

Kings Lynn & West Norfolk Local Plan Review Examination

Hearing statement relating to Matter 2

Date of Hearing: 6th and 7th December 2022

Submitted by J R Maxey, Maxey Grounds & Co

Issue 2

Plan Period

Question 16

Our representation makes the point that by the time of adoption in 2023 there will only be 13 years remaining of the plan period and this is insufficient . As an absolute minimum the plan should look forward 15 years to 2038. We would support the merits of a special strategy looking beyond this as the Inspectors question, given the delivery lead in time of major development and the need to plan infrastructure. Some locational understanding of growth location and scale would assist in delivery. Our proposal was the plan should be at least until 2041 i.e. 20 years from the suggested Plan period start) with allocations scaled up accordingly.

Policy LP01 Spatial Strategy

Question 20

Given the spatial strategy identifies the Wisbech fringe within the definition of main Towns (even within document F18 response) and the importance Wisbech as a market town providing significant growth and serving the south west portion of the district, it is important to recognize this location both with regard to the Strategic Diagram and recognizing the importance to the local economy of Wisbech as an employment centre and the A47 as a strategic transport link through the district.

Question 24

Whilst the intentions of locating the majority of new development close to the major towns is understood, the lead in times of large allocations is more ponderous, and we would agree that a balance between the larger and smaller allocations needs to be found. Smaller developers are more nimble in delivering sites, and the preponderance of larger sites which are not accessible to smaller developers is delaying delivery evidences by the recent delivery rates shown on the housing trajectory.

Question 26

Our representations have clearly highlighted the inconsistency between the classification of North Wootton as part of the Urban Expansion area, but then not proposing an allocation of housing. The Plan needs to reflect clearly the intentions for this settlement.

Question 29

East Wisbech. We refer to our comments regarding Question 4 previously

Question 30

There are two Growth KRSC with a total allocation of 117 units (average 59 per settlement). There are 12 KRSC with total allocation of 740 (average 62 per settlement) The Plan gives mixed messages regarding scale of growth and, in relation to settlements with Neighborhood Plans, avoids any guidance of strategic level. This is not considered consistent with a sound Spatial Strategy or Settlement hierarchy. If settlements are selected for growth then this should be reflected in a meaningful scale of allocation particularly Watlington where the allocation is significantly less than most KRSC not selected for growth.

Question 32

The Inspectors have clearly appreciated the inconsistent language in relation to scale of development. It is suggested that the adoption of a criteria clearly understood, eg Minor development (ie up to 9 units) would enable greater clarity rather than undefined descriptive terms that are open to significant interpretation.

Question 33

Our representation make clear that in delegating all responsibility for allocation in settlements with Neighbourhood Plans the Council are failing in the need to deal with Spatial Strategy and Settlement Hierarchy. A scale of growth should be set for all settlements even if the site specific allocations are delegated to the Neighbourhood Plan.

Question 38

We refer to our comments under Question 20 which deals with the Growth Strategy.

Settlement Hierarchy

Question 39

In relation to West Walton and Walton Highway, these have previously been grouped as a KRSC for policy purposes, the evidence document D21 throughout classifies them as a single settlement, and yet the policy divides them, classing West Walton as the KRSC and Walton Highway which has the majority of housing commitments as a RV. These villages are a single Parish, with primary and secondary schools centrally located between them and equivalent other facilities. It makes most sense to continue to consider them jointly as a KRSC.

Policy LP05 Implementation

Question 49, 50, 51, 52

We have submitted representations regarding the Viability of development under both Policy LP05 and Policy LP28, and given the Inspectors' specific questions it is appropriate to summary our representation in addressing these. Our representations highlight our concerns regarding the Viability Assessment process the Council have adopted. Having engaged outside consultants they have undertaken one initial meeting in relation to the Pre-consultation draft, which received significant response and challenge from many including ourselves. Subsequent versions of the Viability Assessment have not sought further specific consultation responses, and the report now presented as Core Document D1 is considered to have many flaws and false assumptions leading to inappropriate conclusions. These include:

- The models used by the Consultant in typographies do not include the provision of or costing for any garages. The majority of developments would provide at the very least a single garage for each detached dwelling
- The models adopt a percentage of Basic build cost at far too low a level to reflect the cost of infrastructure provision.
- The April 2021 document, presented as a justifying report not a document for consultation in its own right, is now very out of date in terms of the values and costs it utilizes after a known 18 month period of very significant building cost inflation (BCIS General Build Cost Index has risen by around 20% in that period, and whilst house prices have also risen these are now adversely affected by the economic conditions and are likely to plateau or fall whilst costs continue to rise. This perfect storm has the ability to skew significantly viability of most development
- The conclusions of the report propose a single level of affordable housing provision across the district, notwithstanding that values between the lowest and highest priced areas of the district are very significantly different (some areas approaching double other)
- The same Consultant has advised Fenland District Council on viability in their District that the challenge to viability in the Northern part of Fenland, which has not implemented CIL, and which abuts the South Western Part of the West Norfolk area is such that Policy should be set at a lower level. It is clearly unsound to claim that a 20% proportion plus CIL can be viable on one side of an invisible political boundary but only 10% First Homes with No CIL on the adjoining street.

We would consider that the whole aspect of Viability has not been addressed openly or objectively by the Council, has not been the subject of full and proper consultation and has resulted in policies that do not appropriately reflect in the ability of development to make provision for affordable housing and other infrastructure.

We are happy to address these points in detail either under the above questions or under LP28 as the Inspectors prefer.

JRM 10/11/2022