

Borough Council of King's and West Norfolk Local Plan Review (2016 – 2036):

Housing and Economic Land Availability Assessment (HELAA) Update

June 2020

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1. Introduction

1.1 The Borough Council of King's Lynn and West Norfolk (BCKLWN) Housing and Economic Land Availability Assessment (HELAA) is a technical study which has been developed to determine the potential housing and economic land supply within the Borough over a 20-year period, from 2016 through to 2036. This time frame accords with the emerging Local Plan review. The HELAA is intended to inform the preparation of this.

1.2 The first HELAA in support of the Local Plan review was prepared in 2018/2019 and was published alongside the draft Local Plan review for consultation in early/mid-2019. This can be viewed in full via the link below:

https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/379/housing_and_economic_land_availability_assessment_helaa

1.3 The first HELAA covered the planning policy context and an overview of the HELAA methodology. The HELAA methodology can also be viewed in full via the above link.

1.4 It is important to note that the HELAA does not represent policy and will not ultimately determine if a site should be allocated within the Local Plan review or indeed should be granted planning permission. This is the role of the Local Plan and the development management process. Similarly, the non-inclusion of a site does not preclude future development, providing proposals accord with planning policy which is in place at the time that a site comes forward (unless material considerations indicate otherwise).

1.5 Assessments are based upon the information available at the time. This includes that which has been submitted by the land owner/promotor/agent in support of a site as part of their overall submissions to the 2016 'Call for Sites and Policy Suggestions' consultation and the draft Local Plan review consultation 2019, information provided by those consultees involved, desktop and site visit information, and any information from previous planning applications on the same site for a similar proposal.

1.6 The overall aim of the HELAA is to assess the potential land supply within the Borough and determine if the Borough Council is likely to be able to meet the identified need for housing and for economic growth. It will also support discussions with other authorities through the duty to cooperate if the Borough Council needs assistance in delivering its development need.

1.7 This HELAA Update takes the earlier HELAA and builds upon this by factoring in the sites which have been submitted for consideration in the Local Plan review, at the 2019 draft consultation stage via the online site submission forms. The update does not repeat much of the content of the first HELAA and therefore this should also be consulted.

1.8 The HELAA update has been prepared based upon sites from the following sources:

- Sites with planning permission for housing or economic uses
- Sites which are allocated within the existing Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016)
- Sites submitted through the Call for Sites and Policy Suggestions consultation
- Sites submitted through the draft Local Plan review consultation
- Consideration of the contribution to housing supply from windfall sites going forward
- Made Neighbourhood Plans

1.9 The earlier HELAA and the HELAA Methodology explains in great detail how sites were assessed and the HELAA update follows this to ensure a consistent approach.

2. Local Housing Need

2.1 As mentioned, the HELAA's purpose is to consider if the identified housing need for the Borough can be met. This section establishes what the current (April 2020) Local Housing Need for the BC is.

2.2 The National Planning Policy Framework (NPPF) makes it clear that the Local Housing Need (LHN) for the purpose of plan-making if the Local Plan was adopted over 5 years ago, should be calculated using the standard methodology. This was introduced by the revised NPPF and is set out within the PPG Housing need assessment chapter. This is further reaffirmed by the PPG in the Housing and economic land availability assessment chapter. The current (April 2020) LHN calculation for the BCKLWN is set out below:

Local Housing Need (LHN)

Step 1: Setting the baseline

2014 – Based Household Projections in England. Table 406:

2020	2030	Growth
66,831	71,279	4,448

$$4,448 / 10 = \underline{444.8}$$

Step 2: An adjustment to take account of affordability

2019 Median Work Based Affordability Ratio (Published April 2020). Table 5c:

$$2019 = 7.37$$

Adjustment Factor

$$= (\text{local affordability ratio} - 4 / 4) \times 0.25$$

$$= (7.37 - 4 / 4) \times 0.25 = 0.210625$$

Minimum annual local housing need figure

$$= (1 + \text{adjustment factor}) \times \text{Projected household growth}$$

$$= (1 + 0.210625) \times 444.8$$

$$= (538.486) \underline{539}$$

Step 3: Capping the level of any increase

2.3 The local authority adopted a local plan more than 5 years ago and has not reviewed the housing requirement since then. Although we have through the endorsement of FOAN studies in this context the last plan adopted which assessed and set housing numbers was the Core Strategy adopted in 2011.

- The average annual housing requirement figure in the existing relevant policies is 660 a year
- Average annual household growth over 10 years is 444 (as per step 1)
- The minimum annual local housing need figure is 539 (as per step 2)
- The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:
- $\text{Cap} = 660 + (40\% \times 660) = 660 + 264 = 924$

2.4 The capped figure is greater than minimum annual housing need figure and therefore the minimum figure for this local authority is **539**

Local Housing Need (LHN) = 539

2.5 Following the standard method, as above, the current LHN figure for the Borough of King's Lynn and West Norfolk is 539 dwellings per year. Note this uses data as advocated by the standard methodology. The latest currently comprises the 2014 – Based Household Projections in England (2016) and the 2019 Median Work Based Affordability Ratio (April 2020) both published by the Office for National Statistics (ONS).

3. Future Windfall Allowance

- 3.1 Windfall sites are sites which have not been specifically identified as part of the Local Plan. The term covers sites that have unexpectedly become available. They can be both small (1 - 9 dwellings) and large sites (10 + dwellings).
- 3.2 Windfall sites have provided an important source of development across the Borough in the past and are expected to continue to contribute to the supply in the future.
- 3.3 Indeed, the Local Plan states that not all growth will be delivered through the site allocations, whilst part will be made up on sites with existing planning permissions, other sites which currently do not have planning permission will come forward, these unallocated sites are known as windfall sites.
- 3.4 Allowances are made for windfall from large and small sites within the BCKLWN five-year housing land supply calculation. This is based on 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.
- 3.5 To avoid double counting of windfalls the Borough Council suggests that it would be reasonable for the windfall allowance only to be applied from year 4 onwards. This means that in the first 5-year period, the windfall allowance is not considered within years 1, 2 or 3, but is for years 4 and 5. The rate is also discounted by 25% recognising that land is a finite resource.
- 3.6 It is also important to understand that with the exception of King's Lynn Town all of the Local Plan allocations are made outside of the current development boundaries, therefore still enabling land within the development boundaries to come forward for development as windfall. King's Lynn is by far the largest urban area within the Borough, it is therefore considered that there is still sufficient area within the existing development boundary of King's Lynn which could be developed or redeveloped thus enabling windfall sites to occur at this location as well.
- 3.7 The windfall allowance, based upon the 2019/20 housing trajectory, is 311 dwelling per year. This is broken down to 128 dwelling per year on large sites and 183 dwellings per year on small sites. (note this includes a 25% discount recognising that land is a finite resource).
- 3.8 The SADMP, section D page 75, contains a windfall allowance of 2,886 dwellings over the period (2013 -2026). Removing the first 3 years as proposed, in the above suggestion, would result in an over allowance within the Plan of 288 dwellings per year. This broadly aligns with the above calculation and given that 2019/20 housing trajectory uses the latest data and is the latest appraisal of the windfall situation, it is this which is proposed to be carried forward and used within the HELAA.

3.9 The vast majority of sites which have been proposed for consideration within the Local Plan review process (through the Call for sites and Policy Suggestions consultation) are located outside of existing settlement boundaries and would, normally, require allocation within the Local Plan or a Neighbourhood Plan in order to come forward therefore they would not constitute a windfall site. Those sites which have been proposed that have planning permission have been discounted from the dwelling contribution assessment on the individual site appraisal forms as they will be included within the housing trajectory (as site with planning permission) and therefore any land supply calculations. This should ensure that sites and their dwelling capacity are not double counted.

4. HELAA Update Results

- 4.1 The first HELAA initially assessed a total of 540 sites which were submitted for consideration through the call for sites process. 210 of these sites did not pass stage 1 of the assessment. 330 sites were assessed in stage 2 in terms of each site's potential housing capacity and delivery. Of these 181 sites were considered to be unsuitable due to identified constraints / barriers to delivery, which based upon the available information was difficult to suggest how these could be overcome.
- 4.2 This meant that 149 sites were considered to potentially contribute towards the dwelling capacity of the Borough. It was estimated that these 149 sites could potentially provide a total dwelling capacity of 7,938.
- 4.3 Through the draft Local Plan review consultation, a further 100 sites were submitted for consideration. Of these 30 of sites did not progress to stage 2 of the assessment. This meant that 70 additional sites were assessed in stage 2. Of the 70 sites, 19 were considered to potentially contribute towards the dwelling's capacity of the Borough. It is estimated that these 19 sites could potentially provide a total dwelling capacity of 824.
- 4.4 In total from the two consultations 640 sites have been submitted for consideration in the Local Plan review process and of these 168 sites were assessed in stage 2 and it has been estimated that these could potentially contribute 8,762 dwellings to the total dwelling capacity of the Borough.
- 4.5 In addition to these 'HELAA' sites, sites with planning permission and sites which are allocated within the Local Plan (some of which benefit from planning permission) contribute to the existing land supply. As discussed in the previous section, windfall sites although not given a site number are anticipated to contribute towards the supply of housing within the Borough going forward.
- 4.6 The West Winch Growth Area is a strategic allocation which forms part of the BCKLWN Local Plan. This is allocated for at least 1,600 dwellings in the current plan period to 2026. However, this has been revised as part of the Local Plan review to 2,500 dwellings by 2036 (end of the Local Plan review period) and in the region of 4,000 dwellings in the fullness of time.
- 4.7 Local Plan allocations are all expressed as 'at least x' number of dwellings. This offers a degree of flexibility in that sites have the potential to deliver a higher number than the minimum number stated within the relevant policy (subject to consistency with local and national policies). The numbers used within this HELAA for the allocations are those taken from the 2019/20 housing trajectory.

4.8 The results table below provide a numerical breakdown of, were possible, the sites and the dwelling numbers which have been identified and illustrates which time period that they are likely to come forward within. Please note that larger sites will contribute housing supply in multiple time bands.

Results Table

	0 - 5 years		5 - 10 years		10 - 15 years		15 - 20 years	
Housing Supply Source	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings
2019 HELAA Sites	17	619	2	205				
2016 HELAA Sites	133	5,207	18	1,630	10	864	1	237
Extant consents on unallocated sites (10+)	32	817	13	434				
Extant unallocated sites (5-9) units	64	293	3	20				
Extant consents for small sites (1-4 units)	772	1,165						
SADMP 2016 Allocations	62	1,765	23	3,134	8	2,140	3	1,730
Additional Accelerated Construction Sites	2	81						

Neighbourhood Plan Allocations			2	79			
Windfall Allowance		622		1,555		1,555	1,555
Total Identified Housing Supply		10,569		7,057		4,559	3,522

4.9 The table below provides a condensed summary of the results table in terms of dwellings, the time period and housing source. In total 23,809 dwellings have been identified over a twenty-year period.

Summary Results Table

	0 - 5	5 - 10	10 - 15	15 - 20	Total
Planning Permission	2,275	454	0	0	2,729
SADMP Allocations	1,765	3,134	2,325	2,140	9,364
NP Allocations	0	79	0	0	79
ACP Sites	81	0	0	0	81
2019 HELAA Sites	619	205	0	0	824
2016 HELAA Sites	5,207	1,630	864	237	7,938
Windfall	622	1,555	1,555	1,555	5,287
Total	10,569	7,057	4,744	3,932	26,302

4.10 The results have been plotted, below, to provide an indicative housing trajectory:

4.11 The table below illustrates the geographic distribution of the sites and dwellings assessed through the HELAA process to date and considered potentially suitable, which were submitted via the 2016 Call for Sites and Policy Suggestions consultation and the 2019 draft Local Plan review consultation:

Geographic Distribution of HELAA Dwellings & Sites

Settlement	2016 HELAA		2019 HELAA		Total	
	Dwellings	Sites	Dwellings	Sites	Dwellings	Sites
Brancaster	30	1			30	1
Burnham Market	88	4			88	4
Castle Acre	28	2			28	2
Clenchwarton	450	7	18	1	468	8
Denver	132	1	132	1	264	2
Dersingham	37	1			37	1
Docking	265	5			265	5
Downham Market	2,448	7	370	1	2818	8
East Rudham	10	1			10	1
East Winch	23	3	11	2	34	5
Emneth	399	10			399	10
Fincham	60	2			60	2
Gayton	51	3			51	3
Great Massingham	76	3	15	1	91	4
Grimston	93	4			93	4
Harpley	20	2			20	2
Heacham	645	12	13	2	658	14
Hilgay	65	3			65	3
Hunstanton	13	1			13	1
Ingoldisthorpe	106	4			106	4
King's Lynn	60	1			60	1
Marham	21	1	35	1	56	2

Marshland St James	162	6			162	6
Middleton	129	3			129	3
Old Hunstanton	56	1			56	1
Outwell	58	3			58	3
Pott Row	31	2			31	2
Runcton Holme	179	5			179	5
Sedgeford	40	4			40	4
Snettisham	98	3			98	3
Southery	79	4			79	4
Stoke Ferry	210	7			210	7
Syderstone	133	3			133	3
Terrington St Clement	144	1	73	1	217	2
Terrington St John	88	3	78	2	166	5
Thornham	315	4			315	4
Tinley St Lawrence	16	2			16	2
Upwell	189	7	35	4	224	11
Walpole Highway	173	4	34	1	207	5
Walsoken	494	2			494	2
Watlington	191	5	5	1	196	6
West Lynn	33	2			33	2
West Walton			5	1	5	1
Total	7,938	149	824	19	8762	168

5. Land for Economic Development

5.1 The earlier HELAA contained detail sections on economic land and retail, the majority of this remains valid and therefore there is little merit in simple repeating this. What follows is an update of the summary of the overall economic land picture taking into account those sites which were proposed through the draft Local Plan review consultation 2019. (see over the page for a table of the sites).

5.2 Overall, the total amount of employment land identified through the HELAA as available is 121.1 ha. The table below provides a breakdown of this:

Site Source	Area (ha)	Developed (ha)	Available (ha)
Allocations	69	1.8	67.2
Others	355.7	313.44	42.26
HELAA 2016	8.15	0	8.15
HELAA 2019	3.55	0	3.55
Total	436.4	315.24	121.1

5.3 The employment land which has been identified in the table above as currently available does not factor in the potential for employment land which is classed as already developed to be re-developed. Based on an uptake of 17 ha over a 5-year period, as established in the earlier HELAA, this up this could mean a potential for in excess of 35 years' worth of employment land (note this doesn't include the port and associated industrial area).

HELAA Ref	Site Ref	Settlement	Address	Proposed Use	Size (Ha)	HELAA Constraints/ Impacts	Assessed as Housing	At Employment Growth Location	Already Allocated	Potentially Suitable for Employment Allocation	Notes
2H036	29-04-20192654	King's Lynn (West Lynn)	West Lynn MF Transmitting Station Clenchwarton Road	Employment Land	1.97	None identified for employment uses	No	Yes	No	Yes	Could be suitable for employment use
2H038	11-04-20191015	King's Lynn	Land off Estuary Road, North Lynn	The site has been proposed for B1, B2 and B8 employment uses, as an extension to Riverside Industrial Estate	2.8	None identified for employment uses	No	Yes	No	Yes	Already assessed as H525 25-11-20165672
2H039	26-04-20199830	King's Lynn (West Lynn)	The Oaks, Clenchwarton Road	Employment Land / Housing	1.58	None identified for employment uses	Yes – Not Suitable	Yes	No	Yes	Could be suitable for employment use but not housing

6. HELAA Update Conclusions

- 6.1 The HELAA update has identified that there is a potential land supply across the Borough which could deliver 26,302 dwellings over the next 20-year. 7,938 dwellings are from the 2016 HELAA sites i.e. those submitted for consideration in the Local Plan review Call for Sites and Policy Suggestion Consultation, and 824 dwellings are from the 2019 HELAA sites i.e. those submitted as part of the draft Local Plan review consultation. The remaining dwellings have been identified through the 2019/20 Housing Trajectory.
- 6.2 The current Local Housing Need (LHN) as illustrated earlier in this paper is 539 new homes per year. This over a 20-year period is a requirement for 10,780 new homes. The HELAA Update demonstrates that there this could be more than meet with 26,302 dwellings identified.

HELAA Update Summary Results Table

	0 - 5	5 - 10	10 - 15	15 - 20	Total
Planning Permission	2,275	454	0	0	2,729
SADMP Allocations	1,765	3,134	2,325	2,140	9,364
NP Allocations	0	79	0	0	79
ACP Sites	81	0	0	0	81
2019 HELAA Sites	619	205	0	0	824
2016 HELAA Sites	5,207	1,630	864	237	7,938
Windfall	622	1,555	1,555	1,555	5,287
Total	10,569	7,057	4,744	3,932	26,302

7. Consideration of Local Plan review (2016 – 2036) Latest Housing Numbers

7.1 This section considers the impact of the latest housing number upon the Local Plan review. As discussed earlier the Local Housing Need is currently 539 new homes per year, which equates to 10,780 new homes of the twenty-year local plan review period. The table below is based upon the 2019/20 Housing Trajectory. For further information with regards to the full 2019/20 Housing Trajectory Schedule, windfall allowance calculation, 5-year housing land supply position and housing delivery please see the Borough Council's Housing Delivery Action Plan webpage: https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan

Local Plan review (2016-2036) – Updated Housing Numbers Calculation - June 2020 -Based upon the 2019/20 Housing Trajectory

Line	Item	Value	Notes
1	<ul style="list-style-type: none"> The BCKLWN current Local Housing Need (LHN) figure is 539 new dwellings per year 	539	<ul style="list-style-type: none"> Government provided calculation/figure, against which our Local Plan, Housing Delivery Test and Five-Year Land Supply is measured. (NB this is subject to change).
2	<ul style="list-style-type: none"> Over the 20-year plan period (2016 -2036) (539 x 20) this results in an overall need for 10,780 new homes 	539 x 20 = 10, 780	<ul style="list-style-type: none"> NEED to plan to achieve.
3	<ul style="list-style-type: none"> 2019/20 Housing Trajectory Schedule shows that there are 10,144 dwellings committed i.e. have a permission (Full, Outline, Allocation or ACP funding) 	10,144	
4	<ul style="list-style-type: none"> Since 2016/17 (the start of the plan period) 1,802 dwellings have completed 	1,802	
5	<ul style="list-style-type: none"> Completions & Commitments total: (10,144 +1,802) = 11,946 	11,946	<ul style="list-style-type: none"> This takes account of sites proposed for de-allocation through the Local Plan review
6	<ul style="list-style-type: none"> Minus Boal Quay and associated sites? Allocated for at least 450. The trajectory schedule takes a conservative approach and only considers 150 dwellings 		<ul style="list-style-type: none"> The BC is considering mixed use options on these sites, hence a reduction is already factored in.

7	<ul style="list-style-type: none"> • Need (10,780) – Supply (11,946) = + 1,166 	$10,780 - 11,946 = + 1,166$	<ul style="list-style-type: none"> • This is the number of dwellings required to meet the min. required LHN • <u>So potentially no new / further housing allocations required</u>
8	<ul style="list-style-type: none"> • Emerging Local Plan review draft allocations 2020: Terrington St Clement (76) & Marham (35) = 111 $11,946 + 111 = 12,057$ 	$10,780 - 12,057 = + 1,277$	
9	<ul style="list-style-type: none"> • The latest (2019/20 HT) shows the windfall allowance to be 311 dwellings per year. (Note this includes a 25% discount) 		<ul style="list-style-type: none"> • This has been calculated in accordance with the NPPF/PPG and is justified based upon historic trends since 2001/2002
10	<ul style="list-style-type: none"> • Windfall allowance of 13 years' worth: $13 \times 311 = 4,043$ 	$13 \times 311 = 4,043$	<ul style="list-style-type: none"> • 16 years of the LPr period to run. However, we have to allow a period of 3 years with no allowance giving sufficient time for such sites to come forward, so 13 years of the windfall allowance is calculated.
11	<ul style="list-style-type: none"> • Windfall should be seen as flexibility on top of what already has completed and is committed. 	$12,057 + 4,043 = 16,100$ $10,780 - 16,100 = + 5,320$	<ul style="list-style-type: none"> • It is important that the annual LHN figure is not inflated to be expressed as a TARGET, since The Borough Council would then be measured against this larger figure, i.e. $539+311=850$ p.a. • This figure would be seriously unachievable. • It should be expressed as 'Flexibility' to assure an Inspector that we have contingency if an element of 'planned' provision does not come forward as envisaged. • Although not windfall, further homes may be delivered through Neighbourhood Plans as allocations.

12	<p>Summary</p> <ul style="list-style-type: none"> • Need (539 x 20) = 10,780 • Completions & Commitments = 11,946 • + LPr Allocations (111) = 12,057 • + Windfall (4,043) • Total projected Supply = 16,100 • 10,780 – 16,100 = 5,320 	<p>Supply = 12,057 ('Planned' provision)</p> <p>Need = 10,780. Surplus on 'planned' provision = + 1,277</p> <p>-----</p> <p>Projected windfall = 4,043 ('Unplanned' potential)</p> <p>(Surplus) / 'Flexibility' (including windfall)</p> <p>= 5,320</p>
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Latest Housing Numbers Conclusions

- Government are tasking the Borough Council to meet our LHN. The calculation clearly demonstrates we would be doing this
- The 'surpluses / 'flexibility' acknowledged as a large figure. However, this would mean we are consistent with the NPPF in 'significantly boosting supply'
- There is no 'buffer' written into the Need / Supply or LHN calculation.
- We should guard against the LHN figure being increased, so that Government does not measure us against an inflated figure
- By acknowledging we have a measure of 'flexibility' to ensure that we can meet our 'planned' need we show we have a 'contingency'. This is the approach advocated by the SADMP Inspector. He saw it as very important that the Borough Council was not reliant on an overly precise calculation
- These results in flexibility in the event that planned allocations don't come forward as currently anticipated
- The planning system is very permissive in regard to windfall, historically this has made a significant contribution to completions in the borough and we are simply acknowledging that fact
- The result is potentially no need to make any further housing allocations but cement the ones we have already made in the current adopted Local plan and want to take forward
- However, it may be that some of the draft allocations proposed in the draft Local plan review for a variety of reasons we still may want to take forward. This should form part of the discussion when we go on to consider settlement and individual sites
- It would support localism through communities Neighbourhood Plans.

8. Overall HELAA Update Conclusion

- 8.1 The HELAA update has identified that there is a potential land supply across the Borough which could deliver 26,302 dwellings over the next 20 years. This is in excess of housing need requirement of 10,780 dwellings over the same time period.**
- 8.2 Of the 26,302 dwellings identified by the HELAA, 8,726 dwellings are identified from sites which have been submitted for consideration in the Local Plan review through the Call for Sites and Policy Suggestion Consultation and the draft Local Plan review Consultation.**
- 8.3 The consideration of latest housing numbers and the impact of those upon the Local Plan review results in no absolute need to make any further housing allocations in order to meet the Local Housing Need (LHN) and in fact there is also a healthy number of potential homes on top this, and even more once a justifiable future windfall allowance is factored in, which would provide a great degree of flexibility.**