

King Lynn & West Norfolk Local Plan: Site Allocations and Development Management Policies EIP  
Representor : J R Maxey MA, FRICS, FAAV, Maxey Grounds & Co LLP  
on behalf of land owners at South Wootton  
Representation reference : 279  
Hearing Matter Number: Issue 3 - Broad Distribution of Housing (Section D.1)

1. This hearing statement is to address questions 3.1 to 3.3 and is further to representation 279 previously submitted.

#### Question 3.1

2. I represent a consortium of land owners to the west of South Wootton.
3. Policy CS03 intends 7510 new dwellings at Kings Lynn in the period 2011 to 2026 ( a 15 year period). In response to a verbal question at the E I P for the Core Strategy Mr Gomm indicated that it was envisage 1600 of these would be at West Winch, around 1000 at South Wootton and around 1000 at Knights Hill. Of these number CS09 commits the 1600 at West Winch
4. In the 2011 first draft Site Specific Plan these numbers were curtailed to 800 for South Wootton and 750 for Knights Hill
5. The later drafts have further curtailed numbers to 300 for South Wootton and 600 for Knights Hill.
6. Given the significant proportion of the anticipated delivery period (2011 – 2026) that has already past, without commencement of delivery, it is submitted that, particularly with regard to the largest allocation at West Winch, the risk that the full allocation will not be delivered within the plan period increases. There is only likely to be 10 years remaining by the time the draft site specific allocation becomes adopted, and a significant amount of infrastructure, including major highway works, to be provided prior to delivery. 160 - 200 units from that one area per annum for an 8 – 10 year period appears extremely optimistic.
7. For this reason it is submitted that additional flexibility in overall growth target is necessary, to seek to ensure overall scale of growth is delivered and to ensure the plan is not unsound by way of failing to meet targets.
8. Given it is acknowledged that the proposed allocation at South Wootton has potential for greater scale of growth, both by paragraph E3.13 and the original scale of draft allocation, it is submitted that adjustment of the number allocated to 500, without amending the area of allocation, will help address this issue. It represents only 5% increase in the overall scale of allocation, and is considered an appropriate additional buffer to help ensure delivery of the planned level of growth, particularly given the 5 year period between adoption of the Core Strategy and Adoption of this Site Specific part of the plan, which has effectively curtailed the plan period to its latter 2/3rds

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9. Given such a large proportion of the anticipated growth is at Kings Lynn, with a very significant part of that at West Winch, failures to achieve this growth will jeopardise the delivery of the plan. It is considered the risk is sufficiently high that, without a buffer figure, it makes the plan unsound.

#### Question 3.2

10. It would appear that the Council have sought to justify the allocations by way of examination of each site characteristics. They have been heavily influenced in respect of South Wootton by the comments of the Parish Council who have conducted a protectionist campaign seeking to divert as much development as possible away from their Parish, aided by adjoining Parshes, the number of District Councillors living within the Parish, and the parish Council have started work to produce a Neighbourhood Plan, as a further protection measure.
11. It would appear from discussions with, and representations from, the Parish Council that their preferred form of development would be 300 large executive detached houses in exclusive small groups. The Inspector will appreciate that this would not serve the development needs of the District, and the addition to the plan text of para E 3.13 acknowledging the scope for the allocation to accommodate greater numbers than 300, and potential additional later allocation, I would suggest to the Inspector, is the Council Officers' attempt to reconcile a number they recognise is too low for this allocation, with the political pressure not to increase it. It is clear by the insertion of this paragraph that the District Council are unlikely to have significant concerns if this allocation were increased as I propose. It is submitted that the views of the Parish Council, which has not taken into account fully the needs of the District, have been given undue weight.
12. I do not take issue with the general balance of development between the main settlements and the villages, but I do believe that there must be flexibility, for the reasons advanced in paras 6 and 7 above, given that the time remaining to the end of the plan period in which to achieve the proposed level of growth in the major allocations is being concertinaed into a 10 year period. My objection is on the basis that the distribution between allocated Urban Expansion areas is not sound or based upon the capacity of those areas, and the ability of those areas to deliver development within the remainder of the plan period

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### Question 3.3

13. The Council have clearly not adopted a consistent approach on density. The commentary on justification on many allocations (within Appendix 5) is they seek ensure the land use is optimised, and yet on many sites this is not the case, not least at South Wootton where an overall density of 3 per Ha is suggested by the numbers allocated. Accepting that around 25% of the site is Flood Zone 2 and thus will not be used for residential development on those parts, it is submitted that the residual land, whilst taking account of landscape features could accommodate at least 500 dwellings, as we propose the allocation is amended to.
14. Elsewhere in Outwell / Upwell one site at Isle Road of 2 Ha has a proposed allocation of 35, which is suitable, whilst another at St Peter's Road is restricted to 15 on the same size allocation. It is correct for the council to wish for an appropriate scale and density for the area. It is neither correct nor sound in terms of optimising land use, to restrict density to the extent they have. Separate submissions in relation to the allocations at South Wootton and Upwell deal specifically with site capacity and delivery.