

**Borough Council of King's Lynn and West
Norfolk**

**Housing and Economic
Land
Availability Assessment
(HELAA)**

2014

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Executive Summary

This Housing and Economic Land Availability Assessment (HELAA) has been developed to determine the potential housing supply from identifiable land within the Borough of King's Lynn and West Norfolk over the next 15 years to 2029. This time frame encompasses the remainder of the current plan period, 2014-2026. This particular assessment has been prepared alongside the Site Allocations and Development Management Policies (SADMP) Pre-Submission document.

The assessment is presented in four parts:

1. The HELAA Report.
2. Site assessment tables. Categorised into King's Lynn (including West Lynn), West Winch, Downham Market, Hunstanton, Rural North and Rural South.
3. Mapping.
4. An indicative housing trajectory and an employment/economic land trajectory.

The HELAA Report itself is divided into three sections:

1. Introduction – Setting out the purpose of this document, the relationship between the HELAA and Development Plan Documents. A background to the report and an explanation of the overall housing target.
2. Methodology – The methodological approach to assessing the suitability, availability and achievability of sites for housing. The methodology is explained in 5 stages equivalent to those outlined in the Planning Practice Guidance: *Housing and economic land availability assessment*.
3. Assessment Analysis and Conclusion – A detailed analysis of the results from the assessment and a final conclusion.

The Total Potential

The Core Strategy (CS) sets an overall target of 16,500 houses to be built within the plan period (2001-2026), this equates to 660 dwellings per year. 8,093 dwellings have already been completed (2001 – 2014). This means that a minimum of 8,407 dwellings are required to be built within the Borough over the next 12 years (2014 – 2026) in order to meet the CS target. This HELAA looks at a 15 year time frame, beyond 2026, to 2029. The Borough's Objectively Assessed Need for housing (OAN) as illustrated within 'Assessing King's Lynn and West Norfolk' Housing Requirement' (N McDonald, 2015) is either 680 or 710 dwellings per annum, depending upon the inclusion of Unattributable Population Change (UPC). This results in a HELAA target between 10,200 and 10,650.

Core Strategy Target 2001-2026:	16,500 dwellings
of which: Completed 2001-2014	8,093 dwellings
Housing target 2014-2026	8,407 dwellings
 HELAA Target 2014-2029:	 10,200 – 10,650 dwellings

The HELAA has identified that a total of 7,390 dwellings could potentially be delivered on identified sites within the remainder of the plan period to 2026, and 10,272 dwellings to 2029. These figures when combined with sources of sites used to compile the housing trajectory equate to 13,982 dwellings that could be provided in the 2014 – 2026 period, and 17,548 dwellings to 2029.

The HELAA can be used to show progress with regard to the CS Target. This is achieved by removing the justifiable windfall allowance and the HELAA sites that are not SADMP allocations, as the CS Target does not include these sources of dwelling supply, and adjusting the time frame to that of the plan period. This shows that there is sufficient capacity to meet this requirement with 10,345 dwellings identified for completion within the 2014 – 2026 plan period. This equates to a total of 18,438 dwellings over the plan period 2001 – 2026.

The HELAA Target to deliver 10,200 – 10,650 dwellings is also met, as 10,615 dwellings have been identified from HELAA sites and 17,548 dwellings in total.

The phasing of the HELAA sites has been assessed to fall into the following timescales:

Site Phasing	HELAA Identified Sites	Total Identified Sites
0 – 5 Years	2,388 dwellings	6,214 dwellings
6 – 10 Years	4,033 dwellings	6,331 dwellings
11 – 15 Years	3,851 dwellings	5,003 dwellings
Total	10,272 dwellings	17,548 dwellings

This can be expressed as 6,214 deliverable dwellings and 11,334 developable dwellings that have been identified overall. Of this the HELAA sites make up 2,388 deliverable dwellings and 7,884 developable dwellings. In terms of site numbers the HELAA has identified 147 sites that are deliverable and 204 sites that are developable.

The HELAA also demonstrates a 5 year land supply of 7.76 years – 8.14 years using the Liverpool Method with a 5% buffer, depending upon the inclusion of UPC and 7.09 years – 7.46 using the Sedgefield Method with a 5% buffer, depending upon the inclusion of UPC.

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1. Introduction

- 1.1 The purpose of this Housing and Economic Land Availability Assessment (HELAA) is to identify the housing potential of sites that fall within the King's Lynn and West Norfolk Local Plan area over the time period to 2029.
- 1.2 Local planning authorities are expected to undertake such assessments, and update them regularly, as outlined by the National Planning Policy Framework (NPPF). This edition of the King's Lynn and West Norfolk HELAA updates the position set out in the 2008 Strategic Housing Land Availability Assessment (SHLAA) and the subsequent 2011 SHLAA update.
- 1.3 This HELAA forms part of the background evidence, which together with other studies, informs and supports the housing delivery strategy in the King's Lynn and West Norfolk Local Plan. It will also be one of the considerations that will inform the preparation of other development plan documents, including the Site Allocations and Development Management Policies Document (SADMP). The HELAA aims to provide a realistic number of dwellings that each site can potentially provide by assessing each site in order to determine whether it is suitable, available and achievable for housing. It also indicates the timescales for their delivery.
- 1.4 It is important to note that the HELAA is a technical study and not a policy document. This document does not allocate sites for development and the inclusion of any site within this document provides no guarantee of it being permitted for development. Similarly, the non-inclusion of a site does not preclude future development, providing proposals meet planning policy that is in place at the time that a site comes forward.

Policy Context: National Planning Policy Framework & Planning Practice Guidance

- 1.5 Since the last SHLAA update was prepared and produced in 2011, the NPPF and Planning Practice Guidance (PPG) have been published. The latter contains guidance on Housing and Economic Land Availability Assessment.
- 1.6 The PPG suggests that local authorities should combine their economic and housing assessments in order to create a HELAA.
- 1.7 The NPPF states that the purpose of this is *'to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing'* – Para 159.
- 1.8 The PPG builds upon this stating that the HELAA forms a key component of the evidence base to underpin policies in development plans for housing and economic development and that assessment should:
- identify sites and broad locations with potential for development
 - assess their development potential
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability)
- 1.9 The HELAA should provide robust information on potential housing sites that can be identified in the local plan and other development documents. The NPPF, paragraph 47, requires local authorities to:
- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
 - and to identify a short term supply of deliverable sites that are ready for development (years 1-5: a five-year supply of specific sites); and specific

developable sites or broad locations for the medium term (years 6–10) and ideally in the long term (years 11–15).

1.10 The footnote to NPPF paragraph 47 provides the following definitions for deliverable and developable sites:

Deliverable sites should be:

- available now;
- offer a suitable location for development now;
- be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development of the site is viable.

Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within the first five years; for example if they are no longer viable or if there is no longer a demand for the type of units, or if sites have long term phasing plans.

Developable sites should be:

- in a suitable location for housing development;
- there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

Core Strategy

1.11 Since the last SHLAA update, 2011, the King's Lynn and West Norfolk Borough Council Core Strategy (CS) was adopted in July 2011. This provides strategic level guidance as to growth and significant issues across the Borough in the period to 2026. The CS forms one part of Local Plan. It is the main document setting out the long term strategy, including the vision and objectives for the Borough, and the broad policies that will steer and shape new development.

Site Allocations and Development Management Policies

- 1.12 The SADMP Pre-Submission document has been prepared to give the spatial detail below higher level aspirations, within the CS. The Borough Council has been engaged in a long and complex process to prepare the document, and have now reached the Submission stages culminating in a public Examination of the document, with an anticipated adoption date in 2015.
- 1.13 The SADMP Pre-Submission document is intended to give effect to and complement the already adopted CS. Once adopted, the SADMP will sit alongside the CS to form the Local Plan for the Borough. Its policies will guide development in the Borough for the period up to 2026. Formally speaking, the SADMP will be a 'development plan document' under the Planning Acts.
- 1.14 The CS sets out the scale of growth and broad distribution for the Borough and the SADMP will help achieve this.

Housing Requirement

1.15 The CS sets a figure of 16,500 new dwellings to be completed across the Borough over the period 2001 – 2026, and the SADMP Pre-Submission document makes allocations to meet this target.

1.16 Within the figure are targets for different categories of place:

- Kings Lynn Area
- Other Main Settlements
- Key Rural Service Centres (KRSC)
- Rural Villages (RV)
- Smaller Villages and Hamlets (SVAH)

1.17 The figures for rural settlements are defined according to population size, and facilities present. Adjustments are made according to site availability and local aspirations.

1.18 Table 1, on the following page, shows after taking into account completions and commitments (outstanding planning permissions) between 2001 and March 2013 a total of 10,155 dwellings have been provided. These combined with the allocations proposed in the SADMP Pre-Submission document (6,489) there is provision for a total of 16,644 new dwellings.

Table 1. Overall Summary Table

Place	Core Strategy Provision July 2011	Total Completions & Commitments Apr 2001-Mar 2013	Pre Submission document Allocations	Pre Submission document Total
King's Lynn Area				
King's Lynn		2934	1450	
(West Lynn)			249	
Plus settlements adjacent to KL				
North Wootton		63	0	
Knights Hill			600	
South Wootton		279	300	
West Winch/North Runcton		219	1600	
Sub Total	7511	3495	4199	7694
Other Main Settlements				
Downham Market (incl. Downham W.)	2711	2036	390	
Hunstanton	580	360	333	
Wisbech Fringe (incl. Walsoken)	550	35	550	585
Main settlements and settlements adjacent to King's Lynn - Sub Total	11352	5926	5472	11398
Key Rural Service Centres (KRSC) (x21)				
KRSC Sub Total	2878	2796	787	3583
Rural Villages (RV) (x34)				
RV Sub Total	1280	1042	230	1272
Other - Smaller Villages and Hamlets (SVAH)				
Other/SVAH Sub Total	351	391	0	391
Rural Areas – Sub Total	4509	4229	1017	5246
Total		10155	6489	16644

Housing Targets for the HELAA 2014

1.19 The CS (policy CS09) identifies that a minimum of 16,500 dwellings will be required across the Borough over the period 2001-2026. Since the start of the plan period 8,093 dwellings have been completed within the Borough. Therefore, there is a requirement for to identify land which could potentially accommodate a minimum of 8,407 dwellings in the remainder of the plan period.

Table 2. Housing Numbers

Target – total number of dwellings required over plan period 2001-2026	Completions – total number of dwelling completions from 2001-2014	Residual target – total number of dwellings required 2014-2026	2014 HELAA target – total number of dwellings required 2014 -2029
16,500	8,093	8,407	10,200 – 10,650

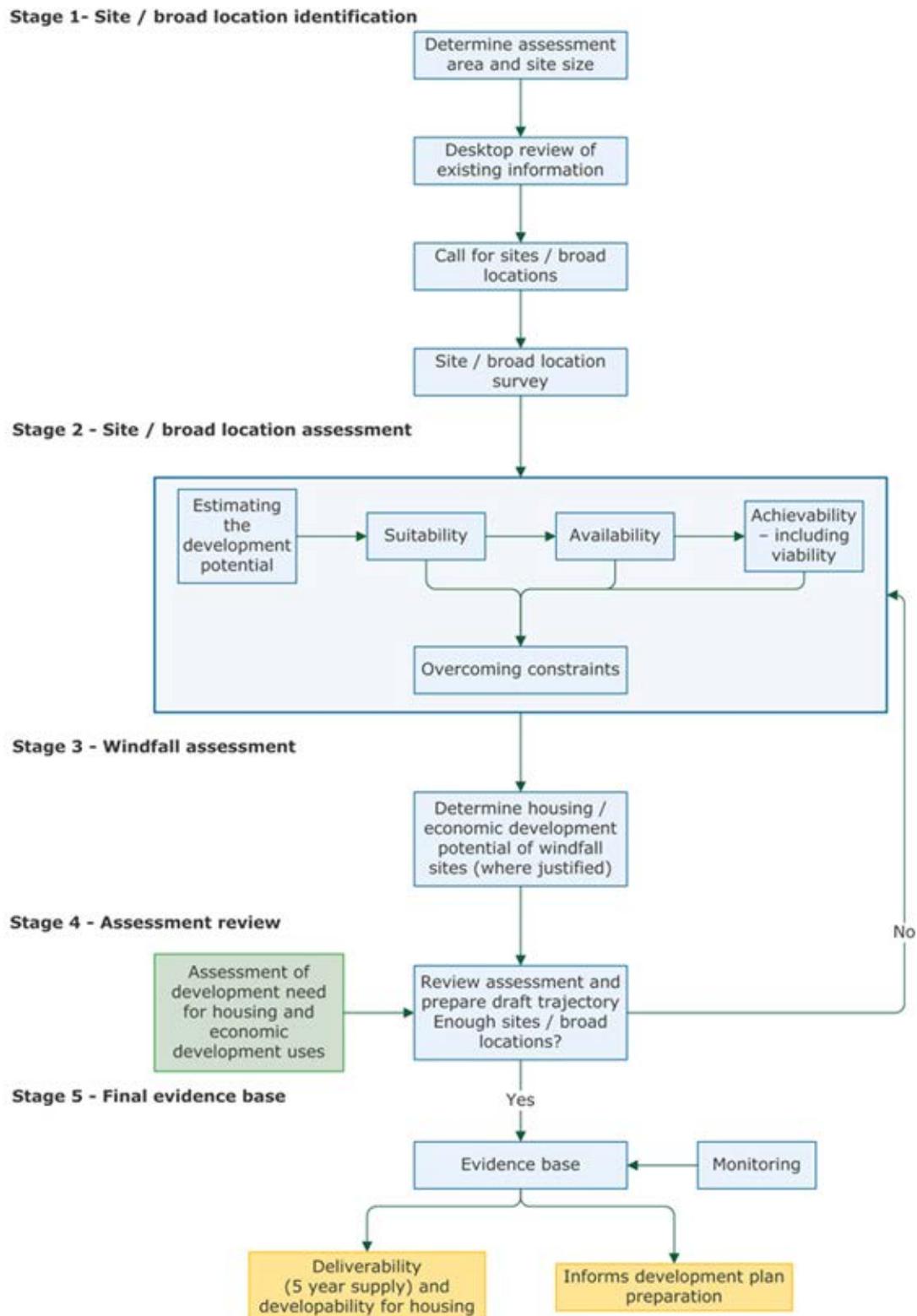
1.20 The HELAA should identify a higher number of potential sites than the target set by the CS. Without a considerable supply of land for housing over the plan period, there is a danger that sites may not come forward as expected in the assessment, therefore compromising the ability to deliver sufficient housing in the Borough. Identifying a number of potential sites also ensures that there is considerable choice in the selection of sites for allocation within in The SADMP Pre-Submission document.

1.21 Therefore the targets are to identify sites that can accommodate 8,407 dwellings to meet the plan period total of 16,500, not including windfall, and to identify between 10,200 – 10,650 dwellings to meet the 2014 HELAA target, OAN and a 5 year land supply target.

2. HELAA Methodology

- 2.1 This section sets out the methodology used in undertaking this HELAA, having regard to the requirements of both the NPPF and the PPG. The guidance advocates a five stage process for completing the HELAA which is illustrated in Diagram 1, on the following page.
- 2.2 This HELAA builds upon the previous 2008 SHLAA and the subsequent 2011 update, and is a closely related document to the SADMP Pre-Submission document (note this was called the Site Specific Allocations and Policies at earlier stages of its development). The SADMP Pre-Submission document once adopted will allocate land for development whereas the HELAA assesses the potential for development on each site. In many cases the HELAA identifies a broader range of potential housing sites than would be needed, this provides an element of choice in the SADMP Pre-Submission document, as usually any site which is outside the current development boundary requires allocation before it could be developed.
- 2.3 The assessment includes:
- HELAA assessment tables (part 2): listing of all sites considered, detailed assessment of each site, in terms of its suitability for development, availability and achievability (including site viability) to determine whether a site is realistically expected to be developed and when;
 - the potential quantity of development that could be delivered on each site, including a reasonable estimate of build out rates and setting out any barriers to delivery; and
 - their geographic locations mapped (part 3).

Diagram 1. Planning Practice Guidance March2014: Assessment of Land Availability Methodology Flow Chart



Stage 1 – Site / Broad Location Identification

Housing Need

2.4 The Borough Council is required to consider the Objectively Assessed Need for housing (OAN) for its area, and make appropriate provision for that figure. In preparing the CS (adopted July 2011) there was a requirement to be in conformity with the then Regional Plan, including the quantity of housing. The Borough Council did this and worked to a housing requirement of 16,500 dwellings for the period to 2026. The Regional Plan was revoked in 2012 and the new requirement to assess housing need was brought in through the NPPF in March 2012.

2.5 In order to meet the new requirement a Strategic Housing Market Assessment (SHMA) was undertaken. This considered future household formation and therefore housing need, based on Government forecasts. In summary the findings of the SHMA update undertaken in 2014, indicated that:

‘The Objectively Assessed Need in the Borough (calculated in chapter 9) fulfils this requirement and it indicates that 10,336 new dwellings are required in the 15 year period between 2013 and 2028, equating to almost 690 new homes per annum. The target is therefore meeting the vast majority (95.7%) of the Objectively Assessed Need.’

2.6 The 2014 SHMA update therefore confirms that the housing figures are still appropriate.

2.7 Following this, The Borough Council published an independent report ‘Assessing King’s Lynn and West Norfolk’s Housing Requirement’ this illustrates the OAN for the Borough based upon the latest official population projections, the Office for National Statistics’ (ONS’s) 2012 Sub-National Population Projections (2012 SNPP). The report concluded that the OAN for the Borough is 680 – 710 per annum. Depending upon the inclusion of UPC.

2.8 The report states that the OAN is within an acceptable tolerance range (5%) of the CS target and therefore this remains appropriate.

Geographic Coverage

2.9 National Guidance states that the assessment should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. The appropriate settlements were selected from the Settlement Hierarchy set out in Policy CS02 of the CS. CS02 orders settlements based on their role and function in the Borough.

2.10 To align the HELAA with Policy CS02 from the CS and minor amendments to this policy as outlined by The SADMP Pre-Submission document, only sites in the higher order settlements were assessed in the HELAA, see Table 3, as these are generally the most sustainable locations for growth. The higher order settlements have the greatest potential to balance new housing with services, employment, facilities and infrastructure, compared to the more remote, smaller rural villages and hamlets and the wider countryside.

Table 3. Settlement Hierarchy (settlements surveyed in the HELAA)

Sub-regional centre		
King's Lynn, including West Lynn		
Main towns		
Downham Market	Hunstanton	
Settlements adjacent to King's Lynn and the main towns		
North Wootton	West Winch	
South Wootton	Wisbech Fringe (Inc. Walsoken)	
Key Rural Service Centres		
Brancaster with Brancaster Staithe/Burnham Deepdale	Emneth	Snettisham
Burnham Market	Feltwell with Hockwold-cum-Wilton	Stoke Ferry

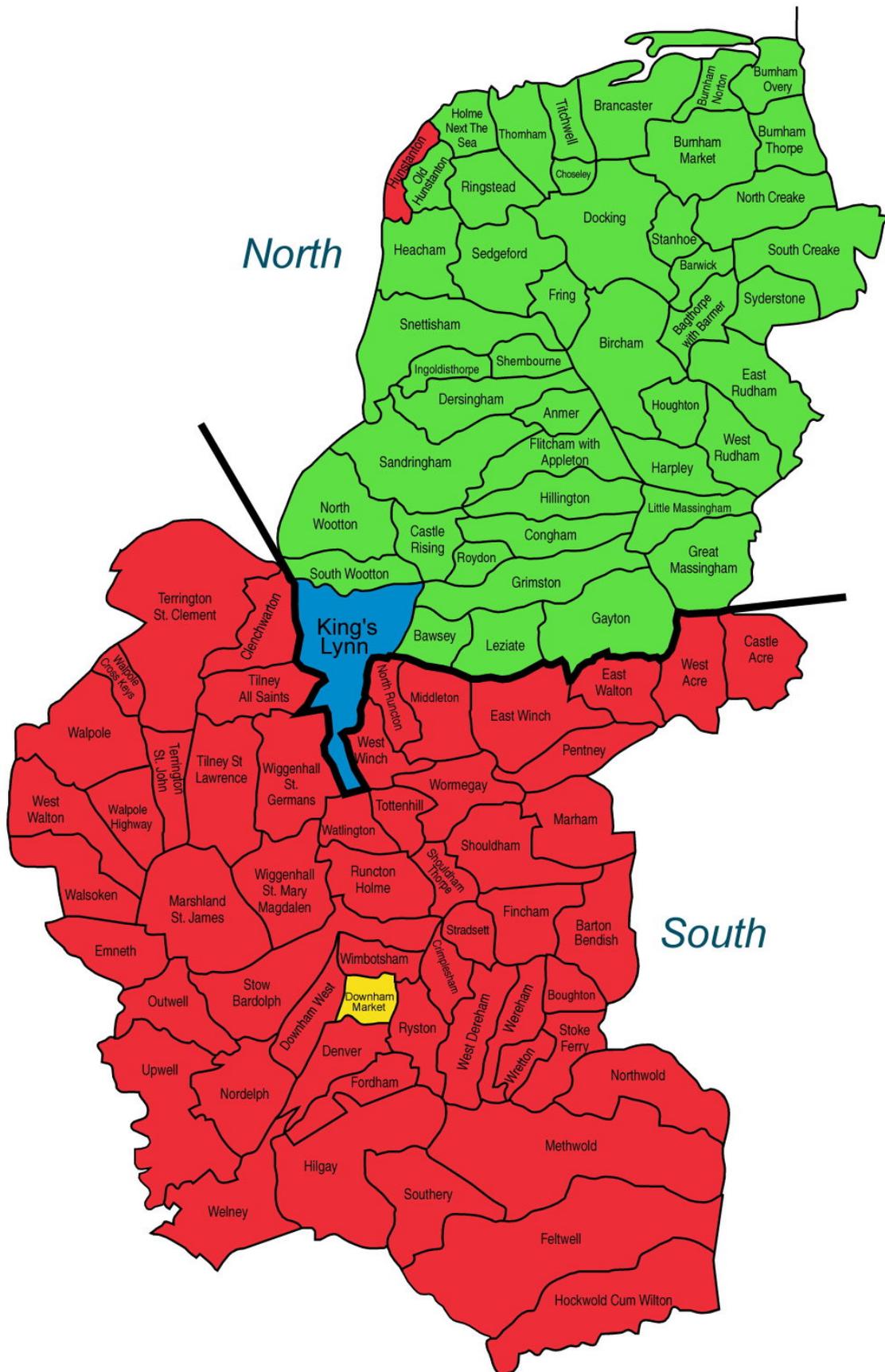
Castle Acre	Great Massingham	Terrington St Clement	
Clenchwarton	Grimston/Pott Row with Gayton	Terrington St John with St Johns Highway/Tilney St Lawrence	
Dersingham	Heacham	Upwell/Outwell	
Docking	Marham	Watlington	
East Rudham	Methwold with Northwold	West Walton/West Walton Highway	
Rural Villages			
Ashwicken	Harpley	Sedgeford	Walpole Cross Keys
Burnham Overy Staithe	Hilgay	Shouldham	Walpole Highway
Castle Rising	Hillington	Southery	Walpole St Peter/Walpole St Andrew/Walpole Marsh
Denver	Ingoldisthorpe	Syderstone	Welney
East Winch	Marshland St James/St John's Fen End with Tilney Fen End	Ten Mile Bank	West Newton
Fincham	Middleton	Three Holes	Wiggenhall St Germans
Flitcham	Old Hunstanton	Thornham	Wimbotsham
Great Bircham/ Bircham Tofts	Runcton Holme	Tilney All Saints	Wormegay

2.11 The Borough of King's Lynn and West Norfolk covers approximately 550 square miles making it a considerable area to survey. In order to make the survey manageable, the Borough was artificially divided into five different areas:

- King's Lynn (including West Lynn)
- Downham Market
- Hunstanton
- North (all other settlements in the northern area of the borough)
- South (all other settlements in the southern area of the borough)

2.12 The 5 different survey areas are illustrated on the map overleaf.

West Norfolk Parishes



Time Period Covered

2.13 The HELAA will assess the housing potential of sites over the next 15 years, 2014 - 2029. This goes beyond the current plan period, 2001 – 2026.

Site Size Thresholds

2.14 For the purpose of this HELAA, a minimum site dwelling delivery potential of 5 is used, this reflects the SADMP Pre-Submission document which seeks to allocate sites with a minimum of 5 dwellings. Sites that can only deliver less than 5 dwellings mainly arise from small infill sites, conversions or change of use and are considered to be too small to be candidates for allocation in plan documents.

Site Identification for Potential

2.15 This HELAA builds upon previous SHLAA's, and as such encompasses the following identified sites:

2.16 The 2008 SHLAA identified sites from a variety of sources, including:

- Vacant and derelict land and buildings
- Surplus public sector land
- Land in non-residential
- Additional housing opportunities in established residential areas
- Urban extension sites
- Sites in the planning process including unimplemented Local Plan allocations for housing and employment and unimplemented permissions

2.17 Two additional sources of sites were identified for inclusion in the 2011 assessment:

- Sites identified in the Borough Council's Town Centre Strategy for King's Lynn including potential regeneration sites.

- Land submitted for consideration as part of the 'call for sites' in the Site Specific Allocations and Development Policies Development Plan Document.

2.18 Two further sources of sites have been identified for inclusion in the 2014 HELAA assessment:

- Land submitted for consideration as part of the 'Issues and Options Consultation' in the Site Specific Allocations and Development Policies Development Plan Document.
- Land submitted for consideration as part of the 'Preferred Options Consultation' in the Site Specific Allocations and Development Policies Development Plan Document.

2.19 The HELAA 2014 therefore includes information on the sites assessed in the 2008 and 2011 SHLAAs as well as assessing new sites suggested through both the Issues and Options - and Preferred Options Consultation.

2.20 Site details that are received through the final representation stage of the SADMP will be assessed in the next update of the HELAA.

Desktop Review of Existing Information and Surveys

2.21 For the 2014 HELAA, an extensive desk based review was undertaken examining sites from the above sources.

2.22 The potential sites in the first two sources have already been surveyed and those newly identified for inclusion within the 2014 HELAA have been visited during the process of the SADMP Pre-Submission document.

2.23 For those sites allocated within the SADMP Pre-Submission document their owners/agents were contacted and a deliverability form completed that identifies their intention to develop the site, highlights any known constraints to development and provides an anticipated timescale for the commencement of development.

2.24 In total over 1,300 sites were put forward for consideration, meaning there was a considerable amount of choice of potential housing land in the assessment. For this

reason it was considered unnecessary to undertake a further call for sites or desk top trawl of other sources of sites.

- 2.25 All sites were subject to a desktop suitability exercise to identify any significant constraints to development (detailed in Assessing Suitability of Housing). Any site which was identified as being wholly constrained in stage 1 of the suitability assessment was not visited so as to concentrate efforts on sites which had a greater potential for housing development.
- 2.26 An extensive survey of all submitted sites which had progressed to stage 2 of the suitability assessment was undertaken for both of the previous versions of the SHLAA and during the formulation of the SADMP. Newly submitted sites that had been visited during The SADMP process, that progressed to stage 2 of the suitability assessment were re-visited and surveyed for HELAA purposes (see appendix 1 for a copy of the site survey form). Key information was recorded on the site form; this information was used to aid the assessment of the suitability and achievability of each site for housing.
- 2.27 Findings from the surveys were entered into a database, which forms the basis for reporting. This database was created to offer a clear, structured and consistent method of assessment for all sites and to limit the application of irregular, subjective assumptions. It was designed as a first-stage tool to inform how the site could be developed, what would need to be done to achieve a successful development and when it might come forward. It can also be used as part of the qualitative consideration of all the available evidence. For instance a site may be acceptable in planning terms but the market or other site-specific constraints may impede delivery.
- 2.28 Statutory Consultees and Other Organisations:
- Anglian Water
 - Environment Agency
 - Internal Drainage Board (Ely, King's Lynn, Downham Market, Southery)
 - Norfolk County Council
 - Neighbouring local authorities including neighbouring county councils
 - Norfolk Wildlife Trust
 - Middle Level Commissioners

2.29 A map of all submitted sites was provided to the statutory consultees and other organisations listed above for their consideration and comment, as part of previous SHLAA and SADMP processes. These consultations enabled statutory consultees and other organisations to consider all sites and to enable them to indicate any issues or even preferences for sites in the areas surveyed. Sites were only excluded solely on the basis of responses if the issue raised was critical. Comments were often noted and used to assist scoring sites on certain criteria, where applicable. Sites where assessment parameters are not met (such as falling within constrained locations or in unsustainable locations) have been excluded from the assessment.

Stage 2 – Site / Broad Location Assessment

Estimating the Development Potential of Each Site

2.30 In order to estimate the housing potential of each site, an assessment of its developable area needs to be made. There are a number of factors which may influence the developable area of a site. Limiting factors considered in assessing the sites suitability are explained in more detail later in this document, they can include topography, irregular shaped plots and site specific constraints such as underground services or flood zones. Guidance suggests that the capacity of a constrained site can be calculated by producing an optimum site layout plan that takes account of all constraints. In each case the optimum site layout would only include the unconstrained area therefore that part of the site which lies within a constrained area has been excluded from the developable area.

2.31 Allowance has been made on larger sites for the on-site provision of access roads, along with facilities such as green infrastructure and community uses, to serve the development. The assumptions used in calculating net developable areas are set out below and are those used in the previous SHLAA. Whilst this approach is considered robust and appropriate for the purposes of this study, it should be noted that the net developable area is an indicative figure and that the Council will negotiate appropriate non-housing provision on a site-by-site basis when considering future development proposals.

Table 4. Site Developable Area

Gross site area	Net developable area
Less than 0.4 ha	100% of developable area
0.4 ha to 2 ha	90% of developable area
Sites over 2 ha	75% of developable area

2.32 A range of density multipliers have been applied in order to assess the housing potential of each site. These multipliers are set out in the table below. It should be noted that the densities indicated are expressed as net densities (dwellings per hectare) that a site could deliver. The multiplier applied to each site is that which, in the opinion of the Council, best reflects:

- the character of the area;
- the type or mix of housing that would be appropriate on the site, and;
- the site’s proximity to a defined centre and to services.

2.33 The density multiplier has been based on the average density of approved developments in each settlement identified in Council monitoring information. These density multipliers were developed for four key types of area: Sub Regional Centre; Main Town; Key Rural Service Centre; and Rural Village. Following the identification of a proposed development density, the yield for each site is calculated by multiplying the net site area by the density.

Table 5. Site Density

Location	Density Multiplier (Dwellings per hectare)
King’s Lynn (Sub Regional Centre)	39
Downham Market, Hunstanton and Wisbech Fringe (Main Town)	36
Key Rural Service Centres	24
Rural Villages	24

2.34 Clearly the densities applied to sites are indicative and are provided solely for the purposes of this HELAA. They should not be taken to be a statement of Council policy on the amount of housing that a given site may accommodate, which will need to be determined through the planning application process.

2.35 The guide number of dwellings sought in the settlement – i.e. the same proportion of the 660 dwellings allocated to Key Rural Service Centres as the settlement's population. The table below indicates the guide number of dwellings sought in each settlement established using the 2011 Census, Parish population figures. The Local Planning Authority has agreed not to allocate less than five dwellings on any one site, so where the figure falls below this number it is increased to five.

Table 6. Guide Number of Dwellings

Settlements	Allocated dwellings	2011 population	Pop. as proportion of all Key Rural Settlements	Guide number of dwellings based on population
Key Rural Service Centres				
Brancaster with Brancaster Staithe/Burnham Deepdale	15	797	2%	11
Burnham Market	32	877	2%	12
Castle Acre	15	848	2%	11
Clenchwarton	50	2,171	4%	29
Dersingham	30	4,640	9%	62
Docking	20	1,200	2%	16
East Rudham	10	541	1%	7
Feltwell & Hockwold	70	4,020	8%	54
Gayton/Grimston/Pott Row	46	3,412	7%	46
Great Massingham	12	902	2%	12
Heacham	66	4,750	10%	63
Marham	50	3,531	7%	47
Methwold/Northwold	45	2,587	5%	35
Snettisham	34	2,570	5%	34
Stoke Ferry	27	1,020	2%	14
Terrington St Clement	62	4,125	8%	55
Terrington St John/St John Highway/Tilney St Lawrence	35	2,467	5%	33
Upwell/Outwell	80	4,833	10%	64
Watlington	32	2,455	5%	33
West Walton/Walton Highway	20	1,731	3%	23
Total	751	49,477	100%	660

Rural Villages				
Ashwicken	0	592	3%	5
Burnham Overy Staithe	0	134	1%	1
Castle Rising	0	216	1%	2
Denver	0	890	4%	8
East Winch	10	779	3%	8
Fincham	5	496	2%	5
Flitcham	0	276	1%	3
Great Bircham/Bircham Tofts	10	448	2%	4
Harpley	5	338	1%	3
Hilgay	12	1,341	6%	12
Hillington	5	400	2%	4
Ingoldisthorpe	10	849	4%	8
Marshland St James/St Johns Fen End	25	1,336	6%	12
Middleton	15	1,450	6%	13
Old Hunstanton	0	628	3%	6
Runcton Holme	10	657	3%	6
Sedgeford	10	613	3%	6
Shouldham	10	605	3%	5
Southery	15	1,324	6%	12
Syderstone	5	445	2%	4
Ten Mile Bank	5	382	2%	3
Three Holes	5	390	2%	4
Tilney All Saints	5	573	2%	5
Thornham	0	496	2%	5
Walpole Cross Keys	0	518	2%	5
Walpole Highway	10	701	3%	6
Walpole St Peter/Walpole St Andrew/Walpole Marsh	20	1,804	8%	16
Welney	20	542	2%	5
Wereham	8	859	3%	8
West Newton	0	228	1%	2
Wiggenhall St Germans	0	1,373	6%	12
Wiggenhall St Mary Magdalen	10	729	3%	7
Wimbotsham	0	664	3%	6
Wormegay	0	359	2%	3
Total	230	23,435	100%	213

2.36 As outlined within the SADMP Pre-Submission document Emneth is now classed as a Key Rural Service Centre. This results in Emneth having a guide number of dwellings based on a population of 36.

2.37 Where site-specific evidence of likely build out rates existed this was used to aid estimates of the housing potential. Elsewhere the following assumptions were made:

- Up to 25 dwellings – assumed to be completed in year 1, this number takes into account site preparation and start up tasks;
- Assume average build out rate of 40 per annum per developer per site based on historic build out rates from the housing trajectory;
- Assume larger sites (200+ units) will be built out by 2 or more developers and that the average build out rate will not be doubled due to potential site issues but times 1.75 i.e.70 per annum;

2.38 Delivery/lead-in times will be influenced by planning status and by the size of a site; the following assumptions are made:

- Site with full planning permission (6 months)
- Small urban potential site or allocation without permission (up to 50 units) (1 year)
- Larger urban potential or extension site allocation without permission (50+ units) (18 months)
- Large urban extension site that may require master-plan with no planning status (5 years)

Assessing Deliverability and Developability

2.39 The aim of the HELAA is to identify all potentially deliverable and developable housing sites in the Borough, irrespective of the level of housing provision that is actually needed over the plan period. To be considered:

- **Deliverable** – a site is available now, offers a suitable location for development now, there is a realistic prospect that housing will be delivered on the site within five years and that the development of the site is viable.
- **Developable** – a site should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

(NPPF 2012)

2.40 The HELAA identifies deliverable and developable sites by subjecting each site to a thorough assessment process. The assessment process is split into three parts, assessing suitability, availability and achievability for housing. This is explained in the following sections.

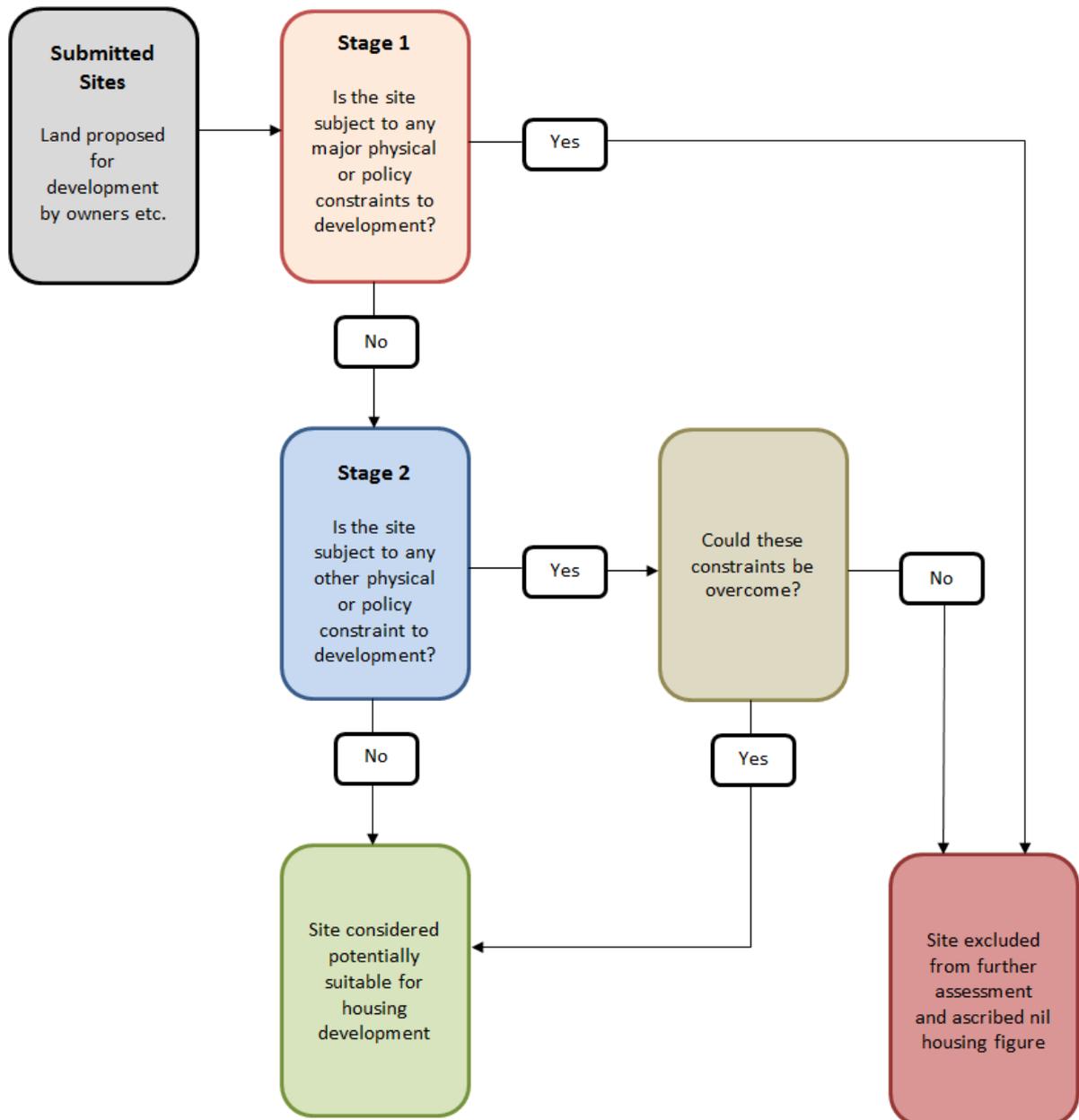
Assessing Suitability for Housing

2.41 The suitability of each site was assessed by scoring sites against a broad range of sustainability criteria. Suitability criteria have been adapted from the Regulation 25 Site Specific Allocations and Policies Development Plan Document (DPD) which was subject to public consultation in May 2009. The suitability criteria were developed in conformity with the key sustainability objectives outlined in the Borough's Sustainability Appraisal framework¹. The original sustainability objectives were developed as a set of measurable criteria which are used to appraise plans and policies to determine whether they promote environmental, economic and social sustainability. The original sustainability objectives are quite broad in scope which necessitated the development of more specific, measurable suitability criteria for the purpose of the SADMP and this assessment.

2.42 The majority of sites put forward for consideration in this HELAA are already within the planning process (i.e. have been considered for allocation within the SADMP Pre-Submission document), and therefore have been assessed by officers to determine their suitability for development. In order to examine such a large number of sites efficiently, the assessment of suitability was split into two stages. Sites which were wholly constrained were identified and excluded from the outset at Stage 1. Sites which were not wholly constrained, or where constraints could be mitigated were subject to a more rigorous assessment to determine their potential suitability for housing in Stage 2. The two stage process is illustrated in the diagram below and the methodology is described in detail in the following sections.

¹ Sustainability Appraisal Scoping Report (2005) '*Sustainability Appraisal Objectives*' page 94-104

Diagram 1. The Two Stage Suitability Assessment



2.43 The results are recorded in an assessment matrix which utilises symbols to illustrate whether a site is affected by any one criterion. The symbols demonstrate whether the site is wholly constrained (-), partially constrained (+/-), or not constrained (+) by identified assessment criteria.

- 2.44 Any site identified as being wholly constrained by criterion in Stage 1 was automatically excluded from further assessment and was considered unsuitable for housing development. However, any site identified as being wholly constrained by criterion in Stage 2 was not automatically excluded from the assessment. In these instances the constraint was further examined to determine whether it could potentially be overcome.
- 2.45 A summary of constraints is provided for each site after Stage 1 and Stage 2 as well as information detailing how the identified constraints could potentially be overcome. For each site that has been assessed, a column details whether it is excluded from further assessment (marked by 0), or whether it is potentially suitable (marked 1).
- 2.46 Sites which are excluded from either Stage 1 or Stage 2 of the suitability assessment may be re-examined in any subsequent review of the King's Lynn and West Norfolk HELAA provided there is evidence that circumstances have changed.
- 2.47 The suitability assessment of all sites can be viewed as part two.
- 2.48 **Suitability Assessment: Stage 1** - The suitability criteria have been developed to address the most significant policy restrictions, physical limitations, potential impacts and environmental conditions which would affect the suitability of the site for housing. Failing any of these criteria would compromise the ability for the site, if developed for housing, to contribute to creating sustainable, mixed communities. Therefore, such sites do not necessitate more detailed assessment. The Stage 1 criteria are detailed in Table 7 on the following page.

Table 7. Site Assessment Criteria – Stage 1

Site Assessment Criteria – Stage 1					
Site Assessment Criteria		Scoring system			Reasoned explanation
		+	+/-	-	
Policy	Is the site well related to existing settlements?	Yes	N/A	No	Any site that is further than 25m from a settlement boundary (as proposed in the Site Allocations and Development Management Plan Pre-Submission Document Policies Map and insets) of the higher order settlements is not considered to be well related to an existing settlement. Developing housing in locations further than 25m from a settlement is likely to encourage car use rather than promote use of sustainable forms of transport, could contribute to urban sprawl and is more likely to encounter difficulties when connecting to existing infrastructure.
	Is the site at risk of flooding? (flood zones tidal and fluvial 2 or 3 and hazard zone, predicted scenario 2115)	No	part of site	Yes	In accordance with the sequential test set out in the National Planning Policy Framework, areas which are not at risk of flooding were considered preferentially, over areas with a designated risk of flooding. Any site which is wholly in flood zone 2 or 3 and/or the hazard zone were excluded in stage 1 of the assessment, this ensures that development is directed to the least constrained areas of settlements. However, in instances where whole settlements are at risk of flooding and following consultation with the Environment Agency, the Borough Council considers the need for additional housing in these settlements to help support existing facilities justifies housing allocation notwithstanding the flood risk. In terms of the sequential test (see NPPF paragraph 101), the housing required in these settlements cannot be allocated
Flood Risk					

					in a lower degree of flood risk because the whole of the settlement is subject to such risk and there are no alternative lower risk sites available. In terms of the exceptions test (see NPPF paragraph 102), the Borough Council judges the benefits outweigh the flood risk in supporting sustainability of the services and community of these settlements outweigh the flood risk. In accordance with the NPPF development of such sites will be subject to a site specific flood risk assessment, see DM 21: Sites in Areas of Flood Risk (page 65 of the Site Allocations and Development Management Policies Pre-Submission Document). Exception was also taken to sites in King's Lynn, because of the imperative for growth and regeneration in this settlement.
Natural Environment	Is the site within international or national designated protected areas? (National Nature Reserve, Ramsar, Special Protection Areas SPA, Special Areas of Conservation SAC, Sites of Special Scientific Interest SSSI)	No	N/A	Yes	To prevent harm to environmentally protected areas, any site within or partially within designated areas has been excluded from the assessment in Stage 1. In accordance with existing policy on the Breckland SPA (protecting Stone Curlews), sites within Feltwell and Hockwold cum Wilton which are surrounded by built development on all sides have progressed to stage 2 of the suitability assessment.
Historic Environment	Will the development impact upon identified areas of heritage value? (Ancient Monuments, Parks and Gardens of Historic Interest)	No	N/A	Yes	In order to protect areas of historic importance, any site that falls within a designated area of heritage value has been excluded from the assessment at Stage 1.

2.49 **Suitability Assessment: Stage 2** - The purpose of stage 2 is to identify any other constraints which may impact upon the development of housing on the site and to assess what measures, if any, would be necessary to overcome constraints. Stage 2 criteria were adapted from the Regulation 25 Site Specific Allocations and Policies Development Plan Document (DPD) which was subject to public consultation in May 2009. The criteria have been developed to address all other constraints to development which were not considered in Stage 1. The twenty Stage 2 criteria are detailed in Table 8, on the next page.

Table 8. Site Assessment Criteria – Stage 1

Site Assessment Criteria - Stage 2				
Site Assessment Criteria		Scoring system		
		+	+/-	-
Scale of development	Is the scale of development on the site appropriate to the type of town / village identified in the settlement hierarchy?	Yes	No – only part of site appropriate	No
Brownfield / Greenfield	Is the site brownfield land (previously developed land)?	Yes	Part of site	No
Safeguarded areas	Is the site located in a safeguarded area? (airfield safeguarding zone, preferred site for minerals or waste development)	No	yes - part of the site	Yes
Height / Shape	Is the height and shape of the land suitable to develop upon?	Yes	Yes - part of site	No
Historic Environment	Could development of the site potentially have an impact on the historic environment? (Listed Building / Archaeologically Sensitive Area / Conservation Area)	No	Yes - part of site	Yes

Highways	Could development impact negatively on the local highways network?	No	Potentially	Yes
Major Utilities	Is there any major utilities infrastructure on the site which could compromise housing development? (high pressure gas pipelines, electricity pylons, wind turbines)	No	Yes - part of site	Yes
Environmental Designations	Is the site within a County Wildlife Site / Roadside Nature Reserve or Area of Outstanding Natural Beauty?	No	Part of site	Yes
Tree Preservation Order (TPO)	Is the site subject to a Tree Protection Order (Woodland, Group, Area or individual TPO)	No	Part of site	Yes
Biodiversity	Could development of the site impact negatively on local biodiversity?	No	Potentially	Yes

Landscape / Townscape	Could development of the site impact negatively on the landscape and/or townscape?	No	Potentially	Yes
HSE Hazard	Is the site within a designated 'Health and Safety Executive Hazard Area'?	No	Part of site	Yes
Pollution / Contamination	Is the site contaminated and/or within close proximity of an identified source of pollution? (Cordon Sanitaire, Air Quality Management Area, industrial, light, noise, vehicular)	No	Part of site	Yes
Community Facilities / Open Space	Would housing development on the site result in a loss of community facilities and / or publicly accessible open space	No	Part of site	Yes
Amenity	Would development on the site impact negatively upon the amenity of the existing community or future potential residents?	No	Potentially	Yes
Walking / cycling access to facilities	Are services easily accessible by walking / cycling from the site?	Yes	Yes – but access could be improved	No

Access to open space	Is the site within close proximity of publicly accessible open space	Yes	Part of site	No
Public Right of Way (PROW) / Bridleway	Is there a Public Right of Way and / or Public Bridleway on the site?	No	Part of site	Yes
Employment	Would housing development on the site result in a loss of land for employment uses?	No	Part of site	Yes
Agricultural Land	Would development of the site result in the loss of useable high quality agricultural land (Grade 1 – 3)?	No	Part of site	Yes

Assessing Availability for Housing

- 2.50 The Borough Council assumed that a site would be available for development unless there was evidence to the contrary. Evidence was gathered by a section of the Site Proposal Forms completed during the consultation stages in the Site Specific Allocations and Policies DPD and a section of the Site Deliverability Form issued for the SADMP Pre-submission document's Site Allocations. Respondents were asked to fill in details of their interest in the land (owner, agent, planning consultant or other) and the likely timescale for development (within next 5 years, 6-10 years, 11-15 years).
- 2.51 Landowners have the opportunity to retract any site in instances where incorrect information on legal ownership has been provided. Landowners may also be consulted where officers have indicated that only part of their site is suitable to verify whether they would still consider developing a reduced portion of their land. The assessment is a live document and will be published annually; therefore there is scope to amend details with receipt of further information, or if they have been incorrectly provided.

Assessing Achievability for Housing (Including Viability)

- 2.52 Achievability is measured by how likely the prospect is that at a particular point in time housing will be developed on that site. Essentially this is a test of the economic viability of the site, and thus can be split into two parts – market assessment and cost assessment.
- 2.53 Sites were generally not excluded based on the assessment of achievability, as it is relative – with unlimited money almost any available and suitable site could be developed. This part of the assessment helped significantly with the estimation of when a site could be developed. Sites with a low market value and a high cost to develop would be put into later time brackets for development, (6-10 years or 11-15 years) providing there was no evidence to the contrary. Only when there was evidence that funding for a redevelopment project had been cut indefinitely would a site be excluded on the basis of the achievability assessment.
- 2.54 The market and cost assessments were given a high, medium or low rating. For the market assessment the optimum outcome was a rating of high, for the cost assessment the optimum outcome was low. Whilst it was possible to view the majority

of the sites, we did not inspect those on private restricted land and those where access was difficult.

Market Assessment

2.55 The market assessment was based on two main factors: location/surroundings and site specific factors.

2.56 Higher values were given in areas where there was significant market demand and generally higher property values in the surrounding area. Higher values were also given if sites had a good outlook and were in close proximity to good quality recreational open space (both formal and informal, such as edge of greenbelt locations). Essentially the judgement of whether a site achieved a higher rating was based on whether there was likely to be a high market demand for housing at that location, which would encourage landowners to bring forward housing on that site.

2.57 Lower values were generally applied in areas where there was a significant amount of lower value housing. Lower values were also given to sites which were far from open green space and in areas where there was little market demand.

2.58 Factors affecting the market value of a site also included site specific factors which were judged on site visits and using desk based information and aerial mapping. Lower values were generally given if sites were likely to be subject to any form of pollution; visual, smells, noise and air quality, such as being adjacent to a train track or being close to, or within a large industrial area. Such factors are highly likely to affect the marketability of a site.

Cost Assessment

2.59 The cost assessment was based on three main factors: site uses, ownership and site-specific factors.

2.60 Higher costs were generally applied where there were heavy, dirty or industrial uses on site, or where there was evidence to suggest there may have been in the past, due to the likely costs involved in remediating such sites to a residential standard.

- 2.61 Medium costs were generally applied to any site with evidence of contamination, for example sites used as fuelling stations or with some form of underground storage of chemicals or waste, due to higher potential costs for cleaning the site.
- 2.62 Low costs were generally applied to any cleared sites, and those being used for relatively benign uses such as for car parking as well as for undeveloped open/green spaces or allotments.
- 2.63 Higher costs were applied to sites with identified issues concerning ownership of the site, for example where ransom strips had been identified where acquisition of the land is possible but at an elevated cost. Higher costs were given to large areas of land and strategic housing sites with multiple landowners or developer interests. Such sites are likely to require significant cost to come forward through the production of supporting material, master plans, consultation and developer contributions for infrastructure.
- 2.64 Any site specific factor which would affect the ability to develop the site efficiently would trigger a medium to high cost rating. For example: sites with sloping profiles or uneven topography were generally given at least a medium cost rating due to the higher costs involved in either levelling or using construction equipment on uneven sites. Factors which affect construction of the site were also considered: such as the presence of multiple protected trees on a small site or a power line in the case where it would require moving. Sites which had been cleared or land which had been remediated were generally given a low cost rating as the sites were immediately ready for development.

Overcoming Constraints

- 2.65 Constraints to development were noted when considering the suitability of the site, and actions to overcome constraints were identified. In some cases identified actions were considered to fundamentally affect the achievability of the site (cost to develop); therefore even where actions to overcome constraints have been identified, this does not necessarily mean that the site is deliverable and developable

Stage 3 – Windfall Assessment

- 2.66 Allowances are made for windfall from large and small sites based on compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The allowances are realistic, taking account of historic windfall delivery rates and do not include residential gardens. This complies with the NPPF, paragraph 48.
- 2.67 In 2013/14 only 30% of recorded housing completions were from sites that had planning permission five years earlier. There were 3,958 completions from windfall sites between 2001 and 2014, out of a total of 8,093 completions (49% of the total completions).
- 2.68 Windfall completions 2001-14 totalled 3,958. This is comprised of large unallocated (windfall) sites (10 or more dwellings) 2,327 (59% of the total windfall completions) and small unallocated (windfall) sites (less than 10 dwellings) 1,631 (41% of the total windfall completions).
- 2.69 Windfall on large sites contributed an average of 179 completions per annum 2001-14 and windfall on small sites contributed an average of 125 completions per annum over the same time period.
- 2.70 The Council's large site windfall allowance is 134 p.a. The Council's small site windfall allowance of 94 p.a. is based purely on the past rate of small brownfield site windfalls. Both the large and small windfall rates are based on 75% of the past trend, recognising that there may be some reduction in the future.
- 2.71 The stock of small site permissions is continually replenished and will be added to in the future as the Council adopts a new policy to allow infilling in the smaller villages and hamlets category of settlements within the hierarchy, Policy DM3 in the SADMP Pre-Submission document.
- 2.72 The approach with regard to the allocation of sites within the SADMP process, with the exception of King's Lynn, has been to allocate sites that are outside of settlement development boundaries. This will still allow large and small windfall sites to come forward within the development boundaries as the geographic area within the development boundary hasn't been reduced by allocations

within the SADMP. The Council therefore is of the belief that large windfall and small windfall sites can still come forward. Paragraph D.1.8 of the SADMP Pre-Submission document, Section D .1 distribution of development states *'it is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated sites within development boundaries (especially within towns).'*

Stage 4 – Assessment Review

- 2.73 The survey and assessment of the housing potential of each site can be viewed as part 2. Following on from this an indicative 2014 housing trajectory has been produced, this sets out how much housing development can be provided and at what point in the future by combining the sites within part 2 and those already within the planning process, this can be viewed as part 4. This demonstrates how the housing requirements established in the CS will be met and to determine whether sufficient sites have been identified to meet the housing requirement for a rolling 5 year period.
- 2.74 The HELAA will be updated annually and will be used in the updating process of the housing trajectory and 5 year housing land supply position. An annual review will offer flexibility with regard to status changes of sites, the progress of site delivery and the inclusion of newly identified sites.
- 2.75 To ensure that no site is double counted, GIS was used to check and this can be seen in the mapping as part 3 of the assessment.

Stage 5 – Final Evidence Base

2.76 Within this 2014 HELAA the following outcomes are provided:

- A table of all the sites considered is included as part 2 of this assessment; these are cross-referenced to their locations on maps, part 3;
- Within the table is an assessment of each site, in terms of its suitability for development, availability and achievability including whether the site is viable. This determines whether a site is realistically expected to be developed and when;
- More detail is contained within these tables for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- The potential type and quantity of development that could be delivered on each site, including a reasonable estimate on the build out rates, setting out how barriers to delivery could be overcome and when;
- An indicative 2014 housing trajectory of anticipated development, part 4 of this assessment;
- A summary for the borough indicating the total number of dwellings considered to be deliverable and developable for 0-5 years, 6-10 years and 11-15 years. Complete with a 5 year housing land supply. A consideration of associated risks.

Housing for Older People

2.77 Use Class C2 (residential institutions) have previously not been taken into consideration as a supply source for housing, however as per the PPG there are taken into consideration within this HELAA and three sites have been identified for inclusion:

- The SADMP allocation F2.3 Hunstanton – Land South of Hunstanton Commercial Park. An approximate 100 units
- Prime Care Site, Land Off St Peters Road, West Lynn, King's Lynn. This site has planning permission for a 150 units
- Warehouse Clearance Shops, St Edmunds Terrace, Hunstanton. Has planning permission for 32 units

Empty Housing Strategy

2.78 The Borough Council has a strategy for bringing empty housing back into use, working with Freebridge Community Housing and the HCA (Homes and Communities Agency). This accounts for 40 dwellings that have previously not been taken into account in terms of housing supply.

Rural Exception Sites

2.79 Those that already have planning permission have counted towards the housing supply. However, those that have funding had not previously been accounted for. There are two sites of this nature that are now included as part of the housing trajectory, Old Hunstanton, 15 dwellings, and Clenchwarton, 6 dwellings.

Monitoring

2.80 The HELAA is not a one off study but in line with Government guidance is a continuous piece of work. Once the initial large scale assessment has been completed it is to be updated each year, this will provide a record of the following information:

- progress with delivery of development on allocated sites with planning permission;
- planning applications that have been submitted or approved on sites identified by the assessment;
- progress that has been made in removing constraints on development and whether a site is now considered to be deliverable or developable;
- unforeseen constraints that have emerged which now mean a site is no longer deliverable or developable, and how these could be addressed;
- whether the windfall allowance (where justified) is coming forward as expected, or may need to be adjusted.

2.81 This information will also be used to update the housing trajectory and the 5 year housing land supply position.

3 . Assessment Analysis and Conclusions

Phasing

3.1 The phasing of the HELAA sites and these combined with other sources of sites has been assessed to fall into the following timescales:

Table 9: Phasing

Site Phasing	HELAA Identified Sites	All Identified Sites
0 – 5 Years	2,388 dwellings	6,214 dwellings
6 – 10 Years	4,033 dwellings	6,331 dwellings
11 – 15 Years	3,851 dwellings	5,003 dwellings
Total	10,272 dwellings	17,548 dwellings

3.2 This can be expressed as 6,214 deliverable dwellings and 11,334 developable dwellings that have been identified overall. Of this the HELAA sites make up 2,388 deliverable dwellings and 7,884 developable dwellings. In terms of site numbers the HELAA has identified 147 sites that are deliverable and 204 sites that are developable.

Indicative 15 Year Housing Trajectory

3.3 An indicative trajectory for the next 15 years of anticipated development has been produced to demonstrate when and where the level of housing supply will be delivered; to the degree it is known. This can be viewed as part 4.

3.4 Within this trajectory the sites identified by the HELAA have been split between those sites that have been chosen for allocation within the SADMP process and those that have not. These two sources of sites have then been combined with the following sources of sites:

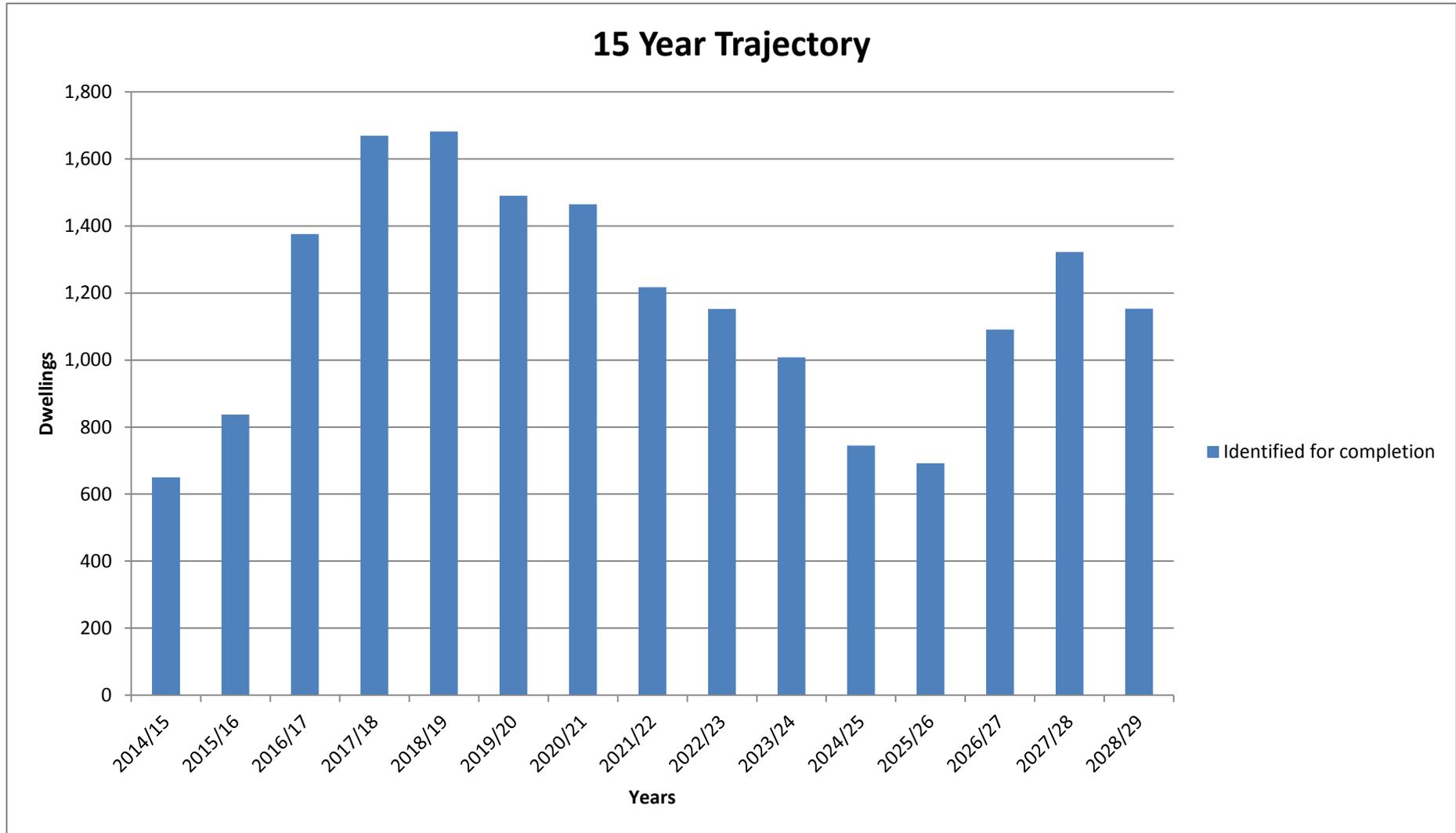
- Extant Planning Permissions on Pre-2014 Allocated Sites;
- Extant Planning Permissions which are on both Allocated and Unallocated Large Sites;
- Extant Planning Permissions on Unallocated Large Sites (10+ dwellings);

- Extant Planning Permissions on Unallocated Sites for 5 - 9 (inclusive) dwellings;
- Extant Planning Permissions Small Sites 1 - 4 dwellings;
- Residual allocated Sites (Currently allocated in Local Plan);
- Sites where principle of development accepted (lapsed planning permissions);
- Windfall Allowance; and
- Other: Class C2 Use, empties brought back into use and rural exception sites.

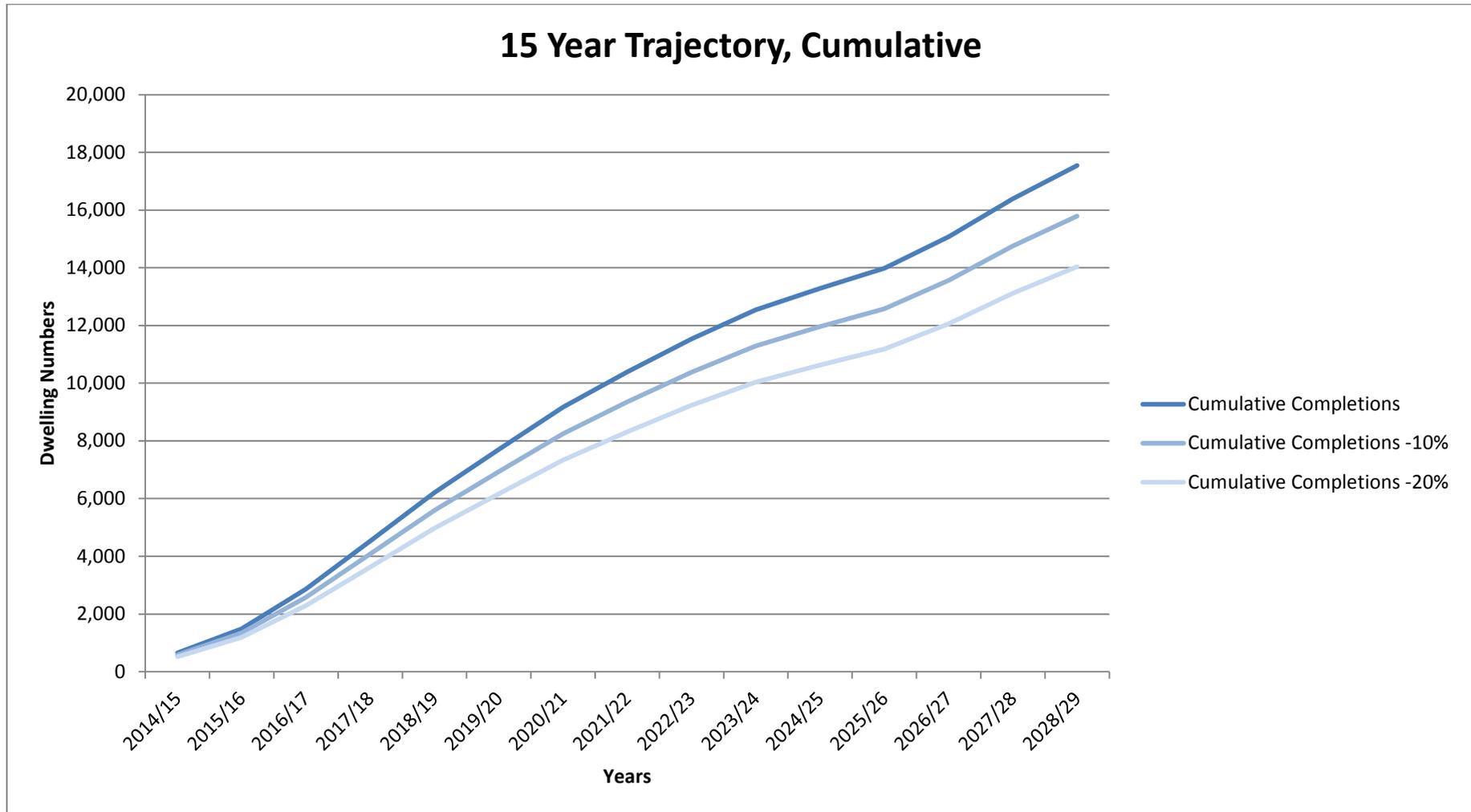
3.5 The trajectory shows that the HELAA has identified a total of 7,390 dwellings that could potentially be delivered on HELAA sites within the remainder of the plan period to 2026 and 10,272 to 2029. With 17,548 dwellings identified in total. This meets the HELAA target of 10,200 – 10,650 dwellings to 2029.

3.6 Graph 1 illustrates the number of dwellings that have been identified for completion in each of the next 15 years. Graph 2 demonstrates the dwelling numbers that have been identified for completion cumulatively, a line for a 10% and 20% reduction in the identified dwelling numbers is present. The % reduction lines are shown in order to take into account delay in completion of sites, and therefore dwelling numbers, due to constraints or circumstances that are not known at this time.

Graph 1. 15 Year Trajectory



Graph 2. Chart 15 Year Trajectory, Cumulative

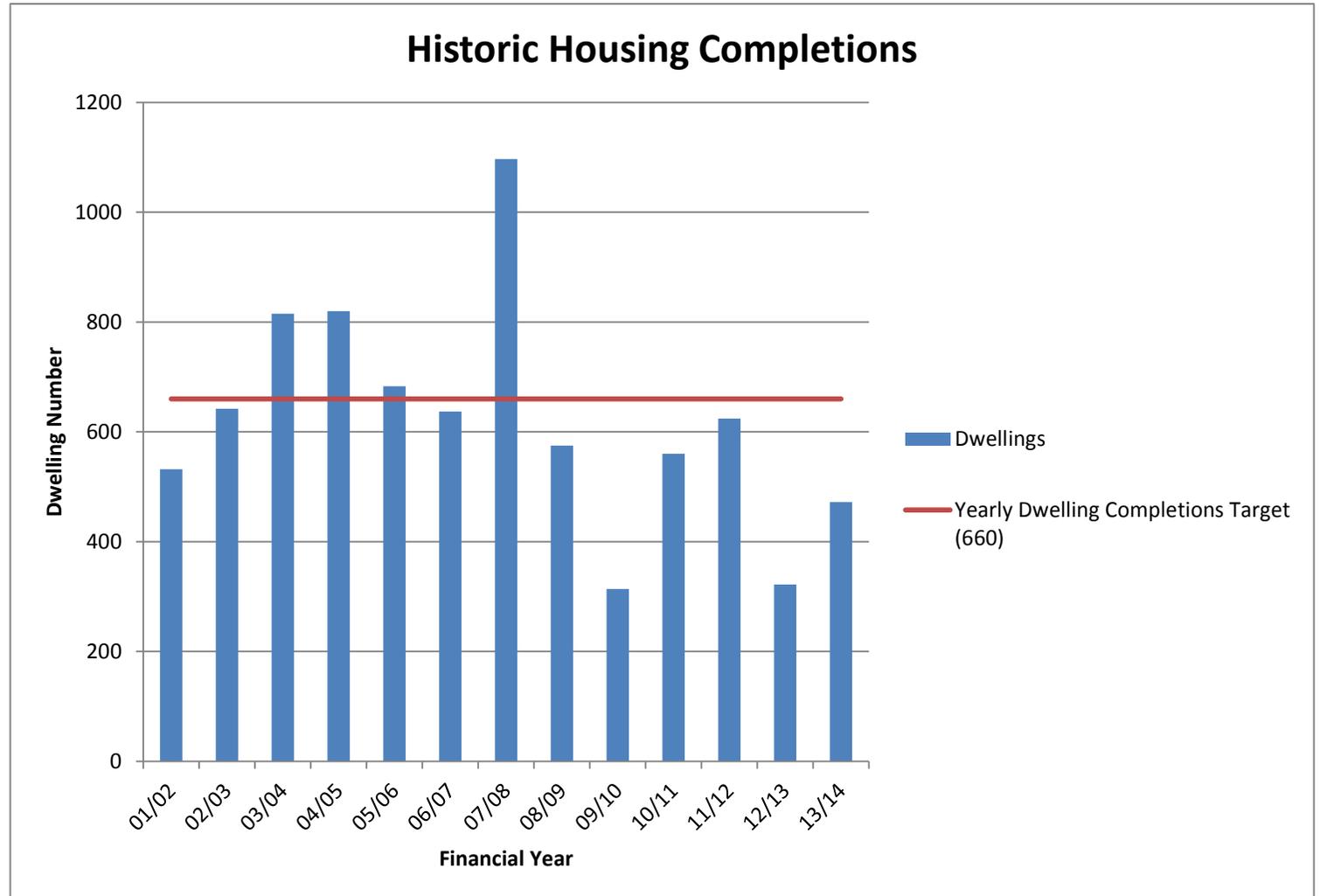


Core Strategy Housing Target

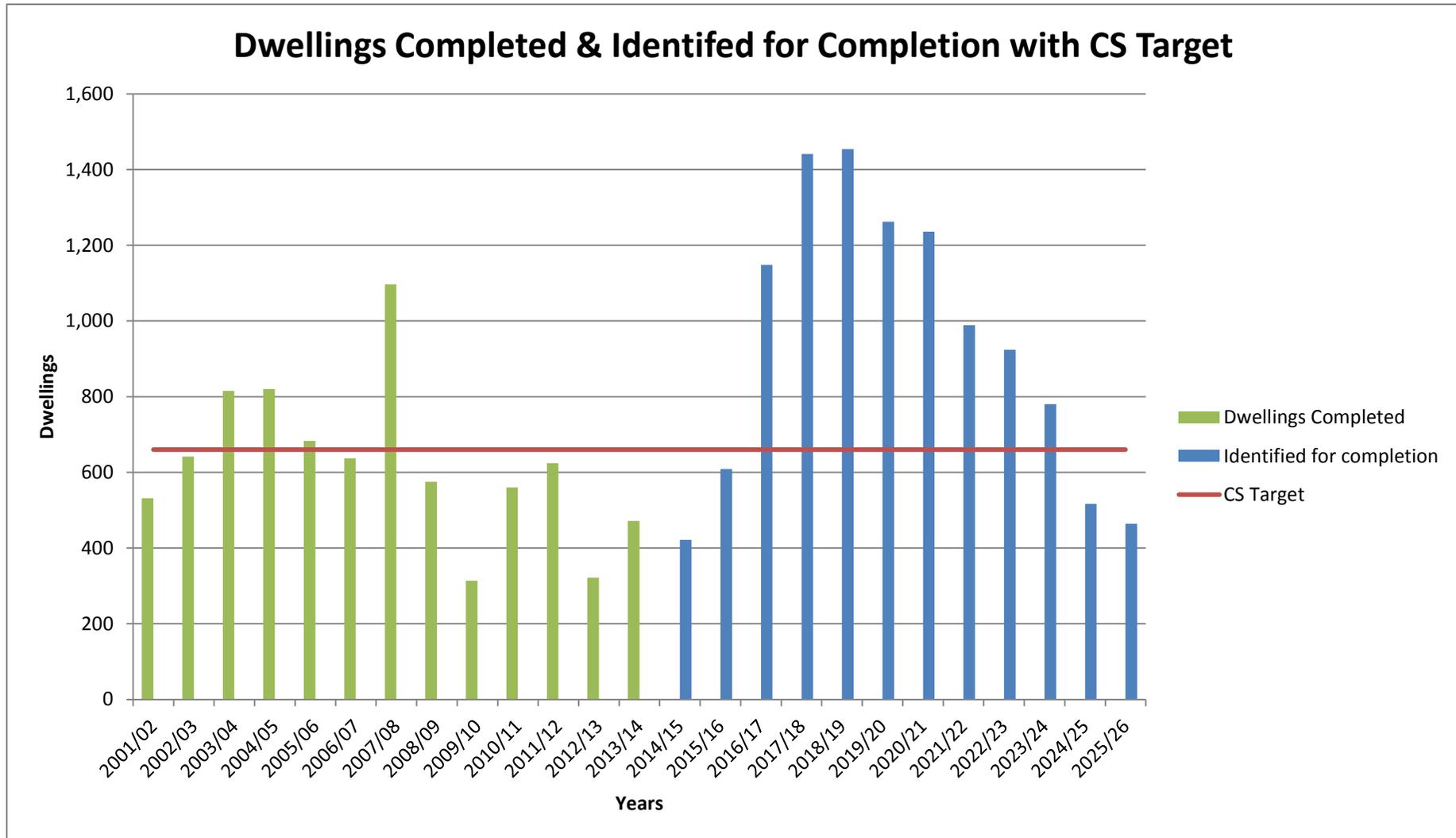
3.7 The trajectory can be used to show progress with regard to the CS Target. This is achieved by removing the justifiable windfall allowance and the HELAA sites that are not SADMP allocations, as the CS Target does not include these sources of dwelling supply, and adjusting the time frame to the plan period. The CS Target is 16,500 dwellings, to be completed by the end of the current plan period 2026. 8,093 dwellings have already been completed in the first 13 years of the plan, as illustrated by Graph 3; this leaves a target of 8,407 dwellings to be completed within the remaining 12 years of the plan. Overall the trajectory shows that there is sufficient capacity to meet this requirement with 10,345 dwellings identified for completion within this time frame (2014 - 2026). The housing target of 16,500 is exceeded as 18,438 dwellings have been identified over the plan period. This is illustrated by Graph 4 and Graph 5. Note that as previously outlined the identified supply shown in these graphs does not include windfall sites or HELAA sites that are not SADMP allocations and that the CS target allows 10% for flexibility and non-completion of commitments, etc.

Graph 3. Historic Housing Completions

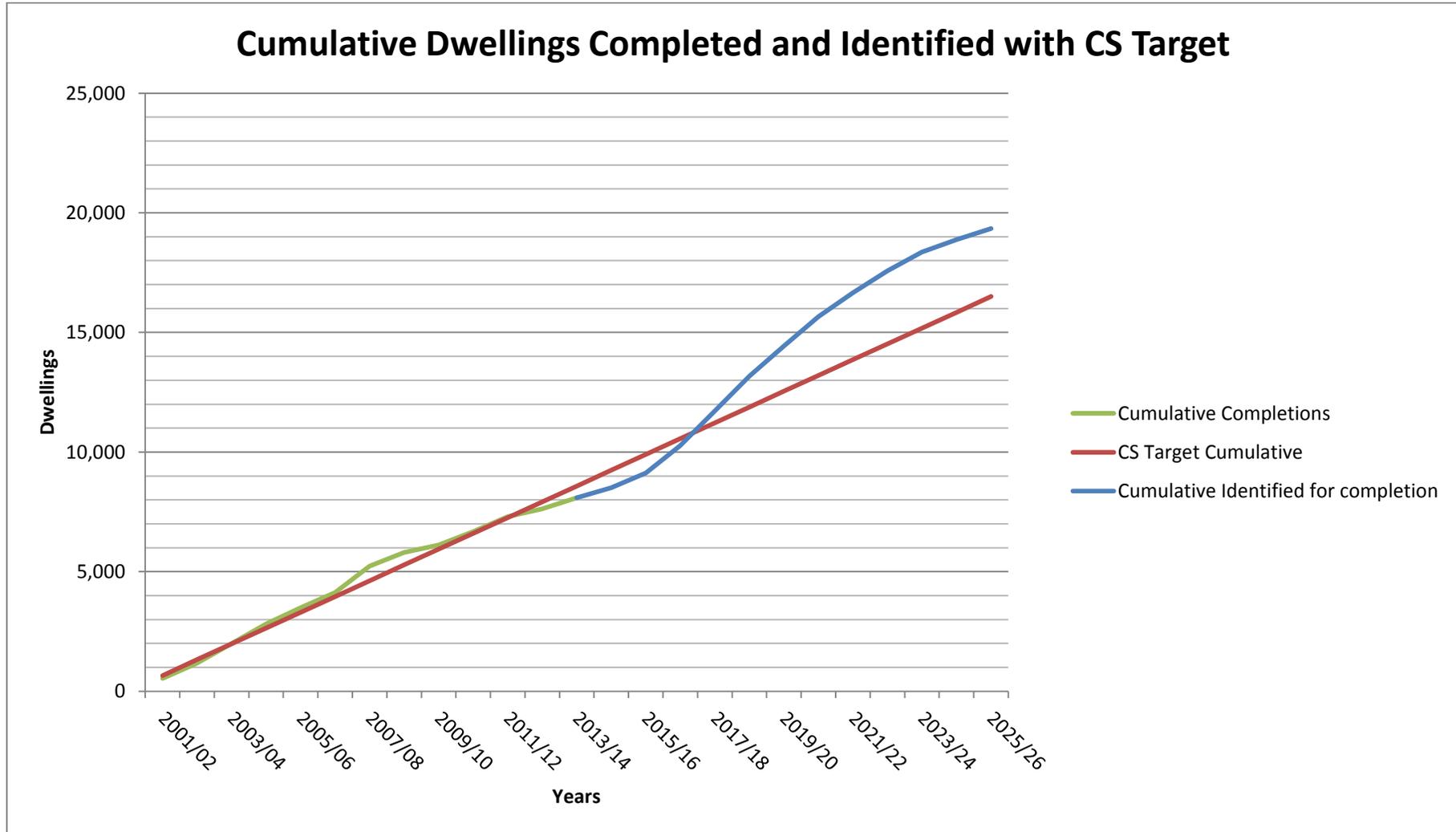
Financial Year	Dwellings
01/02	532
02/03	642
03/04	815
04/05	820
05/06	683
06/07	637
07/08	1,097
08/09	575
09/10	314
10/11	560
11/12	624
12/13	322
13/14	472
Total	8,093



Graph 4. Dwellings Completed & Identified for Completion with CS Target



Graph 5. Cumulative Dwellings Completed and Identified with CS Target



5 Year Housing Land Supply Position

- 3.8 This HELAA will assist in the demonstration of a 5 year land supply of housing on deliverable sites - as stated by the NPPF, paragraph 47.
- 3.9 The independent report produce by Neil McDonald '*Assessing King's Lynn and West Norfolk's Housing requirement*' (2015) outlines that the OAN for the Borough is 680 – 710 depending upon the inclusion of UPC.
- 3.10 The 5 year housing land supply is generated from the Council's commitments, deliverable sites and windfall allowance and therefore corresponds to the first 5 years of the HELAA and trajectory and the next 5 years of the plan period. The HELAA assists by informing the housing supply position.
- 3.11 It is important to note that developers of all sites of 10 or more units within the current plan period have been contacted in order to establish their views on likely completions over the next 5 years. Land owners/agents/developers of all sites chosen for allocation within the SADMP Pre-Submission document have also been contacted to establish their views on the likely deliverability of their sites. This information assisted in the formulation of the 5 year land supply and the anticipated completions of the allocated sites.
- 3.12 There are two widely accepted methods for calculating the 5 year land supply. The first is the Liverpool Method; this method identifies any shortfall in the number of dwellings and spreads this shortfall equally over the remaining years within the plan period, so the target is 'caught up' by the end of the plan period. The second approach is the Sedgfield Method; here any shortfall in dwelling completion numbers is spread equally over the next five years of the plan period in order to 'catch' the dwelling completion target within this five year period. Both calculation methods are required by the NPPF, paragraph 47, to contain a 5% buffer against the housing requirement.
- 3.13 Any shortfall in dwelling completions is the difference between the dwellings that have completed to date and the dwelling target to date, based upon the report '*Assessing King's Lynn and West Norfolk's Housing requirement*' that utilises the ONS's 2012 SNPP. With two figures being outlined (680-710) there are two backlog figures 626 and 566.

3.14 The table below shows the identified 5 year supply taken from the trajectory, the targets, % 5 year supply, years' supply using the two methodologies and if there was a -10% and 20% reduction in the anticipated dwelling numbers. The figures have been calculated for both an OAN of 680 (low) and 710(high) depending upon the inclusion of UPC.

Table 10: 5 Year Land Supply Position

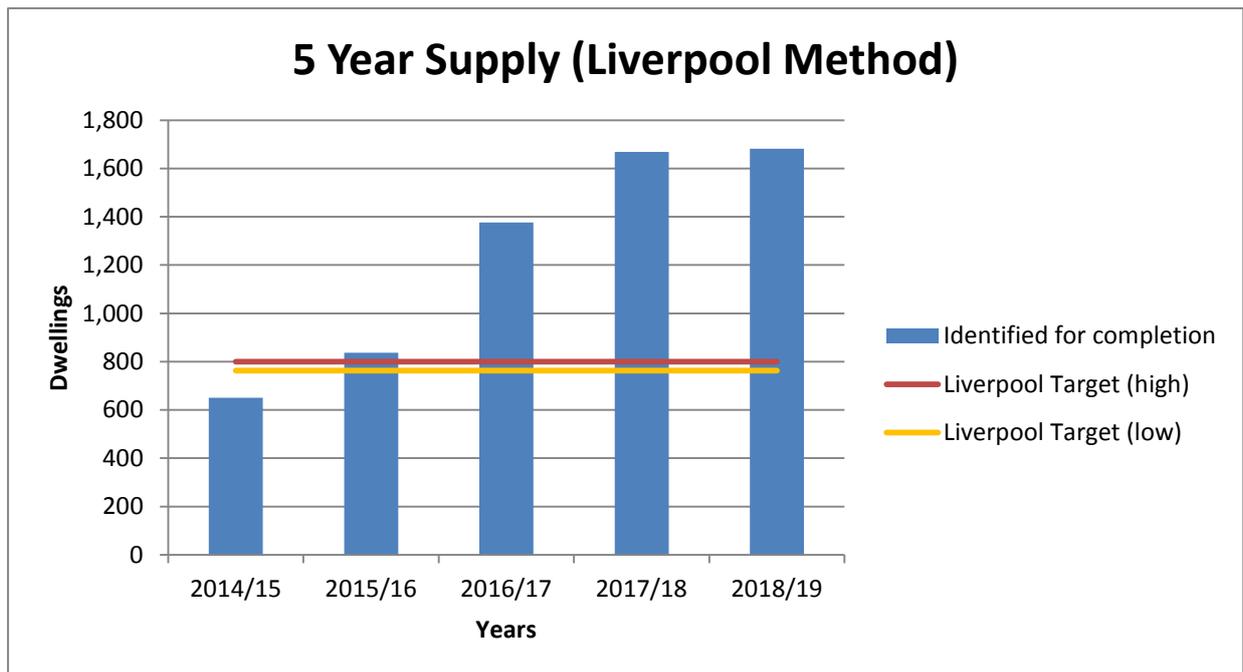
	Dwelling Numbers	% 5 Year Supply	Years Supply
Identified 5 Year Supply	6,214		
Liverpool with 5% Buffer (high)	4,000	155%	7.76
Liverpool with 5% Buffer (low)	3,816	163%	8.14
Sedgefield with 5% Buffer (high)	4,385	142%	7.09
Sedgefield with 5% Buffer (low)	4,164	149%	7.46
Identified 5 Year Supply -10%	5,593		
Liverpool with 5% Buffer (high)	4,000	140%	7.00
Liverpool with 5% Buffer (low)	3,816	147%	7.33
Sedgefield with 5% Buffer (high)	4,385	128%	6.38
Sedgefield with 5% Buffer (low)	4,164	134%	6.72
Identified 5 Year Supply -20%	4,971		
Liverpool with 5% Buffer (high)	4,000	124%	6.20
Liverpool with 5% Buffer (low)	3,816	130%	6.51
Sedgefield with 5% Buffer (high)	4,385	113%	5.67
Sedgefield with 5% Buffer (low)	4,164	119%	5.97

3.15 The following graphs (6, 7, 8 & 9), represent the 5 year housing supply position. Graphs 6 & 7 shows dwelling numbers identified for completion for each year over the next 5 and target lines for the Liverpool (high & low) and Sedgefield Method (high & low) of the calculation with a 5% buffer. Graphs 8 & 9 display the data cumulatively and a line for a 10% and 20% reduction in anticipated dwelling completion numbers,

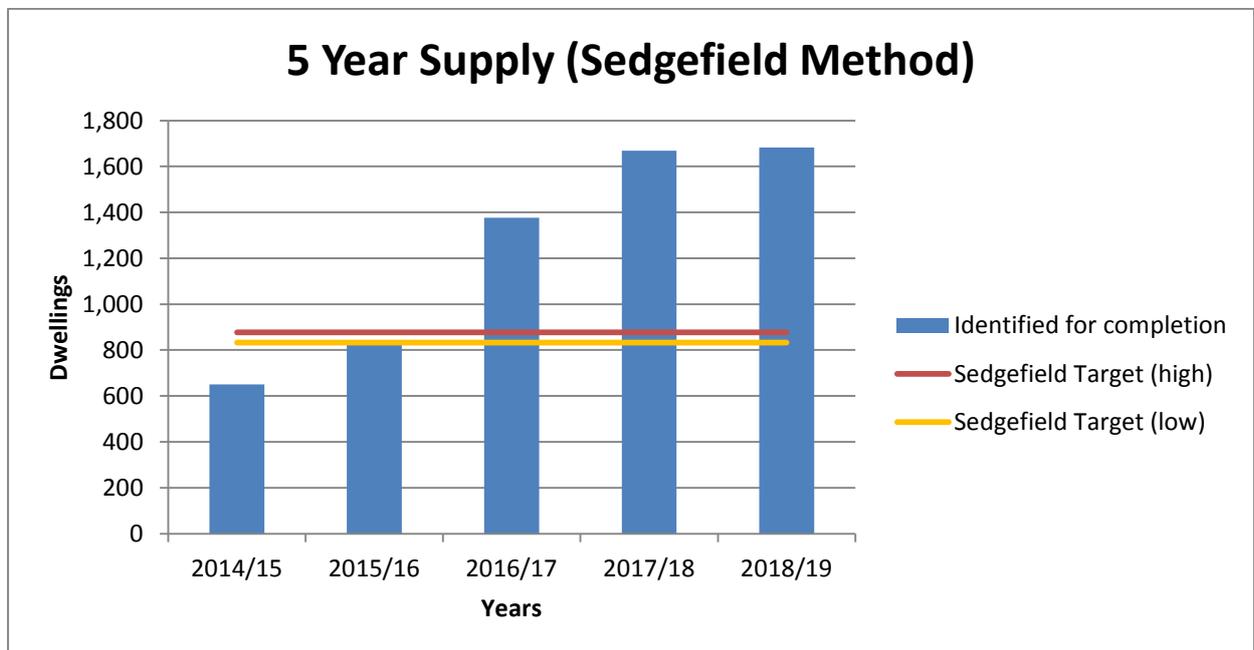
this is shown in order to take into account constraints and circumstances not known at this time that could potentially delay site delivery and therefore dwelling completion numbers.

- 3.16 A 5% buffer has been applied in line with the NPPF and is considered the appropriate buffer to apply as the Council does not have a record of persistently under delivery.
- 3.17 The NPPF provides no guidance on what is meant by persistent under delivery. The NPPG at para. 035 provides some clarification. It states "*The factors behind persistent under delivery may vary from place to place and, therefore, there can be no universally applicable test or definition of the term...*" and "*The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle...*".
- 3.18 The Council's completion numbers per year illustrate this point as the 'peaks' represent the 'boom' years and the 'troughs' represent the recession followed by completions representing the economic recovery, factors beyond the Council's control, see Graph 1. To take this longer term view and account for the 'peaks' and troughs' of the housing market the completion numbers and target number (660) has been looked at cumulatively, see Graph 10. This illustrates that the Council's completion numbers only dip below the target line for 4 of the past 13 years, these 4 years are split between the first two years (2001/02 & 2002/03) and the last two years (2012/2013 & 2013/14). This approach has been taken as housing delivery in reality is usually delivered in blocks and has little regard for mathematical target lines, delivery doesn't halt if the dwelling completions for that year hit a certain 'target' number.
- 3.19 Graph 11 shows the Council's delivery cumulatively in terms of percentage delivery of the target. The graph demonstrates that the delivery has only fallen below the 100% line in the past two years (excluding the start of the plan period); in percentage terms at 2012/13 delivery was at 96.2%, only 3.8% below. At 2013/14 delivery was at 94.3%, only 5.7% below. This does not indicate persistent under-delivery; the previous 9 years are all above 100% of the delivery target, hence the 5% buffer is appropriate

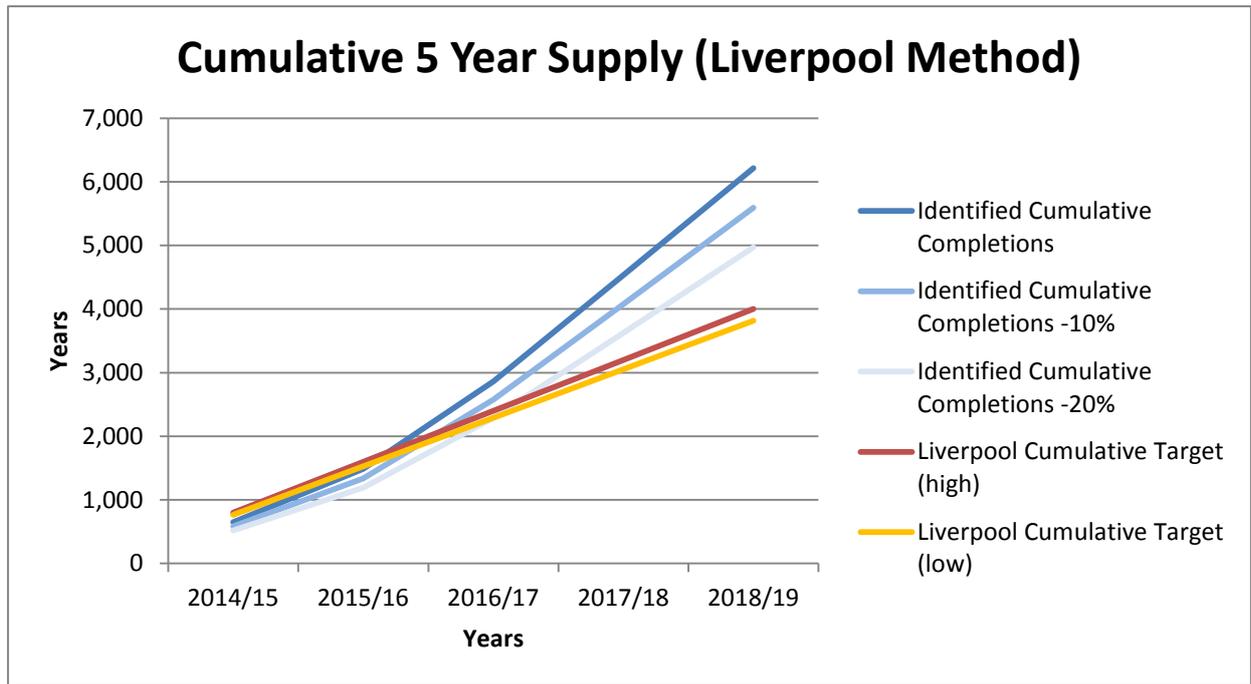
Graph 6. 5 Year Supply (Liverpool Method with a 5% Buffer)



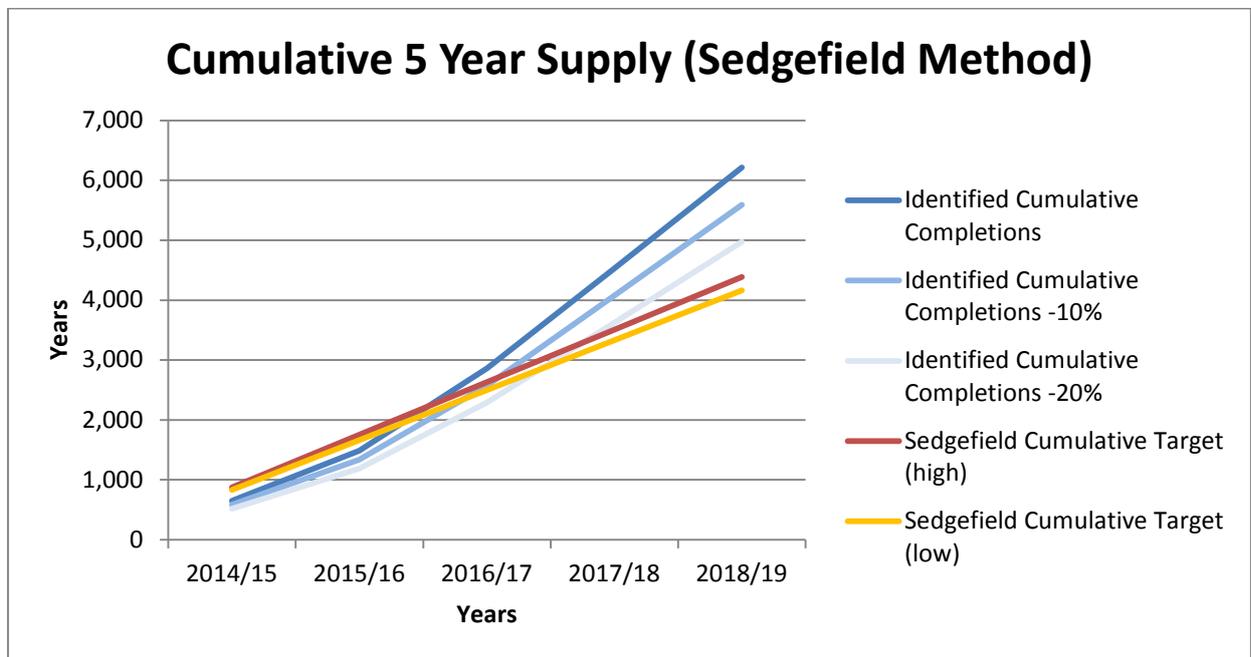
Graph 7. 5 Year Supply (Sedgefield Method with a 5% Buffer)



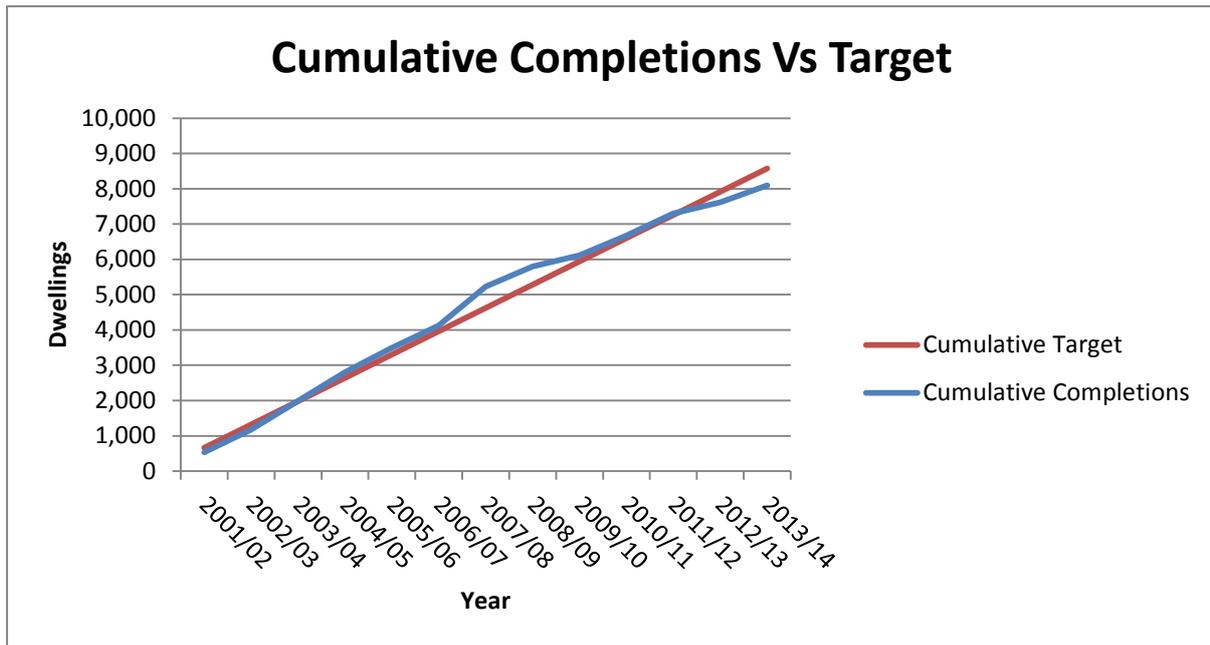
Graph 8. Cumulative 5 Year Supply (Liverpool Method with a 5% Buffer)



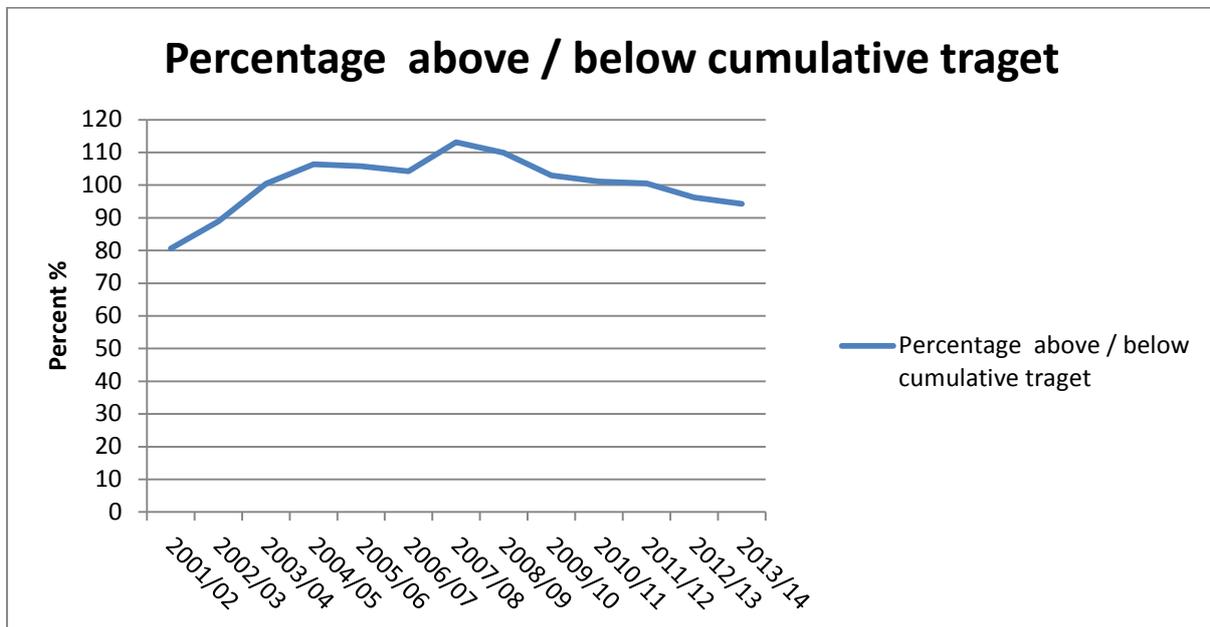
Graph 9. Cumulative 5 Year Supply (Sedgefield Method with a 5% Buffer)



Graph 10. Cumulative Completions Vs Target



Graph 11. Percentage Above / Below Cumulative Target



Economic / Employment Land Study

- 3.20 The NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use which is most appropriate. This assessment forms a key component of the evidence base to underpin policies in development plans for housing and economic development, including supporting the delivery of land to meet identified need for these uses.
- 3.21 The CS indicates the distribution of employment development across the Borough and the SADMP gives effect to and complements this, as it allocates employment /economic land uses and it includes development management policies which apply across the Borough.
- 3.22 New employment allocations are needed to provide job opportunities for residents in the Borough to support the growth aspirations for the area. To achieve this objective the CS and SADMP together aim to provide a sufficient and flexible supply of employment land during the plan period (Policy CS10 The Economy). The distribution of employment land follows that of the housing, the Settlement Hierarchy.
- 3.23 King's Lynn is the Key Centre for Development and Change and therefore is the focus for employment growth. However to support local economies it is important to look to employment development in other towns and more sustainable villages where appropriate. This pattern of growth reflects that outlined by the 2007 Employment Land Review. This review's forecast for employment land is between -16.3 ha and up to 19.4 ha. However there is a need to provide a range of sites (type, size, quality and location) to provide choice and variety across the Borough. Therefore the total land allocated will exceed the amount forecasted. Policy CS10 The Economy sets out the following employment land distribution targets:

Table 11: Required Employment Land

Area	Approx. Total land
King's Lynn	50 ha
Downham Market	15 ha
Hunstanton	1 ha
Total	66 ha

- 3.24 The role of this HELAA is to identify employment land that meets the above targets and potentially exceeds them as this HELAA time period is greater than that of the

current plan period. It may also identify land within the more sustainable villages for potential employment use.

3.25 This assessment considers sites that are capable of delivering a minimum of 0.25 ha of employment development. Whilst there is no formal requirement for an annual update of employment site allocations, they will be reviewed regularly through the Monitoring Report and HELAA updates.

3.26 The employment sites are displayed within the same assessment tables as the housing sites (part 2 of the assessment). An indicative trajectory table and mapping of the sites are displayed as part 3 and 4 respectively. The trajectory identifies a total employment land supply of approximately 131.89 ha, with 56.32 available within existing employment allocations. The remaining 75.66 ha of employment land identified arises from the HELAA sites with 68.75 ha put forward for employment allocation within the SADMP Pre-Submission document. The table below demonstrates the distribution and the anticipated phasing of the identified employment land.

Table 12: Employment Land Distribution and Phasing

Area	0 – 5 Years (ha)	6 – 10 Years (ha)	11 – 15 Years (ha)	Total Land Identified (ha)
King's Lynn	38.5	12.53	26.1	77.13
Downham Market	15.6	10.5	16.41	42.51
Hunstanton	1			1
West Lynn	3			3
West Winch			1	1
Walsoken			4.5	4.5
Snettisham			2	2
Burnham Market	0.25			0.25
Total	58.35	23.03	50.01	131.89

Risk Assessment

3.27 The main risks to delivery of housing development within the 2014-2029 time period are the potential for significant change to the planning system or a failure to adopt key sites identified for allocation within the SADMP. Annually updating the HELAA will enable these risk factors to be reviewed each year and figures will be adjusted accordingly in light of the situation at the time.

3.28 Delay in adopting the SADMP

The anticipated adoption of the SADMP is 2015. If adoption was delayed for any reason, this could potentially delay the predicted delivery of houses on any site which does not conform to current planning policy (not already within the planning process), significantly affecting the delivery of sites.

3.29 Delay in the development/- completions of Identified Sites

The anticipated development and therefore completion of an identified site potentially could be delayed by a constraint that is not known at this point in time, such as the discovery of a protected species or need for further flood mitigation measures. Annual updating of the HELAA will assist in monitoring this situation. This could most notably have an effect upon the 5 year land supply, in order to take this into account a supply rate has been calculated for an overall 10% and 20% reduction in the identified supply.

3.30 Significant change to the planning system

This HELAA has been produced in accordance with the current NPPF and PPG. Subsequent revisions of the HELAA will take into account any amended or newly published policy and guidance and therefore may differ from this version.

3.31 Instability in the economy

Whilst an attempt has been made to tailor the assessment to current economic conditions for sites predicted to be developed in the first 5 years, market growth could be slower or quicker than expected. Inaccurate predictions of delivery are even more likely in the timeframes 6-10 and 11-15 years as it is difficult to predict how the market will grow, despite available information and the use of forecasting models. However, by updating the HELAA annually, delivery timescales can be revised according to

changes in the market. It is only possible to use the best information available at the time.

Conclusion

- 3.32 The HELAA has been developed alongside the SADMP Pre-Submission document in order to determine the potential housing supply from identifiable land within the Borough of King’s Lynn and West Norfolk over the next 15 years (2014 -2029). This time frame also covers the remaining 12 years of the current plan period (2014 – 2026).
- 3.33 The HELAA looked at a variety of sources of potential housing supply including those utilised in previous versions of the SHLAA, as discussed in the main document - (Site Identification for Potential).
- 3.34 Those sites and ones that have been put forward for consideration within the SADMP process were subject to a detailed assessment to determine their potential, suitability and availability to be developed for housing land. Estimated housing capacities and delivery timescales were provided for those sites which were identified as having potential to be developed for housing land. This data was presented as site assessment tables and mapping.
- 3.35 Sites contained within the assessment tables that were shown to have potential for housing land delivery were combined with the sources of sites listed in the main report (Indicative 15 Year Housing Trajectory) to compile a 15 year trajectory for the Borough.
- 3.36 The Trajectory demonstrates that the HELAA has identified that a total of 7,390 dwellings could potentially be delivered on identified HELAA sites within the remainder of the plan period to 2026 and 10,272 to 2029. With 17,548 dwellings identified from all housing sources. This meets the HELAA target of 10,200 – 10,650 dwellings to 2029. The phasing of this is shown below:

Site Phasing	HELAA Identified Sites	All Identified Sites
0 – 5 Years	2,388 dwellings	6,214 dwellings
6 – 10 Years	4,033 dwellings	6,331 dwellings
11 – 15 Years	3,851 dwellings	5,003 dwellings
Total	10,272 dwellings	17,548 dwellings

- 3.37 This can be expressed as 6,214 deliverable dwellings and 11,334 developable dwellings that have been identified overall. Of this the HELAA sites make up 2,388 deliverable dwellings and 7,884 developable dwellings. In terms of site numbers the HELAA has identified 147 sites that are deliverable and 204 sites that are developable.
- 3.38 This data was used to provide a 5 year land supply position through both the Liverpool and Sedgefield methods of calculation, resulting in a 5 year land supply of 7.76 years – 8.14 years using the Liverpool Method with a 5% buffer, depending upon the inclusion of UPC and 7.09 years – 7.46 using the Sedgefield Method with a 5% buffer, depending upon the inclusion of UPC. -It was also utilised to provide an update with regard to the CS housing target, this showed that the target to deliver 16,500 dwellings by 2026 is exceeded with 8,093 dwellings already completed and 10,345 dwellings identified for completion, providing a total of 18,438 dwellings within this time frame.
- 3.39 Running alongside the housing assessment was an economic/employment land assessment; this was also presented in tabular and map form and then combined with existing employment land allocations/sites data to produce a 15 year trajectory. This demonstrated a supply of 131.89 ha, of which 68.75 ha arose from sites put forward for consideration within previous SHLAAs and the SADMP process. In total this exceeded the target.
- 3.40 Four main risk factors have been identified which could negatively impact upon the predicted rate of housing and economic land delivery in this assessment:
- Delay in adopting the SADMP
 - Delay in the development/ -completion of Identified Sites
 - Significant change to the planning system
 - Instability in the economy
- 3.41 No one factor has been identified that would inhibit housing and economic land delivery altogether. This assessment will be updated annually and this means that delivery timescales can be revised according to current conditions and knowledge.

Appendix 1 Site Survey Form

Site Survey Pro-forma

Date of Survey	
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Site Information	
Site Id	
Parish/Ward	
Photo Numbers	

Address/Site Description

Is the site size, boundaries and location provided accurate?

Current Land Use (i.e. residential, agricultural, retail etc.)

Policies
Is the site on brown-field or green-field land?
Landform & Heritage (Inc. Physical Constraints)
Describe the topography - Is the height and shape of the land suitable to develop upon? (e.g. flat, sloping, undulating, irregular)

Would development on the site have an impact on the townscape character? (historic or otherwise) Could this be mitigated?
Would development on the site result in a loss of significant public viewpoints?
Infrastructure
Could development on the site impact (neg or pos) upon the local highways network? (traffic, access, safety etc.)
Are there any sustainable transport links (footpaths, cycle links etc.)? Is there potential for improving other sustainable transport links? (Walking, cycling etc.)
Quality of Life
Describe the neighbouring/surrounding uses.
Will development have an impact (neg or pos) on amenity? (e.g. overlooking, noise and light pollution).
Is the site in a location which has easy access to services (e.g. Bus routes, shops, open space etc.)

Would development result in a loss of accessible open space? (e.g. playing fields, play areas, amenity green space, allotments)	
Would development on the site impact (neg or pos) upon a public right of way or bridleway?	
Economy	
Would development on the site impact (neg or pos) upon the viability and vitality of the town/village centre?	
Would development on the site result in a loss of employment land?	
Will the development impact (neg or pos) upon the viability of agricultural activity?	
Issues to Check	
Are there any community facilities? e.g. meeting hall on the site?	
Is there any historic structures/archaeological/geological features?	
Are there any mature trees on site or close to the boundaries?	
Are there any visible contamination issues? (Has the site been checked by EH?)	

Are there any streams, ditches or dykes?	
Are there any overhead cables/pylons	
Obvious low/wet ground?	
Any signs of access across the site/informal recreational use?	
Any obvious signs of wildlife?	
Would development have an impact (neg or pos) on the landscape character (Check against landscape character assessment)?	
Any Other Issues/Initial Comments on Suitability	
Where Relevant, notes on development progress	