

# Examination of Kings Lynn and West Norfolk Local Plan – Site Allocations and Development Management Policies

Hearing Statement lodged in respect of **Issue 3**: The Broad Distribution of Housing

Statement submitted on behalf of Camland Developments (563)

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## 1.0 INTRODUCTION

- 1.1 Issue 3 consists of three questions. Questions 3.1 and 3.2 relate to whether the SADMP reflects the housing requirements of the Adopted Core Strategy and whether the broad distribution of growth is justified. Camland's position in respect of these two matters is set out within the earlier representations to the Pre Submission SADMP lodged in February. Camland's on-going concern in respect of the implementation of the Core Strategy and the proposed justification for the distribution of growth relates to the overall reliance that is being placed on sites within high flood risk areas whilst growth at unconstrained sites such as that at Knights Hill (policy area E4.1) are being suppressed. Camland Developments has reiterated its position on these matters within the Hearing Statement lodged in relation to Issue 2. This statement therefore focuses on question 3.3 and the concerns Camland Developments have in respect of the density targets set out within the SADMP.
- 1.2 The earlier representation, lodged in February 2015 in respect of the Pre Submission SADMP, sets out the significant concerns Camland Developments have in respect of the proposed density target of just 16dph and the overall housing target of 600 dwellings that is being imposed in relation to development at Knights Hill (Policy E4.1). While these concerns are not repeated here, it is noted that the Inspector has requested comments on the Council's methodology for calculating the density target.
- 1.3 As previously advised, the density target of 16dph that is being applied to Knights Hill would appear to have come from a simple calculation that followed the overall site area of this expansion site being corrected to accurately read 36.9ha. When the error that had occurred in respect of the overall site area calculation was flagged in our previous representation, it was expected that the Council's then density target of around 24dph would remain but the overall unit target would rise from the 600 dwelling figure. This did not however occur and instead the development target of 600 dwellings was divided by the revised site area to produce the general density target of 16dph. No reasoned justification has since been given. The effect is that the efficient and effective use of the land at Knight's Hill will not be able to be made if these restrictions remain. Such an approach would be unsound.
- 1.4 Camland Developments have been very open to the fact that there is a need for the provision of on-site mitigation areas on the Knight's Hill site. As a result, the gross density of development across the allocation area will not be as high as it might otherwise have been. The quoted density target of 16dph and an overall yield of around 600 dwellings on this site are however considered to be too low. They are not adequately justified and while Camland Developments clearly support the allocation at Knight's Hill, these current restrictions are considered to be in conflict with the NPPF and the Adopted Core Strategy. Amendments are therefore still considered necessary.

## 2.0 POLICY CONTEXT

- 2.1 As covered within the earlier representation, the NPPF requires the efficient and effective use of land to be made (paragraph 58). This is supported by policy CS08 of the Adopted Core Strategy which requires developments to optimise a sites potential. The proposed density of 16dph that leads to an overall housing target of just 600 dwellings fails to achieve either policy requirement.

## 3.0 CONTEXT

- 3.1 We have, in our previous representations, already reviewed the site's context and have shown through the use of a context density plan (Appendix 4 of the Representation) that the character of the site, and that of its context does not support the adoption of a site wide density target of just 16 dph.
- 3.2 In light of the above, and to further assist the Inspector, we set out below why there are no other site specific factors that require a overall density of just 16dph and a housing target of just 600 dwellings to be adopted on this site.

## 4.0 SITE SPECIFIC FACTORS

- 4.1 Since lodging the earlier representation in February, the daft masterplan for the site has further evolved. This is a masterplan that relates to all but one of the parcels of land that forms the draft location at Knight's Hill and is been brought forward by both Camland Developments and Ashdale. A copy of the draft masterplan is provided within **Appendix 1**. The masterplan is being progressed to support an outline planning application that is due to be formally submitted later this year. While the masterplan is not yet fixed (and is still to be the subject of public consultation) it is currently showing a development yield of 648 dwellings across the 34.5ha site. The gross development density of the masterplan area is therefore 19dph. As is required by the Policy E4.1, the density does however vary across the site with lower density development (16dph) located to the west to blend in with the existing built form, and higher development densities (23dph) to the north. While the gross density figure is not significantly different to that set out with Policy E4.1, when taken across the allocation area as a whole, the total development yield rises to circa 700 dwellings (36.9x19).
- 4.2 While Camland Developments do not have control over how many dwellings will be promoted on the final 2 hectare parcel of land that forms the remainder of the allocation area, an overall density of 19 dph for the Knights Hill site as a whole site is considered to be deliverable for the following reasons:

*Ecology*

- 4.3 As advised within our previous representations, the site has been the subject of extensive ecological site investigations. All four common reptiles were found to be present on site. A robust ecology mitigation package has therefore been embedded with the masterplan. Circa 4.7ha of landscape and ecological mitigation land is included within the masterplan and the designation of both dual use areas and safeguarded “ecology areas” around the perimeter of the site ensures that the existing species present on site can be protected during the construction and operational phases of the development.
- 4.4 The impact of the development on important habitat areas located off site is discussed within the Hearing Statement lodged in respect of Issue 7. While this is not repeated here, the attached masterplan provides extensive dog walking routes on site, new and improved connections into the adjacent Reffley Wood and links to other public footpaths and routes to help alleviate pressure on sensitive nearby sites.
- 4.5 There are therefore no reasons why the density of development at Knights Hill needs to be limited to just 16dph on the grounds of ecology and the biodiversity value of the local area.

*Drainage*

- 4.6 A site wide drainage strategy has been prepared. This is based on ground condition surveys and soakage tests that have been undertaken on site. These surveys show good soakage potential across the site. There is as a result good potential to utilise Sustainable Urban Drainage Measures. In those parts of the site that have reduced soakage capacity, surface water will be channelled to ponds and swales elsewhere on the site where infiltration does occur.
- 4.7 In light of the above, the drainage strategy includes a combination of ditches, swales and attenuation ponds. The attached masterplan includes a network of such features that have been sized to cater for a development of circa 650 dwellings on the identified area alone. These will ensure greenfield runoff rates are not exceeded. There are as a result, no specific reasons why a gross density of just 16dph is required in relation to drainage.

*Utilities*

- 4.8 A utilities assessment has been undertaken for the site which has assessed the existing services and infrastructure within the locality, and the capacity to cater for future development at Knight’s Hill. Responses have been received from service providers and it has been demonstrated that suitable connections to serve a development of circa 700 dwellings across the entire allocation area can be provided. Foul drainage is to be feed to Sandy Lane. A pumped system with some attenuation for the southern field will be provided. Adequate capacity exists to enable these connections to be made. This has been confirmed by Anglian Water.

*Highways*

- 4.9 Detailed discussions are ongoing with Norfolk County Council. During these discussions the overarching access strategy has been agreed. This includes the creation of a roundabout access off Grimston Road and the use of a secondary access off Ullswater Avenue.
- 4.10 The impact of the development on the wider highway network is also being assessed. A full suite of traffic surveys have been undertaken. These show that many of the local junctions are operating within capacity. There are some that are not and these include the junction of Grimston Road and Wootton Road. The junction of Langley Road and Grimston Road also shows capacity issues with the development traffic included. An initial package of mitigation measures have been prepared to secure, as a minimum, nil detriment on these junctions. These mitigation measures include the use of signalised junctions and the introduction of the MOVA system which helps create capacity within existing signalised junctions through improved flow management. The proposed enhancement of public transport routes is also being progressed with a route into the site, and through the adjacent built up area via Ullswater Avenue being developed. These improvements will help secure a modal shift from the existing and proposed population.
- 4.11 The discussions now being held with the County Council are focusing on whether betterment can be achieved in respect of the surrounding highway network. While this process is on-going, there are no fundamental highway restrictions that would prevent a scheme of 700 dwellings being appropriately mitigated.

*Open Space*

- 4.12 In preparing the masterplan, regard has been given to the emerging policy DM16 of this SADMP. This draft policy sets out the emerging Council standard for the provision of open space. If one assumes an average dwelling population of 2.3 persons, a development of 650 dwellings will generate a population of circa 1,514 people. The emerging standards would require 2.54ha of amenity, outdoor sport and allotments to be provided and 1.09 ha of suitably equipped children's place space.
- 4.13 The attached development schedule plans (**Appendix 2**) confirms that the amount and type of open space to be provided on the site. This is as follows:
- Children's Play space = 0.98ha
  - Outdoor Sports = 0.67ha
  - Allotments/community Orchards = 0.26ha
  - Amenity open space = 3.8ha
- 4.14 In total therefore 5.71ha of open space are being provided. This is in addition to 4.7ha of

landscape and ecology mitigation buffers. The Council's standards are therefore been exceeded by circa 157%. Additional open space does not need to be provided and therefore a further restriction on the density of development or the overall unit numbers is not required.

#### *Reffley Wood Buffers*

- 4.15 The draft allocation for Knights Hill calls for buffers to Reffley Wood of 50m in depth to be provided. We have set out within our earlier representations why buffers of this depth are not required. It is understood that such large buffers are been requested to ensure an appropriate relationship is provided between the built development and the wood. Concerns relate to gardens backing onto the wood, light spillage and adverse impacts on soil conditions and biodiversity habitat. In this instance, the on site buffer to Reffley Wood forms part of the ecological mitigation areas. Public access will therefore be carefully controlled within this buffer with the area left in a natural condition to assist with, amongst other things, basking reptiles. Rear gardens will not back onto or indeed form any part of the buffer. We have therefore advised that the depth of the buffer should have regard to masterplan specific matters including the location and orientation of nearby houses, and the level of public access to adjacent buffer locations. For the purposes of this proving layout, buffers of between 25m and 40m are shown along the full length of the wood. The attached masterplan is considered to successfully demonstrate that the density of the development across the site as a whole does not need to be limited to 16dph to ensure an appropriate relationship with Reffley Wood is provided/maintained. Furthermore, reference to a specific buffer depth should be removed from the policy with the final strategy being left to a masterplan led assessment. The policy should, in our view, simple make reference to the need to provided "appropriate buffers to Reffley Wood"

#### *Heritage Impacts and the Landscape and Visual Impacts*

- 4.16 These are matters that are referred to in detail in the Hearing Statement lodged in respect of Issue 7. To avoid repetition it should be noted that the assessments undertaken have demonstrated that a development of 650 units on the identified area can be suitably mitigated through the provision of on-site landscaping. These mitigation measures will ensure the development neither appears prominent or harmful within the landscape. The need to limit the development density to 16dph is not supported on these grounds either.

## **5.0 CONCLUSION**

- 5.1 No justification has been provided within the SADMP to support the quoted density target of 16dph. It appears that this density target has been achieved by simply dividing a pre-determined development target (600 dwellings) by the site area (37 hectares). A density of 16dph is unusual low and will fail to make the effective or efficient use of the land on this

unconstrained site.

- 5.2 As set out above, there are no site specific reasons why the overall housing numbers need to be limited to “around 600 dwellings”. As a result it is considered that this part of Policy E4.1 is unsound and requires amendment.
- 5.3 We set out within our earlier representations that these soundness issues can be overcome if the density target of “24 dph” that appeared within the Preferred Options edit of this DPD were to be reinstated, and if the overall housing target set within Policy E4.1 were to return to “around 750 units”. Having now looked at the density standards more closely, the detailed work now undertaken demonstrates that the efficient use of land can be achieved if an overall density of 19dph were to be applied. If this gross density target was rolled out across the remainder of the allocation area, the total number of units delivered would increase to around 700 dwellings.
- 5.4 The requested amended, deemed necessary to ensure the development is consistent with national policy, and therefore sound is:
- To increase the density target set out within Policy E.4.1 to “19dph” and to increase the resultant housing target to “around 700 dwellings”.



# Appendix 1

Draft Masterplan

# Appendix 2

## Development Schedule Plan