

**Borough Council of King's and West Norfolk Local
Plan Review (2016 – 2036):**

**Housing and Economic Land Availability
Assessment (HELAA)**

January 2019

Contents

1. Introduction	2
2.Housing Need & the HELAA.....	3
3.Planning Policy Context	4
4.HELAA Methodology.....	6
5.Identification of sites and broad locations.....	8
6.Desktop review and site exclusions.....	10
7.Site Assessment.....	12
8.Site Capacity.....	15
9.Windfall	17
10.Results	19
11.Land for Economic Development.....	24
12.Retail.....	29
13.Conclusion	30
14.Overall Conclusion	34

1. Introduction

- 1.1 The Borough Council of King's Lynn and West Norfolk (BCKLWN) Housing and Economic Land Availability Assessment (HELAA) is a technical study which has been developed to determine the potential housing and economic land supply within the Borough over a 20 year period, from 2016 through to 2036.
- 1.2 This time frame accords with the emerging Local Plan review. The HELAA will inform the Local Plan review's preparation.
- 1.3 It is important to note that the HELAA does not represent policy and will not ultimately determine if a site should be allocated within the Local Plan review or indeed should be granted planning permission. This is the role of the Local Plan and the development management process. Similarly, the non-inclusion of a site does not preclude future development, providing proposals meet planning policy which is in place at the time that a site comes forward.
- 1.4 Assessments are based upon the information available at the time. This includes that which has been submitted by the land owner/promotor/agent in support of a site as part of their overall submissions to the 2016 'Call for Sites and Policy Suggestions' consultation, information provided by those consultees involved, desktop and site visit information, and any information from previous planning applications on the same site for a similar proposal.
- 1.5 It is anticipated that further evidence may be provided in support of sites which would be rejected that could potentially bring them back into contention for allocation purposes. Similarly it is also anticipated that further sites will be proposed for allocation through the Local Plan review preparation and consultation process.
- 1.6 Sites which pass the HELAA appraisal will then be subject to a Sustainability Appraisal (including Strategic Environmental Assessment). Those sites which do not pass the HELAA appraisal will be classed as a 'rejected site'.
- 1.7 Sites have been assessed on an individual basis, rather than the consideration of any cumulative effects or constraints of a settlement or geographic area. This is an area the Sustainability Appraisal will focus upon as sites are considered against each other and cumulative impacts taken into account.
- 1.8 The overall aim of the HELAA is to assess the potential land supply within the Borough and determine if the Borough Council is likely to be able to meet the identified need for housing and for economic growth. It will also support discussions with other authorities through the duty to cooperate if the Borough Council needs assistance in delivering its development need.

2. Housing Need & the HELAA

- 2.1 As mentioned the HELAA's purpose is to consider if the identified housing need for the Borough can be met. Housing need is often referred to as fully, objectively assessed need (FOAN) and as introduced by the revised National Planning Policy Framework (NPPF) (July 2018) Local Housing Need (LHN). The HELAA also identifies where this land may potentially be located.
- 2.2 The NPPF requires local planning authorities to identify their housing need by following the standard method for calculating LHN, which is introduced as part of the revised NPPF and associated Planning practice Guidance (PPG). And to ensure that Local Plans seek to take forward apposite approach to meet the identified need and translate those needs into land provisions to ensure at least these needs are met.
- 2.3 Following the standard method, the current LHN figure for the Borough of King's Lynn and West Norfolk is 470 dwellings per year. Note this uses the latest published data as advocated by the standard methodology. This comprises the 2016 – Based Household Projections in England (September 2018) and the 2017 Median Work Based Affordability Ratio (April 2018) both published by the Office for National Statistics (ONS).
- 2.4 It should however be noted that the Government's 'Technical consultation on updates to national planning policy and guidance' ran from 26 October – 7 December 2018. This contains a proposed revised approach to the standard method for calculating LHN. It advocates the use of the 2014 – Based Household Projections as opposed to the latest published set, the 2016 – Based Household Projections. It also states that 2019 should be the start date for calculation. When these two elements are factored in the LHN for the Borough is 555 dwellings per year.
- 2.5 Although the outcome of the consultation is not known at the time of writing, given that the changes consulted upon to standard method align more close with the Government's ambitions, to deliver 300,000 homes a year in England by the mid 2020's, the higher LHN number is used for the purposes of this HELAA.
- 2.6 The HELAA therefore needs to demonstrate that that there is at least enough dwelling capacity within the Borough to meet the LHN of 11,100 to 2036.

3. Planning Policy Context

- 3.1 The NPPF requires that Local Planning Authorities (LPA's) use their evidence base to ensure that their Local Plan meets their local housing over the plan period, maintain an adequate supply of housing land within their area (5 year housing land supply), and that these houses are delivered (Housing Delivery Test). A vital piece of this is the preparation of a land availability assessment. This should establish realistic assumptions about the availability, suitability and the likely economic viability of land in order to meet the identified need for housing over the plan period.
- 3.2 Planning Practice Guidance (PPG) builds upon this suggesting that LPA's combine their economic and housing assessments to create a HELAA. The PPG goes on to state that the HELAA is a key component of the evidence base which should be used to underpin policies in local plans for housing and economic development.
- 3.3 The PPG is at the time of writing the latest and most up to date guidance for the preparation of a HELAA. This provides a clear methodology, which should be followed. It includes what factors should be considered and what assumptions can be made. It states that a HELAA should:
- identify sites and broad locations with potential for development
 - assess their development potential
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability)
- 3.4 It also provides details with regard to windfall sites and assumptions which can be made as to their contribution towards the housing land supply.
- 3.5 Finally it provides details of what to do should the results of a HELAA demonstrate that the development needs of the Borough cannot be met over the plan period. In such a situation it advises that plan makers revisit the assessment on revised assumptions, such as assumptions of development potential on particular sites. If following this review there are still insufficient sites then it will be necessary to investigate how this shortfall can be planned for and undertake discussions through the duty to cooperate to assess if there is sufficient capacity in neighbouring areas to accommodate additional growth.
- 3.6 The HELAA aims to provide a realistic number of dwellings that each site can potentially provide by assessing each site in order to determine whether it is suitable, available and achievable for housing. It also indicates the timescales for their delivery.
- 3.7 A Link to the planning practice guidance HELAA section is provided below:

<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

3.8 The BCKLWN Local Plan currently comprises the Core Strategy (CS) (adopted 2011) and the Site Allocations and Development Management Policies Plan (SADMP) (adopted 2016).

3.9 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.

3.10 The SADMP gives effect to and compliments the CS. This is done so through the provision of land use 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.

3.11 The plan period covered by the Local Plan is from 2001 through to 2026.

4. HELAA Methodology

4.1 The HELAA Methodology which is employed has been prepared in accordance with the NPPF and the PPG, as discussed in the previous sections. This methodology has been developed by all of the Norfolk Local Planning Authorities (listed below) as part of the duty to cooperate, through the housing working group of the Norfolk Strategic Planning Framework (NSPF).

- Breckland Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Norwich City Council
- North Norfolk District Council
- Borough Council of King's Lynn and West Norfolk
- South Norfolk Council

4.2 Using a common methodology should ensure that each planning authority prepares its HELAA in a consistent way. The methodology has been through public consultation in 2016 and therefore the final agreed HELAA methodology has been informed by key stakeholders. Details of this consultation can be viewed via North Norfolk District Council's website, for ease a direct link to this is provided below:

<https://www.north-norfolk.gov.uk/tasks/planning-policy/housing-and-economic-land-availability-assessment-helaa/>

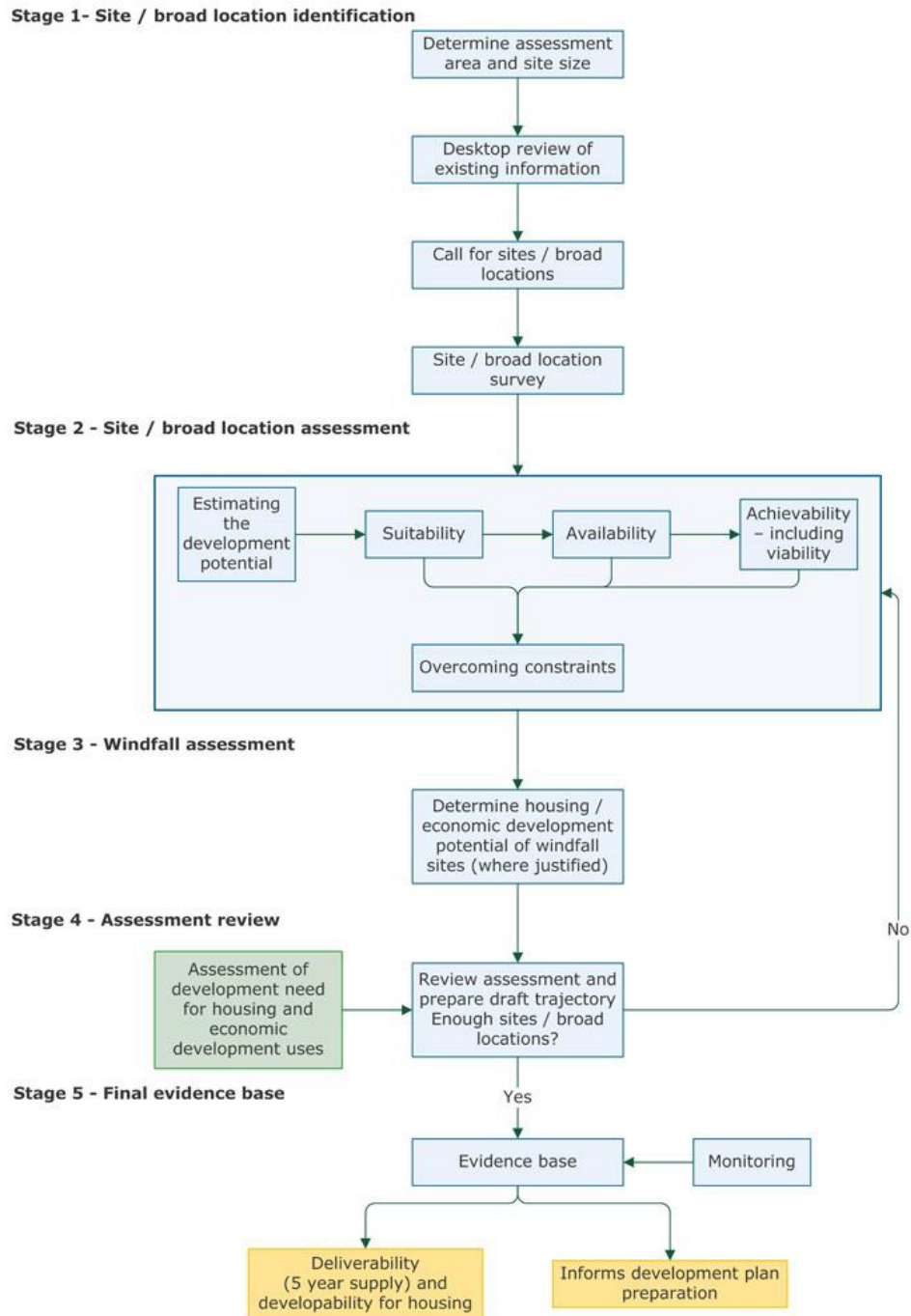
4.3 The agreed HELAA Methodology and assumptions can be viewed in full via the link below:

https://www.west-norfolk.gov.uk/info/20216/local_plan_review_2016_-_2036/630/local_plan_review_call_for_sites

4.4 A summary of this is provided as a figure on the next page.

Figure 1 - Flowchart showing the HELAA Methodology

Source: PPG (Para ID 3-006-20140306)



5. Identification of sites and broad locations

5.1 This HELAA has been prepared based upon sites from the following sources:

- Sites with planning permission for housing or economic uses
- Sites which are allocated within the existing Local Plan (CS 2011 & SADMP 2016)
- Sites submitted through the Call for Sites and Policy Suggestions consultation (17 Oct - 28 Nov 2016)
- Consideration of the contribution to housing supply from windfall sites going forward
- Made Neighbourhood Plans. There are currently five within the borough, however only one allocates land for housing purposes (Snettisham Neighbourhood Plan)

5.2 Note sites owned by the BCKLWN have been submitted as part of the 2016 consultation and these have been considered and assessed accordingly. Sources looked at which are considered not suitable at this time:

- Emerging Neighbourhood Plans. There are a number of these within the Borough, however none, at the time of writing, have reached an advanced stage

5.3 Should assessment of these sources of sites result in an insufficient capacity being identified, then the following further sources will be explored:

- Previous 2008 / 2010 Strategic Housing Land Availability Assessment (SHLAA) & 2014 HELAA. Given the time which has passed the majority of the sites assessed have either gained planning permission, have been allocated within the Local Plan or have been submitted for further consideration in the Local Plan review Call for Sites and Policy Suggestions consultation
- Sites with planning applications which have been refused or withdrawn
- Vacant and derelict land / buildings, and underused land identified from maps and local knowledge
- Land / premise currently for sale

5.4 Through this identification process these sources have provided 1,531 sites. This broken down as follows:

Source	Number of Sites
Planning Permission (2016/17 Housing Trajectory)	896
Local Plan Allocations (including those with planning permission)	94
Call for Sites and Policy Suggestions Consultation	540
Neighbourhood Plan Allocations	1
Windfall	Not expressed as number of sites but dwellings
Total	1,531

6. Desktop review and site exclusions

6.1 An initial desktop review of those sites identified was conducted in line with the PPG. So sites were excluded from the assessment where no feasible development potential can be demonstrated due to the presence of overwhelming constraints for the foreseeable future.

6.2 Sites have been excluded from further capacity assessment in this HELAA, in accordance with the agreed methodology, where they are:

- within Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites (including potential SPAs, possible SACs, and proposed Ramsar sites) or within Sites of Special Scientific Interest, National Nature Reserves and Ancient Woodland. European legislation and/or the National Planning Policy Framework prohibit development affecting these sites and development within the designation is likely to result in direct loss
- within Flood Zone 3b
- within the area of Scheduled Ancient Monuments or Ancient Woodlands; on Statutory Allotments
- within Locally Designated Green Spaces, including Designated Village Greens and Common Land
- at risk from coastal erosion

6.3 In addition to this, and in line with the agreed methodology, the assessment focuses on sites which are capable of delivering 5 or more dwellings, or are at least 0.25 hectares in size and which are located within or immediately adjacent to development boundaries of settlements identified for larger scale growth within the BCKLWN adopted Local Plan and Settlement Hierarchy. So sites at King's Lynn, the Main Towns, Key Rural Service Centres and Rural Villages were assessed, whereas those located at Smaller Villages and Hamlets, and the countryside were not. Adjacent to development boundaries we have expressed as within 25m of a development boundary, adjacent to an existing Local Plan Allocation or next to a submitted site which is adjacent to the development boundary or an allocation.

6.4 If this HELAA indicates that there are not sufficient dwellings to meet the housing need of the Borough than the assumptions in paragraph 6.3 above will be revisited.

6.5 A number of sites had been submitted multiple times, only one submission on one site for the same use was considered. Likewise, some sites overlapped each other and this has been taken into account when estimated the dwelling capacity. Those sites that are already allocated within the Local Plan, which had been submitted once more in support of the allocation, were also discounted.

6.6 This resulted in 210 sites being removed from the assessment, leaving 330 sites to be fully appraised in stage 2. The table below provides a summary of this. The details of the sites and why they were removed from further assessment can be viewed along with mapping of these sites as Appendix 2. Clearly a site could be constrained by more than one factor.

Source	Number of Sites
Total no. of Call for Sites Submissions	540
Total no. of duplicate Call for Sites Submissions	15
Absolute Constraints	195
SPA, SAC's, Ramsar, SSSI	2
Scheduled Ancient Monuments and Ancient Woodlands	0
Within Flood Zone 3b	3
Local Designated Green Space	0
Within area at risk to coastal erosion	0
Sites below the threshold	43
Sites not adjacent to development boundary	172
Sites already allocated in Local Plan	8
Sites at a smaller village and hamlet or within the countryside	60
Total no. of sites constrained or duplicate	210
Total no. of sites assessed in HELAA Stage 2	330

7. Site Assessment

- 7.1 Stage 2 of the assessment process involved assessing whether a site was 'suitable' for the type of development proposed; 'available' based on the best information at hand and when it is expected that the site would be developed, i.e. is it 'achievable'. This is essentially a high level judgement about the economic viability and deliverability of the site.
- 7.2 A judgement on this was reached based upon, information submitted by the site owner/agent/promotor in support of their site at the Call for Sites and Policy Suggestion consultation stage, previous information on the site if a planning application has been made, GIS, where appropriate sites visits, and previous studies such the Sustainability Appraisal which supported the Local Plan, the viability study in support of the Local Plan and the Viability study which supported the CIL (community infrastructure levy).
- 7.3 This information was then used to ascertain whether a site was 'deliverable' (a realistic prospect that it will be delivered within 5 years) or 'developable' (available for years 6-10 or where possible for sites unlikely to be developed for 11 years or more).
- 7.4 To assess the suitability of sites a 'red', 'amber' 'green' (RAG) approach was applied to assessing the various constraints and potential impacts which might affect development. Some sites will have impacts and constraints which are insurmountable and thus undermine the suitability of development. Other sites will have impacts and constraints which are surmountable; however, they may be costly to overcome and have an impact on the achievability of development. Those sites judged to be red at this stage were ruled out as part of the overall capacity calculation. Those sites shown as amber and green are considered to be suitable.
- 7.5 The types of constraint and impact listed below where considered in terms of assessing suitability:

Constraints

- Access to Site
- Access to Local Services & Facilities
- Utilities Capacity
- Utilities Infrastructure
- Contamination & Ground stability
- Flood Risk
- Coastal Change

- Market Attractiveness

Impacts

- Nationally & Locally Significant Landscapes
- Townscape
- Biodiversity & Geodiversity
- Historic Environment
- Open Space / Green Infrastructure
- Transport and Roads
- Compatibility with Neighbouring / Adjoining Uses

7.6 As per the methodology the following bodies/organisations were consulted and their comments assisted in appraising the sites (NCC = Norfolk County Council):

- Highways England
- Historic England
- Natural England
- The Environment Agency
- Anglian Water
- Norfolk Wildlife Trust
- NCC as the Local Highway Authority
- NCC Historic Environmental Services
- NCC Green Infrastructure and Landscape team
- NCC as the Lead Local Flood Authority
- NCC Minerals and Waste
- BCKLWN Environmental Protection team

7.7 Generally sites are considered to be available based upon information at the time of assessment. Those sites which have planning permission or an allocation within the Local Plan are considered available. Those sites which were submitted for consideration in the Local Plan review process through the Call for Sites and Policy Suggestions consultation (2016) were asked to provide such detail.

7.8 Sites have been considered achievable where it is judged there is a reasonable prospect that development could occur on the site over the plan period. This is essentially an initial high level judgement about the economic viability of the site and market attractiveness of its location in respects to property markets and any abnormal constraints on the site. Again such detailed information was requested at the Call for Sites stage. Those sites with planning permission and the Local Plan allocations were asked similar questions, most recently during the formulation of the 2016/17 Housing Trajectory and five year housing land supply calculation, published in June 2017.

7.9 To ensure a consistent and credible approach with regard to market attractiveness the location of the site was taken and assessed against broadly which CIL (Community Infrastructure Levy) charging zone it currently resides within.

7.10 A key determinant of viability is usually a high level economic viability assessment of the site and or typical typologies. This was most recently carried out in support of the Local Plan: Site Allocations and Development Management Policies Plan (adopted in 2016) viability assessment in 2015 and a viability assessment undertaken in 2016 to support the implementation of a CIL. This looked at a range of actual sites coming forward for allocation and modelled typologies based upon the type of sites likely to come forward informed by the emerging Local Plan at that time, planning permissions and the previous SHLAA and HELAA.

7.11 It is therefore likely that this HELAA will form part of the basis of further and more detailed site assessment to inform the emerging Local Plan review including an assessment of viability which will be undertaken as part of the whole Plan wide viability assessment for the Local Plan review.

7.12 Full details of the individual site assessment and mapping are contained with Appendix 1.

8. Site Capacity

- 8.1 The NPPF (para. 47) states that local planning authorities should set out their own approach to housing density to reflect local circumstances. Current Government guidance, at the time of writing, on density is provided within the PPG (Paragraph: 017 Reference ID: 3-017-20140306 Revision date: 06 03 2014), this states that development potential should be guided by existing or emerging policy on density.
- 8.2 The BCKLWN current Local Plan does not contain a specific policy for density, nor is it the intention for the emerging Local Plan review to introduce one. However, in line with the guidance previously a modelled approach has been applied, albeit not rigidly, and it is considered appropriate to carry this forward.
- 8.3 The approach to density with regard to the current Local Plan residential site allocations sought to combine a modelled approach with practical considerations from site based analysis. This modelled approach was used throughout preparation of the Local Plan for consistency. This included the formulation of two SHLAA's and one HELAA.
- 8.4 The first element of the modelling takes the gross area of the site and calculates the net developable site area, as detailed below:

Gross site area (hectare)	Net developable area
Less than 0.4 ha	100% of developable area
0.4 ha to 2 ha	90% of developable area
Sites over 2 ha	75% of developable area

- 8.5 This provides the net developable area; the size of the site determines the percentage of its area that will be developable for housing, it makes assumptions in terms of constraints and infrastructure (including roads and open space for example) for each site.
- 8.6 The second element is the density multiplier. This provides a density for sites based upon their geographical location and therefore tier within the Settlement Hierarchy, as detailed in Policy CS02 of the Local Plan, this can be seen over the page:

Location	Density Multiplier (dwellings per ha)
King's Lynn (Sub Regional Centre)	39
Downham Market, Hunstanton and Wisbech Fringe (Main Town)	36
Key Rural Service Centres	24
Rural Villages	24

8.7 The net developable area is then multiplied by the relevant density figure to give an overall dwelling capacity of a site. This approach enables a calculation of potential dwelling capacity for each site to be made with an element of consistency.

9. Windfall

- 9.1 Windfall sites are sites which have not been specifically identified as part of the Local Plan. The term covers sites that have unexpectedly become available. They can be both small (1 - 9 dwellings) and large sites (10 + dwellings).
- 9.2 Windfall sites have provided an important source of development across the Borough in the past and are expected to continue to contribute to the supply in the future.
- 9.3 Indeed the Local Plan states that not all growth will be delivered through the site allocations, whilst part will be made up on sites with existing planning permissions, other sites which currently do not have planning permission will come forward, these unallocated sites are known as windfall sites.
- 9.4 Allowances are made for windfall from large and small sites within the BCKLWN five year housing land supply calculation. This is based on evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The allowances are realistic, taking account of historic windfall delivery rates.
- 9.5 To avoid double counting of windfalls the Borough Council suggests that it would be reasonable for the windfall allowance only to be applied from year 4 onwards. This means that in the first 5 year period, the windfall allowance is not considered within years 1, 2 or 3, but is for years 4 and 5. The rate is also discounted by 25% recognising that land is a finite resource.
- 9.6 It is also important to understand that with the exception of King's Lynn Town all of the Local Plan allocations are made outside of the current development boundaries, therefore still enabling land within the development boundaries to come forward for development as windfall. King's Lynn is by far the largest urban area within the Borough, it is therefore considered that there is still sufficient area within the existing development boundary of King's Lynn which could be developed or redeveloped thus enabling windfall sites to occur at this location as well.
- 9.7 The windfall allowance in the latest published appraisal (based upon the 2016/17 housing trajectory, June 2017) is 238 dwelling per year. This is broken down to 139 dwelling per year on large sites and 99 dwellings per year on small sites.
- 9.8 The SADMP, section D page 75, contains a windfall allowance of 2,886 dwellings over the period (2013 -2026). Removing the first 3 years as proposed, in the above suggestion, would result in an over allowance within the Plan of 288 dwellings per year. Given that the latest data and appraisal of the windfall situation is the five year housing land supply work, it is this which is proposed to be carried forward and used within the HELAA.

9.9 The vast majority of sites which have been proposed for consideration within the Local Plan review process (through the Call for sites and Policy Suggestions consultation) are located outside of existing settlement boundaries and would, normally, require allocation within the Local Plan or a Neighbourhood Plan in order to come forward therefore they would not constitute a windfall site. Those sites which have been proposed that have planning permission have been discounted from the dwelling contribution assessment on the individual site appraisal forms as they will be included within the housing trajectory (as site with planning permission) and therefore any land supply calculations. This should ensure that sites and their dwelling capacity are not double counted.

10. Results

- 10.1 The HELAA initially assessed a total of 540 sites which were submitted for consideration through the call for sites process. 210 of these sites did not pass stage 1 of the assessment. 330 sites were assessed in stage 2 in terms of each site's potential housing capacity and delivery. Of these 181 sites were considered to be unsuitable due to identified constraints / barriers to delivery, which based upon current information was difficult to suggest how these could be overcome.
- 10.2 This means that 149 sites are considered to potentially contribute towards the dwelling capacity of the Borough. These 149 sites could potentially provide a total dwelling capacity of 7,938.
- 10.3 In addition to these sites, sites with planning permission and sites which are allocated within the Local Plan (some of which benefit from planning permission) contribute to the existing land supply. As discussed in the previous section, windfall sites although not given a site number are anticipated to contribute toward the supply of housing within the Borough going forward.
- 10.4 The West Winch Growth Area is a strategic allocation which forms part of the BCKLWN Local Plan. This is allocated for at least 1,600 dwellings in the current plan period to 2026, and at least a further 1,900 dwellings in the fullness of time (a total of at least 3,500 dwellings – later work through the Infrastructure Delivery Plan actually suggests the total will be around the 4,000 mark). In the 2016/17 housing trajectory 2,500 dwellings are accounted for and reflected in the SADMP Allocations section in the results table on the following page. Therefore there is at least a further 1,000 dwellings which could be added to the identified supply. For ease this has been split over the 10 -15 and 15-20 time periods equally.
- 10.5 The current Local Plan allocations are all expressed as 'at least x' number of dwellings. This offers a degree of flexibility in that sites have the potential to deliver a higher number than the minimum number stated within the relevant policy (subject to consistency with local and national policies). The numbers used within this HELAA for the allocations are those taken from the 2016/17 housing trajectory, this is based upon what is actually coming forward. This shows an additional 725 dwellings coming forward on the allocated sites. If this trend continues, albeit the larger sites are already coming forward, there is the potential for higher dwelling numbers to be achieved. However, this has not been factored in, as this would be a prediction rather than a reflection of what is actually occurring.

10.6 The results table below provides a numerical breakdown of, where possible, the sites and the dwelling numbers which have been identified and illustrates which time period that they are likely to come forward within. Please note that larger sites will contribute housing supply in multiple time bands.

Results Table

Housing Supply Source	0 - 5 years		5 - 10 years		10 - 15 years		15 - 20 years	
	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings	Sites	Dwellings
HELAA Sites	133	5,207	18	1,630	10	864	1	237
Extant consents on unallocated sites (10+)	43	1,326	7	190	1	11		
Extant unallocated sites (5-9) units	54	344	5	24				
Extant consents for small sites (1-4 units)	790	907						
Permissions granted subject to S106	1	50						
SADMP 2016 Allocations	83	3,045	22	3,063	7	1,825		
West Winch Growth Area	Inc. above	Inc. above	Inc. above	Inc. above	Inc. above	Inc. above + 500	1	500
Neighbourhood Plan Allocations	1	40						
Windfall - large sites 10+ (139 p.a. years 4 & 5 only)		278		695		695		695
Windfall - small sites (99 p.a. years 4 and 5 only)		198		495		495		495
Total Identified Housing Supply		11,395		6,097		4,390		1,927

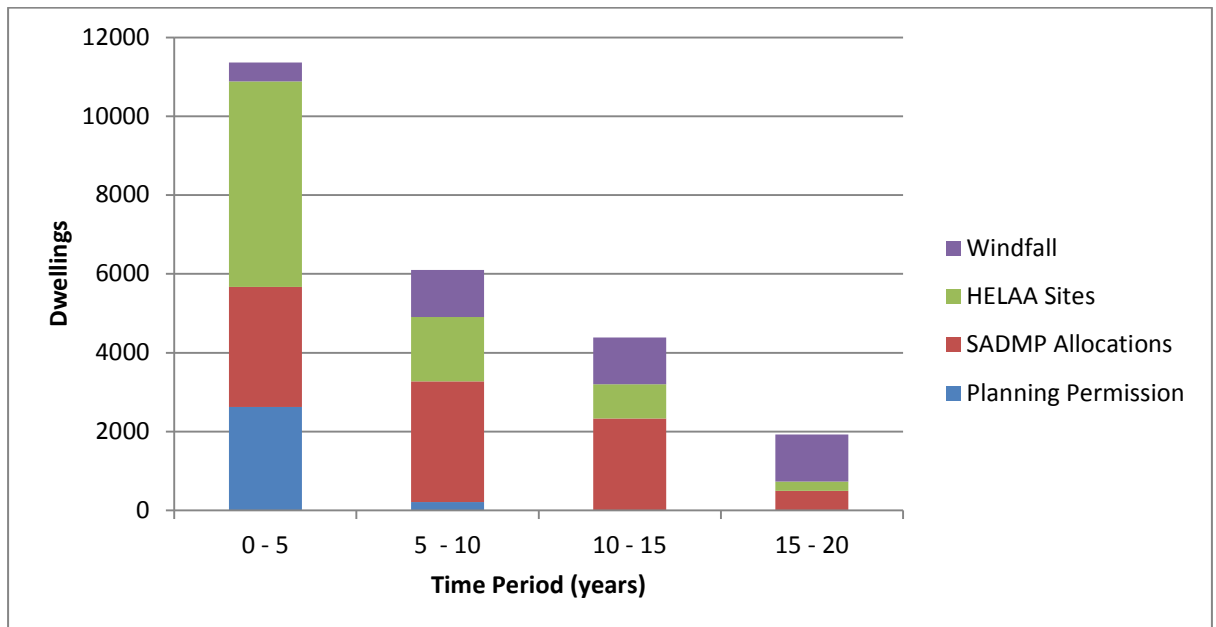
10.7 The table below provides a condensed summary of the results table in terms of dwellings, the time period and housing source. In total 23,809 dwellings have been identified over a twenty year period.

Summary Results Table

	0 - 5	5 - 10	10 - 15	15 - 20	Total
Planning Permission	2,627	214	11	0	2,852
SADMP Allocations	3,045	3,063	2,325	500	8,933
NP Allocations	40	0	0	0	40
HELAA Sites	5,207	1,630	864	237	7,938
Windfall	476	1,190	1,190	1,190	4,046
Total	11,395	6,097	4,390	1,927	23,809

10.8 The results have been plotted, below, to provide an indicative housing trajectory (please note that the contribution from adopted neighbourhood plans isn't shown in the trajectory below as the level of contribution is relatively small at the scale shown).

2018 HELAA Indicative Housing Trajectory



10.9 The table below illustrates the geographic distribution of the sites and dwellings assessed through the HELAA and considered potentially suitable, which were submitted via the Call for Sites and Policy Suggestions consultation.

Geographic Distribution of Dwellings & Sites

Settlement	Dwellings	Sites
Brancaster	30	1
Burnham Market	88	4
Castle Acre	28	2
Clenchwarton	450	7
Denver	132	1
Dersingham	37	1
Docking	265	5
Downham Market	2,448	7
East Rudham	10	1
East Winch	23	3
Emneth	399	10
Fincham	60	2
Gayton	51	3
Great Massingham	76	3
Grimston	93	4
Harpley	20	2
Heacham	645	12
Hilgay	65	3
Hunstanton	13	1
Ingoldisthorpe	106	4
King's Lynn	60	1
Marham	21	1
Marshland St James	162	6
Middleton	129	3
Old Hunstanton	56	1
Outwell	58	3
Pott Row	31	2
Runcton Holme	179	5
Sedgeford	40	4
Snettisham	98	3
Southery	79	4
Stoke Ferry	210	7
Syderstone	133	3
Terrington St Clement	144	1
Terrington St John	88	3
Thornham	315	4

Tinley St Lawrence	16	2
Upwell	189	7
Walpole Highway	173	4
Walsoken	494	2
Watlington	191	5
West Lynn	33	2
Total	7,938	149

11. Land for Economic Development

- 11.1 Economic development is defined by the NPPF as development; including those within B Use Classes (business offices not offering financial or professional services, general industry and storage 7 distribution) public and community uses and main town centre uses. Importantly it excludes housing development.
- 11.2 The BCKLWN have separately produced an Employment Land Review paper to support the Local Plan review, this covers the topic in greater depth. Not wishing to replicate that paper in full, a summary of the employment landscape (in relation to land) of the Borough and likely future need is provided below.
- 11.3 The current Local Plan seeks to direct economic development towards King's Lynn, Downham Market and Hunstanton; employment land allocations are made accordingly (policies CS01, CS03, CS10, E1.12, F1.2, F2.5 & E2.1). The Local Plan also recognises the importance of two major employers within the Borough RAF Marham and the National Construction College at Bircham Newton (policy DM14). As well as this there is policy which supports the role of the Port of King's Lynn (E1.2A). Below this higher level the Plan also recognises the importance of smaller scale employment opportunities across the Borough, including those at rural locations (policies CS06, CS10, DM2 and DM3).
- 11.4 The 2014 HELAA recognised the importance of new employment allocations as these would be needed to provide job opportunities for residents with the Borough to support the overall growth aspirations. New employment allocations were provided by the Local Plan (SADMP) adopted in September 2016. These allocations accord with the CS aspirations and spatial strategy (CS01) to locate employment growth according to the settlement hierarchy (CS02). With 75% of employment land located at the Borough's main urban area King's Lynn, 23% at the Borough's second largest urban area Downham Market and 2% at the Borough's third largest urban area Hunstanton.
- 11.5 The most recent, 2016/17, Authority Monitoring Report (AMR) provides an update to the progress of the employment land allocations and indicates that of the 69 ha (hectares) allocated, 67.2 ha are currently available.
- 11.6 However, this isn't the full picture as beyond the allocations, there are existing and established areas of employment land. Employment land beyond the allocations totals 355.7 ha of which 313.44 ha are developed and 42.26 ha are available. The total amount of the employment land identified is 424.7 ha of which 315.24 ha are developed and 109.46 ha are available. A breakdown of these figures and locations are provided in the tables over the page. (position as of the end of the 2016/17 financial year)

11.7 The previous five years uptake of employment land was 17.1 ha on the employment land sites identified in the tables below. This equates to 3.42 ha per year, based upon this and if the uptake remained constant there would be 19.6 years' worth of employment land supply on the Local Plan Allocations alone. This could potentially be sufficient through to 2036/37. The vast majority (11.8 ha) of take up involved the redevelopment of the former Campbell's factory on Campbell's Meadows, King's Lynn, by Tesco. Clearly if the other identified employment sites were factored in there would be an even greater supply (32 years' worth).

Local Plan Allocations

Site	Area (ha)	Developed (ha)	Available (ha)
E1.12 – HAR – Hardwick - King's Lynn	27	0	27
E1.12 – SAD – Saddlebow - 9King's Lynn	23	0	23
F1.2 – Land off St. John's Way – (St. Johns Business park) Downham Market	17	1.8	15.2
F2.5 – Land south of Hunstanton commercial Park - Hunstanton	1	0	1
E2.1 –West Winch Growth Area (Employment)	1	0	1
Total	69	1.8	67.2

King's Lynn

Site	Area (ha)	Developed (ha)	Available (ha)
Campbell's Meadow	18.8	18.8	0
East Coast Business Park	4.7	4.7	0
Estuary Road	1.6	1.6	0
Hardwick Narrows Industrial Estate	40.6	40	0.6
Hardwick Industrial Estate	92.2	91.7	0.5
Horsley's Fields	7.1	4.3	2.8
North Lynn Industrial Estate	36.6	36.54	0.06
Palm Paper	50.6	50.6	0
Saddlebow Industrial Estate	17.1	17.1	0
Willows Business Park	17	6.3	10.7
Total	286.3	271.64	14.66

Downham Market

Site	Area (ha)	Developed (ha)	Available (ha)
Bexwell Business Park	9.7	9.0	0.7
Land Adj. Bexwell Business Park	24	0	24
Trafalgar Road Industrial Estate	4.7	3.6	1.1
Total	38.4	12.6	25.8

Hunstanton

Site	Area (ha)	Developed (ha)	Available (ha)
Commercial Park	1.1	0.5	0.6
Oasis Way	3.4	2.2	1.2
Total	4.5	2.7	1.8

Rural Area

Site	Area (ha)	Developed (ha)	Available (ha)
Common Lane, Setchey	20.7	20.7	0
East Winch Hall, East Winch	5.1	5.1	0
Snettisham	0.7	0.7	0
Total	26.5	26.5	0

Borough Wide Total

Site Source	Area (ha)	Developed (ha)	Available (ha)
Allocations	69	1.8	67.2
Others	355.7	313.44	42.26
Total	424.7	315.24	109.46

11.8 The Employment Land Study looks at the latest East of England Forecasting Model (EEFM) (2016) and data from the Valuation Office Agency (VOA) (2016) and concludes that there is sufficient employment land currently available or which could be redeveloped within the Borough. It also concludes that in the past (1998 Local Plan) that too many employment allocations had been made and they were generally too large. Whilst some were taken up, a number were never taken up and were either removed or made way to housing proposals. The study also outlines that are a number of uncertainties that the future may hold not least the impacts of Brexit.

11.9 Through the Local Plan review Call for Sites and Policy Suggestions consultation 23 sites were submitted for consideration as employment/economic sites. The majority were as part of a mixed use scheme involving an element of housing; never the less these have also been considered as land for economic usage.

11.10 Appendix 3 provides summary appraisal of the sites, this should be read in conjunction with the relevant HELAA site appraisal form if applicable.

11.11 In total the 23 submitted sites could potentially provide 178.36 ha of employment land.

11.12 A number of sites submitted are already allocated for employment use within the Local Plan so these will be removed from the total capacity in the final results as they would already be counted towards the capacity. Most of sites submitted were not at locations where the current Local Plan would direct growth towards, i.e. the main urban areas of King's Lynn, Downham Market or Hunstanton.

11.13 Four sites are considered to be potentially suitable, and these could potential provide a further 8.15 ha of employment land. This broken down as 2.8 ha at King's Lynn, 2.25 ha on two sites at Downham Market and 2.1 ha at Snettisham. The site at Snettisham whilst not at one of the three main urban areas is adjacent to an existing employment area and the area is identified within the emerging Snettisham Neighbourhood Plan as suitable for future employment. All four of the sites are adjacent to either existing employment areas and could act as extensions to these. Further details of these four sites are provided in the table on the next page.

11.14 Overall the total amount of employment land identified through the HELAA as available is 117.55 ha. The table below provides a breakdown of this:

Site Source	Area (ha)	Developed (ha)	Available (ha)
Allocations	69	1.8	67.2
Others	355.7	313.44	42.26
HELAA	8.15	0	8.15
Total	432.85	315.24	117.55

11.15 The employment land which has been identified in the table above as currently available does not factor in the potential for employment land which is classed as already developed to be re-developed. Based on the previous 5 year taken up this could mean a potential for 34 years' worth of employment land (note this doesn't include the port and associated industrial area).

HELAA Ref	Site Ref	Settlement	Address	Proposed Use	Size (ha)	Notes
H088	25-11-20163017	Downham Market	Land East & West of St John's Way	General Industrial, Storage and Distribution	1.25	The site totals 5.2 ha. Part of the site is allocated as F1.2, the remainder could act as an extension (1.25 ha). See assessment form for further details
H091	23-11-20161870	Downham Market	Jaques Field, South of St Johns Business Park,	Business & Offices, General Industrial, Storage and Distribution	2	Site is adjacent St. Johns Business Park (F1.2), could act as a logical extension. See assessment form for further details
H322	28-11-20169918	Snettisham	Land at Beach Road	Business & Offices, General Industrial, Storage and Distribution, Public Open Space	2.1	The site is adjacent the existing commercial park and the emerging Snettisham Neighbourhood Plan suggests this broad location for a future employment area
H525	25-11-20165672	King's Lynn	Land off Estuary Road, North Lynn	B1, B2 and B8 employment uses, as an extension to Riverside Industrial Estate	2.8	The site could form an extension to the existing Industrial estate adjacent. See assessment form for further details

12. Retail

- 12.1 The BCKLWN have prepared a separate Retail Paper to support the Local Plan review.
- 12.2 The paper concludes that there a need to provide for an additional 20,000 m2 of retail floorspace in King's Lynn Town Centre in the period to 2036. And that this provision should be supported by a raft of other measures including supporting the King's Lynn Town Centre Partnership and the King's Lynn Business Improvement District (BID); in aiming for a qualitative improvement of the town centre; and fighting current deficiencies. Redevelopment of vacant units and sites to accommodate new development should be a focus, but also the reuse of smaller units, with strategies for (unused) upper floors. There already is provision of 95,000m2 of retail floor space, which when combined with the additional 20,000m2 would provide a potential total of 115,000m2.
- 12.3 The current Local Plan contains Policy E1.2 which is for the expansion of the King's Lynn Town Centre retail area. This seeks to encourage expansion and enhancement of retail and other town centre uses to provide or contribute towards the 20,000m2 of retail and related floor space.
- 12.4 The Norfolk Market Town Report 2017 (NMTR) published by Norfolk County Council (NCC) (December 2017) indicates that are 133 business premises within the town centre of Downham Market, 16 of which are currently vacant, which provides a vacancy rate of 12%. The vacancy rate has doubled since 2013. The Local Plan contains a policy (F1.1) which seeks to encourage retail development within the town centre of Downham Market, and resist general industrial, warehousing and distribution type uses.
- 12.5 The NMTR results for Hunstanton show that there are 120 business premises with the town centre, of which 5 units are vacant, giving a vacancy rate of 4%. This rate has remained similar to that report in 2015 and 2013. Within the Local Plan is a policy (F2.1) which aims to encourage retail and other associated town centre uses, whilst restricting the use for industrial, warehousing and distribution purposes.
- 12.6 Both Downham Market and Hunstanton Town Councils are in the process of developing Neighbourhood Plans for their Parish areas. These will most likely cover the topic of employment, retail and town centres. Both are working towards a draft neighbourhood plan. Downham Market was designated in January 2016 and Hunstanton in February 2013.
- 12.7 Through the Local Plan review Call for Sites and Policy Suggestions consultation, no sites were proposed for retail use, or could be considered suitable for retail use, or are located within town centres. However, the BCKLWN Retail Paper concludes that there is a limited demand for further retail space and that this demand is likely to be met through redevelopment, re-use or adaptation. This will be monitored through future BCKLWN Annual Monitor Reports (AMR).

13. Conclusion

13.1 The HELAA has identified that there is a potential land supply across the Borough which could deliver 23,809 dwellings over the next 20 years. 7,938 dwellings are from HELAA sites i.e. those submitted for consideration in the Local Plan review Call for Sites and Policy Suggestion Consultation. 2,852 dwellings are from those identified within the 2016/17 Housing trajectory, with planning permission. 8,933 dwellings are identified from the Local Plan allocations. 40 dwellings are identified from adopted Neighbourhood Plans. With the remaining 4,046 dwellings from attributed to a justified windfall allowance.

13.2 Preparation of the Local Plan review began shortly after the Site Allocations and Development Management Policies Plan was adopted in September 2016, with a 'call for sites and policy suggestion consultation' running for a six week period towards the end of 2016. This means that the most relevant housing trajectory and schedule was the one which covered the financial year 2016 – 2017, and therefore this is the baseline.

13.3 The 2016 -2017 Housing Trajectory showed housing completions and housing commitments (existing allocations and planning permissions) for a total 11,190 homes. Purely taken as a number with a Local Housing Need of 11,100 no further allocations would be required. However, to ensure that the Local Plan review is positively prepared, that the Borough Council is in the best place to be able to demonstrate a 5 year housing land supply position, and pass the Housing Delivery Test, a degree of flexibility has been added into the Local Plan review with regard to housing numbers. This also recognises that some sites may not come forward as envisaged at the time the housing trajectory was prepared and that as part of the Local Plan review some of the allocations made by the previous Local Plan which have not progressed are not to be carried forward but deallocated and removed from the Local Plan review.

13.4 In terms of flexibility it is proposed to include 10% across the Borough (including the West Winch Growth Area) and a further 5% on top of this at West Winch Growth Area. The overall calculation is as follows:

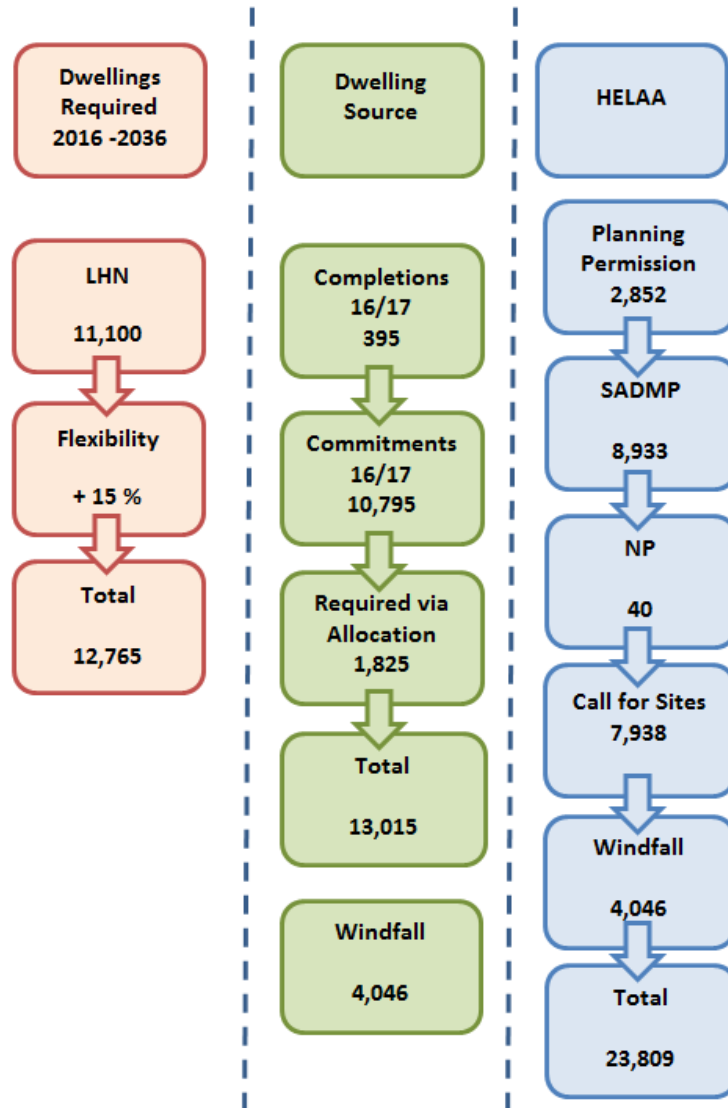
$$11,100 \text{ (LHN)} + 15\% \text{ (flexibility)} = 12,765$$

$$11,190 \text{ (2016/17 completions and commitments)} - 250 \text{ (deallocated dwellings)} = 10,940$$

$$12,765 - 10,940 = 1,825$$

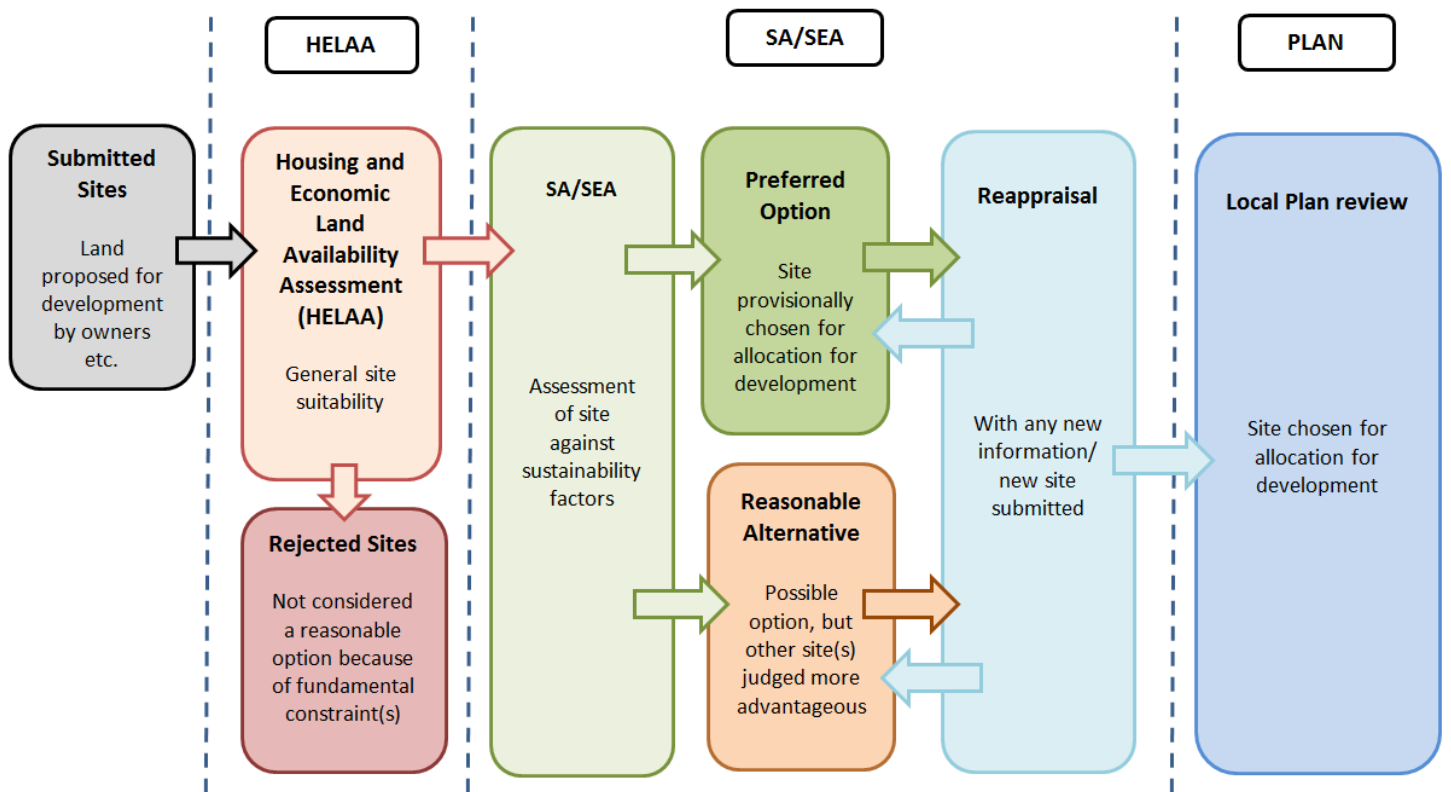
13.5 So the Local Plan review in combination with Neighbourhood Plans will seek to make allocations for at least 1,825 dwellings.

- 13.6 Planning for the exact number to meet the need leaves little room for manoeuvre should any site not come forward as envisaged and so an element of flexibility has been built in. This clearly looks at the growth which will be planned and allocated, however it is important to note the important contribution that windfall development, i.e. those sites which will come forward and gain planning permission (and subsequently built) which are not specifically allocated within the Local Plan or Neighbourhood Plans. Such sites could come forward within settlement development boundaries, or they could come forward outside development boundaries as further flexibility for this is built into the Local Plan review with the inclusion of a new policy specially related to such development opportunities.
- 13.7 The Local Plan review realises the importance which Neighbourhood Plans can play in contributing towards housing growth. Neighbourhood Plans of course can plan for a higher figure than the Borough Council will provide them with indicatively.
- 13.8 This requirement can therefore be more than adequately delivered through the identified potential land supply; this will be boosted further by the emerging Local Plan review which is anticipated to allocate further sustainable sites to accommodate housing growth.
- 13.9 Given the current position on housing delivery, as set out in the 2016/17 Housing Trajectory and associated documents, the Borough Council is currently able to demonstrate a five year housing land supply position in excess of 5 years' worth (please see the 2017 - 2018 Authority Monitoring Report) and that it is anticipated that growth required by the Core Strategy (16,500 dwellings) is likely to be achieved within the current plan period (2001 -2026).
- 13.10 The diagram below illustrates the dwelling numbers required and where will come from. Note that windfall as part of the Local Plan review is considered as additional flexibility:



13.11 Those sites which have successfully passed through the HELAA will be subject to a Sustainability Appraisal (Incorporating Strategic Environmental Assessment) which will also support the emerging Local Plan review. This will be the main tool used to assess the sites cumulatively and provide a set of sites which are classed as preferred options and reasonable alternatives.

13.12 It is anticipated that future Local Plan review consultation stages will no doubt present further information in support of sites that haven't passed the HELAA and therefore there is the potential for a site to come back into consideration. Likewise it also anticipated that new sites (those not currently known to the Borough Council) will also be put forward for consideration. The diagram over the page illustrates broadly the Local Plan review site selection process :



14. Overall Conclusion

The HELAA has identified that there is a potential land supply across the Borough which could deliver 23,809 dwellings over the next 20 years. This is in excess of housing need requirement of 11,100 dwellings over the same time period. It is also likely that West Winch Growth Area will continue to provide completions beyond this period.

Of the 23,809 dwellings identified by the HELAA, 7,938 dwellings are identified from sites which have been submitted for consideration in the Local Plan review through the Call for Sites and Policy Suggestion Consultation. This figure is in excess of the 1,825 dwellings required through the site allocation process as part of the Local Plan review (2016 – 2036), including an appropriate level of flexibility.