



**Follow up work in relation to the Examination  
into the King's Lynn and West Norfolk Local  
Plan: Site Allocations and Development  
Management Policies**

**Housing Modifications and wording for describing  
numbers of houses in specific site allocation policies**

**November 2015**

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## **Housing Modifications**

### **Housing – General**

Amend the supporting text at paragraph D.1.16 about ‘minimum’/‘at least’ for housing numbers in the Plan, subject to constraints as follows:

“It should be borne in mind that the Adopted Core Strategy (Policy CS09) provides for a minimum number of dwellings in the plan period with each sub area requiring at least X number of dwellings. It would therefore not be contrary to the Plan to achieve higher figures on individual sites, subject to constraints.”

Include a cross reference in the supporting text at paragraph D.1.16 to state that “Policy DM1 - Presumption in Favour of Sustainable Development is the starting point for considering applications, and the following paragraph D.1.17 refers to the guide figures for settlements as set out in Appendix 5.”

### **Housing - Distribution**

Add supporting text to paragraph D.1.14 to further clarify that in the Settlement Hierarchy services were considered and then population size was used to determine housing number distribution as follows: “In the Settlement Hierarchy services were considered and then population size was used to determine housing number distribution.” to replace the following text: “The Council considers that the distribution of houses is best done by allocating growth to settlements proportional to the existing populations.”

Add the following cross reference to paragraph D.1.14: “The opportunities and constraints in settlements/sites are set out in the following paragraph D.1.15.”

Include reference to Policy CS02, in paragraphs D.1.14 and D.1.17 as follows:

D.1.14 “The Settlement Hierarchy is set out in Policy CS02 of the Adopted Core Strategy.”

D.1.17 “This approach is in line with the Settlement Hierarchy set out in the Adopted Core Strategy Policy CS02.”

### **Housing - Definition of Windfall**

Modify the wording at page 424 (Glossary) and paragraph D.1.8 to give a consistent definition of windfall as follows:

D.1.8

“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 (windfall) sites, usually previously-developed within development boundaries (especially within the towns). The new policy for infill development in the smaller villages and hamlets (Policy DM 3) will add to the potential for small-scale windfall sites to come forward.”

This change would be in line with the SADMP Glossary (page 424) and the NPPF/PPG glossaries:

<b>Windfall Allowance</b>	A provision in a plan for an amount of development (usually housing) estimated to be likely to occur during the plan period on sites which have not been specifically allocated for development. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).
<b>Windfall Site</b>	A site not specifically allocated but which comes forward for development during the course of a plan. These are most often previously developed sites being redeveloped or more intensively developed. The term is most often used in relation to the supply of housing.

**NPPF/PPG Glossary – “Windfall sites:** Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”

## 1. Inspector request

**1.1 Site Allocation Policies** – There are a variety of descriptions used in SADMP policies. Descriptions include: ‘some x’, ‘minimum x’, ‘around x’ dwellings. Borough Council to consider whether a uniform approach would be helpful, possibly using the description ‘at least’. (Cross reference to Issue 3, 30/9 which noted the possibility to add a paragraph about ‘minimum’/ ‘at least’ for housing numbers in the Plan, subject to constraints. Cross reference this to DM1 also, and D.1.17)

## 2. Response

2.1 The adopted Core Strategy provides in Policy CS09 for a ***‘minimum of 16 500 new dwellings across the Borough over the period 2001 to 2026’***. This is referenced in paragraph D1.1 and D1.4 and D1.16 of the SADMP. Paragraph D1.16 discusses the ‘minimum’ provision. Table D1.5 at page 71 sets out how this is distributed in the SADMP locations.

2.2 It is clear that the SADMP must conform to the Core Strategy and the sections noted above seek to describe how this relationship works.

2.3 In the Borough Council’s ‘Response to Inspector’s Note to the Council (9th July 2015) - Consideration of a fall-back position in relation to housing delivery’, it was explained how the Borough Council’s housing delivery can be assured at the level required. The following elements were outlined:

- 5 year land supply additional sites are coming forward in addition to ‘planned’ sites.
- Increased densities are being achieved on plan sites
- Windfall permissions continue to come forward.

All of which are likely to result in total housing units being in excess of the planned 16 500 by 2026. Therefore we are likely to be compliant with the Core Strategy, i.e providing a ‘minimum’ figure.

2.4 Paragraph 47 of the NPPF gives the role of local planning authorities as being to ***‘To boost significantly the supply of housing...’*** We are unlikely to be fulfilling the intention of the NPPF by concentrating on the absolute minimum.

2.5 The role of plan (SADMP) sites is however vital. It is this plan that is seeking to positively meet the minimum of 16 500 units through the allocations made in it. It is therefore important that all of the ***planned*** sites collectively achieve this total. There will be variation in the numbers released on planned sites despite the best endeavours to establish the optimum numbers on a site. Some sites will provide more and others less due to a variety of local circumstances. However in order to bolster the requirement in the Core Strategy and seek to emphasise the Government intentions it would be appropriate to include a standardised phrase in each policy.

2.6 It is proposed that the phrase '*minimum of*' be added to all policies. However it does need to be recognised that there will be practical circumstances where a planning application is made and it is not possible or desirable to insist on such an approach. This might relate to unacceptable densities, form and character issues etc. Additional text will be added to the 'Distribution of Development' section D1, to explain the position.