

**Representation Form**

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20<sup>th</sup> October 2023**

**Part A**

**Section 1: Personal Details**

<b>Title:</b>	Mr
<b>First Name:</b>	John
<b>Last Name:</b>	Maxey
<b>Job Title (where relevant):</b>	Consultant
<b>Organisation (where relevant):</b>	Maxey Grounds & Co
<b>Address:</b>	[REDACTED] [REDACTED]
<b>Postcode:</b>	[REDACTED]
<b>Telephone:</b>	[REDACTED]
<b>Email:</b>	[REDACTED]

**Section 2: Agent Details (if applicable)**

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	N/A
<b>Address:</b>	
<b>Postcode:</b>	
<b>Telephone number:</b>	
<b>Email:</b>	

## Part B

Please fill in a separate form for each document

### Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F50a	Housing Trajectory	See Below

#### Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

I do not agree with the use of 299 Windfall dwellings per annum for the following reasons. Para 28-32 of the Re-consultation document refers

Whilst the Council have adopted a 25% discount on the average numbers of windfall dwellings for the previous 20 years, I have no confidence that number will be forthcoming for the following reasons.

Except where a five year land supply issue leads to windfalls outside the designated development areas (as occurred in 2017) generally windfalls occur within a finite land boundary within the development areas. New allocations as settlements expand generally to not create new windfall opportunities – these are found by redevelopment within the established settlements or subdivision of larger properties. As this finite land supply produces windfall development it is exhausted as a windfall source, and the pool of potential windfall land reduces. One would thus expect a diminishing rate of windfall over time.

A five year land supply issue occurred in 2017 which lead to a plethora of additional quite large scale consents being granted in under a year. Some of those consents are still active and contributing to the identified 2647 Extant consents on non allocated land (Updated Housing Supply document para 23.). We are of the view that the average number of windfall consents is significantly inflated by this five year land supply issue from 2017.

The scale of future windfall sites is likely to be smaller. In villages proposed LP02 will limit such sites to 10 units or lower. Past windfall consents were not limited in this way.

For these reasons we consider that the anticipated discount on past windfall supply is not sufficient. All of the above factors are likely to further limit windfall supply. Without the Windfall proportion there is a likely shortfall on anticipated supply and any buffer disappears. Given

elsewhere we have commented on the needs to roll forward the plan to 2040 to give a 15 year period after adoption, the buffer is further squeezed in any case.

Our conclusions are that it is unsafe to rely so heavily (to the extent of 33% of all housing) on windfall. Our view would be that additional allocation of sites is required to enable the plan to be considered sound.

(Continue on a separate sheet if necessary.)

**Please note** you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

#### Section 4: Examination Hearings

This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? *(Please select one answer)*

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the examination hearing

#### Section 5: Data Protection

Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?

Schedule of Main Modifications stage (following hearings)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of Inspector's Report	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Adoption of Local Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

*In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.*

*When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at [lpr@west-norfolk.gov.uk](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.*

#### Section 6: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	<i>J R Maxey</i>
Date:	<b>18/12/2023</b>

Please note that, to be considered, your representation will need to be received by **11:59pm on Friday, 20<sup>th</sup> October 2023.**