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

Hearing Statement lodged in respect of **Issue 7**: Knights Hill (E.4)

Statement submitted on behalf of Camland Developments (563)

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1.0 INTRODUCTION

- 1.1 Issue 7 includes 2 topic areas, both of which relate solely to Knight's Hill. I set out below Camland Developments further thoughts on the deliverability and suitability of the site (question 7.1) and comment more specifically on nature conservation and heritage assets (question 7.2).

2.0 QUESTION 7.1 - THE KNIGHTS HILL SITE

- 2.1 The draft allocation for Knights Hill covers a total area of 36.9ha. 29.9ha of this allocation site are controlled by Camland Developments. Camland Developments are also working in partnership with Ashdale who control the adjacent parcel of land measuring 4.6ha in area. A joint masterplan for these combined areas has been prepared on behalf of both parties and it is the intention to submit a joint outline planning application in due course covering the combined Camland and Ashdale land area. A site location plan for this combined area is provided within **Appendix 1** for clarity. The joint masterplan is provided in **Appendix 2**.
- 2.2 The remaining 2 hectares of land that forms the balance of the allocation area is controlled by a third party. While this land is likely to be brought forward separately, discussions have been held and the emerging masterplan for the Camland and Ashdale land will be shared as the scheme progress towards an outline application. Potential connection points into the remaining plot of land are being retained. The separate promotion of this land is therefore being fully catered for.
- 2.3 We have set out within the earlier representations, and I reconfirm here, that the Knights Hill allocation is available. The land controlled by Camland and Ashdale is currently undeveloped greenfield land. On receipt of a planning permission, the development of the site would commence.
- 2.4 The site is also deliverable. A full suite of site investigations have been undertaken. As is set out within the Hearing Statement lodged in respect of Issue 3, the ecological constraints of the site are known and understood. A package of mitigation measures is included within the draft masterplan.
- 2.5 Archaeological investigations have been undertaken on the site in the form of Geophysical surveys and trial trenching. While the County Council has confirmed that some further trenching will be required within the northern corner of the site prior to development commencing, the potential for archaeological remains is understood and does not pose a constraint to the delivery of the development.
- 2.6 Concerns have been raised by some representors in relation to the potential constraint posed by Silca Sand deposits on the site. Detailed discussions have been held with the County Council and a Minerals Assessment was submitted setting out the likelihood of deposits been found on the site and the ability to extract any remains that might exist. In

response, the County Council, acting as Mineral Planning Authority have confirmed that the development at Knights Hill will not result in the unnecessary sterilisation of safeguarded Silca Sand. No constraints on the delivery of the site is therefore posed. I attach a copy of the submission to and responses from the County Council within **Appendix 3**.

- 2.7 We have also set out within the Hearing Statement relating to Issue 3 that a drainage strategy for the site has already been prepared. Connections to services and utilities are known to be deliverable. Finally, the means of accessing the site from Grimston Road and Ullswater Avenue have been agreed in principle with the County Council. Work is ongoing in relation to the scope of highway mitigation works. Through a combination of focussed junction improvements and the enhancement of pedestrian, cycle and public transport infrastructure serving the site, the highway impacts of the development can be mitigated to ensure a severe impact (the NPPF test) does not occur. The Knights Hill Allocation is also therefore deliverable.
- 2.8 While the viability of the site will continue to be assessed, no known viability constraints exist at this time. The masterplan is progressing on the basis that a policy compliant allocation of Affordable Housing will be included. The Heads of Terms for the s106 agreement will be finalised in the coming months. While only initial discussions have been held to date, no unusual or costly improvements have been identified that would question the viability of the allocation as a whole
- 2.9 Finally the Inspector has asked for comments on whether the draft allocation is justified and sustainable. This allocation accords with the direction of growth that is identified within the Adopted Core Strategy. The appropriateness of directing growth to Knights Hill was therefore fully considered during the preparation and examination of the Core Strategy. Reasonable alternatives were considered and the Inspector concluded that the site was “preferable to any alternatives of comparable size/housing capacity”. As set out within our corresponding representation, the Inspector went on to confirm that the three expansion sites on the edge of King’s Lynn are unconstrained. With the majority of other development sites within King’s Lynn being constrained, particularly in relation to flood risk, the proposed allocation at Knight’s Hill is justified.
- 2.10 The allocation can also deliver a highly sustainable development. The site is very well located to King’s Lynn, the most sustainable location for growth with the Borough. The site enjoys good connections for pedestrians, cyclists and by public transport. The location is already well served by employment sites and services and a development of this scale will be able to add to these. A complex network of greenspaces are also to be delivered with the development’s full requirement for open space being catered for onsite.

3.0 QUESTION 7.2 – NATURE CONSERVATION

- 3.1 As we have set out in the Hearing Statement for Issue 3, a comprehensive suite of on-site biodiversity assessments have been undertaken. The site constraints are known and understood. Appropriate mitigation measures are also included within the draft masterplan.
- 3.2 Careful regard has also been given to the potential impact of the development on sensitive locations off site. Figures 1 and 2 confirm the location of Sites of Special Scientific Interest (SSSI) and Natura 2000 sites within close proximity of the site. As will be noted, Roydon Common is the most proximate. Roydon Common is located circa 1100m to the east (measured in a straight line). Dersingham Bog is located to the north (circa 5000m from the site) and The Wash is circa 6100m to the north west (as measured in a straight line).

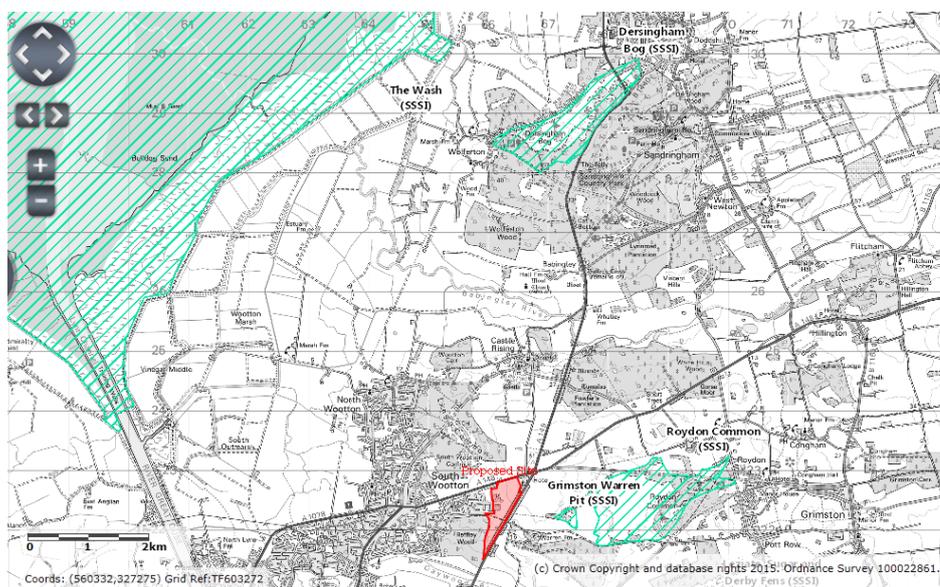


Figure 1 – Sites of Special Scientific Interest within close proximity of Knights Hill Allocation

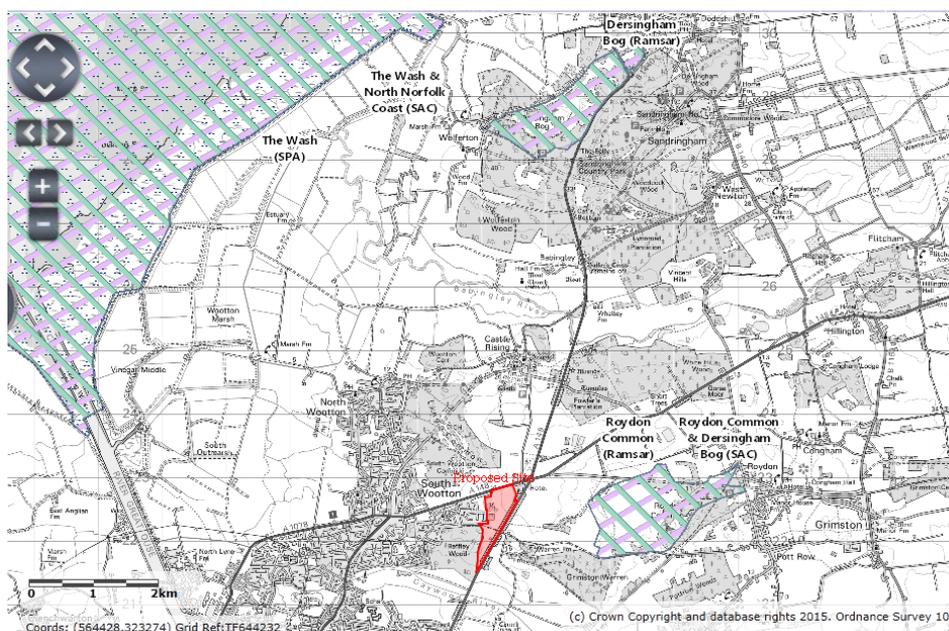


Figure 2 – Nature 2000 sites within close proximity of Knights Hill Allocation

3.3 Camland Development has undertaken discussions with stakeholders on the potential impact of the development at Knights Hill on these sensitive sites. While the potential impact is discussed in some detail within the Council's Habitat Regulations Assessment 2014, Camland's key observations are as follows:

- Roydon Common, whilst located a short distance to the east, is separated from Knight's Hill by the A149. While public footpaths exist on either side of the bypass, given the nature of the road, and the volume of traffic, pedestrian flows across the highway are very low. This is clearly evident by the overgrown nature of public footpath. This is not an attractive route for walkers and no alternative and more accessible route that connects Knights Hill and Roydon and which passes over the bypass exists.
- As is set out within the Council's Habitats Regulation Assessment, the impact of new development on sensitive sites such as Roydon Common are generally considered to be greatest where the site is within comfortable walking distance (see pages 49-51). Given the barrier effect of the A149, this is not the case in this instance.
- Most people visiting Roydon Common, (and Dersingham Bog and The Wash) will therefore travel by car. Research again reported in the Council's Habitats Regulations Assessment advises that most visitors arriving by car live within 8km of the site. Nearly all of King's Lynn falls within an 8km distance of Roydon Common and large areas of the existing built up area also fall within 8km of Dersingham Bog and The Wash.
- The Core Strategy has committed development targets for King's Lynn. In light of the above, the risk posed by increased visitor pressures from Knights Hill are unlikely to be materially different to those posed by other parts of the town and the other planned

locations for growth.

3.4 Notwithstanding the above, careful consideration has and must be given to how the potential impact of increased visitor pressures on nearby sensitive sites can be mitigated. The following measures have been committed to:

- Extensive areas of open space are to be provided on the site. Draft Policy DM16 would require 3.6ha of open space to be provided for a development of 650 dwellings. The attached masterplan provides 5.71ha of open space (excluding the landscape buffer areas).
- These open space areas will include a circular walking route on site of varying distances, the longest on site loop being 2.9km in length.
- Following discussions with the Woodland Trust it has been agreed that direct access from the site into Reffley Wood will be created. This access point will be connected to the on-site footpaths and routes. Direct access to the extensive public routes within the wood and beyond (to the south) will therefore be provided.
- A new car park will be created for visitors of Reffley Wood travelling from further afield. Currently parking availability is very limited and this new resource will make the wood more accessible to existing residents also.

3.5 Future residents of the scheme will be provided with a welcome pack which makes them aware of the sensitivity of nearby sites. It will also provide information relating to the accessibility to alternative routes and footpaths. It is also agreed that a visitor pressure report will be produced to support the future outline application. This will seek to assess the likely visitor pressures created by this development and this will then form the basis of detailed discussions with Natural England to ascertain if any off-site improvements will need to be delivered.

3.6 The mitigation measures set out within Policy E4.1 are therefore noted, understood and agreed with. Through their implementation it is considered that appropriate protection of nearby nature conservation sites can and will be achieved.

4.0 QUESTION 7.2 – HERITAGE ASSETS

4.1 The impact of the development on Heritage Assets was discussed in my earlier representation. It has since the subject of further discussion with both Heritage England and the Borough Council. A Draft Heritage Statement has since been prepared, a copy of which I attached within **Appendix 4**. While this is a lengthy document, a Non-Technical Summary has been included to assist the Inspector. A Landscape Visual Assessment **Appendix 5** has also been produced to assess in more detail some of the viewpoints from

which the development will be visible. The key findings of the Heritage Statement can be summarised as follows:

- Castle Rising and Rising Park is a scheduled Ancient Monument and is a high value asset. The development impact is however considered to be negligible and the significance of effects is considered to be neutral. This is because of the distance shared between the site and the castle, the topography, and the limited inter-visibility between the two.
- The Deer Park is located approximately 500m to the north. The coherence and intelligibility of the remains of the park will not be affected by the development at Knight's Hill. Subject to mitigating planting being provided along Grimston Road, the impact will be reduced to "slight".
- The remains of St James Church and surrounding village are Grade I listed and a Scheduled Ancient Monument. The development will be noticeable but the impact on the asset is found to be minor in magnitude.
- Rising Lodge is Grade II listed. The listed building has been the subject of considerable adaptation and extension. A modern extension sits between it and the site. Views will be exchanged with the northern part of the site. Buffer planting will create a more natural western prospect from the lodge and such mitigation measures would reduce the impact to slight.

4.2 To assist with the consideration of the Heritage Statement, a Landscape and Visual Assessment has been produced. This assessment considers the impact of the development on specific viewpoints, the location of which has been agreed with the Borough Council. Three verified views are also produced to help visualise the impact of the development. This assessment shows that the site is, on the whole, well concealed. Where vantage points are provided, the proposed mitigation planting will ensure the impact is either insignificant or minor adverse. The only viewpoint where long term moderate adverse impacts are recorded is from the section of Sandy Lane that crosses the application site. Visual impacts from this section of the public right of way are unavoidable.

5.0 CONCLUSION

5.1 In light of the above, careful regard has been given to the setting of nearby heritage assets and nature conservation sites. The detailed work undertaken has assessed the significance of each asset and the likely impact of the development. Where mitigation measures are needed these have been set out and responded to within the supporting masterplan. Proper regard has therefore been given to the importance of protecting sites of nature conservation value and the protection and enhancement of heritage assets.

Appendix 1

Red line plan of the combined Camland and Ashdale Land

Appendix 2

Draft Masterplan

Appendix 3

Silica Sand Correspondence

Appendix 4

Draft Heritage Statement

Appendix 5

Landscape and Visual Assessment