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**BIDWELLS**

For the attention of Mr Alan Gomm  
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Dear Mr Gomm

**Email and post**

### **Representations to the Draft Sustainability Appraisal Report (Revision 1\*) for the Detailed Policies and Sites Plan Preferred Options**

The following representations have been prepared and submitted on behalf of South Wootton Parish Council in response to the Draft Sustainability Appraisal (SA) Report for the Borough Council's Detailed Policies and Sites Plan Preferred Options Document.

These representations should be read in conjunction with the statement of objection, prepared and submitted in October 2013, along with all representations and evidence previously submitted on behalf of the Parish Council in both November 2011 and November 2012.

South Wootton Parish Council continues to strongly object to the scale of the growth allocations proposed for Land West of Hall Lane, South Wootton (SWOOTTON1) and North East of King's Lynn (KNIGHTSHILL).

The proposals contained within the consultation document, and evaluated by the SA process, the Parish Council consider to be an inappropriate scale of development, which cannot be accommodated within the existing infrastructure. At this stage, the Parish Council contend that the plan preparation process, and its accompanying Sustainability Appraisal, of which these representations respond, does not, so far, sufficiently appraise the environmental, economic and social effects of locating this scale of development adjacent to the existing village, nor has the appraisal looked at other reasonable alternative locations where a significant amount of the housing planned for these preferred allocation options could be provided. This work, we believe, would reduce the need for the proposed scale of growth in the sensitive locations adjacent to South Wootton Parish.

### **SA Methodology & Approach**

The Parish Council requests further explanation of how the Site Sustainability Factors have been established, alongside the robustness of the potential links to the Local Plan Sustainability Objectives.

In addition, the site sustainability factor scoring guide, provided in Table 3.4c of the Council's document, appears incomplete. There is not an interpretation of the score for each sustainability impact score under every site sustainability factor. This consequently makes it difficult to challenge a potential re-score, as it is difficult to determine the Borough Council's interpretations.

The scoring system utilised appears to be arbitrary and subjective in how the sustainability impact score is arrived at, i.e. whether it is positive/negative, and the severity of the score. For these reasons, the Parish Council would draw the Borough Council's attention to the following aspects.

All changes proposed in the following representations utilise the same scoring criteria used by the Borough Council.

### **Knights Hill**

As denoted by the SA documentation, no alternative site locations have been evaluated at this location, therefore, all the following references relate to the proposed allocation for North East King's Lynn (Knights Hill).

### **Community & Social**

The Borough Council's positive score would indicate, with reference to table 3.4c, page 28 of the consultation document, that there is 'overall favourable community support to the proposals'. Certainly from the statement of objection, prepared on behalf of the Parish Council, and after reviewing other comments received from local residents to date, we would contend that this certainly is not the case. Whilst it is acknowledged that further housing could benefit the wider community, the existing Parish would be negatively affected by the proposals, including the potential damaging effects upon community asset. The Parish Council, therefore, questions the community benefit for the Parish to arise from the proposed development.

### **Heritage**

The proposed allocation is bounded by the Norfolk Coast AONB, along the A148 to the north east of Knights Hill, and adjoining the settlement along Grimston Road. Given the topography of the site, which rises 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. The combined effect on these 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. Therefore, the Parish Council contends that the scoring should be revised from 'neutral 0' to 'dependent on implementation/negative #/x') until further evidence is provided relating to these concerns, which are of a strategic nature.

### **Highways and Transport**

It is noted that the scoring criteria used under the evaluation of this site sustainability factor is solely based upon the view of the Local Highway Authority. Notwithstanding this, and with reference to the technical Transport Appraisal work provided to the Borough Council in November 2012, this evidence concludes that the 'KNIGHTSHILL' allocation should be reduced by half to ensure that the level of growth proposed can be accommodated within the scope of the existing constraints of the local highway network, allowing for deliverable improvements to adequately mitigate the impacts of the proposed growth.

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 by Officers 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/SA process, it is our view that it remains unsound to avoid these issues and defer until the planning application stage. In view of this, the Parish Council contends that the positive score should, at the very least, be reduced to 'positive/negative' as the actual impact has not yet been proven with robust and credible evidence.

### **Landscape and Amenity**

The highest ground lies in the area known as 'Knights' Hill' and reaches just over 50 metres AoD. Here, the upland becomes a quite prominent plateau and, as such, a very important landscape feature. The plateau overlooks both river valleys, the developed areas of Gaywood and King's Lynn, the Woottons, Castle Rising and the lowland mire of Roydon Common. To the west, the Wash can be viewed while, several kilometres to the east, the vista extends via the villages of Congham, Grimston and Gayton, to the chalk escarpment and beyond.

Knights Hill plateau also extends eastwards into the parish of Hillington. Along it runs an important and ancient road, now the A148. This route ran from Lynn crossing the Gaywood River at 'Bishop's Bridge' (mentioned in a late 15<sup>th</sup> century survey of the lands of the Bishop of Norwich in Gaywood). Both the Wootton and Grimston Roads form part of this route, once known as 'Walsingham Waye'.

The Norfolk Coast AONB also adjoins this area. As a nationally important landscape feature, it will be adversely impacted upon by the setting of new development in this location. This includes 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. The combined effect is significant and must be adequately addressed in any proposed allocation. At present, the extent of neither the allocation nor the proposed phasing plan, pays any regard to these important landscape assets. For these reasons, the Parish Council contends that the score should be revised to Negative, until there is robust/credible evidence available which suggests otherwise.

### **Natural Environment**

It is the view of the Parish Council that the Habitat Regulations Assessment (HRA), which accompanied the previous 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.

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.

Added to this is the issue previously 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.

From our review of the evidence provided to support the promotion of this proposed allocation, overall, we contend that the site option has been put forward without sufficient assessment or evaluation of the flora and fauna, which would be affected by the development allocation, both locally and also in combination with the adjacent AONB and adjacent area of Ancient Woodland at Reffley Wood. Both these assets warrant further review, as they are afforded significant protection under the NPPF. Whilst it is acknowledged that the reduction in numbers at this allocation has been largely driven by ecological concerns, we would request further review of this proposed allocation boundary is undertaken to reflect the Parish Council's previous objections and those received to date from both the Norfolk Wildlife Trust and Woodland Trust. 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.

Therefore, in the absence of current robust and credible evidence, the Parish Council contends that the score should be revised to 'negative'. The negative impact on such indicators cannot be left to how the scheme is implemented, as these effects go beyond the site and cannot be mitigated just through good design. For this reason, and to ensure that the delivery of this allocation will result in a form of sustainable development, further work is required to provide evidence related to heritage, Highways, Landscape, and the natural environment (inc ecology) before improved scoring can be provided.

**Parish Council Revised Scoring for Proposed Knights Hill Allocation (Highlighted cells show variance in scores)**

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Env	Infrastructure, Pollution & Waste
Borough Council's Scoring	+	+	0	0	+	0	+	#	#	#
SWPC Scoring	+	X	0	0	+	#/x	?/x	X	X	?

**Land at Hall Lane, South Wootton (SWOOTTON1)**

The following comments relate to the evaluation of the Council's preferred option SWOOTTON1, as related to the Parish Council's objections against this preferred allocation to date. The Parish Council do not wish to make any further comments in respect to the alternative site options, only insofar as the following comments.

**Sites 446/817 & 818**

It is noted that the overriding reason for rejection of the above sites is that it constitutes development within the AONB, of which *'benefits from the highest degree of landscape protection under the NPPF and a presumption against major development'*. The Parish Council would suggest a similar rationale should be afforded in the case of the proposed Knights Hill allocation, given its elevated sensitive plateau location, adjacent to the AONB and ancient woodland, both of which will be adversely affected by the development of the growth envisaged in this location.

**Site 1152**

Reference is made to the site being *'insufficient size by itself to accommodate the scale of housing growth sought by the Core Strategy'*. The Parish Council wishes to re-iterate previous comments made throughout this process, that the Core Strategy, whilst identified a strategic direction for growth in the Woottons, and an overall figure of how many dwellings needed to be accommodated within each tier of the settlement hierarchy, did not propose specific sites or, indeed, did not identify specific numbers of dwellings to each settlement. Therefore, the Parish Council contends that this statement is factually and technically incorrect.

### **Economy A Business**

The Borough Council's scoring, under this site sustainability factor, would, by its own scoring guide, suggest that the overall contribution to the economy, jobs and business opportunity is positive from this development. The Parish Council would contend that the allocation at SWOOTTON1, as proposed, would deliver minimal/no real benefit to the long term status of the local economy, and therefore should be revised in its scoring to 'Neutral'.

### **Heritage**

The Borough Council's scoring, under this site sustainability factor, would, by its own scoring guide, indicate that the impact from the proposed allocation upon Heritage assets is currently unknown. The Parish Council contends that, based upon the representations submitted in November 2011, which included some archaeological evidence, the scoring should be reduced to negative. According to archaeological investigations of the area in the late 1960s, there is evidence which indicates that a 16th Century Fort/Sconce has been identified west of Hall Lane, which will require further geophysical surveys and potential trial trenching before the full significance of this site can be determined. For these reasons, there would be some minor degradation of heritage.

### **Highways & Transport**

It is acknowledged that the Borough Council's scoring for this aspect suggests that 'the allocation will deliver better transport links for the community' and whilst in part, the Parish Council agrees that the development allocation would enable an alternative access route to be delivered eliminating the need to access the existing school facilities from Hall Lane. Notwithstanding this, the Parish Council contends that insufficient evidence has been provided by the Local Highway Authority to indicate that the proposed scale of growth envisaged at SWOOTTON1 is sustainable in terms of highways and transport, adequately demonstrating that the highway network and the confines of what additional capacity can be created, is adequate to mitigate the impacts of the proposed development.

### **Natural Environment**

From evidence provided by local residents, confirmed by the Norfolk Bird Atlas and submitted to the Borough Council in November 2011, the proposed site (ref TF629) contains forty breeding species and thirty two wintering species (some being endangered). Before further consideration of this site option is given through the preparation of the Site Allocations and Policies DPD process, a more detailed examination is required to determine the significance of ecological assets in the vicinity and whether these will be adversely affected by the proposed development. If this is found to be the case, this additional information should inform the Borough Council's Sustainability Appraisal and Appropriate Assessment processes. In the absence of this evidence, the Parish Council contends that a precautionary approach should be taken and rather than being considered uncertain, based upon the limited information which is available, the impact should be considered negative until further ecological information is available.

**Parish Council Revised Scoring for Proposed SWOOTTON1 Allocation (Highlighted cells show variance in scores)**

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Env	Infrastructure, Pollution & Waste
Borough Council's Scoring	+	+/x	+	X	+/x	?	++	+/x	?	0
SWPC Scoring	+	+/x	0	x	+/x	X	+/-	+/x	X	0

**Conclusions**

The Parish Council does not contend that the Sustainability Appraisal, undertaken by the Borough Council, enables the Local Planning Authority, or its consultees, to arrive at the conclusion that the Site Specific policies, as currently drafted, will not have an overall positive effect on the environment.

The SA, as currently drafted, fails insofar as it does not consider the cumulative, in-combination environmental effects of the overall sustainability of the preferred development allocations. For example, what are the in-combination direct and indirect environmental effects to arise from the preferred allocation of Land North East of King's Lynn in combination with the allocation at SWOOTTON1? Cumulatively, these two proposed allocations will, at this stage, propose 900 dwellings and associated infrastructure, but the SA does not evaluate the sustainability of the two areas in combination and whether these will exceed environmental, economic or social capacity to justify the sustainability of the development proposed.

For the reasons identified in these and other representations submitted on behalf of the Parish Council, the Parish Council contends that the preferred options, as currently envisaged for Land West of Hall Lane and North East King's Lynn, remain inappropriate in scale and would not lead to a sustainable form of development, nor provide the overall positive effect on the environment, as envisaged by the requirements of the Directive.

We trust that the above representations will be considered by the Borough Council in the next iteration of the Sustainability Appraisal and that these representations will be read in conjunction with previous representations submitted in connection with the site allocations document on behalf of the Parish Council.

Yours sincerely

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