

Statement

Issue 5: West Winch (E.2)

Northern Trust (465)

June 2015

Contents

Summary of conclusions

Questions and responses

1. Question 5.1
2. Question 5.2

Appendices

- A. Area plan, February 2015
- B. Professional opinion on viability of plan, June 2015
- C. Draft planning performance agreement, October 2014
- D. Framework masterplan, October 2013

Summary of conclusions

1. The following parts of the Site Allocations and Development Management Policies ('SADMP') are unsound:
 1. Primarily, the exclusion of land off Gravel Hill Lane from the policies map; and
 2. Secondly, phrases in the policy and supporting text to policy E2.1 as detailed in paragraph 6 below.
2. In respect of the above, the SADMP fails the following soundness tests:
 1. Positively prepared;
 2. Justified;
 3. Effective; and
 4. Consistent with national policy.
3. The SADMP fails the above tests because:
 1. The SADMP is not positively prepared because the exclusion of land off Gravel Hill Lane from the development area in inset E2 will have significant consequences on the level of funding generated from the scheme to contribute towards the desired strategic outcomes;
 2. The SADMP is not justified because the inclusion of all land as shown on the area plan and framework plan on the policies map is the most appropriate strategy to deliver the collective vision (as shown in Exploring Sustainable Growth, September 2010), and the delivery of agreed infrastructure priorities. The exclusion of land off Gravel Hill Lane is not a reasonable alternative because there is not a high level of assurance that the plan is deliverable (as evidenced by the appended financial viability opinion);
 3. The SADMP is not effective because it is not deliverable over its period (as evidenced by the appended financial viability opinion) and it undermines the delivery requirements of draft policy E2.1;
 4. The SADMP is not consistent with national policy because the exclusion of land off Gravel Hill Lane does not pay careful attention to viability and costs in plan making (173, Framework) and there is not a high level of assurance that the plan policies are viable (PPG, 10-005-20140306).
4. The SADMP is also not legally compliant because the sustainability appraisal does not specifically identify, describe and evaluate the likely significant effects on the environment of retaining sites 984 and 1034 in the Growth Area taking into account the objectives of the plan (principally the outcomes set out in Part A of policy E2.1 including the provision of affordable housing, a new link road and local highway improvements). In this respect, the plan is not legally compliant with the Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 12).
5. The SADMP can be made legally compliant and sound by including land off Gravel Hill Lane within the development area on the policies map as shown on all earlier drafts of the plan and by making minor changes to the text of policy E2.1 as listed in paragraph 6 below.
6. The precise change and/or wording that we are seeking is (strikethrough delete: underline add):

1. E.2.6: '(Work by the Prince's Foundation for the Built Environment (sponsored by a major landowner and undertaken with the active involvement of local people), together with sites and information put forward, suggests that a total of 3,000 to 3,500 up to 5,050 additional dwellings could potentially be accommodated in the fullness of time).
2. E2.1: 'Land in the vicinity of West Winch of around ~~171~~ 238¹ hectares, as shown on the Policies Map, is allocated for development to provide the following strategic outcomes ...' [the additional land is to include land off Gravel Hill Lane];
3. E2.1(3): 'a broad range of dwelling types, to provide choice and meet different needs, including a proportion of affordable housing commensurate with the local planning authority's standards at the time and subject to viability;
4. E2.1(a) the strategic diagram should be replaced by the framework masterplan (appendix D);
5. E2.1 (e(1)): 'a ~~comprehensive strategic transportation plan~~ Hardwick Interchange Study and individual transport assessments, assessing the traffic likely ...',
6. E.2.49: 'Improvements to its capacity are therefore required and ~~should be funded by the development~~ the developments should contribute towards its funding';
7. E.2.53: '~~As the funding of the new road will come primarily from the growth area development~~ The developments should make contributions to the provision of the new link road ...'
8. E.2.59: 'The developers should provide subsidies for the new service if necessary and viable'.

¹ Area 1 (52 hectares) + Area 2 (186 hectares) (please see area plan in appendix A).

1.0 Questions and responses

Question 5.1

Is there evidence that any elements of the proposed development in the West Winch Growth Area (E2.1) 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? Should there be a reference in the policy to public transport provision?

- 1.1 Prior to the submission of the Site Allocations and Development Management Policies ('SADMP'), ZAL and Northern Trust, as part of a project delivery group² led by the local planning authority, discussed the infrastructure required and costs associated with draft policy E2.1. During those discussions a draft infrastructure delivery plan ('draft IDP') was prepared that sought to demonstrate that comprehensive development in the Growth Area was deliverable in the shorter term and developable in the longer term.
- 1.2 The draft IDP that was discussed at the Project Delivery Group was included as a supporting statement to the representation submitted by Northern Trust dated 23 February 2015 ('the representation') and is based on the area plan, February 2015 (appendices A and D). Both the area plan and the framework masterplan include all land owned by ZAL (including land off Gravel Hill Lane (also known as Site F)) as this formed a fundamental part of the development of the overall strategy for West Winch in previous drafts of the local plan, as a result of the first local consultation. Indeed, it was not until the exclusion of land off Gravel Hill Lane in the 4 November 2014 Cabinet report (i.e. a late stage of plan making) that our objection to the soundness of the SADMP arose.
- 1.3 Appended to this statement is a financial viability opinion that demonstrates that with the inclusion of land off Gravel Hill Lane that there is a high level of assurance that the plan policies are viable and that the SADMP is sound, whereas with the exclusion of land off Gravel Hill Lane the SADMP is unsound for the following reasons:
 1. The SADMP is not positively prepared because the exclusion of land off Gravel Hill Lane from the development area in inset E2 will result in the loss of 20% of new homes within the Growth Area during the plan period, which will have significant consequences on the level of funding generated from the scheme to contribute towards the desired strategic outcomes, in particular the new link road;
 2. The SADMP is not justified because the inclusion of all land in area plan and framework masterplan is the most appropriate strategy to deliver the collective vision (as shown in Exploring Sustainable Growth, September 2010, which was part of the evidence base of the adopted Core Strategy) of walkable neighbourhoods and the delivery of agreed infrastructure priorities for the sustainable development of the area. The exclusion of land off Gravel Hill Lane is not a reasonable alternative because there is not a high level of assurance that the plan policies are viable (as evidenced by the appended financial viability opinion). Importantly, the Council has provided no evidence that the plan is underpinned by a broad understanding of viability (PPG, 10-005-20140306);
 3. The SADMP is not effective because there is not a high level of assurance that it is deliverable over its period (as evidenced by the appended financial viability opinion) and it undermines the delivery of 'three new neighbourhoods' and 'a neighbourhood centre in

² West Winch Project Delivery Group comprises the local planning authority, landowner groups and ATLAS.

each of these neighbourhoods, providing a cluster of facilities and a visual and community focus for both existing and new residents' (draft policy E2.1) as the bulk of new housing will not be within a walking distance of one of these neighbourhood centres, which is a requirement of draft policy E2.1;

4. The SADMP is not consistent with national policy because the exclusion of land off Gravel Hill Lane does not pay careful attention to viability and costs in plan making (173, Framework). Importantly, the CIL Viability Study (November 2013) ('the CIL Study'), which is a supporting document to the SADMP, recognises that strategic sites can have significant infrastructure requirements that can have a dramatic impact on viability. As vital contributors to the objectives of the plan, in some cases, if these sites do not come forward then the development plan may be put at risk (7.16, CIL Study). For this reason, the appended financial viability assessment assumes a lower CIL rate than the draft charging schedule, however, the detailed viability assessment will be undertaken as part of the final preparation of the IDP. Critically, the Council has not provided any evidence to demonstrate that the plan is underpinned by a broad understanding of viability (PPG, 10-005-20140306).

- 1.4 We have no strong opinion either way on whether there should be a reference to public transport provision, as we believe that public transport provision will be covered in individual transport assessments and by CIL payments to be spent in accordance with the local transport plan prevailing at that time.
- 1.5 The SADMP is also not legally compliant because the sustainability appraisal does not adequately outline the reasons for rejecting the land off Gravel Hill Lane (referred to as sites 984 and 1034) as it includes these sites within a group of other sites that have markedly different characteristics. Notably, the group of sites were rejected in totality and land off Gravel Hill Lane displays none of the characteristics in the reasons for the rejecting the sites and no conclusion was made on the overall sustainability including positive impacts of the different alternatives taking into the account the objectives of the plan (principally the outcomes set out in Part A of policy E2.1 including the provision of affordable housing, a new link road and local highway improvements). If the objectives of the plan had been taken into account then the sustainability appraisal may have come to a different conclusion on the weight of positive effects arising from the inclusion of sites 984 and 1034 (namely, the prospects of the delivery of the strategic outcomes). In this respect, the SADMP is not legally compliant with the Environmental Assessment of Plans and Programmes Regulations 2004 (Regulation 12).

Question 5.2

In terms of part B of policy E2.1, how and when will a) be undertaken and expected [demonstrate how the proposals for development of the individual application area(s) contribute to the implementation of each of the outcomes listed above and their indicative distribution shown on the strategic diagram] and when will b) [the infrastructure delivery plan] and c) [scheme and timetable for phasing] be expected?

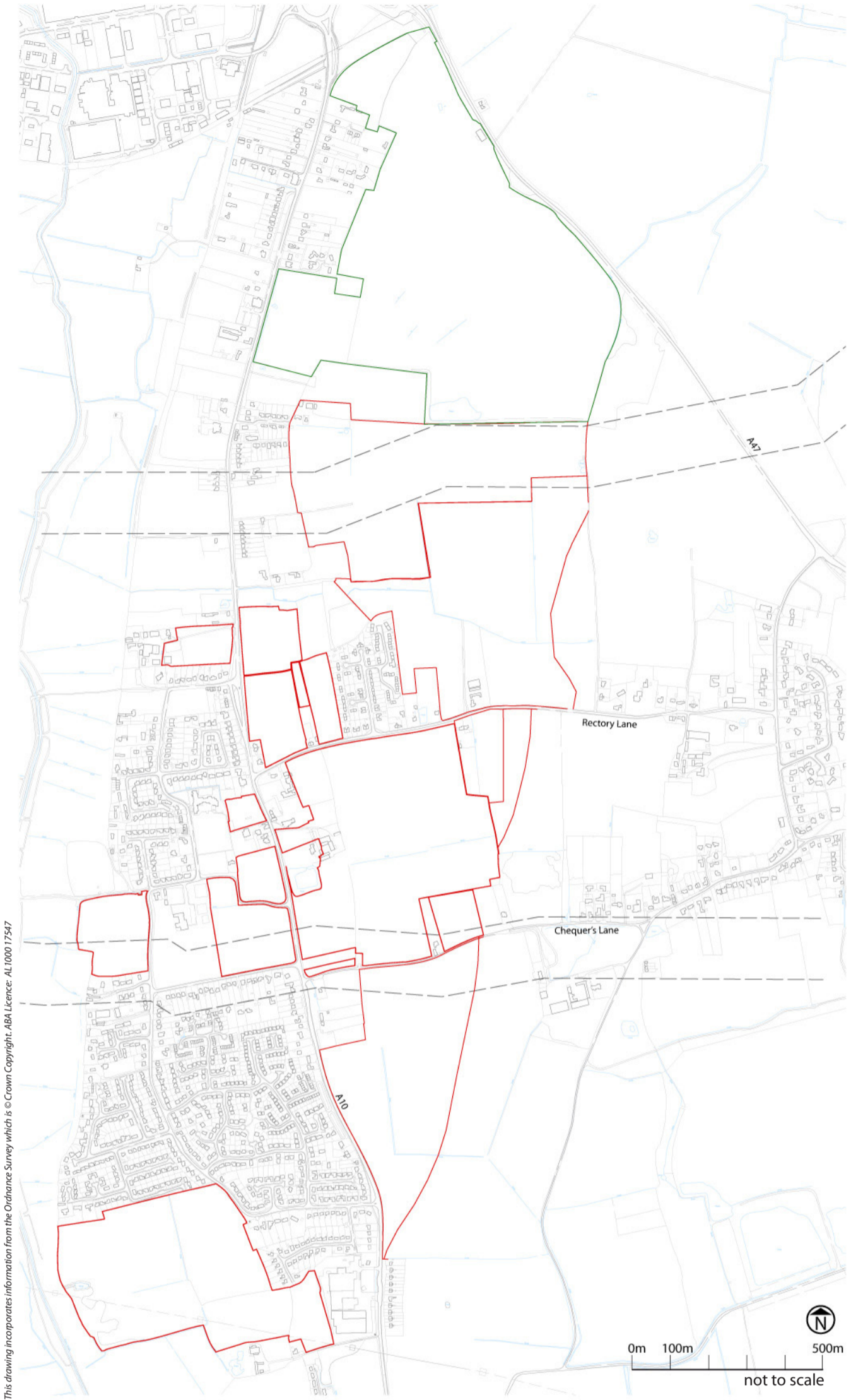
- 1.6 Prior to the 4 November 2014, the Project Delivery Group was close to signing a planning performance agreement, 28 October 2014 ('draft PPA'), which was set out in two parts, being:
 1. Allocation wide: notably the 'strategic issues that require all landowners to work collaboratively with the local planning authority to deliver a framework strategic concept plan, infrastructure delivery plan and high-level development plan viability appraisal in

- order to ensure a sound policy in the detailed policies and sites plan and deliver a high quality development and associated infrastructure in a timely way (i.e. role in both plan-making and development management)’ (Introduction, draft PPA); and
2. Site specific: ‘for shaping and determining planning application(s) relating to land within the Growth Area’ (Introduction, draft PPA).
- 1.7 The draft PPA set out how and when the development proposals would contribute to the implementation of each of the outcomes in part A of policy E2.1. The draft PPA also set out when the IDP and the scheme and timetable for phasing was expected. In short, the following milestones were identified for pre-examination:
1. ‘Completion of a draft allocation wide IDP identifying allocation-wide infrastructure requirements, costs and delivery plan agreed by all parties;
 2. Completion of an allocation-wide strategic concept plan agreed by all parties;
 3. Completion of a high level allocation-wide viability appraisal; and
 4. Statement of common ground for plan examination agreed by all parties.’ (project milestones, draft PPA)
- 1.8 Despite this significant progress, ZAL and Northern Trust were unable to progress with the draft PPA because of the late exclusion of land off Gravel Hill Lane from the SADMP. Consequently, ZAL and Northern Trust could no longer agree with the reference to policy E2.1 forming part of the vision and objectives (appendix C, draft PPA) as the diagrams under policy E2.1 excluded land off Gravel Hill Lane, which ZAL and Northern Trust argued was, and remains, fundamental to the principles and viability of the policy.
- 1.9 The attached financial viability opinion is based on the work undertaken during the preparation of the draft PPA, IDP and Hardwick Interchange Strategy, which includes an indication of the scheme and timetable for phasing.

Appendices

- A. Area plan, February 2015
- B. Professional opinion on viability of plan, June 2015
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A. Area plan, February 2015



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KEY:

- Area 1
- Area 2
- Gas pipeline inner consultation zone (approx alignment)

All boundaries are approximate and subject to survey.

WEST WINCH	
AREAS PLAN	
1565/01	SK316 REV C
FEBRUARY 2015	Alan Baxter

B. Professional opinion on viability of plan, June 2015



STURT
& COMPANY

UNLOCKING VALUE FROM LAND

Professional Opinion on Viability of Plan

**Land at West Winch
Kings Lynn
Norfolk**

Prepared by

Richard Sturt, MRICS, FRGS, MSc, BSc (Hons)

19th June 2015

Contents

Page

1.0	Introduction	4
2.0	Principle	4
3.0	Qualifications	4
4.0	Argus Developer	5
5.0	CIL Viability Research	5
6.0	Modelling Assumptions	8
7.0	Development Scenarios	9
8.0	Conclusion	9

Appendices

1	Scenario A1
2	Scenario B1
3	Scenario B2
4	Global Assumptions

1.0 Introduction

- 1.1 Sturt & Company has been requested to provide a Commercial Viability Report in relation to the West Winch Partnership Allocation south of Kings Lynn. This document aims to highlight the key issues that face the entire project, including adjoining land as part of the submissions in connection with the Development Plan Document.
- 1.2 This report should be read in conjunction with previous submissions made by Maddox Associates and Urban Engineering Studios as part of the ongoing promotion of the site through the Development Plan process.

2.0 Principle

- 2.1 Please note that this report was prepared on behalf of Zurich Assurance Ltd (ZAL) and Northern Trust in respect of discussions with the Local Authority.
- 2.2 We have prepared this report using the principles of the RICS Guidance Note: Financial Viability in Planning.¹ We have had to make a number of financial assumptions in relation to the appraisal of the entire scheme and the associated scenarios. We reserve the right to review these costs and revenue with further research.
- 2.3 The appraisals are aimed to highlight the issues of viability facing the entire West Winch expansion area together with possible solution to contribute towards the delivery of the A10 relief road and other necessary highways work.
- 2.4 Please note this report and appraisals cannot be used for mortgage or funding purposes.

3.0 Qualifications

- 3.1 My name is Richard Sturt and I am a Member of the Royal Institution of Chartered Surveyors and have been active in the national development market for over fifteen years. Key clients have included the Homes & Communities Agency, Grainger, several charities, Primary Care Trusts and major institutional landowners. I am a RICS Registered Valuer and I assess candidates for the RICS Planning and Development Faculty in the role of Chairman of the APC panel.
- 3.2 I hold a degree in Real Estate management and am a Fellow of the Royal Geographic Society. Prior to setting up Sturt & Company I worked for Savills in their national Mixed-Use Development team. I also worked for the Commercial Agency team of Jones Lang La Salle and co-wrote the Metropole Report for three years.² Prior to this I worked for several years for Heritage Property

¹ Published 2012.

² Formerly King Sturge.

Group, developers based in Winchester specialising in historic town centre regeneration schemes across the country.

4.0 Argus Developer

- 4.1 In order to assess the viability of this scheme, I have used Argus Development software which is the leading software for the property development industry.
- 4.2 As an expert I am free to use any particular software package in the assessment of a scheme. This is clearly set out in the 2012 RICS Guidance Note: Financial Viability in Planning.

“The guidance note does not recommend any particular financial model (bespoke or otherwise) or provide indications as to inputs or outputs commonly used. It is up to the practitioner in each case to adopt and justify as appropriate”.

- 4.3 Argus is the leading property development software in the UK. Argus Software is used by 70 Local Authorities and Government Agencies. The Homes & Community Agency use this software themselves in order to justify Affordable Housing contributions on schemes they are promoting.
- 4.4 The use of Argus Developer software is often insisted upon by financial institutions, Government Agencies and investors who require software that has been independently audited and allows detailed analysis using a number of different functions.³
- 4.5 The benefits of Argus is that it allows the analysis of the scheme as an operated asset together with full sensitivity analysis which is not normally available on other basic Excel worksheets, such as the HCA Economic Viability Tool.

5.0 CIL Viability Research

- 5.1 In January 2015, West Norfolk Borough Council produced a CIL Viability Study which was published by HDH Planning & Development. This undertook a detailed analysis of the residential and commercial market in the sub-region and we have mirrored much of its modelling assumptions. At this stage we do not agree with all their figures and there are clear examples of some assumptions which are not truly “market facing” or reflect industry standards.⁴
- 5.2 Set out below is an extract that highlights the concern and importance of viability in major schemes such as West Winch.

³ The ARGUS Developer software has also been validated through Quality Assurance procedures across the world.

⁴ Such as the extremely low contingency of only 2.5% for many sites.

Kings Lynn and West Norfolk CIL Viability Study

We have given careful thought as to how major strategic sites should be treated as these large sites, by their nature, can have very significant infrastructure requirements that can have a dramatic impact on viability. Additionally, these large sites are a vital part of the Council's strategy to deliver its housing target – in some cases if the urban extension does not come forward then the Development Plan may be put at risk. The April 2013 CIL Guidance is clear saying:

Charging authorities may want to consider setting differential rates as a way of dealing with different levels of economic viability within the same charging area (see regulation 13). This is a powerful facility that makes the levy more flexible to local conditions. Differences in rates need to be justified by reference to the economic viability of development. Charging authorities can set differential levy rates for different geographical zones provided that those zones are defined by reference to the economic viability of development within them. In some cases, charging authorities could treat a major strategic site as a separate geographical zone where it is supported by robust evidence on economic viability.

We have read this with page 23 of the Harman Guidance which says:

Landowners and site promoters should be prepared to provide sufficient and good quality information at an early stage, rather than waiting until the development management stage. This will allow an informed judgement by the planning authority regarding the inclusion or otherwise of sites based on their potential viability.

The modelling and appraisals carried out in a high level strategic report such as this are going to be based on generic and borough wide assumptions. As the Plan progresses, the Council will need to work with the owners and or promoters of the sites that are perceived to have higher costs inviting them to contribute to the assessment process.

- 5.3 Any subsequent viability report for an individual planning application would have to address these issues and ZAL reserve the right to make further assumptions in relation to typical costs incurred by any developer.

*“The duty to test in the NPPF is a ‘broad brush’ one saying ‘plans should be deliverable’. It is not a requirement that every site should be able to bear all of the local authority’s requirements – indeed there will be some sites that are unviable even with no requirements imposed on them by the local authority. The typical site in the local authority should be able to bear whatever target or requirement is set and **the Council should be able to show, with a reasonable degree of confidence, that the Development Plan is deliverable.**”⁵*

⁵ See Section 2.4 of the Norfolk Borough Council CIL Viability Study; November 2013.

This test is further supported by paragraph 5 and 21 of the Planning Policy Guidance which states:

Para 21 - What factors should be considered when assessing achievability including whether the development of the site is viable?

A site is considered achievable for development where there is reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

Para 5 How should viability be assessed on plan making?

Local Plans and neighbourhood plans should be based on a clear and deliverable vision of the area. Viability assessment should be considered as a tool that can assist with the development of plans and plan policies. It should not compromise the quality of development but should ensure that the Local Plan vision and policies are realistic and provide high level assurance that plan policies are viable.

Development of plan policies should be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan’s policies and revised as part of the dynamic process.

Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability. Greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue – for example in relation to policies for strategic sites which require high infrastructure investment.

5.4 Section 7.0 of the Viability Study contains the key assumptions and set out below are an extract of its main salient points.

Item	Assumption	Council Evidence Reference
Agricultural values	Between £25-£50,000 per ha	Paddocks close to settlements are worth more (See 6.13)
Fees	10%	See 7.21
Interest Rates	7.5%	See 7.32
Profit	20%	On GDV see 7.47
Marketing	3.5%	Includes legals see 7.55

6.0 Modelling Assumptions

6.1 It is extremely difficult to accurately forecast the entire project of over 2,300 houses and it will be highly dependent on the rate of sales over the project. It is highly likely that the UK will be subject to another recession over this period. The CIL Study assumes 25 units per year per site which would be far slower than our own analysis. At this stage we have modelled the scheme on 5 phases over a 25 year delivery period.

- Five phases of between 300 - 480 units per phase depending on whether site F is included.
- 20% Affordable housing delivered at a lower profit margin than private housing.
- In line with the cost delivery plan, the infrastructure has been phased throughout the entire period in line with previous submissions to the Local Authority. These costs have been supplied by Urban Engineering Studios with input from the Local Authority.

6.2 Set out below are the key assumptions used in the appraisal of each scenario.

Assumption	Comment
Build Costs	£100 per sq ft
Private Sales	£200 per sq ft
Developer profit	20% on GDV
RSL Income⁶	£110 per sq ft
CIL	£30 per sq m ⁷
Finance Cost⁸	7.5%
Marketing and Sales Budget	3.5%
Build Cost Contingency	5%
Professional Fees	10% of Construction Costs
EUV of Agricultural Land	£11,000

⁶ Assume cost neutral per plot and blended over Social Rented and other intermediate types.

⁷ Whilst £60 is in the draft schedule other nearby Local Authorities have now agreed circa £30 which we have adopted. (such as Norwich)

⁸ NB Interest Rates are due to go up in 2015/2016.

- 6.3 I have allowed a profit margin of 20% on GDV which is supported by Planning Inspectorate decisions together with professional fees of no more than 10%.⁹ Overall these costs are relatively low compared to current industry standards and are an optimistic scenario especially as the proposed scheme is in East Anglia which is not a preferred location for development compared to London or the South East. We also note the CIL Viability Study allow for 20% profit on GDV.
- 6.4 Please note there has been no implied growth either in build costs or house price inflation over the period of the project.

7.0 Development Scenarios

- 7.1 We have undertaken a number of different scenarios to demonstrate the issues that face the West Winch extension. Set out below are the findings of individual scenarios together with key assumptions.

Scenario	Assumptions	Site F	Total Land Value	Land Value less EUV of Agricultural Land
A1	Current Plan affordable, CIL and all infrastructure ¹⁰	No	- £4,655,981	- £8,230,981
B1	Affordable, CIL <u>but no infrastructure</u> that can be paid by CIL	Yes	£10,169,279	£6,594,279
B2	Affordable, CIL but no infrastructure that can be paid by CIL	No	- £1,142,189	- £4,717,189

8.0 Conclusion

- 8.1 The development of the site is viable with the inclusion of Site F and when taking into consideration standard development obligations. The financial burden placed upon the scheme by the Council's desire to see it deliver a wide range of strategic infrastructure facilities and full affordable housing makes it unviable. As you can see with the full policy requirement of 20% Affordable

⁹ Fees up to 12% can be allowed as outlined in recent planning decisions by PINS. These levels are identical to the Local Authority's own CIL Evidence base.

¹⁰ Infrastructure costs for highway improvements have been included as a part of the total cost for area wide highway works, assuming proportional traffic impact from our scheme on the area as a whole.

housing and CIL the development (in Scenario B2) is still unviable and yields a negative land value.

- 8.2 Once the EUV of the land is taken into account two of these three scenarios do not reflect an adequate return for the landowners.¹¹ These sorts of figures are far below that required to meet the Benchmark figures to encourage a landowner to sell their land for development.
- 8.3 The current Affordable Housing Revenue is overly optimistic and following further research this is expected to provide a negative income for the project. This will need to be assessed in the future.
- 8.4 Without the inclusion of Site F there are concerns over the delivery of the entire housing allocation.
- 8.5 As demonstrated in Scenario B1, our opinion is that the strategic infrastructure has to be funded from Borough wide CIL or Public Sector sources. Without this the scheme cannot be expected to pay for these improvements on its own and remain viable.
- 8.6 It is vital that the adjoining Hopkins Homes site pays its share of the overall site infrastructure and the viability of both sites is assessed at the same time.
- 8.7 Without the addition of site F, which has been promoted over many years in the Local Plan Process, it is clear that it jeopardises the viability of the overall plan. Site F is a sustainable site close to existing services and is relatively easy to develop without requiring significant infrastructure.
- 8.8 However, the appraisals demonstrate there is a reasonable prospect of the plan being delivered if Site F is included. Consequently, it is highly likely that if Site F is not included, the Plan will not be delivered.
- 8.9 It is my professional opinion that the inclusions of Site F makes the overall plan viable and that without it, the plan is unviable.

¹¹ As outlined in the PPG NPPF and RICS Guidance Note.

C. Draft planning performance agreement, October 2014

WEST WINCH/NORTH RUNCTON GROWTH AREA

PLANNING PERFORMANCE AGREEMENT

Part 1

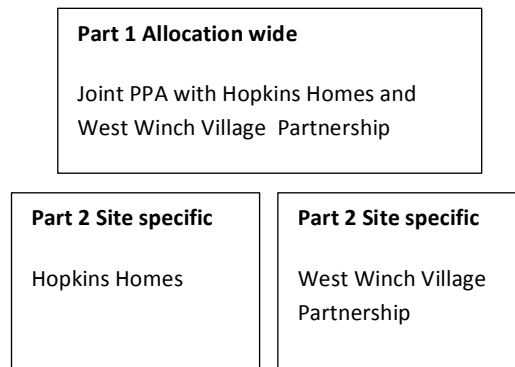
FRAMEWORK

October 2014

Introduction

The purpose of this Planning Performance Agreement (PPA) is to coordinate the timely delivery of development on land within the West Winch and North Runcton Growth Area (the Strategic Allocation Area) for housing and infrastructure through the planning process.

This PPA is in two parts – Part 1 sets the context for individual PPAs with the two major landowners in relation to delivery of their specific sites and related planning applications.



Joint Part 1 - Allocation-wide: strategic issues that require all landowners to work collaboratively with the Council to deliver a Framework Strategic Concept Plan, Infrastructure Delivery Plan (IDP) and high-level development plan viability appraisal in order to ensure a sound policy in the Detailed Policies and Sites Plan and deliver high-quality development and associated infrastructure in a timely way (i.e. role in both plan-making and development management). This is signed by the Borough Council of Kings Lynn and West Norfolk (BCKLWN), Zurich Assurance Limited (ZAL) on behalf of West Winch Village Partnership and Hopkins Homes.

Distinctive Part 2 - Site-specific: for shaping and determining planning application(s) relating to land within the Growth Area. These will be signed by (a) BCKLWN and ZAL on behalf of West Winch Village Partnership in relation to the West Winch site and (b) BCKLWN and Hopkins Homes in relation to the Hardwick Green site.

The PPA will establish a framework to manage the development process and sets out standards of service and expectations of the Local Planning Authority and landowners, but recognising that this agreement is not legally binding upon any parties and will not prejudice the decision making powers of the Local Planning Authority (LPA) when considering any planning application.

Planning applications cannot be determined positively until reasonable progress has been made with the outputs agreed in Part 1. However, having set the strategic framework for the Growth Area, the timetables for determination of current Hopkins Homes application and proposed ZAL application do not need to be dependent on each other so long as they conform to an Allocation-wide framework and IDP agreed above.

This PPA has been developed following discussions between all parties and supported by the Advisory Team for Large Applications (ATLAS).

Context

Policy

BCKLWN's adopted Core Strategy (July 2011) establishes an allocation of at least 1,600 new homes in the area south east of the town adjoining West Winch to contribute significantly both to current needs and also establish a direction of future growth to meet anticipated need beyond the current plan period.

The Council's draft Detailed Policies and Sites Plan (DPSP) provides for an allocation of 1,600 homes in West Winch and North Runcton Area (policy CS09). From the sites put forward during consultation, informed by the work of the Prince's Foundation, a total of 3,000 to 3,500 additional homes could be accommodated in this area in the fullness of time.

The policy and justifying paragraphs go on to provide content and further detail, including the requirement to prepare a Concept plan and Infrastructure Delivery Plan for the whole site. The Council anticipates submission of the DPSP in April 2015 with an EIP in summer 2015.

The West Winch and North Runcton Neighbourhood Area was approved in February 2013. West Winch and North Runcton Parish Councils (the Qualifying Body) have formed a Neighbourhood Plan Group (NPG) which has prepared a draft illustrative plan and draft policies on Community and Culture, Economy, Housing and Transport based on its work with the Prince's Foundation (see below).

Multi-ownership and Delivery

Land within the Strategic Allocation Area is owned by several landowners but is primarily in the control of ZAL representing West Winch Village Partnership and Hopkins Homes. There are no formal working arrangements between the landowning parties. The County Council owns part of the land (and is a partner within West Winch Village Partnership) and therefore has a dual role as service provider and landowner.

To help promote the land through the policy process and engage with the Parish Councils and local community ZAL funded the Princes Foundation to run an Enquiry by Design workshop in 2010. This work, and the resulting schematic masterplan, became the spatial basis for a proposed allocation.

Planning Applications

Hopkins Homes submitted an outline application for up to 1110 homes and associated community facilities in Oct 2013 (Reference 13/01615/OM). ZAL intends to submit an application in accordance with the Development Plan programme.

Scope of the PPA

Part 1 of the 'project' covers the Growth Area for development set out in the KLWNBC Core Strategy 2011 Policy CS03 and indicated on King's Lynn Diagram 1 (contained in Appendix 1). The Growth Area is supplemented by a Strategic Concept Plan attached to Draft Policy E2.1 West Winch Growth Area which will be formally published as part of the Pre-Submission Consultation Document in January 2015¹

¹ The process is intended to start by presenting the draft plan to Cabinet on 4 November 2014 and Full Council on 27 November 2014.

PART 1

Purpose

To agree a delivery strategy for those themes and issues that requires comprehensive consideration across different land ownerships. The intended outputs will be a Framework Masterplan; Infrastructure Delivery Plan, a high-level viability appraisal and a Statement of Common Ground to support the EIP process for the Examination of the Detailed Policies and Sites Plan. The aim is to demonstrate that development proposed within the first five years of the Plan Period is 'deliverable' and that development proposed in years 6 plus is 'developable'². While the adoption of the plan is a desirable milestone this is not within the control of the signatories to the PPA.

This PPA is intended to be a working document whose programme and task list will be updated and reviewed regularly as the project progresses.

There may be other strategic design issues that need to be discussed but fall outside of the intended outputs and may be covered by a simple design code, statement or similar. These include:

- Character and nature of the proposed new link road
- Treatment of the existing A10
- Design and management criteria for proposed strategic open space.

Project milestones

1. Completion of a draft Allocation-wide IDP identifying allocation-wide infrastructure requirements, costs and delivery plan agreed by all parties
2. Completion of an Allocation-wide Strategic Concept Plan agreed by all parties
3. Completion of a high-level Allocation-wide viability appraisal
4. Statement of Common Ground for Plan EIP agreed by all parties.

Tasks and timetable

The West Winch Timeline and associated Tasks is contained in Appendix 2. It will be expected that all parties make best endeavours to commit to the tasks agreed to meet the dates specified within the Timeline, unless otherwise agreed. The Timeline identifies strategic tasks which will require further breakdown and separate project group meetings.

² Footnotes to paragraph 47 of the NPPF states that to be considered 'deliverable', sites should be available now, offer a suitable location for development now, and be achievable with a **realistic prospect** that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. The footnotes continue to explain that to be considered 'developable', sites should be in a suitable location for housing development and there should be a **reasonable prospect** that the site is available and could be viably developed at the point envisaged.

Governance arrangements

The Project Delivery Group ³ will be responsible for taking forward the above work and securing the identified outputs in accordance with an agreed timetable, chaired and administered by BCKLWN Project Manager. While much of the work of the Group can be done electronically meetings will be set up as required by the Project Manager.

NB. Governance arrangements may need to be formalised and a Board established if funding is attracted from the Large Sites Infrastructure Programme. There has been no decision from DCLG to date regarding LSIP Local Capacity Funding.

Project Delivery Group

Alan Gomm, BCKLWN (Project Manager)

Hannah Wood-Handy, BCKLWN

John Clements, BCKLWN

David Maddox, West Winch Village Partnership

David Taylor, Urban Engineering Studio (Consultant for West Winch Village Partnership)

Phil Royston-Bishop, Urban Engineering Studio (Consultant for West Winch Village Partnership)

Graeme Warriner, Turley (representing Hopkins Homes)

Julia Wallace/ Graham Harrington, ATLAS

Other themed meetings with additional specialists may be convened as needed (eg on infrastructure costs, transport or landscape).

Stakeholder engagement

Statutory Agencies

Liaison with the Highways Agency, Natural England, Health and Safety Executive, Environment Agency and Norfolk County Council is likely to be required and will be coordinated through or by agreement with the Project Manager. Any meetings with statutory agencies should involve representatives from both the applicant and the Council.

Community

The outputs of the Project Delivery Group is intended, wherever possible, to draw together and reflect all existing technical evidence, local knowledge, vision and development objectives that have been previously set out and agreed by the community and NPG. The Framework Masterplan and draft IDP will be shared with the NPG once completed (see programme above).

Other

Liaison with the HCA over any Large Site Infrastructure Programme (LSIP) capacity funding bid, liaison with New Anglia Local Enterprise Partnership (LEP) and any necessary duty-to-co-operate liaison that may be necessary (BCKLWN officers to check).

³ Including Agents acting on behalf of landowners.

Members

Council officers will share with Parish, District and County Members for their consideration the draft IDP and Framework Strategic Concept plan (along with the draft DPSP). The Chairman and Vice-Chairman of Planning Committee and local ward Members will be briefed on progress.

Resources

There may be additional technical work that needs to be commissioned by the Council or landowners to support the allocation in the plan making process, such as an independent viability appraisal, that will be funded by the landowners. The scope and brief for any such work will be agreed by the Project Delivery Group. The Council has applied for Local Capacity Funding under LSIP and is currently awaiting a response on the bid.

Agreement

The Borough Council of King’s Lynn and West Norfolk (BCKLWN) and West Winch Village Partnership (WWVP) hereby agree to the content of this PPA1.

Borough Council of King’s Lynn and West Norfolk

Name:

Signature:

Position:

Date:

West Winch Village Partnership

Name:

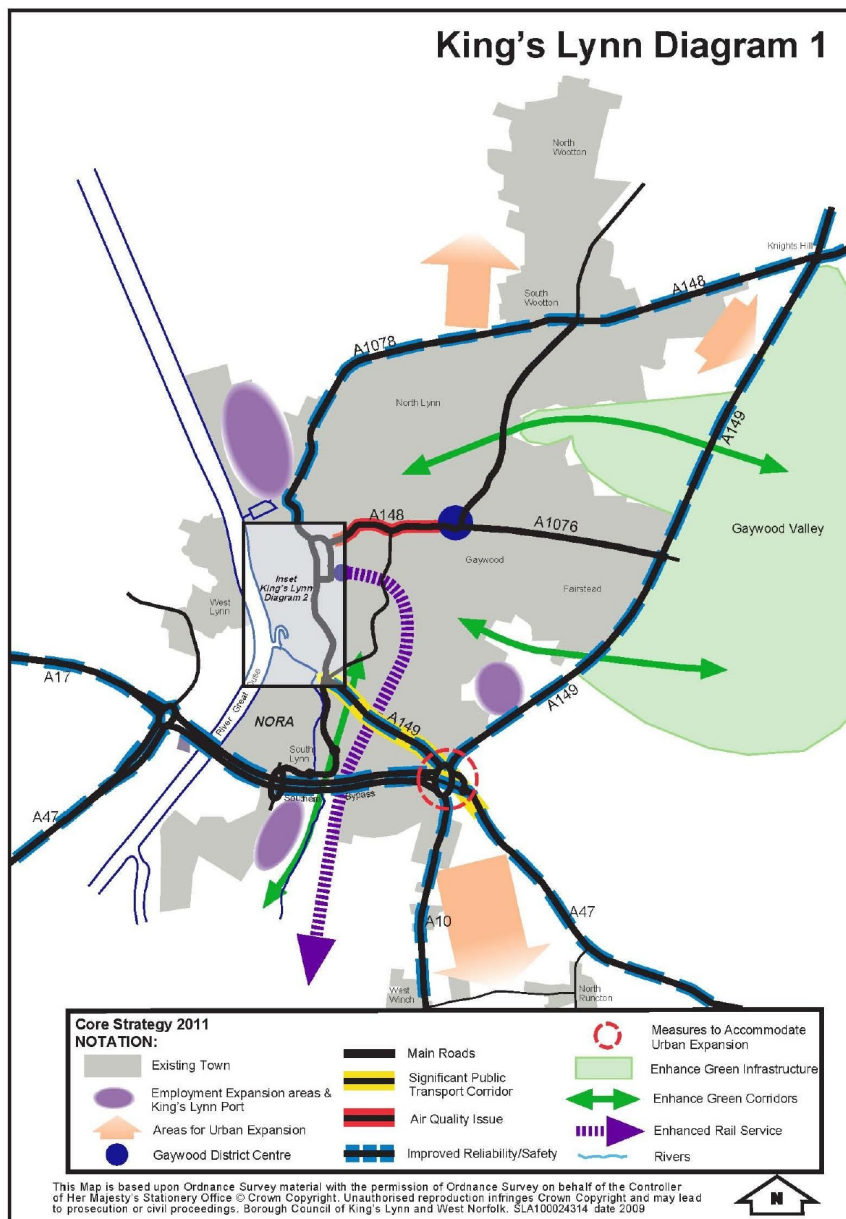
Signature:

Position:

Date:

Core Strategy Adopted Version July 2011

Figure 7



APPENDIX 2 - West Winch – Overall Timeline Template & Tasks

		2014												2015											
		F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
1	Detailed Policies & Sites Plan (DPSP)																								
a	Policy development																								
b	Evidence base development (borough wide Infrastructure Study)																								
c	Submission Version to Cabinet and Full Council including Strategic Concept Plan																								
d	Revisions between Cabinet and Full Council																								
e	Pre-Submission Consultation (including representations from individual parties)																								
f	Submission																								
g	SoCG (KLWNBC/HHL/WWVP)																								
h	Examination																								
i	Adoption																								
2	Collaborative Working (Plan-making & Development Management)																								
a	<i>LSIP bid (Capacity funding)</i>																								
	(i) Submitted application																								
	(ii) Further work required by DCLG																								
	(iii) Advise Partners of outcome																								
b	<i>PPA Part 1</i>																								
	(i) Circulate revised Draft PPA																								
	(ii) Agree with Partners																								
c	<i>Allocation-wide IDP and viability appraisal</i>																								
	(i) HH & WWVP to provide 1 st Draft																								
	(ii) KLWNBC to appoint professional advisors (legal/viability)																								
	(iii) HH & WWVP agree to contribute to cost of (ii)																								
	(iv) Independent Review of 1 st Draft																								
	(v) Feedback/amendments/briefing with Chairman/Vice-Chairman and share with NP Group																								
	(vi) Endorsement by Planning Committee																								

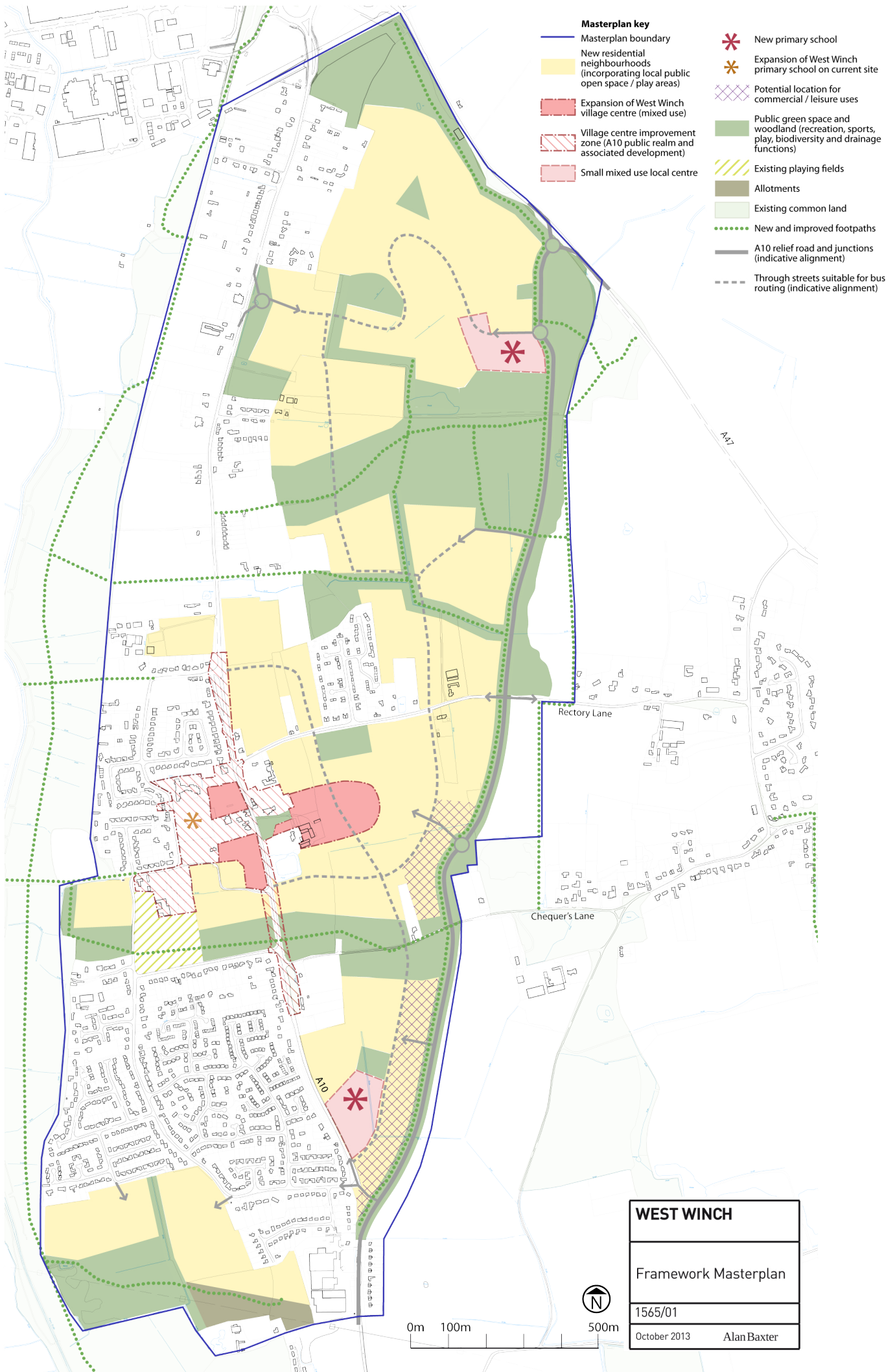
		2014												2015											
		F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
3	West Winch + North Runcton N Plan (for context)																								
	NP Group/HH/ZAL/KLWNBC Meeting																								
	Draft Policy Text																								
	Pre-submission Publicity + Consultation (tbc)																								
	Submission to KLWNBC (tbc)																								
	Examination (tbc)																								
	Referendum/adoption (tbc)																								

APPENDIX 3 - Part 1: Vision and Objectives for allocation-wide area

1. King's Lynn and West Norfolk Local Development Framework – Core Strategy 2011 – Policy CS03 King's Lynn Area.
2. Site Allocation and Development Management Policies Plan – Pre-Submission Document – Policy E2.1 West Winch Grown Area.
3. Community Engagement
Encourage community and landowner promotion of the growth strategy by creating an open and transparent consultation process through the concept plan and development plan document preparation.
4. Enquiry by Design workshop July 2010 – Key Themes:
 - Need to **alleviate traffic and speed along the A10** by creating **new linkages** across key arterial routes in South King's Lynn.
 - **Community Cohesion** between old and new • Enhance **village identity** and **character**. Keep **distinctive village** setting
 - **Sustainable transport links** into King's Lynn
 - Make most of **leisure** and **agricultural assets** and **biodiversity** of the area
 - Create **local centres** that are **accessible to all** and develop **local economies**
 - Develop **new skills** in growing industries
 - Improve **education** potential **for all**
 - Improve drainage by adopting and maintaining **Sustainable Urban Drainage Systems (SUDS)**
 - **Polycentric development** south of the Hardwick Roundabout to **minimise vehicular flows**
 - Need for a **masterplan** that is **holistic** and guides a **sequence of growth**
 - Need for **collaboration and consensus** between stakeholders
 - Need for a **landowner agreement** to ensure **holistic** and **strategic approach**.

ATLAS/BCKLWN Setpember 2014

D. Framework masterplan, October 2013



Six principles for growth at West Winch...

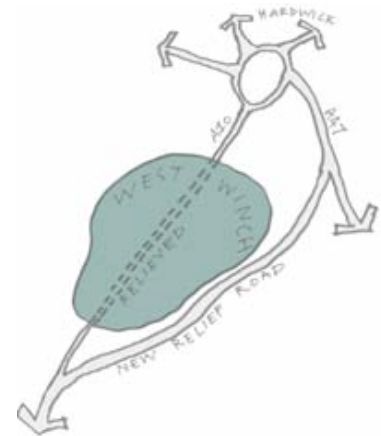
1. Growth from the centre

West Winch village is the only sustainable starting point for neighbourhood growth within the south-east growth area. The masterplan creates a cohesive settlement uniting old and new neighbourhoods, bringing historic buildings into use to consolidate the village centre, and integrating the western and eastern sides of the village across the A10. The availability of land right at the heart of West Winch is an unusual situation that presents a great opportunity to expand the historic village centre easily, and locate new walkable neighbourhoods right next to it. This scenario allows a gradual and sustainable expansion of West Winch into a larger village able to support a range of local shops and services.



2. Traffic relief for West Winch

A relief road will be constructed between the A10 and the A47 starting at the southern end of the West Winch, removing through-traffic and HGVs from the village. The significant reduction in traffic on the A10 through West Winch brings an opportunity to change the character of the road into a village high street, with multiple pedestrian crossing points and new buildings fronting onto it. The positive impact that this will have on the quality of life in West Winch is significant



3. A vibrant village centre

The historic village centre will be reinvigorated with the introduction of new facilities, shops and the removal of through traffic on the A10. A new street crossing the downgraded A10 will link west to east and connect together the existing village facilities, the William Burt Centre, the primary school, the shop and post office and St Mary's Church, with new infill development and high quality civic spaces for the community.

Making use of the existing green space outside the church as a 'village green' seems like an obvious idea for a central focal point which could have new cottages or businesses looking over it. ZAL owns derelict historic barn buildings close to the Church which we anticipate could be used for a distinctive community, retail or leisure use – farm shop, enterprise centre, micro-brewery, library or restaurant perhaps? The village centre will have a compact form and a mix of uses to bring vitality throughout the day such as local shops, restaurants, and high street services, varied employment spaces, community facilities and homes.



4. Creating great neighbourhoods



The concept masterplan promotes a mix of different house sizes, types and tenures to suit all sections of the market, and in particular a range of affordable housing types. To encourage diversity we suggest a number of character areas each with varied townscapes, densities, landscape treatments, streetscapes and functions, but all in harmony with the Norfolk vernacular.

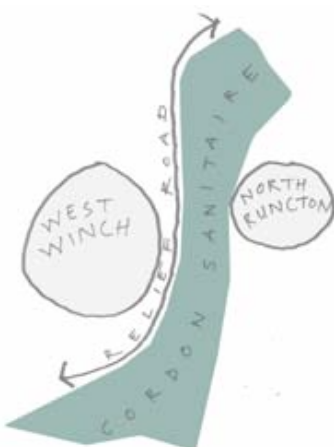
ZAL supports the highest levels of sustainable building to reduce energy use and improve quality of life.

5. Responding to the fen-edge landscape



West Winch has a strong relationship with the landscape and this is reflected in our plans. East-west green corridors will bring nature into the heart of the settlement and connect the Fens with the higher ground. Our concept masterplan suggests that around 25% of the total masterplan area could be made up of open spaces from natural areas (wetlands, woods, meadows and so on) to playing fields, allotments and children's play spaces, distributed throughout the neighbourhoods. Mature trees and hedgerows will be retained and integrated into the development wherever possible. A network of footpaths and cycleways will give access around the site, to the surrounding countryside and on to King's Lynn. We also suggest that an enhanced management regime for West Winch Common could be considered to improve biodiversity and increase recreational access.

6. Keeping North Runcton and West Winch separate



Allocating land for development in the way we propose will allow the creation of a green buffer or 'cordon sanitaire' between the two settlements, with a landscape treatment that echoes and continues north the character of North Runcton Common. The relief road will define the eastern edge of West Winch and will be edged by trees, hedges and raised banks which will form a clear landscaped boundary. The topography will be used to minimise the impact of the relief road along the edge of the settlement, potentially by partially sinking it into the slope, allowing key views from the higher ground to be maintained.

The two church towers of North Runcton and West Winch are landmarks and our concept plan shows how these will remain physically and visually connected by creating a new direct walking route between the two.