

Statement of Objection

Representations Submitted on Behalf of South Wootton Parish Council
Preferred Options for a Detailed Policies and Sites Plan
October 2013



**Representations Submitted on Behalf of
South Wootton Parish Council**

Preferred Options Consultation for a Detailed Policies and Sites Plan
October 2013

BIDWELLS

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

Prepared by: James Alflatt BA(Hons) DipTP MSc MRTPI AIEMA



Signed:

Date 3 October 2013

Reviewed by: Paul Clarke DipEP MRTPI



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	DESCRIPTION OF SOUTH WOOTTON	7
6	RESPONSE TO CONSULTATION QUESTIONS	9
7	DRAFT POLICY SWOOTTON1	17
8	DRAFT POLICY FOR KNIGHTSHILL	20
9	SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT	23
10	CONCLUSIONS/SUMMARY	24

Appendix 1 South Wootton Development Boundary

1 EXECUTIVE SUMMARY

- 1.1 South Wootton Parish Council continues to strongly object to the scale of the proposed growth allocations for Land West of Hall Lane, South Wootton and North East of King's Lynn for the reasons identified in this report, and those collectively made by the three parishes of South Wootton, North Wootton and Castle Rising by separate representation.
- 1.2 It is acknowledged, albeit not accepted by the Parish Council, that the adopted Core Strategy identifies two key directions for growth within or adjacent to this Parish, 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 Council's previous objections, the number of dwellings proposed for the preferred site allocations have now been reduced in scale, although it is still not accepted by the Parish that the proposed scale of growth in these two locations, and the extent of the area affected, is still sufficiently justified and, for this reason, the current policy approach is considered to be unsound.
- 1.4 South Wootton Parish Council is protective of the independent identity and character they currently enjoy as a village, and are currently working hard in the preparation of a neighbourhood plan. The purpose of the plan is to help guide any new development in a manner which is both sustainable and respects the character of this rural village settlement, to help minimise the effect urban sprawl from the nearby local growth centre of King's Lynn could have upon the Parish of South Wootton.
- 1.5 The proposals contained within the consultation document, the Parish Council consider to be an inappropriate scale of development which cannot be accommodated within the existing infrastructure. It also raises the prospect that the separation between the Parish of South Wootton and the urban area of King's Lynn will be further eroded away, which the Parish Council will continue to strongly resist, and is contrary to the proposals which previously received Cabinet approval. The Parish Council understood that the retention of village status for 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 emerging proposals.
- 1.6 At this stage, the Parish Council 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, 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.

1.7 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 Parish of South Wootton. 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.

1.8 The report also provides more detailed responses to the draft policies SWOOTTON1 and KNIGHTSHILL which have been formulated by the Parish Council's Neighbourhood Plan Working Party. We hope the Borough Council will consider these comments positively, to ensure a consistency of approach between the Borough Council's Site Allocations Plan and the Parish Council's emerging Neighbourhood Plan which is likely to be prepared in draft for consultation by the end of 2013.

1.9 We trust the contents of this report, along with all representations and evidence previously submitted on behalf of the Parish Council 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.
- 2.2 This report has been prepared on behalf of South Wootton Parish Council who wishes to raise their objections to the current consultation document, specifically in respect to the scale of strategic growth which has been identified for South Wootton.
- 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 Parish of South Wootton:
- Land West of Hall Lane, South Wootton (located within South Wootton Parish) - Proposed allocation of 300 dwellings under Policy SWOOTTON1 Land North of King's Lynn;
 - North East of King's Lynn (adjacent Knights Hill – located partly within South Wootton and Castle Rising Parish) – Proposed allocation of 600 dwellings, 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 and 5.4 Knights Hill 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 6 of this statement in answer to the Borough Council's consultation questions.

Document Ref.	Issue
5.3	South Wootton
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..
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 then 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 Parish.
Draft Policy SWOOTTON1 Land North of King's Lynn	
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. Section 5 of this report sets out the Parish Council's preferred wording to be used in the description of South Wootton.
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 699 and not 233 as stated in the draft policy.
5.4	Knights Hill
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, ' <i>allocations will be made in King's Lynn through development at strategic locations</i> ' 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 Design Statement for the Village of South Wootton, published Autumn 2007;
- Emerging Neighbourhood Plan for South Wootton.

4.2 The purpose of the above plans are to help shape Parish Council policies and provide guidance to statutory agencies, including the Local Planning Authority, developers, landowners and businesses and to set the parameters for appropriate development within the Parish. 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 this document, 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 have been working hard on preparing 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 for the settlement of South Wootton (see Section 5), alongside realistic and appropriate growth expectations.

5 DESCRIPTION OF SOUTH WOOTTON

- 5.1 In an effort to retain the village identity of South Wootton, the Parish Council consider the following should replace paras 5.3.1-5.3.3 of the consultation document.
- 5.2 *"South Wootton is an attractive residential village on the northern side of King's Lynn; it has its own identity, a Quality Status parish council and a village centre with all the iconic features – a Green with a pond, post office, a large gastro-pub and the church tower. Residents are very aware of physical distinctions in our surroundings that mark a change between suburban Gaywood and the parish area; there is generally a softer appearance with more trees within the street scene and housing areas fringed by blocks and belts of woodland, with immediate access to countryside.*
- 5.3 *The historic buildings of the village are found mainly in a small area with the church and the Green, but from the 1920s this area and Castle Rising Road/Grimston Road were beginning to be built up. By the 1960s higher density housing development in Gaywood along Wootton Road had reached the parish, and the planned expansion of King's Lynn began to be visible here in many culs-de-sac of new private housing. In the 1970s and 1980s substantial housing estate developments were planned and completed, almost linking South and North Wootton save for a series of woods and open spaces. These natural areas create the boundaries that distinguish between two distinct villages, as well as retaining the separate focal points of each village. South Wootton housing also extended alongside Reffley Wood in a detached area almost one mile from the village centre, but is now linked by later development including shopping.*
- 5.4 *South Wootton as a location provides an important segment of the housing choice available in the King's Lynn area, and so much of the housing in the parish dates from the past 45 years that it is generally of the best standard. Work opportunities, sub-regional public services and retailing are within the built up area of King's Lynn, but the Community Identity of the parish stands separately and must be encouraged and enhanced by the provision of further community services and leisure facilities appropriately located in relation to any new development.*
- 5.5 *The parish council and residents who have responded to community consultations are opposed to the scale of the strategic housing areas west of the old village and at Knights' Hill which will increase the population by more than 40% in a 15 year period. This will undoubtedly impact on the existing community; it will distort the distribution of the population and their access to facilities, and will greatly increase traffic movements on Grimston Road and Low Road.*
- 5.6 *The character of new development must be focused on the creation of 'places' around spaces and landscape features attractive to wildlife interest that can truly augment this village community, and*

**Representations Submitted on Behalf of
South Wootton Parish Council**

Preferred Options Consultation for a Detailed Policies and Sites Plan
October 2013

BIDWELLS

through the extended foot and cycle path links and services that must enhance the integration of the already outlying and any additional new areas."

6 RESPONSE TO CONSULTATION QUESTIONS

Context & Background

- 6.1 As referenced in para 5.3.6 of the consultation document, the adopted Core Strategy does 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 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.
- 6.2 Objections are raised by South Wootton Parish Council 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. This scale of growth would reduce the gap between the development boundaries of South Wootton Parish and the urban area of King's Lynn, whilst also threatening the character and the development boundaries with the adjacent Norfolk Coast AONB.
- 6.3 There is also the question of the impact on the existing community about the service and traffic impacts which will fall disproportionately on South Wootton due to the layout of the area and the sheer number of community and utility service issues which remain unresolved.
- 6.4 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 re-affirmed in this report, South Wootton Parish Council uphold their objections to the scale of development now proposed by this consultation document.
- 6.5 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.

- 6.6 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 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. 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 Parish Council 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. Increasing the scale of growth envisaged within South East King's Lynn can only assist in the viability of delivering key infrastructure as part of a larger development allocation.

Questions: South Wootton

Do you have any comments on the proposed development boundary?

- 6.7 The Parish Council do not consider that the proposed development boundary as currently drawn accurately reflects 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?

- 6.8 The Parish Council 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 long term flood risk and 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 Parish Council considers to be inappropriate for the identity and character of the existing settlement to be retained. The impact on services and facilities will fall disproportionately on South Wootton and not Castle Rising or Gaywood wards of King's Lynn which the Parish Council will continue to resist.

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

6.10 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

6.11 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 Parish would consider is an appropriate density, comparative to the majority of development within the South Wootton Parish, this would equate to **a total on the SWOOTTON1 allocation of 225 dwellings.**

6.12 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 Council that based upon the figures, and due to the severity of the flood risk constraint identified above, that the proposed site allocation is reduced from 300 to 225 dwellings. 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.

6.13 For the reasons provided above, the Parish Council considers 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.

6.14 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 threatening the legal robustness of the SA/SEA processes and could easily render the site undeliverable. This could then seriously jeopardise the delivery of the Borough's planned housing targets in the longer term.

6.15 Section 7 of this report sets out the preferred wording for draft policy SWOOTTON1 which has been prepared collectively by the Neighbourhood Plan Working Party, to help provide consistency of approach and conformity between the Borough Council's aspirations for the site allocations plan and the Parish Council's emerging Neighbourhood Plan.

6.16 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?

- 6.17 The Parish Council would not wish to suggest any further alternative sites.
- 6.18 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.
- 6.19 With regards to the alternative options considered, the Parish Council 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 through the Borough Council's consultation document 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?

- 6.20 No further comments to make regarding the proposed development boundary.

Do you have any comments on the draft allocation KNIGHTSHILL?

- 6.21 Whilst it is acknowledged that the Borough Council has now reduced the proposed allocation from 750 to 600 dwellings in response to local and statutory consultee concerns, the Parish Council still contend that the scale of development proposed is too large when compared to the cumulative 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 further (not within South Wootton) adjacent to King's Lynn where environmental/infrastructure capacity exists to accommodate more significant development.
- 6.22 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 scope of the existing constraints of the local highway network, allowing for deliverable improvements to adequately mitigate the impacts of the proposed growth.

- 6.23 Whilst it is acknowledged that the Hall Lane site allocation has been reduced by over 50%, in order to achieve a net reduction of 50% across the two allocation areas, the Parish Council contend that the Knights Hill allocation should be further reduced from 600 to 475 dwellings (see also para 6.24). This will also assist in avoiding some of the significant nature conservation and environmental consequences, identified by us and others through the previous consultation.
- 6.24 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.
- 6.25 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 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.
- 6.26 It is the view of the Parish Council that the Habitat Regulations Assessment (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.
- 6.27 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.

- 6.28 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.
- 6.29 Overall, we contend that the site options have been put forward without sufficient 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.
- 6.30 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. 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.
- 6.31 In view of the above, the Parish Council 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, at most, to Phase 1 only, to acknowledge the sensitivities of the immediate environment. Section 8 of this report sets out the Parish Council Neighbourhood Plan Working Party's suggested additions/revisions to help inform the Borough Council's re-drafting of the draft policy for KNIGHTSHILL.

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?

- 6.32 The Parish Council 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.

- 6.33 Consequently, it is our contention that if the Borough Council, through the SA process, assessed alternative site options, the scale/extent of development proposed for allocation through draft policy KNIGHTSHILL could 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 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.
- 6.34 With regards to the alternative site options considered, the Parish Council 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 Runcton), 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.

7 DRAFT POLICY SWOOTTON1

- 7.1 WITHOUT PREJUDICE to the Parish Council's general opposition to this draft policy, the following text is recommended by the Parish Council's Neighbourhood Plan Working Party for the Borough Council's consideration in redrafting Policy SWOOTTON1.

"Development and associated facilities for 225 houses is allocated within an area of circa 20ha as shown on the Policies Map subject to the following Preliminary studies and consequential submitted detailed schemes:-

Submission of the following prior to allocation, for agreement by the LPA in consultation with relevant public authorities, including the Parish Council(s) –

- a) a site specific Flood Risk Assessment with topographical survey and geotechnical studies to determine the extent of flood risk from both tidal sources and building constraints due to upland groundwater and geological conditions; and thereby to determine the limitations on the areas available for a residential development with vulnerable related facilities and services, and their distribution within the allocation site;*
- b) a Landscape and arboricultural assessment, and their use to submit a strategic landscape framework for the allocation site;*
- c) an ecological study of the fauna (notably birds and reptiles) and flora of the designated area within its local environmental context; and the identification of mitigation measures and areas to be protected and retained for these interests;*
- d) an archaeological assessment, with review of the submitted information, and relevant on-site investigations;*
- e) a Masterplan indicating how it is proposed that the outcome of these studies are to be integrated to create an addition to the separate village community at South Wootton. The inclusion of neighbourhood shops, small-scale employment premises, and community facilities would be welcome.*

Planning Application Requirements -

1. *The design of residential areas with a variety of house sizes and types (generally not exceeding 2 storey height), relevant to local market conditions and choice, with mixed*

tenures. Affordable housing provision in accordance with the LPA standard of 15% in the King's Lynn built up area;

- 2. The retention of the present treed field boundaries as part of existing and new landscape cells, with appropriate reinforcement planting suitable to maintain these as tree belts and wildlife corridors, as researched by item (c) above; the provision of structural landscaping as part of the visual appearance of the new development areas, and in the western parts of the designated area. Surface water drainage shall be based on SUDS principles. Noise levels shall be surveyed in the southern parts of the site, to secure WHO compliant residential conditions.*
- 3. The provision of public open spaces and wildlife areas, and of equipped play areas within the residential developments. Recreational open space shall be based on 2.4ha per 1000 population/2.33 ppd, and is estimated to require at least 1.7ha within the site.*
- 4. A new District Distributor road across the area from a junction/roundabout at Nursery Lane to a signal-controlled junction onto Edward Benefer Way, with other local highway improvements to fully integrate the development into the surrounding road network. The Distributor road shall be built by any development consortium acting jointly so that public access is available throughout its entire length before the occupation of more than 50 houses in the new allocation (or such precise timescale as may be agreed by the LPA after local consultation with the Parish Council).*
- 5. Construction access to the designated area shall take place at all times from the northern and southern ends of the Distributor road route only. Access through the existing village will not be permitted.*
- 6. Linkages with existing streets in South Wootton shall be restricted to the construction of surfaced and lit cycleways and footways only, into Church Lane and Meadow Road.*
- 7. The internal layout of the area shall facilitate travelling on foot and by bicycle, including connections with the National Cycle network route 1 locally, and the proposed coastal path, and shall provide new bridleways.*
- 8. South Wootton Junior School: land shall be provided for the expansion of this school site. The primary vehicle access for the whole school site and adequate parking shall be created from the new development land, and visitor access to Hall Lane restricted.*

Financial contributions will also be required for other County education services in the normal way.

9. *Doctors' group surgery: subject to further investigations, a surgery site and part-funding of its construction, or construction contributions to a new site elsewhere in the parish, will be required.*
10. *Infrastructure : extension and upgrading to public utility services is anticipated.*
11. *Habitat protection measures. A package is to be agreed to mitigate the potential adverse effects in this part of the Borough of recreational pressures associated with this scale of development. This is due to the frequency of nature conservation sites covered by the Habitat Assessment Regulations within short driving distances. This package of measures will require specialist design and assessment, but is to enhance alternative sites and is anticipated to include the following for which proportionate contributions will be required:- i) enhancing the informal recreational provision on and in close proximity to the allocated site, in order to limit pressure on nearby nature conservation sites (and notably related to exercising dogs) ; this will include assessment of the design and usefulness of all informal open spaces on the site; ii) ensuring and enhancing a network of attractive pedestrian routes, providing variety of terrain, routes and links to the wider public footpath network; and iii) contributing to the enhanced management of nearby nature conservation sites and green spaces, including a programme of awareness raising about environmental sensitivities and alternative recreational opportunities.*

8 DRAFT POLICY FOR KNIGHTSHILL

- 8.1 WITHOUT PREJUDICE to the Parish Council's general opposition to this draft policy, the following text is recommended by the Parish Council's Neighbourhood Plan Working Party to help influence any redrafting undertaken by the Borough Council to draft policy KNIGHTSHILL.

"This designated area has two different characters – a relatively enclosed area on the lower hill slopes, and an open sweeping area beyond Reffley Wood up to the hill top, partly forming a shallow bowl facing west but also with exposed slopes to the south, and to the east around the Knights Hill Hotel complex.

Development and associated facilities for no more than 475 dwellings is allocated as shown on the Policies Map subject to the following Preliminary studies and consequential submitted detailed schemes:-

Submission of the following, prior to allocation, for agreement by the LPA in consultation with relevant public authorities, including the Parish Council(s) -

- a) a site specific Surface Water Drainage Strategy & Risk Assessment, based on a topographical survey with 0.5 metre contours and geotechnology studies to determine the building constraints due to upland groundwater and geological conditions;*
- b) a Landscape strategy and detailed arboricultural assessment, including the extent to which the site is visible from the south-east and the degree to which it is affected by traffic noise;*
- c) an ecological assessment, with reference to information and advice from the Norfolk Wildlife Trust and the Woodland Trust for the adjacent designated nature conservation sites;*
- d) an archaeological assessment and any relevant on-site investigations;*
- e) traffic noise levels calculated over an 18 hour period, to determine the limitations on the parts of the site available for any residential development compliant with WHO standards with vulnerable related facilities and services;*
- f) the design of a safe principal access from the main part of the designated area onto the A148 Grimston Road east of no.180, with sufficient detail of existing and proposed ground works and levels, and designed for all classes of vehicles on this heavy lorry route to King's Lynn Docks and industrial estates;*

- g) a Minerals assessment, to determine the potential for any workable silica sands on the upper parts of the site;*
- h) a Masterplan indicating how it is proposed that the outcome of these studies are to be integrated internally and externally to create a part of the wider community of South Wootton.*

Planning Application Requirements -

- 12. The design of residential areas with a variety of house sizes and types (generally not exceeding 2 storey height), relevant to local market conditions and choice, with mixed tenures. Affordable housing provision in accordance with the LPA standard of 15% in the King's Lynn housing area; subject to the following constraints :-*
- 13. The use of Landscaping to respect adjoining woodland and existing trees and to be part of a housing layout which facilitates provision and maintenance of a high level of planting and to safeguard and support wildlife. The planting strategy shall utilise the southern and eastern edges of the site, and where housing will not be acceptable above the 42.0m AOD contour due to its likely visibility outside the site to the east and north.*
- 14. Public open spaces and wildlife areas shall be provided, with equipped play areas within the residential developments. Recreational open space shall be based on 2.4ha per 1000 population/2.33 ppd.*
- 15. The principal access is to be from A148 Grimston Road at the northern end of the site; its design study is one of the prior feasibility studies for the site – as listed above. Other secondary and emergency accesses shall be identified in the Masterplan.*
- 16. The area shall be linked with existing bridleways, cycleways and footpaths and by provision of a new cycleway bridge at Sandy Lane above the A149 to the east; the internal layout of the area shall facilitate travelling on foot and by bicycle with particular reference for routes to schools and district shopping in the north-east of the King's Lynn and Woottons built up area. Public Transport developer contributions will be required for new bus routes.*
- 17. Surface water drainage shall be based on SUDS principles.*
- 18. Schools. Land and premises shall be provided for any nursery/infant or junior school provision which is found to be required in relation to this additional development at the*

eastern end of the South Wootton community. It seems uncertain whether Junior school provision will occur on site after amendment of present catchments to South Wootton and Reffley Primary schools, and financial contributions will be required for other County education services in the normal way.

19. *Doctors' group surgery : subject to further investigations, part-funding contributions will be required for a new or extended Group surgery serving South Wootton from a site elsewhere.*
20. *Infrastructure : extension and upgrading to all public utility services is anticipated, including water supply, sewerage, electricity and gas.*
21. *Habitat protection measures. A package is to be agreed to mitigate the potential adverse effects in this part of the Borough of recreational pressures associated with this scale of development. This is due to the frequency of nature conservation sites covered by the Habitat Assessment Regulations within short walking and driving distances. This package of measures will require specialist design and assessment, but is to enhance alternative sites and is anticipated to include the following for which proportionate contributions will be required:-*
 - i) *enhancing the informal recreational provision on and in close proximity to the allocated site, in order to limit pressure on nearby nature conservation sites (and notably related to exercising dogs) ; this will include assessment of the design and usefulness of all informal open spaces on the site;*
 - ii) *ensuring and enhancing a network of attractive pedestrian routes, providing variety of terrain, routes and links to the wider public footpath network;*
 - iii) *contributing to the enhanced management of nearby nature conservation sites and green spaces, including a programme of awareness raising about environmental sensitivities and alternative recreational opportunities.*

9 SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT

- 9.1 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'*.
- 9.2 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.
- 9.3 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 cannot 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

- 9.4 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.
- 9.5 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.
- 9.6 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.

10 CONCLUSIONS/SUMMARY

- 10.1 South Wootton Parish Council 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.
- 10.2 Based upon technical evidence, the Parish Council consider the scale of growth proposed by draft policy **SWOOTTON 1 should be reduced from 300 dwellings to 225 dwellings**, covering half the proposed allocation site. The growth proposed by **draft policy KNIGHTSHILL should also be reduced from 600 dwellings to no more than 475 dwellings**, subject to acceptable densities to reflect local village character and further technical evidence, across Phase 1 land only.
- 10.3 The Parish Council suggests 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 Borough Council's Sustainability Appraisal/Strategic Environmental Assessment processes.

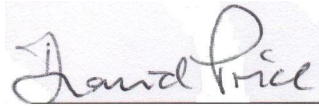
**Representations Submitted on Behalf of
South Wootton Parish Council**

Preferred Options Consultation for a Detailed Policies and Sites Plan
October 2013

BIDWELLS

Mr David Price, Chairman of South Wootton Parish Council

Signed

A handwritten signature in dark ink, appearing to read 'David Price', is written over a light blue horizontal line.

Date

October 2013

Appendix 1

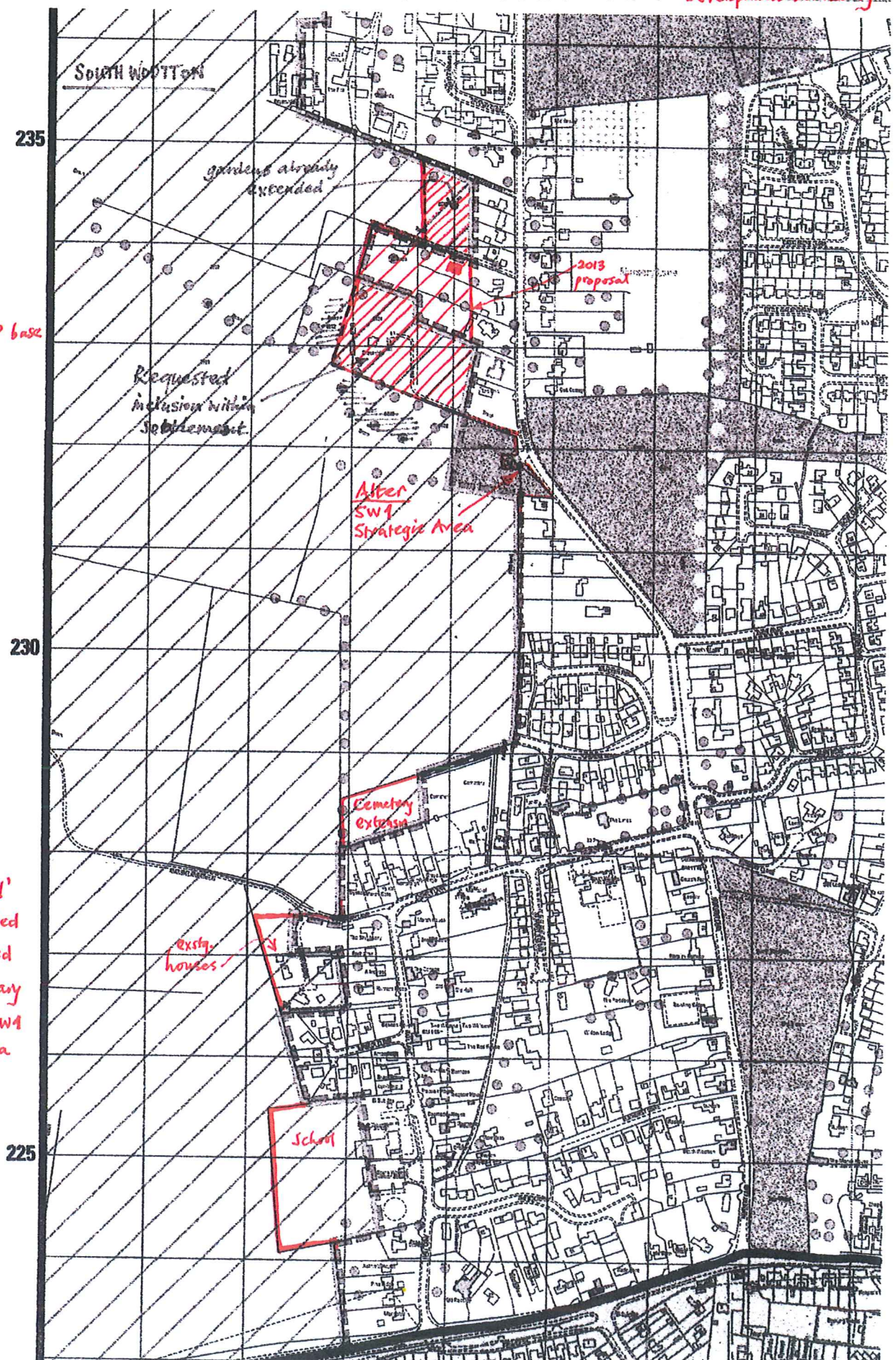
South Wootton Development Boundary

DETAILED POLICIES & SITES

Consultation July 2013 - SOUTH WOOTTON
Development boundary

ADD
Existing
residential
curtilages,
using 1998 LP base

ADD
3 'developed'
sites, omitted
from proposed
Devlp't boundary
and from SW4
Strategic Area



bidwells.co.uk

BIDWELLS

Bidwells is the UK's
leading regional
property consultancy.

