

**Home Builders Federation**

**Matter 3**

**North norfolk Local Plan Examination**

**Matter 3: Delivering Sufficient Homes (Policy HOU1)**

**Issue: Whether the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing.**

*3.1 Attention is drawn to the report ‘The Possible Impact of Second and Holiday Homes in North Norfolk’ (Document E4). Should the prevalence of second and/or holiday homes in North Norfolk have any bearing on the quantity of housing that should be provided in the district over the plan period, and if so, how? Would occupancy restrictions be justified on new market housing in some areas or some circumstances? Should a policy be included in the plan on the basis that controls on the change of use to second or holiday homes may be introduced in future?*

No comment.

*3.2 Is the approach in Policy HOU1 of counting elderly persons accommodation on allocated sites ‘at a ratio of each 1.5 units ... being equivalent to a single dwelling’ (paragraph 7.1.11) justified and consistent with national policy? Should this just refer to Use Class C2 (residential institutions) with specialist elderly persons accommodation in Use Class C3 (dwelling houses) counted individually? Can the Council itemise how the numbers in the column are made up?*

The Housing Delivery Test (HDT) takes account of communal accommodation through the use of a ratio in the same manner as the council is proposing. The ratio used in the HDT for communal housing is 1.8. This ratio is used as an assessment as to how many homes might be freed up from the delivery of communal accommodation such as specialist accommodation for older people. It recognises that in some cases those moving into specialist accommodation free up housing, but this will not be the case for all such accommodation. Therefore, the use of such a ratio is consistent with the approach to assessing housing delivery in HDT. The Council will however need to ensure that the 1.5 ratio used is justified on the basis of evidence locally.

*3.3 Is the Council’s bespoke variation to the standard method for calculating local housing need, using the 2016 based household projections and arriving at a figure of 480 dwellings per annum (dpa), 9,600 dwellings over a 20-year plan period, justified and consistent with national policy? Is it based on realistic assumptions of demographic growth? Is there robust evidence of exceptional local circumstances that might justify the alternative approach, and how unique are these to North Norfolk?*

The Council’s approach is neither justified nor consistent with national policy. Paragraph 61 of the NPPF establishes that in exceptional circumstances an alternative approach to the standard method can be used. This is clarified in paragraph 2a-015 of PPG which states:

*“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.*

*Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”*

The Government has continued with the use of the 2014-based projections despite criticism and concerns that these do not reflect more recent projections of household growth. It should also be recognised that the latest NPPF published in December and its supporting guidance continues to require their use. The HBF is aware that the projections are now dated but it is clear that they reflect the government’s aims and objectives with regard to boosting the supply of housing across the country.

With regard to the Council’s position on unidentified population change the HBF do not question the discrepancy but whether the discrepancy is sufficiently substantial as to render the level of growth proposed by the standard method to be unreasonable. It is recognised that the 2016-based projections result in lower household growth across the country, with only 11 authorities across the whole of the London, the South East and East of England regions seeing a greater level of household growth within the 2016-based projections compared the 2014-based iteration. North Norfolk is no exception with the difference in annual household growth between 2021 and 2031 of the two projections being a fall of 56 households. It is notable that the average change across the East of England between the two projections for this ten-year period is 90 households. This suggests that the change is neither exceptional nor an indication that the use of the 2014-based projections, as required by national policy, is unreasonable and goes beyond the stated aim in paragraph 60 of the NPPF to significantly boost the supply of housing.

*3.4 Should the standard method based on 2014 based household projections and the affordability uplift at the publication of the submission version of the plan be used, giving 531 dpa or 10,610 dwellings over a 20 year plan period? Should a more recent affordability uplift figure be used? Should the ratio to be published in March 2024 be taken into account? What are the likely future trends in relation to house prices and average earnings locally?*

Taking the penultimate question first, the ratio to be published in 2024 should not be taken into account. Planning Practice Guidance (PPG) states at paragraph 2a-008 that whilst the changes to the inputs should be taken into account it goes on to state in the same paragraph that the housing need calculated using standard method can be relied upon for a period of 2 years from the time the plan is submitted. Therefore, the Council does not need to take into account changes to the inputs now the plan has been submitted and at examination.

With regard to the what the standard method should be, the HBF set out the level of housing need using the 2014-based household projections and using the affordability ratio based on the ratio for 2020 which was published in March 2021 and was the most up to date data at the time. This also reflected the Council’s use of the 2020 ratios in its own assessment using the 2016 based household projections as set out in paragraph 7.1.4 of the submitted local plan.

As for the data that should be used when using the standard method, PPG states at paragraph 2a-006 the most recent median-work placed based affordability ratios should be used with 2a-008 requiring Council’s to take account of changes until the plan is submitted. This would suggest that, given the plan was submitted in May 2023, the use of the latest affordability ratios published in March 2023 could be used when calculating local housing needs assessment using the standard method.

It should also be noted that when calculating the standard method, the baseline growth used is the 10 year average with PPG stating that the current year should be used as the starting point from which to consider growth over that period. Therefore, when the Council calculated this for the submission local plan this would have been the period 2021 to 2031. However, since the plan was submitted over a year after the regulation 19 consultation the calculation of the standard method would need to take into account a different base period. Given the standard method has been designed to take into account under supply in previous years the use of the most recent data would indicate that the plan is rebased to the year in which the LHNA was calculated. The table below sets out the different LHNA arising from the different base periods and using affordability ratios at the end of the year preceding the base period[[1]](#footnote-2). So, for example, if the base period starts in 2021 the 2020 affordability ratio was used.

Table 1: LHNA for different base periods

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Base period** | **Annual average growth (2014 based HHP)** | **Affordability ratio** | **Affordability uplift.** | **Cap applied** | **LHNA (dpa)** |
| 2021-31 | 403 | 9.14 | 1.32 | No | 533 |
| 2022-32 | 401 | 11.61 | 1.48  | Yes[[2]](#footnote-3) | 562 |
| 2023-33 | 396 | 10.64 | 1.42 | Yes[[3]](#footnote-4) | 560 |

The HBF cannot comment on the potential trends for house prices and average earnings in North Norfolk. What is evident from the current evidence is that affordability is a concern and that a supply side response is necessary to not only increase the supply of market housing but also the supply of affordable homes across the Borough.

*3.5 How much weight, if any, should be given to the reasoning behind Section 78 appeal decisions which support the Council’s approach? Which decisions are relevant?*

No weight should be attached to the appeal decisions. With regard to the first appeal referenced in the Council’s Local Housing Needs Assessment (LHNA) it should be noted that this decision was based on the 2012 NPPF and its supporting guidance. The standard method that is required by the current NPPF is a different approach to setting housing needs and as such limited weight should be attached to this decision. With regard to the second case highlighted in the LHNA this relates to Central Bedfordshire where the situation is significantly different to that seen in North Norfolk. The local housing needs assessment using the standard method when this appeal decision was made resulted in a housing need of 2,423 dpa compared the Council’s assessment of housing need of 1,600 dpa. This is significantly higher than the difference, both in totality and proportionately, between NNDC’s assessment of housing need and that arrived at using standard method. As such no weight should be attached to both these decisions.

*3.6 If there are exceptional circumstances justifying use of a non-standard approach, should the 2018 based projections be used as more up to date than the 2016 based projections? What should the dpa figure be then? If the 2016 rather than 2018 based projections are to be used, what would be the justification for this?*

Logic would suggest that if the use an alternate set of projections is justified then the 2018 based projections would be the more appropriate set of projections to use given that they are the most recent set of projections available to the Council and were available at the point of submission. However, as with all projections there are difficulties in that this data set is based on only two years of migration data and as such provides a limited trend data from which to accurately predict future growth. However, as stated above the HBF do not consider there to be the exceptional circumstances present to support the use of an alternative approach to assessing housing needs.

*3.7 Would it be appropriate to increase the housing need figure for the district to take account of economic growth strategies, infrastructure improvements, to address the*

*need for more affordable housing or to provide for the unmet needs of neighbouring local authorities?*

No comment.

*3.8 Are there national policies that protect areas or assets of particular importance in the district that provide a strong reason for reducing the overall provision of housing in the plan below the housing need figure (NPPF paragraph 11b)? If so, is this conclusion supported by the Housing Land Availability Assessment, and have discussions taken place with neighbouring authorities to seek to address the unmet needs?*

No.

*3.9 Given the local housing need figure for the plan period, however assessed, what level of housing provision should be made in the plan to take account of unforeseen circumstances such as allocations or planning permissions not being implemented, or completions on allocated sites being slower than currently anticipated? On the basis of the Council’s local housing need figure of 9,600 dwellings, is the provision of 10,968 dwellings for 2016-36 or 10,633 for 2020-40 appropriate? (Updated HOU1 figures in EX006)*

There is no hard and fast rule as to the level of housing supply that is necessary to ensure that needs are met in full. In general, the HBF recommend that a buffer of at least 10% is required to take account of unforeseen circumstances that may delay the delivery of key sites. If the housing requirement remains at 480 dpa, 9,600 homes over the plan period, then the buffer between 2020 and 2040 will be just 3% and offer very little room for error should development not come forward as expected.

*3.10 Given the updated monitoring figures in EX006, if the local housing need is assessed as 10,610 dwellings or some other figure, what level of provision would be appropriate for 2016-36 or 2020-40?*

Meeting needs in full on the basis of the standard method at the point at which the local plan was published would see a shortfall of around 38 dwellings per annum for the plan period 2020 and 2040, based on the supply expectation in the revised housing trajectory. The NPPF states that as minimum that housing needs must be met in full. However, the tests of soundness in paragraph 35 also require local plans to be deliverable over the plan period. To achieve this the plan must be flexible and take into account the inherent uncertainties with regard to bringing forward new development. As set out above the HBF consider a 10% buffer to offer an appropriate level of flexibility appropriate and consider that the council should be identifying sufficient site and land to deliver around 12,000 homes over the plan period.

*3.11 Should the number of dwellings with deliverable planning permission at 31.3.23 in Policy HOU1 be reduced to take account of potential non-implementation? If so, by how much?*

No comment.

*3.12 How has the contribution of future windfall sites been calculated? What is the evidence for the past level of delivery from windfall sites? Should the past contribution be discounted by 50% (paragraph 7.1.7) or some other figure? Why?*

The HBF is concerned that there may be double counting with regard to windfall. The Council include windfall from 2024/25 and we would suggest that much of the windfall expected to come forward in the first two to three years after adoption will already have permission and is already accounted for in the housing trajectory. To ensure there is no double counting during this period the council should not include any windfalls in the trajectory until 2026/27 at the earliest.

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**Home Builders Federation**

**Matter 4**

**North norfolk Local Plan Examination**

**Matter 4: Delivering the Right Mix of Housing (Policy HOU2)**

***Issue: Whether the policies of the plan are justified, effective, positively prepared and consistent with national policy to deliver the right mix of housing.***

**Affordable Housing**

*4.1 Is the need for about 2,000 affordable homes over the plan period (paragraph 7.1.5) justified by the evidence, what types are required within this total and would the policies of the plan ensure satisfactory delivery?*

The Council do not appear to have updated their evidence on affordable housing needs since the 2017 SHMA. Given that this evidence is six years old and considers needs only to 2036 it cannot be considered to be a robust evidence base on which to assess affordable housing needs.

*4.2 Is the proposal for 15% of dwellings on qualifying sites to be affordable in housing zone 1 and 35% in housing zone 2 justified by the evidence, and has the effect on viability been properly assessed?*

The Council have published an updated viability assessment following the regulation 19 consultation which includes those policy costs that were missing from the earlier assessment. The only consideration not undertaken in the study is the impact of the Future Homes Standard that is expected to be introduced in 2025. The Government have recently announced a further consultation on these standards and whilst the final detail is not known some degree of sensitivity testing is necessary to ensure that development remains viable across the plan period.

The Future Homes Hub has undertaken some work to support and inform the implementation of the Future Homes Standard which is set out in Ready for Zero. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to those that deliver zero carbon homes. This evidence indicates that in order to deliver the Future Homes Standard would be around a 5% increase in per unit costs compared to the 2021 Building Regulations.

What is notable from the conclusions of the viability assessment is impact of the policy costs on brownfield development. The table on page 40 provides a helpful summary and shows that in Zones 1 brownfield development, with the exception of village infill, cannot viably deliver all the policies required by this local plan. The table also shows that whilst greenfield sites in zone 1 and brownfield sites in zone 2 are only marginally viable. This means that any extra costs, such as those from the higher building standards being proposed by Government, could impact on their deliverability.

Therefore, whilst the HBF are supportive of the Council’s decision to reduce the affordable housing provision in zone 1 from the previous plan we would question whether his is sufficient or whether there needs to be a further variation to reduce the contribution required on brownfield land to ensure that these come forward without the need for negotiation. At the very least the council should include within policy that they are willing to reduce the affordable housing requirements where this makes development unviable. At present this is mentioned in paragraph 7.2.5 but given the fact that the viability assessment indicates a number of different site typologies will be made unviable by the policies in the local plan a more robust statement in HOU2 is required.

*4.3 How does this policy compare to the existing policy for the provision of affordable housing on large sites, and how are any changes justified or explained?*

For Council.

*4.4 Are the two housing zones, and the boundary between them, justified by viability or other evidence?*

For Council.

*4.5 How would the policy requirement for ‘at least’ 15% or 35% be interpreted and applied, and the statement in paragraph 7.2.5 that the Council will seek to deliver the highest proportion of homes that is viable. How will this be established and does this provide sufficient clarity for the policy to be effective?*

The use of “*at least*” can lead to uncertainty amongst decision makers who may seek to require higher levels of affordable housing provision where they think there is potential to achieve more. Given that paragraph 16 of the NPPF highlights that policies should be clearly written and unambiguous we would suggest the prefix “*at least*” is deleted as it is unsound.

The final sentence in paragraph 7.2.5 also creates uncertainty as to the intentions of the Council. This could be read as the Council recognising that some development will not be able to deliver affordable housing and that they are open to negotiation, equally it could be seen as an intention to seek more than the policy requirment. Given the viability assessment indicates that a number of typologies will be made unviable by the policies in this plan the HBF recommend the final sentence in 7.2.5 is deleted and replaced with alternative wording such as: “*The Council will expect residential development to meet the policy requirements for affordable housing in full. Where a viability assessment it can be shown that these requirements cannot be addressed the Council will consider off-site delivery, an alternate tenure mix or a reduction in provision*”.

*4.6 Is the required affordable housing mix for 25% of affordable housing to be first homes and the remainder rented in a mix of one, two and three bed with the majority two bed justified by the evidence of local need, consistent with national policy and has its effect on viability been properly assessed? With 15% or 35% affordable* *housing, is the policy consistent with national policy for 10% of the total number of homes on large sites to be for affordable home ownership (NPPF paragraph 65), and if not is any conflict justified?*

First homes should be treated as market housing with regard to returns given that it is the developer will market and sell these units. This means that the costs and profit margins relating to market homes should be used in relation to first homes. It would appear from the viability assessment that these have been treated the same as affordable housing that is provided by an RSL with a 6% return included and no marketing fees being applied to the affordable housing element.

The policy does not reference the requirement of national policy for 10% of all homes on major development to be delivered as affordable home ownership. Whilst 25% of the affordable housing provision is required to be First Homes this will mean that even sites delivering there full affordable housing requirement will not deliver 10% of their homes as affordable home ownership. The tenure mix in policy HOU2 requires all housing other than first homes to be rented accommodation and should be amended to support the requirement for affordable home ownership in paragraph 65 of the NPPF.

*4.7 Would it be clearer to have a separate line in the policy for sites of 6-10 in the designated rural area? Is the policy overall sufficiency clear?*

Yes. It is not at first apparent that this will be the case. In order to be consistent with need for policies to be written clearly a separate line specifying the requirement in designated rural areas is necessary.

*4.8 How would the alternative to on-site provision of a financial contribution on sites of 6-10 dwellings be assessed?*

For council.

**Market Housing Mix**

*4.9 Is the required market housing mix on sites of 6 or more dwellings – not less than 50% two or three-bedroom properties in a mix comprising approx. 20% two-bed and 80% three-bed – justified by evidence of local need and has its effect on viability been properly assessed? Does this allow sufficient flexibility to meet locally specific needs?*

No comment

***Custom & Self Build Housing***

*4.10 Is the requirement on sites of 26 dwellings/4 ha or more for at least one serviced self-build plot or 2% of the number of units (whichever is the greater) justified by the evidence, including the number of applicants on the Council’s self-build register? How* *would the requirement operate in practice to be sensitive to demand in any particular settlement over time and if the sites are not taken up?*

The only evidence we could find in relation to the need for self-build and custom housebuilding is that set out at paragraph 7.2.13 which states that there are 14 people on the self-build register. No further information appears to have been submitted with the local plan to justify the proposed requirement in HOU2. In order to justify the approach taken by the Council they should have a clear idea as to the demand for self-build housing, the type and location of sites that self-builders are looking to acquire. Alongside the assessment of needs we would also have expected some consideration as to the number of plots that the Council expect to be delivered through the policy and how this relates to the demand for self-build plots. The Council should also have examined other mechanism, as suggested in PPG, aside from the proposed policy as to how the demand for self-build plots could have been met. Examples in PPG include consideration of the Council’s own land and identification of opportunities through the Council’s housing strategy. On the basis of the limited evidence provided the proposed policy is unjustified and the requirements should be removed from HOU2.

The operation of the policy as proposed would also have a disproportionate effect on smaller developers. A developer bringing forward a site of 26 homes would have to provide at least 1 of those for self-build which his 6% of the market housing coming forward on that site. A scheme of 100 units would be required to provide 2 plots for self-build housing which is just under 3% of the market housing provide on that site. The impact of providing plots is also likely to be greater with self-builder more likely to be operating alongside main contractors and the attendant difficulties from such a situation. Therefore, whilst the HBF does not consider the policy to be justified if it were to remain the threshold at which self-build plots are required should be raised.

Finally the policy is ineffective as there is no mechanism as to when plots would return to the developer should these not be sold. This could leave plots vacant for a considerable period of time to the detriment of the homeowners on the rest of the site. Therefore, if the policy is maintained then the policy should state that after a marketing period of 6 months the plots would return to the developer to be built out.

***Specialist Elderly/Care Provision***

*4.11 Is the requirement on sites of 151 dwellings or more for a minimum of 60 specialist elderly/care units and 40 units for each additional 250 dwellings thereafter justified by evidence of local need and has its effect on viability been properly assessed? Are these sized schemes appropriate, does this allow sufficient flexibility to meet locally specific needs and would the sites be appropriately located in all cases? Has this policy been carried through consistently in the proposed allocations in the plan? How would Class 2 residential care homes be assessed in terms of units?*

No comment

*4.12 What contribution would the site allocations make towards addressing the need for specialist elderly/care units in North Norfolk? What is the overall level of need for the different types of provision and how would the reminder be delivered? Should the requirement on large housing sites, perhaps greenfield in nature and peripheral to a settlement, be supplemented by a supportive policy for such development on more centrally located, brownfield sites? Would this assist provision in settlements without large housing sites?*

No comment

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**Home Builders Federation**

**Matter 7**

**North norfolk Local Plan Examination**

**Matter 7: Housing Trajectory, Five Year Supply & HOU Policies 3,4,6-9**

***Issue: Whether the overall housing trajectory is justified, whether a five-year supply of deliverable housing sites would provide on adoption and whether housing policies 3, 4, 6-9 are positively prepared, justified, effective and consistent with national policy.***

**Housing Trajectory**

*7.1 In the light of the site-by-site discussion, is the overall housing trajectory in the plan justified by the evidence? How has the trajectory for both large and small sites been affected by the need to secure nutrient neutrality and is this realistic?*

As set out in our representations the HBF does not oppose the allocation of any of the sites within the local plan. However, it is important that the expected timescales for the delivery of these sites and the rate at which homes are delivered reasonable. The HBF is generally concerned that many local planning authorities are seeking to rely heavily on strategic development with overly optimistic delivery rates to meet their housing needs. These optimistic delivery rates are clearly a means of meeting more housing needs on fewer sites and whilst the HBF does not object to large strategic developments, by trying to shoehorn as much delivery as possible into the plan period from such sites means that fewer small sites that could deliver earlier in the plan period are not allocated.

In the NNLP the strategic allocation at Land West of North Walsham (NW62) is expected to delivery circa 1,500 homes between 2026/27 and 2039/40. Whilst the HBF do not object to the site being included but we are concerned that the Council expect this stie to commence delivering homes just two years after the plan is adopted. Such sites take considerable time to come forward from allocation through to first delivery.

Lichfields report Start to Finish provides a helpful indication as to the delivery timescales for larger development. In relation to sites of 1,000 to 1,500 homes for example the report notes that the average time taken from validation to the completion of the first dwelling to be 6.9 years. This is broken down into 4.6 years for planning approval and 2.3 years from planning permission to delivery. Whilst such timescales are averages it is worth noting that FO1, land North of Rudham Stile Lane took 4 years from validation to the grant of outline planning permission and is expected to commence in 2026/27 – nearly 10 years after the application was submitted. Whilst it would be expected that an allocated site would move more quickly through the application process the length of time from permission being granted to first home will likely be similar and that the 2 years from the plan being adopted to first completion is too short given that an application is still to be submitted.

The Council have stated in EX006 that they have considered the potential impact of nutrient neutrality in the supply of housing. Table 1 of EX003 also provides further information identifying those developments that are likely to require mitigation. This covers around 3,500 to 3,700 dwellings to be delivered over the plan period. Whilst the Council have worked positively with its neighbours to develop a mitigation strategy that will support development unable to provide its own mitigation by purchasing credits from third parties. However, what is not clear and will need to be evidenced at the examination is whether there will be sufficient credits available to support the delivery of these homes as expected in Appendix B of EX006. Our understanding is that the first tranche of credits available will support the delivery of 5,000 homes in the Yare Valley. Given that nutrient neutrality in North Norfolk relates to the River Wensum SAC and The Broads SAC/Broadland Ramsar site it is not clear when mitigation will be available to support those sites affected by nutrient neutrality in North Norfolk.

**Five Year Supply**

*7.2 Does the plan provide for a five-year supply of deliverable housing sites on adoption (say April 2025 for this purpose) against the housing requirement if it is a) 480 dpa, b) 531 dpa or c) some other figure? Is an appropriate allowance made for windfall sites and the non-implementation of commitments, and if not, what should these be? Has the need to secure nutrient neutrality been sufficiently considered?*

Firstly, it is important to state that the transitional arrangements in the NPPF published in December 2023 mean that this plan is being examined on the basis of the September 2023 NPPF. However, it is important to reflect on the fact that considerations around land supply following the local plan’s adoption will be made on the basis of the December 2023 NPPF. A key change in the latest version of the NPPF is that LPAs with an up-to-date local plan that has been assessed as having a five-year land supply on adoption will, for the first five years, not be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing supply. This significant change in policy means that the consideration of land supply in the first five years of this plan are more critical as should supply not come forward as is being proposed at examination there is no longer a requirment to bring forward additional sites to address any shortfalls.

Secondly, the Council will need to clarify its position with regard to the housing requirment. The Council state in paragraph 3.4 of Background Paper 1 that the 480 dpa figures is the council’s needs assessment of 456 dpa plus 5% to take account of the delivery buffer required by the NPPF. Firstly, this is a buffer in supply and as such does not usually form part of the housing requirement given that this is a variable buffer increasing to 20% should the council fail the HDT. The inclusion of a 5% buffer as part of the requirment to ensure flexibility in supply is not unsound but given that the buffer is not fixed the Council will need to provide clarity at the hearings with regard to its position.

The tables below are based on the Council’s delivery assumptions in ex006 and consider the various housing requirements being proposed and with the 5% buffer required by paragraph 74 of the NPPF. Whilst the 480 dpa includes a 5% buffer we have included it in the assessment as this is the stated housing requirment.

*Table 1: 5-year land supply including 5% buffer – 2023/24*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| A. Requirment | 456 dpa | 480 dpa | 531 dpa | 560 dpa |
| B. Five-year requirment (Ax5) | 2,280 | 2,400 | 2,655 | 2,800 |
| C. Deficit | 0 | 129 | 282 | 685 |
| D. 5% buffer (B+C x 0.05) | 114 | 126 | 147 | 140 |
| E. Total Five-year requirment B+C+D) | 2,394 | 2,655 | 3,084 | 3,046 |
| F. Five-year supply | 3,095 | 3,095 | 3,095 | 3,095 |
| G. 5YHLS | 6.31 | 5.83 | 5.02 | 4.65 |

On the basis of what the HBF considered to be the LHNA at the time of the regulation 19 consultation the Council would have a marginal land supply on adoption even on the basis of the Council’s proposed trajectory. If the LHNA is updated to take account of the most up to date information at the time of submission, then the land supply falls below the housing requirment for the first five years of the local plan.

However, adjustments are also needed to the supply. Firstly, the concerns outlined earlier in this statement raise significant doubts about the soundness of including NW62 in the five-year land supply along. Secondly the inclusion of a windfall allowance from 24/25 is likely to see significant double counting should, be included only from 2027/28. Both these adjustments would result in the five-year land supply reducing by 360 dwellings.

Finally, adjustments are needed to take account of nutrient neutrality. As outlined above it would appear credits are only available to mitigate development in the Yare Valley and not those areas affected in North Norfolk. Whilst it is hoped mitigation will be available it is by no means certain. As such it is questionable that these sites should be considered deliverable. The HBF would suggest that a cautious approach is required and those sites requiring mitigation relating to nutrient neutrality are not included the five-year land supply. Based on Appendix B in EX006 this would push back delivery on COR01, FO1, FO2, HVO1/B, SH06, St19A, ST23/2 and PF/17/0729 where resolution of nutrient neutrality matters is pending. This would reduce supply in the first five years by a further 482 dwellings.

Therefore, the five-year land supply from adoption should be reduced by 842 dwellings to 2,253 dwellings and results in a 5-year land supply against a housing requirment of 531 dpa of 3.65 years or 3.39 years based on a requirment of 560 dpa.

**HOU Policies 3,4,6-9**

*7.3 Are these HOU policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so, what should these be?*

No comment

*7.4 Should Policy HOU3 also allow for Entry Level Exception Sites and/or First Homes Exception Sites to be consistent with national policy? If any market housing is included in an exception site scheme, should occupancy be restricted to those with a local connection?*

No comment

*7.5 Should Policy HOU6 (and others) insist on compliance with the North Norfolk Design Guide when this does not form part of the plan?*

No comment

*7.6 In Policy HOU7, should the NPPF term redundant or disused buildings be used? Are the criteria in the policy justified? Should the test be a substantial proportion of the structural elements and existing fabric would be retained?*

No comment

*7.7 Are Policies HOU8 and HOU9 justified in relation to the evidence and their effect on development viability? In Policy HOU8(2), do both criteria have to be met or just one? In Policy HOU9, should a sentence to address possible exemptions be included as in Policy HOU8?*

With regard to Part M4(2) the Government have stated that they plan to make this level of accessibility the minimum standard for new homes. Whilst this is still to be introduced if it is adopted prior to the conclusion of the examination the HBF would recommend that the policy be amended to avoid repetition of building regulations. It is also unclear within HOU8 whether the requirement for M4(3) applies to all homes or just those where the Council has nomination rights. It is important that the Council clarifies it position as Part M4(3) refer to both wheelchair adaptable homes, which are applicable to all tenures and wheelchair accessible homes which can only be required where the council has nomination rights.

In our representations the HBF raised concerns regarding the evidence base. The Council have now included more evidence in the update to Paper 7 on housing construction standards. This provides additional evidence based on the space standard in nearly 2,000 homes. Whilst the evidence does not suggest that there is an endemic problem of small homes in the Borough the HBF accept that there is evidence to support their application in NNDC. However, we would also suggest that some flexibility is included the plan to support development of hoes below spaces standards where these would enable the delivery of well-designed, high-quality homes.

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**Home Builders Federation**

**Matter 9**

**North norfolk Local Plan Examination**

**Matter 9: Delivering Climate Resilient Sustainable Growth (CC policies)**

***Issue: Whether the policies for delivering climate resilient sustainable growth are positively prepared, justified, effective and consistent with national policy.***

Questions:

*9.1 Are the CC policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so, what should these be?*

The HBF are concerned that CC3 and CC8 have been superseded by building regulations therefore parts of these policies are no longer required. These concerns are set out below.

*9.2 Does Policy CC2 provide appropriate guidance for the consideration of Renewable & Low Carbon Energy projects in the district? Are areas classified as moderate-high sensitivity in the Landscape Sensitivity Assessment SPD suitable for development in principle as proposed, and is the assessment sufficiently detailed to determine this? Should moderate-high sensitivity or less be reflected in Figure 5, which appears to be solely based on AONB & Broads designations? Are the other criteria in the policy justified and would they be effective? Has potential windfarm development at the* *district’s airfields been sufficiently assessed to justify the less restrictive policy?*

No comment.

*9.3 How do the energy efficiency standards set out in section 1 of Policy CC3 relate to current and potential future building regulations? Does it need updating? Are any differences from building regulations standards justified? What does ‘zero carbon ready’ by 2035 mean in practice? What are the implications for the cost of development?*

Part L of the 2021 Building Regulations that came into force in June 2022 will deliver a circa 30% reduction in CO2 on the 2013 Building Regulations. As such it is unnecessary for the council to include this requirement in it its local plan as the policy has been superseded by building regulations.

The Government is proposing that from 2025 new homes will have to meet the proposed Future Homes Standard. This will mean that homes will be prevented from using gas boilers and appliances meaning that they will become zero carbon as the national grid decarbonises. As set out in our statements to matter 4 the Future Homes Hub has undertaken some work to support and inform the implementation of the Future Homes Standard and have published evidence which indicates that for a three bedroomed end of terrace house the Future Homes Standard would add a 5% increase to per unit build cost compared to the 2021 Building Regulations.

*9.4 Is the requirement in section 2 of Policy CC3 for all proposals to be accompanied by a compliance statement justified? Does this include minor development, or should there be a threshold?*

Compliance statements must be proportionate to the scale of development. We would also suggest that it is not necessary to require development to address part b given that this will now be addressed through the building regulations.

*9.5 Is the requirement in section 3 of Policy CC3 for non-residential development over 250 sq m floorspace to achieve BREEAM ‘very good’ standard justified? What are the implications for the cost of development?*

No comment

*9.6 Is the requirement in Policy CC4 for compliance with any future local water efficiency standard justified when these are not currently known?*

No comment

*9.7 Do Policies CC5 and CC6 provide appropriate guidance for the management of change and relocation of existing uses within the Coastal Change Management Area (CCMA)? Do they provide sufficient flexibility for tourist accommodation businesses operating within the CCMA? How reliable is the CCMA designation, what assumptions are made in drawing it up and when might it be reviewed? Is the vulnerable within 50 years period justified in relation to potential blight and investment decisions? Should it be more flexible or relate to the use concerned? Is the ‘no net detrimental impact’ test justified when the development being replaced remains temporarily?*

No comment

*9.8 Does Policy CC8 provide appropriate guidance for the provision of electric vehicle charging points in new development? Are the proposed standards justified, how do they relate to the building regulations and what are the implications for the cost of development? Is the text in 3.8.3 and 3.8.7 justified in requiring compliance with any future County Council electric vehicle parking standards when these are not currently known?*

Standard for electric vehicle charging are now set out in building regulations being through the update part S of the Building Regulations. These came into force in June 2022. This approach provides the necessary consistency across the country as to what is required both in terms of the number of charging points but also the technical standard as to the type of charger to be used. As such the Council should delete the requirement for electric vehicle charging points set out in part 2 of this policy or state that residential development will be expected to meet the requirements set out in Part S.



**Home Builders Federation**

**Matter 10**

**North norfolk Local Plan Examination**

**Matter 10: Delivering Well Connected, Healthy Communities (HC policies)**

**Issue: Whether the policies to deliver well connected, healthy communities are positively prepared, justified, effective and consistent with national policy.**

*10.2 Does Policy HC1 need to be clarified for effectiveness? Is a reduction in the threshold for an HIA to 250 dwellings justified? Should there be a threshold for non-allocated sites to be justified? In (1), how do the two sentences relate together? In (2), how is ‘major development’ defined?*

The HBF did not comment on HC1 but would not consider a reduction in the threshold to 250 dwellings to be justified.

*10.3 Should Policy HC2 refer to the definition of major development in the NPPF rather than developments of 11 or more dwellings/1000 sq m? Are the open space requirements in Appendix 2 and Table 3 justified? How would financial contributions to off-site open space be calculated?*

No comment.

*10.4 Is all the land designated as open/green land on the policies map and thus within the scope of Policy HC2(4&5) justified? Areas subject to objection include land at The Pastures, Blakeney, land at Hempstead Road & A148 Holt, land at Sheringham House and land off Warren Road, High Kelling. Are any other sites the subject of objection? Can the Council provide plans of these sites. Is the wording of sections 4 & 5` justified and effective?*

No comment

*10.5 Is the wording of Policy HC3 justified and effective? In Policy HC3(2b), should criteria (a) and (c) be combined for clarity and thus effectiveness? Should criterion (b) be strengthened to demonstrate alternative modes of operation are not viable? Is it justified for the footnote to require marketing to comply with best practice guidance that does not form part of the plan?*

No comment

*10.6 In Policy HC4(1a), is it justified to require compliance with infrastructure requirements set out in supplementary planning documents that do not form part of the plan? In 4b, is it justified to require the highest viable level of affordable housing? Should there be a reference to Policy HOU2 which sets out affordable housing requirements? Should 6 state proposals not accompanied by a viability assessment will be required to be policy compliant?*

No comment

*10.7 Does the Plan Wide Viability Assessment (Document I11) properly assess the impact of the policies of the plan on the economic viability of development so as to not undermine the deliverability of the plan? (NPPF paragraph 34) Does it properly assess the costs of development including affordable housing, biodiversity net gain, energy efficient standards, accessible & adaptable homes, minimum space standards, electric vehicle charging and digital infrastructure?*

As set out in our statements on matter 4 the Council have published an updated viability assessment following the regulation 19 consultation which includes those policy costs that were missing from the earlier assessment. The only consideration not undertaken in the study is the impact of the Future Homes Standard that is expected to be introduced in 2025. The Government have recently announced a further consultation on these standards and whilst the final detail is not known some degree of sensitivity testing is necessary to ensure that development remains viable and deliverable across the plan period.

*10.8 Is the requirement for a Digital Infrastructure Connectivity Plan in paragraph 5.5.3 to assess compliance with Policies HC5 and HC6 justified for all proposals over 100 sq m?*

No comment.

*10.9 Is it justified for Policy HC7(4) to require compliance with the North Norfolk Design Guide when this does not form part of the plan?*

1. No comment.

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1. The ratios are all taken from the ONS Work Place Based Affordability Ratios published in March 2023. [↑](#footnote-ref-2)
2. Cap set at 40% above annual average annual household growth. [↑](#footnote-ref-3)
3. Capped at 40% above average annual housing requirment in existing relevant policies (400 dpa in Core Strategy Policy SS3) [↑](#footnote-ref-4)