



Local Plan for the Broads

Broads Authority response to Matter 3 – Objectively assessed need and the housing requirement June 2018

Issue – Is the identified objectively assessed housing need soundly based and supported by robust and credible evidence? Is the overall housing requirement in the Plan justified and consistent with national guidance?

[Policy PUBSP15 part a]

Questions

Objectively assessed need

- a) Do the identified Central Norfolk, Great Yarmouth and Waveney Housing Market Areas (HMA) provide a robust and appropriate basis for assessing housing needs, insofar as they relate to the Broads Executive Area?
- i. *Yes. The Central Norfolk SHMA 2015 (EB44) defines the Housing Market Area for Central Norfolk in section 2 (page 24 onwards). The Norfolk Strategic Planning Framework sets out the agreed Housing Market Areas for Norfolk including the Central Norfolk Housing Market Area and Great Yarmouth Housing Market Area (see page 17 and 18 of LP-SUB10). The Waveney Housing Market Area has been justified in the Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas [Part 1](#) | [Part 2](#) (May 2017) in particular at section 2 of part 1 (from page 10).*
- b) Do the locally derived population and household projections in the Central Norfolk Strategic Market Housing Assessment (SHMA) (2017) provide a suitable starting point for establishing objectively assessed housing need (OAHN) in the Broads?

[The Authority is requested to provide further detail in their response on the methodology/workings as follows:

- Information on how age profile was applied to population estimates from the 2011 Census.
- Explain how population estimates for each authority area within the Broads were 'updated' by apportioning 2015-mid-year estimates, and why two large sub-areas were used.
- Information on how natural change and migration rates were applied, and the data source.
- Outline the reasons and justification for applying the headship rate from the Central Norfolk SHMA across the whole Broads area, and supply details of the workings]

- i. *Details of the process for identifying the locally derived population and household projections for the Broads are included in Appendix 3 of the Central Norfolk Strategic Market Housing Assessment (SHMA) (2017) (EB5). Rather than reiterate the points made in that document we will instead focus on the sub-questions set out below.*

Information on how age profile was applied to population estimates from the 2011 Census.

- ii. *Age bands within the Broads was provided by the 2011 Census in a National Parks dataset (2011 Census: Key Statistics for national parks in England and Wales" KS102EW), giving ages within 16 bands. This is a bespoke dataset produced only for planning authorities who are part of the National Parks family.*

Explain how population estimates for each authority area within the Broads were 'updated' by apportioning 2015-mid-year estimates, and why two large sub-areas were used.

- iii. *The key data used to update the apportioning was the population mid-year estimates for 2015 for the Broads which was produced in 2016 by the Office for National Statistics. This overall figure for the Broads was then apportioned to each of the local authority areas by age and gender following the pattern of the 2011 Census. There are no official statistics showing the breakdown of households by local authority area for the Broads, but the Broads Authority was able to derive these figures. Therefore, the model took the Broads population and distributed any changes between 2011 and 2015 in a manner consistent with the population for each area in 2011.*
- iv. *This process was undertaken at a local authority by local authority basis. While Appendix 3, paragraph 13 states that this was undertaken at 2 sub-areas, covering those LA's that were within the overall Central Norfolk study area, and those outside (Gr Yarmouth and Waveney), this was a grouping of the data to make the data more robust by reducing the effects of small data and rounding.*

Information on how natural change and migration rates were applied, and the data source.

- v. *The projections in the Central Norfolk Strategic Market Housing Assessment 2017 use the natural change rates for each of the local authorities, that is the data underlying Sub-national Population Projections (SNPP) 2014. This data is explored in detail between pages 14 and 36 of the Central Norfolk Strategic Market Housing Assessment 2017, alongside the information on migration. We would note that the population of each local authority area within the Broads had the rates for that local authority area applied to it. Therefore, there is not one, but 6 different rates applied across the Broads area.*

- vi. *In the Central Norfolk SHMA 2017, the estimates for migration are based upon the difference between population growth and natural change. Therefore, we take the population growth of a local authority between 2005 and 2015, subtract natural change and any remaining change in population must be due to migration. That migration estimate was then applied to the forward projections. This process was then applied to the Broads by taking the migration figures for each local authority and applying these on a proportionate basis to the Broads.*

Outline the reasons and justification for applying the headship rate from the Central Norfolk SHMA across the whole Broads area, and supply details of the workings]

- vii. *The Central Norfolk SHMA 2017 did not apply a single headship rate across the whole of the Broads area. Instead, local authority level headship rates were applied to the relevant data for each of sub-areas of the Broads.*
- viii. *To summarise the process as discussed in paragraphs 13 and 14 of Appendix 3 of the Central Norfolk SHMA 2017, taking the North Norfolk part of the Broads as an example, the SHMA ;*
- *Took the population for the Broads in North Norfolk in 2011 and adjusted this in light of the mid-year population estimates in 2015 and ensured that the total change in the Broads was proportionately distributed across the local authority areas;*
 - *Future birth and death rates for this area of the Broads were taken from the North Norfolk 2014 based SNPP data;*
 - *Migration to area was calculated by taking the projected future migration to and from North Norfolk and assuming that this applied proportionately to the Broads; and*
 - *The population projection generated by this process then had the headship rates for North Norfolk applied to them.*
- c) Is the application of a vacancy and second homes rate of 24.5%, based on Council tax data, justified and robust? What period does this data relate to?
- ii. *Council Tax records of the six districts were checked for holiday and second homes (April 2015). The records were assessed manually from the large amount of data provided to the Broads Authority. South Norfolk data is based on UPRN whereas Waveney, North Norfolk, Norwich, GYBC and Broadland are based on postcodes. The addresses were manually checked to ascertain if they are in the Broads or not, as not all postcodes areas are entirely within the Broads. The figure is an estimate and gives an indication only.*
- iii. *This information reflected the situation as at April 2015.*
- iv. *As stated in the SHMA (EB5, Page 150, paragraph 14) 'this rate was used as it is based on Broads local area data and therefore preferential to using district vacancy rates, which would be too low for the Broads, for consistency with the previous SHMA, and because the vacancy and second home rate figures in the previous SHMA were agreed'.*

- d) Figure 82 in the SHMA indicates that other factors have been taken into account in determining OAHN, including suppressed household formation rates, employment trends and market signals. What assumptions and judgements have underpinned this process as it relates to the Broads area, and are these soundly based?
- i. *Figure 82 of page 97 of the Central Norfolk SHMA 2017 shows the stages in deriving the OAN for the Broads. This takes the demographic projections discussed in question b) and applies a series of adjustments as required by the NPPF and Planning Practice Guidance to translate these projections in to an OAN figure. These adjustments include:*
 - ii. *Second homes and Vacancies. For each planning authority in Central Norfolk a separate vacancy rate was used to reflect local circumstances as discussed at paragraph 4.86 of the Central Norfolk SHMA 2017. The vacancy and second home rate of 25.4% which was applied to the Broads was based on second home and holiday home work by the Broads Executive Authority which involved a detailed assessment of Council Tax records. This rate was used as it is based on Broads local area data and therefore preferential to using district vacancy rates, which would be too low for the Broads given its extremely high number of second homes.*
 - iii. *Adjustment for concealed families and homeless households. A figure of 9 households, which gives 12 dwellings when the vacancy and second home rate is applied, was added to address the needs of these groups as shown on page 97, Figure 82 of the Central Norfolk SHMA 2017. The reason for adding the needs of each group is that they would not be reflected in the household projections because they do not currently appear as households*
 - iv. *The uplift to the OAN across Central Norfolk for concealed families and homeless households has been arrived at having regard to the following datasets:*
 - *Homeless Households – Households accepted as homeless and in priority need. Source CLG P1E returns March 2006 to March 2016 (see Figure 47)*
 - *Concealed Households – Census (2001 and 2011) (see Figure 48), along with data for Sharing Households and Multi-Adult Households (see Figures 39 and 50).*
 - *Overcrowding – Census (2001 and 2011) (see Figure 51) and trends analysed with the English Housing Survey Data (see Figures 52 to 54).*
 - v. *The figure for the Broads is an apportioning of the figures for the Local Authorities which contain the Broads because there is no local specific data for the Broads area. Given that the Broads is not a housing authority they do not hold records for homeless households and concealed families in the 2011 Census are not reported for the Broads.*

- vi. *Market Signals. In relation to market signals the national Planning Practice Guidance states that the household projections should be adjusted to reflect appropriate market signals. Stating that relevant signals may include: Land and House Prices, Rents, Affordability, Rate of Development and Overcrowding. The Central Norfolk SHMA 2017 includes an uplift of 10% to reflect this as discussed on pages 90 to 92. It should be noted that a reduction of 1.5% (953 dwellings) has occurred in relation to suppressed household formation rates: concealed families and homeless households to avoid double counting. This leads to a total uplift for market signals of 8.5%.*
- vii. *The approach to uplift has had regard to other comparator areas in England, and the accepted approach at their Local Plan examinations, this is set out in paragraph 4.69 and includes;*
- *Cheshire East – 3%*
 - *Luton and Central Bedfordshire – 10%;*
 - *Stevenage and North Hertfordshire – 10%;*
 - *Buckinghamshire – 15%; and*
 - *Camden – 20%;*
- viii. *As such the approach to 10% uplift is considered to be justified when evaluated against the uplifts assessed for comparator areas and also against a series of adopted Local Plans.*
- ix. *For the Broads, the consequences of 10% uplift are the addition of 26 dwellings to the OAN, but this figure includes the 12 dwellings per annum to address the needs of concealed families and homeless households.*
- x. *Jobs and Workers. For the Central Norfolk SHMA 2017, the East of England Forecasting Model (EEFM) has been used alongside the projections on dwelling increases to consider jobs growth for each of the local authorities within Central Norfolk (at pages 92-94).*
- xi. *The demographic projections in the OAN for Central Norfolk show a higher increase in workers than suggested through the EEFM (paragraph 4.82 page 94). As the OAN is based on the demographic projections for Central Norfolk it is considered that the OAN will provide sufficient new dwellings to cater for the new jobs expected in Central Norfolk over the plan period. On this basis there is no need for additional dwellings to be provided to accommodate additional workers.*
- xii. *Please note, at Figure 96 on page 128, the Central Norfolk SHMA 2017 considers a policy on position relating to the Greater Norwich City Deal. This shows that if the Broads were to contribute to the uplift in dwellings*

required to accommodate the workers for the City Deal, then the housing requirement of the Broads would rise by a further 14 dwellings over the plan period from 287 to 301 dwellings in total.

- e) Is OAHN clearly defined in the draft Plan, in terms of the whole Broads area and its constituent HMA areas?
- f) Is the Authority's housing requirement clearly defined in the Plan, as it applies to the whole Broads area and its constituent HMA areas? Does it take account of the Memorandum of Understanding with Great Yarmouth Borough Council?
 - i. *As set out in the Housing Supply Topic Paper (EPS6) policy PUBSP15 a) will need to be amended. The changes required need to refer to the residual requirement in the Borough of Great Yarmouth as 46 dwellings, and the footnote 79 needs to be changed to reflect this and clarify that the actual residual need is 38 when windfall permissions and completions as at April 2018 are taken into account.*
 - ii. *Turning to the representation from the HBF (LP-PUB4, page 63, rep number 214) which proposes that housing requirements are broken down to enable monitoring, whilst the OAN for each district is included in a table and there is another table that sets out which districts are in which HMA on the same page of the Local Plan (page 99), proposed change 63 would address their concerns (LP-SUB2).*
 - iii. *Whilst Great Yarmouth Borough Council have agreed to meet the entire need of the Broads Authority part of the Borough (66 dwellings), the Authority was able to allocate sites at Thurne and Stokesby amounting to 20 dwellings. The Borough has therefore committed in reality to meeting the outstanding need for 46 dwellings. Taking into account windfall permissions and completions amounting to 8 dwellings since April 2015, the actual residual need is 38 dwellings.*
- g) Is the provision of part of the Authority's housing requirement outside the Broads area (within Great Yarmouth Borough) in line with paragraph 14 in the NPPF, and supported by evidence which balances the need for development against the special status of the Broads Area and/or particular environmental/landscape constraints in the Broads area that lies within Great Yarmouth Borough? What alternative strategies were appraised, and why were they discounted?
 - i. *When considering how the need in Great Yarmouth Borough could be met, the Authority considered the characteristics of the Broads part of Great Yarmouth. See Section 10 of the Housing Topic Paper 2017 (EB13) (first produced in 2016). Also see Great Yarmouth Borough Council's response to the Issues and Options consultation (LP-IO3 page 63) which says 'The Borough Council considers that the constraints and special qualities of the Broads mean that it is unlikely to be desirable to provide significant housing within the Broads. It accepts that some, perhaps all, of any need arising within that part of the Broads within Great Yarmouth Borough should be met in those parts of the Borough outside the Broads'.*

- ii. *The map at Appendix A shows the parishes that are in Great Yarmouth Borough and the Broads. The built up areas are shown as well. It can be seen that the only areas with built up areas of the parish well related to the main settlement in the Broads are Thurne and Stokesby and these two settlements have housing allocated to them (PUBTHU1 and PUBSTO1).*
 - iii. *Furthermore, when looking at the settlements included on the map and comparing them against the scoring of the sustainability of the settlement (see EB28 page 4 and 5) it can be seen that the settlements in Great Yarmouth Borough that were assessed tend to lack services and facilities.*
 - iv. *Taking into account the characteristics of the part of parishes in the Broads part of Great Yarmouth Borough as well as the services and facilities they offer, the Authority feels that the approach of the Local Plan is in line with NPPF paragraph 14.*
- h) In determining the housing requirement, did the Authority consider whether an uplift should be made to i) provide additional affordable housing? ii) meet additional housing needs arising from higher jobs growth targets linked to the City Deal (as outlined for the Broads in figures 96 and 105 in the SHMA)?
- i. *Our district councils undertake the housing function for the Broads. No requests have been made by our districts in relation to uplift to provide for additional affordable housing.*
 - ii. *It is important to note the typical size of dwelling applications that the Authority receives as well as the size of the allocations in the Local Plan. The Housing Topic Paper (EB13, Appendix A, page 10) assessed the size of applications received between June 2006 and June 2016 and found that if all applications are included (including the large scale allocations at Hedera House, Pegasus, Ditchingham Maltings and the Utilities Site) the average number of dwellings per application is: 4.12 dwellings. If the large applications are removed and we focus on windfall (unallocated sites) then the average number of dwellings per application is: 1.94 dwellings. Considering the NPPG says that in the Broads affordable housing can only be sought on dwelling schemes larger than 10 in size, it is very rare that schemes meet that threshold and therefore be required to provide affordable housing.*
 - iii. *The Authority has taken the approach of introducing affordable housing off site contributions for schemes of 6-10 dwellings in policy PUBDM33. The NPPG does not include the Broads Authority when referring to where the national 6-10 threshold policy applies; it refers to rural areas described under [section 157\(1\) of the Housing Act 1985](#), which includes National Parks and Areas of Outstanding Natural Beauty. So rather than increase*

the housing target, the Authority has sought to lower the threshold at which affordable housing contributions can be sought.

- iv. Turning to the City Deal, the Authority did not consider using the jobs-led growth figure. This is because of the significant oversupply in housing over the plan period through permissions, completions and allocations.*
- v. If the higher figure in the SHMA is used (EB5, page 129), which is 301¹ dwellings rather than 286² dwellings, then the impact on over supply and five year land supply is as follows. Please note that the OAN for Great Yarmouth and Waveney does not change under the jobs-led scenario:*

	<i>Based on long-term migration trends</i>	<i>Based on jobs-led growth.</i>
<i>Over supply in Central Norfolk Area</i>	<i>23.92%</i>	<i>13.5%.</i>
<i>Five year land supply using the Liverpool approach</i>	<i>11.41 years</i>	<i>10.51 years</i>
<i>Five year land supply using the Sedgefield approach</i>	<i>16.17 years</i>	<i>13.77 years</i>

- vi. This shows that there is still a five year land supply on adoption of the Local Plan and that there is still an oversupply in Central Norfolk of over 13%.*
- vii. Of relevance to these questions is the over supply data calculated using data in Appendix A of the Housing Supply Topic Paper EPS6. This shows the following over provision of housing as a result of the allocations, permissions and completions since April 2015 and over the Local Plan period to 2036.*
 - a) In Central Norfolk HMA area: 23.92% over provision.*
 - b) In Waveney HMA area: 50.9% over provision*
 - c) Across the Broads Authority Executive Area: 31.7% over provision.*
 - d) In the Great Yarmouth HMA area there is a Duty to Cooperate agreement in place that effectively covers 46 dwellings. As well as 20 dwellings allocated in the Local Plan, 4 were completed and 4 permitted between April 2015 and March 2018. This indicates an over provision against the 20 dwellings housing target of 40%.*

¹ 271 dwellings taking into account the Duty to Cooperate Agreement with Great Yarmouth Borough Council as set out in EPS5 and questions e and f of this matter.

² 246 dwellings taking into account the Duty to Cooperate Agreement with Great Yarmouth Borough Council as set out in EPS5 and questions e and f of this matter.

- viii. *To summarise and conclude. In terms of an uplift to result in more affordable housing, the Authority has reduced the threshold for affordable housing contributions to reflect the average size of schemes that tend to seek permission in the Broads. In terms of uplift to reflect the City Deal, the Authority significantly over provides housing numbers through permissions, completions and allocations.*

Appendix A: Map showing the buildings in Great Yarmouth Borough and in the Broads part of Great Yarmouth.

Great Yarmouth

- Broads Authority Boundary
- OS MasterMap Buildings (2018)

