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

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

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On behalf of J I Hall (ID. 208729)

### 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?*

1. We consider the plan is unsound and that it has failed to meet the requirements of the adopted Core Strategy, in addition to the requirements of the NPPF and NPPG.
2. The SADMP does not meet the Borough's full, objectively assessed need for housing; provide sufficient flexibility to adapt to rapid change; or allocate sufficient sites in the light of other sources of supply failing to come forward, which possibly have been overestimated.

#### *Objectively Assessed Housing Needs*

3. Whilst it is understood that the purpose of the SADMP is not to assess housing needs (Gladman Developments Limited v Wokingham Borough Council Case No: CO/1455/2014), in accordance with paragraph 158 of the NPPF each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence and take full account of relevant market and economic signals. The SADMP forms part of the Local Plan and thus every effort should be made to meet the Borough's housing and economic needs.
4. New evidence published since the adoption of the Core Strategy indicates that a higher provision of housing is required in the Borough. The SHMA Update (2014) estimates that approximately 690 dwellings per annum are required whilst the latest DCLG household projection figures indicate that between 680 and 710 dwellings per annum are required depending on whether or not 'Unattributable Population Change' is applied as defined in 'Assessing King's Lynn and West Norfolk's Housing Requirement (2015).'

5. As the Core Strategy target of 16,500 dwellings is a 'minimum' target and not a ceiling, the SADMP can meet the Borough's OAN whilst still complying with the Core Strategy. Indeed, it is assumed that the inclusion of 'minimum' within the existing Core Strategy was to ensure a degree of flexibility as discussed below.

*Incorporating Flexibility*

6. In accordance with paragraph 14 of the NPPF Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. It is not considered that such flexibility has been incorporated into the SADMP which is heavily reliant on windfall sites and the delivery of sites with outstanding planning permission to which there is a risk that these may not come forward.

*Windfall Sites*

7. In their Housing Trajectory (2014), the Council estimate that 228 dwellings per annum will come forward on windfall sites equating to the delivery 3051 new dwellings over the plan period. No evidence is provided to suggest this level of windfall dwellings will consistently come forward as required by paragraph 48 of the NPPF.
8. It is therefore our view that the SADMP needs to identify additional sites to ensure that there is a continual supply of suitable and available housing sites.

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

1. The Council's proposed approach to the distribution of development across rural settlements is considered unsound. In distributing housing proportionate to a settlements existing population, the plan fails to accord with NPPF and its presumption in favour of sustainable development.

2. It is considered that a hierarchical approach to development is too simplified and the impact the scale of development proposed on a settlement is just one of many considerations which need to be taken into account. In determining the level of development to be distributed, each settlement needs to be considered on individual merit taking account of other considerations such as:
  - (1) The levels of existing services and facilities in the village;
  - (2) The impact new development could have on supporting existing services and facilities;
  - (3) The location of the settlement in relation to the higher level services and facilities in the main settlements including the main transport hubs, secondary schools and hospitals.
  - (4) The role a settlement plays in supporting its surrounding community;
  - (5) Past delivery;
  - (6) Housing need; and
  - (7) The suitability, availability and deliverability of sites within and adjoining the settlement.
  
3. It is therefore considered that the Council should reevaluate how housing is distributed across rural settlements taking into account all of the above.