

## Spatial Strategy

### Strategic Growth Strategy and Housing Distribution

The Spatial Strategy is the approach to delivering the vision and objectives in the borough. The strategy sets an overview of the development priorities for the borough and outlines broadly where development is planned through to 2036.

### Housing Need

The revised National Planning Policy Framework (NPPF) introduced a new standard method for calculating housing need. This is known as Local Housing Need (LHN). This should be the starting point for calculating the housing need for the Borough over the Local Plan period (2016 - 2036).

LHN was introduced in part to make the process more transparent and speed up the plan process, it would also assist Government in reaching their ambition for 300,000 homes to be completed in England each year by the mid-2020's.

As updated at April 2020, the Local Housing Need (LHN) for West Norfolk is calculated as 539 new dwellings annually. This based upon the standard methodology as introduced by NPPF and associated planning guidance. Spread over the 20-year plan period (2016 -2036) this results in a need of 10,780 dwellings to be planned for.

The latest Housing Trajectory (based upon the 2019/20 financial year) shows that housing completions and housing commitments (existing allocations and planning permissions) account for a total of 11,946 homes. Purely taken as a number with a Local Housing Need of 10,780 no further allocations would be required.

However, to ensure that the Local Plan review is positively prepared, that the Borough Council is in the best place to be able to demonstrate a 5 year housing land supply position, and pass the Housing Delivery Test, a degree of flexibility has been factored in as part of the Local Plan review with regard to housing numbers. This also recognises that some sites may not come forward as envisaged at the time the housing trajectory was prepared. It also acknowledges that as part of the Local Plan review some of the allocations made by the previous Local Plan which have not progressed are deallocated and removed from the Local Pan review.

**Need** = 10,780

**Supply** = (Completions & Commitments) 11,946

+ Proposed Allocations through the Local Plan review = 12,057 ('Planned' provision)

**Surplus** on 'planned' provision = + 1,277

The calculation above shows that the LHN can comfortably be meet. Planning for almost an exact number to meet the need leaves little room for manoeuvre over a 20-year plan period should any site not come forward as envisaged, and so an element of flexibility has been factored in. This clearly looks at the growth which will be planned and allocated; however, it is relevant to note the important contribution that windfall development, i.e. those sites which will come forward and gain planning permission (and subsequently be built) which are not specifically allocated within the Local Plan or Neighbourhood Plans. Such sites could come forward within settlement development boundaries, or they could come forward outside development boundaries as further flexibility for

this is built into the Local Plan review with the inclusion of a new policy specially related to such development opportunities (Policy LP26).

The latest calculation of windfall contributions (as part of latest housing trajectory) illustrates that on average, since 2001 to date, 311 dwellings complete each year from windfall sources. Note that this is very conservative calculation as it includes a 25% discount recognising that land is a finite resource, despite the planning system being very permissive towards such developments. Also, to avoid double counting and allowing sufficient time for such development to come forward no windfall allowance is considered in years 1,2 or 3. There are 16 years of the Local Plan period to run. However, we have to allow a period of 3 years with no allowance giving sufficient time for such sites to come forward, so 13 years of the windfall allowance is calculated. This equates to 4,043 dwellings.

In terms of flexibility it is proposed:

- Local Plan review surplus on 'planned' provision = 1,277
- Plus, the projected windfall allowance (4,043) = 5,320

This takes the *potential* projected supply of housing in the plan period to:

- Completions & Commitments = 11,946
- Plus, Local Plan review Allocations (111) = 12,057
- Plus, Windfall (4,043)
- Total projected Supply = 16,100
- **16,100 (supply) – 10,780 (Need) = 5,320**

The above calculation demonstrates that there is a healthy degree of flexibility factored in.

There is even further additional flexibility, possibly in addition to this, as all the allocation policies include the words 'at least' before the proposed number of dwellings. This reflects the need for the Local Plan to be positively prepared. Should it be found that an allocated site could not accommodate the proposed level of development because of local issues, it is important that the Local Plan incorporates sufficient flexibility to address such a situation. To this end it is important to ensure that the wording of each allocation policy incorporates sufficient flexibility. The latest housing trajectory shows that in the region of 80% of the Local Plan allocations have come forward and benefit from planning permission. The number the site has permission for has been included in the above calculations. It is therefore possible that those sites which have yet to come forward could do so for slightly higher numbers.

It is also important that the best use of land is achieved but that this should not be at the expense of other considerations such as the provision of open space, and local amenity considerations. If a proposal came forward for a planning application in excess of the specified figure, it would have to demonstrate carefully how it meets design, amenity and other safeguards (with explicit reference to relevant policies, including; LP16, LP17, LP18 and LP19) and clearly state how the additional units could be accommodated without detriment to the locality.

The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Any new homes which

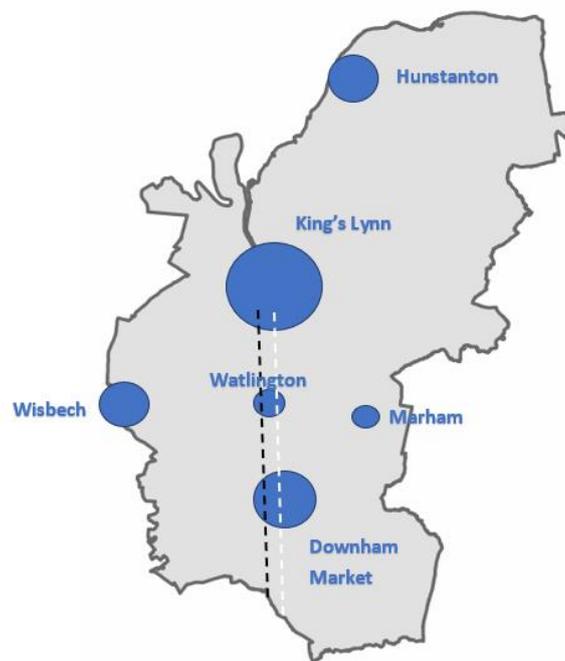
come forward through a Neighbourhood Plan will add to the housing numbers (see section on Neighbourhood Plans).

### **Distribution of Development**

Local housing need has been discussed at length in the previous section. The impact of this results in no absolute need to make any further allocations. This combined with the fact that this is a review of an existing Local Plan which made significant allocations across the Borough, most of which are supported through the Review leaves little room to impact upon the growth strategy already established by the current Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016). Whether the Local Plan review is taken forward or not this pattern of growth will occur as the existing Local Plan will remain in place, and note this is a review.

The Growth options for the draft Local Plan review have been re-assessed and the latest position with regard to housing numbers and that this is a review of an existing Local Plan, as explained earlier. It should be noted that previously the distribution of growth was to distribute just the new allocations needed, however there are now limited new allocations and therefore little opportunity to influence the strategic direction of growth which has occurred / will occur as a result of the current Local Plan and its allocations.

Given the position and the context explained above combined with the assessment of the strategic growth options through the Sustainability Appraisal. The Borough Council preferred option is that shown diagrammatically below:



The table below shows the aggregate figures for the housing allocations proposed by the Local Plan review, note that the majority are carried forward from the SADMP. A total number of homes allocated is provided as is a percentage of this for each category of place to illustrate the overall pattern of allocated growth.

Place	Homes Allocation No.	Homes Allocation %
<b>King's Lynn &amp; Surrounding Area</b>	<b>3,835</b>	<b>62</b>
King's Lynn	865	14
West Lynn	170	3
South Wootton	300	5
North Wotton	0	0
West Winch	2500	40
<b>Main Towns</b>	<b>1273</b>	<b>21</b>
Downham Market	390	6
Hunstanton	333	5
Wisbech Fringe	550	9
<b>Growth Key Rural Service Centres</b>	<b>117</b>	<b>2</b>
Watlington	32	1
Marham	85	1
<b>KRSC</b>	<b>740</b>	<b>12</b>
<b>Rural Villages</b>	<b>210</b>	<b>3</b>
<b>SVAH</b>	<b>0</b>	<b>0</b>
<b>Total</b>	<b>6175</b>	<b>100</b>

## Neighbourhood Plans

The Localism Act 2011 envisages that local communities can play an important role in shaping the future of their locality. In West Norfolk a significant number of communities are engaged in the preparation of neighbourhood plan to do exactly that.

The Borough Council supports those town/parish councils and local communities who wish to prepare a Neighbourhood Plan for their Area. There are in the region of 100 parishes within the Borough and the un-parished area of King's Lynn. The Local Plan review realises the important role which Neighbourhood Plans can play in contributing towards housing growth. Currently there are approximately 40 parishes involved in the Neighbourhood Plan process. As discussed above, whilst there is no absolute need for further allocations to meet the LHN, so rather than a specific number of new homes that are required being provided to Neighbourhood Plans, they will have the ability to assess sites within their Area and make appropriate land use allocations providing that this isn't at a scale which could impact negatively upon the strategic direction of growth established through the Local Plan review. This will provide further housing on a local scale and flexibility in terms of the overall borough-wide housing numbers. To date a number of made Neighbourhood Plans have made such allocations, and a number which are emerging are seeking to do this as well.

The Borough Council will not therefore seek to make specific allocations for those areas with or preparing a Neighbourhood Plan within the Local Plan review. Any additional housing numbers that do come forward through Neighbourhood Plans will make a contribution and because of the LHN and ability to meet this, these homes will be treated as additional flexibility rather than relied upon.

## Development on Brownfield Sites

It is important to make best use of available sites across the Borough. The Local Plan review makes allocations on land for a variety of uses; residential; employment; retail; open spaces etc. However, there is a need to balance the development of greenfield sites with previously developed land. (See Appendix 1 Glossary for definition of Brownfield Land or Sites). In addition, brownfield sites not necessarily in current productive use may still have the right to be used for employment.

Policy LP06 The Economy seeks to allow the potential change away from employment to residential on an individual site-by-site basis, subject to certain criteria being met:

- continued use of the site for employment purposes is no longer viable, taking into account the site's characteristics, quality of buildings, and existing or potential market demand; or
- of the site for employment purposes gives rise to unacceptable environmental or accessibility problems particularly for sustainable modes of transport; or
- an alternative use or mix uses offers greater potential benefits to the community in meeting local business and employment needs, or in delivering the Council's regeneration agenda.

Whilst the Borough Council supports the use of brownfield sites for residential uses the Plan objectives do seek to retain a resource of employment sites across the Borough. Allocations are retained and made within the Plan on brownfield sites, with approximately 10% of allocated dwellings being on brownfield sites, but Policy LP06, referred to above, will provide an opportunity to bring additional housing sites forward on such land.

The Plan aims to positively allocate land for housing, but adventitious sites will continue to come forward, positively from brownfield sites being reused.

## Development on Small and Medium Sites

The NPPF (2019, paragraph 68) states that small and medium sized sites have the ability to make an important contribution towards the local housing need requirement. It also identifies that such sites are often built out relatively quickly. Accordingly, it advocates a good mix of site sizes and advocates that Local Planning Authorities should identify 10% of housing requirement to be met on such sites.

The Housing Trajectory is split into various sections, which is replicated below, this shows the completions and commitments for each section including small and medium sites. The table shows the numbers for the 2016/17 Housing Trajectory as this was at the start of the Local Plan review period and the latest Housing Trajectory (2019/20) as a check, note that 1,802 dwellings have completed between April 2016 and March 2020.

Housing Source	2016/17 Housing Trajectory	2019/20 Housing Trajectory
Sites of 10+ homes	1,527	1,238
Sites of 5 to 9 homes	368	313
Sites of 1 to 4 homes	907	1,165
SADMP Allocations	7,933	7,268
Local Plan review Allocations	0	111
Other	50	160

With a Local Housing Need figure of 539 per annum over a twenty-year plan period (2016 - 2036) this equates to 10,780 in total. If the figure for dwellings from sites of 5 to 9 homes and sites of 1 to 4 homes is taken as qualifying a medium and small site respectively then the 2016/17 housing trajectory shows that 1,275 homes would meet the criteria and this equals 12%. The 2019/20 housing trajectory shows that 1,478 homes would qualify and this equals 14%. This is without the need to investigate the merits of the SADMP Allocations. However, for completeness 48 of the SADMP allocations are on sites of 1 hectare or less and are included within the 2019/20 housing trajectory as contributing 435 new homes. When factored in this increases the contribution to 1,193 new homes and provides a total percentage of 18% of the Local Housing Need being met on small and medium sites, which is in excess of the NPPF's recommendation.

### **Approach to Density on Allocated Sites**

The current Local Plan (comprising the Core Strategy 2011 and the Site Allocations and Development Management Policies Plan 2016) does not contain a specific policy for density, nor is it the intention for the Local Plan review (2016 - 2036) to introduce one. However, in line with the national guidance on the subject a modelled approach has been applied, albeit not rigidly, and it is considered appropriate to carry forward a similar approach. This modelled approach is set out in Appendix 1.

### **Custom and Self-Build Housing**

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom house building:

Self-build and custom housebuilding means the building or completion by:

- individuals;
- associations of individuals,

or

- persons working with or for individuals or associations of individuals, of houses to be occupied by those individuals;

but it does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.

Whilst legally self-build and custom house building share the above definition, custom build is commonly regarded as where an individual, commissions a specialist developer to deliver their own home. Whereas, self-build is where the individual is more directly involved in organising or constructing his or her own home. Both routes require more significant input into the design of their home than other forms of housing.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) placed a duty that (by 1st April 2016) all local authorities should keep a register of individuals and associations of individuals who are seeking to acquire plots of land for self and custom build housing in the local authority's area (to build houses for those individuals to occupy as homes). This the Borough Council does.

The National Planning Policy Framework, under the section entitled 'Delivering a sufficient supply of homes', the Government makes it clear that to boost supply, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay **and this includes people wishing to commission or build their own homes.**

The footnote to this paragraph reminds Local Planning Authorities that they are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom housebuilding. They are also subject to duties to 'have regard' to this and to give enough suitable development permissions to meet the identified demand.

The Borough Council recognises the importance that custom and self-build housing can play in contributing not only to housing supply but also to completions. Given this, and that it allows people to create a home which they ultimately want, the Borough Council is supportive of custom and self-build housing. So much so it has created a Task Group dedicated to the subject and published a Custom and Self-Build Action Plan.

The purpose of the Action Plan is to set out the Borough Council's own responsibilities and wider ambitions in respect to self-build and custom house building. To positively influence or help secure development opportunities where we can support individuals or organisations in our local communities to deliver high quality self-build or custom house building to meet demand in the borough. The Action Plan contains 15 of commitments/actions for different departments within the council. These cover the following areas: promotion, facilitation and enabling. It also provides an indicative timescale these are broadly to be achieved within in.

The Local Plan review seeks to create a policy environment which supports and encourages custom and self-build opportunities. In doing so this will provide opportunities for those wishing to build or commission the build of their own home and will also assist with the supply and the delivery of housing. The following is how the Local Plan aims to achieve this and meet a number of the actions contained within the Action Plan.

The Local Plan review seeks to introduce a new policy (LP26) for residential development adjacent to existing settlement in which additional weight will be given to proposals for custom and self-build development.

The Borough Council will support the land owners / developers of allocated sites within the current Local Plan and Local Plan review who wish to bring forward their site(s) for custom and self-build purposes. Indeed, some of the existing allocations have come forward and been delivered in this way, **and further site owners have expressed a desire to bring forward their sites in this way.**

The Borough Council through its duty to assist those communities who wish to prepare a neighbourhood plan for their area will inform and support policies which seek to encourage custom and self-build opportunities, as either residential housing allocations or more general land use policies.

### **Sites Proposed for Deallocation**

Reviewing the Local Plan provides an opportunity to review the progress of the sites allocated by the Site Allocations and Development Management Policies Plan (SADMP) (2016). **The draft version of the Local Plan review proposed the deallocation of a number of sites. This was chiefly as the sites owners either do not want to or are unable to develop their sites, and therefore there is no prospect of the sites ever coming forward and contributing towards the housing numbers.**

## Strategic Policy

### Policy LP01 Spatial Strategy

1. The Spatial Strategy seeks to strike a balance between protecting and enhancing the built and natural environment of West Norfolk whilst facilitating sustainable growth in the most appropriate locations.
2. Development priorities for the borough will be to:
  - a. Facilitate and support the regeneration and development aspirations identified in the Norfolk Strategic Planning Framework and the Borough Council's strategic priorities;
  - b. Ensure an appropriate allocation for housing and take appropriate action to deliver this;
  - c. Encourage economic growth and inward investment;
  - d. Improve accessibility for all to services; education; employment; health; leisure and housing;
  - e. Protect and enhance the **historic**, cultural and environmental assets and seek to avoid areas at risk of flooding;
  - f. Foster sustainable communities with an appropriate range of facilities.

### Sustainable Development Locations

3. In accommodating these priorities our approach will use the settlement hierarchy (set out in Policy LP02) to ensure that:
  - a. New investment is directed to the most sustainable places – particularly in the Strategic Growth Corridor;
  - b. Significant emphasis is placed on brownfield redevelopment within the towns and villages;
  - c. Sustainable urban extensions to the main towns of King's Lynn, Downham Market and Hunstanton are developed;
  - d. Locally appropriate levels of growth take place in selected Growth Key Rural Service Centres, Key Rural Service Centres and Rural Villages;
  - e. Opportunities are given for small scale housing development at all settlements including Smaller Villages and Hamlets;
  - f. New development is guided away from areas at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and to maintain the sustainability of local communities in rural areas.

In support of the overall development strategy the Council will:

#### 4. King's Lynn

- a. Promote King's Lynn as the main centre, including retail, leisure and culture, and economic driver within the borough, a significant "engine of growth" and a sub-regional centre in the East of England;
- b. Provide for new houses through the regeneration of brownfield land and urban expansion including the adjoining settlements of:
  - i. South Wootton;
  - ii. North Wootton;
  - iii. West Lynn; and
  - iv. West Winch.
- c. The area south east of the town adjoining West Winch will contribute significantly to current needs and also towards establishing a direction of future growth to meet anticipated need beyond the current plan period;

- d. Make provision for new jobs within existing and new employment areas and also as part of central area regeneration;
- e. Make appropriate positive use of the high-quality historic environment in the town through protection and sensitive inclusion in regeneration proposals
- f. To achieve these outcomes precedence will be given to the Borough Council strategies set out for:
- g. The Nar-Ouse Regeneration Area;
- h. Nelson Quay, which will combine to provide a balanced mix of housing; employment sites; educational facilities and local services;
- i. The Town Centre to promote the town's role as a sub-regional attractor with an expanded retail offer and improved accessibility to cultural, tourism and leisure uses;
- j. The Heritage Action Zone – ensuring that new development works with historic Lynn reinforcing the economic, social and environmental vitality of this modern medieval town.

#### **5. Downham Market**

- a. Downham Market will be supported as a key town within the south of the borough supporting the demands for, and improving accessibility to, local services, cultural and leisure facilities.
- b. The strategy for the town will seek to:
  - i. Provide new employment opportunities within a revitalised town centre and new allocations of land;
  - ii. Support the role of the town as a service centre for visitors and the local tourism economy;
  - iii. Provide appropriate housing growth for the town;
  - iv. Ensure existing essential services and facilities are supported and that new investment brings with it appropriate mitigation and improvements;
  - v. Support the Town Council in the preparation of their Neighbourhood Plan.

#### **6. Hunstanton**

- a. The focus for Hunstanton will be on ensuring the town develops its position as a successful service hub for the area providing retail, cultural and social facilities while strengthening its role as a year-round tourist destination.
- b. Support will be given to:
  - i. Extend the season and diversify year-round activity without detracting from the town's heritage with additional tourist facilities and leisure development;
  - ii. Improving visitor accessibility and public transport so that the town may benefit from growth proposals for King's Lynn;
  - iii. Implement improvements to the town;
  - iv. Provision will be made for appropriate housing growth for the town;
  - v. Support the Town Council in the preparation of their Neighbourhood Plan.

#### **7. The area adjacent to Wisbech**

- a. Although the town of Wisbech is beyond the borough's administrative area it does provide services and employment to people living in the borough.
- b. The Council will be supportive in principle to:
  - i. The expansion of the port-related employment area into land predominantly within the borough;
  - ii. The provision of at least 550 new houses to the east of the town.

#### **8. Rural and Coastal Areas**

- a. The strategy for the rural areas will:

- i. Promote sustainable communities and sustainable patterns of development;
  - ii. Ensure strong, diverse, economic activity, whilst maintaining local character, **historic environment** and a high-quality environment;
  - iii. Focus most new development will be within or adjacent to the selected Growth Key Rural Service Centres and Key Rural Service Centres;
  - iv. Beyond the villages and in the countryside the strategy will be to conserve and enhance the countryside recognising its intrinsic character and beauty, the diversity of its landscapes, **historic environment** and wildlife, and its natural resources to be enjoyed by all.
- b. Within the coastal areas, the Council will have clear regard to the Area of Outstanding Natural Beauty (AONB), work with its strategic partners to limit any detrimental impact of coastal change and take account of the Shoreline Management Plans, which plan for future change.

#### 9. Housing requirement calculation

- a. The LHN of 539 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 10,780 dwellings which need to be planned for.
- b. The table below shows the allocations made by the SADMP to be carried forward through the Local Plan review and those proposed by the Local Plan review A total is provided as is a percentage of the overall planned growth.
- c. This shows that broadly 70% of the growth is to take place within the Strategic Growth Corridor.

#### Housing requirement calculation

Place	Homes Allocation No.	Homes Allocation %
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<b>Total</b>	<b>6175</b>	<b>100</b>

\*4,000 new homes in the fullness of time at the West Winch Growth Area.