

KING'S LYNN & WEST NORFOLK LOCAL PLAN REVIEW EXAMINATION

Analysis of windfall housing data (Downham Market, Hunstanton, North Wootton, South Wootton and West Winch) – Outstanding issues from Day 6 (26 March 2024)

On Day 6 (26 March 2024), the Inspectors requested further analysis of recent windfall developments at the larger settlements as follows:

- King's Lynn
- Downham Market
- Hunstanton
- North Wootton
- South Wootton
- West Winch

The reason for the request was to provide evidence to support the anticipated future windfall figures for the larger settlements in the proposed New Policy on Neighbourhood Plan housing requirements.

This note has been prepared as a response to this request.

Analysis of Windfall Housing for New Policy XX Neighbourhood Plans

The National Planning Policy Framework (NPPF) provides the following definition of windfall sites ‘Sites not specifically identified in the development plan’.

Windfall development forms a significant contribution to the overall housing land supply. This is calculated based historic rates of windfall delivery. It is discounted by 25% recognising that land is a finite resource. This provides an annual windfall allowance figure of 298 dwellings. This is multiplied by 15 years; it is not factored into the first 4 years of the plan period to allow sufficient time for such development proposals to gain planning permission and be delivered. This provides a total windfall allowance over the plan period of 4,470 (298 x 15 = 4,470).

The Local Plan housing figures calculation shows that 1,766 dwellings (which is broadly 40% of the total windfall allowance) is required to meet the housing requirement (Local Housing Need of 554 dwellings per year x 19-year Plan period = 10,526).

The Inspectors requested a sense check for the largest settlements, which are proposed through the new policy on neighbourhood plan housing requirements to deliver the highest windfall figures, please see Table 1 below for these settlements and the windfall calculation figure.

Table 1: Windfall Calculation Figure

Settlement	Windfall Calculation Figure
King’s Lynn	2,101
Downham Market	715
Hunstanton	403
North Wootton	103
South Wootton	187
West Winch	129

Table 2 below provides a summary of the windfall completion for each settlement over the past 10 years.

Table 2: Windfall Completions Since 2014

Settlement	Windfall Completions
King’s Lynn	656
Downham Market	597
Hunstanton	50
North Wootton	10
South Wootton	48
West Winch	57

There are a number of sites which makes up the numbers within Table 2, above, that warrant further clarification as to their windfall status for clarification purposes. These are provided in Table 3 below.

Table 3: Sites for Further Investigation

Settlement	Site Description	Planning Ref.	Date of Permission	Site Start	Site Completed	Numbers	Details & Conclusion
King's Lynn	The Nar Ouse Regeneration Area (NORA)	16/00863/RMM 11/01106/RMM 12/00414/RMM 12/01210/RMM 14/01199/RMM	06/10/2016 17/12/2011 30/04/2013 06/11/2012 04/12/2014	01/11/2017 30/04/2014 31/04/2014 31/10/2013 31/03/2015	28/05/2019 31/03/2019 31/03/2019 31/10/2015 09/08/2022	50 18 12 54 59 NORA Total= 193	NORA was an allocated site within the 1998 Local Plan as an Urban Renewal Area in which no housing figure was given as part of Policy 5/15. When the Core Strategy was adopted in 2011 this was superseded by Policy CS03 King's Lynn Area which states that the precedence will be given to the Nar-Ouse Regeneration Area, no further detail is provided including any indication of housing numbers. When the Site Allocations and Development Management Plan (SADMP) was adopted in 2016 this replaced the policies maps and site is not shown or indicated, there is also no further policy for the site, and it is not counted as an allocation with SADMP or the calculation of figures as an allocation. It is therefore considered that given the time that the sites came forward and that there was no specific site allocation policy, or attributed housing number, or it is not shown on the policies maps, that the site was not allocated/identified specifically in the development plan. The site has historically been recorded as not an allocated site within monitoring and housing trajectories. Therefore, it is considered that the NORA site should be classed as a windfall site.
Downham Market	Land On The North Side Of Bennett Street	2/01/1281/F	22/01/2002	01/01/2009	02/02/2017	210	The 1998 Local Plan allocated this site through Policy 6/4. Although no housing numbers are provided the site was specifically allocated for housing. The policy was superseded by the Core

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							Strategy (2011) as Policy CS04 Downham Market. Although CS04 doesn't mention the site it is noted that a large part of the site was built out at this time (CS Appendix 2 – list of local plan policies to be replaced, page 69). Therefore it is considered that this site is an allocation and should not be included as a windfall site. Looking through the historic windfall data for large sites this has not been included in the windfall allowance contribution/ calculation apart from once in 2016/17 where the final 14 dwellings from this site have been recorded as windfall contribution completions and they should not have been. The site is shown as removed in Table 4 which follows as '-210'. Given the low number of 14 this is not proposed to be removed from the overall windfall calculation as part of the windfall allowance.
Downham Market	Land South of Railway Road	11/01609/FM	11/04/2012	31/12/2012	31/03/2017	110	The 1998 Local Plan allocated this area as an Urban Renewal Area under Policy 6/2 for a mixture of land uses. No housing numbers were provided. The Core Strategy (2011) when adopted superseded this policy with CS04 Downham Market. The diagram for the Town shows the site as permitted housing. The site is not shown as an allocation with the Core Strategy or the Site Allocations and Development Management Policies (2016). The site did not come forward as the original Policy 6/2 sought as it has been delivered a housing development only. The site is also different in size/location to what was envisaged. The site has been historically recorded as windfall. Given it is

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							considered that this should be considered to be a windfall site.
Downham Market	Land Between Railway Road And Richmond Road	13/01164/FM	02/05/2014	31/05/2014	21/06/2018	97	The 1998 Local Plan allocated this area as an Urban Renewal Area under Policy 6/2 for a mixture of land uses. No housing numbers were provided. The Core Strategy (2011) when adopted superseded this policy with CS04 Downham Market. The diagram for the Town shows the site as permitted housing. The site is not shown as an allocation with the Core Strategy or the Site Allocations and Development Management Policies (2016). The site did not come forward as the original policy 6/2 sought as it has been delivered a housing development only. Historically the site has been recorded as part of the windfall completions. Given this it is considered that this should be considered a windfall site.

Capacity at some of the main settlements might be restricted and Table 4, which follows, provides an appreciation of this and acts as sense check based on local knowledge and planning judgement.

It should also be noted that the vast majority of the windfall competitions since 2014 at these settlements has taken place within the development boundaries. In sense checking it is considered that there might be further development potential within the development boundaries. It is also recognised that the New Policy LP02 Residential Development on Windfall Sites will not only enable sustainable windfall development to continue to be delivered within these settlement boundaries, but in addition will also seek to enable sustainable windfall development outside of the development boundaries of these more sustainable settlements. New Policy LP02 propose a figure of 50 dwellings per site at these settlements outside of their development boundaries which is a significant figure, and it could be a greater number than this if brought forward through a neighbourhood plan. This policy approach will allow windfall to continue to come forward, potentially not only maintaining historic delivery rates but exceeding them.

Table 3, which follows, provides a capacity sense check of the main settlements. It considers the main constraints of each to housing delivery, the past windfall delivery, the windfall calculation provided by New Policy XX Neighbourhood Plans, what this would be each year, and what was proposed and judged to be acceptable as part of the Housing Economic Land Availability Assessment (HELAA) which support the Local Plan (it should be noted that this dealt chiefly with sites outside of the development boundaries and some constraints identified might be able to be overcome subject to the submission of further evidence by site promoters and engagement with statutory consultees). The factors have been carefully considered and balanced to reach a conclusion on each settlement if the figure the windfall calculation is appropriate going forward as part of a Neighbourhood Plan, or a reduction should be applied based on the evidence.

Future windfall allowance could comprise the following sites which come forward and gain planning permission and are built out, sites allocated through a neighbourhood plan which are delivered, and allocations made and delivered as part of future Local Plan.

Table 3: Capacity Sense Check of Main Settlements

Settlement	Main Constraints	Past Windfall Delivery (2014 – 2024)	Windfall Calculation Figure	Annualised Windfall Calculation Figure (15 years)	HELAA Sites Capacity Potential (Outside of Development Boundary)	Conclusion on Neighbourhood Plan Figure (the remainder should be left for consideration in a new Local Plan)
King's Lynn	<ul style="list-style-type: none"> Flood risk/ River Great Ouse Highways/ main access points Road network – A47/ A147 bypass Heritage South Wootton Land already allocated by the Local Plan. 	656	2,101	140	60 on 1 site	King's Lynn is un-parished and would require the formation of a Neighbourhood Plan Forum across this relatively wide geographic area. Notwithstanding this and the lack of sites which came forward as part of the HELAA which were considered suitable at the time, this is the main town within the Borough and the most sustainable location therefore it is likely more growth would be sought here in a future local plan. Therefore, a figure of 1,575 dwellings is considered to be appropriate (25% reduction) should a Neighbourhood Plan come forward.
Downham Market	<ul style="list-style-type: none"> Road network – A10/ A1122 bypass River Great Ouse Two strategic sites allocated for 600. 	597 (-210 =387)	715	48	2,448 across 7 sites	Downham Market is relatively unconstrained and considered to be the second most sustainable location within the Borough, the HELAA demonstrates there are potential sites which could accommodate further growth. Further growth would likely be considered here through a future Local Plan. Therefore, at this time the figure of 715 dwellings is considered to be appropriate for the emerging Neighbourhood Plan to plan for. This takes into account the reduction of 210 dwellings from a site which was an allocation in the 1998 Local Plan as the New Policy and indeed the Neighbourhood Plan would have the scope for sites outside the development boundary including those considered acceptable by the HELAA.

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Hunstanton	<ul style="list-style-type: none"> • Neighbourhood Plans – designated zones of separation (Heacham, Hunstanton and Old Hunstanton Neighbourhood Plans) • The Wash • National Landscape Designations • Strategic sites already allocated. 	50	403	27	13 on 1 sites	Hunstanton is relatively constrained, capacity for growth would likely chiefly be limited to sites within the development boundary. Therefore, a figure of 100 dwellings is considered to be appropriate (75% reduction) for the Town Council as part of their Neighbourhood Plan review.
North Wootton	<ul style="list-style-type: none"> • Flood risk/ zones (west) • National Landscape Designation (north/ east) • South Wootton (south). 	10	103	7	0	North Wootton is considered to be a sustainable location with close links to King’s Lynn. Taking this into account in combination with the constraints identified a figure of 75 dwellings (25% reduction) is considered appropriate for the Parish Council to accommodate as part of their Neighbourhood Plan review.
South Wootton	<ul style="list-style-type: none"> • Flood risk/ zones (west) • National Landscape Designation (north/ east) • North Wootton (north) • King’s Lynn urban area (south) • Development land already committed/ allocated for development (approx. 1,100 dwellings). 	48	187	13	0	South Wootton is considered to be a sustainable location with close links to King’s Lynn. There are two significant growth sites here at Hall Lane and Knights Hill. Taking this into account in combination with the constraints identified a figure of 140 dwellings (25% reduction) is considered appropriate for the Parish Council to accommodate as part of their Neighbourhood Plan review.

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West Winch	<ul style="list-style-type: none"> • Highways – A10 capacity • Heritage assets; e.g. church, mill • Development land already committed/ allocated for development (approx. 4,000 dwellings, of which 2,500 would be delivered by 2040 (within Plan period). 	57	129	9	0	<p>The largest strategic allocation for King’s Lynn and West Norfolk for 4,000 homes in the fulness of time is allocated by the Local Plan here. This includes land within North Runcton and West Winch Parish. Given this and that parts of the Growth Area are what could be considered to be part of the existing built-up area of West Winch, a figure of 95 dwellings would be appropriate (25% reduction).</p>
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