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29/04//2019

Dear Sir/ Madam

### **Response by the House Builders Federation to the Kings Lynn and West Norfolk Local Plan Review Local Plan consultation**

Thank you for consulting the Home Builders Federation (HBF) on the latest consultation on the review of the 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. Outlined below are some brief comments on the plan.

#### **Strategic Growth and Housing Distribution**

The Council has taken the decision to amend its housing requirement through this local plan which reduces the Borough's housing requirement from 660 dwelling per annum (dpa) to 555 dpa. Whilst the HBF supports the introduction of the standard method it is important to note that paragraph 60 of the NPPF states that this should be considered the starting point for assessing housing needs. The Government has continued to reiterate its aspiration to significantly boost the supply of homes and to support a housing market that delivers 300,000 homes – a level of delivery that will not be achieved if each authority delivers at the level set out in the standard method.

It will therefore be important for the Council to consider whether the level of housing growth being proposed will allow the Council to meet its aspirations with regard to the economic growth of the area as well as delivering sufficient affordable housing. We note that the latest review of affordable housing needs was published in 2013. This is some time ago and it will be necessary for the Council to revisit this evidence to ensure that it is planning for an appropriate level of affordable housing. However, we note that this evidence suggests housing needs is 27% of total needs. If this continues to be the case Council will, in line with paragraph 2a-024-20190220 of Planning Practice Guidance, need to consider increasing its supply of development land to meet its affordable housing needs.



The Council state that it will plan for an additional 15% above local housing needs to ensure flexibility and the deliverability of the plan. Whilst we support this decision which recognises that not all sites will deliver as expected we would suggest that the Council plans for a 20% buffer that will ensure that it will have sufficient land should delivery fall below 85% and require the Council to have a 20% buffer when calculating its five year housing land supply. Such an approach would ensure the Council has the added certainty that the plan will continue to be considered up to date.

### **Policy P16 Design and Sustainable Development**

This policy seeks to introduce the optional technical standards with regard to water efficiency and the National Described Space Standards. It will be important for the Council to ensure it has the necessary evidence to support the introduction of both these standards in line with PPG. We are concerned that the impacts of these standards are not fully considered by Councils. For example, some of our members consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market. We do not consider that such policies are in general required to deliver the homes people need and that local needs can be met without the introduction of the nationally described space standards.

### **Policy LP25 Affordable housing**

As outlined above the evidence on affordable housing needs will need to be updated to ensure both the overall housing requirement and policy LP25 are justified. It will also be necessary to update the Council's evidence with regard to viability as paragraph 7.1.5 outlines that this evidence was last revised in 2009. It will be essential for this evidence to consider all the policy costs being placed on development as required by paragraph 34 of the NPPF in order to ensure that the cumulative burden of the policies in the plan do not undermine its deliverability. In particular it will be important to ensure that any affordable housing requirements are not aspirational and lead to site by site negotiation on such contributions which would be contrary to paragraph 57.

The Government has established in both the NPPF and PPG that negotiation on a site by site basis should be limited and that decision makers must be able to assume that policy compliant development is viable. It is therefore vital that the viability evidence is sound and that the policy in the local plan reflects this evidence. As such it will be important for the Council to engage closely with developers in their areas in the development of their viability evidence to accurately reflect the costs of developing within the Kings Lynn and West Norfolk area. We would welcome the opportunity to discuss the preparation of the viability evidence and the engagement with the house

building industry which paragraph 10-002-20180724 of PPG establishes as is a key requirement in the preparation of the local plan.

**Policy LP31 – Delivering affordable housing on phased development**

With regard to part 1 it is not clear what the policy is seeking to achieve with regard to the delivering of affordable housing on a phased development. It would appear that the Council is seeking to ensure that the affordable housing contribution applies to the whole of the site and prevent incremental phasing below the policy threshold in LP25. However, there may be circumstances where sub division of a site could lead to the affordable housing requirement being delivered prior to market housing leaving remaining phases to deliver solely market housing. There could be the unintended consequence of decision makers seeking contributions for affordable housing on later phases of development as a consequence of this policy. We do not believe this is the intention of the policy, but we do recommend that the policy be rewritten to provide clarity.

We hope these comments are helpful and if you would like to discuss these issues further please contact me.

Yours faithfully



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