'At Least x Number of Dwellings' - An Update Note

1. Introduction

- 1.1 The Inspector examining the Site Allocations and Development Management Policies Plan (SADMP) made a number of recommendations in his final report to the Borough Council, these included changes which would be required to be made to the submitted version of the plan in order for it to be considered 'sound', and therefore could be adopted by the Borough Council. In this case 'sound' means that the plan is positively prepared (meets housing need), justified, effective and consistent with national policy. The Main Modification (MM) of most relevance to this update note can be found at paragraph 21 of his report:
 - '21. In order to strengthen the flexibility of the Council's approach it is recommended in MM1 that all the policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the SADMPP to be positively prepared.'
- 1.2 This was incorporated as a Main Modification to the submitted version of the SADMP, and therefore appears in the adopted plan. The inspectors report can be viewed in full via the link below:

https://www.west-norfolk.gov.uk/info/20093/site allocations and development plan/367/examination

1.3 At the previous Local Plan Task Group meeting the Members requested an update as to the impact of this Main Modification.

2. Schedule of Allocations

2.1 What follows, at Appendix 1, is a schedule of all the residential housing allocations taken from the adopted SADMP (2016) and includes the details of planning permissions granted and those currently under consideration, as of 23rd of December 2016.

- 2.2 Please note that this is a snap shot in time and includes full planning permissions, outline planning permissions and pre-application enquiries. Whilst some applications might be withdrawn or modified over time, those that are under consideration have been included so that what is being proposed currently is taken into account along with what already has planning permission.
- 2.3 The schedule displays a simple traffic light approach, with those sites highlighted in green potentially providing a higher number of dwellings, amber sites providing the same number, and red sites providing fewer dwellings than stated by the relevant policy.
- 2.4 The schedule illustrates that 10 sites have/are coming forward for less than the dwelling number allocated. 17 sites have come forward for the same number they have been allocated for. Whilst 31 Sites have come forward detailing a higher number than the minimum allocated for. Note that the West Winch Growth Area and the Hopkins Homes application covering the northern portion of this strategic site have not been included within this calculation. This would alter the numbers and would not be considered to give a true picture at this time.
- 2.5 Overall there is currently potentially for an additional 795 dwellings. The reasons for sites providing a certain number of dwellings are site specific, for example a site might be able to provide a higher number if the area of allocation is sufficient. The constraints upon the site will be an important factor. In some cases the lack of a demonstrable housing land supply resulted in a larger area than that allocated or proposed for allocation gaining planning permission.

3. Land Supply Impact and Meeting Housing Need

3.1 The NPPF is clear, at paragraph 47, that in order to deliver a wide choice of high quality homes local planning authorities should boost significantly the supply of housing. It would appear that by expressing the allocations as a minimum this is assisting with this requirement. This also means that the SADMP strategy is based upon meeting the identified housing need.

- 3.2 This is evidenced by The 'Heacham' Inspector in his decision letter, which stated:
 - '37. In support of the Council's trajectory, I note that a number of SADMP allocations have either been granted planning permission or are in the process of obtaining permission. Additionally, the allocations in the SADMP are expressed as minima and it is not inconceivable that some allocated sites will yield more than envisaged in the plan. This is evidenced more generally in the LPA's response to the SADMP Inspector on this matter and is exemplified locally in Heacham on the main allocation at site G47.1 (where the total allocated capacity has been permitted on approximately half the allocated site area). Accordingly, I consider the LPA's assessment on the scale of supply from the SADMP allocations is not over-inflated.'

The Inspectors 'Heacham' decision letter can be viewed in full via the link below:

https://www.west-norfolk.gov.uk/info/20185/planning policy research/353/five year supply of housing

4. Conclusion

- 4.1 It is clear that by expressing the SADMP allocations as 'At Least x number of dwellings' is having a positive impact upon the number of dwellings coming forward. Whilst some site have come forward for the same number of dwellings as specified by the relevant policy as a minimum, and some have even come forward for less, overall 3,613 dwellings are potentially coming forward on allocations for 2,818 dwellings. This represents a further 795 dwellings coming forward that could have without the Main Modification. This accounts for in excess of one year's worth of supply with an FOAN of 710 dwellings per year, and highlights the importance of the Main Modification is the context of five year housing land supply and meeting the housing need of the borough.
- 4.2 Whilst there is the potential for sites to come forward for a higher number than the minimum number provided by the relevant SADMP Policy, the proposal will still be judged against that policy, others contained within the SADMP and Core Strategy, as well as National Policy.

Appendix 1 Schedule of SADMP Allocations

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
King's Lynn	E1.4 Marsh Lane	15/00828/FM (granted)	130	130	130	0
	E1.5 Boal Quay		350			
	E1.6 South of Parkway		260			
		Lynn Sport is split across 4 sites known as Lynn Sport 1, Lynn Sport 3, Lynn Sport 4 & Lynn Sport 5. Lynn Sport 3 – PP for 54 dwellings, 16/00097/FM, is programmed for an official start on site in March 2017, with a 1 year build period, to May 2018. Lynn Sport 4 & 5 - application for 89 dwellings, 16/01327/FM, anticipated a start on site date of March 2018, complete October 2020. Lynn Sport 1 - full planning permission submitted December 2016, 16/02227/FM for 82 dwellings, start on site March 2018 built out				
	E1.7 Lynnsport	by October 2020.	297	225	297	-72
	E1.8 South Quay		50			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	E1.9 Columbia Way		100			
	E1.10 Wisbech Road		50			
	E1.11 Southgates		20			
West Lynn	E1.14 St Peters Road	16/01327/FM, for part of the site for 44 dwellings.	49	44	49	-5
	E1.15 Bankside		120			
West Winch	Growth Area E2.1	13/01615/OM pending consideration (northern portion of the site, for 1,100 dwellings)	1,600			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
South Wootton	E3.1	The majority of the site is being promoted by Lark Fleet Homes, a house building firm; they carried out a public exhibition at South Wootton in December 2016. They have recently submitted a pre-app detailing 450 dwellings 16/00172/PREAPP. A smaller, northern, portion of the site has come forward with a preapplication 16/00147/PREAPP for approx.145 dwellings. A further smaller portion is owned by Norfolk County Council which as yet has not come forward.	300	595	300	295
Knights Hill	E4.1	15/01782/OM (pending consideration)	600	65	600	115
Talignto Filli	LT.1	13/00033/PREAPP	000	650	000	113
Downham Market	F1.3	14/00045/PREAPP 15/00104/PREAPP	250	150 250	250	150

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application	SADMP Dwelling Allocation ('At Least')	Difference
	F1.4	15/00135/OM (granted)	140	170	140	30
Hunstanton	F2.2	16/00082/OM (permitted)	120	120	120	0
Transcanton.	F2.3	16/00084/OM (pending consideration)	50	60	50	10
	F2.4	14/01022/FM (granted)	163	166	163	3
	F2.5 (Employment)	16/00084/OM (pending consideration)				
Wisbech Fringe	F3.1		550			
Brancaster	G13.1	15/00187/PREAPP	5	8	5	3
Burnham Deepdale (Brancaster Staithe)	G13.2	16/02140/FM (pending consideration)	10	12	10	2
Burnham Market	G17.1	13/01810/FM	32	32	32	0
Castle Acre	G22.1	15/00942/OM	15	15	15	0

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	005.4	45/04245/044	10	10	4.0	0
Clenchwarton	G25.1	15/01315/OM	10	10	10	0
	G25.2	15/01269/OM	20	19	20	-1
	G25.3	15/02008/O & 16/00305/OM	20	20	20	0
Denver	G28.1		8			
Dersingham	G29.1	15/00129/PREAPP	20	30	20	10
	G29.2	16/00144/PREAPP	10	10	10	0
Docking	G30.1	16/00866/OM (pending consideration)	20	33	20	13
East Rudham	G31.1		10			
East Winch	G33.1	15/01793/OM	10	10	10	0
Emneth	G34.1		36			
Feltwell	G35.1	16/00125/PREAPP	50	60	50	10
	G35.2		40			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application	SADMP Dwelling Allocation ('At Least')	Difference
	G35.3		10			
Hockwold	G35.4	15/01472/F	5	3	5	-2
Fincham	G36.1	16/01747/FM	5	5	5	0
Gayton	G41.1	15/01888/OM	23	40	23	17
Grimston & Pott Row	G41.2	15/01786/OM	23	27	23	4
Great Bircham	G42.1	16/00888/O (pending consideration)	10	11	10	1
Great Massingham	G43.1	16/01634/OM (pending consideration)	12	16	12	4
Harpley	G45.1		5			
Heacham	G47.1	15/00352/OM granted for 69 dwelling on approx. 50% of the site. 16/01385/FM pending consideration for 133 dwellings on all of the site.	60	133	60	73
	G47.2	16/00245/O	6	8	6	2

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Hilgay	G48.1	16/00718/OM (pending consideration)	12	17	12	5
Hillington	G49.1		5			
Ingoldisthorpe	G52.1	15/02135/OM	10	15	10	5
Marham	G56.1		50			
Marshland St James	G57.1 G57.2	15/01826/OM	15	17	15	2
	G37.2		10			
Methwold	G59.1	15/01683/FM	5	30	5	25
	G59.2	15/02125/FM	25	44	25	19
	G59.3	15/02122/OM	10	12	10	2
	G59.4	16/00611/F (pending consideration)	5	5	5	0
Middleton	G60.1		15			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
		10/01/05/01/1				
Runcton Holme	G72.1	16/01186/OM (pending consideration)	10	10	10	0
Sedgeford	G78.1	16/01414/O (pending consideration)	10	9	10	-1
Shouldham	G81.1		5			
	G81.2	16/01515/O (pending consideration)	5	8	5	3
Snettisham	G83.1	15/02006/OM & 14/00944/FM	34	32	34	-2
Southery	G85.1	16/00658/FM	15	19	15	4
Stoke Ferry	G88.1	15/01931/OM	5	5	5	0
	G88.2	16/00168/OM	10	20	10	10
	G88.3	16/00493/FM	12	29	12	17
Syderstone	G91.1		5			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Ten Mile Bank	G92.1	15/00222/O (part of the site)	5	3	5	-2
Terrivine Barik	002.1	15, 66222, 6 (part of the site)				_
Terrington St Clement	G93.1		10			
	G93.2	15/01856/FM (pending consideration)	17	18	17	1
	G93.3	16/00084/PREAPP	35	35	35	0
Terrington St. John, St. John's Highway & Tilney St. Lawrence	G94.1	15/00438/OM	35	35	35	0
	G94.2		40			
Three Holes	G96.1	15/01399/O & 15/01402/O	5	4	5	-1
Tilney All Saints	G97.1		5			
Upwell	G104.1		5			
	G104.2		5			
	G104.3		5			

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
	0.40.4.4	4.4/00504/5.0.45/04.405/04.4				42
	G104.4	14/00504/F & 15/01496/OM	15	27	15	12
Outwell	G104.5	16/00248/OM	5	40	5	35
	G104.6		35			
Walpole Highway	G106.1	15/01412/0 & 16/00113/0	10	8	10	-2
Walpole St. Peter / Walpole St. Andrew / Walpole Marsh	G109.1	16/01867/O & 16/01705/0 (these do not cover all of the site, 8 dwellings)	10			
	G109.2	15/01520/OM	10	10	10	0
Watlington	G112.1		32			
Welney	G113.1		7			
-	G113.2		13			
Wereham	G114.1	16/01378/FM	8	10	8	2

Settlement	Site Ref	Planning Application	SADMP Dwelling Allocation ('At Least')	No of dwellings on planning application / permission	SADMP Dwelling Allocation ('At Least')	Difference
Walton Highway/West	C420.4	16/00023/OM	10	10	10	0
Walton	G120.1 G120.2	16/00482/OM	10	10	10	0
Wiggenhall St. Germans	G123.1	15/01424/0	5	4	5	-1
Wiggenhall St. Mary Magdalen	G124.1		10			
TOTAL			6294	3613	2818	795