



Examination Statement

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

22 June 2015



Name of Representor: South Wootton Parish Council

Respondent Reference Number: ID: 304170

Hearing Matter: Issue 7: Knights Hill (E.4)

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Quality Assurance

Site name: Land at Knights Hill (North East King's Lynn) (E.4)

Client name: South Wootton Parish Council

Type of report: Examination Statement

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Signed

Date 22 June 2015

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Date 22 June 2015



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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 Knights Hill, (North East King's Lynn E.4).
- 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 Allocations and Development Management Document in respect of the proposed development allocation at Knights Hill (North East King's Lynn).
- 1.3 Through the representations already submitted, South Wootton Parish Council contends 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 positively prepared, sufficiently justified, effective or sustainable, and is therefore considered 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 7: Knights Hill (E.4)

Question 7.1 – Is there evidence that any elements of the proposed development at Knights Hill (E4.1) 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?

Justified

- 2.1 The proposed allocation has not been justified with an evidence base that is either sound, complete or by any objective assessment of the relevant constraints. The Plan, as submitted, is not supported by robust evidence. It cannot be confirmed that the allocation of land at Knights Hill would not give rise to significant adverse impacts on the local transport network, important heritage, landscape and nature conservation assets. Therefore, the Parish Council contends that there is insufficient evidence to rationally conclude that this policy approach is sufficiently justified.

Landscape

- 2.2 The issue of the proposed allocation's impact on Castle Rising and the associated Deer Park/Hunting Chase does not appear to have been adequately considered. This is a nationally significant constraint affecting both the Castle and its historic landscape setting. There is no robust evidence to condemn whether the allocation would have an adverse impact on this nationally designated feature.

Heritage/Ancient Woodland

- 2.3 In this case, the setting of Castle Rising and the listed buildings at Knights Hill (formerly Rising Lodge) includes the higher ground and essentially rural context of the area around Knights Hill and the views down to Reffley Wood.
- 2.4 English Heritage (now Historic England) have raised serious concerns through representation at the pre-submission consultation, to the effect the Knights Hill allocation as submitted, could have upon the historic landscape, which the Parish Council and others consider are issues which have not received adequate consideration or robust assessment.
- 2.5 The cluster of listed buildings at Knights Hill are also some of the most significant in the area and their immediate context includes the rising ground towards the east along Grimston Road and extends down to meet Reffley Wood. The heritage issues this raises require consideration under the terms of the NPPF, together with that of the listed buildings at Knights Hill itself.
- 2.6 It is suggested that once all the environmental constraints are taken into account, including the latest from the Woodland Trust requesting a 100m buffer around Reffley Wood, the size of the proposed allocation is significantly compromised to the extent that it is reasonable to question whether at such a reduced scale the allocation remains viable and will be effective in its delivery of housing during the plan period.

Sustainable

- 2.7 The Council's 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, but 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.

Alternatives

- 2.8 The Parish Council would not wish to suggest any further alternative sites within this area at the scale of development proposed, given the environmental sensitivities identified within this statement and previous representations.
- 2.9 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 Knights Hill (North East King's Lynn) should be reduced, based upon the transport evidence undertaken on behalf of the Parish Council, to a scale of no more than 475 dwellings. If assessment of the heritage and ecological impacts of the proposed allocation were investigated in more detail in response to the concerns raised by English Heritage and the Woodlands Trust, the Parish Council expects the capacity of the land to accommodate housing would reduce further.
- 2.10 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, and are not as constrained by landscape/heritage impacts. 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 was *"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, suggesting a total of 3,000 to 3,500 additional dwellings could be accommodated in South East King's Lynn.
- 2.11 This evidence would suggest that capacity exists in this location to achieve sustainable and deliverable development which is largely unconstrained by environmental constraints. The Parish Council 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 where the environmental sensitivity/harm will be significantly more adverse.
- 2.12 The plan does not therefore currently propose the best option when considered against the reasonable alternatives.



Question 7.2 – Has proper regard been given to the protection of sites of nature conservation importance and to the protection and enhancement of heritage assets?

- 2.13 The approach to the protection of sites of nature conservation does not appear either robust or consistent with the relevant Regulations. There is no clear strategy in relation to the provision of appropriate recreation space for the proposed allocation that would reduce the recreational pressure on existing designated nature conservation sites in a manner and quantum which ensures that there is no adverse impact on nature conservation assets at an international, national or local level. In the case of Knights Hill, this includes the potential impact on ancient woodlands, including Reffley Wood and surrounding land whereby the Woodland Trust has responded indicating that the woodland buffer around the ancient woodland of Reffley Wood should be increased to 100m, not the 50m as proposed.
- 2.14 There is no justifiable evidence to suggest that the allocation can overcome the increased visitor pressure that would result, particularly cumulative impacts that should be considered at the Local Plan level, and accommodating the concerns raised by English Heritage and the setting of heritage assets.



3 Conclusions

- 3.1 South Wootton Parish Council considers that the scale of development proposed for allocation at North East King's Lynn (Knights Hill) is unsound as it remains based upon a lack of credible and robust evidence base, which cannot sufficiently justify the scale of development proposed. It is submitted for examination prematurely and without the further evidence gathering and investigations required to reasonably and rationally conclude that the proposed allocation is sound. Based upon the lack of credible evidence provided to date, and the imprecise scale of development proposed, without any evidence supporting such suggestions, the Parish Council questions how the Inspector can rationally conclude, when faced with such scarce detail relating to heritage, the natural environment and cumulative impacts, whether the allocation as proposed is justified, sustainable, deliverable or viable.
- 3.2 Through consultation to date, the Borough Council, in response to representations have sought to reduce the scale of development to that originally proposed, but not provided any further evidence or rationale to justify the scale and location of the growth now proposed, particularly when considering the severity of the potential constraints identified in this statement and previous representations by the Parish Council and other bodies including statutory consultees to ensure the effects, i.e. to the historic landscape, are adequately mitigated.
- 3.3 South Wootton Parish Council accepts that the Council has tested the sustainability impacts of allocating this scale of growth in this location, but as detailed within this statement, the Parish Council contends 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 the Inspector is minded to make the changes proposed, i.e. reduce the housing numbers at Knights Hill and increase them elsewhere, 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 accommodate the displaced numbers. 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. Increasing the number of dwellings allocated in this location would not only relieve the pressures from sensitive locations, such as Knights Hill, but also helps secure the viability and long term sustainability of South East King's Lynn by having the quantum of development necessary to assist in the finance and delivery of the large strategic infrastructure required to deliver a sustainable strategic urban extension to the town.

Summary: E.4: Land at North East King's Lynn (Knights Hill)

What part of the SADMP is unsound	Policy E.4.1, and supporting para E.4.16, E.4.22, E.4.26..
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 the site which justifies the scale of allocation proposed, the Parish Council contends with insufficient evidence, the Borough Council has failed to properly consider issues which could significantly affect the delivery of the allocation, including setting of heritage assets, nature conservation, infrastructure capacity and recreational pressures on the nearby SPA and SAC.



How the SADMP can be made sound with precise change/wording sought

Main changes sought to Policy E.4.1 and for consistency, amendments to supporting para E.4.16, E.4.22, E.4.26 as documented in the Parish Council's publication stage representation form.

South Wootton Parish Council considers that the following changes are required in order to address the concerns raised with regards to the tests of soundness related to site access/highway capacity, landscape/heritage assets, and form/character of development and buffers to ancient woodland.

Site Access/Highway Capacity

South Wootton Parish Council considers that based upon the Transport Appraisal evidence previously provided, the Policy E.4.1 is changed to reduce the number of dwellings proposed from 600 to at least 475 dwellings. Following investigation of the additional matters referred to in this statement, the capacity of the site to accommodate this level of growth may well have to be reduced further.

Heritage & Landscape

Suggest further information is provided in advance of this allocation being progressed which assesses the impact of the proposed allocation upon the listed buildings at Knights Hill, the Scheduled Ancient Monument of Castle Rising Castle, and the setting of this nationally significant heritage asset within its wider, well preserved landscape setting.

Form and Character of Development

Part 2 Change to reflect density of no more than 16 dwellings per hectare in order to reflect the character and development density predominantly found in other parts of the Parish.

Woodland Buffer

Increase the landscape buffer to Reffley Wood to 100 metres, in line with the recommendations of the Woodland Trust.



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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