



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 site 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 requirement to bring forward additional sites to address any shortfalls.

Secondly, the Council will need to clarify its position with regard to the housing requirement. 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 requirement 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 requirement.

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

A. Requirement	456 dpa	480 dpa	531 dpa	560 dpa
B. Five-year requirement (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 requirement 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 requirement 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 requirement of 531 dpa of 3.65 years or 3.39 years based on a requirement 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 homes below spaces standards where these would enable the delivery of well-designed, high-quality homes.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E