

King's Lynn & West Norfolk B.C.

Examination of Site Allocations & Development Management Policies

**ISSUE 7**

**HEARING : 9 July pm**

**Policy E 4 ; Objections 217 and 226**

### **Knights' Hill**

1. My interest in stating objection to this site, and persisting in appearing to discuss it during the Core Strategy and these Hearings, is on my own account as a planner resident on this side of the town and out of profound professional concern at this choice and the environmental damage and community consequences of what is proposed. This Policy for a 600 houses proposed allocation is not "sound" on the basis of site information, is not "justified" as to its number of houses, and is not "effective" as a development control policy, to be a Masterplan brief.
2. This large Growth Area triangle lies across land in two parish councils (Castle Rising, and South Wootton) and in the farthest point of the King's Lynn unparished urban wards. It happens to lay inside the A148/A149 Principal roads, and it happens not to have been directly included in the 1967 Norfolk Coast AONB designation across the road to the north, or in the several natural environment designations across the road to the east. A hotel complex (based on the former farm) stands outside the north-east point of the land. Half of the remaining boundary to the west is with Reffley Wood, a County Wildlife site and Woodland Trust ownership, leaving just about 350 metres where development on the open top of the hill would be in sight of other houses on Grimston Road or Ullswater Drive. The site is immediately adjacent to the highest land in this locality and for 5 miles around.
3. In my Objection 217 I have commented on the LPA stretching the sense of the words actually used in the Core Strategy Inspector's report, and that this should be corrected. At the Core Strategy Examination in 2011 Mr Gomm for the Borough Council absolutely refused to deal with any site-specific detail which might compromise the site policy, and the Inspector accepted the Growth Area since no comparable-sized alternative site was put forward. The site in fact divides into two rather different areas, although the submitted Policy E4 fails to elucidate that. The eastern land is mostly open and exposed, whereas the lower area is surrounded by other houses on three sides, including boundary trees, but includes an area of bracken and scrub heathland at the southeast (and highest) corner.
4. In the past four years there has been no public information to alter the concern of any objector. The LPA has written paragraph E.4.13, but the absence of public information gives everyone else no confidence. No community consultation has taken place, and this proposal is simply forced onwards through the fairly remote strategic procedures. I happen to know that the two developers' agents have been to talk with South Wootton parish council, as the most active body in criticising the development target housing numbers used by the LPA. But in my Objection I have characterised this

18 months period as the main landowner/developer maintaining secrecy about all technical information in the hope that no-one awkward need know. It is inconceivable that the LPA presses forward this very large site on the basis of a single main entry point to be taken from somewhere on the steepest part of the hill along this section of A148 Grimston Road; but they either cannot or will not tell the public anything. By contrast, the 2013 draft Policy included the provision of a cyclepath/footbridge over the A149 (Queen Elizabeth Way) to make usable the existing public path along Sandy Lane onto Roydon Common and Grimston Warren to the east, a single item of public benefit to a wide area; in the submitted Plan it has been dropped, without comment.

5. In my previous comments on this Policy wording I have been critical of its weaknesses to function as a Development Brief, for the benefit of the developers or anyone else. In my comments in 2013 I re-wrote the 'policy' as a development brief, and some of these elements have been included now. I think there is a need for the issues in the two different landscape character areas to be collated separately, and my comments are principally about the open land across the top of the hill.

The Policy has identified 5 main issues "likely to affect the extent and design of the development".

(i) Flood risk – as the land is amongst the highest AOD in the Kings Lynn area, in practice this refers to Environment Agency interest in surface water drainage, from land without streams or drainage at present, and with a care for the water quality and natural environment of the Gaywood valley to the south (which features in the Green Infrastructure elements of the Development Plan);

(ii) ecology, including a mandatory buffer along the edge of Reffley Wood : I believe some surveys and assessment have been done, but it is not in the public domain;

(iii) landscape assessment – it is clear the LPA has sold this pass already, and now needs to ask how visible will the development be? – how far up the site to the hotel boundary and the skyline, what height limit on structures, what specific landscaping can mitigate the impact on the skyline from the east or north? The likely impact is undervalued ["to provide a degree of screening..."] and the means of mitigation are glossed over and are not expressed as mandatory requirements. If this land is to be developed, there should be no buildings visible at the skylines when seen from the countryside out to the east, and this could be achieved by identifying a contour height as the limit for all building construction – I suggested 42.0m AOD;

(iv) minerals – what is the practical response to the peculiar claims of the County Minerals policy that the site should justify why it is not dug out first for glass sands, even though not a designated site and far too sensitive a location near wildlife and existing housing for any such permission? The existing Sibelco ownership at Leziate is extensive with all the established heavy infrastructure and plant required. Has the LPA really not resolved that issue?

(v) heritage – it is clear that the LPA did not think about this issue when seizing on this site, and then stipulating that development at the northern end should be more dense (because it is nearer to the current bus routes?); in this submitted Plan the landscape planting comments have been extended to mention protection of heritage assets. A higher density / urban character to the north will be more able to interrupt the view from Rising Castle. To the south, the southern quarter of the site is relatively dominant and open to view from the ruins of Bawsey (St James' – marked on OS sheets as

St Mary's) church, one of the most archaeologically significant sites on the edge of Lynn. Para.E.4.23 also suddenly mentions Rising Chase as a heritage landscape issue for "regard".

6. There are further issues which are still not expressed or not well considered.

(vi) Traffic noise. The upper site is considerably impacted by traffic noise on the A149 bypass. There need to be surveys of the sound levels, in various weather conditions to identify periods of time that the site at present cannot meet WHO standards for residential development, and the layout and design needs to be influenced by this information.

(vii) Community facilities. A number of services and facilities are mentioned, but the degree of liaison with service providers is lacking information. A community hall seems essential if there were to be 600 homes, but those facilities and any sports provision need to be a coherent part of what is on offer for all of South Wootton parish (in particular). A doctor's surgery is mentioned twice – when what is likely to be needed is a financial contribution towards a health centre for the South & North Wootton (and north Gaywood) areas. This needs a much more central location in the parish than anything Knights' Hill could propose, and the LPA reference to "a doctor's surgery" is a completely outdated and inappropriate mode of provision.

(viii) Habitat Protection measures. This wording appears in many of the Policy lists for Allocated sites, and in practical terms it seems that the nature conservation bodies and societies have argued the need for mitigation packages – meaning 'community chest' general financial contributions – for their work in the Borough. Since October 2013 nothing has been published and no amplifying comment has been obtainable from the LPA. On the one hand there has been concern expressed about the pressure of public access to designated sites, but the mitigation measures include items to make their areas of countryside more accessible. The lack of openness and community engagement on these ideas is lamentable.

7. South Wootton parish council has raised the same issues, and has been unable to obtain any justification from the LPA for this land to have a target for 600 homes; it has particularly surveyed and made representations about traffic implications. The parish council is trying to provide a sensible design framework through its draft Neighbourhood Plan, but most of the land is outside the parish. The opening statement of the Policy E.4, that "the substantial majority of the land" shall be for residential development, seems to be distinctly premature considering the extent of detailed investigations that are still required. If the landscaping, heritage and noise implications are fully assessed and taken into account, then the developable area must be noticeably reduced.

8. The proposal to allocate so much housing development at the top of Knights' Hill has emerged with inevitability from the manner of the LPA's strategic processes. The Council adopted a strategy for King's Lynn as a regional growth point, 10 years ago; it sought large development areas to achieve this, but did not have any social and design strategy that might create either new 'villages' or ensure integration with the existing urban area. The overarching development strategies were confirmed in the 2011 Core Strategy – including this site, which was treated as available 'white' land unconstrained by the designations all round it.

9. Until 2012 the Borough-wide site search avoided all category 2 and 3 flood areas, and had set aside the potential in the 1998 Local Plan for a large housing area allocated at White House Farm, King's Lynn, which was land **west of the A10 West Winch Road**, south of Hardwick roundabout and across to the railway line. This had forced the land search at King's Lynn inland and uphill, whereas by contrast the reaction in recognising 'community needs' as published in the 2013 consultation plan has allowed for a number of housing allocations elsewhere with flood mitigation strategies. I suggest it is hard to avoid the conclusion that by 2009, and as published at the end of 2011, the Council was rushing forward with large sites such as this before any serious investigation of the individual site development constraints had been considered. However, the demands of the Environment Agency in relation to flood risks were only challenged and reviewed after the Core Strategy in 2010-11, when White House Farm King's Lynn could have been the alternative to the housing numbers now thrust onto Knights' Hill. I want to emphasise that I have no problem with the development of the lower part of the 'Knights' Hill land – which is perhaps 20% of the whole housing target here, but I consider that housing development of this scale and beyond the shallow bowl of land in the northern part of the open fields will in future be seen as a devastating mistake.

10. I set out at the start why I think the current text about this land is not Sound as part of a planning implementation document. The Growth Area of the Core Strategy was confirmed in 2011. There were and are alternatives, such as achieving a combined total from several smaller sites or from the White House Farm King's Lynn land rejected before the flood risk issue came to be scrutinised more thoughtfully. But the text and Policy for Knights' Hill should not be making assumptions that "the substantial majority of the land" will be developed when there is such a long list of unknowns. If we are to find that the developer arrives at this Examination with a mass of detail to get confirmation from the Inspector alone, then that will have been an abuse of process.

My participation is to press for Main Modifications in what is going on here. I want the constraints of this site, and the importance of factors which have been undervalued or still omitted, to be fully written into the Masterplan, with no commitment as to the area or the number of homes possible. The technical information should be used honestly to set the scale and layout for a development that does not damage the environment, that creates a place worth living in, and that fits into the character of this part of the King's Lynn periphery. And there should be a commitment to significant community engagement, to create a place that is integrated with the existing in every way.

19.06.15