

**Greater Norwich Local Plan
Pre-Submission Draft Strategy – Regulation 19 Publication Strategy
Representations on behalf of Orbit Homes**

Policy 5 – Homes

Policy 5 outlines the proposed requirements for affordable housing provision, space standards, accessible and specialist housing and self/custom-build housing. Our representations on behalf of Orbit Homes focus on the requirements for 10% of affordable homes to be affordable homes ownership, Nationally Described Space Standards and self/custom-build housing.

Affordable Home Ownership

Policy 5 requires:

"10% of the affordable homes being available for affordable home ownership where this meets local needs"

This requirement does not accord with national policy at NPPF paragraph 64 which requires 10% of all the homes on major developments to be for affordable home ownership, not just 10% of the affordable housing contribution. At 33% affordable housing provision this would equal 30% of the of the tenure split and not 10%. NPPF Paragraph 64 provides two possible exceptions to setting this policy requirement:

- *"unless this would exceed the level of affordable housing required in the area, ..."* – This clearly wouldn't apply in Greater Norwich;
- *"... or significantly prejudice the ability to meet the identified affordable housing needs of specific groups"* – There is clearly a critical need for affordable rented housing in Great Norwich and there may be an argument to provide a lower proportion of affordable home ownership on this basis, but the Greater Norwich authorities would need to provide a detailed evidence to justify this.

NPPF paragraph 64 also includes exemptions from this 10% rule for specific sites/developments for Build to Rent homes, specialist accommodation, self/custom-build homes and 100% affordable housing developments. These are important exemptions and should be included in Policy 5.

Recommendation: The policy does not accord with national policy and should be amended as follows to ensure it is sound:

"10% of all homes being available for affordable home ownership in accordance with NPPF paragraph 64, unless one of the exceptions to this rule contained in the NPPF is met."

Nationally Described Space Standards (NDSS)

The policy requires all dwellings to meet the nationally described space standards. Orbit Homes recognises the good intention behind this policy, but is very concerned about its impact on the viability of affordable housing developments. As a Registered Social Landlord (RSL), Orbit Homes has access to Homes England grants to fund the delivery of affordable housing, but these grants are based on a maximum floorspace per size of dwelling (i.e. number of bedrooms) that is approximately 85% of that required to meet the nationally described space standards. Policy 5, as currently worded, would therefore have a significant negative impact on Orbit Homes' and other RSL's ability to deliver affordable housing in the area as their funding would not cover the costs of building the larger dwellings.

Recommendation: This policy would serve to restrict the delivery of affordable housing and is therefore not effective or sound. In order to resolve this issue, we recommend that the policy is amended to allow flexibility where the grants available for affordable housing delivery would fail to fully fund the costs of delivering larger dwellings.

Self/Custom-Build Housing

Orbit Homes does not object to setting a percentage requirement for self/custom-build dwellings in principle, but consider that any requirement set needs to be sufficiently evidence based. The Councils' self-build registers should provide a broadly accurate indication of demand for self-build plots (although there may be some duplication with people registering in more than one authority) and also of the type of plots in demand. This data should be used to inform the policy. GNLP paragraph 282 notes that in 2018/19 there were 113 people on the self-build register for the Greater Norwich Area. It is not known if this figure has since dramatically increased, but if it remains at broadly the same level then the policy to require 5% of plots on sites of 40 or more dwellings is clearly excessive and not justified based on the available evidence. We are also aware from other LPA's self-build registers that the actual demand for self-build plots has been for individual plots in rural locations, as opposed to plots on suburban housing estates.

Recommendation: We recommend that the percentage requirement and site size trigger for delivering self-build housing are reviewed to ensure the policy is designed to meet actual needs.