
Breckland Local Plan Examination

Local Plan Examination
Hearing Statement – Matter 3

On behalf of
Abel Homes Ltd



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1. Introduction

1.1. This Hearing Statement has been prepared by Savills (UK) Ltd on behalf of Abel Homes Ltd.

1.2. Abel Homes is a family run local housebuilder based in Watton, Norfolk. The award winning company is known for its high quality homes. Abel Homes has built homes across Breckland and is committed to the continued delivery of new homes at their sites across the District.

1.3. Abel Homes has actively participated in the preparation of the Local Plan for Breckland for a number of years. Savills will attend the Hearing sessions on Matter 3 to expand on the representations made to the Regulation 19 consultation and the content of this Statement.

2. Matter 3 – Housing: the objectively assessed need for housing and the housing requirement (Policy HOU 01)

2.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments

Question 3.1: Is the Objectively Assessed Need (OAN) figure of 612 dwellings per annum (dpa) as identified in the Strategic Housing Market Assessment (SHMA) justified?

2.2. No. Within the response to the Regulation 19 Local Plan Consultation, attention was drawn to the DCLG 'Planning for the right homes in the right places' (September 2017) consultation document which suggested a new approach to the identification of housing need. At that time, DCLG suggested a housing need of 680 dwellings per annum over the period 2016 to 2026.

Question 3.2: Does the SHMA methodological approach to establishing the OAN follow the advice set out in the Planning Practice Guidance (PPG) (under the heading 'Methodology: assessing housing need')?

2.3. The Council's approach is generally consistent with the methodology set out in the Planning Practice Guidance with the exception of the use of a ten year migration trend.

Question 3.3: The OAN is based on applying a 10 year migration trend (2005 to 2015) to the ONS 2014-based sub-national population projections. Why is this more appropriate than the 'starting point' estimate provided by the latest Government household projections? What is the difference from the 2014 based projections?

2.4. It is considered that the Council should give due regard to the starting point of the official population and household projections. Specific reference is made to take account of "*the most recent demographic evidence including the latest Office for National Statistics population estimates.*" (Planning Practice Guidance: 017 Reference ID: 2a-017-20140306). These projections are described within the planning practice guidance as being statistically robust.

2.5. Whilst it is recognised that adjustments can be on the basis of local changes, it is considered that the Council has not specifically related this to Breckland and the housing market area.

Question 3.5: A further uplift of 8.5% has been added to reflect market signals (to improve affordability). How has this figure been arrived at and is it justified? Is the uplift sufficient to address affordability issues?

2.6. The Planning Practice Guidance advises that the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and the supply of dwellings (Paragraph: 019 Reference ID: 2a-019-20140306).

2.7. Paragraph: 020 (Reference ID: 2a-020-20140306) notes "*In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable.*" The Council has suggested an uplift of 8.5%. This is considered to be too low and is not anticipated to sufficiently address affordability matters within Breckland.

2.8. The Local Plans Expert Group 'Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016) recommends at Appendix 6, in areas of poor affordability, with a house price ratio at 8.7 or more than a 25% uplift should be applied.

2.9. Given the poor affordability in Breckland it is considered that an increased uplift, in the region of 20%, would be more in accordance with the Local Plans Expert Group.

Question 3.6 Is it justified and consistent with the PPG methodology to subtract the uplift from concealed families and homeless households from the market signals uplift?

2.10. No. The Planning Practice Guidance advises that the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and the supply of dwellings (Paragraph: 019 Reference ID: 2a-019-20140306). Overcrowding is discussed within this paragraph with specific reference to concealed households.