

Kings Lynn & West Norfolk Local Plan Review Examination

Hearing statement relating to Matter 5: Issue 5 Growth KRSC and Watlington

Date of Hearing: 10th January 2023

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As a preliminary point to the Inspectors questions, 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, and this is the one settlement in the District that is not a town with alternative non road based transport via the rail station. This feature drove its selection as a Growth KRSC and should be reflected in the strategic level of growth identified for the village as required by para 20 of NPPF. As such we object to the proposed level of growth within the two Growth KRSC, but particularly Watlington, as not being sufficient given their status as part of the identified Growth Strategy within the Growth Corridor.

As a further preliminary point applicable to the majority of village allocations, the majority of settlements bring forward existing allocations, many of which are well progressed towards delivery already or in some cases completed. In such settlements (and we will make specific reference to examples in discussing allocations under those specific settlement points) those allocations will be delivered within the next very few years. Thereafter until a revised plan is approved, and for the remainder of the Plan period until 2039, there will be no supply within that village unless windfall sites come forward. It is submitted that this is not appropriate or sound policy – to effectively be relying on the larger strategic Town sites after the initial period of the plan, as this restricts the supply, type and choice of available development contrary to para 62 of the Framework. Village sites are popular and have been delivered – the supply figures over recent years would have been much lower without them, but these form a small proportion of the allocation strategy at present. Whilst there is logic to the strategy, it is essential to ensure there is and will be a sufficient supply for all settlements for the whole of the plan period.

Question 182 Is the Plan justified in allocating a single site for 32 dwellings at Watlington, given its status as a Growth KRSC, within the A10/main rail line growth corridor, and its range of facilities, including a railway station

Question 183 Should the Plan set a housing requirement for the designated Neighbourhood Area of Watlington to guide the preparation of the Watlington Neighbourhood Plan in line with paragraph 66 of the NPPF

The scale of growth for Watlington at roughly half the level for non-growth KRSC (on average) is clearly not compatible with its selection under the settlement Hierarchy as a growth village. Earlier stages of the plan identified significantly greater scale of development. There was no evidenced advanced at the earlier EIP hearings that Watlington had been wrongly selected for growth. It is suggested that given the special position as having a rail station, the scale of growth should exceed the level of other non-growth villages. It is suggested that a target of at least 100 for the village would be the minimum scale compatible with its designation.

Such a scale would be above the current level of the first draft neighborhood plan where the Parish Council have adopted the scale shown in the Plan. It is thus vital to achieve suitable growth that the Local Plan sets the strategic scale. The Framework clearly states that:

66. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

Part of the danger of the delegation in the plan of site allocation to neighbourhood plans is the risk of insufficient allocation to meet the strategic scale and thus under delivery of Housing numbers overall.

We thus consider not just for the Growth KRSC but for all settlements, the Plan needs to identify the strategy scale of growth for all settlements as a minimum figure, with scope for a contribution to unidentified windfall growth, under policy LP31 and LP 41 beyond that level if suitable opportunities exist and come forward.

In this settlement the existing allocation is already subject of an application (submitted 2021) and thus likely to come forward in the short term. As the application for Watlington is by Freebridge Housing, it is understood it will be predominantly affordable housing and thus providing very little market housing choice in the village.

If Inspectors agree that the scale of growth is unsuitable and request the Council to propose a modification identifying existing allocations the site owned by H L Hutchinson Ltd west of Glebe Avenue of about 0.35 ha would form a suitable allocation for at least 5 dwellings and potentially up to 10 dwellings, as an extension of previous development, within walking distance for the village centre, station and all facilities, and would have the added benefit of being suitable to be brought forward potentially as a self-build site, given the absence of any allocation for such form of development, the additional weight the Council seem to imply in favour of such sites, the encouragement in the Framework para 62 for a sufficient supply of such housing and in para 69a for sites of less than 1Ha to form at least 10% of allocation.

Whilst appreciating that it is for the Council to propose suitable additional sites, it is appropriate at this stage to identify that there is a supply of such suitable sites available and deliverable within suitable locations in the settlement, as part of the discussion on suitable strategic scale.

JRM

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