



Local Plan for the Broads
Broads Authority response to Matter 4 – Housing land supply and delivery
June 2018

Issue – Is the overall housing requirement deliverable over the Plan period, and can a five year supply of housing be achieved?

**[Policy PUBSP15 part a
Appendix K housing trajectory]**

Questions

a) Is the Authority's approach to the calculation of land supply robust and based on sound evidence? What is the reason for the non-inclusion of i) a windfall rate, and ii) a lapse rate (relating to outstanding permissions and/or proposed allocations)?

- i. *Yes. See Housing Supply Topic Paper (EPS6) for the anticipated delivery timeframe of schemes.*
- ii. *The delivery of net new dwellings is variable and the numbers are small meaning that they are subject to very local influences, so a windfall allowance cannot be justified. The following table shows the windfall from each year from 2014/15. Prior to 2014/15 monitoring period, the Authority did not monitor completions.*

2014/15	2015/16	2016/17	2017/18
6	3	2	11

- iii. *Turning to lapse rates, a site with planning permission is considered deliverable in the context of footnote 11 in the NPPF. The Housing Supply Topic Paper (see section 2 and 3 of EPS6) shows the justification for when the sites allocated will come forward. Whether lapse rates are included or not the Local Plan provides over and above the OAN over the plan period.*
- b) How were potential housing sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others?
- i. *The following sites for housing were rolled forward from the Sites Specifics Local Plan 2014: PUBOUL2, PUBNOR1 and PUBTHU1.*
 - ii. *The sites at PUBOUL2 and PUBTHU1 have planning permission.*

- iii. *PUBSTO1 came forward through the Preferred Options consultation and was assessed in document EB17.*
 - iv. *PUBHOV3 is allocated for various uses and a pre-application enquiry for one of the buildings covered by the policy indicated plans for 6 dwellings; although the three sites together have the potential for more dwellings. This was allocated because the areas of brownfield land are either run down, have been vacant for a long time or the Authority considers more can be made of the site than its current use.*
 - v. *All sites were assessed using the HELAA methodology (EB12) and further commentary on sites put forward is set out at document EB37.*
 - vi. *All allocated sites were subject to sustainability appraisal (see LP-PO2 and LP-PUB2).*
 - vii. *Turning to sites put forward for consideration for residential dwellings but which were rejected. These sites were put forward through the Issues and Options and Preferred Options consultations: PUBGTY1 (Marina Quays, Great Yarmouth), Land at Church Close, Chedgrave, Land at Thunder Lane, Thorpe St Andrew and Broadland Nurseries, Ormesby St Michael.*
 - viii. *These were assessed using the HELAA methodology (EB12) and further commentary on sites put forward is set out at document EB37. The Land at Thunder Lane was subject to its own assessment: EB35. The Land at Church Close, Chedgrave was also subject to its own assessment: EB1 (in the interests of completeness, the Inspector is advised that the Chedgrave site was granted planning permission for two dwellings in February 2018)*
 - ix. *All rejected sites were subject to sustainability appraisal (see page 155 and 156 of LP-PUB2).*
- c) Are the estimated capacity, delivery and phasing rates for the housing allocations soundly based and justified? (as set out in the Authority's Housing Supply Topic Paper – May 2018).
- i. *Yes. The phasing assumed for the sites is justified within the Housing Supply Topic Paper (see section 2 and 3 of EPS6). The Authority has contacted landowners to confirm the anticipated delivery timeframes should the allocation in the Local Plan be adopted. Please note that for the Utilities Site, Norwich City Council, as the lead Local Planning Authority, was contacted regarding progress on the site. Following these conversations which happened in the last three weeks, the delivery timeframe included within the Local Plan will need to be changed for some allocations; the anticipated delivery timeline is given in the Housing Supply Topic Paper.*
- d) Has sufficient flexibility been provided in the housing trajectory to ensure that the overall housing requirement over the Plan period is met and exceeded?

- i. *As set out in the Housing Supply Topic Paper, through completions, permissions and allocations, the housing requirement is exceeded as follows:*
 - 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 which means that the Authority has provided for more housing that it is required to do under the agreement, with the overprovision against the 20 dwellings housing target of 40%. Whilst the agreement means that much of the need is planned to be provided outside of the Broads area, clearly any housing which can be delivered within the Great Yarmouth area is helpful.*
 - ii. *The phasing assumed for the sites is justified within the Housing Supply Topic Paper (see section 2 and 3 of EPS6).*
- e) Is the Authority's approach to calculating five year land supply robust and in line with national policy and guidance? Should the Plan include reference to the Authority's assumptions and parameters and the five year supply position?
- i. *See Five Year Land Supply Statement (EPS6b) which uses both the Liverpool and Sedgefield approach. The Authority considers this robust and in line with national policy and guidance.*
 - ii. *If the Inspector is minded to include information relating to the five year land supply in the Local Plan, that can be accommodated.*
- f) Will a five year supply of housing land be provided on adoption and maintained? Does the Plan allow sufficient flexibility to respond to changing circumstances?

- i. *As set out in the Five Year Land Supply document (EPS6b section 5.1, page 4), there is a 5 year land supply on adoption:*

Area	Liverpool	Sedgefield
Broads Authority Executive Area	11.41 years	16.17 years

- ii. *Again, as set out in document EPS6 (section 7.2 and 7.3 page 9 and 10), this five year land supply is maintained but not for three of the years over the plan period, if the Liverpool methodology is used and delivery is assessed against the housing target averaged over the plan period.*
- iii. *The Housing Trajectory in EPS5 indicates a stepped trajectory which will result in a maintained five year land supply as delivery will be assessed against actual planned housing target rather than annual average. The Local Plan commits the Authority to a review of the Local Plan 18 months*

after adoption. This review timeline may be prudent anyway to reflect the release of the new NPPF. See 7.3.2 of EPS6.