

Kings Lynn & West Norfolk Local Plan Review Examination

Hearing statement relating to Matter 2 Spatial Strategy : Question AQ117 & AQ1

Date of Hearing: 26th March 2024

Submitted by J R Maxey, Maxey Grounds & Co

1. The Councils published Local development Plan timetable predicts adoption between April and June 2025.
2. Para 22 of NPPF requires Plans on adoption to look forward at least 15 years. This suggests the Plan must run to at least the end of the Council year March 2041.
3. This is 2 more years than the current proposed end date of March 2039, with implications for Housing need and target development figures
4. We look to the Inspectors to require for the plan to be sound and the Council to accept that the plan period should be rolled forward to March 2041.
5. Should the Council be unwilling to roll forward to that extent, then the plan will automatically be unsound, and if that were to be the case, the EIP should be halted and the plan abandoned and restarted.
6. The original Plan was to 2038 and proposed a housing target of 10780. Revised need numbers meant a revised target of 10278 based on 18 years of 571 dwellings following modification
7. The implications of rolling forward by 2 more years are an additional housing requirement to March 2041 meaning a total period of 21 years and a revised target of $21 \times 571 = 11991$. This is an increase of 1211 dwellings on the original Plan provision.
8. Whilst the Draft Plan stated a planned provision of 12057 (para 4.1.7) and with windfall up to 16100 (para 4.1.11) target numbers should be planned for, with a suitable buffer. 66 additional planned dwellings is not sufficient buffer.
9. I would submit that at the very minimum there should be an increase in planned allocation of at least 2×571 dwellings ie 1142 additional allocations to maintain the necessary buffer at around 10% on the same basis as the Submitted Draft Plan, rather than rely on windfall numbers. The introduction of BNG is an added constraint and threat to delivery of numbers on most sites.
10. How and where those numbers are provided for are not at this stage dealt with by other questions. We would suggest that, if the Council do accept the roll forward for the plan period, there does need to be a detailed discussion on where the additional requirement for numbers is to be accommodated – which effectively means a further revision to the Strategy of the Plan. The delay to the plan means an even greater proportion of settlements have already built out the carried forward allocations and thus have no planned provision for the period to 2041. It is our view that this makes the plan unsound, and additional allocation should be considered across the District.

11. We do have concerns that the delay to the plan, the fundamental changes proposed to strategy, the significant increase in allocations necessary because of the roll forward required, mean that the changes required to make the plan sound go beyond the extent that can adequately be dealt with by main modifications. We invite the Inspectors at this stage to find the plan unsound and not capable of being made sound by what is currently proposed.

JRM

Date 5th March 2024