



**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>	
<b>First Name:</b>	
<b>Last Name:</b>	
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	<b>Barratt David Wilson</b>
<b>Address:</b>	<b>c/o Agent</b>
<b>Postcode:</b>	
<b>Telephone:</b>	
<b>Email:</b>	

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

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

<b>Agent name:</b>	<b>Carter Jonas</b>
<b>Address:</b>	<b>Brian Flynn Carter Jonas One Station Square Cambridge</b>
<b>Postcode:</b>	<b>CB1 2GA</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)
F50	Updated Housing Land Supply – April 2023	

#### 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.

Barratt David Wilson (BDW) has an interest in land west of Knights Hill, Grimston Road in South Wootton, which is allocated in the adopted Site Allocations and Development Management Policies Plan 2016 (SADMP) for at least 600 dwellings (see Policy E4.1). In July 2020 outline planning permission was granted on appeal for up to 600 dwellings at the site (Appeal Ref. APP/V2635/W/19/3237042). A reserved matters application for 574 dwellings has been submitted and is under consideration (22/01310/RMM).

In summary, these representations to Doc Ref. F50 highlight the fact that the BDW site at Knights Hill is included within the housing land supply, but is excluded as an allocation in the submission version of the King's Lynn & West Norfolk Local Plan Review (draft KLWNLPR), which represents an inconsistent and unsound approach when compared to other sites with a similar planning status i.e. allocated in an adopted development plan and with outline planning permission. These matters were raised in BDW's Matter 5 Hearing Statement, and remain unresolved in this current consultation, which is why they are restated in these representations.

Doc Ref. F50: Updated Housing Land Supply (April 2023) and Doc Ref. F50a: Appendix A Housing Trajectory Update April 2023 identify the sites that contribute towards the land supply during the plan period to 2038/39. The land at Knights Hill is included in the housing land supply for 600 dwellings, with dwellings delivered between 2028/29 and 2036/37 – see pg.13 of 18 in Doc Ref F50a. As set out above, the land at Knights Hill is allocated in an adopted development plan document, it has outline planning permission for 600 dwellings, and a reserved matters application has been submitted for the proposed development. The reserved matters application has been submitted by BDW, the housebuilder that would deliver the proposed development. It is very likely that development at the site would commence much earlier than predicted in the housing trajectory. The proposed development on land at Knights Hill would fall within the definition of 'deliverable' within the NPPF e.g. it is available now, it is a suitable location for

housing, it has outline planning permission, it is allocated in a currently adopted development plan, and it is controlled by a housebuilder that is actively seeking to deliver the proposed development. It is anticipated that the delivery of housing at the site would commence within the current five year period 2022/23 to 2026/27. It is entirely appropriate for the land at Knights Hill to be included in the housing trajectory contained in Doc Ref. F50a, and this is supported by BDW. No additional modifications are requested.

However, it remains unclear why the Council, having included the land at Knights Hill within the housing trajectory, did not take the next logical step and reallocate the site in KLWNLP. The decision to not reallocate land at Knights Hill represents an inconsistent and unsound approach when compared to other sites with a similar planning status. It is acknowledged that the Inspector asked a specific question about whether the Knights Hill site should be identified as an allocation in KLWNLP (see Qu.142 of Matter 5), but the Inspector's findings on this matter have not been published and it remains unclear whether the site will be allocated or not. For this reason, the case for the land at Knights Hill to be reallocated in KLWNLP is restated, as set out in BDW's Matter 5 Hearing Statement.

The land at Knights Hill is allocated in SADMP for at least 600 dwellings (see Policy E4.1) and outline planning permission has been granted for a residential development that is consistent with the site allocation. In June 2022 reserved matters were submitted for the proposed residential development at Knights Hill. The Council is well aware of BDW's intention to deliver site allocation Policy E4.1 and to implement the planning permission for land at Knights Hill once reserved matters are approved. The draft KLWNLP seeks to carry forward most of the adopted site allocations in SADMP that have not been implemented. For example, land at Hall Lane in South Wootton was allocated in SADMP (Policy E3.1 for at least 300 dwellings), has two outline planning permissions for residential development covering different parts of the site, has reserved matters approval, and is carried forward as an allocation in draft KLWNLP. The Hall Lane site represents all of the 575 dwellings allocated for South Wootton (see table for Tier 3 at pg.51 of Doc Ref. F47) and is included in the housing trajectory (see Site Ref. E3.1 at pg.2 of 18 of Doc Ref. F50a). It represents an inconsistent approach to carry forward one allocation from SADMP (Land at Hall Lane) into draft KLWNLP, but not carry forward another site (land at Knights Hill) with a similar planning status i.e. allocated in an adopted development plan and with outline planning permission.

This approach does not meet the justified soundness test because it is not an appropriate strategy to treat two sites with a similar planning status differently, to not carry forward a previous allocation that is deliverable, and to include a site within the housing trajectory but not identify it as an allocation. Therefore, a consistent approach to site allocations should be applied, and site allocation Policy E4.1 (Knights Hill in South Wootton) from SADMP should be carried forward as an allocation into KLWNLP.

As set out in BDW's Matter 5 Hearing Statement, it is requested that Policy E4.1 and the supporting text contained in Section 9.6 of the 2019 Draft Consultation document should be used as a basis for the allocation of land at Knights Hill in a main modification to KLWNLP, with

updates on the planning status of the site with reference to the outline planning permission and reserved matters.

(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)	Carter Jonas on behalf of Barratt David Wilson

<b>Date:</b>	<b>18/10/23</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.**