



Sent by email to: waveneylocalplan@eastsoffolk.gov.uk

21/09/2017

Dear Sir/ Madam

Response by the House Builders Federation to the Waveney First Draft Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the Waveney 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.

Duty to Co-operate

The Council consider Waveney to be its own Housing Market Area (HMA) due to the relatively high self-containment in terms of both migration and commuting. Whilst there are clearly links to both the Norwich HMA and Ipswich HMA the Borough does have a high degree of self-containment in relation its housing market. However, would like to stress that this should not absolve the Council from co-operating with its neighbours should there be unmet housing needs in either of the adjoining HMAs. There are clear links and overlap between the HMAs and that delivery within Waveney could meet the needs of other authorities. The Council will need to work closely with its neighbouring authorities to ensure that these housing needs are addressed in full. If there are unmet needs in these Borough's the Council should make a commitment to review its Local Plan and consider whether further sustainable allocations could be made to support neighbouring HMAs.

Housing needs

The Council sets out in the draft local plan that its objectively assessed need for housing (OAN) is 8,223 new homes at 374 dwellings per annum. The recent publication of the consultation for the standardised approach to assessing housing needs suggests that whilst the Council's assessment of need is higher it is not significantly different. Given that this is still a consultation document only minimal weight can be given to its content at present. However, it does provide an indication as to what the Government considers to be an appropriate assessment of housing needs and how market signals should be taken into account. It also confirms that the Government attach significant weight to the robustness of the Household Projections as outlined in Planning Practice Guidance. It is therefore important that the Council continues to ensure that its own

assessment of needs are appropriate and in line with current national policy and guidance.

As such we would argue that the Council might need to consider an uplift to take account of the high need for affordable housing that has been identified in the SHMA. Part 2 of the SHMA identifies that the annual affordable housing need is for 208 additional properties, which equates to 55% of the annualised OAN. Given that PPG states that: *“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes”* and the Council has indicated that it would expect to see 35% affordable housing contributions we would expect the Council to increase its housing requirement in order to support the delivery of new affordable homes alongside market housing. We would therefore suggest that this level of affordable housing need is justification for increasing the Council total housing requirement.

Housing Supply

It would appear that the Council is looking to deliver its shortfall within the first five years of the plan, however, we would welcome clarification of this in future iterations of the Local Plan. However, we are concerned that the Council has not applied a lapse rate to its existing housing commitments. It is unlikely that all the housing on these sites will come forward either through sites not being brought forward or coming forward at a later date with reduced numbers. Good practice and our experience from other local plans would suggest that a lapse rate of at least 10% is applied to all existing planning permissions.

We would agree with the Council's conclusions in the 2016 statement on five-year housing land supply that a 20% buffer is required due to the Council's record of persistent delivery. On this basis, the Council considers that it currently has a 5.6 year housing land supply but this would fall to just 5.1 years if just 10% of units with existing permission do not come forward as planned. We consider this position to be marginal and the Council may need to consider more smaller allocations earlier in the plan period to bolster their current supply, as well as taking positive steps to support and facilitate the delivery of its proposed strategic allocations at the earliest opportunity.

Policy WLP8.2 Affordable Housing

As there is no viability evidence published alongside the plan we cannot comment on the appropriateness of the proportion of affordable housing that is expected on appropriate sites. However, whilst we appreciate that the Council has recognised that the affordable housing contributions may impact on the viability of some development it is important that this is set out in policy not just the supporting text. We would suggest that at the end of the first sentence of this policy the words “where viable” are inserted.

Optional building standards

The Council have set out in both policy WLP8.1 and WLP8.28 its intention to apply the optional building standards for access and water efficiency. Planning Practice Guidance

requires evidence on both needs and viability before the optional technical standards for housing are implemented and at present there is insufficient evidence on both needs and viability to justify these standards. Until this is undertaken the Council's policies on these housing standards cannot be considered sound.

We trust that these issues will be considered carefully by the Council and look forward to further consultation on the next iteration of the Local Plan. I would also like to be placed on your consultee database and receive updates on any further consultations about the emerging Local Plan.

Yours faithfully

Mark Behrendt
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616