

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

## **Independent Examination**

### **Statement for Issue 3: The Broad Distribution of Housing**

**Savills (Uk) Limited on behalf of Holkham Estate  
- Representation number 1248**

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#### **Prepared by**

Savills (UK) Limited  
*Unex House*  
*132-134 Hills Road*  
*Cambridge*  
*CB2 8PA*

CAPL/240096/A6/GH

**Kings Lynn and West Norfolk Local Plan: Site Allocation and Development Management  
Policies – Independent Examination**

**Savills (Representation number: 1248) Statement on behalf of Holkham Estate**

**Issue 3 : The Broad Distribution of Housing (Section D.1)**

**3.1 Does the SADMP accurately reflect the requirements of the adopted Core Strategy, particularly in terms of meeting identified housing need?**

3.1.1 We are not submitting any specific comment on this matter.

**3.2 Has the Council adequately justified the proposed distribution of development across the Borough? What has been the role of Parish Councils in the distribution process?**

3.2.1 Savills UK Limited act on behalf of the Holkham Estate in respect of planning matters across their landownings. Representations have already been made on behalf of the Estate on a number of general matters as well as in respect of specific sites across the Borough and these have been submitted at all of the relevant consultations stages of the development plan.

3.2.2 In response to the Inspector's invitation for us to attend this session on the broad distribution on housing, we relate these to the submissions made by Savills on behalf of the Estate to the Pre-Submission document where issues of settlement hierarchy and the apportionment of dwellings to particular settlements were raised. Such comments were made in the context of looking at more growth at Burnham Market but apply equally to settlements across the Borough.

3.2.3 In considering the distribution of new dwellings across the administrative area of Kings Lynn and West Norfolk, it is important to consider the context of how the settlement hierarchy was derived.

3.2.4 From our understanding, the terms derive from work undertaken in the context of the East of England Plan (paragraph 3.17:

*"... Key service centres are large villages with a good level of services, which might include:*

- a primary school within the settlement and a secondary school within the settlement or easily accessible by public transport;*
- primary health care facilities;*
- a range of retail and service provision capable of meeting day-to-day needs, particularly for convenience shopping;*
- local employment opportunities; and*
- frequent public transport to higher order settlements."*

3.2.5 Such a definition then allowed local planning authorities to identify services and facilities within villages which would be relevant to gauging where settlements would fall to be considered within a hierarchy. As far as Kings Lynn and West Norfolk was concerned, the work enabled them to place certain settlements into the categories of Key Service Centres, Rural Villages and Smaller Villages or Hamlets.

3.2.6 The methodology up to this point is supported because it follows the approach taken by many other rural planning authorities who were creating a new plan under the aegis of the East of England Plan. The application of a measurement where the identification of a settlement meant that it would be placed in a certain category within a settlement hierarchy based on the level of services and facilities is entirely appropriate. At this point, it is fully acknowledged that the creation of a hierarchy in this fashion is of course not infallible - services and facilities change over time and the importance of a particular service or facility to a village may be critical to one person but marginal to another. However, it is our view that this approach is appropriate if nothing else because many other authorities applied this logic back in the early 1990's.

3.2.7 The hierarchy created Core Strategy policy CS02 (settlement hierarchy) and which therefore, according to the information supporting the work on the Core Strategy, identified all relevant settlements and placed them in relevant categories according to the level of services and facilities. It is at this point that the Council's methodology moved away from an assessment of the number, scale and availability of service and facilities to an approach of identifying growth based upon the numbers of people living in a settlement.

3.2.8 Paragraph D.1.14 states that the Council considers that the distribution of houses is best done by allocating growth to settlements proportional to the existing populations. On this basis, the Council state that the amount of development would be closely related to its scale. That certainly is the case but is based on a view that the size of a settlement is a

reflection of its sustainability. Whilst we accept that the larger the village in terms of population then it is likely it will have a higher order of services and facilities. However that cannot always be the case. Similarly, the larger the population it cannot be assumed that the particular settlement is capable of taking higher amount of development since there may be issues of infrastructure capacity, landscape or other environmental designations that affect the ability of the town or village to accommodate such growth.

- 3.2.9 We appreciate that the Council has sought to make it clear that they do not rigidly apply the approach within paragraph D.1.5 of the Plan yet Appendix 5 of the plan contains a considerable amount of forensic analysis which suggests more of planning by numbers rather than assessing capacity applying other planning consideration such as landscape designations, distance from and to amenities, school capacities, sewerage capacity etc. Indeed the Council may have looked to resist development on the basis that the allocated number of houses in a settlement as a percentage of the guide number is already too high. However, again this does not reflect the ability of the settlement to accommodate more growth. We know that villages can possess shops which allow for day to day retailing needs, eating establishments and GP and health surgeries and which are all key characteristics of a sustainable settlement.
- 3.2.10 In the instance of Burnham Market as an example the Council accept it is one of the best served villages in terms of services and facilities and we consider it has a role greater than accommodating development than simply the Foundry Field site which now has the benefit of planning permission.
- 3.2.11 Consequently we consider that questions need to be raised over the effectiveness of the SADMP in applying an approach which in our view places significant weight upon the size of a settlement and thus its ability to accommodate growth rather than giving clearer guidance to the reader that other relevant planning considerations have been taken into account in assessing the ability of any settlement to accommodate growth. To this end the Council need to be able to provide clearer justification as to why a higher or lower figure for a settlement has been chosen if it chooses to maintain its policy approach. Paragraph D.1.15 states that account has been taken of Parish Councils views but we cannot find any evidence to justify the Council's plan position.

### **3.3 How has the Council assessed the potential density of development on each of the allocated residential sites?**

- 3.3.1 We are not submitting any specific comment on this matter.

