

King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
Telephone: 01553 616200
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23 June 2020

Dear Member

Local Plan Task Group

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Wednesday, 1st July, 2020 at 11.00 am** in the **Remote Meeting on Zoom and available for the public to view on WestNorfolkBC on You Tube - Zoom and You Tube** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

- 1. Apologies**
- 2. Notes of the Previous Meeting (Pages 3 - 44)**
- 3. Matters Arising**
- 4. Declarations of Interest**

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Members should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting.

- 5. Urgent Business**

To consider any business which, by reason of special circumstances, the Chairman proposes to accept as urgent under Section 100(b)(4)(b) of the

Local Government Act, 1972.

6. Members Present Pursuant to Standing Order 34

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before a decision on that item is taken.

7. Chairman's Correspondence (if any)

8. Local Plan Review - Update on Progress (Page 45)

9. Local Plan Review (2016 - 2036) - Consideration of the Latest Housing Numbers (Pages 46 - 52)

10. Date of Next Meeting

The next meeting of the Task Group will take place on Wednesday 5 August 2020 via Zoom.

To:

Local Plan Task Group: Councillors R Blunt, F Bone, A Bubb, C J Crofts, M de Whalley, C Joyce, J Moriarty, T Parish, S Sandell and D Tyler

Officers: K Evans, A Fradley, A Gomm, P Jermay

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK**LOCAL PLAN TASK GROUP**

**Minutes from the Meeting of the Local Plan Task Group held on
Wednesday, 4th March, 2020 at 11.15 am in the Kempe Room, Town Hall,
Saturday Market Place, King's Lynn PE30 5DQ**

PRESENT:

Councillors R Blunt (Chair), F Bone, A Bubb, C J Crofts, M de Whalley, C Joyce,
J Moriarty, T Parish (Vice Chair), S Sandell and D Tyler

Officers:

Katie Evans, Assistant Planner
Duncan Hall, Assistant Director - Regeneration, Housing and Place
Alex Fradley, Principal Planner (Policy)
Dave Robson, Environmental Health Manager (Environment)

1 APOLOGIES

There were no apologies for absence.

2 NOTES OF THE PREVIOUS MEETING

The notes of the meeting held on 13 February 2020 were agreed as a correct record.

3 MATTERS ARISING

There were no matters arising.

4 DECLARATIONS OF INTEREST

There were no declarations of interest.

5 URGENT BUSINESS

There was no urgent business.

6 MEMBERS PRESENT PURSUANT TO STANDING ORDER 34

Councillor A Ryves for all items.

7 CHAIR'S CORRESPONDENCE

The Chair advised that he had held a sifting meeting with officers to identify the items for today's agenda.

8 **HOMELESSNESS STRATEGY UPDATE FROM D HALL**

The Task Group received a presentation on Homelessness and Housing Supply from the Assistant Director, Regeneration, Housing and Place (copy attached).

The Chair and Officers responded to questions from the Task Group in relation to:

- Care needs and provision in the county.
- Definition of housing with care and mix of tenure required for different levels of care would be included within the detailed policy.
- Social housing.
- Affordable housing supply and link with homelessness.
- Overview of work being undertaken by the Borough Council's Homelessness and Housing Delivery Task Group.
- Market towns.
- The need for rural communities and appropriate support.
- Shared ownership schemes.
- Need for rented accommodation and provision of support.
- Sheltered housing accommodation.
- Options for provision of temporary accommodation.
- Private rented accommodation and level of rent.
- Affordable rented accommodation.
- Affordable market housing.
- Current house builders in the Borough.
- Borough Council developments and potential energy efficient investments within budget, for example, solar panels.
- Exceptions sites.
- Development outside the development boundary.
- Communities within the development boundary.
- Potential development on Brownfield sites.
- Five year land supply.
- NPPF policies – it was noted that a link to the NPPF relating to build the definition of affordable homes, entry level exception sites and exception sites would be forwarded to the Task Group.

The Chair informed Members that the James Wild, MP had received a briefing on affordable housing and homelessness.

The Chair thanked the Assistant Director, Regeneration, Housing and Place for an interesting and informative presentation and invited him to attend a future Task Group meeting when required.

9 **CLIMATE CHANGE - D ROBSON**

The Task Group received a presentation from D Robson, Environmental Health Manager (copy attached). The Environmental Health Manager explained that he had held discussions with the Planning Policy Team when it had been identified that the items listed below could be included in the Local Plan.

- Renewable Energy & Building Standards.
- Transport.
- Tree Planting/Green Habitat.

The Environmental Health Manager and Principal Planner (Policy) responded to questions in relation to:

- Potential sources of renewable energy which could be encouraged for new builds, for example, solar water heating, solar panels, ground source heat pumps, air source heat pumps, biomass boilers (for commercial purposes).
- Cost of renewable energy source to new builds.
- Affordability of houses with renewable energy source.
- Borough Council's approach to climate change.
- Green tariff for renewable electricity.
- Potential for the Borough Council to include a % of renewable energy required for new builds within the Local Plan.
- Design of new builds should allow space for air source pump/battery. Reference was made to the national design guide. It was explained that when a planning application was received the Borough council would set out what the developer was required to do to meet the policies.
- Advantages and benefits of installation of solar panels.
- The 'Merton' Rule – it was explained that this was a prescriptive planning policy that required new developments to generate at least 10% of their energy needs from on-site renewable energy equipment.
- Potential for solar or wind farm allocation in the Local Plan.
- Government consultation in 2019 on Building Regulations which set out 3 options. No response had been received to date.
- Active and green transport – cycling, walking, car share, catching the bus.
- Community Infrastructure Levy – applications could be made for provision of or improvements to a cycle path.
- Air Quality Action Plan.
- DM17 required 1 secure cycle space for each new build – was this considered to be sufficient space?
- King's Lynn Transport Strategy – recommendation could be to expand the current existing cycle provision.
- Adequate provision of cycle paths to be considered when planning permission for new large scale developments.
- Sustainable travel assessment.

- Consider of Park and Bike scheme.
- The Lewes Rule – *‘Applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality.’*
- Potential to encourage a 30 amp cabling to be installed in property for future use.
- Electric vehicle charging points.
- Habitats Regulation Levy potential to increase current £50 fee.
- Provision of open space/identify specific area of land for tree planting.
- Potential policy requiring every household to plant a tree.

The Task Group took a comfort break at 1.28 pm and reconvened at 1.35 pm.

10 **HOUSING DELIVERY TEST RESULTS 2019 AND THE IMPLICATIONS**

The Task Group received a presentation (copy attached) from the Principal Planner (Policy).

The Chair informed Members that he had held a meeting with the Executive Director and the Assistant Director, Companies and Housing Delivery to discuss how to take the project forward in the next five years.

The Principal Planner (Policy) responded to questions relating to:

- Completions per annum.
- Action taken to address reasons why sites had not been delivered. It was noted that an email and questionnaire was sent to each landowner.
- Sites in multiple ownership.
- Sustainable development.
- Need for affordable housing.
- Planning permissions – some referred to the Planning Committee and others dealt with by delegated powers.
- Improvements to infrastructure to attract investment into the Borough to demonstrate it is a good place to live.

11 **FUTURE AGENDA ITEMS**

The following items were identified for a future Task Group Meeting:

- Accessible and Adaptable Homes.
- Update on Gypsies and Travellers.

12 **DATE OF NEXT MEETING**

The next meeting of the Task Group will be held on Wednesday 1 April 2020 at 11.15 am in the Kempe Room, Town Hall, Saturday Market Place.

The meeting closed at 2.09 pm

Homelessness and Housing Supply

Duncan Hall – 4 March 2020

Borough Council of
King's Lynn &
West Norfolk



Homelessness and Rough Sleeping Strategy 2019 -2024

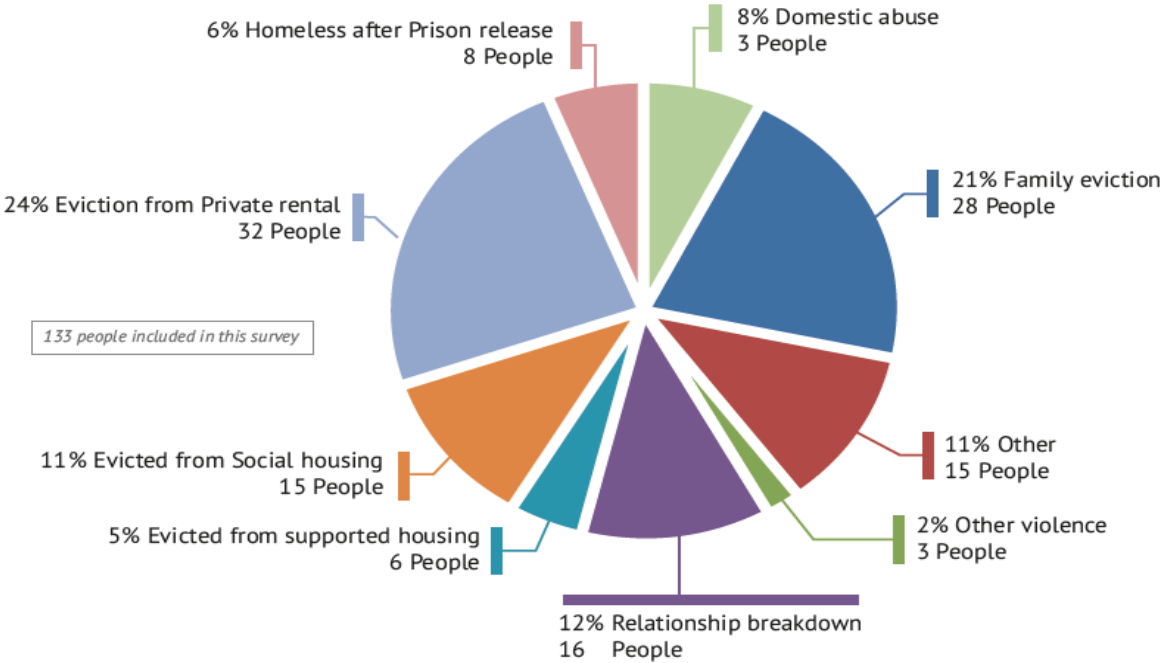
Partners:



Reasons for homelessness

King's Lynn and West Norfolk Q3 2018 - 2019

Reason for approach as homeless or threatened with homelessness



Source: Borough Council of King's Lynn and West Norfolk



Causes of homelessness

Cost of shared room pw	£95
Housing Benefit pw	£55
Shortfall pw	£40
Employment Support Allowance pw	£57.90
Left to live on pw	£17.90

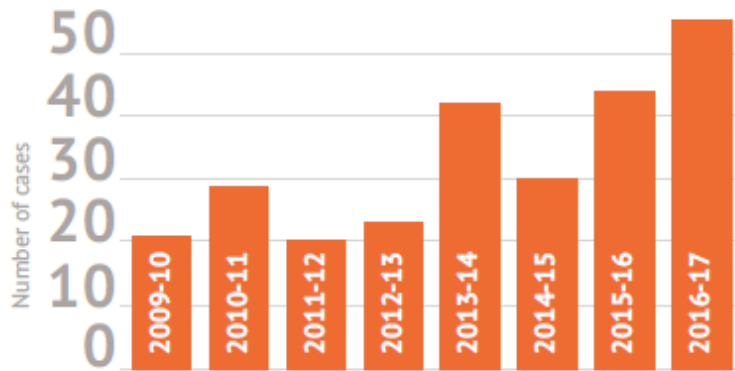
Year	Number of lets
07/08	859
08/09	711
09/10	948
10/11	828
11/12	919
12/13	658
13/14	816
14/15	823
15/16	641
16/17	571
17/18	548
18/19	479

Year	New Build Affordable Housing completions
10/11	157
11/12	148
12/13	109
13/14	27
14/15	60
15/16	73
16/17	28 (net gain of 24)
17/18	29 (net gain 25) 30 RTB= - 5AH units
18/19	61

Measures of homelessness

Graphic 1.7

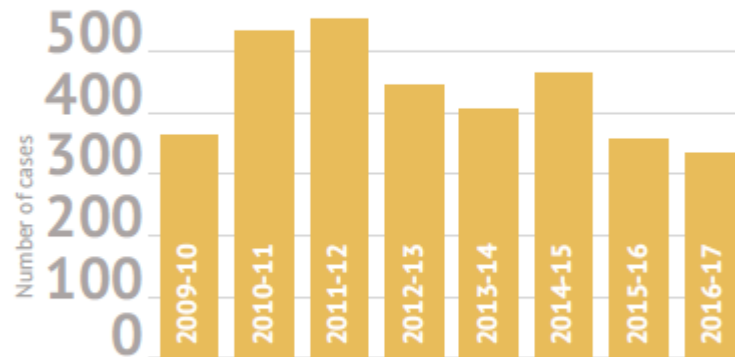
Housed in temporary accommodation King's Lynn & West Norfolk



Source: National Audit Office, Homelessness in England
Visualisation, Published 14 Jun 2017
<https://www.nao.org.uk/other/homelessness-in-england-visualisation/>

Graphic 1.8

Cases of homelessness prevention King's Lynn & West Norfolk



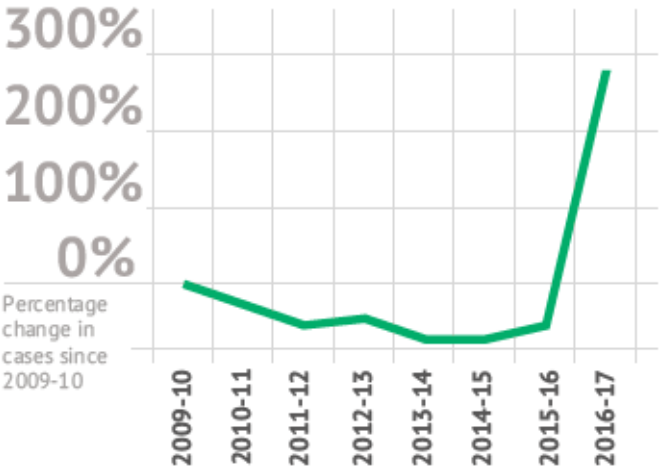
Source: National Audit Office, Homelessness in England
Visualisation, Published 14 Jun 2017
<https://www.nao.org.uk/other/homelessness-in-england-visualisation/>



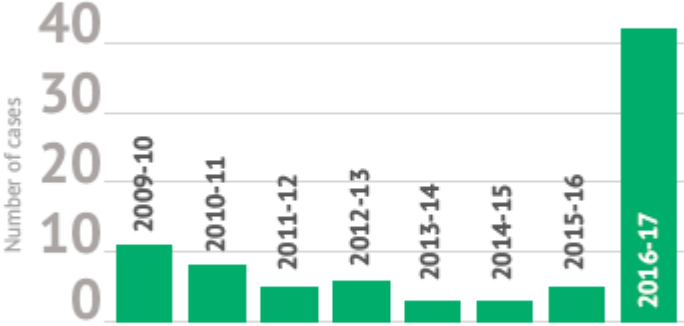
Measures of homelessness

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Graphic 2.2
Percentage change in measures of homelessness since 2010-11
King's Lynn & West Norfolk



Graphic 2.3
Rough Sleepers in King's Lynn & West Norfolk



Source: National Audit Office, Homelessness in England Visualisation, Published 14 Jun 2017
<https://www.nao.org.uk/other/homelessness-in-england-visualisation/>



Indicators of homelessness

Graphic 2.4
On-going record of those rough sleeping, or in danger of rough sleeping

- 9 Rough sleeping on the night of 14th November
- 23 Sofa Surfing
- 16 In accommodation
 - 1 x QEH in patient
 - 2 x in prison
 - 4 x EDAB'S
 - 2 x Housed
 - 4 x Accommodated at Merchants Terrace
 - 1 x Staying with family
 - 1 x Accommodated a Right Tracks
 - 1 x cohabiting with new partner

Source: Borough Council of King's Lynn and West Norfolk/King's Lynn and West Norfolk

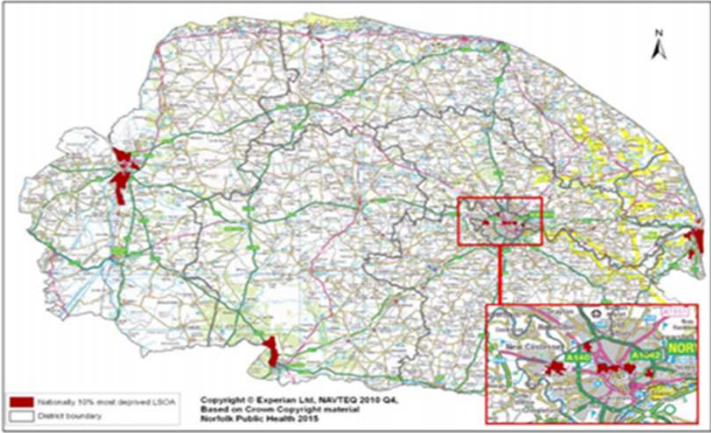


Figure 1 Areas of Norfolk in the 10% most deprived areas nationally (IMD 2010, DCLG)

District	Number of LSOAs in the nationally most deprived 10%	% population living in the nationally most deprived 10%	Population living in the nationally most deprived 10%	Population (ONS 2013 mid-year estimate)
Breckland	1	1.7%	2,273	132,587
Broadland	0	0.0%	0	125,499
Great Yarmouth	13	23.1%	22,572	97,796
King's Lynn and West Norfolk	7	8.5%	12,614	148,758
North Norfolk	0	0.0%	0	102,043
Norwich	8	9.3%	12,649	135,893
South Norfolk	0	0.0%	0	127,570
Norfolk	29	5.8%	50,108	870,146

Table 1 Population in districts of Norfolk living in the most deprived 10% of areas nationally







Rough Sleeping

Who are the Rough Sleeping Community?

- 2/3rd male 1/3 female
- Multiple disadvantage
- Commonly mental health issues
- Commonly addiction problems
- Most often disengaged

New Legislation – Homelessness Reduction Act

- Helping more single homeless
- 30% increase in resources
- 112 days of additional duty
- Fall in main housing duty numbers
- Invested heavily in software to deal with PHP and H-Clic

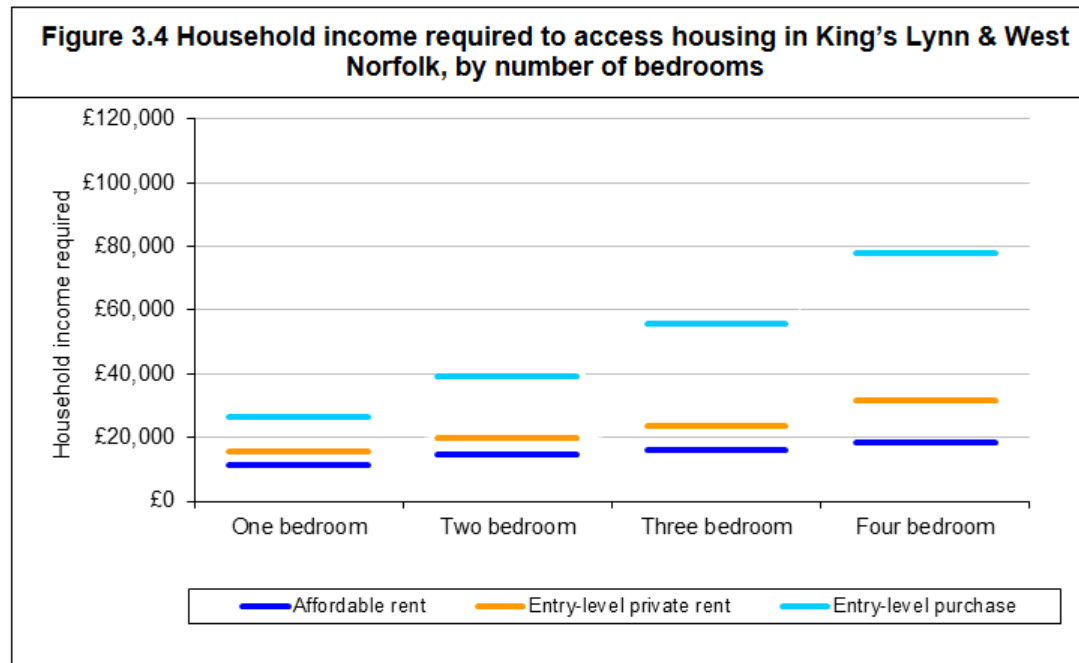


Housing Stock

- the number of dwellings has increased by **2.6%**, **almost 1,950 properties** between 2013 and 2018. In comparison, the dwelling stock in **the East region increased by 4.3%**, whilst the dwelling stock of **England increased by 4.0%**.
- Some **14.8%** of households in King's Lynn & West Norfolk are resident in the **Social Rented** sector (national average 17.2%).
- **16.3%** of households in the Borough live in **private rented** accommodation, compared to 18.7% in the East region and 19.9% across England.
- Between 2011 and 2016 in all areas the private rented sector has increased and the number of owner-occupiers with no mortgage has also grown.



The cost and affordability of housing



Source: Online survey of property prices July 2019; HCA's Statistical Data Return 2018,

Shared Ownership

- 25% equity share on S/O products is cheaper than **market entry rent** in all instances
- The very large gap between market entry rents and market entry purchase in all cases indicates notable potential demand for **part-ownership** products for households in this gap.
- Reduced need for a deposit with shared ownership

Table 3.7 Estimated cost of intermediate housing in King's Lynn & West Norfolk (monthly cost)

<i>Bedrooms</i>	<i>Open market value</i>	<i>Shared Ownership – 40% equity</i>	<i>Shared Ownership – 25% equity</i>	<i>Starter Homes</i>	<i>Shared equity</i>	<i>Entry-level private rent</i>	<i>Entry-level owner-occupation*</i>
One bedroom	£120,000	£388	£346	£447	£456	£460	£431
Two bedrooms	£160,000	£518	£461	£596	£654	£575	£635
Three bedrooms	£225,000	£728	£649	£838	£951	£695	£908
Four bedrooms	£320,000	£1,036	£922	£1,192	£1,387	£925	£1,271

*The monthly cost of entry-level owner-occupation presuming a 30-year repayment mortgage with an interest rate of 3.79%. Source: Online estate agents survey, July 2019

Shared ownership potential

- 3 bed house
- OMV £205K
- 25% share
- 2.75% unsold equity
- £4,500 deposit
- £511 per month

- Typical purchasers
 - Working families
 - Currently private renting in King's Lynn

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3 bedroom terraced house
Sandpiper Way.

Attractive contemporary family home; boasting spacious rooms, high specification kitchen, gas central heating, allocated parking and much more!

Reduced yesterday by Abbots Lettings, King's Lynn

£800 pcm
£185 pw

HIGH SPECIFICATION

Abbots 01553 403109
Local call rate

Email agent

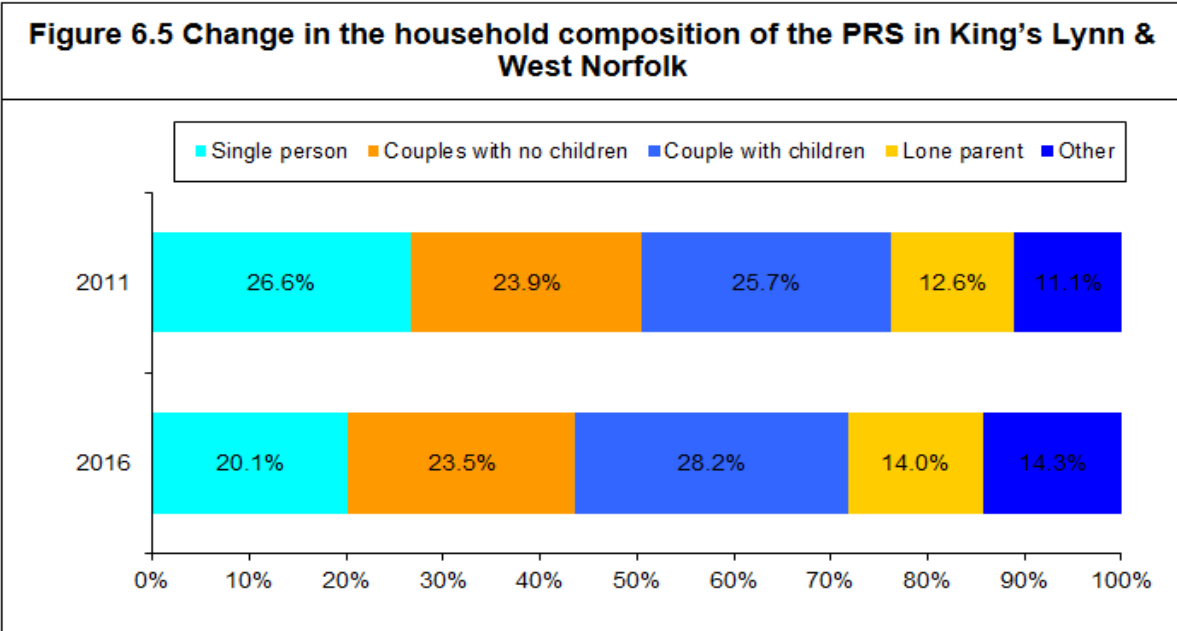


Private Rented Sector (PRS)

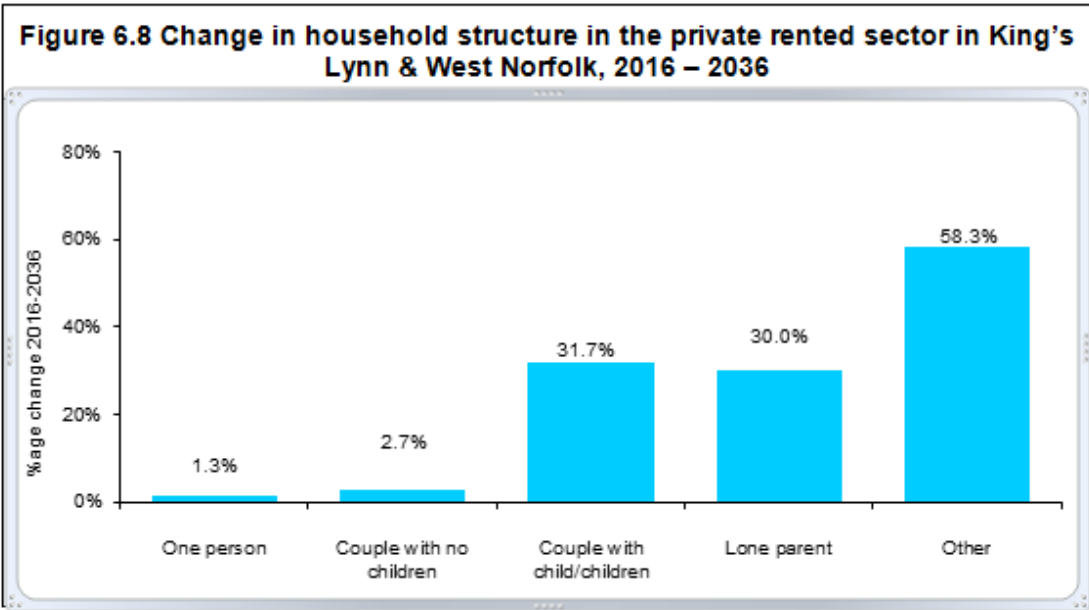
- It increased by 34.2% between 2011-2016 - projected to increase by 21.2% by 2036
- Growth being fuelled by **families and sharing households** at the end of the plan period 43.4% families with children
- Still significant gap between Housing Benefit (LHA rates) & rent costs
- On average 10 years to save enough money when living in PRS for a deposit on a 3 or 4 bed entry level home



Private Rented Sector



Private Rented Sector



Affordability of market housing

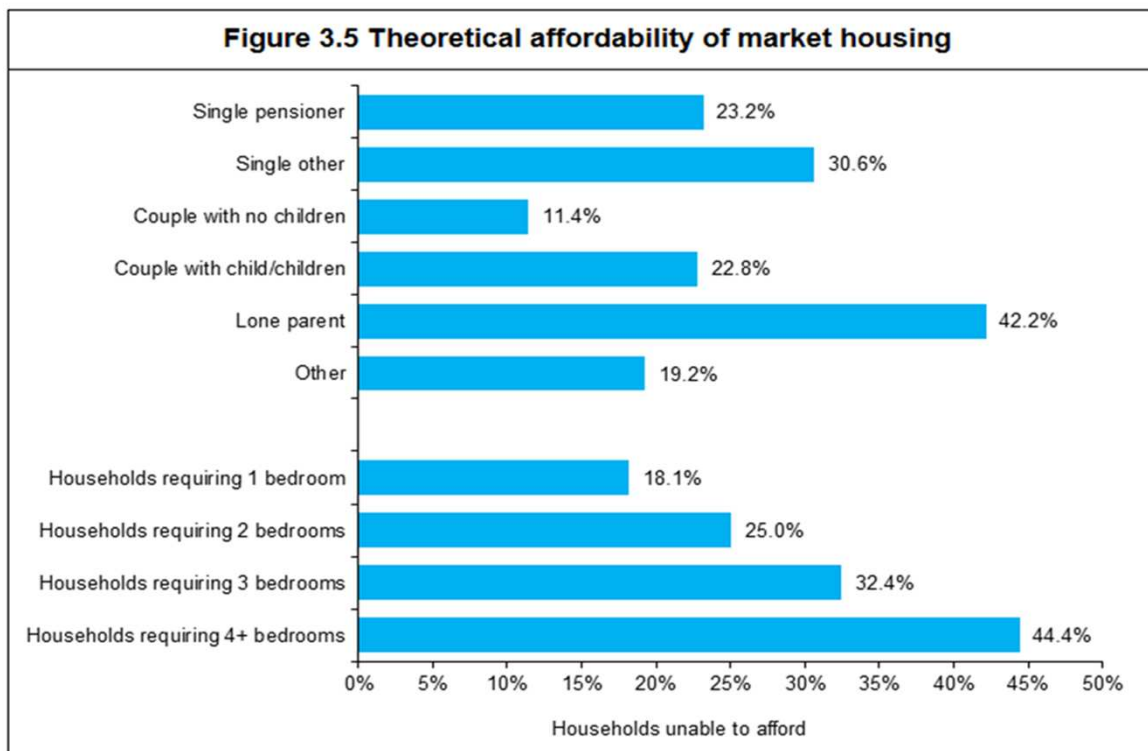
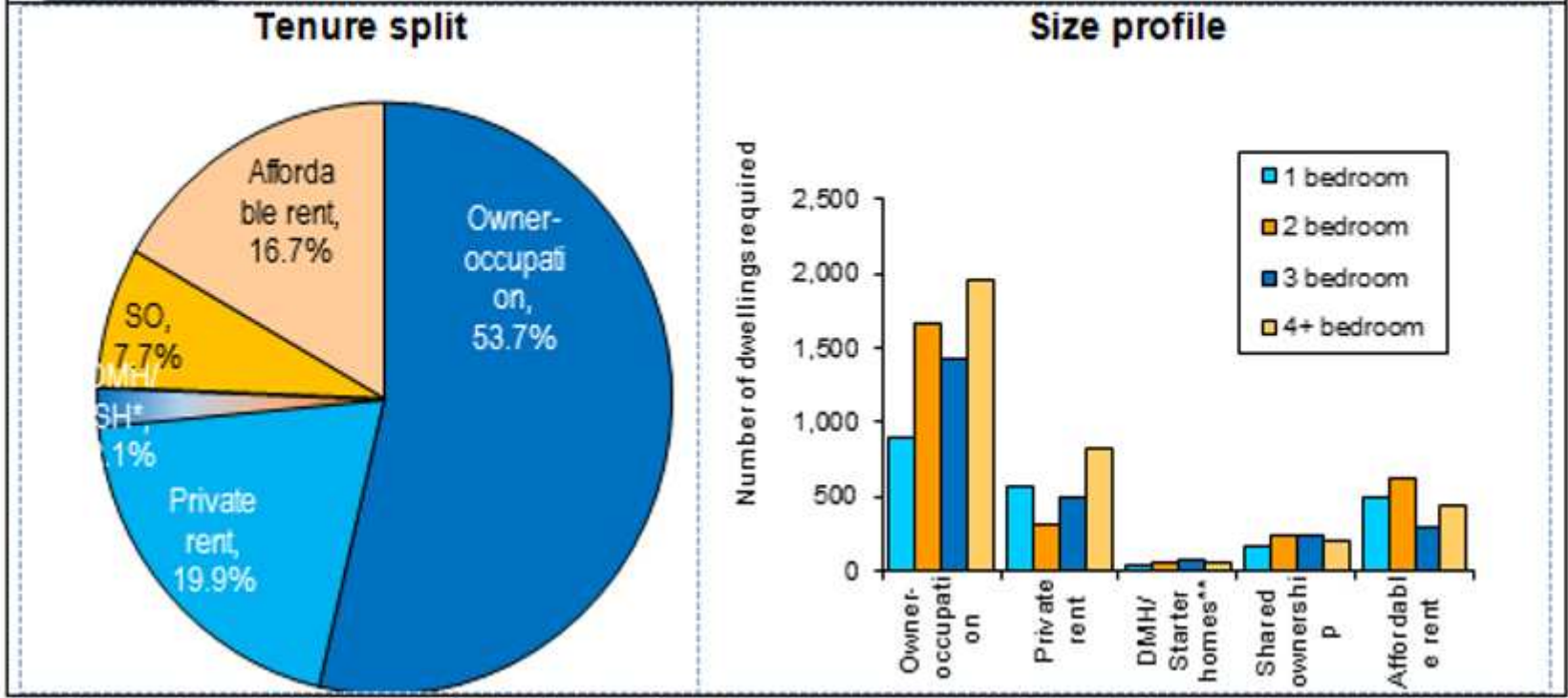


Figure 7.1 Requirement for all new housing in King's Lynn & West Norfolk over the plan period

Chart Area



*Discount market housing/ Starter homes figures represent potential demand rather than a requirement



Policy Implications

- Need to plan for appropriate tenure split
- Consider consequence of the ending of the Help to Buy initiative in 2023
- Encourage/ facilitate more investment in PRS
- Housing policies to enable more shared ownership/ assisted purchase (starter homes/ rent to buy)
- Implications for increase in sharing households (others)
- Plan for more older persons housing – more accessible



Conclusions

- Significant housing need across all tenures
- Significant changes in make up of sector-more PRS & Intermediate products (shared ownership/ rent-to-buy)
- Significant ageing population-long term health & disability increases-potential policy on lifetime homes requirements
- Viability study to follow:
 - To test affordable housing requirements
 - To address climate change policy requirements (adaption & mitigation)

Planning Policy & Climate Change

Renewable Energy & Building Standards

- Should a certain percentage of new builds use renewable energy? E.g. Solar water heating, solar PV, ground source heat pumps, air source heat pumps, biomass boilers.
- Are there provisions/what scope is there for a solar or wind farm allocated land in the local plan?
- New build standards should be on par or better than the future homes standard.

E.g.

- The Merton Rule:
- ‘A prescriptive planning policy that requires new developments to generate at least 10% of their energy needs from on-site renewable energy equipment’.
- Covers residential and commercial.

Transport

- Active and green transport: Cycling, walking, car share, catching the bus.
- Should EV charging points in new builds and commercial centres be a requirement?
- These don’t have to be fast charging but simple charging to give people the opportunity to charge an EV e.g. 30 amp socket.

E.g.

- The Lewes Rule:
- *‘Applications for development should...be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. [Also] Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality.’*

Provision of accessible ¹³ EV charging points for ULEV in New Development	
Flats (developments of 11 or more)	Where flatted development has integrated parking bays (undercroft or parking court) at least one dedicated bay with Fast EV Charging Unit to service the development.
Houses	Where houses are provided with a garage or driveway, one standard EV Charging Unit* per dwelling.
Garages	Where domestic garages are provided, new or replacement, one standard EV Charging Unit** per garage.
Commercial	Where commercial development is proposed with 100 car parking bays or more at least 2% of those bays are to be provided with a Fast EV Charging Unit***.

Tree Planting/Green Habitat

- Should this be included within SIL or Planning policy?
- We propose that major developments must have a certain % of biodiversity net gain.
- A tree tax could be developed further. This money could then be set aside for use in developing and implementing emissions reductions strategies – Section 106 money or SIL?
- Smaller developments (if exempt from SIL) could have to provide X amount to SIL, per property.
- Is there any allocation in the local plan for large areas of land for tree planting? Forests, an arboretum etc.
- We have two streams of tree planting:
 - Tree planting to offset the BCKLWN's own footprint.
 - Tree planting to increase forestry and improve biodiversity etc.

Housing Delivery Test 2019 Results

Alex Fradley
Principal Planner
Planning Policy

Borough Council of
King's Lynn &
West Norfolk



Background

Government requires that Local Planning Authorities have 3 key elements in place, in order to retain control and direct development:

1. An up to date Local Plan
2. A 5 year housing land supply position in excess of 5 years' worth
3. 'Pass' the Housing Delivery Test

Government serious about housing supply & delivery

Local Housing Need (LHN)

Government ambition to build 300,000 homes per year by the mid 2020's

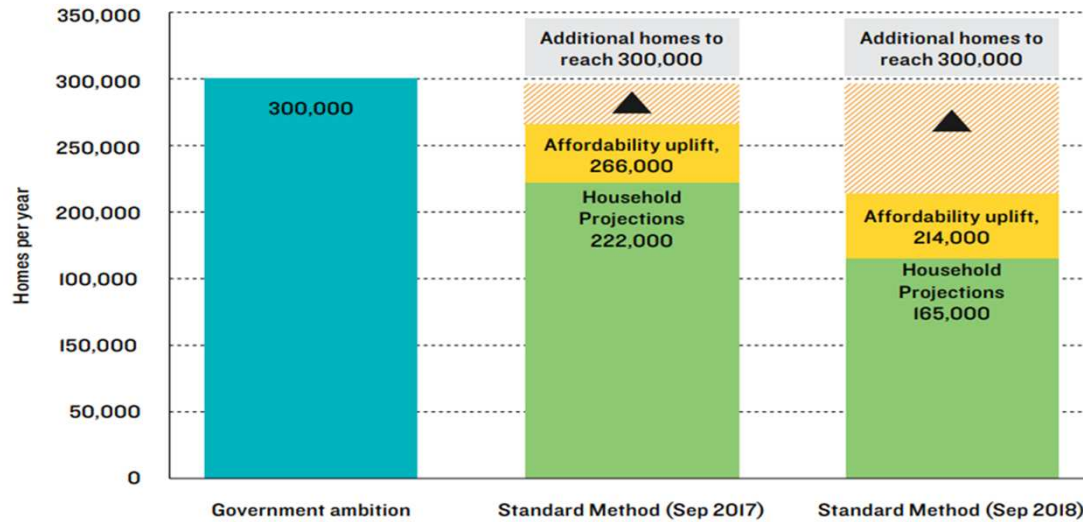
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- Revised NPPF Introduced a Standard Method for calculating LHN. There are Two inputs:
 1. ONS Household Projections
 2. ONS Affordability Ratio

The BCKLWN LHN is 555 new home p.a



Figure I: Homes per year generated by standard method – September 2017 and September 2018



HDT What is it?

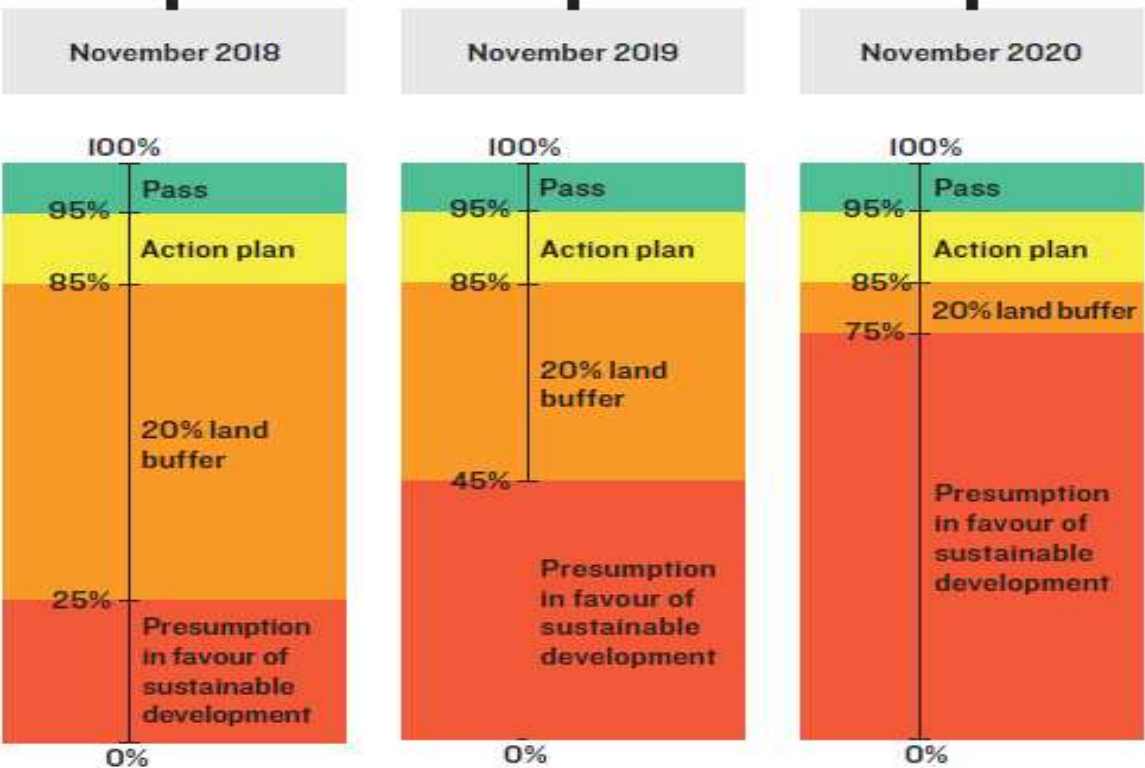
Source: Lichfields analysis

- The HDT is a monitoring tool the Government will use to demonstrate if local areas are building enough homes to meet their housing need
- Measures how many new homes delivered over the past 3 years against how many new homes should have delivered
- Relatively New and Hard Hitting: high thresholds and severe penalties



HDT Levels

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- Results to be published Nov each year (ish!)
- Position/result fixed until the following results published

BCKLWN HDT 2018 Results

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

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- **91 % = Action Plan**
- Need to attempt to **Significantly Boost housing supply & delivery** or else the presumption is engaged

HDT Past Need?

Financial year of three year rolling Housing Delivery test period	Version of the household projections	Annual average taken of years (Table 406)	Year 1	Year 10	Growth	Annual Average
2015/16	2012-based household projections	2015-2025	64,893	69,883	4,990	499
2016/17	2012-based household projections	2016-2026	65,395	70,396	5,001	500
2017/18	2014-based household projections	2017-2027	65,486	69,968	4,482	448
Total						1,447

- LHN looks forward not backwards
- To address this the HDT Rule Book explains
- The LHN figure is phased in



BCKLWN HDT Action Plan

Explores:

- National and local contexts
- Current housing land supply position
- past housing delivery

It:

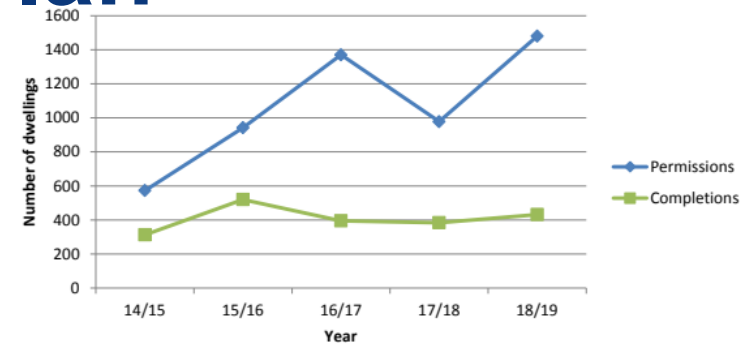
- Outlines the many proactive measure the BC is currently taking to ensure new homes are delivered
- Provides a detailed analysis of the housing trajectory schedule and other data sources

Based upon the above, set out a series of appropriate actions necessary to increase both supply and delivery of new homes in the future

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



Permissions Vs Completions



Actions

Ongoing:

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

Short term (1 -2 Years):

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

Medium term (2 – 5 years):

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

Long term (5 years +):

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



BCKLWN HDT 2019 Results

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

MHCLG published the HDT 2019 results, 13/02/2020. They were due in November, I would guess delayed due to the election etc... As above the BCKLWN result for 2019 is **83%**. This means:

- We have 6 months to update our Action Plan (13/08/2020) including progress on the actions within
- A 20% buffer is now applied in our 5Yr housing land supply calculation. Consequently 8.42 goes down to 7.37 years' worth of supply
- Note this will change as we will re-asses the position based upon the 2019/20 FY
- We also have the publication of financial data and the HHP's this year
- Note that from next year, and onwards, if the result dips below 75% the 'presumption in favour of sustainable development' is engaged
- Indicatively this FY's (2019/20) completions should be higher, however the number of homes required over the 3 year period increases

Going forward

- The Gov. have yet to decide how Local Housing Need (LHN) should be calculated going forward as it is currently based upon the 2014 HHP's (published in 2016). We have since had the 2016 HPP's but have been formally told through the NPPF/PPG to ignore these. What happens when the 2018 HPP's are published this year? NPPF revision?
- 2019/20 on course achieve 555+ completions
- Likely that the HDT Results for 2020 will be higher than 2019
- Could see the need for just the Action Plan



Going forward



Really need all of this in combination:

- BC to continue developing/ building out sites
- Continued BC intervention on sites (NORA, WW, ACP)
- Need to create a planning policy framework that is conducive to ensure a continuous supply of smaller windfall sites
- Need our 2016 SADMP Allocations to not only gain PP but crucially start to be built out

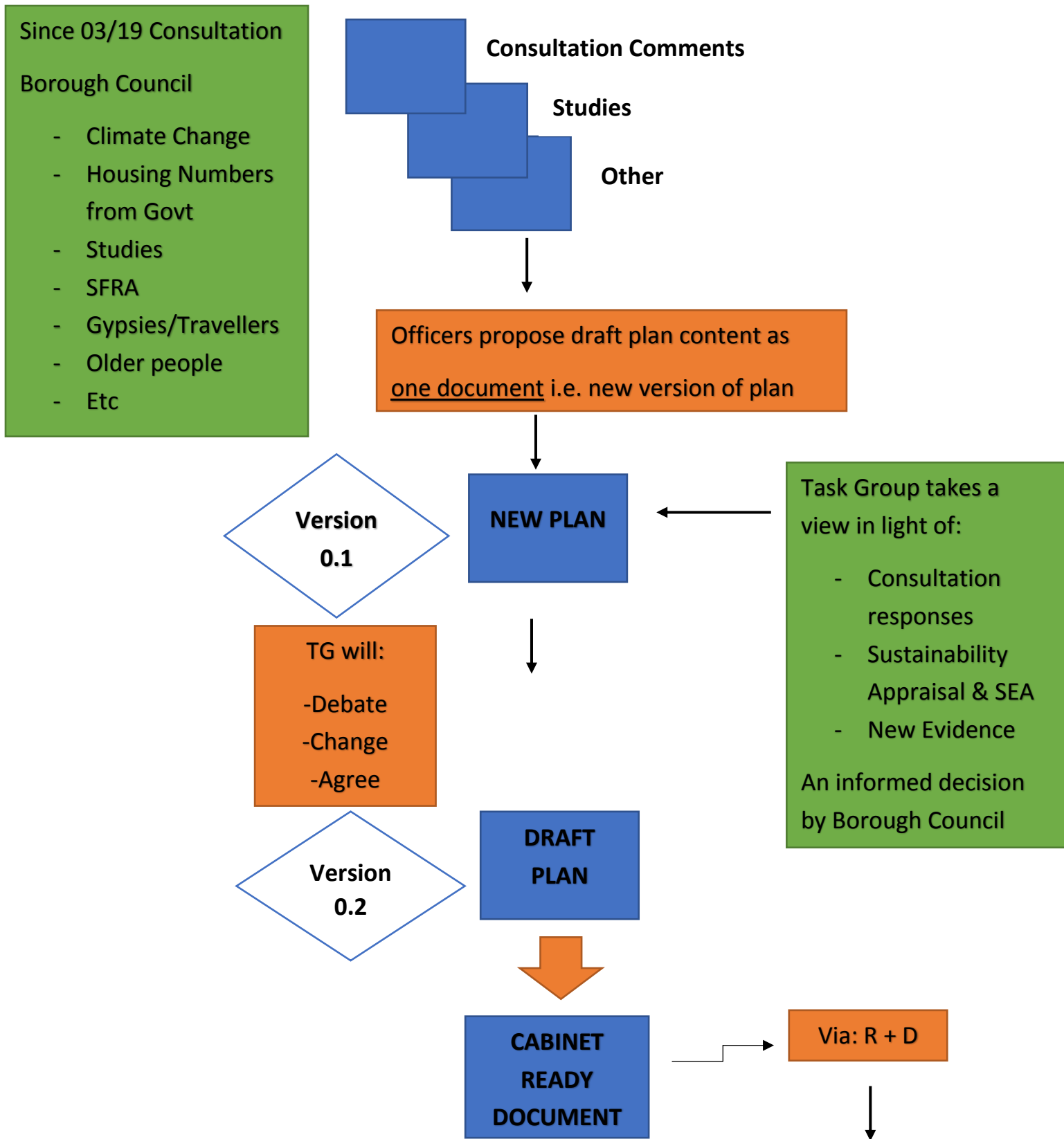
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Borough Council of
King's Lynn &
West Norfolk



Local Plan Preparation/ Progress



Dates

Local Plan Task Groups:	R+D	Target Cabinet	Council
1/7, 5/8, 2/9	1/9	22/9 (Publish 14/9)	Or special meetings?

To meet our LDS Timetable

Borough Council of King's and West Norfolk

Local Plan review (2016 -2036)

Consideration of the Latest Housing Numbers

June 2020

Local Plan review (2016-2036) – Consideration of the Latest Housing Numbers

Introduction

This paper explores the housing need, the current housing delivery and supply (based upon the 2019/20 Housing Trajectory), and what this could mean in terms of the Local Plan review going forward. There are a few sections which cover these elements. This is then all pulled together and presented in a new calculation. Following this some initial conclusions are drawn.

Local Housing Need

The revised National Planning Policy Framework (NPPF) (July 2018) introduced a new standard method for calculating housing need. This is known as Local Housing Need (LHN). This should be the starting point for calculating the housing need for the Borough over the Local Plan period (2016 - 2036).

LHN was introduced in part to make the process more transparent and speed up the plan process; it would also assist Government in reaching their ambition for 300,000 homes to be completed in England each year by the mid 2020's.

The Government has since consulted upon technical changes to the NPPF. This included changes to the LHN calculation, chiefly not to use the latest household projections (2016) published in September 2018 by the Office of National Statistics (ONS), but to use the 2014 Household Projections, published in 2016 by DCLG (Department of Communities and Local Government) (Note this is now the MHCLG / Ministry of Housing, Communities and Local Government).

Following through the latest LHN method results in a LHN figure of 539 new homes required each year for King's Lynn and West Norfolk. This uses the 2014 Household Projections and the 2019 ratio of house price to work place based earnings lower median (published by ONS in April 2020).

The LHN of 539 new dwellings spread over the 20-year plan period (2016 -2036) results in a need of 10,780 dwellings which need to be planned for.

It is worth noting that the LHN need figure is also used as the basis for our five-year housing land supply calculation and going forward the housing delivery test calculation. Please also note the Government have signalled their intention to review and change the methodology through their 'Planning for the future paper':

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

Draft Local Plan review Consultation Numbers

Previously the LHN was 555 and this was the basis for the consultation version of the draft Local Plan in early/mid-2019. The link below provides the full detail (under the section meeting the housing need):

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883059666#section-s1542883059666>

There are three components to this calculation which are now considered worthy of review:

1. The base line data is taken from the 2016/17 housing trajectory. We have since prepared further housing trajectories and the latest is anticipated to be published shortly. This is based upon the 2019/20 financial year.
2. The second being the inclusion of a 15% buffer within the calculation. However, it is likely that the Plan, Supply and Delivery could be benchmarked against the LHN + 15%. This would make a significant challenge even more challenging. With changes to the LHN and the consideration of future windfall development, below, this buffer is not required.
3. The third being the treatment of windfall development moving forward. We know that since the start of the current plan period 2001/02 to 2018/19 the average number of dwellings which complete each and every year is 415. However, to be cautious we reduce this by 25% in order recognise that land is a finite resource. This provides a total of 311 dwelling per year.

It is also worth highlighting that many representations to the Local Plan review have suggested that we are either planning for too many homes or too few. There is also a vast array of comments to sites we have been proposed for allocation both for and against. These will be brought to the Local Plan Task Group for consideration separate from this paper. However, they can all be viewed now via the consultation portal:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019>

Or, the Plan can be navigated via the online interactive mapping tool:

https://www.west-norfolk.gov.uk/homepage/293/draft_local_plan_review_interactive_map

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

Line	Item	Value	Notes
1	<ul style="list-style-type: none"> The BCKLWN current Local Housing Need (LHN) figure is 539 new dwellings per year 	539	<ul style="list-style-type: none"> Government provided calculation/figure, against which our Local Plan, Housing Delivery Test and Five-Year Land Supply is measured. (NB this is subject to change).
2	<ul style="list-style-type: none"> Over the 20-year plan period (2016 -2036) (539 x 20) this results in an overall need for 10,780 new homes 	539 x 20 = 10,780	<ul style="list-style-type: none"> NEED to plan to achieve.
3	<ul style="list-style-type: none"> 2019/20 Housing Trajectory Schedule shows that there are 10,383 dwellings committed i.e. have a permission (Full, Outline, Allocation or ACP funding) 	10,383	
4	<ul style="list-style-type: none"> Since 2016/17 (the start of the plan period) 1,802 dwellings have completed 	1,802	
5	<ul style="list-style-type: none"> Completions & Commitments total: (10,383 + 1,802) = 12,185 	12,185	<ul style="list-style-type: none"> This takes account of sites proposed for de-allocation through the Local Plan review
6	<ul style="list-style-type: none"> Completions & Commitments minus Knights Hill (12,185 – 600) = 11,585 	(12,185 – 600) = 11,585	<ul style="list-style-type: none"> SUPPLY Available (Taking into account the non-approval of SADMP allocation at Knights Hill).
7	<ul style="list-style-type: none"> Minus Boal Quay and associated sites (11,585 – 450) = 11,135 	(11,585 – 450) = 11,135	<ul style="list-style-type: none"> Question Currently over delivery timing and type of development (so, to be safe discounted at this stage)
8	<ul style="list-style-type: none"> Need (10,780) – Supply (11,135) = +355 	10,780 - 11,135 = +355	<ul style="list-style-type: none"> This is the number of dwellings required to meet the min. required LHN Also acknowledges the Knights Hill & Boal Quay etc.. position. So potentially no allocations

Line	Item	Value	Notes
			<u>required</u>
9	<ul style="list-style-type: none"> Emerging Local Plan review draft allocations 2020: Terrington St Clement (76) & Marham (35) = 111 11,135 + 111 = 11,246 	10,780 - 11,246 = +466	
10	<ul style="list-style-type: none"> The latest (2019/20 HT) shows the windfall allowance to be 311 dwellings per year. (Note this includes a 25% discount) 		<ul style="list-style-type: none"> This has been calculated in accordance with the NPPF/PPG and is justified based upon historic trends since 2001/2002
10	<ul style="list-style-type: none"> Windfall allowance of 13 years' worth: 13 x 311 = 4,043 	13 x 311 = 4,043	<ul style="list-style-type: none"> 16 years of the LPr period to run. However, we have to allow a period of 3 years with no allowance giving sufficient time for such sites to come forward, so 13 years of the windfall allowance is calculated.
11	<ul style="list-style-type: none"> Windfall should be seen as flexibility on top of what already has completed and is committed. 	11,246 + 4,043 =15,289 10,780 – 15,289 = +4,509	<ul style="list-style-type: none"> It is important that the annual LHN figure is not inflated to be expressed as a TARGET, since The Borough Council would then be measured against this larger figure, i.e. 539+311=850 p.a. This figure would be seriously unachievable. It should be expressed as 'Flexibility' to assure an Inspector that we have contingency if an element of 'planned' provision does not come forward as envisaged. The supply of windfall may increase or certainly be maintained through the emerging policy LP26 Although not windfall, further homes may be delivered through Neighbourhood Plans as allocations.
12	<u>Summary</u>		Supply

Line	Item	Value	Notes
	<ul style="list-style-type: none"> • Need (539 x 20) = 10,780 • Completions & Commitments (12,185) - Knights Hill (600) & Boal Quay etc (450) = 11,135 • + LPr Allocations (111) = 11,246 • + Windfall (4,043) • Total projected Supply = 15,289 • 10,780 – 15,289 = 4,509 		<p>= 11,135 ('Planned' provision) Need = 10,780</p> <p>Surplus on 'planned' provision = +355</p> <p>-----</p> <p>Projected windfall = 4,043 ('Unplanned' potential)</p> <p>(Surplus) / 'Flexibility' (including windfall) = 4,509</p>

Conclusions

- Government are tasking the Borough Council to meet our LHN. The calculation clearly demonstrates we would be doing this
- The 'surpluses / 'flexibility' acknowledged as a relatively large figure. However, this would mean we are consistent with the NPPF in 'significantly boosting supply'
- There is no 'buffer' written into the Need / Supply or LHN calculation.
- We should guard against over inflation of the LHN figure being, so that Government does not measure us against an inflated figure
- By acknowledging we have a measure of 'flexibility' to ensure that we can meet our 'planned' need we show we have a degree of 'contingency'. This is the approach advocated by the SADMP Inspector. He saw it as very important that the Borough Council was not reliant on an overly precise calculation
- This results in flexibility in the event that planned allocations don't come forward as currently anticipated
- The planning system is very permissive in regard to windfall, historically this has made a significant contribution to completions in the borough and we are simply acknowledging that fact
- The result is potentially no need to make any further housing allocations but cement the ones we have already made in the currently adopted Local Plan and want to take forward
- However, it may be that some of the draft allocations proposed draft Local plan review for a variety of reason we still may want to take forward. This should form part of the discussion when we go on to consider settlement and individual sites
- The majority of Growth is still taking place in the strategic growth corridor (main rail line/ A10)
- It would support localism through communities Neighbourhood Plans
- Indicatively the 2019/20 Housing Trajectory shows we can maintain a supply of housing above the minimum 5 years' worth required
- Indicatively with completion of 591 new dwellings the 2019 Housing Delivery Test Result would be in the approx. 92% meaning that the Action Plan would once more require updating