

Borough Council of
**King's Lynn &
West Norfolk**



**Borough Council of King's Lynn and West Norfolk's
Response to
the Issues and Questions raised by Inspector David
Hogger
in relation to the
King's Lynn and West Norfolk Local Plan:
Site Allocations and Development Management
Policies**

**Issue 6:
South Wootton (E.3)**

Examination
June 2015

Table of abbreviations used in the Council's Statements

Abbreviation	Full Wording
AONB	Area of Outstanding Natural Beauty
BCKLWN	Borough Council of King's Lynn and West Norfolk
BDC	Breckland District Council
CLG	Communities and Local Government
CITB	Construction Industry Training Board
CS	Core Strategy
DM	Development Management
DPD	Development Plan Document
EA	Environment Agency
FDC	Fenland District Council
FRA	Flood Risk Assessment
GI	Green Infrastructure
GTANA	Gypsy and Traveller Accommodation Needs Assessment
ha	Hectare
HELAA	Housing and Economic Land Availability Assessment
HLF	Heritage Lottery Fund
HRA	Habitats Regulation Assessment
HSEHA	Health and Safety Executive Hazard Areas
IDB	Internal Drainage Board
KRSC	Key Rural Service Centres
KLATS	King's Lynn Area Transportation Strategy
LDS	Local Development Scheme
LLFA	Lead Local Flood Authority
LPSO	Local Plan Sustainability Objectives
NCC	Norfolk County Council
NE	Natural England
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NORA	The Nar Ouse Regeneration Area
NWT	Norfolk Wildlife Trust
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RV	Rural Village
RAF	Royal Air Force
RLA	Residential Land Assessment
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SADMPP	Site Allocation and Development Management Policies Plan
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SMP	Shoreline Management Plan
SPA	Special Protection Area
SSF	Site Sustainability Factors
SSSI	Site of Special Scientific Interest
SuDs	Sustainable Drainage systems
SVAH	Smaller Villages and Hamlets
SWMP	Surface Water Management Plan
THI	Townscape Heritage Initiative
UPC	Un-attributable Population Change

Response to Questions:

6.1

Is there evidence that any elements of the proposed development in South Wooton (E3.1) are not justified, sustainable, viable, available or deliverable?

If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

1. BCKLWN believes E3.1 provides a practical and sensitive resolution of the competing interests and considerations involved in delivering the strategic growth identified in the Core Strategy.
2. It does not consider that a case has been convincingly made that 300 dwellings is excessive and should be reduced to 225 or less, as suggested on behalf of the Parish Council and by some local residents,. While BCKLWN supports the intention for a spacious and well landscaped development which relates well to the existing development in South Wooton, it does not agree that this needs to slavishly follow the character and density of existing development to do so, nor that the existing is so uniform in as to provide a clear template. In order to arrive at its preferred maximum of 225 dwellings the Parish Council's agents (ID 825, etc.) have not only assumed a low density, but also discounted strategic open space, road infrastructure, and SuDS features from its claimed low flood risk area, when most of these would probably go on the higher flood risk area. On the basis of its own figures, without such discounts the resulting 291 dwellings more or less tallies with the SADMP proposal.
3. Neither has it been demonstrated that the development could and should be much larger. Maxey Grounds & Co. (ID 281) has claimed that the site can satisfactorily accommodate 500 dwellings, but has not provided to BCKLWN any layout to indicate that this can be satisfactorily achieved (and recently confirmed none had yet been prepared). They have also claimed that they have had a site

flood risk assessment indicating that a greater proportion of the site is at a low risk of flooding than indicated by the SFRA, and that this has been provided to BCKLWN. No record of such a submission has been found, and despite a request to Maxey Associates for a (further) copy of that assessment, none has been forthcoming.

4. In the absence of a realistic expectation that it could be achieved it would not be appropriate for such an allocation to be included in the plan. The possibility that the site could potentially accommodate a larger development is, however, addressed in paragraph E.3.13.

5. No suggestion has been made by any party that the 300 dwellings proposed in the SADMP is not viable. Maxey Grounds & Co. have confirmed on behalf of the owners of the majority of the site (Kilham, Nixon, Anderson and Palmer families) that it is available now, and if allocated would be developed over the periods 2014/15-2018/19 and 2019/20-2023/24. Norfolk Property Services, on behalf of minority landowner NCC, has confirmed it will work with the other owners to deliver development on the site (ID 105).

6. The Local Highway Authority have raised no objections to the proposal (though along with other commentators have pointed out it erroneously refers to a junction to Low Road, rather than its continuation, Edward Benefer Way, and BCKLWN proposes an amendment to the Policy to correct this). The LHA has confirmed to BCKLWN that it is satisfied that the main A1078/A148 road (Edward Benefer Way, Low Road, Grimston Road) is capable of accepting the individual and cumulative additional traffic associated with E3.1 (Hall Lane, South Wootton), E4.1 (Knights Hill) and the new Lynnsport Access Road (due to be constructed shortly and associated with the E1.4, Marsh Lane, and E1.7 Lynnsport allocations), but has warned that higher numbers than currently proposed may be more difficult to mitigate.

7. BCKLWN have been advising and assisting South Wootton Parish Council in preparing a Draft NP which includes the E3.1 site, and encouraged the Parish Council to support the allocated development and use the NP to shape it. The Parish and Borough Councils have influenced one another's plans. BCKLWN does have outstanding concerns about some aspects of the submitted Draft NP (included in the Examination Library), and hopes these will be resolved through the imminent NP examination.

8. In line with paragraph 6 above, BCKLWN proposes that Policy E3.1 is amended by correcting clause 1,e,l to refer to Edward Benefer Way, rather than Low Road.

6.2**Have the implications of the Minerals Safeguarding Area been addressed by the Council?**

1. BCKLWN agrees with NCC's suggestion to amend paragraph E.3.9 by adding the following text.

“The site is partially underlain by a Mineral Safeguarding Area (Sand and Gravel). Site investigation and assessment of the mineral resource will be required to comply with Norfolk Minerals and Waste Core Strategy policy CS16. It is considered that due to the topography of the site the potential for prior extraction is limited, however the possibility of the re-use of mineral resources recovered from groundworks and SUDS infrastructure should be considered.”

2. BCKLWN considers that this modification alone is required to ensure the plan is effective in alerting developers to potential issues and the existing development plan policies, and consistent with national policy in terms of safeguarding mineral resources.