



Examination Statement

**Borough Council of King's Lynn & West Norfolk
Site Allocations and Development Management Policies**

22 June 2015



Name of Represontor: South Wootton Parish Council

**Respondent Reference Number: ID: 304170
Hearing Matter: Issue 6: South Wootton (E.3)
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Quality Assurance

Site name: Land at Hall Lane, South Wootton (E.3)

Client name: South Wootton Parish Council

Type of report: Examination Statement

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Signed

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Date 22 June 2015

Reviewed by: John Long BA(Hons) Dip TP MRTPI

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Date 22 June 2015



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Appendix 1 Sustainability Appraisal Representations



1 Introduction

- 1.1 This Examination Hearing Statement has been prepared by Bidwells on behalf of South Wootton Parish Council and is submitted as additional material to address the questions raised by the Inspector in his schedule of Issues and Questions, dated June 2015, specifically concerning the Borough Council's proposed site allocation at Hall Lane, South Wootton (E.3).
- 1.2 This statement relates to representations previously submitted by Bidwells, on behalf of South Wootton Parish Council to the pre-submission, preferred options and earlier stages of the Borough Council of King's Lynn & West Norfolk Site Specific Allocations Development Plan Document (DPD) in respect of the proposed development allocation at Hall Lane, South Wootton.
- 1.3 Through the representations already submitted, South Wootton Parish Council's contention is that the scale of development proposed for allocation in this location lacks a robust and credible evidence base; and therefore, is considered to not be sufficiently justified and questions how effective the allocation will be over the plan period. The Parish Council therefore considers, based upon these tests, that the proposed allocation is unsound. The rest of this statement sets out the reason for this view.
- 1.4 The contents of this Examination Statement should also be read in conjunction with the submissions and technical evidence submitted during earlier stages of the development plan process, notably, those submitted in November 2011, November 2012, October 2013, January 2014, and February 2015.



2 Issue 6: South Wootton (E.3)

Question 6.1 – Is there evidence that any elements of the proposed development in South Wootton (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?

2.1 Throughout the production of this DPD, it has remained the Parish Council's contention that the Borough Council's scale of growth proposed for allocation at Hall Lane, South Wootton, is imprecise and is not justified, sustainable or deliverable, and is not based on a robust and credible evidence base. Whilst the Parish Council acknowledges through its engagement in this process, that the scale of development has been reduced, which we assume is largely in response to the technical evidence the Parish Council have provided, which we trust has been shared with the Inspector. The scale of development which is now proposed is equally not based upon any robust and credible evidence. The Parish Council is not against development, but is concerned that an appropriate and sustainable quantum has yet to be evidenced.

Justified

2.2 Whilst the agents for the owners of the land covered by Policy E3.1 have suggested (as documented in page 274 of the Council's Sustainability Appraisal) that the site could and should accommodate a substantially higher number of dwellings than the 300 proposed. No credible evidence has been submitted to support this position. Based upon the technical evidence submitted by the Parish Council relating to flood risk and transport, the Parish Council firmly contends that the scale of allocation at Hall Lane which can be justified by evidence, whilst being of a density which adequately reflects the character of South Wootton, is no more than 225 dwellings.

2.3 In the absence of any robust and credible evidence to support the Council's allocation of land and quantum of growth at Hall Lane, the Parish Council instructed consultants to assess both the flood risk and transport constraints of this area, which we believe should be strong influences in establishing the justified and sustainable level of growth which can be accommodated in this location. The Parish Council believes that this level of detail is an evidence base which is proportionate and would reasonably expect the Borough Council to have looked into before reaching any judgement on the scale of growth which is considered appropriate and sustainable. It should not be for others to provide this information.

Flood Risk

2.4 The Flood Risk Assessment undertaken on behalf of the Parish Council, submitted to the Borough Council, highlights that the western half and northern tip of the proposed allocation site west of Hall Lane falls within Flood Zone 2 (Medium Risk) with Category 3 (High Risk) immediate to the western boundary.

2.5 Whilst the NPPF allows residential development within Flood Zone 2, the guidance highlights that development within Flood Zone 1 should be considered before development in Flood Zone 2. Given that there are other proposed allocations in Flood Zone 1 with capacity to be increased in size; further development in these locations should be considered before development in Flood Zone 2 as required by the NPPF in a sequential approach. The Parish Council see no evidence that the Borough Council has considered the reasonable alternatives and discounted them with evidence, before concluding that the proposed allocation at Hall Lane is justified.

2.6 In view that over half of the 40ha proposed allocation being pursued by the Borough Council is in high flood risk and not considered to be developable area, the Parish Council is concerned that over allocating land for large areas of greenspace on areas already greenfield and reclaimed marshland could potentially give rise to the Borough Council coming under increasing pressure at the application stage, to increase development densities, consequently having the potential of delivering well in excess the number of dwellings proposed by this allocation, which itself has not been sufficiently justified with evidence.



Transport

- 2.7 A transport appraisal was undertaken on behalf of the Parish Council and submitted as evidence to the Borough Council in November 2012, during the preparation of this plan which assessed the cumulative transport effect of both the Hall Lane and Knights Hill allocations being delivered. This study indicated that key junctions would be operating well in excess of their theoretical capacity, resulting in significant reductions in their performance, whilst at the same time questioning whether the level of mitigation/improvements required can be deliverable and achievable within the constraints of the existing highway network.
- 2.8 Whilst the level of growth in this location has been reduced by the Borough Council, which we assume is in response to the Parish Council's submissions, there is still no evidence or rationale as to whether the revised level of growth proposed can be delivered within the constraints of the local highway network (even with improvements), as the combined level of growth between the two allocations still exceeds the recommendation of the Parish Council's commissioned Transport Appraisal. The Parish Council can see no further evidence by the Borough or Local Highway Authority to support their latest position.
- 2.9 It is our view, in light of this evidence, that the proposed allocation is not currently supported by sufficient, robust evidence to demonstrate deliverability. As the Transport Appraisal demonstrates, there is insufficient certainty as to the capacity of the existing transport infrastructure to satisfactorily accommodate the traffic demand associated with the proposed level of development intended for this allocation site, when considered in combination with the development of Knights Hill (E.4).

Sustainable

- 2.10 The Parish Council contends that it is unsustainable for the Borough Council to consider (as detailed in the 4th bullet on page 274 of the Council's SA) that additional housing potential beyond the allocation size could be considered in future planning applications. The Parish Council would strongly contend that this is supposed to be evidence based, plan led approach to sustainable development, and not one driven by application.
- 2.11 The Parish Council refers the Inspector to the detailed comments made with respect to the Council's evaluation of the sustainability of the proposed allocation and Policy E3.1 in its correspondence dated 27 January 2014, where it appears the Borough Council has not responded to the issues raised in its revisions to the SA for the pre-submission version. The concerns raised focussed on the SA methodology and approach, alongside detailed comments relating to the Borough Council's scoring/weighting to some of the key sustainability indicators including economy, heritage, highways and transport, and the natural environment. A full copy of these representations is contained in **Appendix 1** of this Statement.
- 2.12 Overall, the Parish Council contends that the SA as submitted is fundamentally flawed, as the scoring system to evaluate the sustainability of each allocation appears to be arbitrary and subjective, and does not draw upon evidence to underpin how the sustainability impact score has been arrived at. The SA appears to have been 'manipulated' to retrospectively justify the allocation, and not undertaken objectively to inform decisions or the allocation.
- 2.13 The SA also fails to consider the cumulative, in combination effects of the overall sustainability of the allocation of both Hall Lane and Knights Hill (North East King's Lynn). Given their proximity, and dependence upon shared infrastructure i.e. both require Grimston Road and Edward Benefer Way to access the town, the scale of the two proposed allocations, cumulatively could provide circa 900 dwellings and associated infrastructure. The SA, as submitted, does not evaluate the sustainability of the two areas in combination and whether these will exceed environmental, economic or social capacity to justify the



sustainability of the development proposed. This is particularly important when considering the combined recreational pressures which could be exerted upon the adjacent AONB and, in respect of the Habitat Regulations, upon nearby Roydon Common SAC and Dersingham Bog SPA. Such important considerations should not be postponed until the planning application stage.

- 2.14 Therefore, the Parish Council contends that the scale of growth proposed by policy E3.1 remains inappropriate and would not lead to a sustainable form of development, nor provides the overall positive effect on the environment, as envisaged by the requirements of the SEA Directive.

Deliverable

- 2.15 In the absence of sufficient credible and robust evidence which supports the rationale for, and scale of development proposed by the allocation of policy E3.1, and in view of the evidence which has been prepared and submitted to the Council on behalf of the Parish Council and others questioning the impacts upon transport, flood risk, heritage and the natural environment, it remains the Parish Council's position that the Borough Council has not adequately considered whether these constraints to delivery can be sufficiently addressed to provide confidence that the scale of development proposed, is either deliverable and/or financially viable.

Alternatives

- 2.16 The Parish Council would not wish to suggest any further alternative sites within this area for the scale of development proposed, given the environmental sensitivities identified within this statement and previous representations.
- 2.17 Consequently, it is the Parish Council's contention that if the Borough Council, through the SA process, assessed alternative site options, the scale/extent of development proposed for allocation at Hall Lane, South Wootton should be reduced to a scale (225 dwellings) more reasonable and appropriate for the size of the village and its environmental constraints. This is a figure founded upon technical evidence undertaken on behalf of the Parish Council in the absence of sufficient site specific evidence provided by the Borough Council.
- 2.18 Housing numbers from this proposed allocation can be redistributed to other locations more closely located and associated to the urban area of King's Lynn where capacity exists for larger numbers than have been allocated in the plan, i.e. South East King's Lynn. According to para E.2.5 and E.2.6 of the Site Allocations and Development Management Policies Pre-submission document, this indicates that the Planning Inspector who examined the Council's Core strategy explicitly stated that the expansion area of South East King's Lynn is "*relatively unconstrained by flood risk and infrastructure problems, and relatively easily accessed and serviced*". Para E.2.6 goes on to indicate that, informed by the work of the Prince's Foundation for the Built Environment, which was undertaken with the active involvement of local people, this suggests a total of 3,000 to 3,500 additional dwellings could be accommodated in this location (South East King's Lynn).
- 2.19 The above evidence would suggest that capacity exists in this location to achieve sustainable and deliverable development which is largely unconstrained by environmental constraints. We would, therefore, question why less than 50% of this area's capacity is proposed for allocation, whilst seeking to allocate significant development in other areas adjoining King's Lynn (i.e. Hall Lane and Knights Hill), where the environmental sensitivity/harm has been demonstrated to be significantly more adverse.



2.20 In view of the above, the plan does therefore not represent the best options when considered against the reasonable alternatives.

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

2.21 The Parish Council contends that the Borough Council has not had sufficient regard to the implications of the Minerals Safeguarding Area in considering this allocation for the development now proposed. It is clear that the adopted Norfolk Minerals and Waste Local Plan (adopted Core Strategy September 2011) identifies that the majority of the resources of silica sand within the County are to the east of King's Lynn and, therefore, a high probability that resources could exist and require safeguarding in this location.

2.22 Prior to and following the pre-submission consultation, the County Council continues to request interest in putting forward potential sites for silica sand extraction, as there are currently insufficient sites available in the county to meet the identified target tonnages. The County Council is currently consulting on a "call for sites" for the Single Issue Silica Sand Review of the Norfolk Minerals Site Specific Allocations Plan, which closes on the 30 June 2015. The County Council are inviting any potential specific site allocations for silica sand extraction up to 2026. The silica sand resource in Norfolk occurs entirely within the administrative boundary of the Borough Council of King's Lynn and West Norfolk, which makes any sites exhibiting this resource, either more precious in delivering this finite nationally significant mineral resource.

3 Conclusions

- 3.1 South Wootton Parish Council considers that the scale of development proposed for allocation at Hall Lane is unsound as it remains based upon a lack of credible and robust evidence base, which cannot sufficiently justify the scale of development proposed. The Parish Council considers that the proposed allocation is prematurely submitted for examination. Without robust and credible evidence and investigations required to reasonably and rationally conclude that the proposed allocation is sound, the allocation should not be taken forward.
- 3.2 Through the consultation to date, the Borough Council in response to the representations of the Parish Council and others, have sought to reduce the scale of development, but not provided any further evidence to justify the scale and location of the growth now proposed.
- 3.3 South Wootton Parish Council accepts that the Council has tested the sustainability impacts of allocating the scale of growth in this location, but as detailed within this statement, the Parish Council considers that this assessment process is irrational in its conclusions and considers the assessment to be flawed, misleading and based upon incorrect assumptions (see **Appendix 1**).
- 3.4 In the event that the Inspector is minded to reduce the proposed allocation at Hall Lane to a level (225 dwellings) which has been determined in response to key technical evidence relating to flood risk and transport constraints, the Inspector can be reassured that there is sufficient flexibility within other growth locations within King's Lynn (i.e. South East King's Lynn) to provide any excess units currently proposed for allocation at Hall Lane and redistributed to this growth location. It has already been identified within the Council's submission document (Para E2.5 and E2.6) that an upper capacity exists from the current allocation of 1,600 to 3,000-3,500 dwellings. This capacity for growth has been identified through consultation and engagement with the local community.

Summary: E.3: Land at Hall Lane, South Wootton

What part of the SADMP is unsound	Policy E.3.1, and supporting paras E.3.8, E.3.9, E.3.10, E.3.13.
Which soundness criterion it fails	Positively Prepared, Justified, Effective as detailed in the Parish Council's publication stage representation form.
Why it fails	Refer to publication stage representations. In the absence of any credible or robust evidence provided by either the Borough Council or the agents/landowners of this site which justifies the scale of allocation proposed, the Parish Council, using its own commissioned evidence base, which has been used to reach the proposed level of growth now suggested by the Parish Council.
How the SADMP can be made sound with precise change/wording sought	Main changes sought to Policy E.3.1 and for consistency, amendments to supporting para E.3.8 – E.3.13 as follows: (Also documented in the Parish Council's publication stage representation form) Policy E.3.1 "Land at South Wootton of approximately 40ha 20ha , as shown on the proposed Policies Map, is allocated for a high quality, well landscaped development of 300 no more than 225 dwellings and associated facilities....." A(ii) should relate back to the Core Strategy where it should be confirmed that the site allocation at Hall Lane, as it will be delivering part of the growth to King's Lynn, should be providing 15% affordable housing and not the 20% expected in other rural areas outside of King's Lynn.



A(iii) reference to a doctor's surgery conflicts with the Parish Council's submitted Neighbourhood Plan.

Correction of factual errors

E(i) – Low Road should be replaced with Edward Benefer Way

2e – Low Road should be replaced with Edward Benefer Way



Appendices



Appendix 1

Sustainability Appraisal Representations



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Dear Mr Gomm

Email and post

**Representations to the Draft Sustainability Appraisal Report
(Revision 1*) for the Detailed Policies and Sites Plan Preferred
Options**

The following representations have been prepared and submitted on behalf of South Wootton Parish Council in response to the Draft Sustainability Appraisal (SA) Report for the Borough Council's Detailed Policies and Sites Plan Preferred Options Document.

These representations should be read in conjunction with the statement of objection, prepared and submitted in October 2013, along with all representations and evidence previously submitted on behalf of the Parish Council in both November 2011 and November 2012.

South Wootton Parish Council continues to strongly object to the scale of the growth allocations proposed for Land West of Hall Lane, South Wootton (SWOOTTON1) and North East of King's Lynn (KNIGHTSHILL).

The proposals contained within the consultation document, and evaluated by the SA process, the Parish Council consider to be an inappropriate scale of development, which cannot be accommodated within the existing infrastructure. At this stage, the Parish Council contend that the plan preparation process, and its accompanying Sustainability Appraisal, of which these representations respond, does not, so far, sufficiently appraise the environmental, economic and social effects of locating this scale of development adjacent to the existing village, nor has the appraisal looked at other reasonable alternative locations where a significant amount of the housing planned for these preferred allocation options could be provided. This work, we believe, would reduce the need for the proposed scale of growth in the sensitive locations adjacent to South Wootton Parish.

SA Methodology & Approach

The Parish Council requests further explanation of how the Site Sustainability Factors have been established, alongside the robustness of the potential links to the Local Plan Sustainability Objectives.

In addition, the site sustainability factor scoring guide, provided in Table 3.4c of the Council's document, appears incomplete. There is not an interpretation of the score for each sustainability impact score under every site sustainability factor. This consequently makes it difficult to challenge a potential re-score, as it is difficult to determine the Borough Council's interpretations.

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The scoring system utilised appears to be arbitrary and subjective in how the sustainability impact score is arrived at, i.e. whether it is positive/negative, and the severity of the score. For these reasons, the Parish Council would draw the Borough Council's attention to the following aspects.

All changes proposed in the following representations utilise the same scoring criteria used by the Borough Council.

Knights Hill

As denoted by the SA documentation, no alternative site locations have been evaluated at this location, therefore, all the following references relate to the proposed allocation for North East King's Lynn (Knights Hill).

Community & Social

The Borough Council's positive score would indicate, with reference to table 3.4c, page 28 of the consultation document, that there is 'overall favourable community support to the proposals'. Certainly from the statement of objection, prepared on behalf of the Parish Council, and after reviewing other comments received from local residents to date, we would contend that this certainly is not the case. Whilst it is acknowledged that further housing could benefit the wider community, the existing Parish would be negatively affected by the proposals, including the potential damaging effects upon community asset. The Parish Council, therefore, questions the community benefit for the Parish to arise from the proposed development.

Heritage

The proposed allocation is bounded by the Norfolk Coast AONB, along the A148 to the north east of Knights Hill, and adjoining the settlement along Grimston Road. Given the topography of the site, which rises to the top of Knights Hill, this will result in prominent development that dominates the adjoining area and being visually prominent in sensitive viewpoints. These include significant views into and out of the AONB, resulting in an urbanised environment and an impression of urban sprawl, further encroaching onto the nationally important landscape of the AONB. This also has a potentially significant impact on the setting of the listed buildings at Knights Hill. The combined effect on these nationally important features is significant and must be adequately addressed in any proposed allocation. At present, neither the extent of the allocation nor the proposed phasing plan pay any regard to these important heritage and landscape assets. Therefore, the Parish Council contends that the scoring should be revised from 'neutral 0' to 'dependent on implementation/negative #/x') until further evidence is provided relating to these concerns, which are of a strategic nature.

Highways and Transport

It is noted that the scoring criteria used under the evaluation of this site sustainability factor is solely based upon the view of the Local Highway Authority. Notwithstanding this, and with reference to the technical Transport Appraisal work provided to the Borough Council in November 2012, this evidence concludes that the 'KNIGHTSHILL' allocation should be reduced by half to ensure that the level of growth proposed can be accommodated within the scope of the existing constraints of the local highway network, allowing for deliverable improvements to adequately mitigate the impacts of the proposed growth.

This transport information has been provided to the Local Highway Authority, who whilst reviewing its contents, has not to date provided any counter evidence. Through subsequent discussions with representatives of the Local Highway Authority, it is assumed by Officers that this detail will be known at the application stage when the transport assessments are prepared. Without credible and robust evidence to justify the delivery of this proposed allocation, and acceptability of the impacts for the purposes of the

SEA/SA process, it is our view that it remains unsound to avoid these issues and defer until the planning application stage. In view of this, the Parish Council contends that the positive score should, at the very least, be reduced to 'positive/negative' as the actual impact has not yet been proven with robust and credible evidence.

Landscape and Amenity

The highest ground lies in the area known as 'Knights' Hill' and reaches just over 50 metres AoD. Here, the upland becomes a quite prominent plateau and, as such, a very important landscape feature. The plateau overlooks both river valleys, the developed areas of Gaywood and King's Lynn, the Woottons, Castle Rising and the lowland mire of Roydon Common. To the west, the Wash can be viewed while, several kilometres to the east, the vista extends via the villages of Congham, Grimston and Gayton, to the chalk escarpment and beyond.

Knights Hill plateau also extends eastwards into the parish of Hillington. Along it runs an important and ancient road, now the A148. This route ran from Lynn crossing the Gaywood River at 'Bishop's Bridge' (mentioned in a late 15th century survey of the lands of the Bishop of Norwich in Gaywood). Both the Wootton and Grimston Roads form part of this route, once known as 'Walsingham Way'.

The Norfolk Coast AONB also adjoins this area. As a nationally important landscape feature, it will be adversely impacted upon by the setting of new development in this location. This includes significant views into and out of the AONB, resulting in an urbanised environment and an impression of urban sprawl further encroaching onto the nationally important landscape of the AONB. The combined effect is significant and must be adequately addressed in any proposed allocation. At present, the extent of neither the allocation nor the proposed phasing plan, pays any regard to these important landscape assets. For these reasons, the Parish Council contends that the score should be revised to Negative, until there is robust/credible evidence available which suggests otherwise.

Natural Environment

It is the view of the Parish Council that the Habitat Regulations Assessment (HRA), which accompanied the previous consultation document, does not adequately address the potential for increased nutrient enrichment of both Dersingham Bog and Roydon Common, from increased dog walking or from the other impacts identified, associated with an increased resident population from this proposed allocation.

This aspect could lead to a cumulative adverse impact upon the integrity of these designated sites, which could impact upon whether this development allocation is capable of being delivered.

Added to this is the issue previously raised by Norfolk County Council in respect to whether there is potential for silica sand deposits to exist within this area. Given the proximity of the existing silica sand extraction at Leziate, further investigation is required to ascertain whether any silica sand resource is available. Given the national significance and policy position for silica sand in the UK, this matter needs addressing before progressing this allocation further. If silica sand reserves are present, then extraction will be required before any development can be consented/commenced, which could severely question the delivery of this allocation during this plan period.

From our review of the evidence provided to support the promotion of this proposed allocation, overall, we contend that the site option has been put forward without sufficient assessment or evaluation of the flora and fauna, which would be affected by the development allocation, both locally and also in combination with the adjacent AONB and adjacent area of Ancient Woodland at Reffley Wood. Both these assets warrant further review, as they are afforded significant protection under the NPPF. Whilst it is acknowledged that the reduction in numbers at this allocation has been largely driven by ecological concerns, we would request further review of this proposed allocation boundary is undertaken to reflect the Parish Council's previous objections and those received to date from both the Norfolk Wildlife Trust and Woodland Trust. Both these

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consultees have raised concerns relating to the buffer zone (200m) required around the existing woodland, as well as the effect increased recreational pressures could be from this development, both directly and indirectly upon Roydon Common SAC and Dersingham Bog SPA which are close to this allocation area.

Therefore, in the absence of current robust and credible evidence, the Parish Council contends that the score should be revised to 'negative'. The negative impact on such indicators cannot be left to how the scheme is implemented, as these effects go beyond the site and cannot be mitigated just through good design. For this reason, and to ensure that the delivery of this allocation will result in a form of sustainable development, further work is required to provide evidence related to heritage, Highways, Landscape, and the natural environment (inc ecology) before improved scoring can be provided.

Parish Council Revised Scoring for Proposed Knights Hill Allocation (Highlighted cells show variance in scores)

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Env	Infrastructure, Pollution & Waste
Borough Council's Scoring	+	+	0	0	+	0	+	#	#	#
SWPC Scoring	+	X	0	0	+	#/x	?/x	X	X	?

Land at Hall Lane, South Wootton (SWOOTTON1)

The following comments relate to the evaluation of the Council's preferred option SWOOTTON1, as related to the Parish Council's objections against this preferred allocation to date. The Parish Council do not wish to make any further comments in respect to the alternative site options, only insofar as the following comments.

Sites 446/817 & 818

It is noted that the overriding reason for rejection of the above sites is that it constitutes development within the AONB, of which *'benefits from the highest degree of landscape protection under the NPPF and a presumption against major development'*. The Parish Council would suggest a similar rationale should be afforded in the case of the proposed Knights Hill allocation, given its elevated sensitive plateau location, adjacent to the AONB and ancient woodland, both of which will be adversely affected by the development of the growth envisaged in this location.

Site 1152

Reference is made to the site being *'insufficient size by itself to accommodate the scale of housing growth sought by the Core Strategy'*. The Parish Council wishes to reiterate previous comments made throughout this process, that the Core Strategy, whilst identified a strategic direction for growth in the Woottons, and an overall figure of how many dwellings needed to be accommodated within each tier of the settlement hierarchy, did not propose specific sites or, indeed, did not identify specific numbers of dwellings to each settlement. Therefore, the Parish Council contends that this statement is factually and technically incorrect.

Economy A Business

The Borough Council's scoring, under this site sustainability factor, would, by its own scoring guide, suggest that the overall contribution to the economy, jobs and business opportunity is positive from this development. The Parish Council would contend that the allocation at SWOOTTON1, as proposed, would deliver minimal/no real benefit to the long term status of the local economy, and therefore should be revised in its scoring to 'Neutral'.

Heritage

The Borough Council's scoring, under this site sustainability factor, would, by its own scoring guide, indicate that the impact from the proposed allocation upon Heritage assets is currently unknown. The Parish Council contends that, based upon the representations submitted in November 2011, which included some archaeological evidence, the scoring should be reduced to negative. According to archaeological investigations of the area in the late 1960s, there is evidence which indicates that a 16th Century Fort/Sconce has been identified west of Hall Lane, which will require further geophysical surveys and potential trial trenching before the full significance of this site can be determined. For these reasons, there would be some minor degradation of heritage.

Highways & Transport

It is acknowledged that the Borough Council's scoring for this aspect suggests that 'the allocation will deliver better transport links for the community' and whilst in part, the Parish Council agrees that the development allocation would enable an alternative access route to be delivered eliminating the need to access the existing school facilities from Hall Lane. Notwithstanding this, the Parish Council contends that insufficient evidence has been provided by the Local Highway Authority to indicate that the proposed scale of growth envisaged at SWOOTTON1 is sustainable in terms of highways and transport, adequately demonstrating that the highway network and the confines of what additional capacity can be created, is adequate to mitigate the impacts of the proposed development.

Natural Environment

From evidence provided by local residents, confirmed by the Norfolk Bird Atlas and submitted to the Borough Council in November 2011, the proposed site (ref TF629) contains forty breeding species and thirty two wintering species (some being endangered). Before further consideration of this site option is given through the preparation of the Site Allocations and Policies DPD process, a more detailed examination is required to determine the significance of ecological assets in the vicinity and whether these will be adversely affected by the proposed development. If this is found to be the case, this additional information should inform the Borough Council's Sustainability Appraisal and Appropriate Assessment processes. In the absence of this evidence, the Parish Council contends that a precautionary approach should be taken and rather than being considered uncertain, based upon the limited information which is available, the impact should be considered negative until further ecological information is available.

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Parish Council Revised Scoring for Proposed SWOOTTON1 Allocation (Highlighted cells show variance in scores)

Site Ref	Site Sustainability Factor									
	Access to Services	Community & Social	Economy A Business	Economy B Food Production	Flood Risk	Heritage	Highways & Transport	Landscape & Amenity	Natural Env	Infrastructure, Pollution & Waste
Borough Council's Scoring	+	+/x	+	X	+/x	?	++	+/x	?	0
SWPC Scoring	+	+/x	0	x	+/x	X	+/-	+/x	X	0

Conclusions

The Parish Council does not contend that the Sustainability Appraisal, undertaken by the Borough Council, enables the Local Planning Authority, or its consultees, to arrive at the conclusion that the Site Specific policies, as currently drafted, will not have an overall positive effect on the environment.

The SA, as currently drafted, fails insofar as it does not consider the cumulative, in-combination environmental effects of the overall sustainability of the preferred development allocations. For example, what are the in-combination direct and indirect environmental effects to arise from the preferred allocation of Land North East of King's Lynn in combination with the allocation at SWOOTTON1? Cumulatively, these two proposed allocations will, at this stage, propose 900 dwellings and associated infrastructure, but the SA does not evaluate the sustainability of the two areas in combination and whether these will exceed environmental, economic or social capacity to justify the sustainability of the development proposed.

For the reasons identified in these and other representations submitted on behalf of the Parish Council, the Parish Council contends that the preferred options, as currently envisaged for Land West of Hall Lane and North East King's Lynn, remain inappropriate in scale and would not lead to a sustainable form of development, nor provide the overall positive effect on the environment, as envisaged by the requirements of the Directive.

We trust that the above representations will be considered by the Borough Council in the next iteration of the Sustainability Appraisal and that these representations will be read in conjunction with previous representations submitted in connection with the site allocations document on behalf of the Parish Council.

Yours sincerely

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