA which are close to this allocation area.
- 5.26 It is the view of the Parish Councils, that the HRA, which accompanies this consultation document, does not adequately address the potential for increased nutrient enrichment of both Dersingham Bog and Roydon Common from increased dog walking, or from the other impacts identified, associated with an increased resident population from this proposed allocation.
- 5.27 This aspect could lead to a cumulative adverse impact upon the integrity of these designated sites, which could impact upon whether this development allocation is capable of being delivered.
- 5.28 Added to this is the issue raised by Norfolk County Council in respect to whether there is potential for silica sand deposits to exist within this area. Given the proximity of the existing silica sand extraction at Leziate, further investigation is required to ascertain whether any silica sand resource is available. Given the national significance and policy position for silica sand in the UK, this matter needs addressing before progressing this allocation further. If silica sand reserves are present, then extraction will be required before any development can be consented/commenced, which could severely question the delivery of this allocation during this plan period.
- 5.29 Overall, we contend that the site options have been put forward without any proper assessment or evaluation of the flora and fauna, which would be affected by the development allocations which, as previously highlighted, the potential effects upon ecological assets could be so significant as to be contrary to the Borough Council's objectives for biodiversity within their Sustainability Appraisal Framework.

- 5.30 The proposed allocation is bounded by the AONB along the A148 to the north east of Knights Hill and adjoining the settlement along Grimston Road. Given the topography of the site rising to the top of Knights Hill, this will result in prominent development that dominates the adjoining area and being visually prominent in sensitive viewpoints. These include significant views into and out of the AONB resulting in an urbanised environment and an impression of urban sprawl further encroaching onto the nationally important landscape of the AONB. This also has a potentially significant impact on the setting of the listed buildings at Knights Hill and its relationship and setting of Castle Rising itself. The combined effect on three nationally important features is significant and must be adequately addressed in any proposed allocation. At present neither the extent of the allocation nor the proposed phasing plan pay any regard to these important heritage and landscape assets.
- 5.31 In view of the above, the Parish Councils consider that in order to have sufficient regard to the Local, National and European environmental constraints/sensitivities identified, whilst the implications of these need to be fully evaluated prior to allocation, the boundary of the proposed allocation should be restricted to acknowledge the sensitivities of the immediate environment.
- Is there a more suitable site (or sites) to accommodate around 600 dwellings at Knights Hill South Wootton than the Council's preferred site(s). Why is this site (or sites) more suitable?**
- 5.32 The Parish Councils would not wish to suggest any further alternative sites within this area for the scale of development proposed, given the environmental sensitivities identified within this report and previous representations.
- 5.33 Subject to our 'in principle' concerns, the Borough Council should through the Plan and SA/SEA process assess alternative options and should reduce significantly the proposed allocation at Knights Hill to a level more consistent with its sensitive environment and key national constraints. Housing released from these proposed developments can be redistributed to other locations more closely located and associated to the urban area of King's Lynn where capacity exists for larger numbers than have been allocated in the plan, i.e. South East King's Lynn. According to para 5.2.3 and 5.2.4 of the consultation document, this area for growth is "*relatively unconstrained by flood risk and infrastructure problems, and relatively easily accessed and serviced*". Para 5.2.4 goes on to indicate that, informed by the work of the Prince's Foundation for the Built Environment in connection with the Neighbourhood Plan for the area, a total of 3,000 to 3,500 additional dwellings could be accommodated. This evidence would suggest that capacity exists in this location to achieve sustainable and deliverable development which is unconstrained by environmental constraints. We would, therefore, question why less than 50% of this area's capacity is proposed

for allocation, whilst seeking to allocate significant development in other areas adjoining King's Lynn where the environmental sensitivity/harm will be significantly more adverse.

- 5.34 With regards to the alternative site options considered, the Parish Councils contend that it is incorrect to suggest that developing a smaller number of dwellings in the 'South Wootton Area' would be inconsistent with the adopted Core Strategy. Whilst it is acknowledged that the Core Strategy identified this area for strategic growth, no scale was specified. Therefore, reducing the size of the allocation proposed by draft policy KNIGHTSHILL would not be contrary to the Core Strategy. Whilst greater numbers of housing would need to be provided at the other strategic growth locations around King's Lynn, it has already been identified through the Borough Council's consultation document that South East King's Lynn (West Winch/North Runton), we understand, has unconstrained capacity to accommodate more than double the amount currently allocated in this location, which would more than accommodate for the redistribution of some of the growth envisaged by draft policy KNIGHTSHILL.

#### **Questions: North Wootton**

- 5.35 In answer to the questions provided on page 151 of your consultation document, we would respond as follows, submitted specifically on behalf of North Wootton Parish Council
- 5.36 We would contend that no further sites should be identified in North Wootton, and the two current strategic allocations proposed at Hall Lane and Knights Hill should be considered, subject to agreeing an appropriate scale of growth with the Parish Councils, the full extent of the allocation for the three Parishes of Castle Rising, South Wootton and North Wootton for this plan period.

## 6 SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT

- 6.1 The Strategic Environmental Assessment (SEA) Directive requires the assessment to identify, describe and evaluate '*the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives*'.
- 6.2 In the absence of a Sustainability Appraisal (incorporating the requirements of the SEA Directive), we are unable at this stage to fully evaluate the evidence base supporting the Borough Council's preferred options document. Therefore, our clients reserve the right to respond further once the Sustainability Appraisal is made available for consultation. At this stage, we consider the consultation document lacks a vital piece of evidence and, therefore, conclude that the consultation has not currently been undertaken based upon a robust and credible evidence base.
- 6.3 Notwithstanding the above, the Sustainability Appraisal for the Core Strategy, whilst evaluating the effects arising from Policy CS09, did not test any alternative scales of growth for King's Lynn and the adjacent settlements. Certainly, it is our contention that we can not see any evidence from previous iterations of the SA process, that the scale of development proposed for the Woottons has been sufficiently tested and evaluated through the Sustainability Appraisal process, nor does the appraisal consider reduced growth scenarios as a potential locational option. Unless this is resolved through further stages of the SA/SEA process, this continues to be a fundamental ground on which it may be possible to challenge the soundness of the emerging planning policy document.

### Cumulative Impacts

- 6.4 The adopted Core Strategy has identified (page 99) general directions of growth west of the Woottons and Land North East of King's Lynn as 'areas for urban expansion' on the Key Diagram for King's Lynn. These general directions for growth would contribute to the overall growth envisaged for King's Lynn. However, there was no appraisal or suggestion within Policy CS09 (with the exception of South East Lynn) of the growth envisaged at each location.
- 6.5 It is our contention that there has been no testing of reasonable alternative sites within these general strategic directions, nor have alternative site options been evaluated through the Sustainability Appraisal process to determine whether the scale of growth envisaged, in combination with each other, would give rise to significant cumulative environmental, economic and social effects.

- 6.6 In the absence of any up to date SA/SEA evidence base to support the policy approach taken in this consultation document, it is not possible to determine whether these concerns have been robustly resolved.

## 7 CONCLUSIONS/SUMMARY

- 7.1 The Parishes of Castle Rising, North Wootton and South Wootton object to the scale of development proposed for allocation by draft policies SWOOTTON1 and KNIGHTSHILL on the basis of the environmental sensitivities and constraints identified, both within this report and previous representations submitted during the issues and options consultation of this plan making process.
- 7.2 Based upon technical evidence, the Parish Councils consider the scale of growth proposed by draft policy **SWOOTTON 1 should be reduced from 300 dwellings**, covering half the proposed allocation site. The growth proposed by **draft policy KNIGHTSHILL should also be reduced from 600 dwellings**, to a scale which better reflects the local village character and the area's sensitive environmental and key national constraints.
- 7.3 The Parish Councils suggest that dwellings not allocated in the above locations should be redistributed to alternative site locations adjacent to King's Lynn where it is identified that the environmental, physical and infrastructure constraints are not so severe. In the case of South East King's Lynn (West Winch/North Runcton), the Borough Council's consultation document suggests that this location can accommodate at least double the amount of growth currently allocated by this draft plan. For this reason, further consideration of alternative site options/distribution of growth options need to be appraised through the Sustainability Appraisal/Strategic Environmental Assessment processes.

**Representation Submitted on Behalf of Castle Rising Parish Council,  
North Wootton Parish Council & South Wootton Parish Council  
Preferred Options Consultation for a Detailed Policies and Sites Plan  
October 2013**

**BIDWELLS**

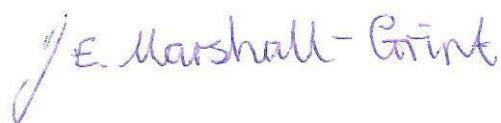
**Mr David Goddard, Deputy Chairman of Castle Rising Parish Council**

Signed



Date

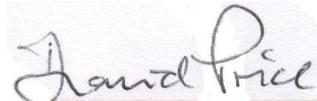
Signed



Date                    3 October 2013

**Mr David Price, Chairman of South Wootton Parish Council**

Signed



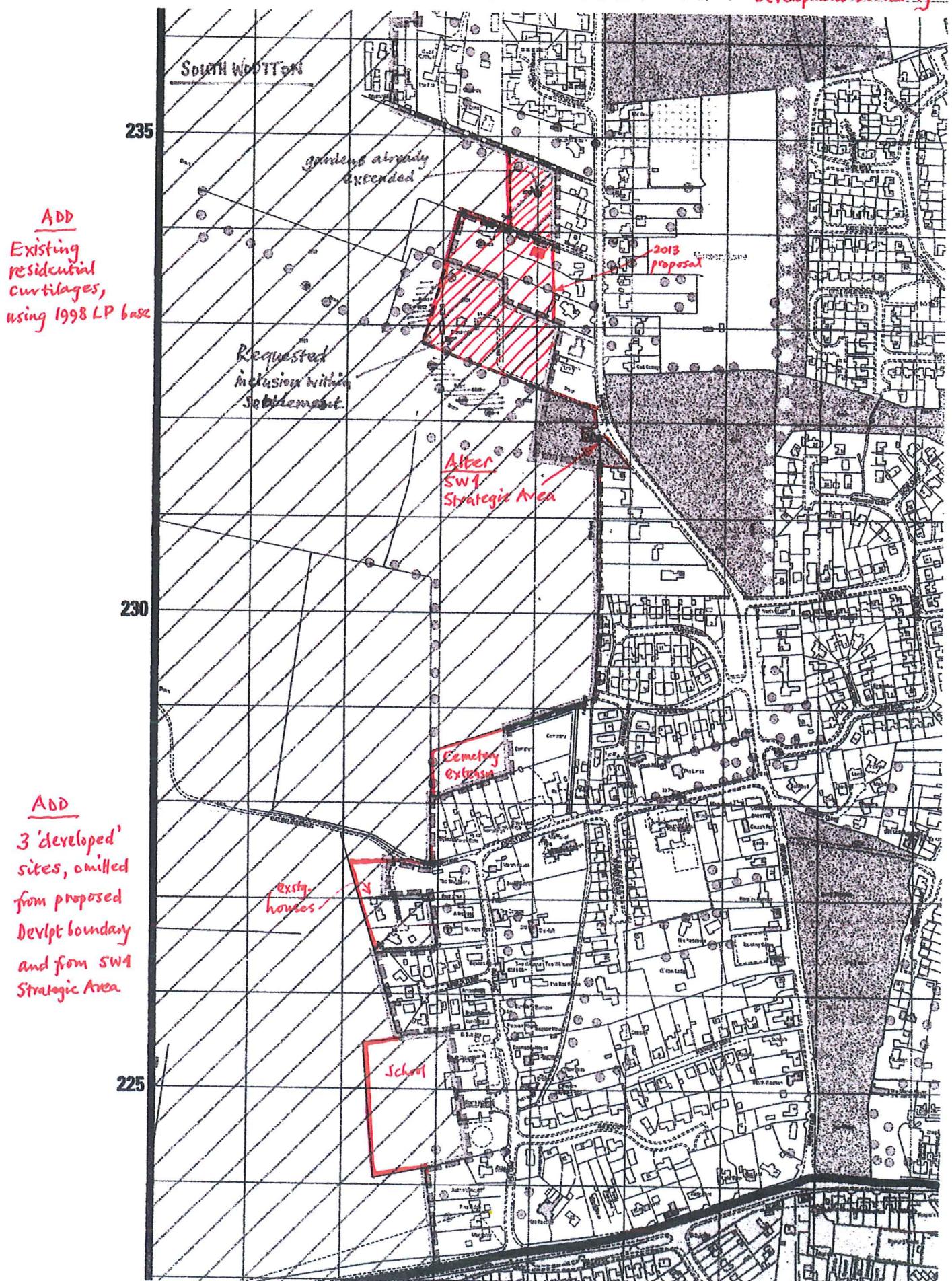
Date                    3 October 2013

**BIDWELLS**

# Appendix 1

**South Wootton Development Boundary**

**DETAILED POLICIES & SITES**  
Consultation July 2013 – SOUTH WOOTTON  
Development boundary



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