

Examination of the King's Lynn & West Norfolk Local Plan Review
Note on Further Evidence required from the Council to accompany
letter from the Inspectors - January 2023

1. Spatial Strategy

The Council should prepare a topic paper to explain and justify the proposed spatial strategy in the submitted Plan, in particular to cover the following matters:

- Explain the purpose of the Strategic Growth Corridor and the justification for the proposed distribution of housing growth within it, including the scale of housing growth at the WWGA, Downham Market and Watlington relative to the role of these settlements/locations within the hierarchy, their sustainability in terms of transport, facilities and infrastructure, and their population size and settlement needs.
- Explain the spatial strategy for rural settlements and communities, including the role and function of Growth KRSCs, KRSCs, RVs, and SVAHs in accommodating future rural development needs, and the justification for the level of housing growth allocated to each rural settlement, having regard to their role in the settlement hierarchy, their facilities, transport accessibility, population size and settlement needs.
- Review whether the Plan should set out housing requirements for each settlement or designated neighbourhood area in the Borough, taking account of national policy in this regard, the strategy for the pattern and scale of development in the Borough, and any relevant allocations, and if not, provide a justification for not doing so and departing from national policy on this matter.
- Review the various definitions for the 'appropriate' scale of development in the different tiers of rural settlements within the hierarchy and the spatial strategy in Policies LP01 and LP02, and consider amendments to the Plan to make this clear and unambiguous.
- Detail any suggested Main Modifications (MMs), in particular to Policies LP01, LP02, LP04, LP31, LP39, LP40 and LP41 and their supporting text, in the light of the analysis provided above.

2. West Winch Growth Area (WWGA)

The Council should prepare a topic paper to bring together the evidence supporting the proposed allocation for up to 4,000 dwellings at the WWGA in the submitted Plan. In particular, this should cover:

- The history of the evolution of the proposal for growth south east of King’s Lynn and at West Winch, with reference to evidence provided for the Examination in the current adopted development plan.
- The current planning status of the site in terms of progress on the masterplan for the WWGA and on planning applications for the respective phases of the adopted allocation for 1,600 dwellings.
- Justification for the additional growth (of 2,400 dwellings) proposed in the submitted Plan, over and above the 1,600 dwellings for which the site is allocated in the SADMP, particularly in light of the size of the overall surplus of housing land up to the end of the Plan period and beyond.
- An explanation of the results of any modelling of traffic and transport impacts arising from the growth of up to 4,000 dwellings at the WWGA, on the operation and safety of the transport network to accommodate this growth, and of the effects of transport interventions proposed to mitigate those impacts.
- Details for the proposed West Winch Housing Access Road (WWHAR), including the timetable, key dates and milestones in the Business Case process to secure DfT funding, how its delivery would be phased, and the trigger points in the housebuilding programme at which each phase and the full route would be required;
- A summary of evidence assessing the cumulative impacts of the proposed additional growth on landscape character, heritage assets, biodiversity and ecology, flood risk (including surface water drainage), air quality, community infrastructure and amenity (i.e. residential living conditions), and any recommended mitigations. Where this evidence is not yet available, the necessary assessments should be commissioned and the results summarised in the topic paper.
- Detail any suggested MMs to the submitted Plan arising from the above analysis, in particular to Policy E2.1 and its supporting text, and consequential changes to the Housing Trajectory [F22].

3. Transport Evidence

As part of the Action List [G12] published following the first week of the Hearing, we requested that a technical note be prepared to pull together the full suite of transport studies and strategies, which have been prepared to date by the Borough Council as LPA and/or Norfolk County Council as the Highway Authority (HA) to inform and/or support the spatial strategy and development proposals in the Plan.

The note provided [Examination document F39] does not adequately address the work required, as it does little more than provide links to

the various studies and strategies. It does not explain the evidence, the results of the modelling, with and without transport interventions, and the implications of the growth proposed in the Plan for the transport system.

In the specification for the technical note [G14], we asked that it should do the following:

- Summarise the results and findings of traffic and transport modelling undertaken to assess the impacts of the development proposed in the Plan and at the WWGA over the Plan period and beyond on the strategic and local transport network in the Borough.
- Explain: the recommended transport infrastructure schemes and other interventions proposed to address the impacts of planned development; the effects of those interventions in mitigating any unacceptable impacts of the proposed growth on highway safety and the operation of the road network; and the technical feasibility, financial viability and funding mechanisms of those schemes and interventions.
- Draw together and summarise the transport strategies, programmes and measures relevant to the Plan and the WWGA, and how they would help to make the proposed locations for development in the Plan more sustainable, offer a genuine choice of travel modes and support modal shift away from dependence on the car.
- Outline any other transport evidence which the LPA and HA consider to be relevant to justifying the sustainability and deliverability of the Plan's spatial and development strategy.

As part of the further work at this stage of the Examination, we require the Council and the HA to review and update document F39 to ensure it provides a full and proper analysis of the above points.

4. Settlement Hierarchy

As part of the Action List [G12], we also requested that the Council update the supporting study D21 on Further Consideration of the Settlement Hierarchy, with evidence explaining the decisions on proposed changes to the status of certain settlements within the settlement hierarchy in Policy LP02.

The update note provided by the Council [F38] does not provide the evidence requested, for the following reasons:

- The commentary explaining the decisions to change or not to change the tier of different settlements in the hierarchy, in most cases does not provide the reasoning for those decisions. Minutes of

the meetings at which the decisions were made are provided, but these mostly record the decision rather than the reasoning. As such, the status of a number of the settlements does not appear to be justified by the evidence.

- The paper does not explain how the survey responses from Parish Councils informed the decisions about the status of settlements in the hierarchy.

Therefore, as part of the further work at this stage of the Examination, we need the Council to review and update document F38 to clearly explain, along with supporting evidence, the justification and reasoning for the decisions made on the status of the following settlements in the hierarchy:

- Castle Acre
- Marshland St. James/St. John's Fen End with Tilney Fen End
- Walpole St. Peter/Walpole St. Andrew/Walpole Marsh
- Middleton
- Southery
- Denver
- Wiggshall St. Germans
- Walpole Highway
- Hilgay
- Walton Highway and West Walton
- Ashwicken
- Bircham Newton, Choseley, Fring, Fordham, Setchey, Shernbourne, Stow Bardolph and Wolferton.

The scoring for each of these settlements, as listed in D21, should be explained and how this has been used to determine a settlement's status in the hierarchy, taking into account the survey responses from Parish Councils and the relative position of other settlements with the same/similar scores but at different levels of the hierarchy.

5. Housing Land Supply

Deliverability and Developability of Housing Allocations

In response to our request in the week 1 Action List [G12], the Council provided a note on the Deliverability and Developability of housing allocations in the Plan [F34], with evidence intended to demonstrate the delivery programme for each site.

However, as discussed at the outset of Day 4 of the Hearing, for a number of the housing allocations the evidence to demonstrate their deliverability or developability is lacking and for other sites their delivery timescale contradicts that shown in the Housing Trajectory [F22].

Therefore, as part of the further work at this stage of the Examination, we ask that the Council review and update the evidence as follows:

- Review each allocation in note F34 to ensure that sufficient evidence is provided in respect of lead in times, start dates, build out rates and completions to demonstrate its deliverability or developability according to the definitions in the NPPF;
- Update the record of completions for sites under construction for the period to 31 March 2023;
- Make corresponding changes to the Housing Trajectory to ensure it reflects the delivery timescale for each allocation in the updated note on Deliverability and Developability.

Housing Land Supply report

The Council submitted a report on Housing Land Supply [F43b] in support of its HPS on Matter 6. However, we would invite the Council to review and update it as follows:

- Paragraph 4 states that 'the Council would like to fix the five-year housing land supply through the examination process with a 10% buffer applied to the overall housing requirement'. However, as agreed at the Hearing session on 10 January, the Council cannot seek to 'fix' the five year supply at this stage of the Examination process and, as such, reference to this should be removed from the Housing Land Supply report;
- It may also be that the 5-year housing land supply calculation will need to be adjusted in the light of changes to the delivery status and trajectory of sites in document F34.

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Planning Inspectors
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