

Borough Council of King's and West Norfolk

Housing Delivery Test Action Plan 2

Based upon the 2019 Results

April 2020

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

1. Introduction

- 1.1 This Action Plan is the second which the Borough Council has prepared. The requirement to do so coming only a few months following the publication of the first. This Action Plan is therefore intended to be an update/sequel to first, and should be read as such, it does not seek to replicate the content of first in totality.
- 1.2 The first took a 'deep dive' into the housing supply and delivery within the borough. This remains relevant today and that Action Plan should be consulted for the detailed exploration and analysis of housing supply and delivery, the Borough Council's monitoring process, and details of the many proactive measure the Borough Council is under taking to ensure more sustainable homes are built.
- 1.3 This Sequel Action Plan covers the following themes:
- National and local contexts
 - Setting out current housing supply through an up-to-date housing trajectory and five-year housing land supply position
 - Confirming the Housing Delivery Test result for 2019
 - An indicative Housing Delivery Test result for 2020 (direction of travel)
 - A review of the actions identified by the first Action Plan which were identified as necessary to increase both supply and delivery.
- 1.4 The Action Plan is intended to be a live document that will be reviewed annually following the publication of Housing Delivery Test (HDT) results by Government (anticipated each November).
- 1.5 Given all of the activities the Borough Council (BC) is undertaking, as explored within the this and the earlier HDT Action Plan, which contribute to planned housing delivery, it is imperative that the BC retains an element of control. Especially given the long-term nature of many of these strategic projects. Clearly mass unplanned development could have a detrimental impact upon these and the very fabric of the borough.
- 1.6 It should be noted that this Action Plan has been prepared in the first half of 2020. Accordingly, it is not possible to take account of any political or economic changes that may occur post the preparation of the Action Plan such as Brexit, Government changes, future financial difficulties, and indeed the impacts of the Covid-19 pandemic.

2. National Context

- 2.1 In order for Local Planning Authorities (LPA) to use their Local Plan effectively, the Plan must be up-to-date, the LPA should be able to demonstrate a positive 5-year housing land supply position, and also pass the Housing Delivery Test (HDT).
- 2.2 The Local Plan must meet the LPA's housing need over the plan period. The LPA must maintain an adequate supply of housing land, and attempt to ensure that these houses are actually delivered.
- 2.3 This is set out in some detail within the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), and associated publications (such as the HDT rule book).
- 2.4 The National Planning Policy Framework (NPPF) was updated in 2018 and further technical revisions took place in 2019. As well as introducing the HDT the revised NPPF also sets out how LPA's should calculate their Local Housing Need (LHN) through a newly introduced standard methodology.
- 2.5 This is a step change in that previously LPA's were benchmarked against housing supply, i.e. ensuring enough allocations were made and planning permissions granted. However, LPA's are now tested against housing delivery. This is something which it should be noted is not totally within the LPA's control.
- 2.6 This Action Plan has been prepared post the publication of the Government's '*Planning for the future*' paper. This signals an intent from Government to review and potentially change elements of the planning system, which could likely lead to changes to how LHN is calculated, the NPPF (& PPG), and the HDT. To view this paper please follow the link below:

<https://www.gov.uk/government/publications/planning-for-the-future>

3. Local Context: Local Plan & Review

- 3.1 The Borough Council's (BC) Local Plan currently comprises the Core Strategy (CS), adopted in 2011, and the Site Allocations and Development Management Policies Plan (SADMP), adopted 2016.
- 3.2 The CS provides strategic level guidance as to growth and significant issues across the Borough in the period to 2026. The CS forms one part of Local Plan. It is the main document setting out the long-term strategy, including the vision and objectives for the Borough, and the broad policies that will steer and shape new development.
- 3.3 The SADMP gives effect to this and compliments the CS. This is done so through the provision of allocations for land uses including housing and economic land to meet aspirations of the CS. It also provides a series of detailed development management policies which will assist in guiding development. The plan period covered by the Local Plan is from 2001 through to 2026.
- 3.4 As stated within the NPPF, Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 3.5 As part of the SADMP examination the BC agreed to commence an early review of its Local Plan (CS & SAMP) and create one single plan document which covers the longer term (to 2036). This is enshrined in Policy DM2A of the SADMP:

Figure 1: Policy DM2A

Policy DM2A - Early Review of Local Plan

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

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

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

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

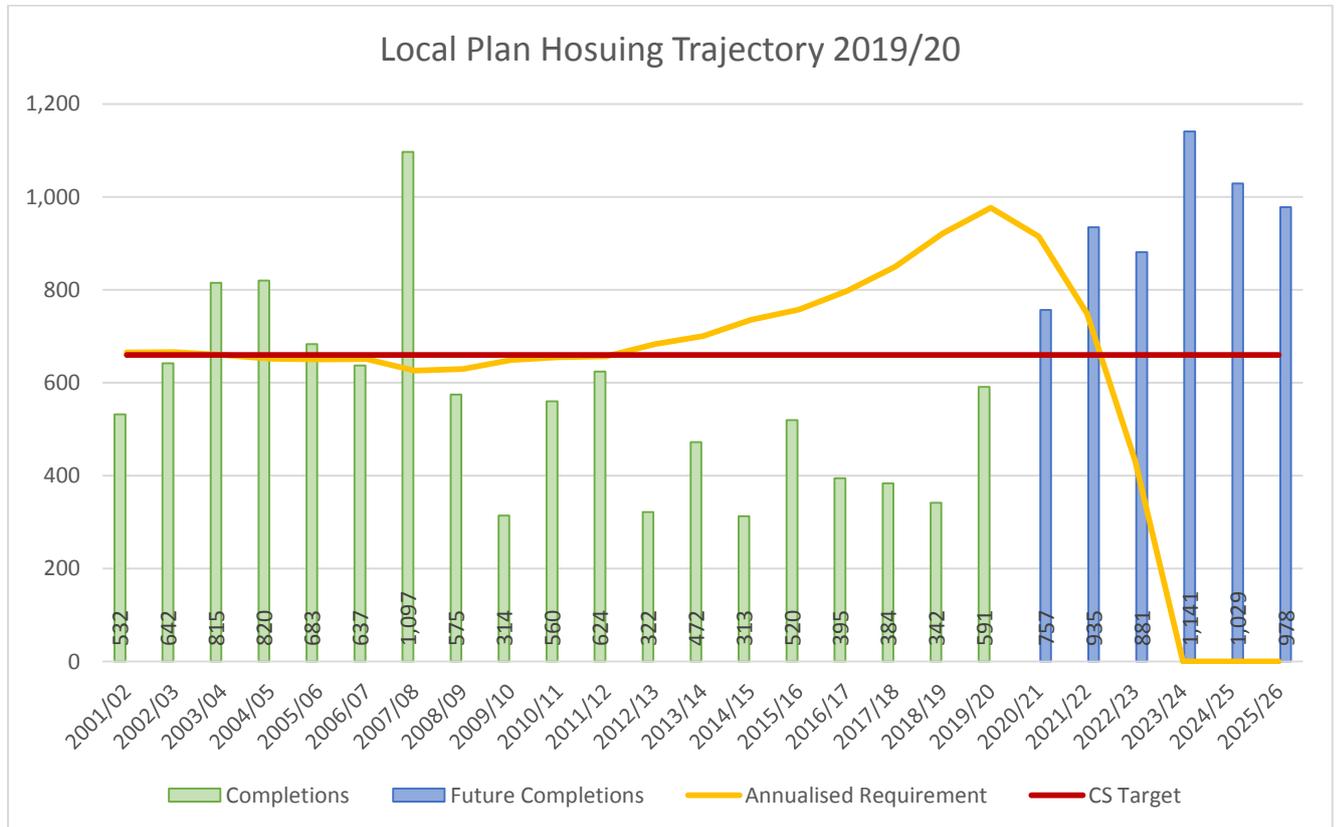
https://www.west-norfolk.gov.uk/info/20214/emerging_local_plan_review/500/local_development_scheme

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

4. Housing Trajectory

4.1 The 2019/20 housing trajectory is provided to show progress against the Core Strategy housing target of 16,500 new homes, and is shown below:

Figure 2: BC 2019/20 Housing Trajectory



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

4.3 It can be seen that to date this has remained close to the original annual target, falling below it in the mid-2000s, when delivery exceeded that planned, and rising above it reflecting reduced delivery following the 2008 economic crash/recession and subsequent recovery period. It also shows that it is expected to fall rapidly in the near future, anticipating the impact of the Site Allocations and Development Management Policies Plan (SADMP) in making a suite of allocations, these coming forward with planning proposals, gaining permission and being built out.

- 4.4 A significant proportion, around 80%, of the residential housing allocations contained within the Local Plan have already been granted planning permission, and indeed some have contributed towards completion figures already. It should also be noted that the allocations are all expressed as a minimum figure and that we have already seen a large number of sites come forward in excess of the at least number quoted within the relevant policy.
- 4.5 Overall, the trajectory shows that there is sufficient capacity to meet the Core Strategy Housing Requirement within the plan period.

5. Local Housing Need

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

Local Housing Need (LHN)

Step 1: Setting the baseline

2014 – Based Household Projections in England. Table 406:

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

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

Step 2: An adjustment to take account of affordability

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

$$2019 = 7.37$$

Adjustment Factor

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

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

Minimum annual local housing need figure

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

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

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

Step 3: Capping the level of any increase

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

- The average annual housing requirement figure in the existing relevant policies is 660 a year
- Average annual household growth over 10 years is 444 (as per step 1)

- The minimum annual local housing need figure is 539 (as per step 2)
- The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth:
- Cap = $660 + (40\% \times 660) = 660 + 264 = 924$

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

Local Housing Need (LHN) = 539

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

6. Five-Year Housing Land Supply

- 6.1 LPA's should ensure that they maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement. Therefore, LPA's should have an identifiable five-year housing land supply at all points during the plan period.
- 6.2 NPPF makes it clear that the Local Housing Need (LHN) for the purpose of plan-making and 5-year housing land supply calculations if the Local Plan was adopted over 5 years ago, should be calculated using the standard methodology. This was introduced by the revised framework and is set out within the PPG Housing need assessment chapter. This is further reaffirmed by the PPG in the Housing and economic land availability assessment chapter.
- 6.3 Following the standard method, the current LHN figure for the Borough of King's Lynn and West Norfolk is 539 dwellings per year. Note this uses data as advocated by the standard methodology. This currently comprises the 2014 – Based Household Projections in England (2016) and the 2019 Median Work Based Affordability Ratio (April 2020) both published by the Office for National Statistics (ONS).
- 6.4 The relevant five-year period is 2019/20 to 2024/2025 (financial years). The Sedgefield method has been used for the purpose of the calculation; this is consistent with the PPG.
- 6.5 The table, overleaf, is an appreciation of the various sources of housing supply taken from the 2019/20 housing trajectory. Note that a 10% lapse rate has been applied to planning permissions, this recognises that some permissions may either lapse or not complete within the five-year time period, as currently envisaged. Such a rate has not been applied to the Local Plan allocations adopted in September 2016 as part of the Site Allocations and Development Management Policies Plan (SADMP). This is because all of the allocations are expressed as 'at least x' number of dwellings. The consequence of this has seen SADMP allocations come forward with planning proposals, and gain permission, for much higher numbers than the minimum stated by the relevant policy.
- 6.6 An allowance for future windfall is made within the calculation. This is based upon windfall completions since the start of the plan period, 2001/2002. For the purpose of this 5-year land supply calculation a 25% reduction has been applied to recognise that land is a finite resource. As well as this the windfall allowance has only be factored into the final two years of the five-year calculation, allowing for a three period for such developments to come forward. This approach is in accordance with the NPPF.

6.7 It should also be noted that the latest definition of what constitutes a deliverable site has been used in accordance with the NPPF & PPG:

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

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

Table 1: Housing Supply

Housing Supply Source	
Extant consents on unallocated sites (10+)	809
Extant unallocated sites (5-9) units	293
Extant consents for small sites (1-4 units)	1,165
Sub Total	2,267
10% Lapse Rate	2,040
SADMP 2016 Allocations	1,765
ACP Additional Sites	81
Emerging Local Plan review Sites	0
Neighbourhood Plan Allocations	0
Windfall - large sites 10+ (128 p.a. years 4 & 5 only)	256
Windfall - small sites (183 p.a. years 4 and 5 only)	366
Total Identified Supply	4,508

6.8 The table above concludes that the identified supply is 4,508 dwellings for the 5-year period, from 2019/20 to 2024/2025.

6.9 The NPPF states that the level of the buffer to be applied is determined by the Housing Delivery Test (HDT) result. The BC's 2019 result is 83% (see relevant section). Therefore, in accordance with the NPPF the buffer to be applied is 20% (to ensure choice and competition). The table below provides the 5-year housing land supply calculation:

Table 2: Land supply calculation

LHN (539) x 5 (Years)	2,695
LHN x 5 + 20% (Buffer)	3,234
Identified Supply (4,508) / LHN x 5 + 20% Buffer	1.39
Above x 5 (Years)	6.97

6.10 The anticipated HDT Results for 2020 (please see relevant section), will see a return to a higher percentage pass of the HDT and therefore only a 5% buffer will be applied to the above calculation. This is because the LHN has gone down from 555 to 539 and the number of completions for the 2019/20 financial year is 591. This would result in the 5-year housing land supply position being **7.97** years' worth of supply.

6.11 Therefore, following the standard method for calculating Local Housing Need (LHN) the BC is currently able to demonstrate a 5-year housing land supply position significantly higher than 5 years' worth. The full housing trajectory and schedule will be published in due course.

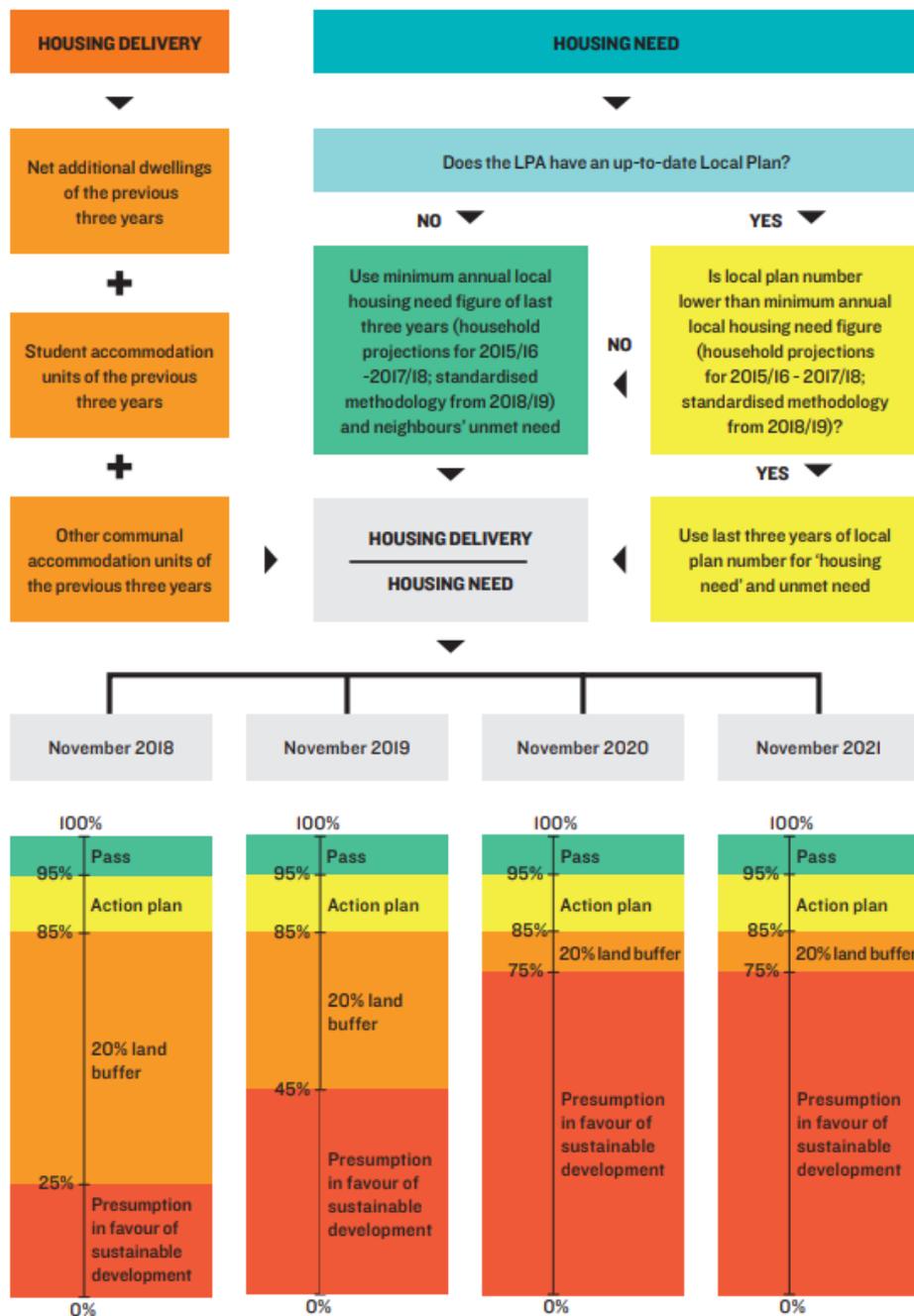
6.12 The full housing trajectory and schedule for sites can be viewed via the link below:

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

7. The Housing Delivery Test & BCKLWN 2019 Result

- 7.1 The National Planning Policy Framework (NPPF) was updated in 2018 and further technical revisions took place in 2019. The revised NPPF introduces a further test for LPA's known as the Housing Delivery Test (HDT). As the name suggest this looks at actual housing delivery. Which data sources to use are set out in some detail the HDT rule-book:
<https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>
- 7.2 The HDT is a monitoring tool the Government will use to demonstrate if local areas are building enough homes to meet their housing need. It seeks to measure how many new homes have been delivered over the past 3 years against how many new homes should have delivered over the same period. With the result expressed as a percentage. It is presented as a percentage of homes delivered against the number required over the past three years – with 95% constituting a 'pass'.
- 7.3 The consequences get tougher the greater the delivery gap. Missing the 95% pass mark but meeting at least 85% of housing requirement results in the need to prepare a HDT Action Plan. Falling below the 85%-mark results in the need to prepare the Action Plan and also include a 20% buffer within the five-year housing land supply calculation. Fall below the 45% mark and as well as the above measures the presumption in favour of sustainable development is engaged. Note these are only the thresholds for the 2019 results. The threshold for the engagement of the presumption in favour of sustainable development steadily rises to 75% for the 2020 results and is anticipated to remain there going forward.
- 7.4 Data on housing completions is collected from LPA's by the Ministry of Housing Communities and Local Government (MHCLG). The intention is that MHCLG then publish the HDT result in November each year. This position is then 'fixed' until the results are published the following the year.
- 7.5 The results dictate what penalties are bestowed upon the LPA and if action is required to be taken. This is best illustrated by the diagram published by Lichfield's reproduced on the next page:

Figure 2 : Housing delivery test methodology



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

7.6 The Housing Delivery Test Results 2019 were published on the 13/02/2019. The Borough Council's results for 2019 is provided in the table below. This has been taken from the results published by MHCLG:

Table3: BC HDT Results 2019

Area name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence
	2016-17	2017-18	2018-19		2016-17	2017-18	2018-19			
King's Lynn and West Norfolk	500	448	556	1,504	412	401	432	1,245	83%	Buffer

Source: <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

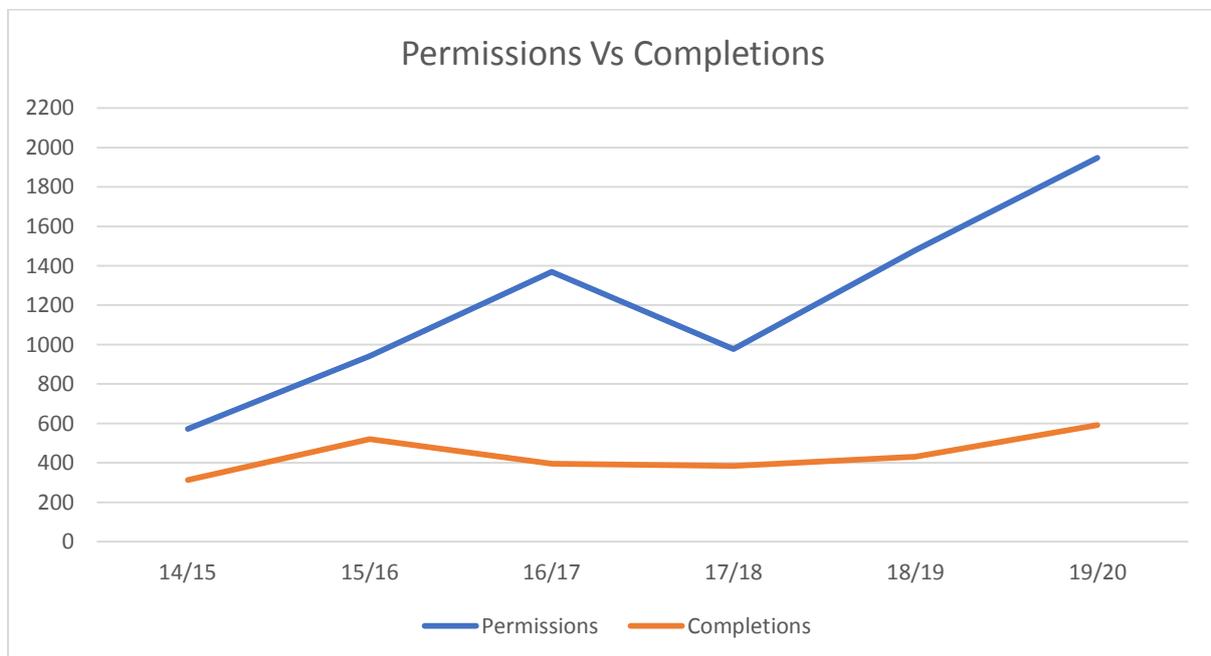
7.7 The 2019 result of 83% has two impacts the first is the requirement to update the BC's HDT Action Plan, in which the BC has 6 months to do so and the second is that a 20% buffer should be applied to the BC's 5-year housing land supply position.

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

8. Housing Supply & Delivery Update

- 8.1 The previous HDT took a 'deep dive' into the analysis of both housing supply and delivery. This still remains valid today. This Action Plan, given the small amount of time that has elapsed, does not aim to repeat that exercise and it recommended that the first Action Plan be consulted for this information and analysis.
- 8.2 In 2019/20 planning permission as granted for a further 1,948 dwellings and completions rose to 591 new homes. It should be noted that the completion figure is higher than the LHN from 2019 of 555 and the current LHN figure of 539 dwellings. To put this into perspective the chart below shows the permissions and completions each year since 2014/15:

Chart 1: Permissions Vs Completions



- 8.3 The chart also shows the gap between permissions and completions. Overall, in the past six years there have been 7,291 new homes which have been granted permission and 2,635 new homes have been completed. This is a gap of 4,656 homes.
- 8.4 There is currently permission for 3,503 new homes in borough which have not commenced. Of this and 1,538 (44%) are in Outline and 1,965 (56%) have either a Full or Reserved Matters permission in place. This shows there is a relatively large stock of permissions which could be converted into homes on the ground, but either hasn't as yet because they haven't had enough time to do so or because the controller of the site isn't moving the site forward as quickly as they might be able to. It also could represent that more sites are progressing, as last year 1,831 (54%) were in Outline and only 1,577 (46%) Full/Reserved Matters.

8.5 The conclusions of the analysis from the first HDT AP, remain valid:

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

9. BCKLWN Indicative Housing Delivery Test Results 2020

- 9.1 The HDT results are anticipated to be published November each year. They are based upon the past 3 financial years.
- 9.2 The 2019/20 financial year has completed and 591 dwellings were recorded within the Borough has having completed during this period. This is higher than the LHN at the start of the calendar year (555) and that at the start of the financial year (539).
- 9.3 Factoring these into in the HDT model could indicate that the results for 2020 would be 92% (see table below). Whilst this hasn't reached the 95% pass mark, it is a jump of 9% and would result in the need for the BC to review its Action Plan and only a 5% buffer applied in the BC's 5-year housing land supply calculation.

Table 4: BC Indicative HDT Results 2020

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2020 measurement	Housing Delivery Test: 2020 consequence
	2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
King's Lynn and West Norfolk	448	555	539	1,542	401	432	591	1,424	92%	Action Plan

10. Housing Delivery Test Action Plan: Actions

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

BCKLWN HDT AP: Actions

No.	Action	Time Scale	2019/20 Progress	2019/20 Conclusions
1.	Build out of Borough Council sites which are allocated, have planning permission or funding	On-going	<p>Completions on BC sites 2019/20:</p> <ul style="list-style-type: none"> Marsh Lane: 53 Lynn Sport: 64 NORA: 13 <p>So, 130 homes completed on BC sites which equates to just over 20% of all completions</p>	Very positive and with the reminder of these sites still to come-forward as well as other such as Columbia Way and Parkway this Action is being met and should remain going forward
2.	Continue to proactively work towards bringing forward the West Winch Growth Area	On-going		The West Winch Growth Area is a long-term strategic housing location and work towards this should continue in a positive and collaborative way
3.	Implement the Actions set out in the Borough Council Custom and Self-Build Action Plan , including providing opportunities for and raising awareness of this method of delivery	On-going	<ul style="list-style-type: none"> A site for 25 C&SB homes at Upwell, allocated in the Local Plan is nearing completion. A further C&SB at Ingoldisthorpe has permission for 12 homes. Numerous small sites have both completed and gained planning permission The BC is exploring options to bring forward two of its sites allocated in the Local Plan as C&SB homes The Local Plan review will seek to encapsulate the BC's positive approach to C&SB 	The approach the BC have adopted with regard C&SB is very positive and this along with the C&SB Action Plan is producing results in terms of actual delivery and further sites coming forward in this way. This could lead to more desirable homes and a faster pace of delivery
4.	Consider reducing the time given to planning permissions in light of the Housing Delivery Test result and future five-year housing land supply	On-going	<ul style="list-style-type: none"> This option as yet has not been fully explored or taken up 	It could be an important tool and thus should remain an Action

No.	Action	Time Scale	2019/20 Progress	2019/20 Conclusions
	positions			
5.	Take decisions according to Local Plan and NPPF to provide clarity, certainty and consistency	On-going	On the whole this has been achieved by the Planning Committee. However, it should be noted that to date a number of applications for sites allocated within the BC's Local Plan have not been approved	This is vital for housing supply and completions as well as ensuring development is sustainable and in the right locations
6.	Continue to provide support for those communities wishing to prepare a Neighbourhood Plan for their area and if appropriate support neighbourhood plan allocations	On-going	Neighbourhood Plan activity with the borough has exploded with approx. 40 Town/Parish Councils involved in them. 6 are made and a number are progressing towards the final stages. The later ones are generally seeking to make allocations such as Sedgford (made), Snettisham (made), Holme (passed exam), Upwell (at exam).	Neighbourhood Plans are vital piece of the planning jigsaw puzzle, offering local communities an opportunity to plan their Area. This Action should remain and more resource should allocate towards supporting them due to the growth/interest in this field
7.	Member Training	On-going	The member training programme for the year was active including external training with regards to the updated NPPF and decision making. Alongside more focused training in-house and updates.	It is important the members are up to speed and aware of change to the planning system and recent case law. As well the quality and speed of decisions of the BC and the local position now and going forward with regard to housing supply and completions
8.	Proactively monitor permissions and completions	On-going	The first HDT touched upon the monitoring process. In recent years this has been completely overhauled and incremental improvement continue to come forward.	It is essential that this continues in such a positive vein, given the focus on housing supply and delivery
9.	Local Plan review. Prepare this in a timely fashion and provide the opportunity for a	Short term (1 -2 Years)	The Local Plan review is broadly progressing in line with the latest adopted Local Development	The Local Plan review is progressing. It is crucial that

No.	Action	Time Scale	2019/20 Progress	2019/20 Conclusions
	balanced portfolio of sites in terms of size, location and Greenfield / brownfield.		Scheme (LDS). Due to the Covid-19 pandemic planning policy officers have been working from home and has progressed the Local Plan review. It now requires Member input and this will be conducted remotely/virtually	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
10.	Produce a new Strategic Housing Marketing Assessment (SHMA)	Short term	This has been commissioned and is nearing completion. Consultants SDH have undertaken a Housing Need Assessment (HNA). A draft has already been published:	A key evidence document required to support the Local Plan review in particular with regard to the type and tenure of homes required to meet the need
11.	Produce a new whole Local Plan viability study	Short term	This will be undertaken shortly following the completion of the HNA	Another important evidence document for the Local Plan review.
12.	Norfolk Strategic Planning Framework - continue to support this and the strategic housing delivery study	Short term	The NSPFW is vital to ensuring a joined up approach to planning across Norfolk and continues to be supported by the BC. In October 2019 the second version was adopted. A further update is underway with the focus on climate change, health, communication and housing delivery	This is considered to be of a high importance and it's continued support should be endorsed and recognised through the BC HDT AP
13.	Local Plan Task Group to consider sites which appear to have stalled (rated red)	Short term	This hasn't occurred as the focus has been on progressing the Local Plan review. Focus could shift towards this once the timetable allows	This will be important going forward and should remain a part of the BC HDT AP. This should realistically be moved to the medium term
14.	Borough Council to consider another phase of	Short term	This has been discussed internally between	This should realistically be

No.	Action	Time Scale	2019/20 Progress	2019/20 Conclusions
	Rural Exception Sites (affordable housing)		Housing Strategy and Planning and will most likely be returned to in the near future	moved to the medium term
15.	Borough Council to carry out its functions with regard to its established housing company and seek to provide further housing within the Borough	Short term	This is occurring see Action 1. This is also starting to involve funding and transformational opportunities that could lead to accelerated construction of new builds, conversations and possibly modern methods of construction through schemes such as: <ul style="list-style-type: none"> • Homes England Accelerated Construction Programme • King's Lynn Heritage Action Zone • Future High Street/ Town Centre Fund 	Remain part of the BC HDT AP
16.	Borough Council to carry out its functions as a Registered Provider and consider direct provision of affordable housing	Short term	This is occurring see Action1 & 16	Remain part of the BC HDT AP
17.	Review the Housing Delivery Test Action Plan	Short term	This has been reviewed in light of the BC's HDT result 2019. It would be good practice to continue this even if the BC passes the HDT	Should absolutely remain an Action
18.	Borough Council to consider delivering more homes – both on own land and consider other options	Medium term (2-5 years)	The BC is considering this. An example of this can be seen with the consultation and planning application which has been submitted with regard the Parkway Site	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
19.	Work across the County with other authorities, as part of the Norfolk Strategic Planning Framework and through any follow up work that arises from the NSPF Housing Delivery Study	Medium term	See Action 12. The Action is very similar to No. 12 this should be amended going forward to encompass the Duty to Cooperate and other neighbouring LPA's in particular Fenland as there is a shared strategic housing allocation in both Local Plans, with the BC element being	Remain part of the BC HDT AP

No.	Action	Time Scale	2019/20 Progress	2019/20 Conclusions
			approx. 550 new homes. Further to this relationships Cambridgeshire and the Combined Authority with regard to Rail and Road upgrades which could facilitate jobs and more housing	
20.	Once the Local Plan review has been adopted commence work on a new Local Plan	Medium term	N/A	Long term, so should remain part of the HDT AP