

Subject: Great Yarmouth Borough Council Housing Delivery Action Plan 2020

Report to: Housing & Neighbourhoods Committee 1st October

Report by: Strategic Planning Manager

SUBJECT MATTER

The production of the Council's Housing Action Plan for 2020

RECOMMENDATIONS

That Housing and Neighbourhoods Committee:

- 1. Notes that the Council has not met the national Housing Delivery Test for the period 2016/17-2018/19 and so needs to prepare and publish a Housing Action Plan**
- 2. Endorses the update to the Housing Delivery Action Plan as attached to this report.**

1 BACKGROUND

1.1 Increasing the delivery of housing has been a national priority for many decades, with it being commonly accepted that levels of housebuilding have not met needs.

1.2 The Government introduced the Housing Delivery Test (HDT) in the July 2018 version of the NPPF. The HDT requires that delivery of housing must be at least 95% of the authority's housing requirement over the previous three years. If delivery has fallen below 95%, then the authority "should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years". When the first set of national results were published in February 2019, for the years 2015/16-2017/18, Great Yarmouth borough had seen delivery of 67%, meaning that a Housing Action Plan needed to be produced. This was published in August 2019.

1.3 The HDT results for the years 2016/17-2018/19 were published in February 2020. These results showed that whilst delivery had improved, it was still short of the 95% threshold at 77%. Therefore, the requirement for a Housing Action Plan still stands.

1.4 Attached to this report is an update to the Housing Action Plan for 2020. The action plan reviews the progress on actions identified in last year's plan.

1.5 On whole the Council is undertaking a wide range of actions to help improve housing delivery across the Borough. No new, additional actions are identified in this year's plan other than those identified in the Corporate Plan. The Housing Action Plan reports good progress on many of the actions previously identified and delivery is now

increasing in the Borough with 382 completions in 2019/20. This means next year the Council is likely to pass the Housing Delivery Test.

2. FINANCIAL IMPLICATIONS

2.1 None directly, although specific activities proposed may have cost implications. These have/will be subject to separate committee/Council decisions. The actions identified in the Housing Action Plan are not binding on the Council and many of the actions already have the approval of the relevant committee and are currently being implemented. Preparation of the Action Plan itself is within the normal budget for the Planning & Growth Service.

3. LEGAL AND RISK IMPLICATIONS

3.1 None. The action plan is not binding and is not a requirement of legislation. However, it is a requirement of national planning policy. Therefore, it is clearly important to prepare one to demonstrate that the Council is doing all it can to increase the delivery of housing. The plan could be of value in defending planning appeals and supporting the examination of the Council's Local Plan.

4. CONCLUSIONS

4.1 The Council has to prepare a Housing Action Plan due to under-delivery of housing in the past three-year period, even though this under-delivery is not mainly due to any shortcomings of the Council itself. A significant number of mitigation and improvement measures are already in train (and have been for years in some cases) which are now starting to show success.

5. RECOMMENDATIONS

That Housing and Neighbourhoods Committee:

- 1. Notes that the Council has not met the national Housing Delivery Test for the period 2016/17-2018/19 and so needs to prepare and publish a Housing Action Plan**
- 2. Endorses the update to the Housing Action Plan as attached to this report.**

6. ATTACHMENTS

1. Draft Housing Delivery Action Plan 2020.

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated?

Area for consideration	Comment
Monitoring Officer Consultation:	Yes
Section 151 Officer Consultation:	N/A

Existing Council Policies:	Local Plan Core Strategy (2015)
Financial Implications:	Discussed in the report
Legal Implications (including human rights):	None directly
Risk Implications:	Discussed in the report
Equality Issues/EQIA assessment:	None
Crime & Disorder:	None
Every Child Matters:	None

HOUSING DELIVERY ACTION PLAN 2020



GREAT YARMOUTH
BOROUGH COUNCIL

Prepared in response to the
results of the Government's
Housing Delivery Test results –
2019 measurement.

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Introduction

Increasing the delivery of housing has been a national priority for many decades, with it being commonly accepted that levels of housebuilding have not met needs, resulting in a level of social and economic harm.

At least partly as a result of the need to focus on delivery, the Government introduced the Housing Delivery Test (HDT) in the July 2018 version of the NPPF (paragraph 75). In essence, the HDT requires that delivery of housing must be at least 95% of the authority's housing requirement over the previous three years. If delivery has fallen below 95%, then the authority "should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years". When the first set of national results were published in February 2019, for the years 2015/16-2017/18, Great Yarmouth borough had seen delivery of 67%, meaning that a Housing Action Plan needed to be produced. This was published in August 2019.

The HDT results for the years 2016/17-2018/19 were published in February 2020. These results showed that whilst delivery had improved, it was still short of the 95% threshold at 77%. Therefore, the requirement for a Housing Action plan still stands.

This document therefore provides an update to housing action plan and reports on progress made over the last year. This document should be read in conjunction with the 2019 Housing Delivery Action Plan.

Recent Housing Delivery

For the period 2016-2019 the housing target within the Great Yarmouth Core Strategy was less than 5 years old and therefore not 'out-of-date'. In this circumstance the housing need for the purposes of the Housing Delivery Test (HDT) is the annual target in the adopted plan unless the local housing need figure is lower (which in the case of the relevant years above - it is not).

The table below shows delivery compared to housing requirement in the Core Strategy over the relevant 3 years.

	2016/17	2017/18	2018/19	Total
Housing Target	301	301	301	902 (due to rounding)
Housing Delivered	186	207	306	699
Percentage Delivery	62%	69%	102%	77%

As can be seen by the figures above, housing delivery has slowly been increasing and in the most recent year has exceeded requirements.

Delivery has again increased significantly in 2019/20 with **382** completions. As such the Council should be able to demonstrate 99% delivery against the target next year.

Additionally, there are still significant numbers of homes with the benefit of planning permission. As of April 2020 there are 2,990 units with planning permission. Many of these are expected to come forward over the next five years.

Research into Housing Delivery

The research presented in section in section 4 of the 2019 action plan remains largely up to date and relevant. However, there has been some research published which is relevant to housing delivery in Great Yarmouth as detailed below.

Cost and Value – Building Better, Building Beautiful Commission (Knight Frank, Feb2020)

This research report aimed to support the work of the Building Better, Building Beautiful Commission which was set up by the Government in December 2018 to look at improving beauty in the delivery of new homes and neighbourhoods. The aim of the report was whether there is added value where scheme are developed with quality as an aim.

The report included a case study of Great Yarmouth. The report states that the housing crisis discussed nationally does not reflect the crisis in Great Yarmouth, identifying that the town has a demand side issue rather than a supply-side issue.

The report opines that policy making designed to appease the perceived national housing crisis does nothing to stimulate investment into areas like Great Yarmouth. The report includes an analysis of housing commitments, completions and the relevant targets and concluded it doesn't make a difference how many homes have planning permission or what the targets are, the number of homes will reflect demand.

The report also analysed the 2013 Strategic Housing Market Assessment. This concluded that the growth in demand from households likely to need a house (as opposed to a town centre flat) would only be 2.7% between 2013 and 2029.

The report advises that if town centre sites are to be successful it is important that they harness the small amount of demand there is and therefore important this demand is not directed to less sustainable or less regenerative locations.

The report concludes that housing targets are putting pressure on the Council to approve more planning permissions when instead it should be encouraged to refuse application which are not in the most sustainable and most regenerative locations.

Update on Actions to Address Delivery

The following table provides an update on all of the actions, current and planned as identified in the 2019 Housing Action Delivery Plan. The numbers relate to the paragraph numbers in the 2019 action plan for ease of reference.

Action	2020 Update
5.2 Infrastructure improvements. <ul style="list-style-type: none"> • Third Crossing • Flood Defences • A47 improvements. 	<p>The examination into the Development Consent Order for the Third Crossing has now been completed and the Examining Authority has issued a Recommendation Report to the Secretary of State. A decision from the Secretary of State is expected by the 24th September 2020.</p> <p>Work has commenced on the improvements to flood defences.</p>
5.3 Progressing the Local Plan Part 2.	<p>The Local Plan Part 2 has now been submitted for examination (31st July 2020). The Local Plan allocates an additional 1,992 new homes. 1,752 of these homes are on land in the control of a developer. The remainder are on land in control of a landowner who has expressed an intention to release the land for development. The allocations within the plan together with existing commitments will ensure there is an overprovision of housing land against need over the next 10 years of 33%.</p>
5.4 Developers Forum	<p>The Developer's Forum continued to meet until March when it was postponed due to Covid-19. It is expected that the forum will re-convene in the near future, either virtually, or in person if safe to do so.</p>
5.5 Appointment of a Housing Growth Manager	<p>This officer is still in post and working on a number of actions detailed in this table.</p>
5.6 Promoting a Housing Deal for Great Yarmouth	<p>A report by WSP is now nearing completion and the Council is in conversation with Homes England partners. However, there have been delays due to Covid-19.</p>
5.7 Council's Property Acquisition and Disposal Policy	<p>The strategy was adopted in April 2019 and provides clarity on how and when the Council will acquire properties to provide a greater number of better-quality homes in the Borough.</p>
5.8 Middlegate Estate Regeneration	<p>An initial study into the regeneration project was completed in January 2020. Work on the viability of the project was started in July 2020.</p>
5.9 Regeneration of North Quay and The Conge	<p>An outline planning application for the redevelopment of The Conge to provide 89 dwellings was submitted in May 2020.</p> <p>A Supplementary Planning Document was adopted in May 2020 to support the regeneration of the North Quay site. A number of technical studies to inform the regeneration of the site have been completed and negotiations continue with landowners on acquisition by the Council.</p>
5.11 Property Market Study	<p>This report is now complete. The study highlighted issues with demand and perception which undermine delivery of open market homes in the central part of Great Yarmouth.</p>

Action	2020 Update
	The study concluded that housing developments within this central area would be unviable without gap funding and that a targeted raft of regeneration strategies are required to raise values and diversify the housing market offer. The Conge project identified above is a key response to this.
5.12 Improved relationships with Registered Providers	The Council has met with all registered providers at a Director level and the Council is about to commence a procurement exercise to appoint a strategic registered provider partner for future developments.
5.13 Future High Streets Fund	The Council has submitted a £19.9 million bid as part of the Future High Streets Fund (5 th June 2020). The bid includes the 89 homes on The Conge referred to above, together with the conversion of historic properties in the Market Place and King Street and new contemporary houses to the rear of King Street.
5.14 Future Place Status.	Great Yarmouth was a RIBA Future Place in 2019. It was a successful project in raising the profile of the town and RIBA contributed a useful piece of work around future seafront aspirations.
5.15 Strategic planning work across Norfolk.	Work has continued on revising the Norfolk Strategic Planning Framework. Work has also been undertaken looking at the needs for housing for older and vulnerable people which is expected to complete this autumn. The Council is also looking to jointly commission an update to the Strategic Housing Market Assessment with other Norfolk local authorities. It is expected that this project will be commissioned in early autumn.
5.17 Enterprise Zones	Work is continuing to promote the Enterprise Zones and the Council is actively working on proposals for commercial developments in the zones. The positive impacts from this work to strengthen the local economy should have a positive effect on the local housing market.
5.18 Equinox Enterprises Ltd. (the Council's wholly-owned, arm's length property company)	As of April 2020, 14 dwellings were completed on Equinox's development site at Beacon Park. There remain 42 dwellings outstanding on the detailed planning permission which are expected to be delivered over the next 2 years.
5.19 Pre-application charging	This was introduced in October 2018. Take-up of this service continues to popular with a number of major developments taking advantage of the service.
5.20 Promotion of the town and borough to potential investors and developers	The Council is continuing to promote the town and borough to investors with attendance at MIPIM and REVO.
6.4 Greater analysis of why sites are not coming forward.	The Council contacted all landowners/developers with planning permission in Autumn 2019 to help inform the Five Year Supply of Housing Statement. The survey asked questions about delivery plans for specific sites, whether there were any delays and blockages affecting delivery and whether the Council could do anything to help speed up delivery. Despite creating an easy to use form, and sending chasing emails and calls, the response was not brilliant with

Action	2020 Update
	<p>just 6 responses. Responses which were received did not identify any major issues. In terms of blockages and delays to delivery, issues reported included surface water drainage issues and lack of demand (in Hemsby). In terms of what the Council can do to help delivery it was requested that:</p> <ul style="list-style-type: none"> • planning applications are dealt with quickly; • the process should be streamlined as much as possible at each stage; • Planning conditions discharged promptly <p>Further analysis as part of putting the Five Year Supply together revealed that good progress towards reserved matters was being made on a number of outline consents and that many sites now had developers involved. As a result the five year supply position increased from 2.55 years to 3.42 years.</p> <p>To support this year's Five Year Supply Statement, the Council will re-consider on how it engages with landowners and developers to obtain a better response.</p>
6.6 Setting up a small site sub-group of the Developer Forum	No progress has been made on this and the Developer Forum meetings were postponed in March due to Covid-19. This will be explored further when the Developer Forum reconvenes.
6.8 Other Internal Measures – for example prioritisation of discharge of condition applications, and use of planning performance agreements.	A focus has been made over 2019/20 on enhancing the capacity of the planning service to be able to respond more quickly. An additional Senior Planner post has been created and a Development Management Manager post which should provide a significant contribution to the quality and speed of the planning service. A Business Support Manager role has also been created to ensure planning applications, building control applications and land charges enquiries are processed as quickly and accurately as possible. The Council will also be reviewing its software to ensure a better and more efficient service. Figure A7 in Appendix A shows that performance in determining applications within the set timescales or within agreed extensions has improved over the last five years.
6.99 External measure and “asks” to potentially be considered.	<p>The Cost and Value – Building Better, Building Beautiful Commission report referred to above, highlights at a national level and to Government some of the constraints to housing delivery in Great Yarmouth. A planning white paper has recently been published for consultation which will give the Council a further opportunity to raise concerns about housing delivery in the Borough.</p> <p>The town was selected as one of 101 places across the country to potentially benefit from the new Town Deals Fund. A Town Deal Board, of local leaders from the private, public and third sectors, has been set up and is crafting a Town Investment Plan to support the bid which could be up to £25 million of funding.</p>

Corporate Plan Actions for 2020

Since the 2019 Housing Delivery Action Plan the Council has published a revised Corporate Plan [“The Plan 2020-2025”](#). The plan includes a number of strategic priorities and outcomes the Council wishes to achieve over the five-year period. Many of these will help support the housing market. However, there are a number of specific outcomes and priorities for housing which are listed below. Some of these priorities are already covered above, but inclusion in the Council’s Corporate Plan further emphasises their importance:

Outcomes

- To have delivered more new homes of mixed tenure including meeting specific needs, such as for older and disabled people;

Strategic Priorities

- Increase the number of good quality new homes and associated infrastructure built through both direct provision and by working with Registered Social Landlords and private sector developers.
- Better quality private rental accommodation will be available for residents by tackling substandard provision and ensuring the rollout of the selective licensing scheme
- Providing decent homes to our existing tenants through a planned programme of improvement works and providing a responsive and quality repair service.
- To understand the issues facing our largest housing estates and where appropriate bring forward regeneration plans.
- Bring empty properties back into use and in the town centre bring the first and second floors of appropriate properties back into residential use, creating quality homes.
- To support residents to live in high quality and warm homes.
- Shape our town centres to make them places where people will choose to visit, shop, socialise and live.
- Continue to assemble land along North Quay for regeneration purposes to deliver an improved gateway to the town through appropriate redevelopment.
- To transform The Conge as the key linkage between the railway station and town centre by delivering a mix of new residential and employment opportunities as well as improving the physical environment.
- Convert a greater numbers of planning permissions into developed out sites.

Alongside the Corporate Plan the Council has also published an Annual Action Plan for 2020-21. This plan also takes into account the Covid-19 crisis and sets a basis of a plan for recovery. The plan includes a number of specific actions which relate to the priorities and outcomes of the Corporate Plan. Those actions relevant to housing delivery include:

- Progress the Marketplace redevelopment through the planning phases and develop a business case for submission to the Future High Street fund to obtain funding for further to complete further interventions and improve the Town Centre area.



- Work with Town Deal Board partners to develop an evidence-based Town Investment Plan with a clear programme of interventions. Submit bid to Central Government to obtain for a share of the Towns Fund.
- Continue engagement activities with property owners in North Quay in order to progress general land assembly in readiness for regeneration.
- Submit planning applications for the construction of residential properties at the Conge.
- Continue to work existing occupiers in the Conge to find suitable premises to enable them to relocate.
- Progress the adoption of the Local Plan Part 2 to enable land allocation for new developments.
- Continue to hold regular Developers forums to identify and discuss and planning or development issues and remove barriers.
- Increase the number of new homes completed across the Borough to meet a range of needs including affordable homes and homes which meet specific needs by:
 - Expanding the stock of council housing via acquisitions and new build properties
 - Joint working with Registered Providers to deliver quality homes.
 - Support private sector developers to build out quality new homes.
- Commence development of a Design Code to ensure both the council's aspirations for a quality built environment and exemplar housing can be delivered.
- Undertake an audit of planning permissions not built out and land allocations for strategic delivery
- Address issues of poor quality properties through a targeted programme of acquisition and renovation to provide high quality homes.
- Continue the work of Equinox Enterprises Limited in housing development
- Further engagement with private rental sector to:
 - Review outcomes of selective licensing scheme with a view to expanding the scheme.
 - Encourage empty homes back into use.
 - Instigate enforcement action on sub-standard HMO's
- Use Equinox Property Holdings Limited to build a portfolio of quality market rent properties in the borough.
- Complete viability work & business case on the regeneration of Middlegate Estate.
- Adopt a cohesive approach to reviewing empty properties and encouraging owners to bring them back into use.

Conclusions

It is clear that housing delivery is picking up in the Borough and there is a likelihood that more planning permissions will deliver homes over the next five-year period. The good progress made on the Local Plan Part 2 will further ensure that land availability is not a constraint to housing delivery. It is likely that the Council will not be required to prepare an action plan next year in light of the improving delivery.

The Council is making good progress on a wide range of actions to help stimulate the housing market and increase delivery.

Since the publication of last year's action plan, there has been the outbreak of Covid-19. The full economic effects on the housing market from the Covid-19 pandemic are still not clear. At present

there is no evidence to suggest there has been a downturn in the housing market or delivery locally, although a number of building sites did close temporarily at the start of the outbreak. At the time of writing, the number of planning applications that the Council is receiving has not notably decreased compared with previous years and business in the Council's Building Control section is picking up again with nearly 100 dwellings issued completion notices between 1st April 2020 and 31st July 2020. The plans the Council have put in place to help support the recovery and the actions detailed above should help ensure any impacts from Covid-19 on housing delivery are mitigated. Additionally, the Government has introduced a raft of measures to support the housing market and increase the delivery of homes including:

- Extending planning permissions due to lapse between 23 March and 31 December 2020
- Fast-track deemed consent route to vary conditions on construction site working hours
- New permitted development rights to create new homes through extending upwards and redevelopment of some commercial properties to housing (through demolition and re-build)

However, despite these actions the impact of Covid-19 will be an issue that the Council will need to closely monitor, analyse and respond to as appropriate.

Appendix A - Analysis of Housing Data for 2020

Housing Data up to 2019/20

Housing Completions & Housing Commitments (2001/2-2018/19)

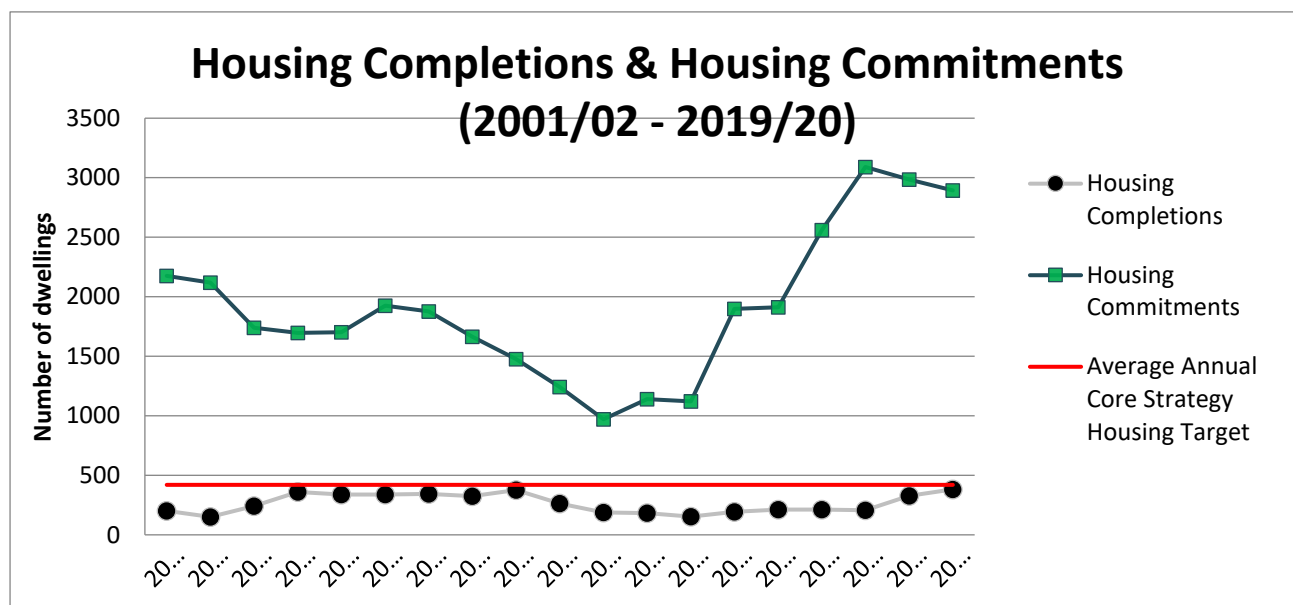


Figure A.1 (housing completions vs commitments)

Figure A.1 shows that the significant increase in commitments (housing planning permissions) starting in 2014/15. The two most recent years completions show an sustained increase in housing completions compared to the under delivery compared to the Core Strategy Target following its adoption in 2015.

Housing Completions 2019/20

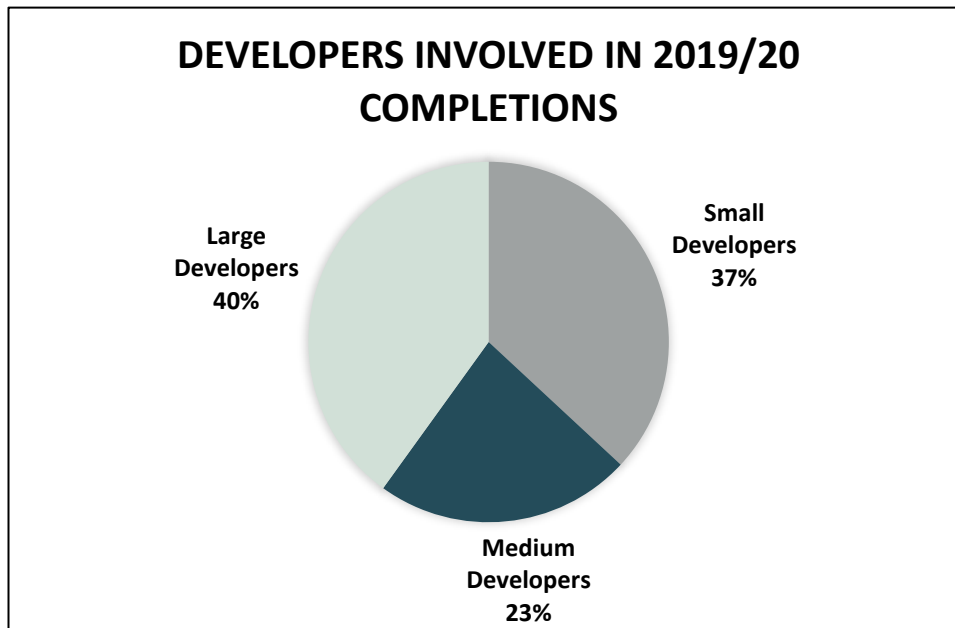


Figure A2 (Breakdown of types of developers involved in 2019/20 completions)

The pie chart above shows how little of the total completions were delivered by small developers. Following 2018/19 there has been an increase in the proportion being delivered by medium developers.

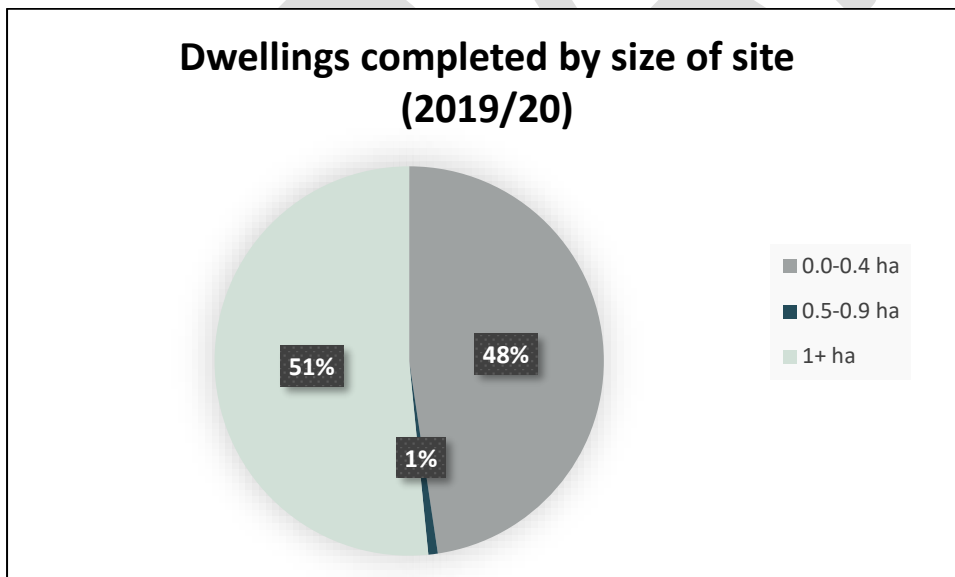


Figure A3 (Dwelling completions by size of land in hectares (2019/20))

Figure A.3 shows that completions for 2018/19 were split evenly between small sites (up to 0.4 hectares) and larger sites (on one hectare or more) with only a small proportion delivered on medium sites (0.5 to 0.9ha).

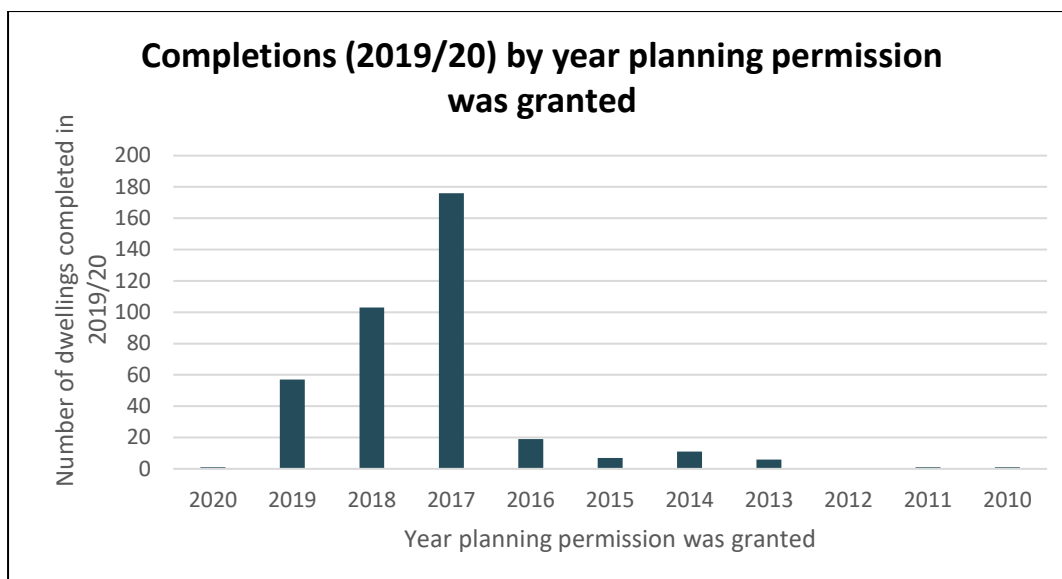


Figure A4 (Completions by year planning permission was granted (2019/20))

The figures above show that, for 2019/20 completions, most of the completions arise from consents granted in the previous three or so years. To some degree this will be an accident of timing, with some larger sites delivering for some years after consent was granted, but it does show how little housing tends to be delivered from consents which have been implemented for some years.

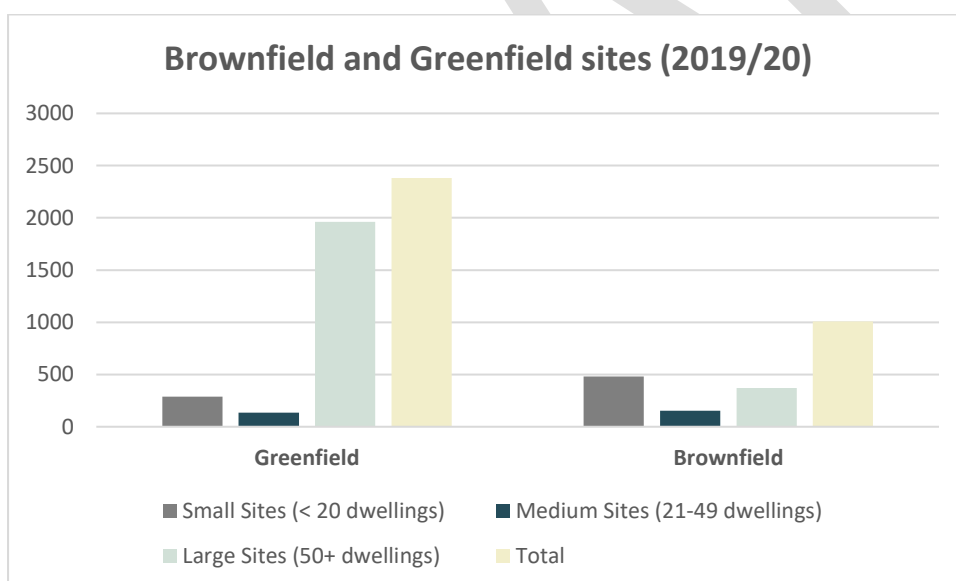


Figure A5 (Brownfield and Greenfield Sites)

Just over two thirds of current consents/commitments are on greenfield sites. Brownfield commitments total more than 1,000 units, albeit there are often constraints and viability challenges preventing brownfield sites coming forward as swiftly as greenfield sites.

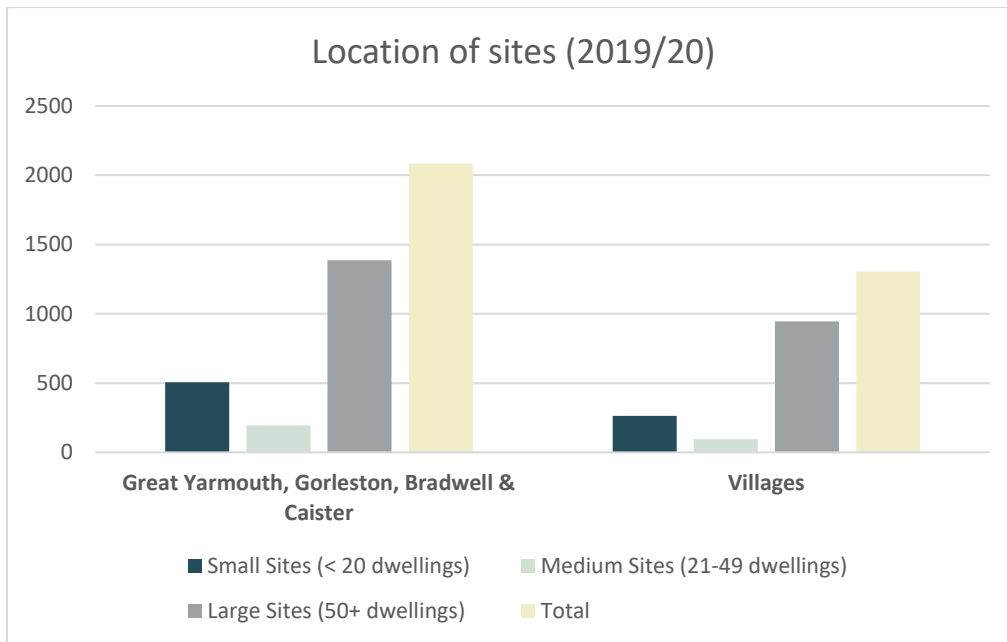


Figure A6 (Location of Sites)

Figure A6 shows that the bulk of the current consents/commitments are within the two main towns of Great Yarmouth, Gorleston, and Key Service centres of Bradwell and Caister.

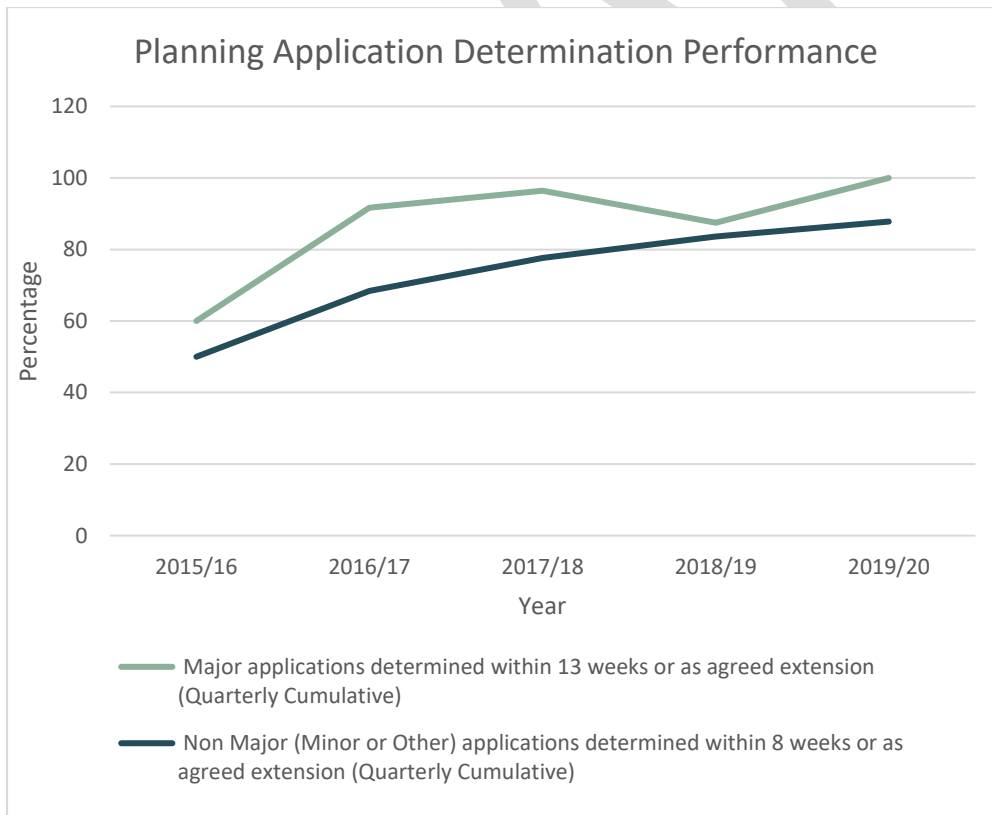


Figure A7 (Planning Application Determination Performance)

Figure A7 shows that over the last five years an increasing proportion of planning applications have been determined within the set timescales or within an agreed extension. Performance for the most recent three years is above the target of 75% of decisions.

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