



**King's Lynn and West Norfolk Local Plan: Site Allocations and  
Development Management Policies**

**Statement to Inspector on behalf of George Goddard Ltd**

**In relation to land in South Wootton to the north of Grimston Road  
and east of the existing development boundary**

**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**

**Tel 01553 674004 Mob 07880728352 e mail [richardhigh5@btinternet.com](mailto:richardhigh5@btinternet.com)**

## **Background**

George Goddard Ltd has previously made representations on the emerging Site Allocations and Development Management Policies Development Plan Document at the Issues and Opportunities stages. The representations have related to the development potential of land in South Wootton to the north of Grimston Road and east of the existing development boundary. A Plan showing the location of the site to which these representations relate is attached as Appendix 1. A copy of the representations made by Adrian Parker Planning at that time is attached as Appendix 2.

George Goddard Ltd has also made representations to South Wootton Parish Council in relation to the proposals in the emerging Neighbourhood Plan.

## **Relevant Questions**

This statement relates to the following questions which have been posed by the Inspector.

1. Is sufficient weight placed on the need to conserve and enhance the natural environment?
2. Is the relationship between the Site Allocations and Development Management Policies and future neighbourhood plans sufficiently clear? Do the policies provide sufficient hooks on which to hang neighbourhood plans?
3. Is the Council's approach towards the definition of settlement boundaries justified and consistent?

Of these questions the most significant is the last question relating to development boundaries as the comments relating to the other questions also relate to this one. The statement is therefore focussed on this issue.

### **Is the Council's Approach to the Definition of Settlement Boundaries justified and consistent?**

It is contended that the Council's approach to the definition of settlement boundaries is not justified. In particular the Site Allocations and Development Policies document does not contain any reasoned justification for the definition of the settlement boundary around South Wootton. It does not provide any flexibility for neighbourhood plans to alter settlement boundaries and therefore provides insufficient flexibility to allow neighbourhood plans to plan positively for the needs of their area.

The justification for Policy DM2 simply states that "Development boundaries are defined for each of the borough's town and main rural settlements". It does not make clear what criteria have been used to define the settlement boundaries. In relation to neighbourhood plans it does not clarify what flexibility is provided, if any, to qualifying bodies to vary settlement boundaries to meet local needs.

Whether the definition of a settlement boundary is regarded as a strategic policy is not made clear, but it is contended that while policy DM2 relating to settlement boundaries may be regarded as strategic, the actual location of a settlement boundary is non-strategic. In this regard the definition of settlement boundaries in areas where neighbourhood plans are being prepared may be regarded as contrary to policy 185 of the National Planning Policy Framework which states

**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**

**Tel 01553 674004 Mob 07880728352 e mail richardhigh5@btinternet.com**

that “Local planning authorities should avoid duplication planning processes for non-strategic policies where a neighbourhood plan is in preparation.”

In this respect in relation to the second question posed by the Inspector, policy DM2 fails to make the relationship between the Site Allocations and Development Management Policies document sufficiently clear. Specifically it does not provide any explicit opportunity for neighbourhood plans to determine settlement boundaries.

The difficulties created by this approach may be illustrated by the emerging South Wootton Neighbourhood Plan.

The plan includes a proposal for a new pedestrian/cycle route across land owned by George Goddard Ltd and outside the settlement boundary. However, it contains no explanation of how the route can be delivered. The plan also refers to the need for new and larger primary health care facilities in South Wootton and the vicinity of Asda as a suitable location. Small scale residential development on the lines of that suggested in Appendix 2 could facilitate the release of land for the proposed cycle track and funding for it. Such development could also provide a site for new primary health care facilities. This is illustrated on the plan at Appendix 1. Development of this scale is not proposed as in any way an alternative to the major allocations proposed in the SADMP document. It would however provide for a small number of houses in a desirable location and at the same time facilitate clear aspirations in the neighbourhood plan which may otherwise not be deliverable.

The final issue identified is the question relating to the protection of the natural environment. The contention here is not that there is inadequate protection of the natural environment, rather that the settlement boundary presents a rigid and unquestioning approach to the concept of any development in the Area of Outstanding Natural Beauty, (AONB). While the land owned by George Goddard Ltd is in the AONB, the area close to the existing built up area cannot be said to be of outstanding landscape quality. It is level grassland and agricultural land bounded on two sides by development. While Paragraph 115 of the NPPF attaches great weight to conserving landscape and scenic beauty in AONBs, the presumption against development in paragraph 116 refers specifically to major developments and does not preclude smaller scale development of the type envisaged here.

## **Conclusion**

On the basis of the representations in this statement it is requested that amendments should be made to policy DM2 of the Site Allocations and Development Management Policies document to:

either:

Extend the settlement boundary of South Wootton to include the area identified for small scale development in the plan in appendix 1

Or

Clearly link the definition of settlement boundaries to the preparation of neighbourhood plans to allow for modifications to settlement boundaries by neighbourhood plans to accommodate development needs identified by neighbourhood plans.

**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**

**Tel 01553 674004 Mob 07880728352 e mail [richardhigh5@btinternet.com](mailto:richardhigh5@btinternet.com)**

**Appendix 1 Drawing showing potential alteration to settlement boundary and locations for residential and healthcare development**



**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**  
**Tel 01553 674004 Mob 07880728352 e mail [richardhigh5@btinternet.com](mailto:richardhigh5@btinternet.com)**

## Appendix 2 Submissions by Adrian Parker Planning at preferred options consultation

### ADRIAN PARKER PLANNING

Adrian G. Parker, MA, MSc, DMS, MRTPI

e-mail : [adrian@parkerplanning.co.uk](mailto:adrian@parkerplanning.co.uk)

#### Detailed Policies & Sites – Preferred Options consultation 2013

### *King's Lynn/Castle Rising/South Wootton*

#### KNIGHTS' HILL

### Alternative means to meet housing targets - Review of Non-Preferred Site Site 446 / 818 Land off Grimston Road (north side)

#### Background

This site 446/818 is listed in the consultation as a Non-Preferred Option, the summary reason being "Site falls within an Area of Outstanding Natural Beauty therefore development would have a greater impact on the character and landscape of the settlement". The assessment of this site in the South Wootton section of the King's Lynn sub-regional growth centre Chapter of the Plan makes this comparison with the land west of Hall Lane, South Wootton. It has not been compared with, and related to, the Knights Hill proposal, with which it is the true comparator in landscape terms.

#### Commentary and assessment of development options

This land is controlled by George Goddard Ltd, with property interests including John Skinner family trusts. Their interest in the land was confirmed in 2011 by the re-submission of a *substantially reduced* site [Sites 446 and 817/818]. This does not seem to have been acknowledged in the assessment published in the current Proposed Options document.

The land is all within the Norfolk Coast AONB as defined in 1967 – the designation line passes through Smith's Cottages to the west. The long-term boundaries for the designated areas in the 1960s tended to focus on roads rather than the features and contours of the landscape, and this land is in the extreme south-west end of the Sandringham-based outlier, a separate section of the main North Coast AONB, as a representative portion of the coastline and heaths on the east side of The Wash.

Locally, these fields [site 818] form their own landscape compartment on the south facing slopes from the woodland that marks South Wootton Common and the skyline edge of Castle Rising land; this ground is dominated by the entirely urban development that has intensified in South Wootton to the west and south of the designated area. The wooded skyline is the natural boundary of AONB, not the field in front and its surroundings. The objectives of AONB designation are to identify and conserve characteristic and high quality landscape. Unlike National Parks, they do not have objectives for public access or for the maintenance of local communities and employment. The central issue is to maintain heightened awareness of the visual impact of any development, and to mitigate this alongside other open countryside objectives to sustain habitats and wildlife. Appropriate development is therefore not ruled out when other planning objectives become significant in the urban fringe.

The planning objective for AONB in a Borough-wide planning study is to have regard to the quality of the landscape. The LPA has already made numerous choices of sites as Preferred Options for development in the villages which are within the AONB – at Burnham Market, Brancaster and Brancaster Staithe, and Thornham. The balance of community issues favoured additional development despite some marked changes being proposed in the local scene.

At Knights' Hill the LPA has been drawn to a site that appears not to have landscape constraints, simply because there are no formal designations. Its single most favourable feature is that it is so high in the landscape that it will not suffer fluvial or tidal flood risk. All else is questionable – more detailed consultation shows it to be ringed by natural environment interests; the ground is high and open enough to risk being a major intrusion in a wide surrounding landscape, and a major source of light on the edge of a dark area; the location is the most peripheral proposal and at greatest distance from the town centre of King's Lynn; the traffic impact locally on the A148 through South Wootton has been the subject of

**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**

**Tel 01553 674004 Mob 07880728352 e mail [richardhigh5@btinternet.com](mailto:richardhigh5@btinternet.com)**

representations not answered by the Highway Authority; every utility and community service has to be extended to the site or community services reinforced elsewhere off-site, since the proposal is not a stand-alone village with its own services. What sort of a 'place' does the LPA think it is establishing, in visual and social terms?

The land north of Grimston Road – site 446/818 – is one of a number of second-choice sites which together can provide an alternative to any scale of development beyond the last dwelling at 180 Grimston Road, now that it is increasingly clear that the upper part of the Knights' Hill site was a decision made too simplistically. The LPA was understandably attracted by a very willing landowner, an absence of flood risk, and the difficulty of placing a large housing target, but the list and likely results of the studies which are required to confirm the practicality of large-scale development makes it a doubtful as well as an undesirable choice.

At Grimston Road, the open arable land on the north side may be divided into three areas.

- 1 The eastern end is higher ground, climbing the hill towards Rising Lodge, and the skyline is reached at the bridlepath through the treebelt by the carstone cottages; this is very thin stony soil;
- 2 Centrally there is a substation and a farm access track – the cockleshell road. West of this access the ground is much more level and includes a main drainage ditch, but the built-up edge of the whole urban area begins abruptly and harshly at this point.
- 3 To the north there is an arable area that forms a re-entrant between woods, reaching to the edge of the golf course, whose grounds extend into the woodland but are generally an open parkland character derived from the natural vegetation of these heaths.

### **Action requested**

It is recommended that full assessment be made of areas 2 and 3 described above for their development potential, on up to 16 ha of land, between the present hard edge opposite ASDA eastward to a point opposite Sandy Lane, and the field to the north surrounded by woods. This area is one of a number of sites that provide better alternative locations for new housing in and around King's Lynn, under every measure of sustainability and Quality of Life, rather than the hill top which is most of the Knights' Hill strategic area.

AGP-03.10.13

**Richard High 96 Nursery Lane South Wootton King's Lynn PE30 3NB**

**Tel 01553 674004 Mob 07880728352 e mail [richardhigh5@btinternet.com](mailto:richardhigh5@btinternet.com)**