



Representation Form

Consultation on additional evidence base documents, September 2023

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

Part A

Section 1: Personal Details

Title:	Mrs
First Name:	Lynn
Last Name:	Devereux
Job Title (where relevant):	Chair
Organisation (where relevant):	
Address:	Type text [Redacted]
Postcode:	[Redacted]
Telephone:	[Redacted]
Email:	[Redacted]

Section 2: Agent Details (if applicable)

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

Agent name:	N/A
Address:	
Postcode:	
Telephone number:	
Email:	

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)
F47 and F47A	Spatial Strategy and Settlement Hierarchy	

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.

Please see attached

(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 YES

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"/> Yes	No	<input type="checkbox"/>
Publication of Inspector's Report	Yes	<input checked="" type="checkbox"/> Yes	No	<input type="checkbox"/>
Adoption of Local Plan	Yes	<input checked="" type="checkbox"/> Yes	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 or 01553 616200.

Section 6: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	
Date:	20 Oct 2023

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

1 F47a (Appendix 1 Settlement Hierarchy Assessment)

1.1.1 The use of an objective scoring system for establishing the settlement hierarchy is supported and it is accepted that there needs to be some flexibility for dealing with situations where the objective indicators lead to anomalous conclusions.

1.1.2 However, not all the indicators appear helpful in discriminating between settlements and the weights attached to some of the scores are inconsistent. For example, almost everywhere has potential access to a mobile library and a church so these are not good discriminators of status. Access to an hourly, local bus service attracts a scores of 3, whereas hourly rail services providing access to the opportunities offered by some of the most economically buoyant centres in the UK (including London and Cambridge) only scores a 1. This scoring underestimates the importance of the most sustainable transport links.

1.1.3 The proposed distribution of housing deviates from the settlement hierarchy because Tier 4 in the hierarchy (Key Rural Service Centres) receives more growth than Tier 3 (Settlements adjacent to Kings Lynn and Main Towns) but Tier 3 surely has higher levels of accessibility and service provision?

1.1.4 The title for the revised Tier 3 is now misleading because there are no relevant settlements adjacent to the main towns of Hunstanton and Downham Market. This requires explanation or a change of title.

1.1.5 The Tier 3 settlements are not scored in the Table provided at Appendix 1 so it is not straightforward (possible?) to see how their level of development is justified. This needs clarification.

1.1.6 As it stands it is not clear that the evidence provided supports the proposed settlement hierarchy and whether the proposed distribution of housing across the hierarchy is justified - especially in relation to Tiers 3 and 4 and settlements with access to rail services.

2 F47 - Topic Paper Spatial Strategy and Settlement Hierarchy (including Neighbourhood Housing requirements)

2.1.1 The rationalisation of policies LP01, LP02, LP04, LP31 and LP41 is welcomed as a major improvement. However, revised policy LP01 has a long introduction some of which is repeated in the policy statement. It would help to improve the clarity of the policy still further by removing repetition and shortening the text if possible.

2.1.2 The Inspectors expressed concern that the proposed 'Strategic Growth Corridor' was not justified by the proposed pattern of development. The Council's response has been to delete references to the 'Strategic Growth Corridor' without significantly altering the pattern of development. This does not change the reality that the A10 is a strategic, multi-modal transport corridor that offers fast and sustainable rail access to some of the fastest growing economies and related work opportunities in the UK (especially Cambridge North 48 mins, Cambridge 55 mins and London 1 hr 58 mins).

2.1.3 Failure to exploit these links is surely a huge, missed opportunity to bring income into the Borough and contribute to much needed economic growth and regeneration via the multiplier effect?

2.1.4 The proposed alternative of relying largely on a single, very large allocation at WWGA that looks mainly towards Kings Lynn and which would need a step change in economic performance to support the proposed growth in households has not been justified. Further, notwithstanding the commentary surrounding the transport modelling, all of the models presented show that the impact of the WWGA will be to add to congestion on the highway network – especially to the North of Hardwick on the Queen Elizabeth Way/A149 Corridor.

2.1.5 Funding and timescales for the WWHAR are currently uncertain and although the highway scheme reduces existing congestion on the A10, levels of congestion in the wider network remain high; the problems on the Queen Elizabeth Way/A149 persist; impact on access to the QE Hospital is a concern and increased emissions and reduced air quality seem inevitable. The impact of the development on the A149 to the north of Castle Rising (the main coast road) has not been considered but access to the coast is vital for Hunstanton and the Borough's tourist economy and congestion on this road in the holiday season is already severe.

2.1.6 It has not been demonstrated that the WWGA as currently proposed represents 'growth within the most sustainable locations' within the Borough and nor has it been shown to make 'the most of existing services and facilities' as suggested in the Policy.

2.1.7 Planning for a more balanced pattern of growth along the A10 Corridor linked to the railway line, as implicitly suggested by the Inspectors' letter, offers the possibility of a more sustainable solution which, with careful phasing, could reduce the risks associated with funding highway improvements and get road traffic off the network, reduce congestion and provide a better, more sustainable access to Kings Lynn Town Centre. This need not rule out the development at West Winch but would require a longer term vision for the WWGA.

2.1.8 The LPA could consider adopting the type of development model provided by Cambridge North as an 'Urban Gateway' settlement with mixed use and also that provided by the emerging multi-modal public transport 'Sustainable Travel Hub' at Waterbeach new town – both in the A10 rail corridor. The spatial strategy for the Borough would benefit from a vision of how it might complement and benefit from these new, technology focused developments via its existing rail links (Downham Market to Waterbeach just 30 minutes).

2.1.9 The spatial strategy will deliver 12,681 houses of which 9,675 remain to be delivered during the plan period after subtracting commitments and completions. Of this number 5489 are allocated and 4186 (ie 43%) are expected to come from windfall. Based on past performance this level of windfall housing could doubtless be achieved. However, the overall scale and expected contribution to growth is very large when there is no certainty about where this housing will be delivered, how it will relate to employment opportunities and service provision (and indeed the settlement hierarchy) and how it will satisfy local housing need (see comments on LP02 with respect to second homes).

2.1.10 Furthermore, there is no clear understanding of what impacts this might have on the transport network or the environment. Of particular relevance, the transport modelling (Paper F48) appears to distribute windfall as 'background growth' across the wider network and as a result there can be no guarantee that the models will identify where congestion is likely to occur.

2.1.11 Regeneration is a main issue facing Kings Lynn while the sensitive environmental areas in the north of the Borough are under immense development pressure for second homes and tourism (evidenced by differential CIL rates). In these circumstances it seems very likely that proposed windfall

housing will be attracted to the north of the Borough and this will be difficult to manage in the absence of a policy for dealing with these pressures.

2.1.12 As the plan currently stands there appears to be a significant risk of

- i) generating a large amount of unsustainable windfall development in the environmentally sensitive northern parts of the Borough
- ii) failing to maximise opportunities for revitalising Kings Lynn Town Centre and
- iii) depending on a new settlement at WWGA that either can't be delivered due to inadequate transport infrastructure or which will be delivered at huge cost in terms of congestion (travel time costs) and emissions.

2.1.13 It was argued at the hearing sessions that there was a need for more development in the more sustainable locations of Watlington and Downham Market and that there was a supply of potential sites to support this. However, this possibility does not appear to have been followed up.

2.1.14 In conclusion, acknowledging that there is a long-standing commitment to growth at WWGA, the Inspectors are urged to ask the LPA to:

- i) Recognise the rapidly changing economic and development landscape of the wider region and the opportunities this offers for development in the Borough – especially in the A10 transport corridor.
- ii) Assign a significant proportion of the windfall element of Borough-wide housing growth to the A10 Corridor.
- iii) Include a policy statement based on this number that makes a commitment to identifying new allocation sites which take advantage of the sustainable development opportunities offered by the transport corridor.
- iv) Develop a masterplan/vision for the WWGA/Watlington/Downham Market axis that brings together housing, jobs and leisure facilities and capitalises on the ongoing economic growth in the corridor to the south in order to attract much needed exogenous income into the Borough and specifically to support regeneration initiatives for Kings Lynn.
- v) To ensure that the Masterplan makes provision for phased development based on sustainable public transport/active travel options which reduces immediate dependence on the WWHAR and the overall risks associated with delivering the Local Plan.

3 Policy LP02: Residential Development on Windfall sites within and adjacent to Rural Settlements

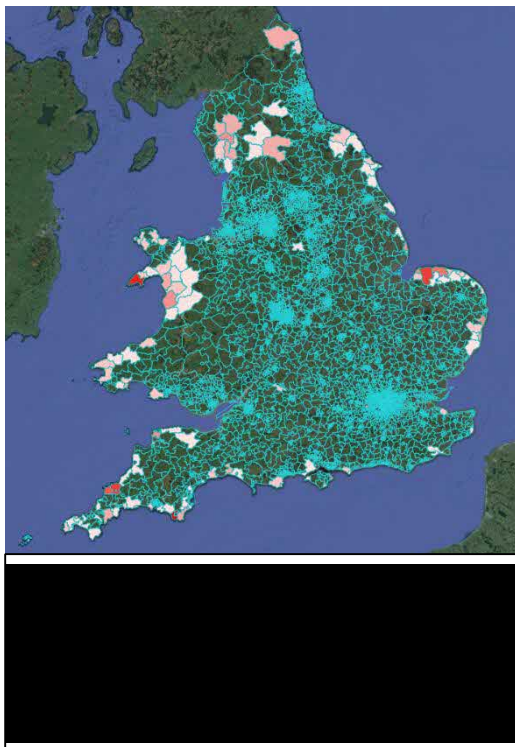
3.1.1 Policy LP02 makes provision for windfall development on sites 'within and adjacent to' rural settlements. It has emerged from rationalisation of Submitted Plan policies (LP01, LP02, LP04, LP31 and LP41) and in terms of clarity it is a major improvement. However, in its current form it gives rise to some serious concerns.

3.1.2 In particular, in the Submitted Plan, windfall development within and adjacent to development boundaries for settlements that are (i) inside the AONB or (ii) which have an adopted neighbourhood plan was excluded. Under the proposed modifications it is permitted.

3.1.3 As noted previously, the Submitted Plan makes provision for 4,186 windfall houses - 43% of all new development (excluding completions and commitments) during the plan period. Table 1 sets out how this is to be 'distributed amongst the Tiers of the Settlement Hierarchy according to the proportion of growth expected over the Plan period from housing allocations'. However, the location of windfall development is, by definition, unpredictable and whilst the distribution shown in Table 1 might be desirable, there appears to be no mechanism for ensuring that it is realised.

3.1.4 As also noted previously, it can reasonably be expected that the lion's share of this windfall development will come forward in the environmentally sensitive northern and coastal parts of the Borough - including within the AONB and close to Protected Sites.

3.1.5 Evidence of the development pressure in these areas is to be found in the 2021 Census which recorded dwellings used as second addresses. Mapping this data shows that North West Norfolk



stands out nationally with its concentration of second homes. The MLSOA of Brancaster, Burnham Market & Docking ranked only second to South Hams in the national league table. Hunstanton and also Heacham & Snettisham followed close behind.

3.1.6 When holiday lets are added into the equation, the AONB parishes in the north of the Borough are typically finding that 50-70% of their housing stock is no longer accessible to the local population as they cannot compete with second home and buy to let owners in the housing market.

3.1.7 As a result of the huge profits to be made from speculative development in these locations, agricultural land adjacent to the settlement boundaries of many villages is already being divided into small plots and sold off in anticipation of future development opportunities.

3.1.8 Despite Neighbourhood Plans trying to introduce policies to address this problem there is no strategic policy in the Local Plan to support local communities and get them back onto a sustainable footing. Not only is the vitality of these communities depleted but the viability of some is now threatened.

3.1.9 Against this background, the effect of policy LPO2 will be to further encourage speculative housing development in the smaller, rural AONB settlements. The policy will do nothing to address local housing need and given the potential number of windfall sites available will eventually distort and undermine the settlement hierarchy.

3.1.10 Added to this, the concept of development outside but adjacent to development boundaries appears to be inherently contradictory as well as confusing. Surely the role of a development boundary is to accommodate growth and direct development to a sustainable sustainable locations. Preparation of the Submitted Plan has involved designing and consulting on a large number of development boundaries which one might hope have been drawn to accommodate the growth needed by the Borough. Having a policy which then suggests these boundaries might not be able to fulfil this function implies that the boundaries have not been correctly designed in the first place. Surely, it would be

better to adjust the boundaries to accommodate the required growth than to allow growth beyond them? It would certainly simplify the policy.

3.1.11 For the SVAH's such as Holme-next-the-Sea, Policy LP02 permits up to two houses per site outside the development boundary. It is clear from experience that controlling cumulative impacts particularly where small numbers are involved (1-2) is very difficult. Each successive development sets a precedent for the next. As the policy provides for no upper limit on the number of sites it will almost certainly lead to an unsustainable pattern of unplanned (speculative) development in the countryside. This will erode the special qualities of the AONB landscape and will have unintended environmental consequences. No justification or explanation for this aspect of the policy is provided.

3.1.12 We would question the lawfulness of this policy in the context of the Localism Act and Neighbourhood Planning Guidance which states that "Neighbourhood planning gives communities direct power to ... shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built....," (Paragraph: 001 Reference ID: 41-001-20190509) - with the proviso that NDPs must accommodate a quantum of housing based on the requirements of strategic policies in the Local Plan. Policy LP02 removes the ability of qualifying bodies to decide where development should go in Designated Neighbourhood Areas.

3.1.13 The Parish Council strongly objects to this policy and can see no justification for it. At the very least we would like to see reinstatement of the clauses in the Submitted Plan policy LP31 which were designed to protect both the AONB and those Parishes with made Neighbourhood Plans.

4 Policy XXX: Neighbourhood Plans

4.1.1 This new policy sets out minimum housing requirements for neighbourhood areas as required by the NPPF. The requirement is defined as the sum of any allocations in the neighbourhood area plus a proportion of windfall development based on the position of the DNA in the settlement hierarchy and the proportion of households it contributes to the Tier (specified in an algorithm included in the Appendix).

4.1.2 The PC's comments on LP02 note that there is no guarantee that this mechanism will deliver the 'required' development according to the numbers specified. This has implications for the five year housing land supply given that such a high proportion of the proposed housing development relies on windfall (43% of the remaining 9,675 dwellings after deducting commitments and completions).

4.1.3 How will this policy work in practice? Are parishes with neighbourhood plans expected to allocate sites for the specified number of dwellings or can they simply wait for sufficient planning applications to come along? For the settlements that don't have neighbourhood plans how will the process work? Will permissions be given to a point where the minimum plus an allowance is met and then further applications refused because permissions are in excess of the stated target or will permissions continue to be given at risk of distorting the settlement hierarchy. Explanation and greater clarity is needed.

4.1.4 The PC also notes that the figures for Holme-next-the-Sea Neighbourhood Area appear to be incorrect. Although Holme was advised by the BC that it had a target of zero dwellings for its Neighbourhood Area, the community chose to design a development envelope with scope to

accommodate more and also made an allocation of five small principal homes. This is because it felt it would get the development it wanted/needed and not the inappropriate development that was otherwise taking place.

4.1.5 It is suggested that the policy could be worded more positively to encourage communities to take a lead in promoting sustainable development within their neighbourhood plans and this would contribute to achieving both housing targets and the kind of development that addresses local housing need.