

Borough Council of King's and West Norfolk

Housing Delivery Test Action Plan

Based upon the 2018 Results

August 2019

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Borough Council of King's Lynn & West Norfolk - Housing Delivery Test Action Plan

1. Introduction & Aims

1.1 This Action Plan has been prepared to provide an overview of housing supply and delivery within the borough. This includes:

- The both the national and local contexts
- Setting out current housing supply through an up-to-date housing trajectory and five year housing land supply position
- Exploring past housing delivery in King's Lynn and West Norfolk, which is a key component to the Housing Delivery Test (HDT)
- Outline the many proactive measure the Borough Council is currently taking to ensure it meets its Local Housing Need (LHN)
- Detailed analysis of the latest housing trajectory schedule and other data sources from a housing supply and delivery perspective
- And establish a series of appropriate actions necessary to increase both supply and delivery in the future based on the above.

1.2 The Action Plan is intended to be a live document that will be monitored through our Authority Monitoring Report (AMR) and updated annually following the publication of Housing Delivery Test (HDT) results by Government (anticipated each November), if required.

1.3 Given all of the activities the Borough Council (BC) is undertaking which contribute to planned housing delivery it is imperative that the BC retains an element of control. Especially given the long term nature of many of these strategic projects. Clearly mass unplanned development could have a detrimental impact upon these and the very fabric of the borough.

1.4 It should be noted that this Action Plan has been prepared in the first half of 2019. Accordingly it is not possible to take account of any political or economic changes that may occur post the preparation of the Action Plan such as Brexit, Government changes or future financial difficulties.

2. National Context

- 2.1 In order for Local Planning Authorities (LPA) to use their Local Plan effectively, the Plan must be up-to-date, the LPA should be able to demonstrate a positive 5 year housing land supply position, and pass the newly introduced Housing Delivery Test (HDT).
- 2.2 So the Local Plan must meet the LPA's housing need over the plan period, maintain an adequate supply of housing land, and attempt to ensure that these houses are actually delivered.
- 2.3 This is set out in some detail within the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), and associated publications (such as the HDT rule book).
- 2.4 The National Planning Policy Framework (NPPF) was updated in 2018 and further technical revisions took place in 2019. As well as introducing the HDT the revised NPPF also sets out how LPA's should calculate their Local Housing Need (LHN) through the newly introduced Standard Methodology.
- 2.5 This is a step change in that previously LPA's were benchmarked against supply, i.e. ensuring enough allocations were made and permissions granted. However, LPA's are now tested against housing delivery. This is something which isn't totally within the LPA's control.

3. Local Context: Local Plan & Review

- 3.1 The Borough Council's (BC) Local Plan currently comprises the Core Strategy (CS), adopted in 2011, and the Site Allocations and Development Management Policies Plan (SADMP), adopted 2016.
- 3.2 The CS 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.
- 3.3 The SADMP gives effect to this and compliments the CS. This is done so through the provision of allocations for land uses including housing and economic land to meet aspirations of the CS. It also provides a series of detailed development management policies which will assist in guiding development. The plan period covered by the Local Plan is from 2001 through to 2026.
- 3.4 As part of the SADMP examination the BC agreed to commence an early review of its Local Plan (CS & SAMP) and create one single plan document which covers the longer term (to 2036). This is enshrined in Policy DM2A of the SADMP:

Figure 1: Policy DM2A

Policy DM2A - Early Review of Local Plan

An early review of the Local Plan will be undertaken, commencing with the publication of a consultation document (a Draft Local Plan) in 2016. This is set out in the Local Development Scheme (LDS). An early review will ensure a set of deliverable and achievable housing sites for the duration of the Plan period, with the most up to date policy framework to secure continuity for the longer term.

The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with national policy (National Planning Policy Framework).

Source: https://www.west-norfolk.gov.uk/download/downloads/id/2491/sadmp_plan_adopted_2016.pdf

3.5 Indeed this policy was adhered to and in 2016 the BC commenced the review. The Local Plan review will cover the plan period from 2016 through to 2036. A call for sites and policy suggestions consultation was held towards the end of 2016. In early 2019 a consultation on the draft version of the Local Plan review was carried out for period of 8 weeks. A timetable for the production of the Local Plan review is contained within the BC's Local Development Scheme (LDS) which available via the link below:

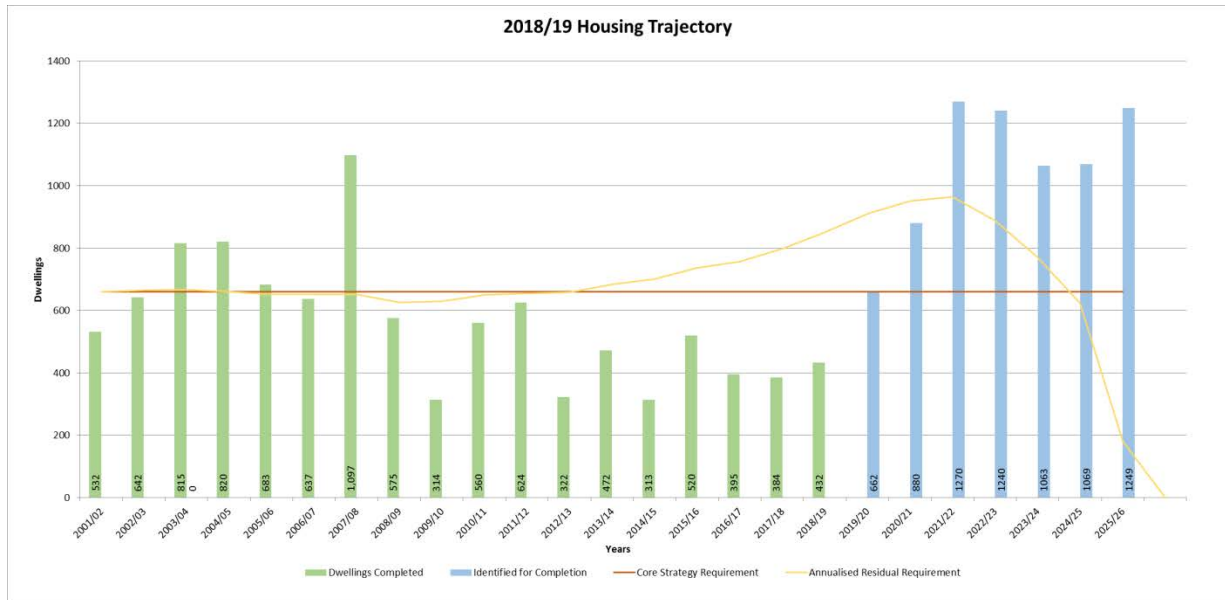
https://www.west-norfolk.gov.uk/info/20214/emerging_local_plan_review/500/local_development_scheme

3.6 It is important to note that time alone is not the factor for which a plan is considered up-to-date or not. How consistent the plan's policies are with the latest / current NPPF is of great relevance.

4. Housing Trajectory

4.1 The 2018/19 trajectory is provided to show progress against the Core Strategy housing target of 16,500 new homes, and is shown below:

Figure 2: BC 2018/19 Housing Trajectory



4.2 The trajectory graph plots the borough-wide housing trajectory for the plan period (2001-2026). This is based on the annual completions to date (shown in green) and those dwellings identified completion over the remainder of the plan period (shown in blue). In this graph, the annualised residual requirement (indicated via a yellow line) shows the annual average completion rate which should be sustained to the end of the plan period in order to meet the strategic requirement of housing completions set by the Core Strategy of 16,500 dwellings by 2026.

4.3 It can be seen that to date this has remained very close to the original annual target, falling below it in the mid-2000s, when delivery exceeded that planned, and rising above it in the last couple of years reflecting reduced delivery following the 2008 economic crash and subsequent recovery period. It also shows that it is expected to fall rapidly in the near future, anticipating the impact of the Site Allocations and Development Management Policies Plan (SADMP) and a recovering economic situation, reaching a residual target of zero by the end of the plan period when it is anticipated that whole of the Core Strategy target could be been achieved.

4.4 The trajectory illustrates that the majority of existing outstanding permissions will be developed within the next five years (see the housing trajectory schedule for detail). It anticipates that completions will increase to once again exceed target levels in 2019/20, as a result of further recovery of the economy and availability of substantial new allocations of

the Site Allocations and Development Management Policies Plan. A significant proportion, around 80%, of the residential housing allocations contained within the Local Plan have already been granted planning permission, and indeed some have contributed towards completion figures already. It should also be noted that the allocations are all expressed as a minimum figure and that we have already seen a large number of sites come forward in excess of the at least number quoted within the relevant policy.

- 4.5 Overall the Trajectory shows that there is sufficient capacity to meet the Core Strategy Housing Requirement within the plan period. However, it should be highlighted that no account for possible Brexit outcomes or for any future financial difficulties.

5. Five Year Housing Land Supply

- 5.1 As touched upon earlier LPA's should ensure that they maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement. Therefore, LPA's should have an identifiable five year housing land supply at all points during the plan period.
- 5.2 NPPF makes it clear that the Local Housing Need (LHN) for the purpose of plan-making and 5 year housing land supply calculations if the Local Plan was adopted over 5 years ago, should be calculated using the standard methodology. This was introduced by the revised framework, 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.
- 5.3 Following the standard method, the current LHN figure for the Borough of King's Lynn and West Norfolk is 555 dwellings per year. Note this uses data as advocated by the standard methodology. This comprises the 2014 – Based Household Projections in England (2016) and the 2018 Median Work Based Affordability Ratio (April 2019) both published by the Office for National Statistics (ONS).
- 5.4 The relevant five year period is 2018/19 to 2023/2024 (financial years). The Sedgefield method has been used for the purpose of the calculation; this is consistent with the PPG.
- 5.5 Table 1, overleaf, is an appreciation of the various sources of housing supply taken from the 2018/19 housing trajectory. Note that a 10% lapse rate has been applied to planning permissions, this recognises that some permissions may either lapse or not complete within the five year time period, as currently envisaged. Such a rate has not been applied to the Local Plan allocations adopted in September 2016 as part of the Site Allocations and Development Management Policies Plan (SADMP). This is because all of the allocations are expressed as 'at least x' number of dwellings. The consequence of this has seen SADMP allocations come forward with planning proposals, and gain permission, for much higher numbers than the minimum stated by the relevant policy.
- 5.6 An allowance for future windfall is made within the calculation. This is based upon windfall completions since the start of the plan period, 2001/2002. For the purpose of this 5 year land supply calculation a 25% reduction has been applied to recognise that land is a finite resource. As well as this the windfall allowance has only be factored into the final two years of the five year calculation, allowing a three period for such developments to come forward. This approach is in accordance with the NPPF.
- 5.7 It should also be noted that the latest definition of what constitutes a deliverable site has been used in accordance with the NPPF & PPG.

Table 1: Housing Supply

| Housing Supply Source | |
|--|--------------|
| Extant consents on unallocated sites (10+) | 840 |
| Extant unallocated sites (5-9) units | 200 |
| Extant consents for small sites (1-4 units) | 1022 |
| Sub Total | 2,062 |
| 10% Lapse Rate | 1,856 |
| SADMP 2016 Allocations | 2,509 |
| ACP Additional Sites | 88 |
| Neighbourhood Plan Allocations | 0 |
| Windfall - large sites 10+ (131 p.a. years 4 & 5 only) | 262 |
| Windfall - small sites (97 p.a. years 4 and 5 only) | 194 |
| Total Identified Supply | 4,909 |

5.8 The table above concludes that the identified supply is 4,909 dwellings for the 5 year period, from 2018/19 to 2023/2024.

5.9 The NPPF states that the level of the buffer to be applied is determined by the Housing Delivery Test (HDT) result. The BC's 2018 result will be discussed later, but the score is 91%. Therefore in accordance with the NPPF the buffer to be applied is 5% (to ensure choice and competition). We are not currently seeking to confirm this at a local plan examination or as part of an annual statement post a LHN plan being adopted. Accordingly a 10% buffer is not applicable and as the Housing Delivery Test result is above 85% so a 20% Buffer is not applicable.

5.10 The table below provides the 5 year housing land supply calculation:

Table 2: Land supply calculation

| | |
|---|-------------|
| LHN (555) x 5 (Years) | 2,775 |
| LHN x 5 + 5% (NPPF Buffer) | 2,914 |
| Identified Supply (4,909) / LHN x 5 + 5% Buffer | 1.68 |
| Above x 5 (Years) | 8.42 |

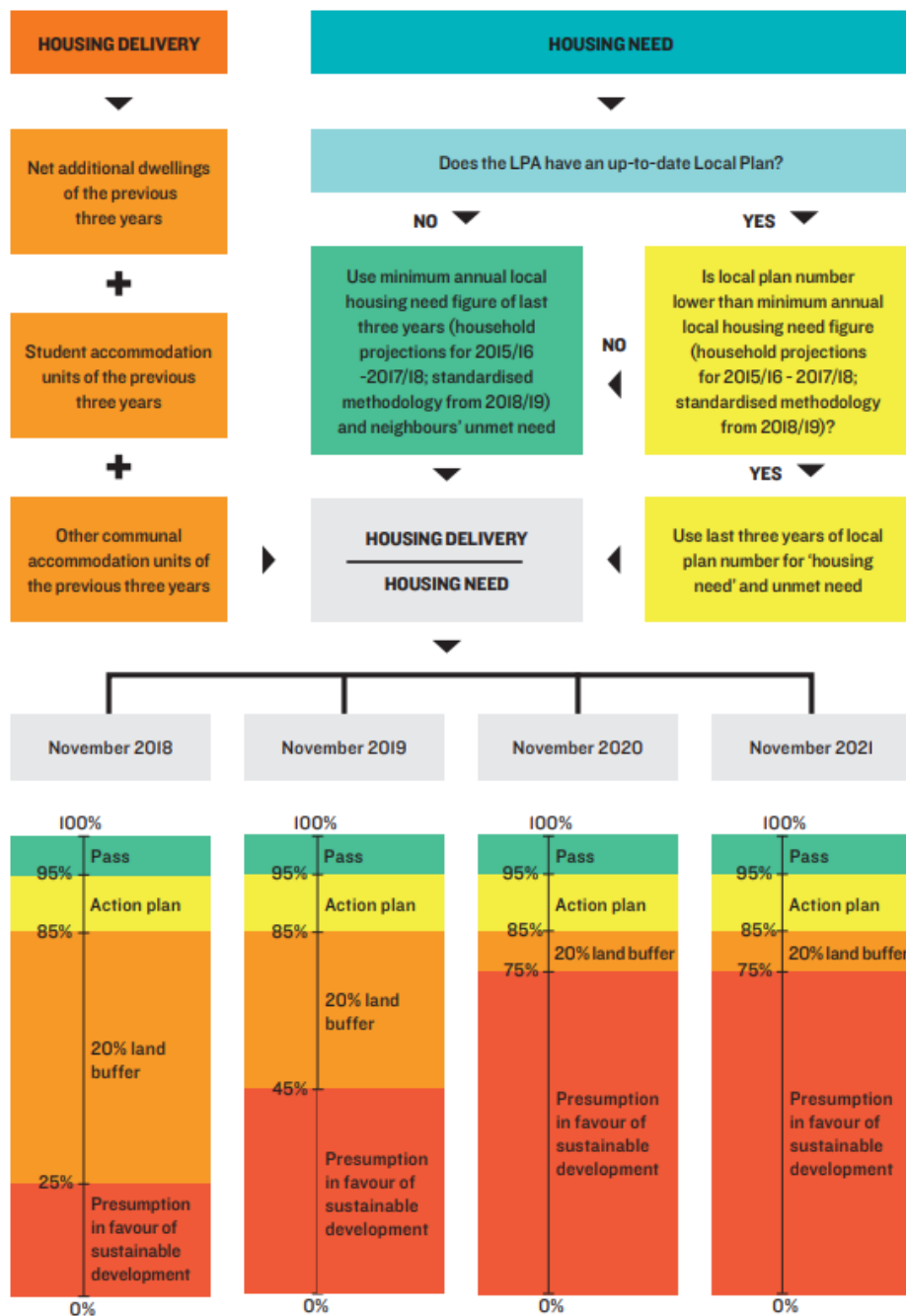
5.11 Therefore following the standard method for calculating Local Housing Need (LHN) the BC is currently able to demonstrate a 5 year housing land supply position significantly higher than 5 years' worth, with the calculated result being 8.42 years' worth of supply. The full housing trajectory and schedule for sites can be viewed via the link below:

https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan

6. The Housing Delivery Test

- 6.1 The National Planning Policy Framework (NPPF) was updated in 2018 and further technical revisions took place in 2019. The revised NPPF introduces a further test for LPA's known as the Housing Delivery Test (HDT).
- 6.2 As the name suggest this looks at actual housing delivery. Which data sources to use are set out in some detail the HDT rule-book:
<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>
- 6.3 Broadly, the HDT is the Government's assessment of whether LPAs are overseeing development of enough homes for their area. It is presented as a percentage of homes delivered against the number required over the past three years – with 95% constituting a 'pass'.
- 6.4 The consequences get tougher the greater the delivery gap. Missing the 95% pass mark but meeting at least 85% of housing requirement results in the need to prepare a HDT Action Plan. Falling below the 85% mark results in the need to prepare the Action Plan and also include a 20% buffer within the five year housing land supply calculation. Fall below the 25% mark and as well as the above measures the presumption in favour of sustainable development is engaged. Note these are only the thresholds for the 2018 results. The threshold for the engagement of the presumption in favour of sustainable development steadily rises over time, see figure 2 (overleaf).
- 6.5 Data on housing completions is collected from LPA's by the Ministry of Housing Communities and Local Government (MHCLG). The intention is that MHCLG then publish the HDT result in November each year. This position is then 'fixed' until the results are published the following the year.
- 6.6 The results dictate what penalties are bestowed upon the LPA and if action is required to be taken. This is best illustrated by the diagram published by Lichfield's reproduced on the next page:

Figure 2 : Housing delivery test methodology



Source: https://lichfields.uk/media/4468/housing-delivery-test_september-2018pdf.pdf

6.7 The BC results for 2018 are provided in the table below. This has been taken from the results published by MHCLG:

Table 3: HDT 2018 results

Housing Delivery Test: 2018 measurement

| Area Name | Number of homes required | | | Total number of homes required | Number of homes delivered | | | Total number of homes delivered | Housing Delivery Test: 2018 measurement | Housing Delivery Test: 2018 consequence |
|------------------------------|--------------------------|---------|---------|--------------------------------|---------------------------|---------|---------|---------------------------------|---|---|
| | 2015-16 | 2016-17 | 2017-18 | | 2015-16 | 2016-17 | 2017-18 | | | |
| King's Lynn and West Norfolk | 499 | 500 | 448 | 1,447 | 505 | 412 | 401 | 1,318 | 91% | Action Plan |

Source: <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

6.8 The results show that there is need for the BC to prepare a HDT Action Plan, with a 91% score. Just falling short of the 95% pass mark. LPA's have six months to prepare their Action Plan from the publication of the results. The 2018 results were actually published on the 19 February 2019 and not November 2018 as originally envisaged, most likely due to technical revisions to the NPPF, so the BC HDT Action Plan should be prepared around the 19 August 2019.

6.9 The BC has decided to take the Action Plan through Cabinet, as it is of importance, to raise awareness across the Council and because the actions cover a number of functions with the BC. This may lead to a slight delay in final publication however; this is considered to be worthwhile.

6.10 The PPG contains information as to what the Action Plan could cover:

- Identify the reasons for under-delivery;
- Explore ways to reduce the risk of further under-delivery; and
- Set out measures the authority intends to take to improve levels of delivery.

6.11 An Action Plan is intended to be a practical document, focussed on effective measures aimed at improving delivery within an area. It should be underpinned by appropriate evidence, research and local understanding.

7. Monitoring

7.1 The BC recognises the importance of monitoring housing completions and has in the past 18 months comprehensively reviewed and completely changed the way that housing completions are monitored. This has evolved into a more smarter approach utilising technology and intelligence captured by other BC functions and other organisations, the main methods of data collection now include:

- Using dedicated computer software to record information
- Dedicated team established for monitoring purposes
- Intelligence from BC Council Tax department
- Information from the Valuation Office Agency (VOA) via Geo-Place
- BC waste and refuge information
- Street Naming & Numbering Intelligence
- Community Infrastructure Levy (CIL) information
- Condition monitoring information
- Ordnance Survey (OS) mapping updates. Through a service level agreement OS shows new build housing on a map within 3 months
- Planning officer information
- Actually contacting the owners/agents/developers of the site

8. Actions the Borough Council is taking to ensure more homes are built

8.1 The Borough Council recognises its responsibility, not only as a Local Planning Authority, to ensure the Local Housing Need (LHN) is met. The table below summarises the many ways in which the BC is striving across its functions to facilitate this.

Table 4: BC Activities to increase housing

| Activity | Overview | Link for further information |
|---|--|---|
| BC Major Housing Project Partnership With Lovell's | <ul style="list-style-type: none"> Partnership with Lovell's House Builders To provide housing on land owned by the Borough Council To deliver approx. 1,000 Homes by 2026 BC has stepped in where the market has not delivered much need housing Delivering quality homes which are policy compliant, showing the way A number of sites are underway and have/ are delivering homes | https://www.west-norfolk.gov.uk/info/20171/major_housing_project |
| Housing Company & Affordable Housing Company established | <ul style="list-style-type: none"> Established as a Registered Provider to provide affordable housing Also to provide market rental housing of any houses that might not sell on the open market on BC sites | |
| Homes England (ACP) Accelerated Construction grant funding | <ul style="list-style-type: none"> BC has received approx. £10.6m across seven BC sites from Homes England This will ensure that the completion of approx. 1,000+ homes are accelerated Includes NORA phase 4 which will be utilising modern methods of construction / modular housing. Will be one of the first major sites in England to do so | https://www.west-norfolk.gov.uk/info/20171/major_housing_project |
| BC active involvement with the West Winch Growth Area to break-down barriers and unlock the housing potential | <ul style="list-style-type: none"> Large strategic site, allocated within the BC Local Plan. some 4,000 homes in the fullness of time BC with consultants has prepared an Infrastructure Delivery Plan (IDP) Design and planning application for the housing access road is | Cabinet Report (item CAB91): https://democracy.west-norfolk.gov.uk/ieListDocuments.aspx?Cid=134&Mid=2463&Ver=4 |

| Activity | Overview | Link for further information |
|---|---|---|
| | <p>being prepared by the BC and Norfolk County Council (NCC)</p> <ul style="list-style-type: none"> • The northern portion (1,100 homes) has come forward with a planning application (Hopkins Homes) • The remainder of the site – the BC is working with the 17 landowners (including the preparation, in collaboration, of a Land Owner agreement) to enable the site to come forward and ensure the wider infrastructure is provided | |
| King's Lynn Heritage Action Zone (HAZ) | <ul style="list-style-type: none"> • Through partnership working with Historic England, NCC, the LEP and others unlocking brownfield sites within King's Lynn for either development or redevelopment bringing them either back into active use or a more productive use | https://historicengland.org.uk/services-skills/heritage-action-zones/kings-lynn/ |
| Custom and Self-Build (C&SB) & Action Plan implementation | <ul style="list-style-type: none"> • BC recognises the importance of C&SB housing as this will not only provide opportunities for those wishing to build or commission the build of their own home but also assists with the supply and the delivery of housing • BC with support from Mario Wolf (the head of the National Custom & Self Build Association (NaCSBA) / Right to Build Task Force) have published an C&SB Action Plan with a suite of measure which will create a policy environment which encourages custom and self-build opportunities • BC committed to considering building out some of its own sites as C&SB • Gone beyond the requirements by commissioning and publishing one the country's first C&SB needs assessments | https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/721/custom_and_self_build_action_plan |
| Local Plan & review | <ul style="list-style-type: none"> • Allocated a range/mix of sites in terms of size, location, and nature | <p>Current Local Plan:</p> https://www.west-norfolk.gov.uk/homepage/23/curr |

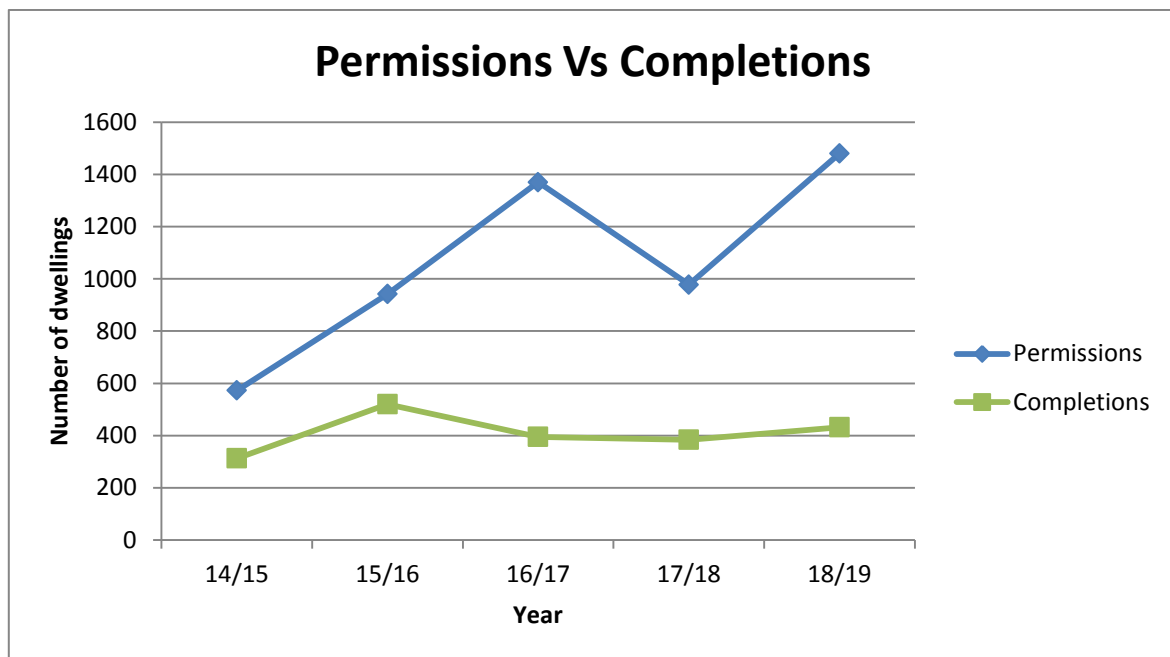
| Activity | Overview | Link for further information |
|------------------------|--|---|
| | <ul style="list-style-type: none"> Actively reviewing the Local Plan to ensure it meets the Local Housing Need (LHN) The review seeks to create more opportunities for housing to come forward in a sustainable and sensitive manner Existing allocations will be reviewed, endorsed or possibly de-allocated. Based upon deliverability New Strategic Housing Market Assessment (SHMA) has been commissioned. A Local Plan viability study will follow | ent_local_plan Emerging Local Plan review: https://www.west-norfolk.gov.uk/homepage/251/emerging_local_plan |
| Development Management | <ul style="list-style-type: none"> Data shows that planning decisions are being made in an efficient timely fashion in accordance with Government regulations A pre-application process is available to developers and is actively encouraged where appropriate An agent's forum exists allowing constructive dialogue between planning agents and the BC | Planning Applications: https://www.west-norfolk.gov.uk/info/20077/planning_applications Pre-application Advice: https://www.west-norfolk.gov.uk/info/20077/planning_applications/105/get_advice_before_making_an_application |
| Neighbourhood Plans | <ul style="list-style-type: none"> As part of the duty to assist those communities who are interested in preparing a neighbourhood plan for their area, where appropriate the BC will support those plans who seek to provide opportunities for housing for example through site allocations | https://www.west-norfolk.gov.uk/info/20127/neighbourhood_plans |
| Housing Monitoring | <ul style="list-style-type: none"> Active collection from of a range of data sources including direct from the site controller to build a picture of development across the borough (see section 7). Has led to production of the BC's Authority Monitoring Report (AMR) | https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr |

8.2 From the table above it is evident that the BC not only takes its role in meeting the housing need seriously but does so with a proactive and often innovative approach.

9. Housing Supply & Delivery Analysis

9.1 The logical starting point is how many homes have been granted planning permission recently and how many homes have actually been delivered /completed. Earlier within this action plan it has been shown that the BC can demonstrate well in excess of the minimum 5 years supply requirement. And that the HDT result is 91%. The chart below show the number of permissions granted over the past five years against the number of completions on a yearly basis:

Chart 1: Permissions Vs Completions

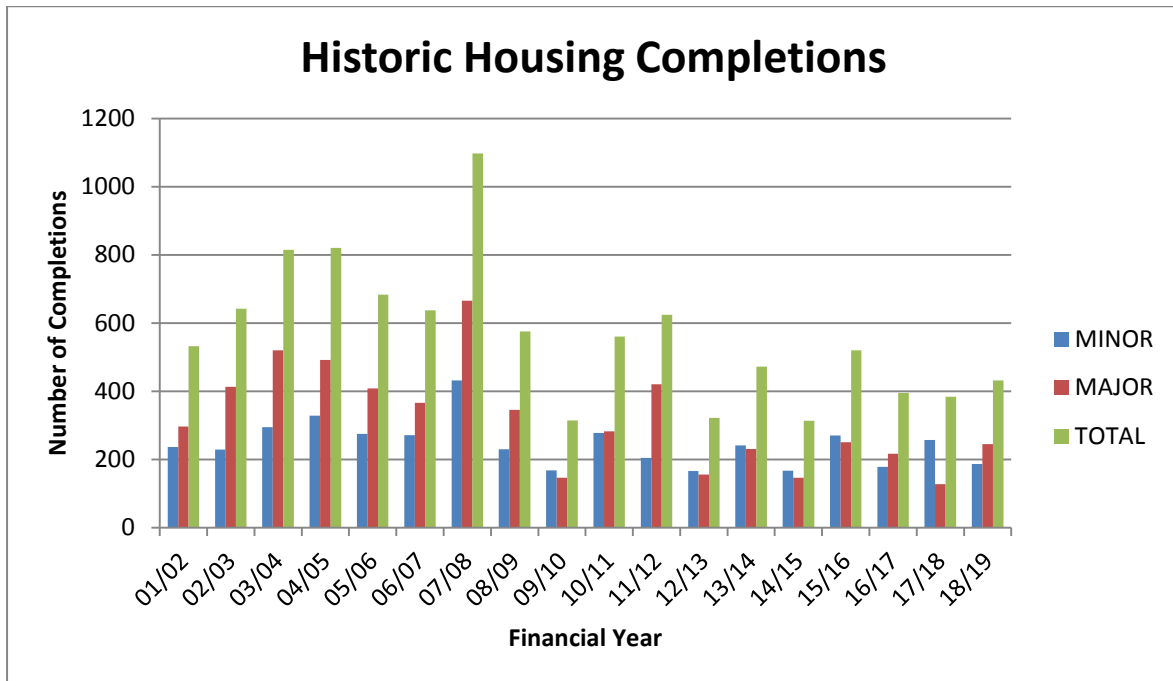


9.2 The chart shows that the number of permissions granted is far in excess of the level of completions. Although it should be noted that a direct comparison is difficult as clearly it takes time from the point a site receives planning permission through to completion. As an example the completions in 18/19 were in the mid 400's whilst permissions granted two years previous (16/17) are in the region of 1,400. Overall in the past five years there have been 5,343 new homes which have been granted permission and 2,044 new homes have been completed. This is a gap of 3,299 homes.

9.3 There is currently permission for 3,408 new homes in borough which have not commenced. Of this 1,831 (54%) are in Outline and 1,577 (46%) have either a Full or Reserved Matters permission in place. This shows there is a relatively large stock of permissions which could be converted into homes on the ground, but either hasn't as yet because they haven't had enough time to do so or because the controller of the site isn't moving the site forward as quickly as they might be able to.

9.4 Looking at completions to date since the start of the plan period (2001/02) should give a clear indication of how dwellings are on major sites (10+ dwellings) and how many are on minor sites (less than 10 dwellings). This illustrated by the chart below:

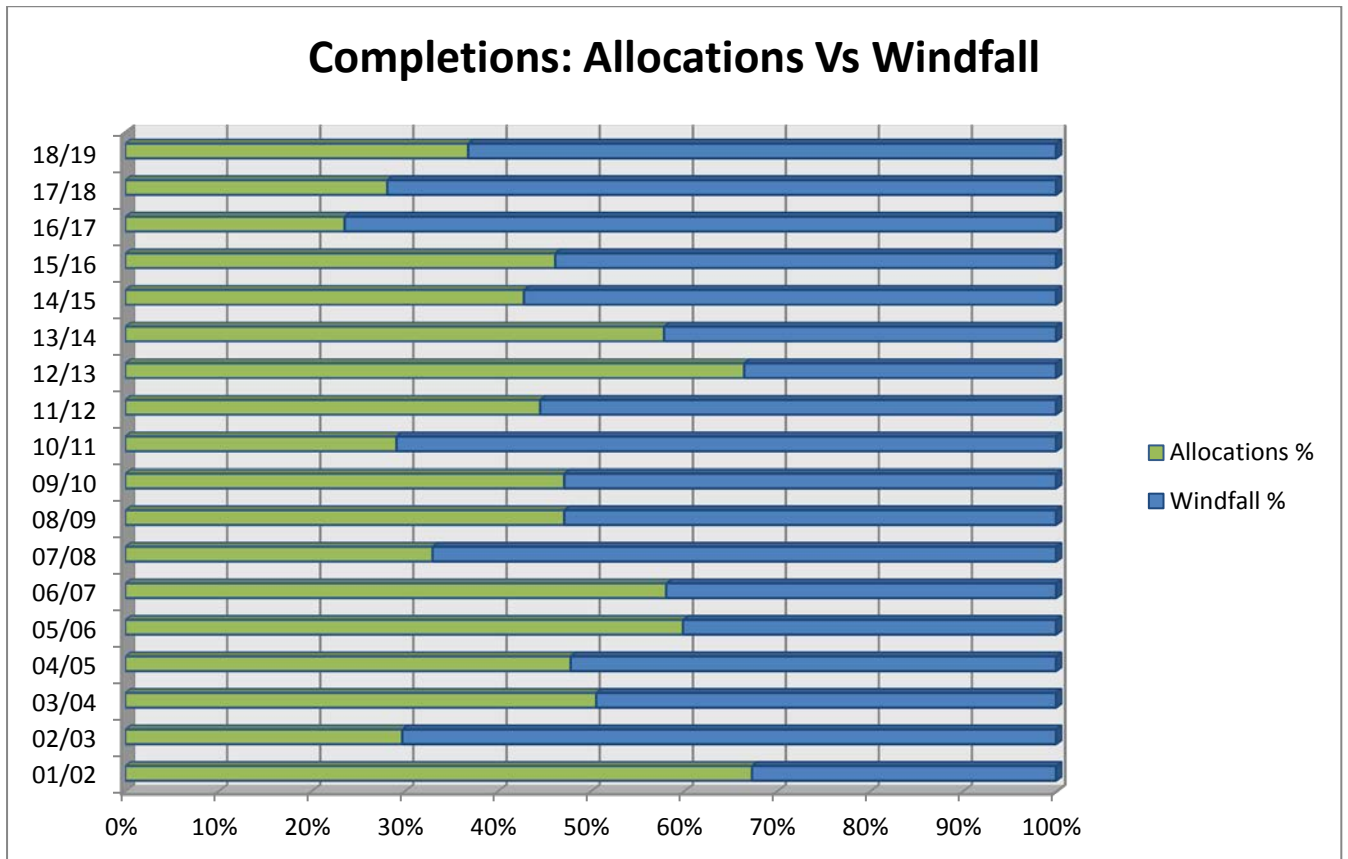
Chart 2: Historic Housing Completions, minor vs major



9.5 Overall 10,137 homes have completed since the start of the current plan period. Of this 4,412 (44%) homes are from minor sites, and 5,725 (56%) homes are from major sites. This highlights that there is a relatively balanced level of completions coming forward from large and small sites.

9.6 Another key factor is assessing the contribution of housing completions from sites allocated with the Local Plan and those from windfall sites (not allocated within the Local Plan). This is illustrated by the chart below:

Chart 3: Completions, Allocations Vs Windfall



9.7 Chart 3 shows that there are significant contributions from both allocations and windfall sites, since the start of the plan period. The overall % of each is 45% from allocations and 55% from windfall. Clearly completions from windfall sites make a significant contribution. Prior to the adoption of the Site Allocations & Development Management Policies Plan (SADMP) in 2016, no site allocations had been made since the adoption of the previous Local Plan in 1998. Without the contribution from windfall sites it highly likely that the BC would struggled to demonstrate a healthy five year housing land supply position.

9.8 The Local Plan, the review and land supply calculations all contain an allowance for future windfall. This excludes the first 3 years to allow time for any such development to come forward. It also contains a 25% reduction acknowledging that land is a finite resource. Although there is an argument given that the planning system is flexible in terms of housing both nationally and locally with regards to windfall development that this reduction should be removed. The table below shows the windfall contribution over the plan period, the average per year, and the windfall allowance per year with the reduction factored in.

Table 5: Windfall Allowance

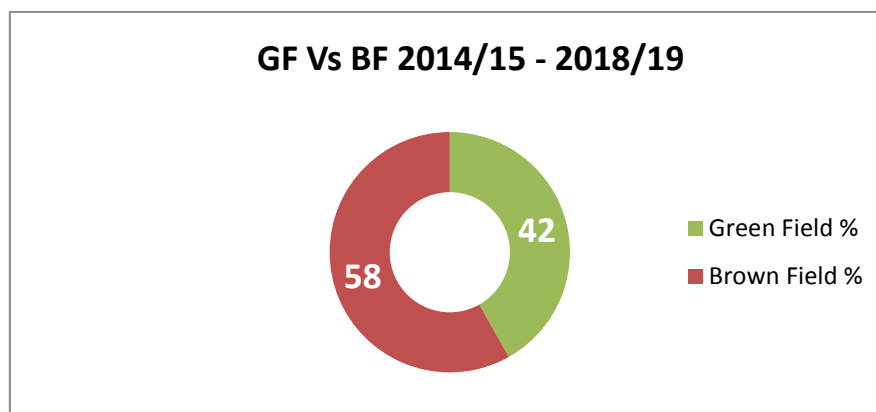
| Financial years of completions | Total | Average pa | 25% Reduction | Assumed Rate |
|--|-------|------------|---------------|--------------|
| Unallocated (completion units - large schemes on unallocated sites) | 3,132 | 174 | *75% | 131 |
| Unallocated - Minor Sites (Less Than 10 Dwellings) | 4,370 | 243 | | |
| * minor sites - garden land and greenfield | 1,877 | 104 | | |
| * minor sites - brownfield non garden land | 2,330 | 129 | *75% | 97 |
| Total Windfall | 5,462 | 303 | *75% | 228 |

9.9 By examining the contribution windfall sites make to both the supply and completions it is possible to establish how flexible and supportive of housing delivery the Local Plan and local policy framework is. Clearly windfall development has made a significant contribution and it is anticipated to continue to do so. The draft Local Plan review seeks to create more opportunities for windfall sites to come forward through draft policy LP26 where subject to criteria it may be possible for development to take place outside of defined settlement development boundary. Link to LP26:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883815232#section-s1542883815232>

9.10 In analysing the housing completions it is important to recognise if the homes are coming forward on Greenfield or Brownfield/previously developed land. Chart 4 looks at the completions over the last five years:

Chart 4: Greenfield Vs Brownfield



9.11 This shows that there is a balance between the two different types of sites, which is interesting given the rural nature of the borough, the size and that there are only three towns. The BC does publish an maintain a brownfield register, currently this shows that there a large number of sites which are brownfield /previously developed land which already is either allocated within the Local Plan or has planning permission. This means that the controller of the sites can either progress to gaining an implementable planning permission or commence on site (depending upon the permission type). The BC brownfield register can be viewed via the link below:

https://www.west-norfolk.gov.uk/info/20079/planning_policy/617/brownfield_register

9.12 Looking at the following categories of housing supply: Local Plan allocations, sites of 10 or more homes and sites with between 5 and 9 homes. We have given each site a 'RAG' rating based upon the progress of the site in delivering homes. The number of sites and dwellings are provided:

Red = no current/recent activity

Amber = some recent activity / working towards a start on site

Green = on site / homes being built / partially completed

9.13 The results of this are as follows:

| Housing Supply Source | Green Sites | No. Houses Not Started | Amber Sites | No. Houses Not Started | Red Sites | No. Houses Not Started |
|------------------------|-------------|------------------------|-------------|------------------------|-----------|------------------------|
| Local Plan Allocations | 23 | 244 | 38 | 3,888 | 22 | 747 |
| Sites of 10 + houses | 9 | 149 | 3 | 50 | 5 | 138 |
| Sites of 5 -9 houses | 8 | 14 | 10 | 59 | 7 | 41 |

9.14 Another critical factor in the delivery of a site will be who is in control of the site. We have attempted to establish this through our proactive monitoring process (including information from the site controllers themselves) and how many homes each have permission for but have not yet started. In order to be able to draw conclusions the following broad groups of site controllers have been established:

- The Borough Council
- House Builder – someone who will build out the site
- Developer – someone who is primarily concerned with developing the site but not building it out
- Landowner – owns the site but unlikely to build it out
- Combinations of the above
- Unknown – currently not known

The results are presented overleaf and again the 'RAG' rating is shown for completeness

Local Plan Allocations

| Site Controller | No. of Sites | Green | Amber | Red | No. Houses Not Started |
|----------------------------|--------------|-------|-------|-----|------------------------|
| BCKLWN | 9 | 2 | 7 | 0 | 171 |
| BCKLWN & Site Owner | 1 | 0 | 1 | 0 | 385 |
| Developer | 4 | 0 | 2 | 2 | 1,107 |
| House Builder | 41 | 18 | 22 | 1 | 662 |
| Land Owner | 29 | 0 | 10 | 19 | 445 |
| Land Owner / Developer | 2 | 0 | 2 | 0 | 56 |
| Land Owner / House Builder | 9 | 3 | 6 | 0 | 127 |

Sites of 10 + houses

| Site Controller | No. of Sites | Green | Amber | Red | No. Houses Not Started |
|----------------------------|--------------|-------|-------|-----|------------------------|
| BCKLWN | 5 | 5 | 0 | 0 | 0 |
| Developer | 2 | 0 | 0 | 2 | 40 |
| House Builder | 23 | 15 | 8 | 0 | 421 |
| Land Owner | 16 | 2 | 4 | 10 | 300 |
| Land Owner / House Builder | 1 | 0 | 1 | 0 | 18 |
| Unknown | 2 | 0 | 0 | 2 | 114 |

Sites of 5 -9 houses

| Site Controller | No. of Sites | Green | Amber | Red | No. Houses Not Started |
|-----------------|--------------|-------|-------|-----|------------------------|
| BCKLWN | 1 | 0 | 1 | 0 | 8 |
| Developer | 2 | 0 | 0 | 2 | 11 |
| House Builder | 24 | 18 | 6 | 0 | 55 |
| Land Owner | 14 | 2 | 6 | 6 | 76 |

9.15 What this analysis illustrates is that there are a relatively large number of sites and therefore homes which have planning permission and that very little progress has been achieved since planning permission was granted. The majority of such sites are either in the hands of landowners and to a lesser extent developers.

9.16 The BC as the Local Planning Authority has an influence upon sites delivery in terms of the time taken to make planning decisions. The performance of the Development Management department is measured by Government. As stated in the Town and Country Planning (Section 62A Applications) (Amendment) Regulations 2016, applications are designated separately into major development and non-major development applications. The assessments for each of these categories (major and non-major) are based on two performance measures: speed and quality which is clearly stated in the 'Improved planning performance' (2018) document sections 8 & 9; the assessment for performance is stated below:

- The speed of which applications are dealt with measured by the number of applications dealt with within the statutory time or agreed period of extension
- The quality of decisions made by local planning authorities measured by the number of decisions on applications that are afterwards overturned at appeal

9.17 In terms of the statutory period for non-major development applications this is 8 weeks and for major development applications it is 13 weeks, unless an application is subject to an Environmental Impact Assessment (EIA), in which case a 16 week period will apply in this instance. An extended period can be agreed through a planning performance agreement or an agreed extension of time which should be in writing and agreed before the statutory determination period.

9.18 The 'Improving Planning Performance – Criteria for Designation' document was published by the Government in 2013 which introduced the two separate measures against which the performance of local authorities would be assessed. The thresholds for designation have changed slightly in the last few years. For major development applications revisions have been made by the government in this document increasing the threshold for the speed of decisions to go up from 50% in 2017 to 60% in 2018. The thresholds for the quality of decisions were decreased from 20% in 2015 to 10% in 2018.

9.19 The government also laid a revised version before Parliament in 2016 which referred to non-major development applications. The threshold for designation were set for speed measure at 65 % in 2017 and increased to 70% in 2018, the quality of decisions were set at 10% in 2018.

9.20 In reference to the revised criteria document, the table below states the updated threshold assessment local authorities must hit in relation to decision performance, table 6. Table 7 shows the 2018/2019 and 2019/2020 decision performance (%) statistics for King’s Lynn & West Norfolk. The statistics show that for major applications each quarter is above the minimum (70%) and non-major developments are above the threshold performance target of 80% for all quarters.

Table 6: Designation thresholds and assessment period overview

| Measure & type of application | Threshold & Assessment period October 2017 to September 2019 | Total decision performance (%) |
|--|---|--------------------------------|
| Speed of major development | 60% | 70% |
| Speed of non-major development | 70% | 80% |
| Quality of major & non-major development | 10% | |

Table 7: Decision performance (%)

| Decision Performance % | | | | | |
|------------------------|--------|--------|-------|-------|-----------|
| | Q1 | Q2 | Q3 | Qt4 | Full year |
| 2018/19 | | | | | |
| Major | 100.00 | 100.00 | 77.77 | 95.00 | 93.87 |
| Minor | 87.69 | 89.38 | 87.69 | 90.96 | 88.84 |
| Other | 89.89 | 92.85 | 96.44 | 97.47 | 94.27 |
| 2019/20 | | | | | |
| Major | 92.85 | 94.11 | | | |
| Minor | 93.61 | 92.46 | | | |
| Other | 94.79 | 94.90 | | | |

9.21 This shows that the planning department is performing well in terms of the Government measures, and would appear not to be holding back in the granted of planning permission for housing development where appropriate.

9.22 Bellow looks into how many of the applications that have been presented to the BC Planning Committee, in recent times, have been refused contrary to officer recommendation for approval:

Table 8: Permissions refused by Planning Committee contrary to officer recommendation

| Total number of applications from Jan 18- Jun 19 | Total number of decisions permitted | Total number of decisions refused contrary to officer recommendation |
|--|-------------------------------------|--|
| 132 | 115 | 17 |
| Percentage of decisions made by planning committee | 87.1% | 12.8% |

| Total number of decisions refused contrary to officer recommendation | Total number of resubmissions permitted | Total number of resubmissions pending consideration | Total number of appeals | No further action |
|--|---|---|-------------------------|-------------------|
| 17 | 5 | 4 | 5 | 3 |
| 100% | 30% | 23% | 30% | 17% |

9.23 Although within the Planning Committee’s right to do so, two of those applications refused by the Planning Committee were for allocations in the Local Plan which totals 1,000 new homes. One was appealed and gained permission for 300 new homes and the other; the planning agents have singled their intent to appeal.

9.24 Looking into the situation further the reasons as to why the Planning Committee refused the applications contrary to officer recommendation for refusal are as follows:

Table 9: Reasons for Refusal

| Reason for Refusal | Tally of Similar Reasons for Refusal |
|--------------------------------------|--------------------------------------|
| Excessive housing supply | I |
| Highway issues | II |
| Poor Design & Layout | IIIIIIII |
| Overly intrusive in the street scene | IIIIIIII |
| Cause harm to conservation area | IIIII |
| Disturbance neighbours | II |
| Light pollution | I |
| Cramped / over development | IIII |

9.25 A further element of supply and demand is viability which could have a direct impact in attracting volume housebuilders to the area. Analysis of the housing trajectory schedule shows that aside from the BC building out its own sites there are only Hopkins Homes currently building a site out at Hunstanton (166 dwellings) and Persimmon Homes finishing off a relatively modest site in Terrington St. Clement. In terms of sites with permission or an application submitted that haven't yet started Hopkins Homes have submitted an application for the northern portion of the West Winch Growth Area for 1,100 homes, Bennett Homes have a permission to build out one of the Local Plan allocations at Hunstanton for 120 new homes, and Larkfleet have permission for 450 homes for another of the Local Plan allocations.

9.26 The BC adopted a Community Infrastructure Levy (CIL) in 2017; this provides an indicator to land values and viability. The charging schedule shows that the northern and eastern parts of the borough are subject to £60 m², and the southern and western parts are subject to a £40 m². The unparished area of King's Lynn is £0 per m². A number of strategic sites within the Local Plan are also £0 m².

9.27 This will be investigated further through the Local Plan review whole plan viability study and through the Norfolk Strategic Planning Framework (NSPF) who have published a report on strategic housing delivery and aim to explore this issue in greater detail. Local planning authorities, county councils and public bodies have a legal responsibility to work together on strategic matters when preparing Local Plans. This is called the Duty to Cooperate. The NSPF provides a structure for tackling these planning issues across the county, especially those which have a strategic impact across local authority boundaries. The NSPF is produced in partnership between all the planning authorities in Norfolk. Further information on this can be found via the link below:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

Housing Supply & Delivery Analysis Conclusion

9.28 Listed below are considered to be the main conclusions from the detailed analysis:

- The number of planning permissions far outstrips the number of completions
- A balanced range of sites have come forward previously, be they major minor, from allocations or windfall, brownfield or greenfield
- There are a large number of sites with planning permission which appear not to be coming forward. Many of these are in the control of land owners.
- There are relatively few volume house builder active within the Borough
- Although there appear to be an abundance of smaller (minor) sites which have previously come forward

10. Housing Delivery Test Action Plan: Actions

- 10.1 Listed below are the Actions which have been identified by the Borough Council in order to attempt to increase housing supply and delivery. These are categorised in timescales of when each could be achieved. They have been identified based upon the Borough Council's ongoing activities and the analysis of the housing completions and permission data available.
- 10.2 The Borough Council realises that if it is to meet the tests set by Government, then we need to play to our strengths. Which based upon the analysis of housing delivery and supply are direct delivery through the Borough Council's actions on land it owns and active intervention on other sites. It also means creating a policy framework which enables opportunities for small scale windfall sites to continue to come forward at sustainable locations and in a sensitive manner, supporting local people and local small and medium businesses. It is further thought that other approaches to traditional models of development need to be considered such as Custom & Self-Build, we have seen that some sites have been delivered that otherwise may not have been in such a timely manner.
- 10.3 Actions will be monitoring through the Borough Councils Authority Monitoring Report and if required future Housing Delivery Test Action Plans.

Actions

Ongoing:

- Build out of Borough Council sites which are allocated, have planning permission or funding
- Continue to proactively work towards bringing forward the West Winch Growth Area
- Implement the Actions set out in the Borough Council Custom and Self-Build Action Plan, including providing opportunities for and raising awareness of this method of delivery
- Consider reducing the time given to planning permissions in light of the Housing Delivery Test result and future five year housing land supply positions
- Take decisions according to Local Plan and NPPF to provide clarity, certainty and consistency
- Continue to provide support for those communities wishing to prepare a Neighbourhood Plan for their area and if appropriate support neighbourhood plan allocations
- Member Training
- Proactively monitor permissions and completions

Short term (1 -2 Years):

- Local Plan review. Prepare this in a timely fashion and provide the opportunity for a balanced portfolio of sites in terms of size, location and Greenfield / brownfield.
- Produce a new Strategic Housing Marketing Assessment (SHMA)
- Produce a new whole Local Plan viability study
- Norfolk Strategic Planning Framework - continue to support this and the strategic housing delivery study
- Local Plan Task Group to consider sites which appear to have stalled (rated red)
- Borough Council to consider another phase of Rural Exception Sites (affordable housing)
- Borough Council to carry out its functions with regard to its established housing company and seek to provide further housing within the Borough
- Borough Council to carry out its functions as a Registered Provider and consider directly provide affordable housing
- Review the Housing Delivery Test Action Plan

Medium term (2 – 5 years):

- Borough Council to consider delivering more homes – both on own land and consider other options
- Work across the County with other authorities, as part of the Norfolk Strategic Planning Framework and through any follow up work that arises from the NSPF Housing Delivery Study

Long term (5 years +):

- Once the Local Plan review has been adopted commence work on a new Local Plan