

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



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

**Updated Housing Land Supply (April 2023)**

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## Introduction

1. Following the adjournment of the Local Plan Examination Hearing on the 11 January 2023 the Inspectors invited the Council to review and update the report on Housing Supply [F43b] as follows:
  - Paragraph 4 states that ‘the Council would like to fix the five-year housing land supply through the examination process with a 10% buffer applied to the overall housing requirement’. However, as agreed at the Hearing session on 10 January, the Council cannot seek to ‘fix’ the five year supply at this stage of the Examination process and, as such, reference to this should be removed from the Housing Land Supply report;
  - It may also be that the 5-year housing land supply calculation will need to be adjusted in the light of changes to the delivery status and trajectory of sites in document F34.
2. In light of the above, this paper sets out the housing supply, five-year housing land supply, an updated housing trajectory and presents evidence relating to the deliverability and developability of the supply following the updated Deliverability and Developability document (April 2023).

## 5 Year Housing Land Supply Requirement

3. The Local Housing Need (LHN) for the Borough Council of King’s Lynn and West Norfolk is 571 dwellings per year which is 10,278 dwellings over the 18-year Plan period (2021/2022 to 2038/2039). The data that supports this report relates to a base date of 1 April 2021.
4. As the LHN is 571 dwellings per annum, the Five years’ housing target is equivalent to 2,855 dwellings. This forms the starting point for the calculation of the supply requirement.
5. Paragraph 74 of the NPPF requires that “the supply of specific deliverable sites should in addition include a buffer of:
  - a) 5% to ensure choice and competition in the market for land; or
  - b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
  - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”
6. The appropriate ‘buffer’ to be applied is considered to be 5% as the Council is not seeking to ‘Fix’ the five-year supply and there has not been a significant under delivery of housing over the previous 3 years as demonstrated below:
7. The Housing Delivery Test results for the period 2020/21 shows that 96% of the required homes were delivered in the area over the previous three-year period as shown in Table 1 below.

**Table 1: Housing Delivery Test 2020/2021**

	Completions		Target		Housing Delivery Test Result
	Annual	3 year total	Annual	3 year total	
2018/19	432	1363	556	1422	96%
2019/20	591		508		
2020/21	340		358		

8. Planning Practice Guidance (PPG) (Paragraph: 011 Reference ID:2a-011) states that:

“The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately.”

9. This means that any shortfall from before the start of the plan period can be ignored for the purposes of calculating the housing requirement for a local plan and for the five-year supply.

10. Paragraph:031 (Reference ID:68-031) of the PPG states that:

‘The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case-by-case basis on appeal.’

11. However, this paragraph in the Housing Supply and Delivery PPG is concerned mainly with what should happen if actual delivery of housing falls below the rate proposed in an adopted plan. Indeed, the PPG on Housing Supply and Delivery does not provide guidance on plan-making or setting the local housing need figure. Rather, it sets out guidance to enable a local authority to calculate whether it has a five-year housing land supply and how it should measure its performance against the Housing Delivery Test.

**Table 2: Five-year housing land supply requirement**

Annual housing target	571
Five year target	2,855
5% Buffer	143
Total Five year housing requirement	2,998
Annualized Five year requirement	599.6

### 3. Sources of Housing Supply

12. Paragraph 68 of the NPPF states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability and should identify a supply of
- a. specific, deliverable sites for years one to five of the plan period (With an appropriate buffer, as set out in paragraph 74. See Glossary for definitions of deliverable and developable); and
  - b. specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
13. In order to fully understand the supply of land available for residential development, it is necessary to assess a number of different sources of supply.
14. The various sources that make up the overall supply of housing are as follows:
- Number of homes completions between April 2021 to March 2022;
  - Extant planning permissions as at 1 April 2022;
  - Proposed allocations without planning permission;
  - Proposed allocations with planning permission; and
  - Windfall sites.
15. Each source is considered separately with different tests and buffers being applied accordingly. This is addressed in each section of this report.
16. The PPG and the NPPF define what evidence can be used to demonstrate the deliverability or developability of a site. They are not considered to be exhaustive so where it is necessary the use of other evidence is justified.
17. A developable site is defined in the glossary to the NPPF as:

**Developable:** *To be considered development a site must be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged*

18. A deliverable site is defined in the glossary to the NPPF.

**Deliverable:** *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years*

19. The PPG lists the suitable evidence to demonstrate deliverability as follows:

- current planning status – for example, on larger scale sites with outline or hybrid permission how progress made towards approving reserved matters, or a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
  - firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;
  - firm progress with site assessment work; or
  - clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for largescale infrastructure funding or other similar projects.
20. The list of suitable evidence as suggested in both the PPG and the NPPF are not considered to be exhaustive so where it is necessary the use of other evidence is justified.
21. The following sections discuss the sites and evidence is provided within the appendices to this report.

## Housing Land Supply (Plan Period 2021/22 to 2038/39)

### Completions within the plan period

22. Between 1 April 2021 and 31 March 2022, 403 net additional dwellings were completed that can be counted towards the housing supply. Of the 403 dwellings completed for this period, 44 were from allocated sites.

### Extant consents

23. Unallocated sites with planning permission (Extant Consents) will deliver **2,647** homes.
24. They are all considered deliverable within the plan period and are detailed in the housing trajectory (April 2023), there is no evidence that any of the sites will not be delivered. The Council is therefore of the opinion that there is a need to apply a conservative discount to these sites to account for lapse rates in the first few years of the plan period.

### Allocations

25. Allocated sites currently with planning permission will deliver a total of **2,295** dwellings. The Council believes there to be sufficient, clear and demonstrable evidence that these sites are considered developable within the plan period.
26. Allocated sites currently without planning permission will deliver a total of **3,194** net additional dwellings. The council believes there to be sufficient, clear and demonstrable evidence that these sites are considered developable within the plan period.
27. The sites and evidence of their deliverability or developability are contained in the updated Deliverability and Developability document (April 2023) (Appendix B).

## Windfall

28. National policy specifically recognises the importance of windfall sites in delivering homes with windfall sites being defined as those which are developed but are not specifically identified in the development plan.
29. Allowances for windfall sites can be included in the five-year supply as set out in paragraph 3-24 of the PPG. Any assessment of windfall does however need to be based on compelling evidence in accordance with NPPF paragraph 70. “Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.
30. In response to Matter: Housing, Issue 6, Question 332 the council shows how the figure of 299 has been derived.
31. Windfall within the first 4 years of the plan period has been removed to avoid for double counting. In the early part of the plan period, the likelihood is that most windfall completions would be delivered as a result of the implementation of extant consents.
32. In addition to this, a discount has been applied to the windfall allowance to account for any anomalies over the plan period.

## Overall housing land supply conclusions (Plan Period 2021/22 to 2038/39)

33. The housing need for the area over the Plan period is **10,278**. Table 3 demonstrates there are **12,065** number of homes. **1,787** more than the need. The supply includes appropriate discounts as shown. (Please note a further 1,980 dwellings are expected to be delivered beyond the Plan period at the West Winch Growth Area)
34. The Housing Trajectory Table is included at Appendix A.

**Table 3: Housing Land Supply 2021-2039**

Supply type	No. Dwellings	With discount applied	Discount applied
Completions (from 2021/2022 excl. 44 dwellings from allocated sites)	359	359	0%
Extant Consents	2,647	2,515	5%
Allocations with planning permissions	2,295	2180	5%
Allocations without planning permission	3,194	3034	5%
Windfall	4,186	3,977	5%
<b>Total Supply</b>	<b>12,681</b>	<b>12,065</b>	
<b>Housing Need</b>	<b>10,278</b>		
<b>Surplus</b>	<b>2,403</b>	<b>1,787</b>	

## Five year housing land supply

35. The following sections discuss the deliverable sites, that is, those that can demonstrate they will be built out before 2027.

### Extant consents

36. There are **1,817** homes benefitting from planning consent within the five year period from 2022/23 to 2026/27.
37. They are all considered deliverable within the plan period and are detailed in the update Housing Trajectory (April 2023), there is no evidence that any of the sites will not be delivered.

### Allocations

38. Within the area, allocated sites currently **with** planning permission will deliver a total of **1,553** net additional dwellings between 2022/23 to 2026/27. The Council believes there to be sufficient, clear and demonstrable evidence that these sites are considered developable within the plan period. The sites and evidence of their deliverability or developability are contained in the updated Deliverability and Developability document (April 2023).
39. Within the area, allocated sites currently **without** planning permission will deliver a total of **243** net additional dwellings between 2022/23 to 2026/27. The council believes there to be sufficient, clear and demonstrable evidence that these sites are considered developable within the plan period. The sites and evidence of their developability are contained in the updated Deliverability and Developability document (April 2023).

## 5 year housing land supply conclusions

40. The requirement to maintain a supply of deliverable sites to provide a minimum of five years' worth of housing against the housing requirement is derived from national policy. For the Local Plan area and for the period 2022-2027, this requirement has been calculated as 2,998 dwellings. (see Table 2).
41. The Council has chosen to discount the supply by 5% as discussed. Therefore, the supply is **4,000** dwellings as shown in Table 4 which is equivalent to 6.67 years' worth of supply. The total deliverable supply is based on the most up to date information as at March 2023.

**Table 4: 5YHLS calculations**

LHN	571	
LHN * 5	2,998	
Annualised 5 year target	599.6	
Supply type	No. dwellings	5% Discount Applied
Extant Permissions	1,817	1,726
Allocations with planning permission	1,553	1,475



Allocations without planning permission	243	231
Windfall	598	568
Total	<b>4,211</b>	<b>4,000</b>
5YHLS calcs	4,211 ÷ 599.6	4,000 ÷ 599.6
5YHLS	7.02	6.67

## Update to Deliverability & Developability Document

42. Following the adjournment of the Local Plan Examination Hearing on the 11 January 2023 the Inspectors wrote to the Council requesting that we undertake the following:

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

43. An update to the Deliverability & Developability Note (DD) has been undertaken and is available in Appendix B. An online survey was undertaken asking landowners/agents/developers of the allocated sites for the following information:

- Ownership Details
- Timescale for Marketing the Site and completing contract with housebuilder
- Timescale for Submission of Planning Application (O/F/RM)
- S106 Required and Timescale for negotiation and signing
- Timescale for any Site Preparation Works
- Start Date for house building
- Build Out Rate
- Timescale for Completions

44. The survey was undertaken between 8 March and 22 March 2023. Responses to the online survey are in Appendix C to this note.

45. Visits to the allocated sites were undertaken between 27 March and 29 March 2023. Information from the online surveys and site visits have informed the update to the DD and the corresponding changes have been made to the Housing Trajectory (April 2023) accordingly.

## Housing Trajectory (April 2023)

46. Following the update to the DD, the following sites are proposed to be de-allocated and have been removed from the Housing Trajectory (April 2023)

**Table 5: Sites proposed for de-allocation**

Site Ref	Address	Reason
E1.11	Southgates	Site is now part of the <a href="#">Southgates</a> Masterplan project which involves major highways and public realm improvements to open up the historic South Gate as a major asset for the town.
E1.15	Bankside West Lynn	There are acknowledged and significant development constraints on this site. There are multiple potential contaminants associated with the site's former uses, and the developable area would be reduced by a 16M flood defence buffer zone. There are no current plans or proposals to bring this site forward.
G34.1	Land South of Wroe	agent confirms they have not been instructed to move remainder of the site forward. Planning permission granted for 1 dwelling which completed in 2021/2022 so moved to the extant permission part of the Housing Trajectory

47. The Council proposes to change the site dwelling numbers stated in the allocation policies for the following allocated sites to reflect the planning permissions that are substantially greater. The higher permitted dwelling numbers have been included in the Housing Trajectory (April 2023).

**Table 6: Allocated Sites – Proposed changes to allocation dwelling numbers**

Site Ref	Address	Existing Allocation No.	Proposed Allocation No.	Reason
F1.4	Downham Market South East	140	300	planning permission granted for 300
G47.1	Land at Cheney Hill	60	133	planning permission granted for 133
G59.2	Land at Herbert Drive	25	44	Planning permission granted for 44
G104.6	Outwell Land surrounding Isle Bridge	35	50	Planning permission granted for 50

48. The Council proposes to change site dwelling numbers for the following allocated sites  
In response to the [Inspectors Action List](#)

**Table 7 Allocated Sites – Proposed changes to allocation dwelling numbers** (reflected in the Housing Trajectory (April 2023))

Site Ref	Address	Reason
E1.6	South of Parkway	Action 54 Permission granted for 226 dwellings
E1.7	Land at Lynn Sport	Action 55 asked for the allocation number to be changed to 82 dwellings to reflect the planning permission but planning permission has now been granted for 96 dwellings. Allocation changed to 96 dwellings.

49. The following sites have already been identified/proposed for de allocation due to sites being completed/near completion or no longer effective as set out in the Council's response to the Inspectors' Matters, Issues and Questions [BCKLWN Matter 5 Statement](#)

**Table 8 Allocated Sites – Proposed de-allocations** (reflected in the Housing Trajectory (April 2023))

Site Ref	Address	Response to Matter 5	Housing Trajectory Note
F2.4	Land North of Hunstanton Rd	Q168 proposed to be removed as an allocation as site now complete	76 dwellings completed in Plan period therefore moved to extant permission section of the housing trajectory.
G13.1	Land to East of Mill Road	Q191 proposed to be removed as an allocation as site now complete	completed prior to plan start date so not included in trajectory
G13.2	Land off the Close	Q191 proposed to be removed as an allocation as site now complete	completed prior to plan start date so not included in trajectory
G25.1	Land between Wild Hill Road and Hall Road	Q200 proposed to be removed as an allocation as site now complete	completed prior to plan start date so has been removed from trajectory
G25.3	Land South of Main Road	Q200 proposed to be removed as an allocation as site now complete	completed in 2021/22 and 2022/23 so moved to extant permissions part of trajectory
G35.3	Land at Lodge Lane/Skye Gardens	Q208 proposed to be removed as an allocation as site now complete	4 dwellings completed within Plan period so moved to extant permissions part of the Housing Trajectory
G47.2	Land to the South of St Mary's Close	Q217 proposed to be removed as an allocation as site now complete	2 dwellings were completed within plan period so included in the extant section of the housing trajectory
G57.1	Land adj. to Marshland St James Primary School	Q219 proposed to be removed as an allocation as site now almost complete	10 dwellings completed within plan period so included in the extant section of the housing trajectory
G59.1	Land a Crown Street	Q223 has been subsumed into a much larger overall site, so is no longer effective and we propose to remove Policy G59.1	Moved to extant planning permission part of housing trajectory

<b>G59.3</b>	Land at Hythe Road	Q223 proposed to be removed as an allocation as site now complete	12 dwellings completed within plan period so included in the extant section of the housing trajectory
<b>G59.4</b>	Land off Globe Street	Q223 proposed to be removed as an allocation as site almost complete	4 dwellings already completed and 1 dwelling due to be completed 2024/25 moved to the extant section of the housing trajectory
<b>G83.1</b>	Land South of Common Road	Q228 proposed to be removed as an allocation as site complete	5 dwellings completed within plan period so moved to extant part of the housing trajectory
<b>G91.1</b>	Land West of No. 26 the Street	Q293 proposed to be removed as an allocation as site complete	5 dwellings completed within plan period so moved to extant part of the housing trajectory
<b>G93.1</b>	Land at Church Bank	Q234 proposed to be removed as an allocation as site complete	4 dwellings completed in plan period so moved to extant permission section of housing trajectory
<b>G93.2</b>	Land Adj. King William Close	Q234 proposed to be removed as an allocation as site complete	All dwellings completed prior to Plan start date so not included in housing trajectory
<b>G104.1</b>	Land north west of Townley Close	Q240 proposed to be removed as an allocation as site complete	5 dwellings completed in plan period so moved to extant permission part of housing trajectory
<b>G104.2</b>	Land south/east of Townley Close	Q239 proposed to be removed as an allocation as site complete	All dwellings completed prior to Plan start date so not included in housing trajectory
<b>G104.4</b>	Land off St Peter's Road	Q239 proposed to be removed as an allocation as site complete	All dwellings completed prior to Plan start date so not included in housing trajectory
<b>G109.2</b>	Land south of Church Road	Q239 proposed to be removed as an allocation as site complete	2 dwellings completed in plan period so moved to extant permission part of housing trajectory
<b>G33.1</b>	Land south of Gayton Road	Q264 proposed to be removed as an allocation as site complete	4 dwellings completed within plan period so moved to extant permissions part of the housing trajectory
<b>G45.1</b>	Land at Nethergate Street	Q273 Site owner confirmed that site will not be taken forward	Removed from housing trajectory
<b>G52.1</b>	Land opposite 143-161 Lynn Road	Q278 proposed to be removed as an allocation as site complete	15 dwellings completed within plan period so moved to extant permissions part of the trajectory
<b>G81.2</b>	Land accessed from Rye's Close	Q287 proposed to be removed as an allocation as site complete	5 dwellings completed within plan period so moved to extant permissions part of the trajectory
<b>G97.1</b>	Land between School Rd & Lynn Road	Q301 proposed to be removed as an allocation as site complete	5 dwellings completed within plan period so moved to extant permissions part of the trajectory
<b>G120.1</b>	Land Adj. Common Road	Q308 proposed to be removed as an allocation as site complete	1 dwelling completed in Plan period so moved to extant permissions part of the housing trajectory

<b>G114.1</b>	Land to the Rear of Natanya	Q314 proposed to be removed as an allocation as site complete	10 dwellings completed within plan period so moved to extant permissions part of the housing trajectory
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Appendix A: Housing Trajectory April 2023



