

## Home Builders Federation

### Matter 3

## GREAT YARMOUTH PART 2 LOCAL PLAN EXAMINATION

### Matter 3: Housing - Need & Requirement

#### Issue 1:

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to overall housing need and the housing requirement?

#### Questions

1. The documents submitted for examination include a limited review of policies previously adopted in the CS, including Policy CS3 in terms of the housing requirement. Is such an approach in Policy UCS3 - justified and consistent with national policy?

As set out in our representations and our matters statements we do not consider the approach to be consistent with national policy on the basis that the plan period has not been extended in line with paragraph 22 of the NPPF. In addition, consideration has not been given as to whether the Council should plan for a higher housing figure in relation to proposed growth strategies or infrastructure improvements.

2. Is the minimum annual Local Housing Need (LHN) figure robust and calculated in accordance with Planning Practice Guidance (PPG)? Are the housing needs of the relevant Housing Market Area being met?

We would agree with the Council's assessment of the minimum annual local housing needs assessment.

3. Is the approach in the Plan of setting the housing requirement in Policy UCS3 through application of the LHN figure to only part of the plan period (2019/20 onwards) justified? In doing so, does the Plan take appropriate account of housing delivery since the start of the CS plan period in 2013?



The application of the standard method allows the Council to apply the outcomes of the local housing needs assessment from the point at which that assessment is undertaken. However, as we outline in our matter 2 statement the Council must also have regard to paragraph 22 of the NPPF and extend the plan period by a further 6 years to ensure that this strategic policy is consistent with national policy.

*4. Is there any evidence to suggest that it might be appropriate to plan for a higher housing need figure than the LHN, due to factors such as previous housing delivery rates, growth strategies, strategic infrastructure improvements or unmet needs from neighbouring authorities?*

As we set out in our statements to matter 2 it is important to recognise that the standard method arrives at the minimum number of homes to be planned for. As such the decision to reduce its housing requirement the Local Plan must be considered against the need to ensure that there are sufficient homes provided to meet the economic growth within Great Yarmouth. This work has not been undertaken and on the basis of the published SHMA it would appear that the economic needs of the Council would be supported by housing growth of between 390 to 410 homes per annum. This evidence is now some 7 years old and we would have expected the Council to update this evidence in the light of its decision to reduce its housing requirement. In particular we would have expected the Council to have taken into account significant investment that is expected to come forward in the Great Yarmouth and Lowestoft Enterprise Zone which has been developed to maximise the opportunities in the energy sector and create new high skilled jobs in the Borough. The Council will need to provide evidence that it has both the right number and type of housing to support the Council's economic growth expectations – evidence that has so far not been provided.

*5. Is there a need for an adjustment to the housing requirement to account for vacant dwellings, second homes or to deliver affordable housing?*

The housing requirement should take account of the need to deliver more affordable homes. The Strategic Housing Market Assessment (2013) from 2013 identified that there are an additional 438 homes per annum required to meet needs. No new evidence has been provided and as such it must be assumed to remain relevant. If that is the case then it is surprising that the Council have looked to reduce its housing requirement so readily given that Planning Practice Guidance states at paragraph 2a-024 that "An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes". However, rather than seek to provide more homes the Council has stated in paragraph 1.4 that a modest uplift would not result in significant increases and a more radical uplift to meet affordable housing need in full would be unachievable. However, the other avenue open to the Council would have been to maintain the existing requirement and seek to identify sites that would be deliverable over the remaining plan period. This may not meet affordable housing needs in full, but it would clearly be an improvement on what is being proposed.

6. Are the approaches to the housing requirement and employment land in the Plan consistent? Does the minimum local housing need of 363 new homes per annum for the remainder of the plan period have sufficient regard to the number of jobs planned for?

As we have outlined above and, in our statements on matter 2 the Council must provide the necessary evidence to show that expectation for jobs growth is consistent with the number of homes it is required to deliver.

7. In overall terms is the proposed housing requirement of 363 homes per year for the remainder of the plan period appropriate and justified? Should it be increased or decreased, and if so on what basis?

Firstly, the figure should be higher in order to take account of the high level of affordable housing needs in the Borough. Secondly, the Council must ensure that this figure is sufficient to support its economic growth aspirations.

13. Is Policy A2 justified, effective and consistent with national policy with respect to the specific requirements relating to new homes, including the setting of minimum requirements for accessible and adaptable housing to meet requirement M4(2) of the Building Regulations? Has that requirement been taken into account as part of the viability evidence?

Whilst it would appear likely that part M4(2) will be made mandatory through proposed changes to the Building Regulations this is still to be confirmed by the Government and as such it is important that the Council's policy as set out in A2 is justified. The HBF consider it the case that new homes built to the mandatory part M4(1) will be suitable for a significant proportion of the population throughout their lifetime. However, we recognise that there will be a need for some new homes to be built to higher accessibility standards.

The Council have now provided further evidence in its Topic Paper (C5) on this issue to support the proposal that all new homes should be built to part M4(2) of the Building Regulations. This evidence provides an assessment as to the current and future needs based on Census data on the English Housing Survey. This is welcomed but it is unclear as to how the English Housing Survey has been used. For example, the English Housing Survey 2014/15 indicates in its main findings (attached in appendix 1) that 9% of all households in England had a long-term illness or disability that required adaptation to their home. Applying this to the Council's households as of 2016 of 43,579 would result in around 3,900 households requiring adaptations at the start of the plan period compared to the Council 5,556 households.

The evidence also extends to 2036 – 6 years beyond the end of plan period. Given that the Council are expecting to increase supply over their plan period by 4,742 homes is reasonable to assume that there would be a total of 48,300 households by 2030. If 9% of these households would have a long-term limiting illness that requires their home to be adapted, it would be reasonable expect that the number of households requiring

adaptations to their house would be in the region 4,300. As the Council note not all of those who need their home adapting will need to move to ensure those adaptations. The Council estimate that around 59% of those requiring their home to be adapted are likely to be able to adapt their current home to meet their needs. Therefore, we would estimate that by the end of the plan period the number of households in GYBC requiring a new home built to M4(2) would be around 1,800 – around 37% of the new homes proposed to be built. Given that national policy requires the adoption of the optional technical standard to address an identified need we would suggest that there is no justification for all new homes to be built to the higher optional standard.

14. Is there any evidence that any of the other housing design principles in Policy A2 would affect the viability or deliverability of housing sites? Is the policy sufficiently flexible? Would it allow for specific circumstances, including viability, to be taken into account?

No comment

15. Having regard to the Plan's limited review of and update to the CS, is there a need to make changes to Policies H1 and/or H2 to revise, clarify or supplement the approach of Policy CS4 of the CS given the subsequent updates to national policy in relation to affordable housing, and to reflect the requirements of paragraph 62 of the Framework?

Yes. As set out in our representation the Council's current policy is inconsistent the threshold at which affordable housing can be required. If the Council is amending the Core Strategy to reflect national policy it stands to reason that the Council's affordable housing policy is also amended.

## **Issue 2:**

**Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.**

### **Questions**

1. What is the estimated remaining total supply in the plan period 2013-2030? How does this compare with the stated housing requirement in Policy UCS3 of 5,303 new homes over the plan period (363 homes per year for the remaining 11 years of the Plan)?

For Council

2. What is the estimated total supply in the plan period from:

a) Completions

b) Existing planning permissions (subdivided as full, outline, etc)

c) Other commitments (e.g. sites subject to S106)

d) Windfalls

e) Existing CS allocations and proposed site allocations

For Council

3. What informed the assumptions about the scale and timing of supply in relation to build-out rates and lead-in times from these various sources? Are these realistic and based upon up-to-date evidence? Has there been any discounting of sites with planning permission? Is the windfall allowance realistic and justified by compelling evidence?

The HBF does not comment on the deliverability of specific sites. However, it is important that the Council can provide the necessary evidence to show that sites are either deliverable or developable as defined by the NPPF.

**Note: The Council should produce an up-to-date site by site trajectory identifying each within the overall supply, arranged by category as per Question 2 above and with their likely development timescale broken down on an annual basis (update to Document C6). This should be provided to the Inspector in hard copy A3 format. Any updates or changes to the status of sites and/or planning permissions should be highlighted.**

4. What evidence demonstrates that the sites will be deliverable or developable in accordance with the Framework?

The HBF does not comment on the deliverability of specific sites. However, it is important that the Council can provide the necessary evidence to show that sites are either deliverable or developable as defined by the NPPF.

5. Is the housing supply in locations that accord with the spatial strategy in Policy CS2 of the CS?

No comment

6. Are sufficient sites allocated to meet the identified housing requirement in accordance with the Framework?

No comment

7. Has the cumulative impact of all allocated sites, and other sites within the supply, on the highway network and other infrastructure such as education facilities been taken into account in the Plan? What evidence demonstrates this? What mitigation will be put in place to ensure any adverse impacts are minimised?

No comment

8. How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply not specifically identified? Is there any evidence that the

supply of housing includes sites which should not be considered developable during the plan period?

No comment

9. Does the evidence demonstrate that 10% of the housing requirement will be accommodated on sites no larger than one hectare in accordance with paragraph 68 a) of the Framework?

It is for the Council to answer and if they not meeting this expectation of national explain why not. It is important that the Council can show there to be sufficient supply of small sites to accommodate at least 10% of the housing requirement. In line with national planning policy, it is important that the Council does more to actively identify and allocate small sites. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country, resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80% following the introduction of the plan-led system in 1990.

HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. This is why the Government, through the NPPF, now requires local authorities to allocate more sites of varying sizes. It is therefore essential that the Council can show that this plan is in accordance with paragraph 68 of the NPPF.

10. Are Policies H1 and H2 justified and consistent with national policy, with respect to the requirements of developments relating to affordable housing tenure mix and delivery (including the proportion of affordable home ownership)?

As we set out in our representations part b of policy H1 requires 10% of all affordable homes are to be made available as affordable home ownership. However, this approach is inconsistent with paragraph 64 of the NPPF which requires 10% of all major developments to be available for affordable home ownership unless it would exceed the level of affordable housing required in the area. The policy should be amended to reflect national policy.

11. Is there any clear evidence that the policy requirements of Policy H1 would affect the viability or deliverability of housing sites? Is the policy consistent with the flexibility afforded in paragraph 64 of the Framework?

No comment

12. Is Policy H3, justified, effective and consistent with national policy, with respect to the requirements of developments in terms of housing density and also to justify 'exceptional circumstances' if departing from the minimum densities? Are the allocations proposed elsewhere in the Plan broadly consistent with the policy?

No comment

13. Is the intention of the Plan to identify a housing land supply for the plan period with a buffer of 33% above the stated housing requirement, a justified and effective approach when having regard to the Framework?

It is important to have a considerable buffer within housing supply to provide the necessary flexibility to ensure needs are met in full. This is especially the case in areas that have struggled to deliver new homes in their area. Great Yarmouth is one such area where delivery has been well below what was expected. GYBC have acknowledged these difficulties and as such it would seem eminently sensible to prepare a plan with this level of buffer in supply to off set the uncertainties of delivering development in this area. It is also the case that the Council are looking to deliver substantial development in Great Yarmouth in order to support the regeneration of the town. This is to be encouraged but it must be recognised that land allocated for development in Great Yarmouth may take longer to come to the market and will be more susceptible to economic uncertainties. We would therefore support the Council in maintaining a substantial buffer in its land supply.

14. Is the approach to housing supply and delivery in Policy H13 justified and consistent with national policy, and is there any evidence that the policy approach would affect the viability or deliverability of housing sites?

No comment

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