

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

30/09/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Great Yarmouth Draft Local Plan Part 2

Thank you for consulting the Home Builders Federation (HBF) on the Draft Local Plan Part 2. 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.

In producing a part 2 local plan to its adopted Core Strategy the key underlying principle of the document should be to ensure that the objectives of the Core Strategy are met. In relation to housing delivery the total requirement identified for the Plan period 2013-30 amounted to 7,140 dwellings of which 4,396 were identified as either commitments proposed strategic allocations. This then required a further 2,744 dwellings to be identified in the Local Plan Part 2. However, in the light of the changes made by the Government to the standard methodology and the latest household projections the Council have decided to reduce its housing requirement in the part 2 local plan. Our concerns regarding the position taken by the Council in relation to this decision are set out below.

Approach the standard method

The Council recognise in the Part 2 Local Plan that the Government have stated that they will amend the standard methodology to ensure that it continues to meet its target of delivering 300,000 homes by the mid-2020s. As such the Council's decision to reduce its housing requirement as part in this plan will need to be revisited depending on the approach that is due to be proposed and consulted on later on this year.

We are also concerned that the Council seem to be deriving a minimum housing target for the whole 2013 to 2030 plan period using the 2016 based household projections in combination with the standard methodology. It would seem that at paragraph 2.1.1.5 the Council are looking to use the standard method and the latest population projections to assess what housing delivery would have been from 2013. This is not a sound approach and seeks to overlap its evidence and approach to assessing housing needs across two separate planning policy frameworks. This provides a clear indication of the lack of thought that has been given to this decision to try and apply different approaches to needs assessment in what is effectively a single plan.

Given the uncertainties over the standard methodology and the Council's interpretation of this method in considering past needs we would suggest that the only sound approach to preparing the part 2 local plan is for the Council to meet its housing requirement set out in its Core Strategy. The Council's current approach is an attempt to reduce its requirement to reflect its poor delivery in the past and its failure to deliver the right sites to meet the housing needs of its population. We would suggest the only sensible approach is to prepare a part 2 local plan that meets the needs set out in the core strategy.

Amending Core Strategy through the part 2 local plan

As set out above the part 2 local plan should seek to deliver the part 1 Core Strategy. However, the Council have made the decision not to deliver the expectations for housing delivery in the part 1 local plan but to reduce these on the basis of the latest data and the changes to national policy. The Council's state that it wants to ensure that its local plan is up to date with national policy and whilst we recognise the importance of having a policy compliant local plan it is important to remember that a housing requirement above the standard method would not be considered unsound. Essentially there is no need to reduce the housing requirement in order to maintain a sound plan when assessed against the revised National Planning Policy Framework and Planning Practice Guidance. Both these documents establish that the housing need figure arrived at using the standard methodology is a minimum figure but that there may be circumstances where a local planning authority may need to plan for more homes. One such scenario outlined is where the LPA needs to deliver more market homes to secure the necessary provision of affordable housing. This is recognised as a concern by the Council in the part 2 local plan yet the Council have decided not to continue with its original assessment of housing need that would enable to the Council to secure more of the affordable housing it clearly needs.

Therefore, in amending its Core Strategy through the local plan the Council will not deliver on one of its key objectives of the Core Strategy and as such its soundness must be questioned. The housing requirement is central to other aspects of the plan including jobs growth and its regeneration objectives and by reducing its requirement the consequential impacts must be fully understood. There must also be concerns that the approach taken could be legally challenged as the Council have looked to amend its primary development plan document through a subsidiary plan rather than through a local plan review which could have considered the impacts of any changes in the round.

Affordable housing

As outlined above the Government have stated the standard method is the starting point for establishing the housing requirement. As with the previous planning practice guidance the Government continue to require Councils to consider whether the housing requirement should be increased to better meet the need for affordable homes. Whilst Great Yarmouth has relatively low house values especially it must be remembered that affordability is relative to local incomes. Despite these lower house prices, the lower quartile affordability ratio for the area is 6.28. It is clear that house prices for many in the area remain unaffordable and, as the Council have acknowledged, has led to high level

of need for affordable housing. However, the total number of affordable houses built in the 4-year period is very low (18) and it has clearly failed to meet the 438 homes the Council estimate is required to meet its affordable housing needs. However, rather than increase its requirement to better meet its needs for affordable homes it is noted that the Council are reluctant to do this as it would:

“..... increase the likelihood of the Borough continuing to have its Local Plan policies undermined by NPPFs so called “presumption in favour of sustainable development” as a result of the greater challenge in meeting the 5 Year Housing Land Supply and Housing Delivery Test”.


This statement makes it clear that the Council really has no intention of trying to follow national policy and guidance in meeting the needs for affordable homes but would rather seek to protect its land supply and maintain housing delivery at lower levels regardless of the consequential outcomes. We would suggest that this approach is unsound as it is inconsistent with national policy. The Council must not reduce its current requirement through the part 2 local plan as this will mean even less of the Council needs for affordable housing will be met.

Conclusion

The approach being taken by the Council is not the positive one that the Government expects of Councils when planning for the needs of their areas. The Council have made the decision to reduce their housing requirement within a part 2 local plan without the thorough and necessary consideration as to its impacts on economic growth or affordable housing delivery. Both of which are required when preparing a local plan. The only sound approach that can be taken by the Council is to prepare a part 2 local plan that meets the development needs set out in the Core Strategy. This will secure the necessary delivery to meet the Council's objectives and ensure that it has sufficient land to meet its needs. If the Council then wishes to amend its position it should undertake a comprehensive review of both parts of its local plan to ensure that development needs are considered as a whole across an appropriate timescale.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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