

1. **Housing Delivery Test Action Plan Report** (Pages 2 – 7)
2. **Housing Delivery Test Action Plan 2024** (Pages 8 – 55)

CABINET MEMBERS DELEGATED DECISION

Open/Exempt		Would any decisions proposed:			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide Need to be recommendations to Council		YES/NO	
	Discretionary/			YES/NO	
	Operational	Is it a Key Decision		YES/NO	
Lead Member: Cllr Jim Moriarty E-mail: cllr.James.Moriarty@West-Norfolk.gov.uk			Other Cabinet Members consulted:		
			Other Members consulted:		
Lead Officer: Alex Fradley (Planning Policy Manager) E-mail: alex.fradley@west-norfolk.gov.uk			Other Officers consulted: Stuart Ashworth (Assistant Director – Planning & Environment); Jemma Curtis (Regeneration Programmes Manager); James Grant (Principal Project Manager); Karl Patterson (Senior Housing Development Officer); Clare Cobley (Housing Development Officer); Claire Dorgan (Senior Planner/ EWG representative); Lee Osler (Office Manager)		
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO If YES: Pre-screening	Risk Management Implications YES/NO	Environmental Considerations YES/NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					
Date of publication of report: 13 November 2024			Date decision to be taken: 20 November 2024		
Deadline for Call-In: 27 November 2024					

TITLE: APPROVAL OF HOUSING DELIVERY TEST ACTION PLAN 2024

Summary

This report has been prepared to secure approval of the 2024 Housing Delivery Test (HDT) Action Plan. The HDT Action Plan has been prepared in response to the Government's published 2022 HDT data (December 2023), which has identified the Borough Council as having achieved 90%, below the 95% requirement (thereby triggering the need to prepare an HDT Action Plan).

Recommendation

The Cabinet Member for Planning and Licensing to approve, under delegated powers, the 2024 HDT Action Plan.

Reason for Decision

To approve and permit publication of the Borough Council's 2024 HDT Action Plan, prepared in response to the Government's 2022 HDT data (published December 2023).



1 Background

The National Planning Policy Framework (NPPF), sets out the requirement for Local Planning Authorities (LPAs) to prepare a Housing Delivery Test (HDT) Action Plan, where housing delivery falls below 95% of the LPAs housing requirement over the previous three financial years.

The Ministry of Housing, Communities and Local Government (MHCLG) publishes annual data returns for the HDT, setting out the performance of each LPA. The most recent publication of results was published in December 2023 and covers the period 2019-2022 ([Housing Delivery Test: 2022 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement)). This sets out that the Borough Council's HDT result is 90%. This triggers the requirement for the Borough Council to prepare a HDT Action Plan.

The Borough Council previously published an HDT Action Plan in August 2019. This was followed by a partial update in 2020: [5-year housing land supply and Housing Delivery Test \(HDT\) | 5-year housing land supply and Housing Delivery Test \(HDT\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](https://www.west-norfolk.gov.uk/news/5-year-housing-land-supply-and-housing-delivery-test-hdt-5-year-housing-land-supply-and-housing-delivery-test-hdt-borough-council-of-king-s-lynn-west-norfolk). The Borough Council has reviewed these earlier HDT Action Plans in light of the latest available evidence.

The following Departments have been engaged in the preparation of the Action Plan:

- Housing Services (Strategic Housing)
- Regeneration (Economic Development)
- Major Housing Projects (Borough Council's own housing developments)

2 Options Considered

None. Preparation of an HDT Action Plan is required by Government, where housing delivery falls below 95% of the Borough's housing requirement over the previous three years.

3 Policy Implications

Preparation of the HDT Action Plan is required, to demonstrate what the Borough Council is already doing, together with further actions, to bolster housing delivery to meet local housing needs.

4 Financial Implications

None.

5 Personnel Implications

None.

6 Environmental Implications

National planning policy recognises that sustainable development consists of economic, social and environmental objectives. The latter objective requires development "to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy" (NPPF, paragraph 8, December 2023). These national policy



requirements are reflected in the Corporate Strategy 2023-2027, which includes a priority to “protect our environment”.

The HDT Action Plan sets out what the Borough Council is already doing, and could consider doing, to boost housing delivery. It is necessary to ensure that, in seeking to increase housing delivery, the Council maintains its commitments, both to promote beneficial growth and prosperity, while protecting the environment.

7 Statutory Considerations

None. Preparation of the HDT Action Plan is a requirement of national planning policy, although not a statutory requirement.

8 Equality Impact Assessment (EIA)

Pre-Screening Equality Impact Assessment undertaken, demonstrating neutral impacts. Therefore, there is no requirement to undertake a full EIA.

9 Risk Management Implications

The HDT Action Plan has been a requirement of national planning policy since 2018, when the requirement to maintain at least 95% housing delivery against the local housing need for the previous three years (or Local Plan housing requirements, if adopted within the previous 5 years). Local housing need is calculated using the Government’s standard method, with the latest calculations set out in the Action Plan.

If the Borough Council fails to produce a robust HDT Action Plan, there is a risk that undesirable development proposals could be granted on appeal, in response to the Council’s failure to explain how it is working to boost housing supply. The Action Plan is therefore an important tool in resisting inappropriate development, through meeting the Government’s requirement for the Borough Council to prepare a Plan in the event that housing delivery falls below the 95% “pass” figure.

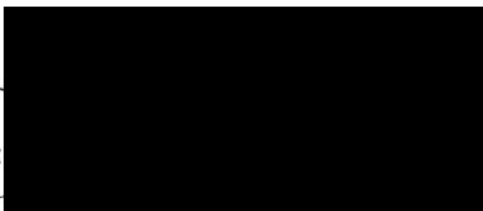
10 Declarations of Interest / Dispensations Granted

None.

11 Background Papers

2024 HDT Action Plan

Signed:



Cabinet Member for: Planning and Licensing

Date: 12/11/24



Stage 1 - Pre-Screening Equality Impact Assessment

Name of policy/service/function	Housing Delivery Test Action Plan 2024				
Is this a new or existing policy/service/function? <i>(tick as appropriate)</i>	New		Existing	X	
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.	<p>Since 2018, the Ministry of Housing, Communities and Local Government (MHCLG) has required local authorities to prepare a Housing Delivery Test (HDT) Action Plan, where delivery falls below 95% of the housing requirement over the previous three years.</p> <p>This requirement is set out in the updated National Planning Policy Framework (NPPF), December 2023.</p>				
Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i>	<p>The following Departments (internal consultees) have been engaged in the preparation of the Action Plan:</p> <ul style="list-style-type: none"> • Housing Services (Strategic Housing) • Regeneration (Economic Development) • Project Management 				
Question	Answer				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p> <p><i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i></p>		Positive	Negative	Neutral	Unsure
	Age			X	
	Disability			X	
	Sex			X	
	Gender Re-assignment			X	
	Marriage/civil partnership			X	
	Pregnancy & maternity			X	
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Armed forces community			X	
	Care leavers			X	
Other (eg low income, caring responsibilities)			X		



Question	Answer	Comments		
<p>2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?</p>	<p>Yes / No</p>	<p>Preparation of the HDT Action Plan is a requirement of national planning policy (NPPF). Its role is positive planning, to identify and explain potential actions that the Borough Council could take to bolster housing delivery, to support the Government's objective of significantly boosting the supply of homes (NPPF, paragraph 60, December 2023).</p>		
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	<p>Yes-/ No</p>	<p>The need to ensure delivery of sufficient housing to meet local needs is potentially of benefit to all communities/ groups</p>		
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	<p>Yes-/ No</p>	<p>The HDT Action Plan specifically relates to boosting housing delivery. This is a high level monitoring document. Changes to Council policy on affordable housing for example, would be considered and assessed in its own right.</p>		
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	<p>Yes-/ No</p>	<p>Actions:</p> <p>None required. However, the reporting within the document may lead to/ be addressed through other Council policies which will be subject to their own EIA.</p>		
		<p>Actions agreed by EWG member:</p> <p>.....Claire Dorgan.....</p>		
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>Decision agreed by EWG member:</p>				
<p>Assessment completed by:</p> <p>Name</p>	<p>Michael Burton</p>			
<p>Job title</p>	<p>Principal Planner (Planning Policy)</p>			
<p>Date completed</p>	<p>24 September 2024</p>			
<p>Reviewed by EWG member</p>	<p>Claire Dorgan</p>	<table border="1"> <tr> <td data-bbox="1110 1951 1254 2018">Date</td> <td data-bbox="1257 1951 1492 2018">09.10.2024</td> </tr> </table>	Date	09.10.2024
Date	09.10.2024			

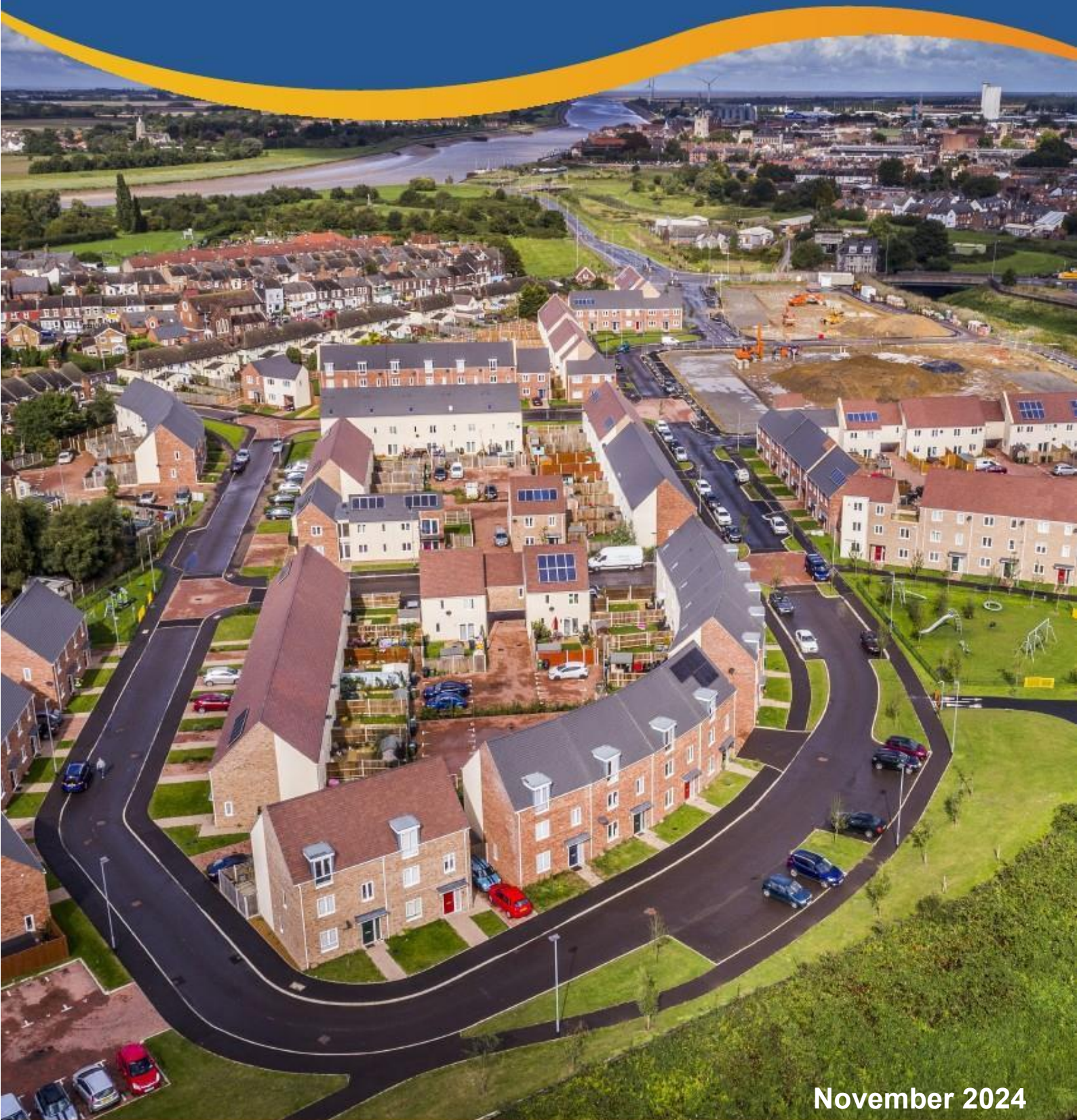


Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)

Borough Council of King's Lynn and West Norfolk

Housing Delivery Test Action Plan 2024

Borough Council of
King's Lynn &
West Norfolk



November 2024

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1. Introduction and Aims

- 1.1 This Housing Delivery Test Action Plan provides an overview of housing supply and delivery within the borough. It has been prepared in response to the National Planning Policy Framework (NPPF), which sets out a requirement for local planning authorities to prepare a Housing Delivery Test (HDT) Action Plan where housing delivery has fallen below 95% of the requirement over the previous three years (NPPF para 79, December 2023).
- 1.2 The Government is currently reviewing the HDT requirements, as part of a wider review of the NPPF, with anticipated adoption of an updated NPPF in late 2024/early 2025¹. Meanwhile, this HDT Action Plan has been prepared in accordance with the requirements of the current version of the NPPF (December 2023).
- 1.3 The Action Plan includes:
- Current national and local contexts;
 - Setting out current housing land supply position through the latest (April 2024) housing trajectory²;
 - Exploring past housing delivery trends in King’s Lynn and West Norfolk;
 - Detailing the proactive measures the Borough Council is currently taking to support housing delivery;
 - Analysis of the housing supply and delivery;
 - Establishing a series of appropriate actions aimed at increasing both housing supply and housing delivery, based on the above analysis and evidence.
- 1.4 The Action Plan is intended to be a live document that will be monitored through our Authority Monitoring Report (AMR). There is an aim to update the Action Plan annually following the publication of Housing Delivery Test (HDT) results by Government (anticipated November each year), if required.
- 1.5 Given the wealth of 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. The BC has long been proactive in housing delivery, notably entering into a “Major Housing Programme” in 2015, in partnership with private developers to bring forward strategic housing sites in King’s Lynn and Hunstanton.
- 1.6 It should be noted that this Action Plan has been prepared with a 1 April 2024 base date, using available data for the 2020/21, 2021/22, 2022/23 and 2023/24 monitoring years.

¹ https://assets.publishing.service.gov.uk/media/66acffdce1fd0da7b593274/NPPF_with_footnotes.pdf

² https://www.west-norfolk.gov.uk/download/downloads/id/8802/f121 - 2023-2024_trajectory_data.xlsx

- 1.7 The Plan will be reviewed following publication of the Government's next HDT dataset (anticipated November 2024) and the Borough Council's 2024-2025 monitoring data (spring/ summer 2025).

2. National Context

- 2.1 For Local Planning Authorities (LPAs) to use their Local Plan effectively, the Plan must be up to date. Those LPAs with an up-to-date adopted local plan, as per the current NPPF (December 2023), are not required to demonstrate a 5-year housing land supply position. Those LPAs at an advanced stage in their local plan preparation and which allocate sites that contribute towards meeting the Local Housing Need (LHN) and include a policies map until December 2025 need to demonstrate 4 years' worth of housing land supply against the 5-year requirement. It should be noted that these current protections are proposed for removal via the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation (2024). Therefore, we have chosen to show our 5 year-housing land supply position against a 5-year requirement.
- 2.2 In addition to demonstrating sufficient housing land supply, LPAs must also pass the Housing Delivery Test (HDT). The former is forward looking, while the latter relates to looking back, at recent housing delivery against the LHN.
- 2.3 At a minimum, the Local Plan must meet the LPAs housing need over the plan period. The LPA should also maintain an adequate supply of housing land, throughout. This is set out in some detail within the NPPF, Planning Practice Guidance (PPG)³, and associated supporting guidance (such as the HDT rule book⁴).
- 2.4 Housing delivery is something which it should be noted is often not within the LPA's control.
- 2.5 The Government's latest (2022) housing delivery test measurement was published in December 2023⁵.

³ <https://www.gov.uk/guidance/housing-supply-and-delivery>

⁴ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

⁵ <https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement>

3. Local Context: Current Local Plan and Emerging replacement Local Plan

Adopted Local Plan (2001-2026)

- 3.1 The Borough Council's Local Plan currently comprises the Core Strategy (CS), adopted in 2011, and the Site Allocations and Development Management Policies Plan (SADMP), adopted 2016. This covers the period 2001-2026 (25 years).
- 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 Part 1 of the Local Plan. It is the main document setting out the long-term strategy, including the vision and objectives for the Borough, and the broad strategy that will steer and shape new development; i.e. what development should go where, and when.
- 3.3 The SADMP is Part 2 of the Local Plan. This complements and gives effect to the strategic direction given by the CS. This is achieved through the provision of allocations for different land uses, including housing, to meet the aspirations and framework provided by the CS. It also provides a series of detailed development management policies which help in guiding development.
- 3.4 As stated in the NPPF, planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Therefore, the current Local Plan (CS and SADMP) remains the starting point for decision making, until the replacement Local Plan is adopted.

Replacement Local Plan (2021-2040)

- 3.5 The Borough Council started work on a Local Plan review in autumn 2016. This review, which developed into a comprehensive replacement for the current Plan, was submitted to the Secretary of State for independent examination in March 2022.
- 3.6 The Local Plan examination is now at an advanced stage, with hearings having concluded by September 2024 and consultation upon Main Modifications now under way (August – October 2024⁶). The replacement Local Plan will cover the period 2021-2040. It is currently anticipated to be adopted within the current financial year, by spring 2025 (Local Development Scheme, April 2024⁷).
- 3.7 The emerging Local Plan has undergone several amendments to housing figures during the examination process and now utilises the approach as set out in the standard method for calculating Local Housing Need (LHN) as of the start of this financial year.

⁶ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/951/local_plan_review_2016-2036_examination

⁷ https://www.west-norfolk.gov.uk/info/20214/emerging_local_plan_review/500/local_development_scheme

4. Local Housing Need

- 4.1 The Standard Method for calculating Local Housing Need (LHN), as per the NPPF and PPG, has been used to calculate the LHN for the Local Plan. As of March 2024 (1 April 2024 base date), this provides a figure of 554 new homes per year. The LHN calculation is set out in Figure 1 (below):

Figure 1: Local Housing Need (LHN)

Step 1: Setting the baseline

2014 – Based Household Projections in England. Table 406:

2024	2034	Growth
68,608	72,899	4,291

$$4,291 / 10 = 429.1$$

Step 2: An adjustment to take account of affordability

2022 Median Work Based Affordability Ratio Table 5c:

$$2022 = 8.64$$

Adjustment Factor

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

$$= (8.64 - 4 / 4) \times 0.25 = 0.29$$

Minimum annual local housing need figure

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

$$= (1 + 0.29) \times 429.1$$

$$= (553.539) \underline{\underline{554}}$$

Step 3: Capping the level of any increase

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10 year period identified in step 1; or
 - b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).
- The average annual housing requirement figure in the existing relevant policies (Core Strategy 2011) is 660 a year
 - Average annual household growth over 10 years is 429.1 (as per step 1)

- The minimum annual local housing need figure is 554 (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:
- Cap = 660 + (40% x 660) = 660 + 264 = 924

The capped figure is greater than minimum annual housing need figure and therefore the minimum figure for this local authority is **554**.

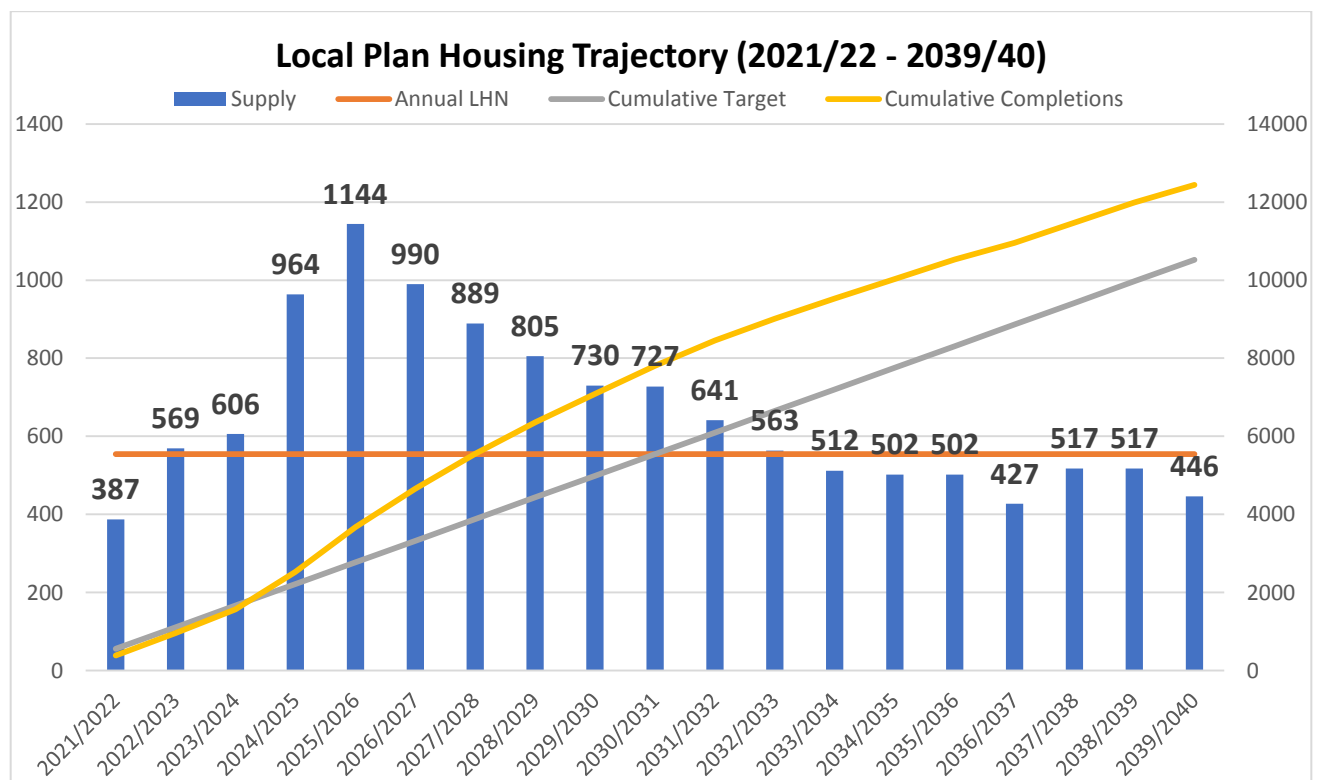
BCKLWN Local Housing Need (LHN) = 554

4.2 Over the 19-year Local Plan period (2021/22 to 2039/40) the LHN calculation requires 10,526 new homes. Completions data has already been recorded for the first three years (2021-2024), with 15 years of the plan period remaining (2025-2040), following adoption of the Local Plan (anticipated March 2025).

5. Housing Trajectory and Five-Year Housing Land Supply

5.1 As part of the emerging Local Plan examination process a Housing Trajectory as of 31 March 2024 has been prepared. This utilises the latest LHN calculation (554 dwellings per year) and is provided below:

Figure 2: Housing Trajectory



5.2 **Table 1** (below) demonstrates that the LHN of 10,526 over the plan period can comfortably be met. Planning for almost an exact number to meet the need leaves little room for manoeuvre over the plan period should any site not come forward as originally envisaged. This takes into account the growth which is planned through site-specific allocations contained within the Local Plan and Neighbourhood Plans. It also considers the sites allocated by the previous Local Plan (Core Strategy 2011 & Site Allocations and Development Management Policies Plan 2016).

Table 1: Housing supply over new Local Plan period (2021-2040)

Housing Supply over 19 Year Plan Period (2021/22 – 2039/40)	No. of Dwellings
Completions Total	1,562
Completions (2021/22)	387
Completions (2022/23)	569
Completions (2023/24)	606
Commitments (from windfall sites / non-allocated sites)	1,946
1 to 4	709
5 to 9	312
10 Plus	925
Development Plan Allocations Total	5,849
Local Plan Allocations with Planning Permission	1,978
Local Plan Allocations without Planning Permission	3,066
Neighbourhood Plan Allocations with Planning Permission	78
Neighbourhood Plan Allocations without Planning Permission	75
Site Allocations and Development Management Policies Allocations with Planning Permission	652
Windfall Allowance	3,081
Total Supply	12,438
Housing Need (LHN 554 x 19 years)	10,526
Surplus of Housing Supply over the Housing Need	1,912

5.3 The windfall allowance which is considered as a part of the anticipated supply has been calculated on a basis consistent with NPPF & PPG. There is compelling evidence that this will provide a reliable source of supply. The allowance is realistic and has regard to Housing and Economic Land Availability Assessment (HELAA) sites submitted for consideration and assessed as part of the Local Plan evidence base, historic windfall delivery rates, and expected future trends. Indeed, the windfall allowance will need to be further reduced from a mean average of 412 dwellings per year, to ensure that this remains robust and sustainable.

- 5.4 The average annual housing completions from windfall sites is 412. This is based upon the last 23 years' worth of data (2001/2002 - 2023/2024). This time period has been selected as it coincides with the start of the previous plan period and ends with the last complete financial year. It also takes into account changes in the housing market over time, including different economic climates. In addition, it is a similar time period to that of the current Local Plan. Recognising that land is a finite resource this figure is discounted by 25% to give a windfall allowance of 309 dwellings per year.
- 5.5 This is applicable for 13 years of the Local Plan period, allowing 3 years from now (2024/25) for such developments to come forward and contribute to the housing supply. $309 \text{ (annual allowance)} \times 13 \text{ (years)} = 4,017$.
- 5.6 However, the settlement capacity sense check which includes taking account of the HELAA sites submitted capacity, indicates that for the three main urban areas (King's Lynn, Downham Market, and Hunstanton), as well as North Wootton, South Wootton, and West Winch, that 938 dwellings are unlikely to be accommodated. This number of dwellings is therefore deducted from the total. $4,017 - 938 = 3,079$.
- 5.7 The total of 3,079 is then divided by the number of years the windfall allowance is applicable for (13). $3,079 / 13 = 236.8$ (237, rounded to the nearest whole unit).
- 5.8 The final windfall allowance for the housing trajectory and land supply calculations is 237 dwellings per year (from 2027/28 onwards). In total this is a figure of $237 \times 13 = 3,081$.
- 5.9 The summary Housing Trajectory Schedule is available to view below (Figure 3). The full trajectory and schedule can be viewed and via the following link:
https://www.west-norfolk.gov.uk/download/downloads/id/8802/f121_-_2023-2024_trajectory_data.xlsx

Figure 3: Summary Housing Trajectory and Schedule

Housing Trajectory Schedule Summary																			
Housing Trajectory	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032	2032/2033	2033/2034	2034/2035	2035/2036	2036/2037	2037/2038	2038/2039	2039/2040
1 to 4	137	166	113	343	184	141	29	12	0	0	0	0	0	0	0	0	0	0	0
5 to 9	48	70	72	62	73	60	63	54	0	0	0	0	0	0	0	0	0	0	0
10 Plus	69	159	128	262	255	147	121	80	30	30	0	0	0	0	0	0	0	0	0
Windfall Allowance							237	237	237	237	237	237	237	237	237	237	237	237	237
LP Allocation With Planning Permission	0	0	180	278	540	423	187	175	144	106	50	50	25	0	0	0	0	0	0
LP Allocation Without Planning Permission	0	0	0	0	28	138	165	179	272	297	297	220	200	225	225	150	240	240	190
NDP With Planning Permission	0	0	0	0	11	23	23	21	0	0	0	0	0	0	0	0	0	0	0
NDP Without Planning Permission	0	0	0	0	0	0	4	4	7	17	17	16	10	0	0	0	0	0	0
SADMP Allocation With Planning Permission	133	174	113	19	53	58	60	43	40	40	40	40	40	40	40	40	40	40	19
SADMP Allocation Without Planning Permission	0	0	0	0	0	0	0	0	0	10	10	10	10	0	0	0	0	0	0
TOTAL	387	569	606	964	1144	990	889	805	730	737	651	573	522	502	502	427	517	517	446
a) Annual LHN	554	554	554	554	554	554	554	554	554	554	554	554	554	554	554	554	554	554	554
b) Cumulative Target	554	1108	1662	2216	2770	3324	3878	4432	4986	5540	6094	6648	7202	7756	8310	8864	9418	9972	10526
c) Completions	387	569	606	964	1144	990	889	805	730	737	651	573	522	502	502	427	517	517	446
d) LP Allocation With Planning Permission	0	0	180	278	540	423	187	175	144	106	50	50	25	0	0	0	0	0	0
d1) LP Allocation Without Planning Permission	0	0	0	0	28	138	165	179	272	297	297	220	200	225	225	150	240	240	190
e) Planning Permissions	254	395	313	667	512	348	213	146	30	30	0	0	0	0	0	0	0	0	0
h) Windfall Allowance					298	298	298	298	298	298	298	298	298	298	298	298	298	298	298
i) Total Identified Housing Supply	387	569	606	964	1144	990	889	805	730	737	651	573	522	502	502	427	517	517	446
k) Cumulative Completions	387	956	1562	2526	3670	4660	5549	6354	7084	7821	8472	9045	9567	10069	10571	10998	11515	12032	12478
l) Cumulative Shortfall	167	152	100	-310	-900	-1336	-1671	-1922	-2098	-2281	-2378	-2397	-2365	-2313	-2261	-2134	-2097	-2060	-1952

- 5.10 Table 2, below, illustrates that the position as of 1 April 2024 for the identified Housing Land Supply for the five-year period from 2024/25 to 2028/29 is 4,635 dwellings. This comprises the various sources of housing listed, it includes two years' worth of the windfall allowance, enabling a 3-year period for housing from this source to come forward and make this contribution.
- 5.11 A 7% discount/ lapse rate is also applied to windfall sites. This recognises that some homes from this source might not come forward as originally envisaged. The rate is based upon the fact that over a recent 5-year period (2018/19 – 2022/23) 2,326 dwellings were granted planning permission on windfall sites, and in this same timeframe 166 dwellings which had planning permission have lapsed. This is calculated as follows: $166 / 2,326 \times 100 = 7\%$.
- 5.12 A similar rate has not been applied to the Development Plan Site-Specific Allocations (as shown in Table 2), as these have broadly been expressed as 'at least' and have in most cases come forward for planning permission and are being built-out for a higher number of homes than the original policies stated. There has also been a detailed examination of the progress of these sites, they have been categorised, and their future delivery predicted based on a combination of evidence from the site owner/ controller/ agent/ developer, and professional planning judgment.

Table 2: Identified Housing Land Supply (as of 1 April 2024)

5 Year Housing Supply Source (2024/25 – 2028/29)	No. of Dwellings	7% Discount / Lapse Rate
Windfall Sites		
10 Plus Totals	865	804
5 to 9 Totals	312	290
1 to 4 Totals	709	659
Windfall Sites Total	1,866	1,754
Development Plan Allocations		
Local Plan Allocations with Planning Permission	1,603	
Local Plan Allocations without Planning Permission	485	
Neighbourhood Plan Allocations with Planning Permission	78	
Neighbourhood Plan Allocations without Planning Permission	8	
Site Allocations and Development Management Policies Allocations with Planning Permission	233	
Site Allocations and Development Management Policies Allocations without Planning Permission	0	
Development Plan Allocations Total	2,407	
Windfall Allowance	474	
Total 5 Year Identified Supply (IDS)	4,635	

5.13 Table 2 represents the Borough Council’s position, following the 2023-24 monitoring period (1 April 2023 – 31 March 2024) as of 1 April 2024, as shown in the published trajectory (paragraph 5.9, above). It distinguishes between the following sources of supply:

- Windfall commitments (with 7% lapse rate discount);
- Draft Local Plan 2021-2040 allocations;
- Neighbourhood Plan allocations; and
- Current Local Plan (2016 SADMP) allocations.

5.14 It is also necessary to consider the scenario, at the point the replacement Local Plan is adopted (during the current monitoring year). At the point the new Plan is adopted, SADMP allocations that are not carried forward into the replacement Plan would cease to be allocations and any extant permissions for these sites would then need to be counted as windfalls (i.e. commitments that are not allocated in the current development plan). Under the methodology applied at Table 2 (above), windfalls are subject to the application of a 7% lapse rate. This would therefore have implications for SADMP sites with Planning Permission (233 dwellings), which need to be adjusted through application of the lapse rate. The revised calculations are set out at Table 3 (below).

Table 3: Identified Housing Land Supply (as shown in the replacement Local Plan 2021-2040)

5 Year Housing Supply Source (2024/25 – 2028/29)	No. of Dwellings	7% Discount / Lapse Rate
Commitments on 1 April 2024 (excluding Local Plan allocations)		
Windfall sites of 10 dwellings or more	1,092	1,016
Windfall sites of 5 to 9 dwellings	318	296
Windfall sites of 1 to 4 dwellings	709	659
Windfall Commitments Total	2,119	1,971
Neighbourhood Plan allocations with planning permission		78
Total Commitments (excluding Local Plan allocations)		2,049
Local Plan Allocations		
Local Plan allocations with planning permission		1,603
Local Plan allocations without planning permission		485
Local Plan Allocations Total		2,088
Neighbourhood Plan allocations without Planning Permission		8
Windfall Allowance		474
Total 5 Year Identified Supply (IDS)		4,619

- 5.15 Table 3 represents the housing land supply position, when the replacement Plan is adopted. Application of the lapse rate to SADMP sites which would become windfall represents a reduction of 16 dwellings to the Identified Supply (IDS), reducing the deliverable supply to 4,619.
- 5.16 The Table 3 scenario (i.e. a marginally lower supply figure, as explained in paragraph 5.15, above) has been applied in calculating the 5-year housing land supply position, to ensure this corresponds to the replacement Local Plan which is expected to be adopted during the current monitoring period. Table 4 (below) sets out the 5-year housing land supply position, as of 1 April 2024, and which is proposed for inclusion in the new Local Plan 2021-2040 as a Main Modification.
- 5.17 Table 4 provides the 5-Year Housing Land Supply Calculation; this takes the total identified housing supply from Table 2 and demonstrates that the 5-Year Housing Land Supply Position for The Borough Council at the point of adoption (2024/25) is just below 8 years' worth. This is healthy position that significantly exceeds the required minimum 5 years' worth.

Table 4: 5 Year Housing Land Supply Calculation

Local Housing Need (LHN) (based on standard method)	554
LHN x 5 (Years)	2,770
LHN x 5 (Years) + 5% NPPF Buffer (to ensure choice and competition in the market for land)	2,909
Identified Housing Supply	4,619
Identified Housing Supply / LHN x 5 + 5% NPPF Buffer	1.59
Above x 5 (Years)	7.9

- 5.18 Distribution of Growth across the Borough, consistent with the Spatial Strategy and the Settlement Hierarchy, will be delivered via existing sites with planning permission, sites allocated in the Local Plan and Neighbourhood Plans (including sites with planning permission), and new planning permissions granted in accordance with the policies of the Local Plan, including windfall development.

6. The Housing Delivery Test and BCKLWN Results

- 6.1 The National Planning Policy Framework (NPPF 2023) sets out that where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following consequences should apply:
- where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;

- where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as part of their land supply calculations, in addition to the requirement for an action plan.
- where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in NPPF, in addition to the requirements for an action plan and a 20% buffer.

6.2 The Housing Delivery Test measurement rule book, available to view via the link below, provides the method for calculating the Housing Delivery Test result:

[Housing Delivery Test measurement rule book - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/118122/housing-delivery-test-measurement-rule-book-2019-2022.pdf)

6.3 Data on housing completions is collected annually (late summer/ early autumn) from LPAs, by Government. The sequence is that Government then publishes the HDT result in November each year for every LPA. This position is then ‘fixed’ until the next set of results are published the following year. Further details about the process and sequence for the HDT are set out in Figure 4 (below).

Figure 4: HDT thresholds (NPPF paragraph 79, December 2023)

Threshold	Outcome
95% +	Delivery over 95% of requirement, 2019-2022: HDT passed
85% - 95%	Delivery between 85% and 95% of requirement, 2019-2022: HDT Action Plan required
75% - 85%	Delivery between 75% and 85% of requirement: HDT Action Plan, plus 20% housing land supply buffer required
<75%	Delivery below 75% of requirement, 2019-2022: NPPF presumption in favour of sustainable development applies (paragraph 11)

6.4 The Housing Delivery Test Results 2022 were published on 19 December 2023. The Borough Council’s latest (2022) result is provided in the table below. This has been taken from the results published by MHCLG:

Table 3: Housing Delivery Test Results 2022

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
2019-2020	2020-2021	2021-2022	2019-2022	2019-2020	2020-2021	2021-2022	2019-2022		
508	358	547	1413	591	340	340	1271	90%	Action Plan

Source: [Housing Delivery Test: 2022 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/housing-delivery-test-2022-measurement)

- 6.5 The results show that there is a need for the BC to prepare a HDT Action Plan, with a 90% score, given that this falls just short of the 95% pass mark. This document has been prepared to fulfil this requirement.

7. Analysis of Housing Delivery and Performance

7.1 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-year housing land supply requirement, and that the Government’s published HDT result for 2022 is 90% for King’s Lynn and West Norfolk.

7.2 The 90% result falls below 96% recorded for 2021, which was reported to the Council on 14 October 2021⁸ and confirmed by the Government in January 2022⁹. The 90% result, although representing a reduction from the previous figure, is still an improvement on the figures that prompted the Council to prepare previous HDTs, in 2019 and 2020¹⁰. Notwithstanding, the current shortfall entails the preparation of an updated Action Plan. This section will consider the wider/ macro causes for the shortfall in delivery against housing need, going on to provide detailed analysis of data, including numbers of permissions; mix of sites (e.g. completions on major (10 dwellings or more/ minor (<10 dwellings) and completions on allocated sites, compared to windfalls); the Borough Council’s role in delivery and performance of the planning service.

Wider/ macro causes for shortfall

- 7.3 At a national level, several factors have impacted house building between 2020 and 2024. These include economic, political, social, and environmental influences, as

⁸ [democracy.west-norfolk.gov.uk/documents/g4865/Public reports pack 14th-Oct-2021 16.30 Council.pdf?T=10](https://democracy.west-norfolk.gov.uk/documents/g4865/Public%20reports%20pack%2014th-Oct-2021%2016.30%20Council.pdf?T=10)

⁹ [Housing Delivery Test: 2021 measurement - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/housing-delivery-test-2021-measurement)

¹⁰ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/housing_delivery_test_hdt_action_plan

well as challenges arising from the COVID-19 pandemic and ongoing shifts in housing policy. Here are some of the main factors:

- **COVID-19 Pandemic (2020–2022)** – The construction industry was significantly affected by the pandemic. The first lockdown (March – July 2020) required an effective embargo for onsite works. Although restrictions were eased thereafter, disruption to supply chains for construction materials and how sites operated (particularly during the second and third 2021-2022 lockdowns) significantly impacted housing delivery.
- **Economic factors** – Macro economic causes for reduced housing delivery have included increased costs (therefore demand) for materials during the pandemic, also worsened due to the impacts of Brexit on many supply chains. Subsequently, during 2022 the economic crisis (mortgage/ interest rates, cost of living) further dented affordability (therefore demand) for new homes. These challenges are also worsened by issues such as overarching skills shortages in all parts of the construction industry, together with increased costs.
- **Legislative changes** – Since 2020, different Governments have proposed significant measures to overhaul the planning system (e.g. Planning White Paper, August 2020). This culminated in the 2023 Levelling-Up and Regeneration Act, with ongoing uncertainty as to when the changes to the planning system put forward through this legislation will be implemented. Other changes affecting the housing market include phasing out “Help to Buy”. New standards (e.g. changes to the Building Regulations; Future Homes Standard, requiring net-zero carbon emissions from homes by 2025) inevitably have implications for housing delivery, both in terms of increased costs and skills availability.

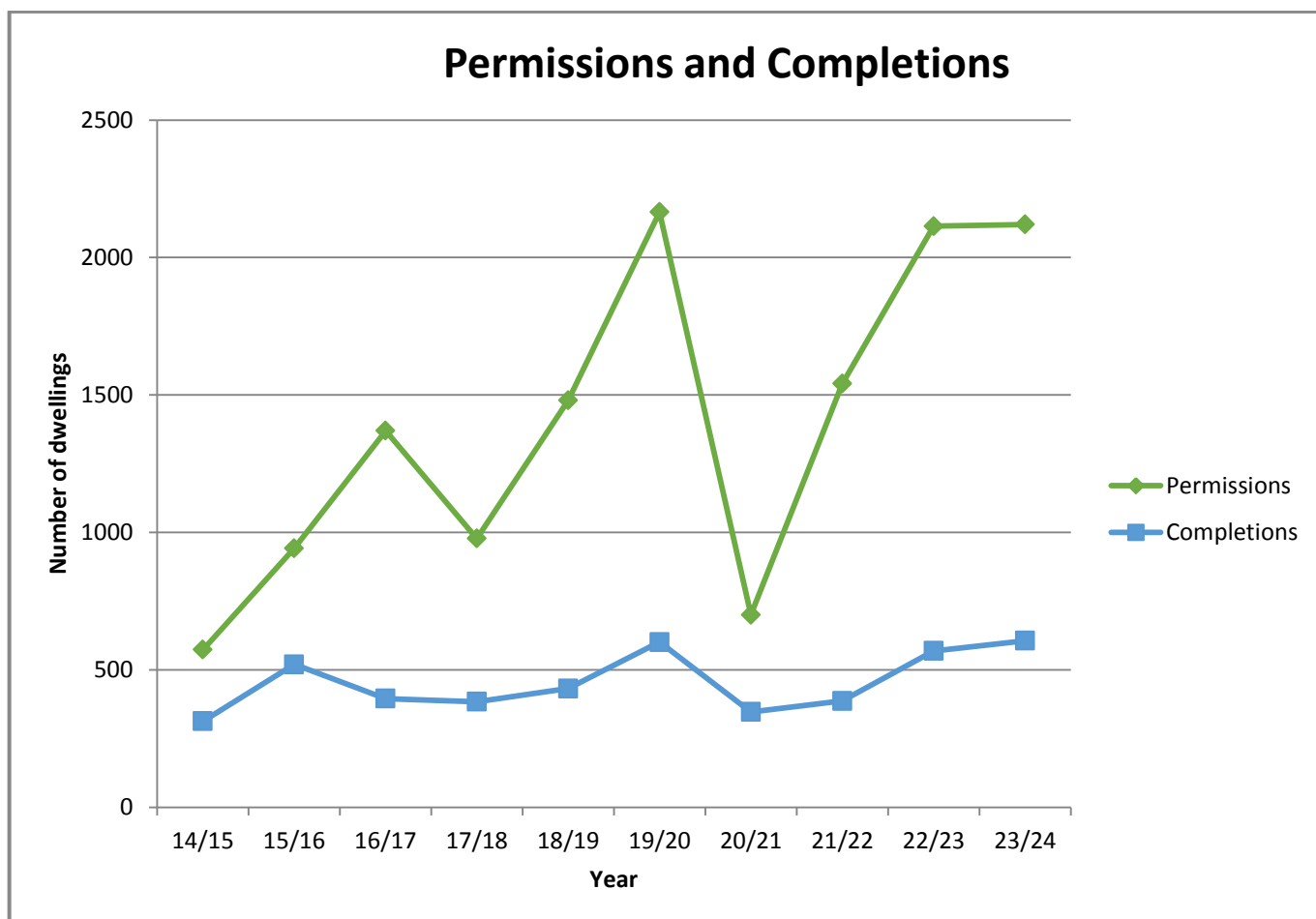
7.4 In summary, at a national level, between 2020 and 2024 housebuilding was impacted by a mix of pandemic-related disruptions, economic factors like inflation and high interest rates, labour shortages, changes in government policies, and increasing pressure for sustainable building practices. These combined factors created challenges for developers and the housing market overall, while also shaping the future trajectory of housing supply in the country.

Quantitative analysis of housing completions and permissions (performance) data

7.5 To understand the implications of national and regional economic issues affecting housing delivery (much of which is beyond the control of the Borough Council), it is necessary to provide detailed analysis of performance at the Borough-level. This is critical in understanding potential actions to address current delivery shortfalls.

7.6 Figure 5 (below/ overleaf) shows the number of permissions granted over the past five years against the number of completions on a yearly basis:

Figure 5: Permissions vs Completions

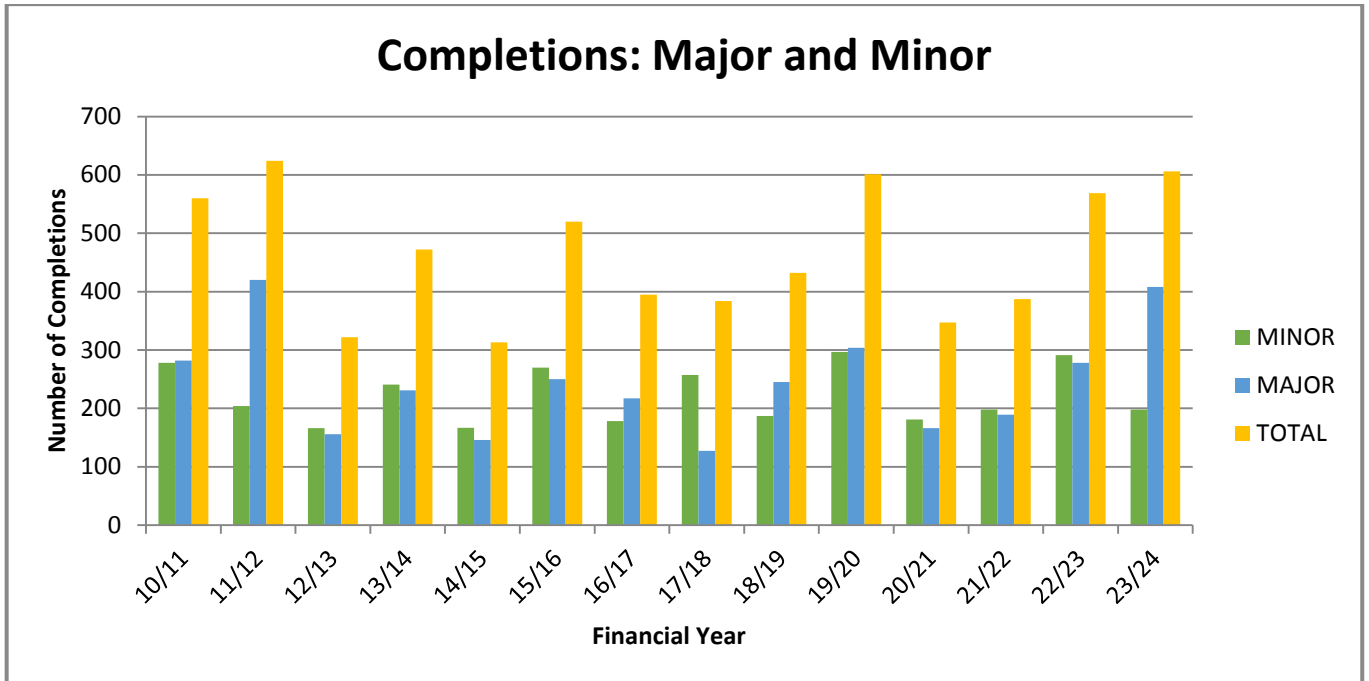


7.7 Figure 5 shows the gap between permissions and completions. Overall, in the past ten years there have been 13,983 new homes which have been granted planning permission and 4,554 new homes have been completed. This is a gap of 9,429 homes; i.e. 3 times as many permissions have been granted as completions over the previous decade.

7.8 As of 1 April 2024, there were extant planning permission for 3,804 new homes in the borough, of which 2,045 have not commenced. Of the latter, 128 (6%) have outline planning permission and 1,917 (94%) have either a full or reserved matters planning permission in place. This shows there is a relatively large stock of full permissions which could be implemented, but either have not, as yet, because they have not had enough time to do so or the controller of the site is not moving the site forward as quickly as they might be able to. The large percentage of full planning permissions indicates a robust and deliverable housing land supply.

7.9 Looking at completions to date since 2011 (Core Strategy adoption date) should give a clear indication of how many dwellings are on major sites (10+ dwellings) and how many are on minor sites (less than 10 dwellings). This is illustrated by Figure 6, below:

Figure 6: Historic Housing Completions minor vs major



7.10 Overall, 1,562 homes have completed since the start of the replacement Local Plan period (1 April 2021), with 4,970 during the previous decade (2011-2021). Over the previous 13 years, 3,113 (48%) homes are from minor sites (1-9 dwellings), and 3,419 (52%) homes are from major sites (10 or more dwellings). This highlights that there is a balanced level of completions coming forward from large and small sites.

Mix of Sites

7.11 Based on the Housing Trajectory it is evident that a variety of site sizes are coming forward, benefit from planning permission, are being built out and have been completed in recent times. This is considered to represent a healthy position as it shows that a range of house builders are actively operating and developing in the Borough. This includes, custom and self-builders, small and medium builders, regional and national house builders.

7.12 The previous HDT Action Plan was concerned that this mix of sites was not as healthy as it is today. In particular, there could be issues with attracting volume housebuilders to the area. Historically there has been a regular supply of smaller sites, but a positive factor in the delivery of medium to large sites seen coming forward today is likely due to the adoption of the SADMP in 2016 and the sites of this nature it allocated being delivered.

7.13 The following larger house builders have recently completed developments or are onsite developing today:

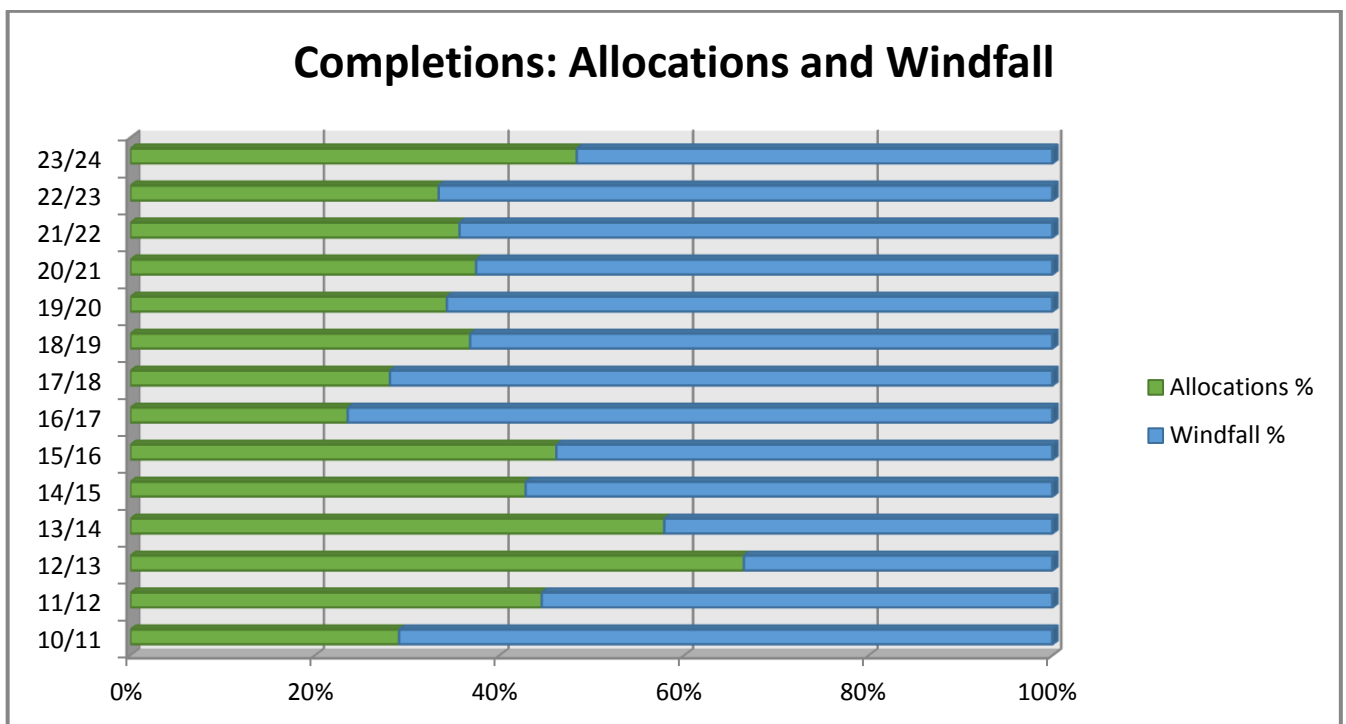
- Allison Homes
- Bennett Homes

- David Wilson Homes
- Hopkins Homes
- Permission Homes

7.14 In addition to this, the Borough Council has and is leading delivery of a number of medium to large sites at King’s Lynn and Hunstanton, including current Local Plan (SADMP) allocations.

7.15 Another key factor is assessing the contribution of housing completions from sites allocated with the Local Plan (2016 SADMP: planned growth) and those from windfall sites (not specifically allocated within the Local Plan). This is illustrated by Figure 7, below:

Figure 7: Completions, Allocations Vs Windfall

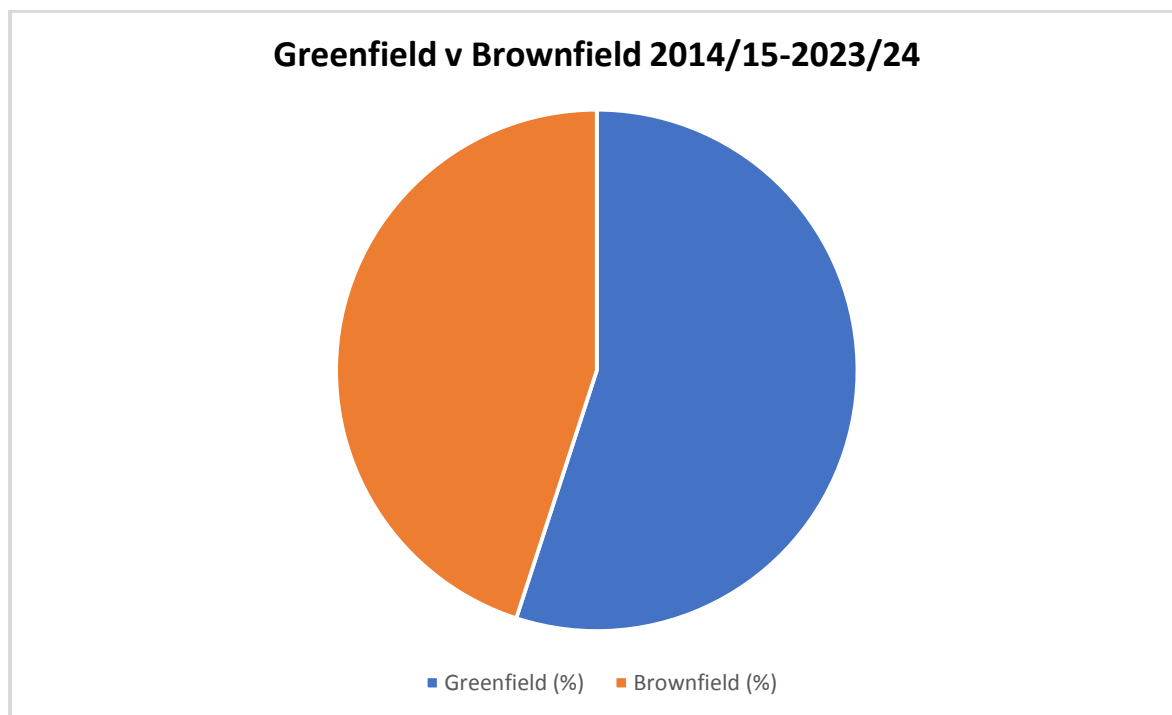


7.16 Figure 7 shows that there are significant contributions from both allocations and windfall sites, since 2010/11. The overall % of each is 40% from allocations and 60% from windfall. Clearly completions from windfall sites have, and will continue to, make a significant contribution.

7.17 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 that this trend will continue. The emerging Local Plan 2021-2040 seeks to create opportunities for sustainable windfall sites to continue to come forward, through a New Policy, proposed as a Main Modification to the submission Plan (August 2024).

7.18 In analysing the housing completions, it is important to recognise if the homes are coming forward on Greenfield or Brownfield (previously developed land). Figure 8 (below) looks at the completions over the previous decade:

Figure 8: Greenfield Vs Brownfield land completions



7.19 Figure 8 shows that there is a balance between greenfield and previously developed sites. This is interesting given the rural nature of the borough, the size and that there are only three towns. The BC does publish and maintain a brownfield register, currently this shows there are a large number of sites that are brownfield/ previously developed land which are already either allocated in the Local Plan or have 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).

Analysing site deliverability

7.20 The emerging Local Plan examination (since March 2022) has included detailed analysis of site deliverability, necessary to demonstrate achievability of the Plan. This includes a systematic assessment of available site-specific information for Local Plan site allocations, which was published in September 2023¹¹. This was supplemented by further information gathered through direct engagement with site promoters and/ or landowners, for the March and April 2024 examination hearings¹².

¹¹ https://www.west-norfolk.gov.uk/download/downloads/id/8019/f50b_appendix_b_updated_deliverability_and_developability_document.pdf

¹² https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/882/examination_library_index

7.21 The detailed site-specific information gathered through this process, also informed the published April 2024 Housing Trajectory.

Role of the Borough Council in site delivery

7.22 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 Government's 'Improving planning performance' (2022) document¹³ sections 8 & 9; the assessment for performance is stated below:

- the speed with which applications are dealt with measured by the proportion of applications that are dealt with within the statutory time or an agreed extended period; and
- the quality of decisions made by local planning authorities measured by the proportion of decisions on applications that are subsequently overturned at appeal.

7.23 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.

7.24 The 'Improving Planning Performance – Criteria for Designation' document was first published by the Government in 2013 and subject to regular updates, the most recent version being published in October 2022. This sets four separate performance criteria against which local planning authorities will be assessed:

1. The speed of determining applications for major development;
2. The quality of decisions made by the authority on applications for major development;
3. The speed of determining applications for non-major development; and
4. The quality of decisions made by the authority on applications for non-major development.

7.25 'Improving Planning Performance' explains the criteria where the Government (Ministry of Housing, Communities and Local Government), by way of intervention (designation), requires an LPAs to prepare an action plan addressing areas of weakness that it identifies as having contributed to its under-performance. These

¹³ <https://www.gov.uk/government/publications/improving-planning-performance-criteria-for-designation>

are set out in Table 5 (below), which also includes (for comparison) reference to the previous (2018) thresholds.

Table 5: Designation thresholds and assessment period overview

Speed			
Measure and type of Application	Threshold and assessment period October 2020 to September 2022	Threshold and assessment period October 2021 to September 2023	For comparison: Threshold (2018 Improving Planning Performance document)
Speed of major Development	60%	60%	60%
Speed of non-major Development	70%	70%	70%
Quality			
Measure and type of Application	Threshold and assessment period April 2020 to March 2022	Threshold and assessment period April 2021 to March 2023	For comparison: Threshold (2018 Improving Planning Performance document)
Quality of major Development (District and County)	10%	10%	10%
Quality of non-major Development	10%	10%	10%

7.26 The Borough Council's performance against these thresholds is regularly assessed. Table 6 (below) shows the 2021-2023 decision performance (%) statistics for King's Lynn & West Norfolk. Table 6 shows that, overall for major applications, the Council's performance is significantly above the national minimum threshold performance targets for major (60%) and non-major developments (70%); at above 87% for both. Similarly, for the measure of quality, the numbers of applications overturned at appeal is comfortably below the 10% threshold, even for major developments (5.8%).

Table 6: Designation thresholds and assessment period overview

Measure and type of Application	Threshold and assessment period October 2021 to September 2023	Total Decision Performance (%)
Speed of major Development	60%	87.4%
Speed of non-major Development	70%	87.3%
Quality of major Development	10%	5.8%
Quality of non-major Development	10%	0.8%

7.27 Table 7 provides further additional detail, with reference to quarterly performance. This shows decision performance figures for the 2021/22 – 2022/23 monitoring periods.

Table 7: Decision Performance (%)

2021/22	Q1	Q2	Q3	Q4	Full year
Major	100.0%	92.9%	87.5%	88.9%	93.0%
Minor	84.7%	86.4%	86.9%	86.7%	86.2%
Other	94.6%	92.0%	91.0%	91.0%	92.2%
2022/23	Q1	Q2	Q3	Q4	Full year
Major	90.9%	90.0%	87.5%	83.3%	87.8%
Minor	82.0%	89.3%	81.9%	78.5%	82.6%
Other	87.3%	94.2%	89.7%	87.0%	89.5%

7.28 Tables 6 and 7 (above) show that the planning department is performing well in terms of the Government measures and would appear overall, to be positive and proactive in granting planning permission for housing development where appropriate.

7.29 Tables 8-10 (which follow) examine how many of the applications that have been presented to the BC Planning Committee during the 2021-2023 monitoring years that have been refused contrary to officer recommendation for approval:

Table 8: Applications considered by Planning Committee

Total number of applications considered by Committee (April 2021 – March 2023)	Total number of decisions permitted	Total number of decisions refused contrary to officer recommendation
177	128	26
Percentage of total decisions made by Committee	72.3%	14.7%

Table 9: Applications refused by Planning Committee contrary to officer recommendation

Application ref	Refusal date	Main reason(s) for refusal	Appeal decision (if applicable)	Granted on appeal (Y/N)
20/01978/CU	15/04/2021	Cramped form/ over-development	03/03/2022	Y
20/01854/F	22/04/2021	Amenity/ design	10/12/2021	Y
19/01622/F	25/06/2021	Design/ parking	01/12/2022	Y
20/01136/F	16/07/2021	Spatial – unsuitable location	31/03/2022	Y
21/00081/F	19/07/2021	Amenity	n/a	n/a
20/01166/FM	20/07/2021	Design	n/a	n/a
20/01559/RM	15/09/2021	Amenity	n/a	n/a
21/00903/F	22/11/2021	Amenity	n/a	n/a
21/00457/F	10/12/2021	Scale/ over-development; AONB location	18/01/2023	Y
21/01173/F	10/12/2021	Amenity	02/09/2022	N
21/01956/F	14/01/2022	Spatial – unsuitable location; amenity	10/10/2022	Y
21/00589/RMM	21/01/2022	Design/ layout	09/12/2022	Y
21/01064/F	10/02/2022	Spatial – unsuitable location; amenity	Ongoing	n/a

Application ref	Refusal date	Main reason(s) for refusal	Appeal decision (if applicable)	Granted on appeal (Y/N)
21/01442/FM	25/02/2022	Loss of agricultural land	29/09/2023	Y
21/00943/F	08/04/2022	Design; AONB location	n/a	n/a
21/01411/F	08/04/2022	Cramped form/ over-development	n/a	n/a
21/01569/F	16/05/2022	Loss of tourist accommodation	n/a	n/a
22/00266/RM	24/06/2022	Amenity	09/10/2023	N
21/02418/O	24/06/2022	Amenity	07/03/2023	Y
21/01610/F	07/10/2022	Cramped form/ over-development	12/12/2023	Y
22/00704/FM	09/11/2022	Loss of agricultural land	23/08/2023	Y
22/00987/F	24/11/2022	Amenity/ design	24/01/2024	Y
22/00065/F	13/01/2023	Scale/ over-development; AONB location	n/a	n/a
22/01089/F	13/01/2023	Highway safety	n/a	n/a
22/02008/F	09/02/2023	Design	n/a	n/a
22/00536/F	14/03/2023	Loss of trees	28/03/2024	Y

Table 10: Outcome of applications refused by Planning Committee contrary to officer recommendation

Total No and % of applications refused by Planning Committee, contrary to officer recommendation	Total number of re-submissions permitted	Total number of re-submissions pending consideration	Total number of appeals	No further action
26	5	1	16	4
100%	19.2%	3.8%	61.5%	15.4%

7.30 The Committee is entirely within its rights to take decisions contrary to an officer recommendation. Indeed, Members' role is to scrutinise officer recommendations and consider these in an open-minded way in decision-making. Typically, where Members overturn officers' recommendations, this involves the Committee giving differing weight to one or more planning considerations than the case officer. Ultimately, the Borough Council takes its collective decision as to whether or not a proposal is acceptable in planning terms; i.e. whether it constitutes sustainable development. Reasons for refusal of new housing schemes may vary greatly, but typically these relate to:

- Highways safety
- Poor design and layout (e.g. cramped/ over-development)
- Impacts upon street scene/ public realm
- Harm to landscape/ heritage assets (e.g. conservation area, listed buildings, AONB/ National Landscape area)
- Amenity/ disturbance (e.g. to neighbouring properties or light pollution)

7.31 The overwhelming majority of refusal reasons relate to matters of development management, as reflected in the typical reasons cited above. Of course, if significant

numbers of applications are refused contrary to officer recommendation this may signify a wider dysfunction within a local authority.

Housing Supply and Delivery Analysis – Conclusions

7.32 Listed below are the main findings and conclusions from the analysis from within this section:

- The number of planning permissions far out strips the number of completions.
- A balanced range of sites have and are coming forward, be they major or minor, from allocations or windfall, brownfield or greenfield.
- The Borough Council is able to demonstrate a healthy 5-year housing land supply.
- A range of volume housebuilders continue to operate within the Borough.
- Housing land allocations from the current Local Plan continue to come forward.

7.33 Overall, the Borough Council continues to grant sufficient permissions to maintain a healthy housing land supply. This analysis also reveals an increasing divide, between numbers of permissions and completions, suggesting that the Borough Council should continue to seek opportunities to work in partnership to successfully deliver housing and placemaking.

8. BCKLWN Indicative Housing Delivery Test Results 2023 and 2024

8.1 The HDT results are anticipated to be published in November each year. They are based upon the previous 3 financial years. Publication of the most recent (2022) results was delayed by around a year, as the Government was consulting upon amendments to the 2021 NPPF at the time. The 2022 results were eventually published in December 2023, to coincide with publication of the updated NPPF. These cited completions data from the following financial years:

- April 2021 – March 2022;
- April 2020 – March 2021; and
- April 2019 – March 2020.

8.2 Data is now available for the 2022-2023 and 2023-2024 monitoring years, as two years have progressed since the latest published data. Updated calculations are set out below, which reflect the respective positions for the 2023 and 2024 datasets. Discrepancies were identified between the Government (MHCLG) and Borough Councils' housing completions data (Table 11, below). These could have significant implications for the Borough Council's 2023 and 2024 HDT results, with that for 2023 triggering the requirement for the HDT Action Plan, plus 20% housing land supply buffer. This could impact upon the Council's ability to resist inappropriate development through the need for a 20% buffer in the five-year housing land supply calculation.

Table 11: Discrepancies between MHCLG and Borough Councils' housing completions data and implications for future HDT results

	MHCLG completions data	Actual completions (Housing Trajectory)	Difference	HDT Published / Indicative Future Result	HDT Actual Result
21/22	340	387	+47	90%	93%
22/23	548	569	+21	83%	88%
23/24	653	606	-47	92%	93%

8.3 In October 2024, the MHCLG permitted the Borough Council to submit corrected completions data for the 2022-2023 and 2023-2024 monitoring years. These include:

- Addition of 21 dwellings for 2022-2023 monitoring year, increasing the completions figure from 548 (2023 Delta submission) to 569 (correct completions figure, as published in 2024 trajectory); and
- Addition of 47 dwellings to 2023-2024 monitoring data (carried forward from 2021-2022 monitoring year), increasing figure from 606 (correct completions figure, as published in 2024 trajectory) to 653 (2024 Delta submission).

8.4 On the basis of revised data (as indicated in Table 11, above), the 2022 HDT results could be amended, as shown in Table 12 (below).

Table 12: 2022 HDT amended, to show amended completions data for 2021-2022

2022 HDT published results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
2019-2020	2020-2021	2021-2022	2029-2022	2019-2020	2020-2021	2021-2022	2029-2022		
508	358	547	1413	591	340	340	1271	90%	Action Plan
2022 HDT published results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
2019-2020	2020-2021	2021-2022	2029-2022	2019-2020	2020-2021	2021-2022	2029-2022		
508	358	547	1413	591	340	387*	1318	93%	Action Plan

* Corrected data (+47 over previous incorrect 340 completions figure)

8.5 The corrected data does not materially affect the 2022 HDT returns, although the addition of 47 completions for the 2021-2022 monitoring year could have potential implications for subsequent HDT (2023 and/ or 2024) annual results.

Indicative 2023 HDT result

8.6 Initial completions data for the 2022-2023 monitoring period was incorrectly submitted (2023 Delta return). The Government (MHCLG) subsequently permitted the Borough Council to submit corrected completions data for the 2022-2023 and 2023-2024 figures:

- 2022-2023: Addition of 21 dwellings to reflect published trajectory (569 completions); and
- Deduction of 47 dwellings from the 2024 return and addition of these to 2022-2023 figure (increase from 569 to 616 dwellings).

8.7 Table 13 (below) explains the implications of these changes for the indicative 2023 HDT result.

Table 13: indicative 2023 HDT result, incorporating corrected 2021-2022 and 2022-2023 completions data

2023 HDT Indicative Results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2023) measurement	Housing Delivery Test: 2023 consequence
2020-2021	2021-2022	2022-2023	2020-2023	2020-2021	2021-2022	2022-2023	2020-2023		
358	547	572	1477	340	340	548	1228	83%	Action plan & Buffer
2023 HDT Actual Results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2023) measurement	Housing Delivery Test: 2023 consequence
2020-2021	2021-2022	2022-2023	2020-2023	2020-2021	2021-2022	2022-2023	2020-2023		
358	547	572	1477	340	387 ¹	569 ²	1296	88%	Action plan

1. 340 + 47 dwellings carried forward from 2021-22 monitoring year
2. Corrected data (+21 over previous incorrect 548 completions figure)

KLWN 2023 HDT Reality Results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2023) measurement	Housing Delivery Test: 2023 consequence
2020-2021	2021-2022	2022-2023	2020-2023	2020-2021	2021-2022	2022-2023	2020-2023		
358	547	572	1477	340	340	616 ³	1296	88%	Action plan

3. 569 + 47 dwellings carried forward from 2021-22 monitoring year

8.8 The housing completions data, as initially submitted in 2023, would have triggered a need to include a 20% buffer in 5 year housing land supply calculations, given that the Borough Council would fall below the 85% threshold.

8.9 It is therefore critical to ensure the BC is measured against the correct completions data for the HDT. 68 dwellings were added to the 2022-2023 monitoring data, to reflect corrections to the 2021-2022 and 2022-2023 data, for a revised return submitted to MHCLG via their Delta data collection system in October 2024. This indicates a reduction from 90% to 88%, between the 2022 and (indicative) 2023 HDT results.

Indicative 2024 HDT result

8.10 The initial MHCLG Delta returns for the 2023-2024 monitoring year were submitted in September 2024. These indicated 653 completions (606 + 47 completions carried forward from the 2021-2022 monitoring period). Corrected data for the 2024 monitoring period was submitted in October 2024, alongside the corrected 2023 Delta return.

8.11 Table 14 (below) explains the implications of these changes for the indicative 2024 HDT result.

Table 14: indicative 2024 HDT result, incorporating corrected 2021-2022 and 2022-2023 completions data

2024 HDT Indicative Results									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2024) measurement	Housing Delivery Test: 2024 consequence
2021-2022	2022-2023	2023-2024	2021-2024	2021-2022	2022-2023	2023-2024	2021-2024		
547	572	554	1673	340	548	653 ¹	1541	92%	Action plan
2024 published completions 2024 trajectory									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2024) measurement	Housing Delivery Test: 2024 consequence
2021-2022	2022-2023	2023-2024	2021-2024	2021-2022	2022-2023	2023-2024	2021-2024		
547	572	554	1673	387	569 ²	606	1562	93%	Action plan
2024 024 HDT Actual Results (submitted October 2024)									
Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: updated (2024) measurement	Housing Delivery Test: 2024 consequence
2021-2022	2022-2023	2023-2024	2021-2024	2021-2022	2022-2023	2023-2024	2021-2024		
547	572	554	1673	340 ³	616 ⁴	606	1562	93%	Action plan

- 606 + 47 dwellings carried forward from 2021-22 monitoring year
- Corrected data (+21 over previous incorrect 548 completions figure)
- 340 completions reported in 2022 HDT results retained
- 569 + 47 dwellings carried forward from 2021-22 monitoring year

8.12 The submission of corrected returns for the 2022-2023 and 2023-2024 monitoring period allows the Borough Council to be confident that the indicative 2024 HDT result is correct and reflective of actual delivery rates during the previous two monitoring periods.

8.13 Overall, the latest (2024) indicative result (93%) indicates a 5% increase from the indicative (2023) figure (88%). This also represents a marginal (3%) improvement to the Borough Council's position from 2022. However, the HDT figure still falls marginally below the 95% "pass" figure.

8.14 Accordingly, the HDT Action Plan remains important in setting out possible approaches to the Borough Council to further boost housing delivery rates. The indicative 2023 and 2024 results indicate it is likely that there remains a requirement to produce/ review the HDT Action Plan for the forthcoming year(s).

9. Monitoring

9.1 The BC recognises the importance of monitoring housing completions and has continued to carry forward the comprehensive way in which housing completions are monitored. This has evolved over time to a smarter approach utilising technology and intelligence captured by other BC services and external organisations; the main methods of data collection currently include those listed below. However, we are alive to new methods that technology may enable and will consider these moving forward:

- Using dedicated computer software to record information, in combination with GIS software.
- Dedicated team established for monitoring purposes.
- Intelligence from BC Council Tax department.
- BC waste and refuge information.
- BC Street Naming & Numbering intelligence.
- Community Infrastructure Levy (CIL) information.
- Condition monitoring information.
- Planning officer information.
- Contacting the owners/agents/developers of the site
- In person site visits
- Information from the Valuation Office Agency (VOA) via Geo-Place.
- Ordnance Survey (OS) digital mapping updates.

9.2 The HDT Action Plan should work alongside the Council's plan monitoring processes. The Authority Monitoring Report (AMR)¹⁴ provides the definitive record for plan monitoring, including housing delivery.

9.3 The AMR is a requirement of the 2004 Planning and Compulsory Purchase Act. The most recent AMRs (since 2016) are prepared with reference to the current Local Plan (consisting of the 2011 CS and 2016 SADMP). Given that more than 5 years have passed since adoption of the SADMP (September 2016), housing delivery is now monitored with reference to the annual calculation for local housing need (using the Government's standard method). The latest figure (554 dwellings per year – section 4, above) has been utilised for the replacement Local Plan 2021-2040.

9.4 The recent consultation on revisions to the NPPF and wider planning reforms, which includes a new standard method, would lead to a near doubling of the Borough

¹⁴ https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/354/authority_monitoring_reports_amr

Council's local housing need (LHN), from 554 to 1,042 new homes required per year. However, the Government has proposed transitional arrangements where there is an adopted spatial development strategy of less than 5 years old (i.e. 554 dwellings per year), then this would form the benchmark against which housing delivery should be measured. Therefore, housing delivery would be monitored against the current LHN, until at least the 2029-2030 monitoring period. This is why it important that the emerging Local Plan is adopted before the end of the current financial year.

10. Housing Delivery Test Action Plan: Actions

10.1 In 2023 the Borough Council adopted a new Corporate Strategy¹⁵. This sets out a vision for: *“A place where people can thrive, the environment is protected, heritage is preserved, and development meets the needs of people as well as legislation”*. This should be achieved through a range of overarching themes and priorities relating to housing delivery, including:

- *Promote growth and prosperity to benefit West Norfolk;*
- *Support our communities;*
- *Work collaboratively; and*
- *Implementing our priorities.*

10.2 The Corporate Strategy sets out a range of potential measures for achieving corporate priorities, with reference to housing delivery. These are as follows:

- Work with partners to develop a shared vision for a vibrant borough
- Increase the number of good quality new homes and associated infrastructure built through direct provision by working with registered social landlords and private sector developers
- Encourage private sector housing development that supports local need, delivers on local infrastructure
- Provide information to local people, businesses and visitors in a timely and accessible manner
- Improve access to affordable homes and work to improve the quality of rented accommodation.

10.3 The Corporate Strategy provides an overarching framework, within which the Action Plan should function. Figure 10 (below) outlines actions have been identified by the Borough Council, seeking to increase housing supply and delivery. These are categorised in timescales of when each could be achieved. They are based upon the Borough Council's ongoing activities and the analysis of the housing completions and permission data available.

¹⁵ https://www.west-norfolk.gov.uk/info/20163/corporate_performance_and_transparency/1090/corporate_strategy_2023_-_2027

Figure 10: HDT – Actions identified to increase housing delivery

Summary of Actions identified (further details are provided in Appendix)	Relevant measure(s) identified in Corporate Strategy
<p>Ongoing:</p> <ul style="list-style-type: none"> • Continue to proactively work with partners towards delivery of the West Winch Housing Growth Area (WWHGA) and associated infrastructure. • Consider mechanisms and working arrangements for reducing the time given to planning permissions, in light of the Housing Delivery Test result and future five-year housing land supply positions. • Continue to provide support for those communities wishing to prepare a Neighbourhood Plan for their area and if appropriate support neighbourhood plan allocations. • Continue to provide Member training, to understand their role in supporting housing delivery. • Continue to proactively monitor overall housing delivery (completions and permissions), including allocated sites (i.e. planned growth) • Norfolk Strategic Planning Framework - continue to support this non-statutory plan for Norfolk, which functions as a Statement of Common Ground between Norfolk authorities • Borough Council to carry out its functions with regard to its established housing companies and seek to provide further housing within the Borough. • Implement the Actions set out in the Borough Council’s Custom and Self-Build Action Plan, including providing opportunities for and raising awareness of this method of delivery. • The Regeneration Team should continue to bring forward projects which provide opportunities for bolstering housing delivery; e.g. Economic Strategy, town centre parking studies etc. 	<ul style="list-style-type: none"> • Increase the number of good quality new homes and associated infrastructure. • Encourage private sector housing development that supports local need, delivers on local infrastructure.
<p>Short Term (1-2 years):</p> <ul style="list-style-type: none"> • Move to determination of applications in accordance with Local Plan 2021-2040 and national policy, to provide clarity, certainty and consistency. • Review and update Housing Delivery Test (HDT) Action Plan as appropriate. • Review Borough Council’s partnerships and working arrangements with private sector construction firms. 	<ul style="list-style-type: none"> • Work with partners to develop a shared vision for a vibrant borough. • Encourage private sector housing development that supports local need, delivers on local infrastructure. • Provide information to local people, businesses

Summary of Actions identified (further details are provided in Appendix)	Relevant measure(s) identified in Corporate Strategy
<ul style="list-style-type: none"> • Analyse and consider potential opportunities for securing funding opportunities to support housing delivery; e.g. West Norfolk Shared Prosperity Funding, Rural England Prosperity Funding. • Adoption of replacement Local Plan 2021-2040 –maintaining opportunities to bring forward a balanced portfolio of sites in terms of size, location, and Greenfield / Brownfield. • Produce a new Strategic Housing Marketing Assessment (SHMA) which could support the next Local Plan. • Development of new Strategic Infrastructure Delivery Plan (IDP), to better coordinate delivery of infrastructure to support housing delivery. • Continue to work with adjoining local authorities, including as part of the Norfolk Strategic Planning Framework. 	<p>and visitors in a timely and accessible manner.</p> <ul style="list-style-type: none"> • Improve access to affordable homes and work to improve the quality of rented accommodation.
<p>Medium Term (2-5 years):</p> <ul style="list-style-type: none"> • Prompt implementation of housing schemes on the Borough Council’s own sites – Build out of Borough Council sites which are allocated, have planning permission, or funding. • Once the emerging Local Plan has been adopted commence work on a new Local Plan – The Government is currently considering what a new local plan preparation framework will look like. Part of this is based on Levelling Up and Regeneration Act (LURA 2003), however we await further consultation on this. It is currently anticipated that the new plan making framework could be in place by summer/ autumn 2025. • Borough Council to consider future programme for Rural Exception Sites (affordable housing). • Borough Council to carry out its functions as a Registered Provider and consider direct provision of affordable housing. • Consider sites which may have stalled. 	<ul style="list-style-type: none"> • Work with partners to develop a shared vision for a vibrant borough. • Pro Increase the number of good quality new homes and associated infrastructure. • Provide information to local people, businesses and visitors in a timely and accessible manner.
<p>Long Term (5+ years):</p> <ul style="list-style-type: none"> • Borough Council to consider delivering more homes – both on own land and consider other options. • Progress and adopt new Local Plan. 	<p>N/a – current Corporate Strategy expires in 2027</p>

- 10.4 The Action section (Appendix, below) describes current and ongoing projects and activities that the Council is actively engaged in maximising opportunities to deliver the necessary housing to meet local needs. It sets out specific actions that ensure the BC fulfils both its legal obligations and strategic aspirations, as specified in the Corporate Strategy.
- 10.5 The Borough Council realises that if it is to meet the tests set by Government, then we need to play to our strengths. Based upon the detailed analysis of housing delivery and supply carried out across the previous (2019 and 2020) Housing Delivery Test Action Plans and this one, strengths include in-house expertise in direct delivery through the Borough Council's actions on land it owns and active intervention on other sites (as necessary). It also means creating a policy framework which enables opportunities for sustainable windfall sites to continue to come forward at sustainable locations and in a sensitive manner, promoting growth and prosperity and supporting our communities, in line with the Corporate Strategy.
- 10.6 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. A more obvious measure is to ensure the Borough Councils continues to grant planning permission for Local Plan site allocations and proposals for sustainable windfall development, in accordance with the development plan, unless material considerations indicate otherwise, and without delay.
- 10.7 Actions will be monitored through future updates to the Housing Delivery Test Action Plan. The Appendix below provides a detailed and comprehensive review of specific actions that the Council can pursue to achieve successful housing delivery, meeting local needs.

Appendix – BCKLWN Housing Delivery Test Action Plan: Specific Actions

No.	Action	Time Scale	2024 Progress	Conclusions
Ongoing				
1.	Continue to proactively work with partners towards delivery of the West Winch Housing Growth Area (WWHGA) and associated infrastructure	On-going	<ul style="list-style-type: none"> Emerging Local Plan at an advanced stage of preparation; West Winch Growth Area Framework Masterplan adopted as Supplementary Planning Document in January 2023 (South East King's Lynn Growth Area Framework Masterplan South East King's Lynn Growth Area Framework Masterplan Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk)); Updated and strengthened policy to enable delivery of 4,000 homes and ensure timely delivery of necessary infrastructure; 2,030 homes anticipated to come forward during the new Local Plan period (2021-2040); Outline planning permission for 1,110 dwellings and associated infrastructure granted (subject to S106) in August 2024 (13/01615/OM); NCC has submitted outline business case to DFT for funding towards West Winch Housing Access Road which will unlock development on the site beyond the Hopkins application; Homes England funding secured to forward fund developer contributions to the West Winch Housing Access Road (WWHAR). 	<p>The West Winch Housing Growth Area is a long-term strategic housing location and work towards this should continue in a positive and collaborative way.</p> <p>The Borough Council has recently approved the first development phases (northern phase – over 1,100 dwellings) and will continue to work with partners and developers to bring forward the entire strategic site allocation in the coming years.</p>
2.	Implement the Actions set out in the Borough Council's	On-going	<ul style="list-style-type: none"> A site for 25 C&SB homes at Upwell, allocated in the Local Plan is complete. 	The approach the BC have adopted with regard C&SB is very

No.	Action	Time Scale	2024 Progress	Conclusions
	<p>Custom and Self-Build Action Plan, including providing opportunities for and raising awareness of this method of delivery</p>		<ul style="list-style-type: none"> • A C&SB scheme at Ingoldisthorpe has for 12 homes is complete. • Since 2023, several C&SB sites have been permitted, in the wake of changes to the BC's legal obligations under the 2023 Levelling Up and Regeneration Act (LURA). • Within the first five C&SB base periods (1 April – 30 October 2016, then 31 October 2016 – 30 October 2020), 137 C&SB units (including 37 at the Upwell and Ingoldisthorpe sites) were delivered. • The BC is exploring options to bring forward one of its sites allocated in the Local Plan as C&SB • The Local Plan seeks to encapsulate the BC's positive approach to C&SB, through new policies for C&SB and windfall development (published as Main Modifications, August 2024) 	<p>positive and this along with the C&SB Action Plan. This has seen delivery of C&SB projects; e.g. Ingoldisthorpe and Upwell.</p> <p>In view of changes associated with the LURA, a number of initiatives may be necessary to support delivery. These could include reconvening the C&SB Task Group, undertaking the health-check process from the National Custom & Self Build Association (NaCSBA), and/ or updating the CSB Action Plan.</p> <p>This could lead to more desirable homes and increased delivery rates.</p>
3.	<p>Consider mechanisms and working arrangements for reducing the time given to planning permissions, in light of the Housing Delivery Test result and future five-year housing land supply positions</p>	On-going	<ul style="list-style-type: none"> • Capacity within the Development Management team has slightly increased (a small amount of additional resource), in recognition of the demands of timely approval of appropriate sites • Delivery needs to be supported by rigorous and systematic monitoring processes for the discharge of conditions, allowing for timely on-site starts. 	<p>Demands upon the Development Management service remain high. Changed working practices could be an important tool and thus should remain an Action.</p>
4.	<p>Continue to provide support for those communities</p>	On-going	<p>Neighbourhood Plan activity within the borough remains popular, with 39 parishes designated</p>	<p>Neighbourhood Plans are vital pieces of the planning jigsaw</p>

No.	Action	Time Scale	2024 Progress	Conclusions
	wishing to prepare a Neighbourhood Plan for their area and if appropriate support neighbourhood plan allocations		<p>Neighbourhood Areas (as of August 2024). 20 Neighbourhood Plans are made, with several others are at different stages, including two Plans anticipated to come forward during the 2024-2025 financial year (North Wootton and Ringstead).</p> <p>Made Neighbourhood Plans (Castle Acre, Holme Next The Sea, Sedgeford, Snettisham and Upwell) have allocated land for a total 153 dwellings. The emerging Ringstead Neighbourhood Plan proposes a further allocation for 5 dwellings.</p>	puzzle, offering local communities an opportunity to plan their Area. This Action should remain and more resource could be allocated towards supporting them due to the continued growth/ interest in this field
5.	Continue to provide Member Training, to understand their role in supporting housing delivery	On-going	<p>Previous Member training programmes included external training with regards to the updated NPPF and decision making, together with more focused training in-house and updates.</p> <p>The 2023 Corporate Strategy will develop this theme, through ongoing work to develop new organisational values with staff and members and to establish a set of behaviours that support these priorities.</p>	It is important the members are up to speed and aware of changes to the planning system and recent case law. As well as the quality and speed of decisions of the BC and the local position now and going forward with regard to housing supply and completions.
6.	Continue to proactively monitor overall housing delivery (completions and permissions), including allocated sites (i.e. planned growth)	On-going	<p>The first HDT Action Plans (2019 and 2020) touched upon the monitoring process. In recent years this has been overhauled, through the creation of a dedicated monitoring team (alongside geographical information systems (GIS)).</p> <p>The Council continues to submit annual government returns on a number of topics (including overall housing delivery; affordable housing; C&SB), via the Government's Delta reporting system.</p>	It is essential that this continues in such a positive vein, given the focus on housing supply and delivery. The BC should continue to explore and implement new smarter methods for monitoring and presentation of the data.

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>The Borough Council is also exploring options to make the process more user friendly and smarter through the use of GIS software.</p>	
7.	<p>Norfolk Strategic Planning Framework (NSPF) - continue to support this non-statutory plan for Norfolk, which functions as a Statement of Common Ground between Norfolk authorities.</p>	On-going	<p>See Action 17 (below). The NSPF encompasses the Duty to Cooperate, covering all Norfolk local planning authorities and the County Council.</p> <p>In addition to formal working through the NSPF, there is a need to work with other neighbouring LPAs. This is of particular importance in the case of Fenland as there is a shared strategic housing allocation in both Local Plans, with the BC element being approx. 550 new homes. Further to this, relationships with Cambridgeshire County Council and the Cambridgeshire and Peterborough Combined Authority, with regard to Rail and Road upgrades, could facilitate jobs and more housing.</p>	<p>Remain part of the Norfolk Strategic Planning Group; also continuing to work with other local authorities (notably Fenland) to deliver major strategic sites.</p>
8.	<p>Borough Council to carry out its functions with regard to its established housing companies and seek to provide further housing within the Borough</p>	On-going	<p>The Borough Council continues to monitor the effectiveness of established housing companies as a delivery mechanism (see also Actions 12 and 18 – below). The Borough Council has set up two separate companies, both of which can also play an important role in supporting housing delivery:</p> <ol style="list-style-type: none"> 1. West Norfolk Housing Company – operates as a Registered Provider of Social Housing and has acquired housing secured through S106 agreements, once homes complete. Other functions include the provision of temporary accommodation. 	<p>Review role of established housing company in light of relevant measures specified in the new (2023) Corporate Strategy; e.g. encouraging private sector housing development that supports local need.</p> <p>This diverse and proactive approach by the Borough Council demonstrates a continued commitment to diversifying</p>

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>2. West Norfolk Property (WNP) – acquire private rented sector properties as commercial lettings. 74 dwellings were acquired for private rents from Borough Council developments, allowing diversity of tenures to be achieved on new development sites.</p> <p>This use of public and private mechanisms to secure housing delivery could involve initiating funding and transformational opportunities, similarly to those that have already successfully seen housing delivery within the Borough (e.g. Action 12). Considering recent progress, this could lead to accelerated construction of new builds, conversions and possibly modern methods of construction through schemes; e.g.:</p> <ul style="list-style-type: none"> • Homes England Accelerated Construction Programme • Brownfield Land Release Fund • Devolution for Norfolk 	<p>mechanisms by which housing can be delivered; i.e. spreading risk. Notably, WNP reduces risk for the Borough Council, by providing alternative tenures to private/ freehold sale of houses.</p> <p>In future, the Borough Council could work to facilitate further housing delivery, although this would not necessarily be through establishing a separate housing company.</p>
9.	The Regeneration Team should continue to bring forward projects which provide opportunities for bolstering housing delivery; e.g. Economic Strategy, town centre parking studies etc.	On-going	<p>The BC’s Regeneration Team continues to pursue potential funding sources (see Action 13, below) and projects that may provide opportunities to boost housing delivery. It must be borne in mind that delivery of high-quality housing to meet local needs.</p> <p>The following strategies are being developed or are already in place, with opportunities for promote and boosting housing delivery:</p> <ul style="list-style-type: none"> • West Norfolk Economic Strategy (10 years: 2024-2029), anticipated adoption during 	<p>Regeneration strategies, although focused upon economic growth, include priorities for potential opportunities for focusing housing delivery in/ around town centres as part of wider regeneration objectives.</p> <p>These objectives focus upon wider opportunities and initiatives for improvements to</p>

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>2024-2025 financial year.</p> <ul style="list-style-type: none"> • Transport strategies etc – improving accessibility for active transport; air quality improvements; town centre parking etc (to enhance King’s Lynn as a place to live/ work). • King’s Lynn Town Investment Plan (2021). • Regeneration Masterplans – Hunstanton, Riverfront and Southgates. • Review brownfield development opportunities on publicly owned sites within urban areas for potential residential and/ or mixed use housing delivery. <p>New working arrangements between the Development Management and Regeneration teams have recently been put in place (2024) to better coordinate delivery of regeneration projects at the development management stage. This improved corporate working should improve outcomes such as timely delivery of specific projects that include housing delivery.</p>	<p>the economic and living environment, including quality of life, for King’s Lynn and Hunstanton. An element of housing in specific projects may provide opportunities to ensure development viability.</p>
Short Term (1-2 years)				
10.	Move to determination of applications in accordance with Local Plan 2021-2040 and national policy, to provide clarity, certainty and consistency	Short term (1-2 years)/ Medium Term (2-5 years)	The Local Plan examination is nearing conclusion, with receipt of the Inspectors’ Report anticipated by early-2025. The Local Plan examination has required the BC to provide detailed evidence to demonstrate that all planned growth (i.e. allocations) are achievable within the Plan period (by 2040).	Adoption of the new Local Plan is vital for housing supply and completions as well as ensuring development is sustainable and in the right locations. The replacement Local Plan will allow applications to be determined

No.	Action	Time Scale	2024 Progress	Conclusions
			As of August 2024, the Local Plan had reached an advanced stage of preparation, with publication of Main Modifications. This means the BC is on course for the Plan to be adopted during the 2024-2025 financial year.	more efficiently and quickly, due to the replacement Local Plan being a single document, and unequivocally current/ up to date.
11.	Review and update Housing Delivery Test (HDT) Action Plan	Short term (1-2 years)	The HDT Action Plan has been reviewed, in light of the BC's latest HDT result (2022, published December 2023). It would be good practice to continue this even if the BC passes the next HDT as good practice and to continue to understand the housing position within the Borough (2023, anticipated publication of result late-2024/ early-2025).	If triggered, preparation of an updated HDT Action Plan should remain an Action.
12.	Review Borough Council's partnerships and working arrangements with private sector construction firms	Short term (1-2 years)	<p>The Borough Council has worked directly with contractors in delivering major housing projects in King's Lynn and Hunstanton. In 2015 the BC entered into a Major Housing Programme with Lovell Partnerships Ltd (New Build Homes New Housing Developments Lovell Homes), to deliver 1000 homes. This project is continuing, although as of 2024 the majority of sites have now been delivered; over 500 dwellings, compared to 130 at the time of the previous (April 2020) HDT Action Plan Update. Lovell Homes has a further 432 units yet to deliver, in partnership with the Borough Council.</p> <p>In association with the Local Plan examination, the BC has sought to engage closely with housebuilders to improve monitoring of housing delivery and set robust site trajectories as part of bolstering the Local Plan monitoring process.</p>	<p>The BC's partnership with Lovell has continued to secure delivery of the Council's Major Housing Programme, with over 500 dwellings now delivered.</p> <p>This should be bolstered by wider engagement with housebuilders across the Borough, to support and encourage timely delivery and effective monitoring for committed sites.</p>

No.	Action	Time Scale	2024 Progress	Conclusions
13.	Analyse and consider potential opportunities for securing funding opportunities to support housing delivery; e.g. West Norfolk Shared Prosperity Funding, Rural England Prosperity Funding (West Norfolk Shared Prosperity Funding Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk))	Short term (1-2 years) – 2023-2025	<ul style="list-style-type: none"> • £1,836,407 UKSPF revenue and capital for investment fully committed for the Borough, as a whole, over a three-year period until March 2025, although there are no interventions specifically identified to support housing delivery: see REPORT TO CABINET (west-norfolk.gov.uk) • Homes England funding streams; e.g. Brownfield Infrastructure and Land Fund, Affordable Homes Grant • Several regeneration, climate change, cultural accessibility and social action projects, but none related to housing delivery 	Limited opportunities, as mainly focused upon economic, community and cultural development projects, with reference to the West Norfolk Investment Plan. Housing could be delivered as part of wider physical, cultural and social infrastructure investment, potentially drawing upon UK Shared Prosperity Funding or other potential sources.
14.	Adoption of replacement Local Plan 2021-2040 – maintaining opportunities to bring forward a balanced portfolio of sites in terms of size, location, and Greenfield / brownfield.	Short term (end of 2024-2025 Financial Year)	<p>The Local Plan review is broadly progressing in line with the latest adopted Local Development Scheme (LDS), April 2024.</p> <p>Plan hearings have recently concluded (September 2024), with consultations on Main Modifications due to take place in two stages (Part 1, August – October 2024; Part 2, October – November 2024). These consultations are the final stages in the Plan examination process, meaning the Borough Council is on target to adopt the Local Plan during the current (2024-25) financial year.</p> <p>The Plan identifies three principal sources for housing, as follows:</p> <ul style="list-style-type: none"> • Housing land allocations – the majority rolled forward from the current Local Plan, where 	<p>The Local Plan examination continuing. It is anticipated that the Inspectors' Report will be received late-2024/ early 2025. This will allow adoption of the Plan in the current financial year (by March 2025).</p> <p>It is crucial that the BC has an up-to-date Local Plan. This will ensure that the BC retains an element of control, there is enough allocations made to meet the need over the short, medium and long term, and that decisions are made in accordance with an up-to-date plan.</p>

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>they remain deliverable;</p> <ul style="list-style-type: none"> • Additional development capacity through made Neighbourhood Plan allocations (over 150 dwellings); and • Windfall development, including new policies providing a positive framework to allow for sustainable development to come forward. 	
15.	Produce a new Strategic Housing Marketing Assessment (SHMA)	Short term (1-2 years)	<p>The latest Housing Needs Assessment (HNA) was finalised in 2020 and submitted alongside the Local Plan, covering the period to 2036.</p> <p>A new Housing Needs Assessment has been commissioned. This will explain the current (post-Covid) situation within the Borough and could provide additional evidence to support the delivery of an appropriate housing mix and inform a future Local Plan review.</p>	<p>A key evidence document required to support a future Local Plan review in particular with regard to the type and tenure of homes required to meet local housing need.</p> <p>It is likely that any anticipated Local Plan review would start during 2025-2026, following adoption of the Local Plan 2021-2040. This would align closely to the anticipated publication of an updated HNA (2025).</p>
16.	Development of new Strategic Infrastructure Delivery Plan (IDP), to better coordinate delivery of infrastructure to support housing delivery	Short term (1-2 years)	<p>An IDP was produced in September 2022, to support the Local Plan examination (F24 - Infrastructure Delivery Plan, September 2022). This requires further updating to ensure it remains relevant. The importance of coordinating housing and infrastructure delivery is critical and development of an updated IDP will improve opportunities to bring forward new housing delivery in a timely, coordinated and sustainable manner.</p>	<p>New action; in recognition of the importance of coordinating delivery of supporting infrastructure (physical, social and green infrastructure), towards delivering sustainable developments.</p>

No.	Action	Time Scale	2024 Progress	Conclusions
17.	Continue to work with adjoining local authorities, including as part of the Norfolk Strategic Planning Framework, including specific projects such as the strategic housing delivery study	NSPF update – short term (1-2 years) Joint working arrangements – ongoing	<p>The NSPF is vital to ensuring a joined up approach to planning across Norfolk and continues to be supported by the BC. It functions as a Statement of Common Ground for the preparation of Local Plans across the County.</p> <p>The current NSPF was adopted in May 2021. As of autumn 2024, a further update is underway with the focus on themes such as climate change, health, communications and housing delivery. It is anticipated this will be published for consultation during the 2024-2025 financial year and adopted in 2025.</p> <p>Preparation of the NSPF is led by the Norfolk Strategic Planning Member Forum (NSPMF), supported by the officer Norfolk Strategic Planning Group (NPSG). These forums are important to recognise the importance of strategic/ cross-boundary working in coordinating and monitoring housing delivery.</p>	This is considered of high importance and its continued support should be endorsed and recognised through the BC HDT AP. It recognises the wider strategic issues affecting housing delivery; e.g. regarding housing market areas, which typically do not reflect administrative boundaries.
Medium Term (2-5 years)				
18.	Prompt implementation of housing schemes on the Borough Council’s own sites – Build out of Borough Council sites which are allocated, have planning permission or funding (Project background Borough)	Short/ Medium term (up to 5 years)	<p>11 separate projects were developed, in response to the Coalition Government’s 2011 Housing Strategy. These schemes were proposed to deliver up to 1000 dwellings on sites within King’s Lynn and Hunstanton. The following sites are complete:</p> <ul style="list-style-type: none"> • Marsh Lane; • Lynn Sport – phases 1 and 2; • Nar Valley Park (NORA) – phases 1-4. 	<p>Strong progress, and with outstanding sites all coming forward this Action is being met and should be retained for the short/ medium term.</p> <p>Over 500 dwellings have already been delivered through this</p>

No.	Action	Time Scale	2024 Progress	Conclusions
	Council of King's Lynn & West Norfolk (west-norfolk.gov.uk)		<p>As of summer 2024, the following sites were under construction:</p> <ul style="list-style-type: none"> • Parkway (226 dwellings); • Salters Road (78 dwellings); • Southend Road, Hunstanton (32 dwellings); • Lynnsport – phase 3 (96 dwellings). 	<p>mechanism, with a further 430 units now under construction/ in the pipeline.</p>
19.	Consider sites which may have stalled	Medium term (2-5 years), following adoption of Local Plan/ as part of future review	<p>The previous HDT Action Plans (2019/ 2020) identified the need to analyse stalled sites. This process was undertaken as part of the ongoing Local Plan examination (2022-2024). It has resulted in a number of sites, allocated in the current Local Plan (2016 SADMP) and included in the replacement Plan (as submitted) being subsequently proposed for deallocation (total 190 dwellings).</p> <p>To ensure sufficient housing land supply, the replacement Local Plan 2021-2040 includes a new windfall policy as a Main Modification (MM6), to ensure a sufficient housing land supply can be maintained throughout the Plan period.</p>	<p>As part of the monitoring following adoption of the replacement Local Plan, it will be necessary to collate evidence for site deliverability. This will allow an accurate trajectory for housing delivery to be maintained. Sites which appear to be stalled could be considered for deallocation as part of a future Local Plan review.</p>
20.	Borough Council to consider future programme for Rural Exception Sites (affordable housing).	Medium term (2-5 years)	<p>The previous HDT Action Plan (April 2020) proposed proactive delivery of Rural Exceptions Housing schemes as a potential action. This was not pursued at the time. The Council continues to engage with local communities and housing associations where there is interest in delivery of affordable housing.</p> <p>Now that the replacement Local Plan is nearing adoption, there is an opportunity to consider whether</p>	<p>New initiatives for Rural Exception Housing schemes could be undertaken in association with other initiatives; e.g. moves to bolster Custom & Self-Build (C&SB) housing delivery. These could be undertaken in the medium term, following adoption of the replacement Local Plan</p>

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>a programme of delivering Rural Exceptions housing schemes could be developed. The new policy in the local plan will give clarity as to how these can be brought forward.</p>	<p>(spring 2025).</p>
21.	<p>Once the emerging Local Plan has been adopted commence work on a new Local Plan – The Government is currently considering what a new local plan preparation framework will look like. Part of this is based on Levelling Up and Regeneration Act (LURA 2003), however we await further consultation on this. It is currently anticipated that the new plan making framework could be in place by summer/ autumn 2025.</p>	<p>Medium term (2-5 years)</p>	<p>N/A – the BC’s priority remains adoption of the Local Plan 2021-2040, although it is inevitable that a prompt replacement/ update will need to be undertaken, in light of emerging legislative (2023 LURA and associated secondary legislation) and national policy (NPPF update) changes.</p> <p>Although there are uncertainties associated with anticipated changes to the planning system, it is almost certain that the Government will remain committed to some form of plan-led approach. Any future Local Plan would be undertaken under the new system (part of which has been introduced through the 2023 Levelling Up and Regeneration Act (LURA). The Government have said they will consult on this further including regarding the potential introduction of National Development Management Policies and speeding the local plan preparation process up.</p>	<p>Medium term following adoption of the Local Plan 2021-2040 and national legislative and policy changes, so should remain part of the HDT AP.</p>
22.	<p>Borough Council to carry out its functions as a Registered Provider and consider direct provision of affordable housing</p>	<p>Medium term</p>	<p>Action 8 (above) considers how the Borough Council’s role in housing delivery should progress, in view of the recent publication of the new Corporate Strategy. The role of the Borough Council and its separate private housing companies works to secure diversity of tenure.</p> <p>As stated (Action 4, above), the Borough Council is</p>	<p>The BC should continue to review its functions, in light of the new Corporate Strategy and ongoing budgetary constraints. This Action should therefore remain part of the BC HDT Action Plan.</p> <p>It is noted that there are many</p>

No.	Action	Time Scale	2024 Progress	Conclusions
			<p>engaged in direct construction of schemes to deliver up to 1,000 dwellings within King’s Lynn. Alongside the successful delivery of affordable housing through direct public sector intervention, the Nar Ouse Regeneration Area (NORA 4) has delivered a wider mix of tenures, notably 50% private rented sector housing (managed by West Norfolk Property). Of the total number of units, just 35 were sold as freehold; i.e. the majority are either private rented or affordable.</p> <p>As part of the Council’s role in housing delivery going forward, direct intervention through the housing company should entail delivery of affordable housing in line with Local Plan policy requirements (both current and replacement Plans).</p>	<p>potential models for bringing forward affordable housing, including direct delivery, or through a separate housing company. The successful delivery of NORA 4 illustrates the Borough Council’s ongoing commitment to diversifying the range of tenures on sites where it is involved in direct delivery of affordable housing. By securing a range of tenures this both minimises risk and maximises opportunities for direct delivery of affordable housing.</p>
Long Term (5 years +)				
23.	Borough Council to consider delivering more homes – both on own land and consider other options	Medium term (2-5 years)/ Long term (5+ years)	<p>As per other ongoing, short and medium term Actions the BC should continue to review its role in housing delivery. The new Corporate Strategy provides some direction, although the need to ensure value for money and balanced budgets continues to be a critical consideration.</p> <p>An example of such an intervention, through the major projects coming forward, is the Borough Council’s working with Lovell Partnerships Ltd since 2015, which has already delivered a significant number of new homes, including the Parkway scheme, for which construction has recently commenced.</p>	<p>This should be retained as the HDT AP establishes permission and completions from the BC sites is vital now and going forward if the Local Housing Need is to be met.</p> <p>The BC will continue to spend developer contributions collected through S106 agreements. This should be utilised to boost affordable housing delivery.</p>

No.	Action	Time Scale	2024 Progress	Conclusions
24.	Progress and adopt new Local Plan	Medium term (2-5 years)/ Long term (5+ years)	<p>See Action 21 (above).</p> <p>Anticipated changes to the planning system (2023 LURA) and national planning policy mean that it is inevitable that work on a replacement to the Local Plan 2021-2040 will need to commence once the legislation for the new planning system is fully up and running (2025-2026). In practice, Local Plans need to be updated on a continuous cycle (currently 5 years), although the 2023 LURA is seeking to reduce this to less than 3-years.</p>	<p>The BC's Planning Policy team will continue to work towards maintaining an up-to-date Local Plan. The Local Plan is critical to effective management of housing delivery.</p>