



Our Ref: 4794
Your Ref:

15 January 2016

Julie Belding, Programme Officer

Kings Lynn and West Norfolk Local Plan Examination

programme.officer@west-norfolk.gov.uk

Dear Ms Belding,

This letter is further to your emails of 11th & 16th December 2015 which invite us to provide comments on the suggested amendments to the plan. Accordingly, please accept this letter as our formal comments on behalf of the Castle Rising Estate.

As per the parameters of this consultation, our comments are restricted to the issues in which we participated. Our comments focus on the policy and supporting text for the proposed allocation at Knights Hill.

Although we remain opposed to the proposed allocation in principle, if the allocation is retained, we believe a number of changes are required. These are set out in this letter.

Comments on proposed modifications to the chapter on Knights Hill

We understand that the chapter on Knights Hill has been modified following our letter to Alan Gomm of 14 September 2015 (appended to this letter). We are supportive of the modifications to the chapter which seek to increase the importance of Castle Rising, its setting and the need to prevent built development towards the north of the proposed allocation. However there are further modifications which we feel are necessary in order to sufficiently mitigate the effects of the proposed allocation on Castle Rising and its setting. These are set out below.

Proposed modifications to Policy E4.1 Knights Hill

We are supportive of the following proposed modifications to Policy E4.1 Knights Hill:

- The requirement for development being subject to 'a comprehensive transport assessment of the impacts of the proposed development including consideration of the combined impacts with other planned development on Low Road/Grimston Road'.
- The increased importance given to the presence of constraints (in addition to flood risk) in determining the scope of land which may be appropriate for residential development.
- The modification to the density requirements to include a caveat that the overall density is subject to appropriate consideration of constraints identified. However we feel the wording could be strengthened as per our letter (appended).
- The increased emphasis on the importance of the effectiveness of landscape planting to protect heritage assets. However the proposed modification falls significantly short of the protection measures outlined in our proposed wording. It is very important to maintain the open landscape setting to the higher ground in the north and east, in addition to the landscape planting to the east and north of the development and screening between this area and proposed housing to protect the setting of heritage assets.
- The additional wording indicating that the creation of public open space is necessary in order to reduce the pressure on adjoining areas including Castle Rising, Dersingham Bog and Roydon Common.





One of our proposed modifications has not been addressed: We consider that the proposed allocation should be for 'up to 400 dwellings', rather than 'around 600 dwellings'. The criteria of 'around 600 dwellings' is inconsistent with the remainder of the modified policy, which seeks to limit the density and extent of dwellings to what is appropriate following further assessment of constraints (including the impact on Castle Rising and its setting). We suggested that the text should be modified to require 'up to' rather than 'around', as this allows for greater flexibility. We consider this is likely to be necessary given the significance of known constraints. We proposed the figure of 400 dwellings rather than 600 dwellings as our assessment of constraints indicates that a large open area would be necessary towards the north of the site (as indicated on our plan appended with our letter).

Proposed modifications to the supporting text to Policy E4.1 Knights Hill

We are supportive of the proposed modifications to paragraphs which are as per our request:

- E.4.3
- E.4.5
- E.4.20
- E.4.22
- E.4.23

In addition to these proposed amendments, we consider that the following modifications should be made, as per our original letter:

- The following sentence should be added at the end of paragraph E.4.7: 'A significant area of open landscape needs also to be retained in the north and east of the site, retaining the landscape and visual connection to the north and based on the rising contours that form part of the setting and former hunting chase to Knights Hill and Castle Rising'.
- Affordable housing provision should be required as per the Kings Lynn urban area (paragraph E.4.25).

Conclusion

Whilst we are supportive of the modifications proposed and consider the revised wording is more appropriate, we consider that in order to fully protect Castle Rising and its setting, a further few modifications are necessary. These have been outlined above, and are set out in our letter to Alan Gomm of 14 September 2015, appended to this letter.

I trust we have provided sufficient information in our comments, but if you have any queries, please do not hesitate to contact either myself or colleague Sarah Evans on 020 7222 8345.

Yours Sincerely,



Steven Fidgett
Head of Planning (UK)
For and on behalf of WYG



Our Ref: 4794
Your Ref:

14 September, 2015

Mr A Gomm

Planning Policy
Borough Council of Kings Lynn and West Norfolk
Kings Court
Chapel Street
Kings Lynn



Dear Alan

Thanks for agreeing to meet recently on the above. As requested, I have attached and below is the draft text and Knights Hill Growth Area plan E4.1 that illustrates the principles behind the potential amendments we discussed and which could be agreed as a minimum in addressing the objections submitted on behalf of the Castle Rising Estate.

These are submitted on a without prejudice basis at this stage pending further discussion of the principles set out.

The strategic growth areas identified in the Core Strategy were stated to be subject to review in accordance with identified constraints at this stage of the Plan process in order to define the extent of development and the relevant opportunities and constraints that were appropriate to each and a number of matters were deferred until this point. Hence as we discussed, I think we agreed that the SADMP needs to identify the relevant constraints and opportunities at this stage to help set the parameters for any future planning application. The proposals we have set out reflect our assessments of these constraints thus far and reflect what we feel is more appropriate approach to the historic landscape and landscape setting of the site than that proposed in the plan, which was essentially based on the principle of perimeter screening of development without the necessary assessment.

While we have not at this stage seen the plans you referred to in our meeting that indicate the landowners current thoughts, nor the earlier pre-application proposals (we would note they are not the same as those included in their evidence to the SADMP), the plan we have proposed represents the minimum that we would hope to see included in the SADMP in place of the current Growth Area Plan.

The policy wording suggested by WYG on behalf of the Castle Rising Estate is below. Elements that differ from the original text are in blue and deletions in red:

"Policy E4.1 Knights Hill

An area of land, approximately 36.9 ha, to the south of Grimston Road and east of Ullswater Avenue and Ennerdale Drive, is allocated for development of **up to 400 (around 600)** dwellings over the period to 2026.

Development will be subject to detailed assessment and scrutiny of the following issues which are likely to affect the extent and design of the development:

- A.**
 - a. Site Specific Flood Risk Assessment;





- b. Ecological assessment;
- c. Landscape and arboricultural assessment;
- d. Mineral assessment; and
- e. Heritage assessment.

The development will provide:

1. Residential development (of the substantial majority of the land available for development and not excluding the area precluded by flood risk or other constraints, to include
 - I. A variety of house sizes, types and tenures.
 - II. Affordable housing commensurate with the local planning authority's standards at the time
 - III. A site, or sites, which could be utilised for neighbourhood shops, a doctor's surgery, and community facilities.
2. An overall density of around 16 dwellings per hectare, with variation across the area to provide a lower density in the western part of the site, blending with the existing spacious suburban development to the west, (and a higher density to the north providing a more urban character and a greater population density close to Grimston Road and its bus Routes);
3. Tree planting and retention within the site, and a layout which facilitates the provision and maintenance of a high degree of landscape planting to soften the visual appearance of the development and to support wildlife. A 50 metre buffer around the Reffley Wood ancient woodland;
4. The maintenance of an open landscape setting to the higher ground in the north and east (Landscape planting to the east and north of the development to provide a degree of screening of the development and) with screening between this area and proposed housing to protect the setting of heritage assets including the Knights Hill complex, Castle Rising Castle and the remains of Church of St James and surrounding Saxon/medieval settlement;
5. A new road from north to south, providing:
 - a. access to the new dwellings;
 - b. a new, roundabout junction with Grimston Road; and
 - c. a second access point is also required.
6. A layout which facilitates travelling on foot and by bicycle within, and to and from, the new development area,
7. Public open space for recreation and visual amenity and to reduce the pressure on adjoining areas including Castle Rising, Dersingham Bog and Roydon Common,
8. A new doctor's surgery within or close to the site.
9. Upgrades and extensions to the following infrastructure to service the development:
 - a. water supply
 - b. sewerage
 - c. electricity
 - d. telephone.
10. Financial contributions towards the provision of infrastructure including additional primary and secondary school places;



11. Submission of a project level habitats regulations assessment, with particular regard to the potential for indirect and cumulative impacts through recreational disturbance to the Dersingham Bog and Roydon Common Special Areas of Conservation.
12. An agreed package of habitat protection measures, to mitigate potential adverse impacts of additional recreational pressure (particularly in relation to exercising dogs) associated with the allocated development upon nature conservation sites covered by the habitats assessment regulations. This package of measures will require specialist design and assessment, but is anticipated to consist of an integrated combination of some or all of the following elements:
 - a. Informal open space (over and above the Council's normal standards for play space);
 - b. A network of attractive pedestrian and cycle routes, and car access to these, which provide a variety of terrain, routes and links to the wider public footpath and cycle way network;
 - c. Contribution to enhanced management of nearby designated nature conservation sites and/or alternative green space;
 - d. A programme of publicity (to occupants within and beyond the site) to raise awareness of relevant environmental sensitivities and of alternative recreational opportunities.

SUPPORTING TEXT

E.4 Knights Hill

Description

E.4.1 The Knights Hill Strategic Growth Area includes parts of the parishes of South Wootton and Castle Rising together with part of the unparished town area of King's Lynn. The village of Castle Rising is to the north and King's Lynn urban area lies to the south and south-west. The surrounding built environment predominantly consists of modern single and two storey, semi-detached and detached residential development. The Growth Area extends beyond the village of South Wootton in a north east direction along the A148 Grimston Road and in a southerly direction towards the A149 Queen Elizabeth Way. The terrain rises north-eastwards across the site.

E.4.2 The area has relatively easy access to facilities in South Wootton. Regular bus services run between King's Lynn and Hunstanton past the site and links can be made to the cycle path network to offer a choice of sustainable commuting options to employment locations such as the Hospital, North Lynn and Hardwick Industrial Estates and Town Centre.

E.4.3 Reffley Wood, an Ancient Woodland and County Wildlife Site, is immediately south-west and west of the growth area; the southern boundary of the Norfolk Coast Area of Outstanding Natural Beauty follows the northern side of the A148 Grimston Road, close to the site. Roydon Common, which is a National Nature Reserve, Site of Special Scientific Interest and Special Area of Conservation; and Grimston Warren, a County Wildlife Site; are situated to the east, beyond the A149 Queen Elizabeth Way. There are other County Wildlife Sites in North Wootton. The Gaywood River Valley lies to the south of the site. There are several heritage assets [and their settings within](#) the surrounding area, including the Knights Hill Hotel (Grade II listed Rising Lodge) to the north-east, Castle Rising Castle (Scheduled Monument and Grade I listed building) and Church of St Lawrence, Castle Rising (Grade I listed) to the north, and the remains of Church of St James (Scheduled Ancient Monument and Grade I listed) and a Saxon and medieval settlement (Scheduled Monument) to the south. [It is important to consider these assets and their settings, including the historic landscape associated with them and ensure that these are preserved and enhanced.](#)

E.4.4 The complex nature of the settlement pattern in the area and the nature of the supporting infrastructure mean that many factors need to be brought together to enable the most appropriate form of development to be decided. This is likely to be best achieved through the development of a masterplan for the whole area.



Strategic Context

E.4.5 The independent planning inspector who examined the Core Strategy explicitly stated that, compared to the potential alternatives, the expansion areas identified (and Knights Hill was one of these, see King's Lynn Diagram/Core Strategy) were preferable to the alternatives [subject to the consideration of constraints](#). (It is unconstrained by flood risk and infrastructure problems, etc., and relatively easily accessed and serviced). Policy CS03 of the Core Strategy states that at least 7,510 new dwellings will be provided within and around King's Lynn. Existing completions and commitments will provide a significant part of that figure, hence Policy CS09 states that a minimum of 5,070 are to be allocated in locations in the King's Lynn area.

E.4.6 No specific number of new dwellings is assigned to Knights Hill by the Core Strategy, so setting the balance between this and the other strategic expansion areas of South Wootton and West Winch/North Runcton is part of the role of this plan document. This balance will need to weight the relative constraints and opportunities associated with each of these areas, whilst seeking to accommodate the dwellings indicated by the Core Strategy between these three sites.

E.4.7 A buffer is needed to protect the area of Ancient Woodland at Reffley Wood at the southern end of the site. This will impact on potential housing numbers; hence the reduction from the original proposal of 750 dwellings to 600. [A significant area of open landscape needs also to be retained in the north and east of the site, retaining the landscape and visual connection to the north and based on the rising contours that form part of the setting and former hunting chase to Knights Hill and Castle Rising.](#)

E.4.8 One of the constraints is the potential for an adverse impact on the designated nature conservation sites; Dersingham Bog and Roydon Common Special Areas of Conservation. These issues are addressed in the accompanying Habitats Regulations Assessment Report. The HRA issues in relation to impacts from increased recreational pressure relate to impacts on Special Area of Conservation habitats and impacts on rare ground nesting birds (principally nightjar and woodlark) and rare wintering birds (principally hen harrier roost).

E.4.9 Like the existing built up area in the vicinity, development here would be visible but not prominent in a range of distant views, but could be softened by trees and other planting within and on the boundary of the developed area.

E.4.10 Some strategic issues with existing infrastructure have been identified (as detailed below) but the Council considers that further discussion with particular infrastructure providers at this stage should enable key issues to be resolved.

Neighbourhood Plan

E.4.11 South Wootton Parish Council is preparing a Neighbourhood Plan for its parish, which includes part of the allocated area. This offers the opportunity for the local community to shape the development. The neighbourhood plan can determine the detail of the development, but must be in general conformity with the strategic policies of the Local Plan.

E.4.12 The Borough Council supports the Parish Council's endeavours in preparing this neighbourhood plan, and its emerging approach to development in the area have influenced this plan in particular resulting in a reduction in the number and density of dwellings to be provided on the site. Only part of this allocation falls within the parish boundaries.

Site Description and Justification



E.4.13 The site's owners have actively engaged with the Borough Council to discuss and address the issues involved, giving a high degree of confidence that the site is genuinely available for development. The indicated site totals around 37 ha.

Boundaries

E.4.14 The boundaries of the allocation are set by the existing development (Ennerdale Drive and Ullswater Avenue and Reffley Wood to the west; the A148 Grimston Road to the north and the A149 Queen Elizabeth Way and the Knights Hill complex to the east).

Local centre(s)/Retail

E.4.15 The nearest local retail centre for this development is the ASDA centre at Langley Road, South Wootton, about half a mile (0.8 km) to the west of the site or three-quarters of a mile (1.2 km) from the centre of the allocated area.

Transportation Roads

E.4.16 Access would be from the A148 Grimston Road. A secondary access point would be required by the Highway Authority.

Public transport

E.4.17 There are existing (hourly) bus services on the Grimston Road between King's Lynn town centre and Hunstanton (Coasthopper).

Cycling and Walking

E.4.18 Connections can be made to the existing cycle network further west. Improved pedestrian access can be provided to local facilities to the west of the site and also to the Knights Hill complex to the east.

Employment

E.4.19 The nearest major main employment areas are the Hospital, Hardwick and North Lynn Industrial Estates and the Town Centre.

Protected Habitats

E.4.20 The Plan's Habitats Regulations Assessment Report identified the need for measures to ensure [that there is](#) no adverse impact on the nearby designated nature conservation areas through exacerbation of existing adverse recreational impacts. These are incorporated in the policy.

Open Space

E.4.21 On site open space provision would be required together with landscape/ecological buffers to protect existing ponds on the site and to deal with the concerns expressed about the proximity of development to ReffleyWood and the Knights Hill complex. Landscape buffers would be needed to the A149 boundary of the site to reduce the impact and perception of traffic noise.

Design the area to provide a lower density in the western part of the site, blending with the existing spacious suburban development to the west, [and a higher density to the north, providing a more urban character and a greater population density close to Grimston Road and its bus routes](#). A mix of house types including 1 and 2 bedroom flats and 1, 2, 3 and 4 or 5 bed houses should be provided.

Heritage and Landscape

E.4.23 The heritage assessment should include both on-site archaeological evaluation and an assessment of the impact on heritage assets beyond the site, including views to/from [important](#) heritage assets [in particular](#) [\(such as\)](#) Castle Rising Castle, the Knights Hill complex and Church of St James and surrounding Saxon/medieval settlement and the impact on historic landscape character. [Regard should be had to the statutory duty to preserve or enhance the character and appearance of Heritage assets \(should be conserved and enhanced\) including \(. Regard should be had to\)](#) the character of the former Castle Rising



Chase and deer park including the higher ground in the north and east and the open landscape straddling Grimstone Road.

Sustainable Drainage Systems (SUDS)

E.4.24 An appropriate SUDS scheme should be designed for the site, recognising that surface water discharges to the Black Drain to the south.

Affordable and Special Needs Housing

E.4.25 Affordable housing provision would be required at the current Council standard for the Kings Lynn urban (rural) areas.

Minerals

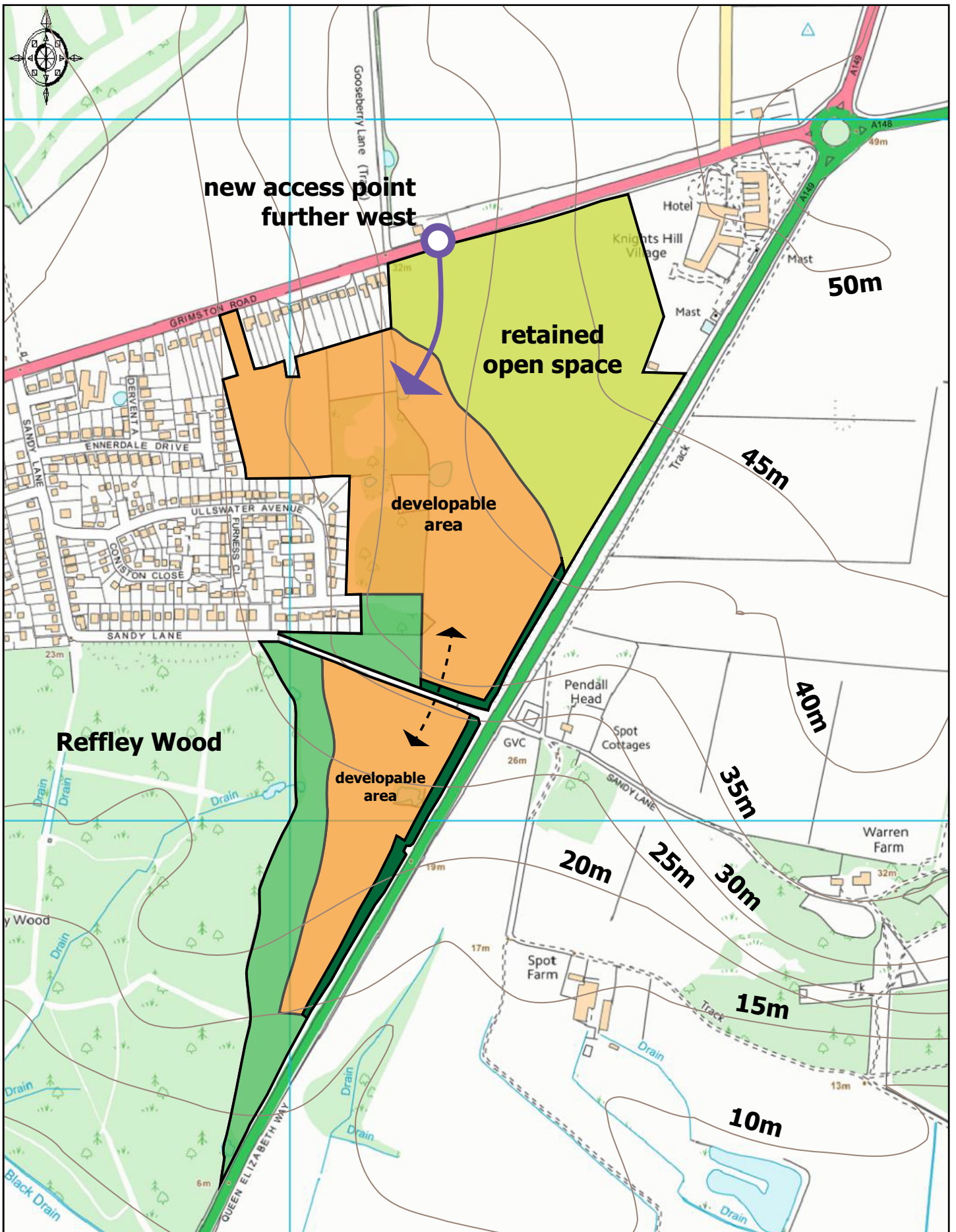
E.4.26 Silica sand is thought to underlay the site. The Policy requires appropriate consideration to be given to this issue prior to planning consent being sought.”

I would be happy to discuss at your convenience in order to seek agreement.

It would also be helpful if you could indicate when we might be sent what is proposed in detail to address the issues raised in the Hearing. I am conscious that we have a limited outline of the strategy you are proposing which while it sounds generally positive, we would obviously be grateful for sight and perhaps input to the details.

Yours Sincerely,

Steven Fidgett
Head of Planning (UK)
For and on behalf of WYG



No dimensions are to be scaled from this drawing.

project: Knights Hill, King's Lynn
 client: Lord Howard of Rising and the Castle Rising Estate
 drawing: Masterplan
 job no: APO4794

drawing no: 1
 drawing by: MH
 checked by: CS
 scale: not to scale



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