

## **Response to Inspector's Note to the Council (9<sup>th</sup> July 2015) - Consideration of a fall-back position in relation to housing delivery.**

### **1. Introduction**

1.1 The Examination into the SADMP adjourned on 7 July and the Inspector outlined a number of issues to which he required responses. In response to the Inspector's note dated 9 July, the Council has considered a 'fall-back' position in respect of planned housing delivery relating to HRA and Flooding Issues. We consider that the approach and detailed changes provide a pragmatic response and display sufficient flexibility in response to the Inspector's questions.

1.2 The Borough Council is seeking to provide certainty about the delivery of mitigation measures in respect of HRA and thus avoid the situation where there is non-delivery of allocations. Equally the Borough Council is demonstrating that it has an agreed position with the Environment Agency (as the overall body responsible for avoiding dangerously located development) to accept development in flood risk areas, but which can be suitably mitigated for by proportionate on-site measures. These issues are both discussed in separate Response Notes.

### **2. Flexibility and deliverability**

2.1 The particular issue here is that the Borough Council has potentially lost some capacity from the allocations in the Plan from Lynnsport and Marsh Lane (193 in total), and in addition doubt has been cast on the delivery of our main allocation at West Winch following the non-inclusion of a site there. The site is identified on the plan at Appendix 3. There is a clear concern that the Plan may not have the capacity to deliver overall numbers if these sites are delayed or lost.

2.2 The proposed Borough Council approach to how the housing delivery can be assured at the level required is made up of the following elements.

### **3. 'Windfall' development**

3.1 Windfall housing is any residential development that is granted consent on land not specifically allocated for residential development in a Local Plan. This source of housing has made a significant contribution to the overall number of completions within the Borough over the plan period to date and will continue to do so. Allowances within the housing trajectory are made for windfall and projected forward. Within the SADMP, up until now, windfall completions have been included, but no future windfall allowance has been accounted for. This source of housing should be acknowledged as such within the SADMP as it is anticipated that this source will continue to form part of the housing completions in the Borough. It does not currently form part of the housing calculation in the plan. Appendix 1 shows the anticipated rates of windfall development per annum.

3.2 Appendix 1 illustrates a total windfall allowance of 228 dwellings p.a. this is based upon 75% of historic completions, acknowledging that there may be a

reduction in the future. Theoretically this would provide a total of 2,736 dwellings over the remainder of the plan period. However, it is important to note that completions from this source could be lower than this. The 'Fosters' appeal inspector only made an allowance for a figure in the region of 645 dwellings arising from windfall sources over the same time period. Therefore, future windfall completions over the remainder of the plan period are to be expressed as a range between 645 – 2,736 dwellings. This would provide a degree of flexibility in the dwellings numbers within the SADMP.

#### **4. The potential of some of our allocations to accommodate additional units beyond the number specified.**

4.1 Appendix 1 also discusses the potential densities on allocated sites and compares these to actual applications received. The conclusion is that there is some flexibility apparent.

4.2 One of the main approaches to the density of the SADMP site allocations was to ensure that there is enough space for the required number of dwellings to be provided as well as the associated infrastructure, and other policy requirements to be realised on site. With the Strategic Sites there is a degree of uncertainty with regard to the precise location and exact space infrastructure such as a new link road or neighbourhood centre will occupy. Consequently some sites may be capable of accommodating additional dwellings, above the number stated within the relevant policy. A scheme proposed for higher numbers, could potentially be acceptable providing it is broadly compliant with the SADMP policy. It should be born in mind the Core Strategy provides for a minimum number of dwellings in the plan period (see Policy CS09) and each sub area, within CS09, requires 'at least' X dwellings. It would therefore not be contrary to the plan to achieve higher figures on individual sites. This could result in an allocated site being developed and built out providing a higher number than stated with the SADMP policy for that site allocation. An appreciation of this degree of site / dwelling flexibility is provided as part of Appendix 1.

#### **5. Re- considering allocations deleted between Preferred Options and Pre – Submission stage.**

5.1 This is an issue in respect of Kings Lynn, where we are required to provide a minimum of 7000 houses over the plan period, but as a general point regarding flexibility it also applies to the rest of the borough where we must demonstrate how we will respond to sites not coming forward. However the focus is the King's Lynn area as the Core Strategy presents this as our most sustainable location accommodating a significant level of growth.

5.2 During the Pre-Submission consultation period in January representations were made about land at West Winch which had been removed from the allocation. This is resulted in strong representations from the landowner which are due to be considered by the Examination. The position of this land is discussed in Section 9.5 below. This is a particularly important situation as it affects our strategic allocation at West Winch/ North Runcton. We have undertaken a sustainability appraisal of the site at West Winch and the results of this are outlined in Appendix 2.

## **6. Land at Gravel Hill (Site 'F') - West Winch**

- 6.1 An area of land adjacent to Gravel Hill, West Winch (it is known also by the description as 'Site F'), and had long been included in consideration of proposals for the strategic growth planned for the area. Opposition to the development of this particular piece of land emerged as a significant issue (among many others) in responses to the Sites Plan Preferred Options consultation in autumn 2013. Please see the map in Appendix 3.
- 6.2 When considering the West Winch proposals for the submission version of the Sites Plan in the light of Preferred Options consultation responses, a decision was taken to remove Site F from the proposed allocation. In formulating its recommendations to the Cabinet, the LDF Task Group took into consideration the opposition to this site from nearby residents and the then Ward Councillor, and that there appeared to be sufficient space within the remaining allocation to accommodate the overall 1,600 dwellings sought.
- 6.3 The owner of Site F is Zurich Assurance Ltd. (ZAL), one of the two main landowners in the growth area, who has promoted and developed proposals for development of the area through the preparation of the Core Strategy and since. In response to the pre-submission consultation in early 2015, and in subsequent evidence to the Plan Inspector, ZAL has argued very strongly that the removal of Site F from the allocation threatens the viability and deliverability of the strategic growth as a whole, and renders the Plan unsound.
- 6.4 ZAL argues that the development planned for Site F cannot simply be relocated elsewhere because it is vital to the phasing and financing of its wider development. In turn this is critical to bringing forward the relief / distributor road and other infrastructure required to both enable the scale of growth planned and provide benefits for the existing local community. Because Site F is the part of ZAL's land that is relatively easily developed, it generates the finance for the infrastructure required to access and deliver other development areas (including land outside its ownership), which no other landowner is in a position to achieve.
- 6.5 In addition to the arguments in the previous paragraph as to why it should be included in the allocation, ZAL has also criticised the technical evidence supporting its exclusion. ZAL argues that the Sustainability Appraisal has inappropriately assessed Site F not on its own merits, but as part of a combined group covering a wider area, and that Site F does not suffer the demerits of the other sites in this group and that are assigned to the group as a whole.
- 6.6 In response to the latter argument put forward in the Examination, an updated sustainability appraisal for the West Winch Growth Area extent, has now been undertaken, with Site F separately identified, in order that it can be fully appreciated how this site performs in itself. The updated sustainability appraisal is found in Appendix 2. This identifies a broadly positive scoring for the sites inclusion.

6.7 A separate, but related, issue is the Inspector's emphasis on flexibility, and clear expectation that the Council should identify a fall-back position, to ensure the full amount of planned development could be delivered if housing numbers anticipated on any allocation were reduced for any reason (as has already happened in at least one case), or that development of any of the allocations should fail to proceed for any reason. In order to demonstrate a robust fall-back position the Council may have to reconsider some of the unallocated sites, and identify some additional or extended sites in order to provide the flexibility and robustness the Inspector is looking for.

6.8 It is therefore reasonable to refocus on Site F, and in particular to reassess, in the light of more recent information and arguments, whether or not the exclusion of this land remains warranted.

- Site F has several advantages:
- It could form a logical extension to the existing development on the west of the A10.
- It is reasonably well situated in relation to existing facilities in West Winch (though not as close to these as some of the areas included within the submitted Growth Area boundary).
- It has reasonable road access and is not wholly dependent for this on the planned relief road or other major infrastructure.
- In addition to this housing, the development is also anticipated to provide new public open space on the southern side of the site.
- Most of it has a low flood risk, and the part that has a higher risk is expected to be included in the open space.

6.9 A particular benefit is that the site could potentially deliver completed houses in a relatively short time. This would help meet housing need, the delivery of the total planned growth for the West Winch area within the Plan period to 2026, and contribute significantly to the 5 year housing land supply.

6.10 The other, and key, advantage is the financial contribution the development could make, and relatively early in the overall development of the West Winch Growth Area. The early availability of infrastructure etc. funding from the value of completed properties on relatively easily developed parts of the growth area is critical to the delivery of the overall growth, and also to meeting the concerns of the Parish Councils and existing residents that the relief / distributor road should be completed as early as possible. Such early funding can be seen as 'pump-priming' for the wider development.

6.11 It is this latter aspect that ZAL emphasises in the objections it has presented to the Inspector. It is not surprising that a landowner would wish to maximise the area to be developed, but ZAL is insistent that its objection is more fundamental than this. This argument is given credibility by the evidence attached to the submission to the Examination. Without access to

detailed costings and other information not currently available to the Council, it is difficult to counter ZAL's evidence to the Inspector.

- 6.12 Thus the Council finds itself in the position that ZAL – one of the two key players delivering the largest single element of the Council's Core Strategy, and a long-term, constructive and cooperative partner (even when there have been divergent views) who would otherwise be supporting the Council at the Plan examination (as it did for the Core Strategy) – is now strongly opposing the Sites Plan in the current examination. ZAL has stated to the Council and to the Inspector that, but for the exclusion of Site F, they would support the Plan, and have agreed a 'statement of common ground' to this effect.
- 6.13 Against the advantages outlined above, the proposed development of Site F attracted a number of objections from local residents who wish to retain the open aspect this site provides from Gravel Hill and other nearby housing, and support for these objections from the then Ward Councillor. The site is one of a significant number of areas the current draft neighbourhood plan seeks to protect from development. (Note this draft plan is currently being consulted on by the Parish Councils, and at this stage can be given little weight formally.) There were also several objections suggesting the road access would be inadequate for its development.
- 6.14 It is suggested that, notwithstanding these objections, development of the site would by itself provide what could easily be argued to be sustainable development (as defined by the NPPF), and it might therefore be difficult to resist a planning application for its development in the current context of the difficulty in demonstrating a 5 year housing land supply. The need to demonstrate flexibility and a fall-back position to the Plan Inspector also points to a need to review such arguably marginal sites. Those matters should be considered alongside the case that ZAL is putting, and which the Council cannot confidently refute: that the exclusion of Site F effectively puts at risk the whole of the planned Growth Area delivery, and thus a key plank of the Core Strategy and the soundness of the Sites Plan currently before the Inspector.
- 6.15 It is conceivable that there are alternative options of sites and combinations of owners in the vicinity of West Winch which could potentially provide a means of unlocking and bringing forward the strategic growth and infrastructure in the plan area. None, however, are currently known. More particularly, it is certainly now, and practical deliverability within the next 11 years, that the Council is being tested on in the Plan Examination. The theoretical existence of potential alternatives which future work may or may not bring to fruition would not provide the Council with the evidence to defend the deliverability, and hence soundness, of the submitted Plan. Unless the Inspector finds the Plan sound, the Council will not be able to adopt it.
- 6.16 In conclusion it was appropriate that the Council, at the earlier stage, recognised local issues and sought to reconfigure the Growth Area boundaries to address the objections of neighbouring occupiers. However, the Council has since received new information, and now finds itself in a very

changed situation with respect to progress of the examination of the Plan and maintaining the strategic thrust of the Core Strategy and the 5 year housing land supply situation. In the circumstances it is not considered there are other reasonable alternatives which provide suitable support for the SADMP. Hence it is appropriate (as noted above) that the Council reconsiders the position and should reinstate Site F in the Growth Area allocation.

## **7. Actions proposed in respect of the five year supply of housing land.**

7.1 In the light of a court judgement concluding the lack of a five year housing supply the Borough Council will (separately to the Local Plan) embark on a programme of bringing forward sustainable sites, beyond the planned allocations to bolster supply. This will of itself add numbers into the housing supply and help provide more flexibility for the Plan.

## **8. An early review of the Plan**

8.1 This will ensure that we maintain as up to date a local plan as we can, including an assessment of housing need, and appropriate supply to meet the need. The Borough Council has already referred to an early review of the Plan, but this is proposed to be reinforced. (Appendix 4 outlines the policy wording required to give effect to this.)

## **9. Conclusion on issues of flexibility/ 'fall back' position**

9.1 We consider that the above approach and detailed changes provide a pragmatic approach and display sufficient flexibility in response to the Inspectors questions.

## **Appendices**

Appendix 1 – Anticipated rates of windfall development and outline of site density assumptions

Appendix 2 – Sustainability Appraisal results for land at Gravel Hill West Winch

Appendix 3 – Location plan for land at Gravel Hill - West Winch

Appendix 4 - Wording for proposed new policy on an early review of the Plan

## **Appendix 1**

### **SADMP: Consideration of a 'fall – back' position in respect of planned housing delivery relating to HRA and flooding issues.**

BCKLWN approach to how the housing delivery can be assured at the level required. In summary the BCKLWN will consider the contributions made by:

1. 'Windfall' development – which will continue to form part of the housing completions in the Borough and this should be acknowledged as such. It does not currently form part of the housing calculation in the plan.
2. The potential of some of our housing allocations detailed within the SADMP to accommodate additional dwellings beyond the number specified in the policy.

#### **1. 'Windfall' Development**

Windfall housing is any residential development that is granted consent on land or buildings not specifically allocated for residential development in the Local Plan, either the 1998 Local Plan or the SADMP. Windfall development takes place on unallocated land and continues to form a large part of housing completions within the Borough.

Allowances within the housing trajectory are made for windfall from large and small sites, this allowance is projected forward. Within the plan, up until now, windfall completions have been counted but future windfall completions have not been factored in. As illustrated below this source of housing makes a significant contribution to the overall number of dwellings that have completed over the plan period to date, and will continue to do so. Therefore this significant source of housing should be acknowledged within the plan as such.

The windfall allowance is based on compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The allowances are realistic, taking account of historic windfall delivery rates and do not include residential gardens. This complies with the NPPF, paragraph 48.

Windfall Statistics:

- There were 3,958 completions from windfall sites between 2001 and 2014, out of a total of 8,093 completions, this equates to 49% of the total completions.
- 59% of the 3,958 windfall completions were derived from large (10 or more dwellings) windfall sites totalling, 2,327.



- 41% of the 3,958 windfall completions were derived from small (less than 10 dwellings) windfall sites, 1,631.
- On average windfall on large sites contributed 179 completions per annum between 2001 and 2014.
- On average windfall on small sites contributed 125 completions per annum over the same time period.

Recognising that there may be some reduction in the completion rate of windfall development in the future only 75% of the average completions per annum between 2001 and 2014 are used to project forward, this is known as the windfall allowance.

- This provides a large site windfall allowance of 134 dwellings p.a.
- A small site windfall allowance of 94 dwellings p.a.
- A total windfall allowance is 228 dwellings p.a.

Using this reduced windfall allowance over the remaining 12 years of the plan period, years since the publication date of the trajectory 2013/14, this would equate to a further 2,736 dwellings arising from windfall sites. The breakdown of this is 1,608 dwellings on large windfall sites and 1,128 dwellings on small windfall sites. The windfall rate will be recalculated each year, with the inclusion of another years' worth of completions from this source.

The stock of small site permissions is continually replenished and will be added to in the future as the Council adopts a new policy to allow infilling in the smaller villages and hamlets category of settlements within the hierarchy, Policy DM3 in the SADMP.

The approach with regard to the allocation of sites within the SADMP process, with the exception of King's Lynn, has been to allocate sites that are outside of settlement development boundaries. This will still allow large and small windfall sites to come forward within the development boundaries as the geographic area within the development boundary hasn't been reduced by allocations within the SADMP. Paragraph D.1.8 of the SADMP Pre-Submission document, Section D .1 distribution of development states *'it is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated sites within development boundaries (especially within towns).'*

Following a court judgment showing the BCKLWN to have a lack of a five year housing land supply, there is the potential, at least in the short term, for an increased number of dwelling to come forward on unallocated land including land outside of the

development boundaries, providing the location is sustainable. This potentially could boost the windfall completion number above the windfall allowance, as this assumes that windfall development would mainly arise from unallocated land within the development boundaries.

The table below details windfall development completions 2001 – 20014

Financial years of completions	2001/2002	2002/2003	2003/2004	2004/2005	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	2012/13	2013/14	Total	Average pa	Reduction	Assumed Rate
<b>Allocated</b> (completion units - large schemes on allocated sites)	219	175	236	221	222	233	215	198	90	148	186	103	167	2,413	186		
<b>Unallocated</b> (completion units - large schemes on unallocated sites)	77	238	284	271	186	133	450	147	56	134	234	53	64	2,327	179	*75%	134
<b>Unallocated - Minor Sites (Less Than 10 Dwellings)</b>	236	229	295	328	275	271	432	230	168	278	204	166	241	3,353	258		
<b>* minor sites - garden land and greenfield</b>	173	121	195	174	187	163	151	79	54	119	92	66	106	1,680	129		
<b>* minor sites - greenfield (not garden land)</b>																	
<b>* minor sites - brownfield</b>	63	108	100	154	88	108	281	151	114	159	112	58	135	1,631	125	*75%	94
<i>* based on % as per AMR 04/05 to &amp; including 09/10. 01/02 - 03/04 = B control completions/ 11/12 % as per site.</i>	27%	47%	34%	47%	32%	40%	65%	66%	68%	57%	55%	67%	56%				
<b>Total Windfall</b>	140	346	384	425	274	241	731	298	170	293	346	111	199	3,958	304	*75%	228
<b>Total Unallocated</b>	313	467	579	599	461	404	882	377	224	412	438	219	305	5,680	437		
<b>Totals</b>	532	642	815	820	683	637	1,097	575	314	560	624	322	472	8,093	623		
* Note Garden land was classed as brownfield until 31 March 2010. Figures here represent that and have not been amended. From April 11 the new classification has been used.																	

## **2. The potential of some of our allocations to accommodate additional units beyond the number specified.**

The Council's approach to the potential density of allocated sites is described in detail within the Council's statement 'Issue 3: The Broad Distribution of Housing (Section D.1)' section 3.3.

One of the main approaches to the density, of SADMP site allocations, was to ensure that there is enough space for the required number of dwellings to be provided and the associated infrastructure and other policy requirements to be realised on the allocated site. With the Strategic Sites there is a degree of uncertainty with regard to the location and exact space infrastructure such as a new link road or neighbourhood centre will occupy. Some sites may be capable of delivering the desired dwelling numbers that result in part of the site being undeveloped.

This undeveloped area could potentially be allocated in future plans, utilised in the review of the plan or a planning application could come forward that detailed higher numbers than the relevant policy, providing the proposed scheme was broadly compliant with the allocated site's policy within the SADMP, this may potentially be acceptable. This could result in an allocated site being developed and built out providing a higher number than stated with the SADMP policy for that site allocation.

Overleaf is a list of some of the sites that could have the potential to provide a higher number than the stated by the corresponding SADMP site policy. This is not to exclude the other sites, but to give an indication based upon comparing the desired model density and the SADMP modelled density.

It should be noted that any proposed development will need to ensure that it is acceptable in terms of normal planning requirements. It is not the intention to overload or overcrowd the viability.

Settlement	Site Ref	Dwelling Allocation	Gross Site Area (Ha)	Model Net Area (Ha)	Model Density (dw per Ha)	SADMP Modelled Density (dw per Ha)	Policy Overview
West Winch	Growth Area	1,600	171	128	39	13	new road, open space, neighbourhood centres, provision of space for future development
South Wootton	E3.1	300	40	30	39	10	Large area of Flood Zone constraints, recreational space, new road network, doctors site, school expansion land, SUDS
Knights Hill	E4.1	600	36.9	27.6	39	22	to blend in with the surrounding developments, new road
Downham Market	F1.3	250	16.2	12.2	36	20	landscape buffer, road network, GI , recreation space
	F1.4	140	13.9	10.4	36	14	new road network, landscaping, GI, recreational space
Wisbech Fringe	F3.1	550	25.3	18.9	36	29	road network, potential new school site, SUDS, public right of way enhancements
Docking	G30.1	20	3.4	2.55	24	8	Landscaping, pond retention, SUDS
Gayton	G41.1	23	2.8	2.1	24	11	Reflect the local settlement pattern
Heacham	G47.1	60	6	4.5	24	13	Recreation space, SUDS

## Appendix 2

### Sustainability Appraisal relating to West Winch Site 'F'

Updated West Winch Growth Area Sustainability Appraisal

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 Environment	Infrastructure, Pollution & Waste
<b>West Winch Growth Area</b>	<b>++</b>	<b>+</b>	<b>0</b>	<b>X</b>	<b>+</b>	<b>#</b>	<b>+</b>	<b>#</b>	<b>#</b>	<b>#</b>
Sites to the east	++	+	0	X	+	X	?	X	0	#
Sites within North Runcton	+	+	0	X	+	X	X	0	0	#
Sites to the south	+	+	0	X	+/X	X	X	#	0	#
Within West Winch	++	+	0	X	+	X	+	X	X	#

Site 984, 1034	+	+/X	0	+/X	+	0	+	+	#	#
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West Winch Growth Area – This area is considered as a sustainable location for growth, south east of King’s Lynn, as identified in the Core Strategy. The Growth Area performs well in relation to the indicator ‘access to services.’ The impact on ‘landscape and amenity’ depends on how the scheme is implemented as potential negative impacts could be avoided or mitigated through good design. The Growth Area comes close to the listed buildings of Church of St Mary (Grade 2\*) and the Windmill (Grade 2) consequently the setting of these have to be treated with great care and potential negative impacts avoided through good design. The site is not constrained by flood risk. The West Winch Growth Area is the chosen allocation as in comparison to other sites considered it will maintain the gap between West Winch and surrounding settlements whilst relating well and enhancing the facilities available for the original settlement. The Growth Area includes the following sites: KWW01, 569, 683, 979, 980, 1047, 1048, 1108, 1240 & 1241 and parts of the following sites: 485, 973, 981, 982, 983, 987, 1034, 1046, 1096, 1220, 1221, 1223, 1224 & 1225

East of the West Winch Growth Area (1095, 1096, 1220, 1224 & 1225) – These sites sit within the gap between the Growth Area and North Runcton, this results in a negative score for the Sustainability Appraisal factor ‘landscape and amenity’ as one of the Plan’s aims is to maintain a gap ensuring that North Runcton remains a distinctive settlement separated from the Growth Area and the associated new link-road. Development of these sites would reduce or remove this gap and therefore impact negatively on the form and character of North Runcton. A further negative is recorded for the factor ‘heritage’ as the sites are within close proximity to three listed buildings in North Runcton; The Church of All Saints (Grade 1), The Old Rectory (Grade 2) and North Runcton Lodge (Grade 2).

Within North Runcton (68, 465, 661, 1189 & 1276) – These sites are located within the settlement of North Runcton, which is designated as a smaller village and hamlet by the Core Strategy and as such does not receive any specific site allocations. In relation to the Growth Area these sites are not only detached, reflected by a negative score in the factor for ‘highways & transport’, but they could also have a negative impact upon the heritage, form and character of North Runcton.

To the South (177, 196, 479, 659 & 1293) – These sites are situated to the south of the Growth Area and as such are detached from it. A negative score for the factor ‘highways and transport’ has been recorded as Norfolk County Council as the Highways Authority comment that these sites are unsuitable due to their remoteness or they would require direct access from/onto the A10. Development of some these sites would result in reducing the gap between the Growth Area and the existing settlement of Setchey, impacting negatively upon the heritage, form and character of Setchey. Setchey is designated as a smaller village and hamlet by the Core Strategy and as such would not receive any specific site allocations. In relation to the Growth Area those sites that are situated within Setchey score negatively in the Sustainability Appraisal factor ‘flood risk’ as they are located within either Flood Zone 2 or 3. Development of Site 1293 would result in the direct loss of employment land; this would result in a negative score in the factor ‘economy A business’ in accordance with policy CS10 of the Core Strategy, and therefore the economic sustainability of a new plan, the Council will seek to retain land or premises currently or last used for employment purposes.

Within West Winch (KWW06, 135, 361, 485, 657, 926, 973, 982, 983, 1045, 1222 & 1273) – These sites are within the existing settlement of West Winch and have been omitted from the Growth Area. In totality negative scores for the factors ‘natural environment’ and ‘landscape and amenity’ are recorded as the majority of these sites would either encroach upon West Winch Common or result in the direct loss of Common Land, therefore not relating to the existing settlement by having a negative impact upon the form, character and setting of West Winch. A number of these sites are detached from the Growth Area and the line of the new link-road, resulting in a poor relationship between the new Growth Area. A number of these sites come close to linking the southern section of King’s Lynn and parts of the Saddlebow Industrial Estate with West Winch; the Growth Area seeks to maintain a gap between West Winch and existing settlements. Note that KWW06 has already been developed and part of 485 is an existing residential dwelling so has not been included within the Growth Area.

Site 984, 1034 ('Site F') – This site is to the south west of the village centre, immediately adjacent to the existing settlement. In terms of access to services, the site is close to bus stops and an employment area to the south but is further from central village convenience services than some options (e.g. c800m to community centre, c1km to shop, school and church) . However, the implementation of proposals for the growth area will increase the service provision in the local area and therefore the site will benefit from its good access links through existing development. The development of this site is expected to include new public open space and allotments, and these are scored as community and social gains additional to the housing provision. While there was opposition to the sites development from nearby residents, it is considered appropriate to score an overall plus in this category. However the site is currently agricultural land and therefore the scores a negative in relation to category 'Economy B Food Production', but also scores a positive because its development would include allotments and hence local food production, resulting in a mixed score. The majority of the site is in SFRA fluvial flood zone 1 (climate change scenario), but a minor portion in the south western part of the site is within zone 2. As this higher flood risk area can accommodate the allotments and/or public open space proposed, rather than housing, an overall positive score is given under this heading. There are no heritage assets such as Listed Buildings within proximity of the site and it is therefore scored as no impact in the 'Heritage' category. The site has adequate road access. Although it suffers from the heavy traffic and congestion on the A10, along with the whole of the settlement and potential development area, this is intended to be addressed through provision of the relief/distributor road element of the strategic growth. It is close to bus stops, and hence is scored positive for 'Highways and Transport'. The site is well related to the existing settlement as the northern and eastern boundary of the site is adjacent to residential development. The western and southern borders open countryside. The impacts on 'landscape and amenity' include a loss of semi-rural outlook to a number of existing properties, but also the gaining of a similar outlook to some for the new properties. The development of the site would have little impact in distant views from the west, but would increase the extent of development close to West Winch Common and the footpath which passes along it. However, the development includes public open space and allotments and this would have landscape and amenity benefits. An overall positive score is considered appropriate. The development of the site could include habitat and biodiversity enhancements as part of the open space, but would result in a loss of some open land, hence a mixed score on Natural Environment. There development of the site would contribute to the area's infrastructure, and therefore a positively under this heading.

## Discussion

On balance the Growth Area performs better than other combinations as it isn't constrained by 'flood risk', would have the least impact upon the form and character of existing settlements and any potentially negative impacts associated with 'landscape & amenity' and 'heritage' can be minimised through good design. There would however be a negative score in factor 'economy B food production' with identified productive agricultural land being lost to development, although this is the case with all of the sites proposed, and was factored into the identification of the area by the Core Strategy. The new-link road between the A10 and A47 is planned to provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their geographic location, are detached from this 'fixed line' and/or the Growth Area itself. This connectivity is vital to achieving links and integration between new residents and business and can contribute to a healthy community. In selecting the extent of the Growth Area, consideration has been given to maintaining a degree of separation between North Runcton and the new neighbourhoods, and to provide a good level of integration with the existing development and facilities in West Winch.

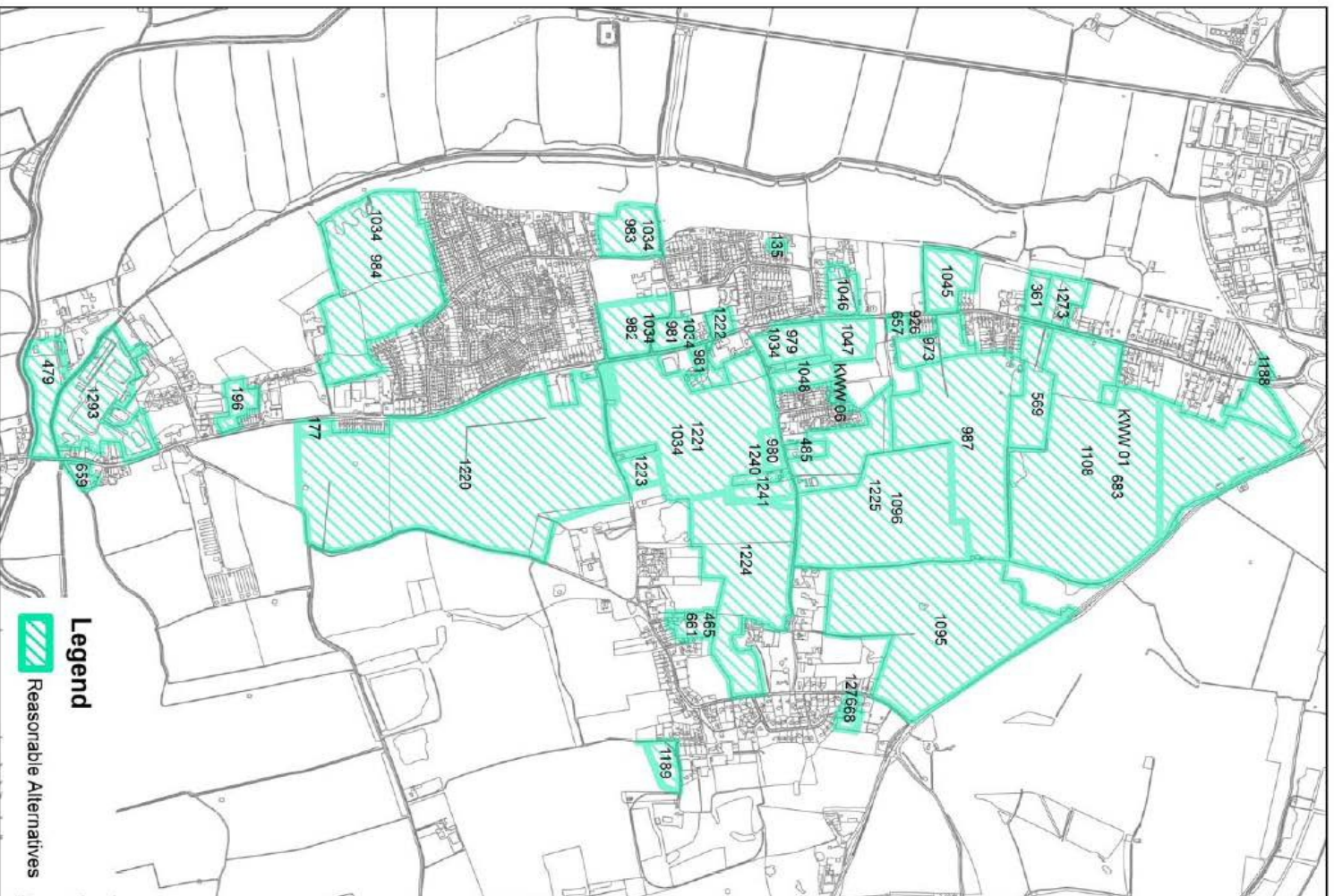
Sites 998 & 1034 (known as Site F) was included in the Preferred Options but excluded from the submitted Plan. In response to evidence and arguments presented to the Plan Examination it has become appropriate to review the merits and demerits of this site in isolation, rather than in combination with other sites on the west of the settlement, and hence a new separate evaluation of this has been done. Because of the contentious status of this site, and the difficult decisions to be made which will be informed by its SA, this has been done in a little more detail than the earlier work. Broadly speaking this site scores positively



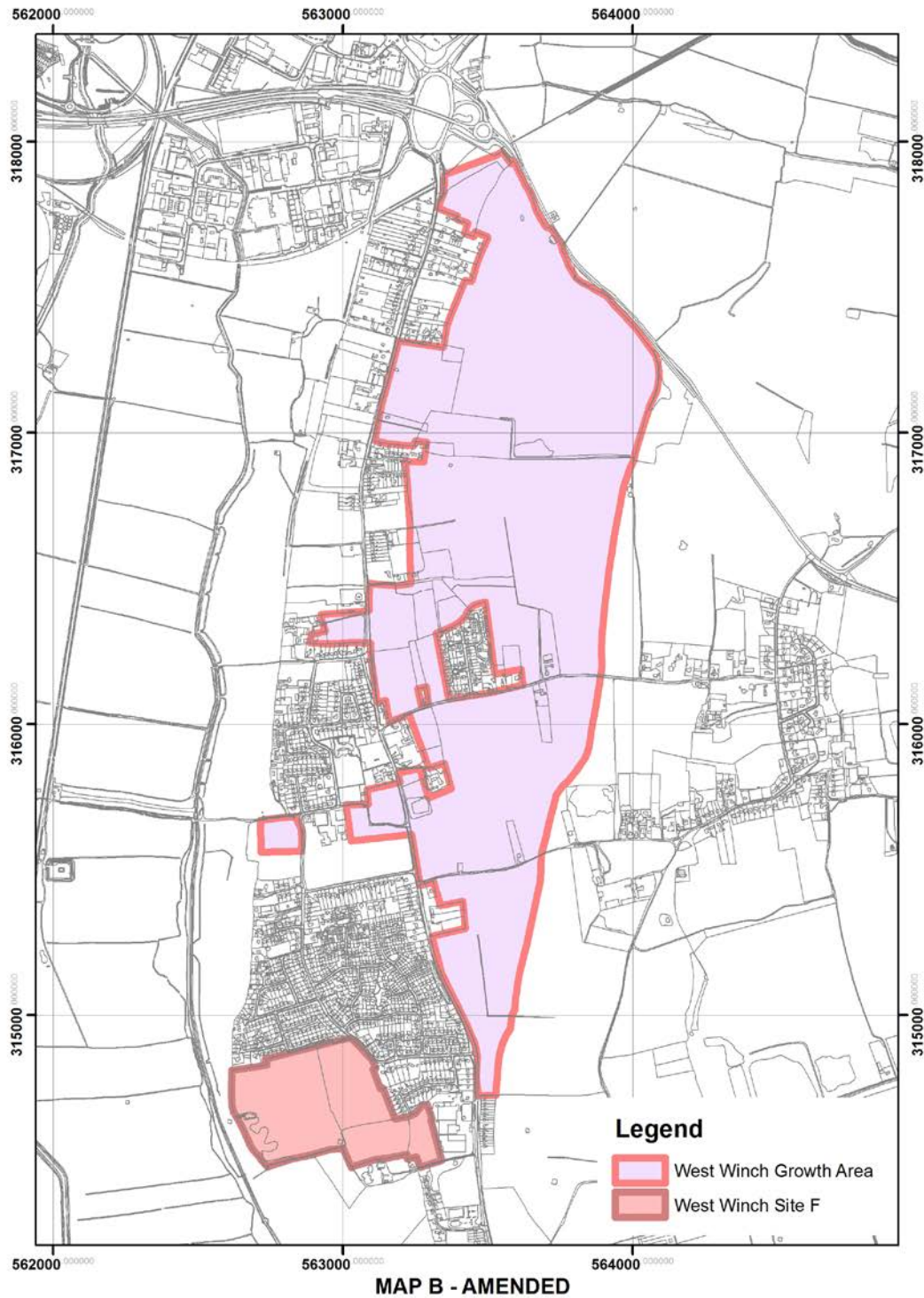
on a range of fronts, and while opposed by nearby residents has no major adverse impacts, and its inclusion in the growth area is considered to represent sustainable development.

#### Conclusion

As discussed above, The Growth Area, and the inclusion of Site F (Sites 998 & 1034), on balance represents the least constrained combination of sites for development that still provides a degree of separation from North Runcton, when compared to the other reasonable options considered. Therefore this Growth Area, including Site F, is an appropriate allocation for an urban expansion area adjacent to south east King's Lynn.



# Appendix 3 Location plan for land at Gravel Hill - West Winch



## **Appendix 4**

### **Proposed New Policy - An early review of the Plan**

#### **DM2 - Early Review of Local Plan**

An early review of the Local Plan will be undertaken, commencing with the publication of a consultation document (a Draft Local Plan) in 2016. This is set out in the Local Development Scheme (LDS). An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period, with the most up to date policy framework to secure continuity for the longer term.

The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with national policy (National Planning Policy Framework).