

Sent by email to: localplan@great-yarmouth.gov.uk

17/02/2023

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the new Great Yarmouth Local Plan

1. Please find below the Home Builders Federation (HBF) response to the consultation on the options for the new Great Yarmouth Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Q3) Is the target of 353 homes a year, equating to 7,060 between 2021 and 2041, the most appropriate housing requirement for the plan?

2. The HBF would agree that the local housing needs assessment (LHNA) for Great Yarmouth is 353 dwellings per annum (dpa) using a base year of 2021. However, as the plan progresses the Council will need to review its LHNA to reflect any changes to the inputs to the standard method.
3. It is also important to note that the NPPF establishes in paragraph 61 that local housing needs assessment is the minimum number of homes that should be planned for recognising that there will be circumstances where housing needs will be higher than those established using the standard method. The Great Yarmouth and the Broads Local Housing Needs Assessment (GYBLHNA) recognises this and in section 3 considers whether there are circumstances relating to jobs growth that may warrant a higher housing requirement.
4. Whilst the results indicate that the economy of Great Yarmouth needs circa 150 new workers each year to support the local economy this is currently a cursory assessment and is in part reliant on people working longer. Given Great Yarmouth and the Council's ambitions to deliver consistent economic growth in the area, and its growing role in the renewable energy sector through the enterprise zone covering the town, it will be important of the local plan to ensure that, in line with paragraph 82c of the NPPF, that the lack of housing does not become a barrier to investment in Great Yarmouth's economy. The Council cannot rely on ageing



workforce being able to support its ambitions and we would therefore suggest that a more detailed assessment of the balance between housing, jobs and the Council's growth ambitions is undertaken in order to ensure that housing growth and economic aspirations are aligned.

5. In addition, the Council should consider whether it would be appropriate to increase the housing requirement in order to better meet the need for affordable housing within the Borough. The GYBLHNA states that there is a need for 2,644 affordable homes over the plan's 20 year timeframe – roughly 34% of the housing needs for the area. However, the viability of development in the area is expected to limit the delivery of affordable housing to a level significantly below what is needed. As is noted in the Sustainability Appraisal Scoping Report in 2020/21 just 17.7% of completions were defined as affordable homes. Whilst this was an increase on the previous year it is evident that if the Council is to get closer to meeting these needs that the only option for the Council will be the delivery of more market housing. Given the vital role housing plays in the health and well-being of the population it will be necessary for the Council's Sustainability Appraisal to include an alternative strategy that delivers beyond the housing requirement in order to improve the delivery of affordable housing. In the HBF's opinion a failure to consider such an option would compromise the robustness of the SA and the soundness of the local plan.

Q4) Should the Local Plan provide for more homes than the minimum requirement of 7,060?

6. Yes. In order to ensure that housing needs are met in full over the plan period the Council must guarantee that there is a buffer between housing needs and the supply of new homes. There is no formula as to the size of the buffer. As such the Council will need to consider the relative risks of the spatial strategy that is chosen when considering how much supply is required to ensure a consistent supply of homes across the plan period. For example, a spatial strategy that focuses the significant majority of development on a few large sites or ambitious urban regeneration to meet its housing needs is more likely to see delays to delivery than a strategy that has an even distribution of allocations between large, medium and smaller sites. Therefore, where a plan is reliant on a limited number of large or ambitious projects to meet needs the HBF would suggest that a 20% buffer is required to ensure the plan is deliverable. A plan with a more balanced supply would potentially only need a 10% buffer as the larger the number of allocated sites means there is less risk should one or more of the allocated sites be delayed.

Q9) Should new housing development be more focussed in the urban (Great Yarmouth, Gorleston and Bradwell) or the rural parts of the borough or an equal balance between the two areas?

7. HBF does not provide any comment as to specific locations or sites for development. However, it will be important that the Council does not focus on urban areas to the exclusion of other settlements and the needs of those

communities. Housing development in smaller communities can ensure that services in these settlements are maintained and improved by ensuring a greater diversity of households. Whilst we recognise that communities may see development as a negative impact on services the Council will be aware that with an ageing population and limited housing growth can lead to the ossification of smaller settlements with services closing as demand declines.

8. What will also need to be a key focus of the spatial strategy set out in this local plan will be the allocation of small sites in line with paragraph 69 of the NPPF which requires 10% of the housing requirement to come forward on sites of less than one hectare. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. 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.
9. The 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.
10. If the Council are to ensure there is a wide variety of SME house builders operating in its administrative area, and the benefits it brings to the speed of delivery and variety of homes, it must ensure that there is a variety of sites. This is why the Government, through the NPPF, now requires local authorities to allocate sites of varying sizes and why the HBF advocates for the allocation of more small sites in local plans.

Q17) Should the new Local Plan retain the policy of Development Limits, or should it take a different approach?

11. The use of development limits will depend on the approach taken to allocating sites and in particular small sites. Where councils are proactive in allocating sites on the edge of settlements and are not reliant on windfall to meet needs then the use of development limits are less of an issue. However, where there is a reliance on windfall the HBF are concerned that the use of development limits can be inflexible and will limit the delivery of sustainable development in smaller settlements which have been a key source of delivery in primary and secondary villages. If the Council is going to rely on windfall delivery it will need to have

policies that will maintain its diminishing supply. We would therefore recommend that policy GSP1 is revised to increase its scope to support a wider range of sustainable residential development in all villages. The policy could be revised to allow residential development on the edge of settlements where it is of an appropriate scale and does not adversely affect the character of the area as well as being supported by the necessary infrastructure.

Q24) Should we continue to set minimum densities for new developments outside of our town centres? If so, what should it be?

12. The Council should be seeking to set appropriate densities that will ensure sites make the most effective use of land. Therefore, any policy taken forward should recognise that density targets are the starting point and that these could be higher or lower depending on the site and its location.

Q25) Does the current approach to calculating density i.e., dwellings per hectare remain appropriate, or should we consider alternative methods to calculate density e.g., habitable rooms per hectare?

13. The current approach to calculating density should be maintained as it is an easily and widely understood assessment as to the density of development and the Council should not seek to overly complicate its approach.

Q26) Should the Council continue to require new housing developments to meet the higher water efficiency standard of 110 litres per person per day?

14. As set out in PPG the Council will need to have the evidence to justify the need to maintain the higher water efficiency standard.

Q27) Should the Council consider adopting additional optional standards in relation to M4(3) wheelchair users or the nationally described space standards?

15. If the Council wants to adopt a standard with regard to wheelchair accessible homes it will need to ensure it has a robust evidence base to support any proposed policy requirement. This will need to look not only at the future local needs for wheelchair accessible homes but also the potential for existing properties to be made accessible and the tenure split for these homes.

Q28) Should the plan provide for the affordable housing need as a minimum?

16. On the basis of earlier viability studies and past delivery meeting affordable housing needs will require the Council to allocate sites that will deliver housing growth above the minimum required by the standard method. Indeed, the difficulty the Council has faced in delivering affordable housing will be further exacerbated by the increasing costs being placed on new development in future. The Future Homes Standard and Biodiversity Net Gain for example will place additional costs on new development and potential reduce the scope for affordable housing

contributions in future. In addition, the Council will need to consider the spatial strategy it chooses if it is to improve the delivery of affordable housing by seeking to allocate more sites in areas where such homes can be viably delivered. A focus on the urban area will see the Council continue to struggle in delivering affordable housing unless significant grant funding can be found to support its provision. Therefore, as set out above, the HBF considers the need to improve delivery of affordable housing in the Borough be significant and justified reason for the Council to adopt a higher housing requirement than the local housing needs assessment.

Q29) Should the plan continue to seek different levels of affordable housing on new housing developments, based upon their location in housing sub-market areas?

17. Yes. A differential rate for affordable housing based on the viability of development in different areas is an appropriate way forward and is consistent with the expectations established in paragraph 58 of the NPPF.

Q31) Do you agree that the Local Plan should set its 'First Homes' local market discount at 50%? If not, what discount should be applied and how can the plan ensure that all of affordable homeownership needs are met in full?

18. The Council will need to test this proposition as part of its viability study supporting the new local plan. Previous studies commissioned by the Council show that viability in the Borough is already challenging and a 50% discount on First Homes will place additional pressure on the vitality and deliverability of new development.

Q33) Should we continue to allow market housing to enable the delivery of Rural or First Home exception sites where the financial viability of a development is challenging? If so, should the plan set a maximum percentage of market housing on such sites?

19. Yes. The delivery of such schemes often relies on the provision of market homes to support the viability of these schemes. As to the percentage of market homes on such sites this will need to take account of viability to ensure that such schemes are deliverable.

Q34) Should the Council specify a proportion of retirement housing, or other forms of housing suitable for older people (such as accessible housing or bungalows) on sites over a certain size and/or location?

20. The Council should seek in the first instance to identify and allocate standalone sites in the sustainable locations for the delivery of older peoples accommodation, such as retirement, accommodation rather than seek to specify proportions on other allocated sites. With regard to accessible homes and bungalows it is worth noting that the Government are proposing that all homes will need to be built to part M4(2) of the Building Regulations and as such there is no need to specify

such requirements in the local plan. It will also mean all new homes being suitably accessible for people at all stages of their life.

21. With regard to bungalows the HBF would consider such a policy that specifies the delivery of such homes to be unsound. Whilst bungalows have traditionally been seen as being appropriate for older people it must be remembered that single storey accessible accommodation can be achieved effectively through flatted development which also avoids delivering homes at what are often very low densities which must be considered an inefficient and unsustainable use of land and as such inconsistent with national policy.

Q35) Should the Council continue to safeguard the potential for new housing accommodation for older people to come forward on available sites (above other forms of residential accommodation) where located within the town centres of Great Yarmouth and Gorleston? Should other locations be included?

22. The Council should look to allocate appropriate sites for older people's accommodation in order to meet housing needs. However, it should not seek to safeguard these sites in the long term which may neuter a site that could meet an alternative need. As such the Council would need to provide flexibility that will allow other uses to be delivered on these sites should the accommodation for older people not be forthcoming following a reasonable timeframe from allocation and active marketing of the site for its intended purpose

Q37a) Should self-build plots be provided as part of housing developments?

23. The Council note in the consultation document that the demand for self-build plots in the Borough is quite low and the needs are being met through single plots on windfall sites. This would suggest there is no need for the Council place requirements for the provision of self-build plots on housing developments and such a policy would be unjustified.

Q37b) Should the plan allocate specific sites for 100% self-build?

24. If such sites are brought forward by landowners, then the Council should consider allocating these sites. As set out above PPG makes it clear that the Council should work with land owners to identify such sites or indeed seek to use its own land for such development. Such an approach also has the potential to ensure that self-build comes forward in appropriate locations and as an addition to the housing land supply rather than as an alternative approach to delivering a home on an allocated site. However, it will be important to recognise that such sites are likely deliver more slowly than sites being developed by an established housebuilder.

Q37c) What other options could the Local plan consider for self-build provision?

25. The Council could consider an exceptions policy that would allow small edge of settlement sites to come forward that would provide plots for self-builders where

these would not have an adverse impact on the character of the settlement or surrounding area.

Q58) How can the local plan encourage more sustainable buildings which reduce carbon emissions?

26. With regard to residential development the Government have set out a clear road map to improving the energy efficiency of new homes. Indeed from 2025 the Future Homes Standard will mean that all new homes built in England will be zero carbon ready. This means that over time as the national grid decarbonises these homes will produce no additional carbon. As the Council note further improvements can be made through the orientation of buildings to address either heating and cooling and these measures could be supported in the local plan. However, we would suggest that there is flexibility in such policies to ensure that these measures do not impact on the effective use of land.

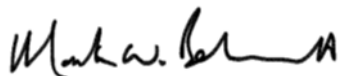
Q64a) Should the Local Plan identify specific sites for biodiversity net gain?

27. The identification of sites which could support the offsite delivery of bio-diversity net gain is supported. These should be developed through the preparation of Local Nature Recovery Strategies and would provide a co-ordinated and effective approach to net gains compared to the relative piecemeal approach that would occur through site by site delivery.

Conclusion

28. The local plan review offers the opportunity to ensure that it both economic needs and housing needs are aligned to provide sustainable growth well into the future. However, to achieve this the Council will need to ensure that the supply of land for housing has the necessary diversity in size and location to ensure that a range of different house builders are supported. In seeking to broaden delivery the Council will be able to ensure a wider mix of housing that is provided increasing choice and competition within the market to the benefit of all. We therefore hope these comments are helpful and would welcome the opportunity to discuss these issue raised further with yourselves and how we could help you engage with our members operating in Great Yarmouth.

Yours faithfully



Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk

Tel: 07867415547