

# Planning Committee

04 April 2025

Agenda item number 12

## Local Plan- Preparing the Publication Version

Report by Planning Policy Officer

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### Summary

This report introduces some updated evidence that will support the next version of the Local Plan: Housing Needs Assessment addendum and Affordable Housing Topic Paper. There are also two amended policies: safety by the water and, rural enterprise dwellings.

### Recommendation

To endorse:

- i. the Housing Needs Assessment addendum as evidence to support the Local Plan and
  - ii. the “safety by the water” and “rural enterprise dwellings” policies for inclusion in the Local Plan.
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## 1. Introduction

- 1.1. This report introduces some updated evidence that will support the next version of the Local Plan: Housing and Economic Land Availability Assessment part 2 (HELAA) and From HELAA to Local Plan part 2. There are also two amended policies: safety by the water and rural enterprise dwellings.

## 2. Safety by the water policy

- 2.1. The new NPPF has introduced a requirement to consider developments near to open water. Paragraph 102b says: The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development. A draft policy that seeks to address this requirement is included at [Appendix 1](#).

## 3. Rural enterprise dwellings

- 3.1. It is proposed to amend the current draft policy, that sets out requirements for any proposals for rural enterprise dwellings, to require temporary accommodation (such as caravans) first rather than a dwelling straight away (amended policy in [Appendix 2](#)).

## 4. Local Housing Needs Assessment - addendum

- 4.1. Members will recall that around Autumn 2022, a Housing Needs Assessment was completed for the Local Plan for the Broads. This original Assessment used population projection data to inform its findings. The December 2024 NPPF and updated NPPG now point to the use of housing stock data. We commissioned an addendum to the original Assessment which is included at [Appendix 3](#). The change to the methodology means that our housing need has tripled. It should be noted that our need is part of the need for the six constituent districts and not additional to that need.

## 5. Affordable Housing Topic Paper

- 5.1. Members will recall that we are proposing a commuted sum (off-site contribution) towards the provision of affordable housing from development as follows:
- i. Brownfield schemes located on the waterfront: 3-9 dwellings
  - ii. Other brownfield schemes: 5-9 dwellings
  - iii. Greenfield schemes: 3-9 dwellings.
- 5.2. The Affordable Housing Topic Paper ([Appendix 4](#)) has been produced to justify that approach.

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Date of report: 10 March 2025

Appendix 1 – [Safety by the water policy](#)

Appendix 2 – [Rural enterprise dwellings policy](#)

Appendix 3 – [Local Housing Needs Assessment Update 2025](#)

Appendix 4 – [Affordable Housing Topic Paper](#)

## Appendix 1 – Safety by the water policy

### **Policy PUBDMxx: Safety by the water**

1. Proposals that increase the number of people accessing the water or facilitate the enjoyment of land adjacent to the water or increase the difficulty of getting out of the water must address water safety.
2. For such developments, a Water Safety Plan must be produced by a suitably qualified consultant, experienced in producing and helping to deliver water safety measures. The Water Safety Plan must consider and address the following:
  - a) What are the risks of someone falling into the water, and who is likely to be exposed to the risk as a direct result of the proposed development?
  - b) How is this risk to be minimised?
  - c) What is the water depth and speed of flow?
  - d) What design and safety features will be incorporated into the development to ensure that anyone in the water can get out safely? Consideration must be given to the landscape impact and the impact on any Heritage Asset of any water safety feature to be used.
  - e) How will the safety features be maintained?

### **Reasoned Justification**

Being a primarily water-based area that people enjoy for recreation, safety in the Broads is an important issue. Sadly on occasion people die in the water, and many more fall in. On a hot day, the cool water may attract those wanting a quick swim, and the hazards are not always recognised or considered. The area is also popular for organised wild and open water swimming groups, and people sail on the Broads using stand-up paddle boards, canoes, sailing boats and motorised cruisers. Others enjoy walking beside the waterways and visiting the nearby open spaces, pubs and cafes, and there are many other waterside buildings including boatyards and homes.

Easily accessible safety equipment like lifebuoys, throw lines and ladders are essential in helping someone in trouble get out of the water. There were 236 drownings and water-related deaths from accidents or natural causes across the UK in 2023. As in previous years, more than half of the deaths (140) were in inland waters such as tidal and freshwater rivers, lakes and reservoirs. In the Broads, over the last 15 years there have been on average 5 deaths per year; 34 related to boating and 43 non-boating related. It should be noted that some of these deaths were not accidental, and this policy seeks to influence accidental water related incidents. There are also near drownings or people falling in (without intending to) – the incidences of near drownings or people falling in are often not reported.

The National Water Safety Forum has produced the UK Drowning Prevention Strategy<sup>1</sup> which aims to reduce accidental drowning fatalities in the UK by 50% by 2026, and reduce risk amongst the highest risk populations, groups and communities. A target of the Strategy that is particularly relevant to this policy is to increase awareness of everyday risks in, on and around the water. The strategy asks communities to develop a risk assessment for the area and to put in place Water Safety Plans at a community level. The NPPF 2024 (at paragraph 102) says ‘the safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development’.

### **Policy implementation**

While this policy refers to proposals that increase the number of people accessing or being by the water and those that make it harder for people to get out of the water, there may be other development where it is appropriate to consider safety by the water.

Relevant applications need to assess, address and then implement appropriate safety by the water features. Applicants need to engage the assistance of a suitable qualified organisation to do this. The measures, assessment etc need to be proportionate to the scheme and any risk identified.

Applicants will be required to consider the risks of people falling into the water and put in place means to help people while in the water and a safe way for them to get out. The safety of those involved in the construction of the scheme should also be an important consideration for the Water Safety Plan.

For development near to Heritage Assets or in Conservation Areas, measures such as bright plastic covers on life rings may detract from the scenery or setting. Less visually intrusive, but equally effective forms of safety equipment can be provided in such locations.

There are many guides in place that may be of relevance. These include:

- [Managing safety at inland waters - RoSPA](#)
- [PRE decision tree | National Water Safety Forum](#)
- [Inland and Coastal Water - Essential Water Safety Guidance | Royal Life Saving Society UK \( RLSS UK \)](#)
- The Broads Authority’s Mooring Design Guide has some practical considerations that may be relevant to schemes: [Practical considerations](#).

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<sup>1</sup> Drowning Prevention Strategy: <https://www.nationalwatersafety.org.uk/media/1005/uk-drowning-prevention-strategy.pdf>

## **SA Objectives:**

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.

- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

**SA Assessment**

	A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With much of the Broads being open water or near to open water, it seems prudent to have a policy.</p>			
ENV2				
ENV3				
ENV4		?	+ Policy refers to impact of proposals on the character of the area.	+ Policy refers to impact of proposals on the character of the area.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9			+ Policy refers to impact of proposals on the character of the area.	+ Policy refers to impact of proposals on the character of the area.
ENV10				
ENV11				
ENV12				
SOC1		?	+ Water safety measures will help people who are in the water to get out.	+ Water safety measures will help people who are in the water to get out.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3	?	+ People use the water and are near to water for work or enjoyment and the policy seeks to ensure their safety.	+ People use the water and are near to water for work or enjoyment and the policy seeks to ensure their safety.	

## Appendix 2 – Rural enterprise dwellings policy

### **Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers**

1. Development of a new dwelling or a residential mooring for rural enterprise workers will only be permitted outside the defined development boundaries (or other locational criteria if for a residential mooring) if:
  - a) For the first 3 years the accommodation has been provided by a caravan or other temporary accommodation/residential mooring (see section xxx of this policy relating to temporary accommodation).
  - b) Satisfactory evidence is submitted that demonstrates an existing essential need for full-time worker(s) to be available on site or nearby at all times for the enterprise to function properly;
  - c) The need is arising from a worker employed either full-time or primarily in the Broads in a rural enterprise;
  - d) Evidence is submitted that demonstrates that the business has been established for at least three years, has been profitable for at least one of them, is currently financially sound and has a clear prospect of remaining so;
  - e) The functional need cannot be met by an existing dwelling on the site or nearby, and there has been no sale on the open market of another dwelling on the site that could have met the needs of the worker in the past three years;
  - f) Where appropriate, consideration has first been given to the conversion of an existing building;
  - g) The dwelling is commensurate in size and scale with the needs of the enterprise and the cost would be viable in relation to the finances of the enterprise;
  - h) The dwelling is sited to meet the identified functional need and is well related to any existing buildings of the enterprise;
  - i) The proposal would not adversely affect the historic environment, landscape character or protected species or habitats (see section on HRA); and
  - j) The scheme provides biodiversity net gain (in line with national policy and [PUBDM16](#)).

### **Temporary accommodation (for example caravan, residential mooring)**

2. Such temporary accommodation will be supported only where:
  - a) residential occupation would be for a period of up to three years;
  - b) the proposal satisfies criteria b) and c), e) and g) to j) in part 1 of this policy;
  - c) the application is supported by clear evidence of a firm intention and ability to develop the enterprise concerned (for example significant investment in building(s) on site); and
  - d) the application is supported by clear evidence that the proposed enterprise has been planned on a sound financial basis and has a good prospect of becoming a viable long-term business.

- e) In relation to temporary caravans and mobile homes, the proposed temporary dwelling would not be located in Flood Risk Zone 3; and
  - f) The temporary structure can be easily dismantled or taken away.
3. Any planning permission granted will specify the period for which the temporary permission is granted, and the date by which the temporary dwelling/mooring will have to be removed. If there is no planning justification for a permanent dwelling, then the mobile home or caravan must be removed or, for a residential mooring, the vessel's residential use must cease. Successive extensions to a temporary permission will rarely be justifiable unless material considerations indicate otherwise<sup>2</sup>.

#### **Occupancy condition**

4. Should a new permanent or temporary dwelling/caravan or other temporary accommodation/residential mooring be permitted under this policy, the Authority will impose a condition restricting its occupation to a person (and their immediate family) solely or mainly employed in agriculture, forestry or a Broads related rural enterprise, as appropriate.

#### **Removal of occupancy condition**

5. The removal of an occupancy condition will only be permitted in exceptional circumstances where it can be demonstrated that:
- a) There is no longer a long-term need for the dwelling on the particular enterprise on which the dwelling is located; and
  - b) Unsuccessful attempts have been made to sell or rent the dwelling at a price that takes account of the occupancy condition.

#### **Design**

6. Proposals shall be of a layout, form and design which strengthens the rural character and its location in a National Park equivalent area, and which reinforce local distinctiveness and landscape character and take into consideration the setting and significance of nearby listed buildings and is in conformity with the Broads Authority Design Guide/code SPD<sup>3</sup> (or successor document).

#### **Habitats Regulations Assessment and biodiversity net gain**

7. Proposals may need a project level Habitats Regulation Assessment and depending on the location, may need to mitigate recreation impacts (through the Norfolk or Suffolk Coast GI

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<sup>2</sup> The NPPG ([Use of planning conditions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/use-of-planning-conditions)) says 'It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities). Further permissions can normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning permission will then be granted permanently'.

<sup>3</sup> The Design Guide SPD is being finalised at the time of writing.



RAMS tariff or equivalent mitigation) and may need to mitigate the impact of nutrient enrichment.

### **Reasoned Justification**

The erection of dwellings outside defined development boundaries has the potential to have a negative impact on the openness and special character of the Broads. Rural enterprise dwellings outside development boundaries will require special justification for planning permission to be granted. The NPPF states one such example as accommodation required to enable agricultural, forestry and certain other full-time rural workers to live at or nearby their place of work.

#### **Delivery and implementation of the policy**

For the purposes of this policy, the term 'rural enterprise workers' relates to those who work in agriculture, horticulture, forestry, tourism and boatyards and other enterprises that require a rural location. Any application would need to fully justify why it considers the dwellings to be linked to a rural enterprise.

Proposals that support the proper functioning of rural enterprises will be supported where there is a demonstrable need for a full-time worker to live at or very close to the site of their work, and this functional need cannot be met by an existing dwelling on the site or in the locality. This is because of the contribution such enterprises make to the local economy. As well as considering the issue of dwellings isolated from services and facilities, rural enterprise worker dwellings will only be permitted where the landscape character of the Broads is protected.

When assessing locality, the Authority will consider the requirement of the business for an employee to live nearby, and a reasonable distance to travel to the business. This will vary on a case-by-case basis, and an application should explain what distance is appropriate and why.

To make sure the demand for a dwelling is likely to be sustained, applications must be accompanied by evidence to demonstrate that the business has been established for at least three years, profitable for at least one of them, currently financially sound and with a clear prospect of remaining so. A business plan for the subsequent three years will assist in assessing the future prospects.

When a new dwelling is proposed, this shall be first through a temporary accommodation. Temporary accommodation could include residential mooring or a caravan. The policy includes specific issues that need to be addressed for any temporary accommodation used to provide a rural enterprise dwelling.

It may be that an enterprise is not able to demonstrate long term financial viability at the point of an application. As such, there could be the opportunity to provide a rural enterprise dwelling on a temporary nature, in line with the requirements of the policy that relate to temporary accommodation.

Proposals to convert buildings to a rural enterprise dwelling (criterion e) will be considered against the conversion policies in the Local Plan. When looking at dwellings that already exist nearby (criterion d), properties available for rent need to be considered as well as those available to buy, and it should be demonstrated what price the enterprise can reasonably afford. Properties that are outside of the Broads Authority Executive Area (but nearby) will also need to be considered.

Any new dwelling permitted under this policy will be restricted in size and scale to one which is commensurate with the needs of the enterprise, so that the proposal does not have an unacceptable impact on the special landscape character of the Broads. The cost of constructing the dwelling in relation to what can be afforded by the enterprise is an important consideration, as the erection of a dwelling should not affect the finances such that the enterprise would no longer be financially viable. Permitted development rights for future extensions and alterations may be removed to maintain control over the size of the dwelling, and in the interests of protecting the landscape and local character.

If a proposal is considered in the context of this policy to potentially have an effect on a habitat site, it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken. The policy raises recreation impacts and nutrient enrichment as two issues which may need mitigation, depending on the location. For both nutrient enrichment and recreation impact, given the small-scale nature of rural enterprise dwellings, this may be mitigated through the RAMS payments that are in place as well as through nutrient neutrality mitigation schemes.

Applicants should be aware that the Authority will use appropriate external expertise when necessary to assess the more technical information needed to accompany proposals. The independent review shall be carried out entirely at the applicant's expense - the applicant will need to meet the cost of this.

Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person, or persons currently or last employed working in local agriculture, horticulture, forestry and other rural activities, or their surviving partner or dependant(s).

Because of changing farm practices, the vulnerability of the agricultural sector and potential decline in other rural businesses, there may be instances where a dwelling or mooring for a rural worker is no longer needed. The Authority will only consider favourably applications to

remove occupancy conditions where it can be demonstrated that there is no longer a need for the dwelling on the particular enterprise on which the dwelling is located, either due to changes in the nature of the business or because the business is no longer viable. Applications for the removal of occupancy conditions will also need to be accompanied by robust information to demonstrate that unsuccessful attempts have been made, for a continuous period of at least 12 months, to sell or rent the dwelling at a reasonable price. This should take account of the occupancy condition, including offering it to a minimum of three local Registered Social Landlords operating locally on terms which would prioritise its occupation by a rural worker as an affordable dwelling, and that option has been refused. With regard to criterion [j5b](#)), unless there are special circumstances to justify restricting the dwelling to the particular enterprise where the dwelling is located, an occupancy condition is likely to allow occupation by other workers in the locality. In this case it should be considered whether there is other demand locally, not just whether the demand for this particular enterprise has ceased.

Proposals for a temporary mobile home or residential mooring for rural workers will only be permitted for a period of up to three years. To protect the landscape character of the Broads, a planning condition will be attached to any permission to ensure that any mobile home or vessel is removed at the end of this three-year period.

The NPPG categorises caravans and mobile homes intended for permanent residential use as ‘highly vulnerable’ development. As per national policy, any development in Flood Zone 3 is not permitted. Development in Flood Zone 2 is only allowed when both the Sequential Test and the Exception Test have been successfully passed. As stated in Footnote 63 of the National Planning Policy Framework (NPPF), a site-specific Flood Risk Assessment is required in Flood Zone 2 and Flood Zone 1 in specific cases. See related policy, [PUBDM8](#) (development and flood risk).

The policy highlights the need for the scheme to ensure Biodiversity Net Gain in line with national policy and policy [PUBDM16](#). The design of the development shall meet the requirements of the Broads Authority Design Guide/code SPD and design policy [PUBDM52](#).



# The Broads Authority:

# Local Housing Needs Assessment Update 2025

Report of Findings

March 2025



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# Executive Summary

## Summary of Key Findings and Conclusions

### Introduction

1. Opinion Research Services (ORS) was commissioned in 2022 by Great Yarmouth Borough Council and the Broads Authority to prepare a Local Housing Needs Assessment (LHNA) for the period 2021-2041 to identify the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing.
2. The previous Government's policy approach to planning for housing need in National Parks and associated areas such as the Broads Authority was different to that of other Local Planning Authorities. Planning Practice Guidance (PPG) on Housing and Economic Needs at paragraph 14 stated that an area such as the Broads Authority could identify its own housing needs based upon local evidence, rather than follow the national standard method for Local Housing Need set out for local authority areas.
3. The current Government published an updated version of the NPPF in December 2024. PPG continues to state that an area such as the Broads Authority is not covered by the standard method for local housing need and that they can consider using a local determined housing need figure. However, it now suggests that the Broads Authority may wish to consider an overall needs figure based upon the current size of its dwelling stock and the median workplace affordability ratio for the local authorities which it covers.
4. Applying this figure as an adjustment factor yields an overall housing need of 51.3 dwellings per annum. Therefore, for this study, we have used an overall housing need for the Broads Authority of 51.3 dwellings per annum for the period 2021-2042. This gives a total dwelling need of 1,077 dwellings over the 21-year period.

### Establishing Current Unmet Need for Affordable Housing

5. To assess the current need for affordable housing, we initially calculated the number of households in the Broads Authority who are not suitably housed and who are unable to afford market housing. These include; all households that are currently homeless, those who currently housed in temporary accommodation, concealed families living as part of another household, households overcrowded in social or private rent, and people otherwise not counted who are in a reasonable preference category on the housing register.
6. The Broads Authority is not a housing authority, so does not collect information on current housing needs. Therefore, we have apportioned need from the 6 local authorities who include part of the Broads Authority. This shows 62 households currently unsuitably housed and needing to move, with a net need for 40 households.

## Future Need for Affordable Housing

7. In addition to those who cannot currently afford market housing, it is also necessary to consider those households who will arise in the future; and households that can afford market rents but aspire to home ownership. The following tables (Figure 1) summarises the overall impact for those who cannot afford market rents of:
- » New households adding to housing need,
  - » The households no longer present reducing housing need and
  - » The changes in circumstances impacting existing households.

**Figure 1: Summary annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model  
Note: Figures may not sum due to rounding)**

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs
All new households	480	372	107
All households no longer present	436	349	88
Change in existing households	-	9	-9
<b>Future affordable housing need 2021-42 (Annual average)</b>	<b>43</b>	<b>32</b>	<b>11</b>

8. Overall reviewing the contribution of each element amounts to an additional 11 households needing affordable housing in the Broads Authority annually over the 21-year period 2021-42.

## Needs of Households Aspiring to Home ownership

9. Based on an analysis of English Housing Survey and local level household data, we can estimate that there is a total of around 240 households currently resident in the Broads Authority who cannot afford to own their own home but would aspire to do so. In addition to the current need, it is also important to consider new households that are projected to form over the period 2021-2042. Through combining this data with the aspiration data from the EHS, we can conclude that it is likely that there would be a further 161 households that form over the 21-year period who will be able to afford to pay market rent but unable to afford to own, despite that being their aspiration.
10. The below Figure 2 bring together the information on assessing the unmet need for affordable housing in 2021 together with the future need for affordable housing and those aspiring to home ownership arising over the 21-year period 2021-42. It can be noted that this assessment has no regard for whether those aspiring can access affordable home ownership options.

**Figure 2: Total need for affordable housing 2021-2042 – The Broads Authority (Source: ORS Housing Model)**

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Overall Affordable Housing Need
Current housing need in 2021	40	240	280
Future housing need 2021-42	221	161	382
<b>TOTAL HOUSING NEED</b>	<b>261</b>	<b>401</b>	<b>662</b>



11. Neither the NPPF or PPG identify that any affordability criteria should be applied to those households who aspire to home ownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford affordable home ownership products.
12. Given this context, we assessed affordability for households that both have sufficient income and savings to purchase an open market property but nonetheless choose to rent, those households with income that would be insufficient to afford 70% of newbuild prices at the lower quartile for the local area, and those households with savings of less than £5,000. After all these households have been discounted from the 401 previously identified there are only 59 households in the Broads Authority who:
  - » Aspire to home ownership but cannot afford to purchase on the open market;
  - » Have incomes sufficient to afford a property at 70% of market value;
  - » Have at least £5,000 in savings.
13. Figure 3 provide a breakdown of the total affordable housing on this basis.

**Figure 3: Overall need for Affordable Housing 2021-42 in The Broads Authority, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Affordable Housing (Households)
1 bedroom	18	7	25
2 bedrooms	109	20	129
3 bedrooms	117	26	143
4+ bedrooms	18	7	25
<b>TOTAL HOUSING NEED</b>	<b>261</b>	<b>59</b>	<b>321</b>

14. For the Broads Authority, the LHNA identifies an overall affordable housing need from 321 households over the 21-year period 2021-42 (15 per annum).

## Local Housing Need

15. Overall, there is a need for 1,077 dwellings over the 21 year period, or 51.3 dwellings per annum. This is the total need for housing, with the final affordable housing need being 325 dwellings over the 21 year period.

**Figure 4: Overall need for Market and Affordable Dwellings (including affordable home ownership products) by property size in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	19	7	25	22	<b>47</b>
2 bedrooms	110	20	130	94	<b>224</b>
3 bedrooms	118	26	144	500	<b>644</b>
4+ bedrooms	18	7	25	136	<b>161</b>
<b>DWELLINGS</b>	<b>265</b>	<b>60</b>	<b>325</b>	<b>752</b>	<b>1,077</b>

# 1. Introducing the Study

## Background to the Project and Wider Policy Context

### Introduction

- 1.1. Opinion Research Services (ORS) was commissioned in 2022 by Great Yarmouth Borough Council and the Broads Authority to prepare a Local Housing Needs Assessment (LHNA) for the period 2021-2041 to identify the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing.
- 1.2. The 2019 National Planning Policy Framework (NPPF) required local planning authorities to inform strategic policy making with a local housing needs assessment. A Local Housing Needs Assessment (LHNA) was required to be prepared which established a minimum Local Housing Need (LHN) figure, which in turn was set by a Standard Method formula issued by MHCLG. As of late 2021, this gave a figure of 353 dwellings per annum for Great Yarmouth.
- 1.3. The previous Government's policy approach to planning for housing need in National Parks and associated areas such as the Broads Authority was different to that of other Local Planning Authorities. Planning Practice Guidance (PPG) on Housing and Economic Needs at paragraph 14 stated that an area such as the Broads Authority could identify its own housing needs based upon local evidence, rather than follow the national standard method for Local Housing Need set out for local authority areas. As a result, the Broads Authority commissioned ORS to calculate the need for the entire area of the Broads, breaking it down into its 6 constituent districts.
- 1.4. The final outcome of this process was that a 5-year migration trend model was derived which showed a need for 358 dwellings over the 20 year period, or 17.9 dwellings per annum was the best model for the Broads Authority. This is the total need for housing, with the affordable housing need being 153 dwellings over the 20 year period, or 7.6 dwellings per annum.

### Government Policy December 2024

- 1.5. The current Government published an updated version of the NPPF in December 2024. In terms of overall housing need, paragraph 62 still states that:

*62. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

**National Planning Policy Framework, December 2024**

- 1.6. However, PPG has been updated to derive a new methodology for local authority areas based upon their existing number of dwellings and the ratio of median house prices to median incomes in the area. Therefore, the methodology for calculating housing need at a local authority area has been updated.

- 1.7. Importantly, an addition has been made to paragraph 14 of PPG for Housing and Economic Needs Assessment covering National Parks and the Broads Authority:

***Where strategic policy-making authority boundaries do not align with local authority boundaries, or data is not available, should the standard method be used to assess local housing need?***

*Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used.*

*Such authorities may continue to identify a housing need figure using a method determined locally. In doing so authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s).*

*For local authorities whose boundaries cross National Parks or Broads Authority areas, the proportion of the local authority area that falls within and outside the National Park or Broads Authority area should also be considered – for example where only a minimal proportion of the existing housing stock of a local authority falls within the National Park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area.*

**Paragraph: 014 Reference ID: 2a-014-20241212**

- 1.8. Therefore, PPG continues to state that an area such as the Broads Authority is not covered by the standard method for local housing need and that they can consider using a local determined housing need figure. However, it now promotes that the Broads Authority should use an overall needs figure based upon the current size of its dwelling stock and the median workplace affordability ratio for the local authorities which it covers.
- 1.9. In terms of the new methodology, the baseline housing need figure in is derived using the following formula, set out at paragraph 4 of PPG for Housing and Economic Needs Assessment.

***How is a minimum annual local housing need figure calculated using the standard method***

*The standard method calculates a minimum annual local housing need figure as follows:*

***Step 1 - Setting the baseline – 0.8% of existing housing stock for the area***

*Set the baseline using the value of existing housing stock for the area of the local authority. The baseline is 0.8% of the existing housing stock for the area, and the most recent data published at the time should be used.*

***Step 2 - An adjustment to take account of affordability***

*The housing stock baseline figure (as calculated in step 1) is then adjusted based on the affordability of the area.*

*The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level. The mean average affordability over the five most recent years for which data is available should be used.*

*No adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. An authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.*

*Where an adjustment is to be made, the precise formula is as follows:*

*For values of 'five year average affordability ratio' above 5; otherwise zero.*

*Adjustment Factor = ((five year average affordability ratio-5)/5)×0.95 + 1*

**Paragraph: 004 Reference ID: 2a-004-20241212**

- 1.10. For the Broads Authority, our estimate for the current dwelling stock is 3,775 properties based upon the postal address file and the share of the Broads Authority's dwelling contained within the Census Output Areas covering it. 0.8% of 3,755 is 30.2 dwellings and this is the baseline need.
- 1.11. Taking a weighted average of the 5 year average affordability ratio gives a figure of 8.683. Applying this figure as an adjustment factor yields an overall housing need of 51.3 dwellings per annum.
- 1.12. Therefore, for this study, we have used an overall housing need for the Broads Authority of 51.3 dwellings per annum for the period 2021-2042<sup>1</sup>. This gives a total dwelling need of 1,077 dwellings over the 21-year period.
- 1.13. From a plan-making perspective, housing need has to be assessed independently of any constraints. However, the final housing requirement and plan target for the Broads Authority may well be different due to constraints, and the previous 17.9 dwellings per annum figure was already challenging in the context of the Broads Authority's overarching statutory duties to protect the area. It is important to note that the housing need that is identified in this report is part of and not additional to the housing need identified for the Broads Authority's 6 constituent districts.
- 1.14. The remainder of this report explores the impact of a total dwelling need of 1,077 on the need for affordable housing need of the Broads Authority. Much of the Great Yarmouth and Broads Authority LHNA 2022 still remains valid and has not been updated in this report. This report is effectively an addendum to the original report.

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<sup>1</sup> The LHNA 2022 study looked to 2041, but given the time that has passed, in order to ensure the plan period is 15 years on adoption, it has been extended to 2042.

## 2. Demographic Projections

### The starting point for establishing Local Housing Need

#### Demographic Analysis for the Broads Authority

- 2.1. As noted above, the LHNA 2022 included household projections for the Broads Authority. The new standard method introduced in December 2024 does not include any direct input from population or household projections. However, to allow the modelling of affordable housing need it is necessary to develop household projections for the different types of households who are projected to reside in the Broads Authority.
- 2.2. The changes from an overall need from a need on 17.9 dwellings per annum to one with 51.3 dwellings represent a very large step up on the number of households. The LHNA 2022 considered the affordable need based upon the existing population and migration flows to the Broads Authority. If more homes are assumed to be delivered then this will allow more households to form in the area and also more households to migrate into the area. Our modelling in the LHNA 2022 already allowed for future household formation, so our updated modelling in this report assumes higher levels of in-migration to the area.

#### Projected Household Age Profile

- 2.3. Figure 5 show the net change in projected household numbers for The Broads Authority between 2021 and 2042 based on the trend-based projections by household type and age. This data relates to all households, not just those in affordable housing need and it shows how households are likely to change by type and age over the next 21 years. The data is then used to underwrite the modelling of housing need set out below.
- 2.4. Given the overall size of the population for the Broads Authority , the numbers in some categories are small, but overall trends are clear. This shows a growing number of single person households in the area, but also a growth in 'Other' households, some of which are likely to represent adult children of any age living at home with their parents who may be above retirement age.

**Figure 5: Summary of 21-year change by household type and age of household representative for the Broads Authority (Note: Figures may not sum due to rounding. Source: ORS Model)**

Age of Household Representative	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	TOTAL
Single person	-2	8	18	19	4	-25	50	118	191
Couple without children	-3	8	13	-3	28	61	140	104	347
Families with child(ren)	8	47	29	53	24	2	2	4	169
Other households	9	0	3	0	6	9	65	64	156
<b>TOTAL CHANGE</b>	<b>13</b>	<b>64</b>	<b>62</b>	<b>68</b>	<b>62</b>	<b>47</b>	<b>257</b>	<b>290</b>	<b>862</b>
<b>% of Total Change<sup>2</sup></b>	<b>1%</b>	<b>7%</b>	<b>7%</b>	<b>8%</b>	<b>7%</b>	<b>5%</b>	<b>30%</b>	<b>34%</b>	<b>100%</b>

<sup>2</sup> Percentage change in households in the age group in the column heading

# 3. Affordable Housing Need

## Identifying households who cannot afford market housing

### Introduction

- 3.1. The definition of affordable housing was changed by the NPPF 2019, with a specific emphasis now placed on affordable home ownership. This was retained in the NPPF December 2024 update. Annex 2 of the Revised NPPF now defines affordable housing as being:

***Affordable housing***

*Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)*

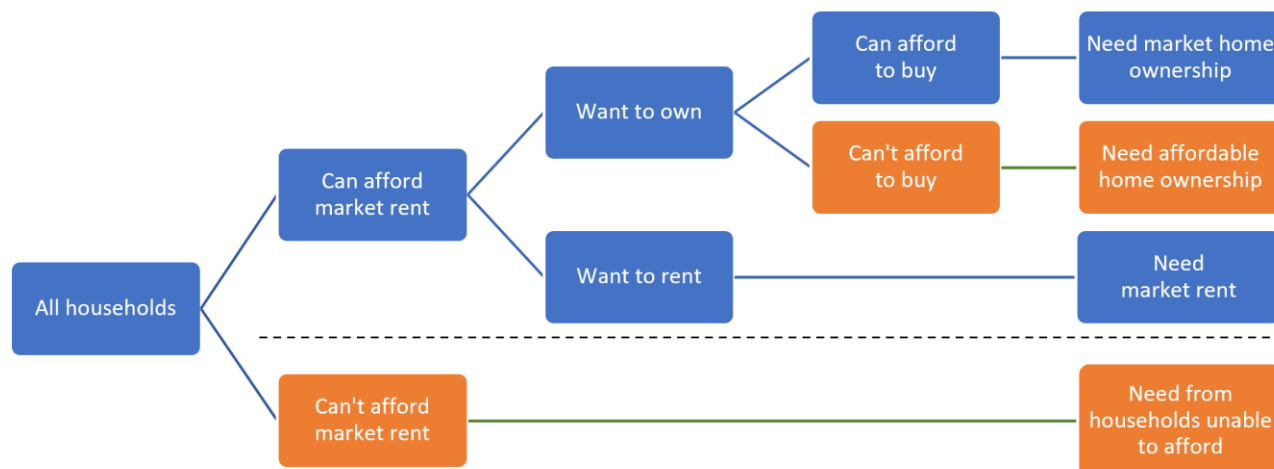
NPPF December 2024, Annex 2

- 3.2. To reflect this change, paragraphs of PPG were updated in February 2019. These were further updated with a new set of guidance on “Housing needs of different groups” published on 22nd July 2019<sup>3</sup>. Further guidance to reflect the need to consider First Homes was then added on May 24<sup>th</sup> 2021.
- 3.3. On this basis, it is clear that the assessment of affordable housing need must now consider those households who would like to own but are unable to do so, in addition to those households unable to afford to own or rent which have formed the longstanding basis for assessing affordable housing needs.
- 3.4. Figure 6 illustrates the different groups of households that must now be considered when assessing the need for affordable housing. The needs of those households that can’t afford market rent need to be added to the needs of those that can afford market rent but who want to own but can’t afford to buy.

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<sup>3</sup> <https://www.gov.uk/guidance/housing-needs-of-different-groups#affordable-housing>

Figure 6: Establishing the need for market and affordable housing



## Affordable Housing Need: Households Unable to Afford

- 3.5. PPG notes that affordable housing need is based on households “*who lack their own housing or who cannot afford to meet their housing needs in the market*” [ID 67-006-20190722]; though goes on to say that this should include the needs of those that can afford market rent but who want to own but can’t afford to buy. Given this context, the following section firstly considers the needs of those households who cannot afford to meet their housing needs, either through buying or renting. The additional needs of those who can afford to rent but who want to own will be considered in the next section.
- 3.6. PPG sets out the framework for this calculation, considering both the current unmet housing need and the projected future housing need in the context of the existing affordable housing stock:

### Current Unmet Need for Affordable Housing

- 3.7. In terms of establishing the **current** unmet need for affordable housing, the PPG draws attention again to those types of households considered to be in housing need; whilst also emphasising the need to avoid double-counting and including only those unable to afford their own housing. The PPG guidance continues:

#### ***How can the current unmet gross need for affordable housing be calculated?***

*Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market.*

...

*Care should be taken to avoid double-counting, which may be brought about with the same households being identified on more than one transfer list, and to include only those households who cannot afford to access suitable housing in the market*

Planning Practice Guidance, ID: 2a-020-20190220

## Establishing Current Unmet Need for Affordable Housing for Households Unable to Afford

- 3.8. Households assumed to be unable to afford housing include:
- » All households that are currently homeless;
  - » All those currently housed in temporary accommodation; and
  - » People in a reasonable preference category on the housing register, where their needs have not already been counted.
- 3.9. Given this context, our analysis counts the needs of all these households when establishing the need for affordable housing at a base date of March 31<sup>st</sup> 2021.
- 3.10. The analysis counts the needs of all households living in overcrowded rented housing when establishing the need for affordable housing, (which could marginally overstate the affordable housing need) but it does not count the needs of owner occupiers living in overcrowded housing (which can be offset against any previous over-counting). Student households are also excluded, given that their needs are assumed to be transient and do not count towards the need for affordable housing.
- 3.11. The analysis does not count people occupying insanitary housing or otherwise living in unsatisfactory housing conditions as a need for additional affordable housing. These dwellings would be unsuitable for any household; and enabling one household to move out would simply allow another to move in – so this would not reduce the overall number of households in housing need. This housing need should be resolved by improving the existing housing stock.
- 3.12. Concealed families are defined as, “family units or single adults living within other households, who may be regarded as potential separate households which may wish to form given appropriate opportunity”<sup>4</sup>. When considering concealed families, it is important to recognise that many do not want separate housing. Concealed families with older family representatives will often be living with another family, perhaps for cultural reasons or in order to receive help or support due to poor health. However, those with younger family representatives are more likely to experience affordability difficulties or other constraints (although not all will want to live independently).
- 3.13. Concealed families in a reasonable preference category on the housing register will be counted regardless of age, but our analysis also considers the additional growth of concealed families with family representatives aged 18-54 years (even those not registered on the housing register) and assumes that all such households are unlikely to be able to afford housing (otherwise they would have found a more suitable home). The needs of these households are counted when establishing the need for affordable housing.
- 3.14. The Broads Authority is not a housing authority, so does not collect information on current housing needs. Therefore, we have apportioned need from the 6 local authorities who include part of the Broads Authority. Figure 7 sets out the assessment of current affordable housing need for The Broads Authority, which shows 62 households currently unsuitably housed and needing to move, with a net need for 40 households.

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<sup>4</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6338/1776873.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6338/1776873.pdf)



**Figure 7: Assessing current unmet gross need for affordable housing – The Broads Authority (Sources: CLG P1E returns; Census 2001, 2011 and 2021; English Housing Survey; DWP Housing Benefit; CLG Local Authority Housing Statistics)**

Current unmet need classification	Current status	Affordable Housing Gross Need	Affordable Housing Supply	Affordable Housing Net Need
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in communal establishments (Bed and breakfast or Hostels)	1		1
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in market housing (Private sector leased or Private landlord)	1		1
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in affordable housing (Local Authority or RSL stock)	0	0	0
Homeless households in priority need [Source: CLG P1E returns]	Households accepted as homeless but without temporary accommodation provided	2		2
Concealed households [Source: Census 2001 and 2011]	Growth in concealed families with family representatives aged under 55	11		11
Overcrowding based on the bedroom standard [Source: Census 2011 and English Housing Survey]	Households living in overcrowded private rented housing	13		13
Overcrowding based on the bedroom standard [Source: Census 2011 and English Housing Survey]	Households living in overcrowded social rented housing	21	21	0
Other households living in unsuitable housing that cannot afford their own home [Source: CLG LAHS]	People who need to move on medical or welfare grounds, including grounds relating to a disability	13	1	12
Other households living in unsuitable housing that cannot afford their own home [Source: CLG LAHS]	People who need to move to a particular locality in the borough of the authority, where failure to meet that need would cause hardship	0	0	0
<b>TOTAL</b>		<b>62</b>	<b>22</b>	<b>40</b>

### Projected Future Affordable Housing Need

- 3.15. In terms of establishing **future** projections of affordable housing need, the PPG draws attention to new household formation (in particular the proportion of newly forming households unable to buy or rent in the market area) as well as the number of existing households falling into need.
- 3.16. The ORS Housing Mix Model considers the need for market and affordable housing on a longer-term basis that is consistent with household projections and the LHN. The Model uses a range of secondary data sources to build on existing household projections and profile how the housing stock will need to change in order to accommodate the projected future population. The Model provides robust and credible evidence about the required mix of housing over the full planning period, and recognises how key housing market trends and drivers will impact on the appropriate housing mix.
- 3.17. Whilst PPG identifies that “Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need.” [ID: 2a-021-20190220], the Model recognises

that the proportion of households unable to buy or rent in the market area will not be the same for all types of household, and that this will also differ by age. Therefore, the appropriate proportion is determined separately for each household type and age group.

- 3.18. The affordability percentages in Figure 8 are calculated using detailed information on existing households living in the local authorities covering the Broads Authority from the 2021 Census alongside data published by DWP about housing benefit claimants. For each type of household in each age group, the table identifies the percentage of households unable to afford their housing costs. The defining factor here is whether a household can pay for their housing without requiring affordable housing or housing benefit. Therefore, this is the proportion of households in each age and household composition group that either occupy affordable housing or receive housing benefit to enable them to afford market housing.

**Figure 8: Assessing affordability by household type and age for Broads Authority (Source: Census 2011 and DWP)**

Percentage unable to afford market housing in The Broads Authority	Under 25	25-34	35-44	45-54	55-64	65+
Single person household	23%	10%	23%	23%	22%	21%
Couple family with no dependent children	21%	7%	10%	9%	8%	13%
Couple family with 1 or more dependent children	67%	33%	20%	13%	13%	28%
Lone parent family with 1 or more dependent children	76%	78%	53%	43%	37%	73%
Other household type	24%	49%	34%	23%	20%	11%

### Establishing the Future Affordable Housing Need for Households Unable to Afford

- 3.19. When considering the number of newly arising households likely to be in affordable housing need, the PPG recommends a “*gross annual estimate*” [ID 2a-021-20190220] suggesting that “*the total need for affordable housing should be converted into annual flows*” [ID 2a-024-20190220].
- 3.20. Together with information on household type, this provides a framework for the model to establish the proportion of households who are unable to afford their housing costs. The following tables look at the impact of different types of household over the longer period of 2021-2042.

**Figure 9: Newly forming and in-migration: Annual components of Household Growth 2021-42 in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Newly forming households	139	102	36	26%
Households migrating into the area	341	270	71	21%
<b>All new households</b>	<b>480</b>	<b>372</b>	<b>107</b>	<b>22%</b>

- 3.21. The ORS Model identifies 139 new households projected to form in the Broads Authority each year, of which 26% will be unable to afford their housing costs. This amounts to 36 households each year.
- 3.22. The model also considers new households migrating to the area. The projection is for 341 households per annum of which 21% (71 households) will be unable to afford their housing costs. Migrating households are less likely to be in housing need because they typically have higher incomes and equity from property elsewhere.
- 3.23. **This results in a total of 107 new households in need of affordable housing per annum in the Broads Authority.**

- 3.24. PPG identifies that “there will be a current supply of housing stock that can be used to accommodate households in affordable housing need” and that it is necessary to establish “the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need” (ID 2a-022).

**Figure 10: Dissolution and out-migration: Annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Household dissolutions following death	192	159	33	17%
Households migrating <u>out</u> of the area	245	190	54	22%
<b>All households no longer present</b>	<b>436</b>	<b>349</b>	<b>88</b>	<b>20%</b>

- 3.25. In the Broads Authority, the model identifies 192 households are likely to dissolve following the death of all household members. Many of these households will own their homes outright however, 33 of these are likely to have been unable to afford market housing, with many living in social rented housing.
- 3.26. In addition, some households that are unable to afford housing will migrate away from the area, so their needs should be discounted to ensure consistency with the household projections. The model identifies that in the Broads Authority 245 households will migrate out of the area each year, including 54 households who are unable to afford their housing costs. A proportion of these will vacate rented affordable housing (which will become available for another household) whereas others that have not yet been allocated an affordable home will reduce the number of households waiting. (It should be noted that some might have chosen to stay if housing costs were cheaper or more affordable housing was available).
- 3.27. Altogether, there are 88 households per annum who will vacate affordable dwellings or will no longer be waiting for a home in the Broads Authority.
- 3.28. PPG also identifies that it is important to estimate “*the number of existing households falling into need*” (ID 2a-021). Whilst established households that continue to live in the local authorities will not contribute to household growth, changes in household circumstances (such as separating from a partner or the birth of a child) can lead to households who were previously able to afford housing falling into need. The needs of these households are counted by the model by considering changes in affordable housing and housing benefit uptake between cohorts in the population, and it is estimated that 17 established households in the Broads Authority will fall into need each year.
- 3.29. However, established households’ circumstances can also improve. For example:
- » When two single person households join together to form a couple, pooling their resources may enable them to jointly afford their housing costs (even if neither could afford separately).
  - » Households also tend to be more likely to afford housing as they get older, so young households forming in the early years of the projection may be able to afford later in the projection period.
- 3.30. These improved circumstances can therefore reduce the need for affordable housing over time. The model identifies that the circumstances of 25 in the Broads Authority will improve such that they become able to afford their housing costs having previously being unable to afford. This is again calculated by analysing flows of households moving into affordable housing and housing benefit claimants between different cohorts in the population.

**Figure 11: Existing households: Annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Existing households falling into need	-	-17	17	100%
Existing households climbing out of need	-	25	-25	0%
<b>Change in existing households</b>	<b>-</b>	<b>9</b>	<b>-9</b>	<b>-</b>

3.31. The following tables (Figure 12) summarise the overall impact of:

- » New households adding to housing need;
- » The households no longer present reducing housing need; and
- » The changes in circumstances impacting existing households.

**Figure 12: Summary annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model Note: Figures may not sum due to rounding)**

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs
All new households	480	372	107
All households no longer present	436	349	88
Change in existing households	-	9	-9
<b>Future affordable housing need 2021-42 (Annual average)</b>	<b>43</b>	<b>32</b>	<b>11</b>

3.32. Overall reviewing the contribution of each element amounts to an additional 11 households needing affordable housing in the Broads Authority annually over the 21-year period 2021-42.

### Overall Affordable Housing Need for Households Unable to Afford

3.33. Below, Figure 13 brings together the information on assessing the unmet need for affordable housing in 2021 and the associated impact on market housing, together with the future need for market and affordable housing arising over the 21-year period 2021-42.

**Figure 13: Assessing total need for market and affordable housing for The Broads Authority ((Source: ORS Housing Model.****Note: Figures may not sum due to rounding)**

The Broads Authority	Housing Need (households) Market housing	Housing Need (households) Affordable housing	Overall Housing Need
<b>Unmet need for affordable housing in 2021</b> (see Figure 7)			
Total unmet need for affordable housing (a)	-	62	62
Supply of housing vacated (b)	26	22	48
<b>Current housing need (c) = (a) - (b)</b>	<b>-26</b>	<b>40</b>	<b>14</b>
<b>Projected future housing need 2021-42</b> (see Figure 12)			
Average annual housing need (d)	32	11	43
<b>Future housing need (e) = (d) x 21</b>	<b>642</b>	<b>221</b>	<b>862</b>
<b>Total need for market and affordable housing (f) = (c) + (e)</b>	<b>615</b>	<b>261</b>	<b>876</b>
Average annual household growth (g) = (f) / 21	31	13	44
Proportion of overall need for market and affordable housing	70.2%	29.8%	100.0%

- 3.34. In the Broads Authority, there is a need to provide affordable housing for 261 households unable to afford to rent or buy over the Plan period 2021-42 (30% of the projected growth) which equates to **13 households per year**.
- 3.35. These levels would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need, but any future losses from the current stock (such as demolition, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.

### Needs of Households Aspiring to Home Ownership

- 3.36. Through combining data on the number of households of each type in each age group living in private rented housing and paying their own rent with the aspiration data from the EHS 2013-14, Figure 14 establishes the number of existing households likely to aspire to home ownership that have not been counted in the affordable housing need. It is important to recognise that all of these households are able to meet their own housing costs in the private rented sector, when they find a dwelling that suits them, so would typically not be considered for social or Affordable Rent.

**Figure 14: Households currently living in the Private Rented Sector in the Broads Authority and paying their own rent that aspire to home ownership by Age of Household Representative (Note: Figures may not sum due to rounding)**

Household Type	15-24	25-34	35-44	45-54	55-64	65+	TOTAL
Single person	5	26	20	12	8	8	78
Couple without children	4	24	11	18	17	8	81
Families with child(ren)	2	28	26	14	0	0	70
Other households	7	0	1	2	1	0	11
<b>Total Volume</b>	<b>17</b>	<b>78</b>	<b>57</b>	<b>45</b>	<b>26</b>	<b>16</b>	<b>240</b>
Percentage of households	7%	33%	24%	19%	11%	7%	100%

- 3.37. Based on this analysis, we can estimate that there is a total of around 240 households currently resident in the Broads Authority who cannot afford to own their own home but would aspire to do so.
- 3.38. In addition to the current need, it is also important to consider new households that are projected to form over the period 2021-2042. Through combining this data with the aspiration data from the EHS, we can

conclude that it is likely that there would be a further 161 households that form over the 21-year period who will be able to afford to pay market rent but unable to afford to own, despite that being their aspiration. **Overall, in the Broads Authority there are likely to be 401 households who aspire to home ownership but who cannot afford to buy their own home over the period 2021-42, a net annual need of 19 per year.**

- 3.39. In the LHNA 2022, the then government policy for affordable home ownership focused upon a housing product entitled First Homes, which are properties to be sold with at least a 30% discount to first-time buyers. However, the current government have removed the promotion of First Homes as a key policy and have allowed areas to consider a wider range of affordable home ownership products such as Shared Ownership and Discount Market Sales. For this report, we have consider Discount Market Sales with a 30% reduction from market pricing, which is consistent with First Homes. We would note that using Shared Ownership or a different level of discount does not impact significantly on the conclusions.
- 3.40. While the figure of 401 households who aspire to home ownership in the Broads Authority sets an upper threshold for the number who could seek to access Discount Market Sales, it would still be the case that these households would require a deposit and to be able to afford to service the cost of a mortgage. We explore the importance of this point below.

## Identifying the Overall Affordable Housing Need

- 3.41. Below, Figure 15 brings together the information on assessing the unmet need for affordable housing in 2021 together with the future need for affordable housing and those aspiring to home ownership arising over the 21-year period 2021-42. All data relates to households and this will be converted to dwellings when we add a vacancy rate in the next chapter. It can be noted that this assessment has no regard for whether those aspiring can access affordable home ownership options; some may be able to afford home ownership but have not found a suitable property yet.

**Figure 15: Total need for affordable housing 2021-2042 – The Broads Authority (Source: ORS Housing Model)**

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Overall Affordable Housing Need
Current housing need in 2021	40	240	280
Future housing need 2021-42	221	161	382
<b>TOTAL HOUSING NEED</b>	<b>261</b>	<b>401</b>	<b>662</b>

- 3.42. In the Broads Authority we can conclude that the overall need for affordable housing would comprise a total of 662 households over the 21-year period 2021-2042, equivalent to an average of 32 per annum.
- 3.43. Given that the need for affordable housing and affordable home ownership in particular is very high, it is necessary to consider how this need can be addressed within the overall need established.
- 3.44. It will be important to plan for the needs of **all** households unable to afford to rent or own market housing if they are going to avoid the number of housing benefit claimants living in private rented housing increasing.
- 3.45. It is important to recognise that the figures for those who aspire to home ownership are based upon those households who currently can afford market rent. But these households would not necessarily choose new build Affordable Home Ownership if it was available, as some may prefer to secure full ownership in the less expensive second-hand housing market. Similarly, some households may not ultimately need affordable home ownership if their circumstances change to such a degree that they are eventually able to buy without

financial assistance. It is also important to recognise that the identified demand could only be realised if Affordable Home Ownership products can be delivered at prices that are truly affordable in the area, in line with local house prices and incomes.

- 3.46. Neither the NPPF nor PPG identify that any affordability criteria should be applied to those households who aspire to home ownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford affordable home ownership products if they were provided. Whilst a range of affordable home ownership products are available, each with different costs and eligibility criteria, we have considered Discount Market Sales at 70% of market prices.
- 3.47. Given this context, Figure 16 identifies those households with income that would be insufficient to afford 70% of newbuild prices at the lower quartile for the local area, those households with savings of less than £5,000, and those households that both have sufficient income and savings to purchase an open market property but nonetheless choose to rent. This is based on further analysis of the EHS data which considers the income distribution and savings data for households that rent privately but aspire to home ownership. This data has been updated to reflect current income levels and scaled for each local area using indices from the ONS gross disposable household income (GDHI) tables.

**Figure 16: Affordable home ownership housing mix by household affordability in the Broads Authority 2021-2042 (Source: ORS Housing Model)**

The Broads Authority	All households aspiring to home ownership	MINUS households able to afford market home ownership	Households unable to afford market home ownership	MINUS households unable to afford 70% of newbuild LQ	Households able to afford 70% of newbuild LQ	MINUS households with savings of less than £5,000	Households able to afford and have savings of £5,000 or more
1 bedroom	44	11	33	8	25	19	7
2 bedrooms	153	27	126	34	92	72	20
3 bedrooms	174	22	152	39	113	87	26
4+ bedrooms	30	3	27	11	16	9	7
<b>TOTAL</b>	<b>401</b>	<b>63</b>	<b>338</b>	<b>92</b>	<b>246</b>	<b>187</b>	<b>59</b>

- 3.48. On this basis, 59 dwellings are needed for households that aspire to home ownership but cannot afford it, who also have at least £5,000 in savings and incomes above the relevant threshold. This is 15% of the total that was originally identified.
- 3.49. Whilst it will be a policy decision as to how much of the additional need for affordable home ownership from households able to afford market rent should be provided, in the Broads Authority, it would seem appropriate to only plan for the needs of those 59 households likely to form an effective demand (i.e. those able to afford the various products that will potentially be available) in addition to the 261 households unable to afford to rent or own market housing.

**Figure 17: Overall need for Affordable Housing 2021-42 in The Broads Authority, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Affordable Housing (Households)
1 bedroom	18	7	25
2 bedrooms	109	20	129
3 bedrooms	117	26	143
4+ bedrooms	18	7	25
<b>TOTAL HOUSING NEED</b>	<b>261</b>	<b>59</b>	<b>321</b>

- 3.50. For the Broads Authority, the LHNA identifies an overall affordable housing need from **321 households<sup>5</sup>** over the 21-year period 2021-42 (15 per annum).

<sup>5</sup> 151 households, before converting the need to 153 dwellings in Figure 18.



# 4. Overall Housing Need

## Local Housing Need based on the Standard Method

### Establishing the Housing Target

- 4.1. The overall housing need of 1,077 dwellings provides the starting point for establishing the final housing requirement which will be planned for through strategic policies. This is confirmed by PPG at the outset of the section on assessing housing and economic development needs:

*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*

Planning Practice Guidance, ID 2a-001-20190220

- 4.2. In determining the local plan housing target, it will be necessary for the Broads Authority to consider whether or not the housing need can be met within their area, taking account of any constraints on land availability.
- 4.3. Where planning authorities are unable to meet their LHN in full, it will be necessary for them to engage with neighbouring authorities through the Duty to Cooperate discussion. This should establish if any of the identified housing need that isn't able to be delivered locally (the "unmet need") could be provided for in other areas. It is important to note that the housing need that is identified in this report is part of and not additional to the housing need identified for the Broads Authority's 6 constituent districts.

### The Broads Authority: Overall Housing Need for 2021-42

- 4.4. Previously, Figure 17 set out the affordable housing need growth for the Broads from 2021-42. To convert this to dwellings requires the application of a vacancy and second homes dwelling rate to allow for the fact that at any one time some properties will be empty. A low rate of 1.5% has been allowed for in the affordable housing sector to reflect the low rates of vacancies in this stock. In the LHNA 2022, we allowed a rate of 18.9% in the market sector to allow for the high rate of second and vacant homes and this has been repeated in this study.
- 4.5. Overall, there is a need for 1,077 dwellings over the 21 year period, or 51.3 dwellings per annum. This is the total need for housing. The affordable housing need is 325 dwellings over the 21 year period, or 15.5 dwellings per annum. The figure of 325 dwellings includes all of the backlog of current affordable need, newly arising need and any need for affordable home ownership. This figure is consistent with the standard method for Local Housing Need for the 6 local authorities covering the Broads Authority, but allows for the differences in population structure between the Broads Authority and the wider local authorities.
- 4.6. We would note that the Broads Authority have regard to the affordable housing policies of the relevant district. The Broads Authority currently seek off-site affordable housing contributions for schemes of 6-9 dwellings, but are seeking to lower the threshold in their emerging plan.

4.7. Figure 18 and Figure 19 shows the data for the Broads Authority.

**Figure 18: Overall need for Market and Affordable Dwellings (including affordable home ownership products) by property size in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	19	7	25	22	47
2 bedrooms	110	20	130	94	224
3 bedrooms	118	26	144	500	644
4+ bedrooms	18	7	25	136	161
<b>DWELLINGS</b>	<b>265</b>	<b>60</b>	<b>325</b>	<b>752</b>	<b>1,077</b>

**Figure 19: Overall need for Market and Affordable Dwellings as percentages of the LHN (including affordable home ownership products) by property size in the Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)**

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	1.7%	0.7%	2.4%	2.0%	4.4%
2 bedrooms	10.2%	1.8%	12.1%	8.7%	20.8%
3 bedrooms	11.0%	2.5%	13.4%	46.4%	59.8%
4+ bedrooms	1.7%	0.7%	2.3%	12.7%	15.0%
<b>DWELLINGS</b>	<b>24.6%</b>	<b>5.6%</b>	<b>30.1%</b>	<b>69.9%</b>	<b>100.0%</b>

4.8. It is also possible to calculate the housing need for the Broads Authority by local authority area. Figure 20 shows the distribution of the housing need by local authority area. Taking an example of North Norfolk, 293 dwellings identified are being needed in the Broads Authority within North Norfolk over the period 2021-42. This is a total figure, not an annual rate which is 14 dwellings per annum. It is also part of the existing total for North Norfolk, which is currently 932 dwellings per annum under the December 2024 standard method figures, and should not be added to figures calculated earlier. Therefore, it is clear that the housing need for the Broads is very small and has only a marginal impact on meeting the needs of local authorities in the area.

**Figure 20: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2021 Census. Note: figures may not sum due to rounding)**

The Broads Authority	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
Overall need 2021-2042	316	293	17	204	177	70
Annual average need	15	14	1	10	8	3

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# Appendix B

## Glossary of Terms

### Definitions

**Affordability** is a measure of whether housing may be afforded by certain groups of households.

**Affordable housing** includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. For the purpose of this report we have used the definition in the Revised NPPF, which specifies the main categories of affordable housing to be: affordable housing for rent; starter homes; discounted market sales housing (sold at a discount of at least 20% below market value); shared ownership, relevant equity loans, other low cost homes for sale and rent to buy.

**Affordable Rent** is provided by social landlords and rented for less than would be paid if renting privately. It must be at least 20% cheaper than the equivalent private rent in the area and must also be below the value of the Local Housing Allowance in the area.

**Census Output Area** is the smallest area for which UK Census of Population statistics are produced. Each Census Output Area had a population of around 250 people with around 100 dwellings at the time of the 2011 Census.

**Concealed families** are defined as; *“family units or single adults living within other households, who may be regarded as potential separate households which may wish to form given appropriate opportunity”*<sup>6</sup>.

**Discount Market Sales** are discounted market sale units which must be sold with at least a 20% discount in perpetuity.

**First Homes** are discounted market sale units which must be sold with either a 30%, 40% or 50% discount in perpetuity to a person or persons meeting the First Homes eligibility criteria.

**Headship rates** are defined by CLG as: *“the proportion of people in each age group and household type who are the ‘head’ of a household”*<sup>7</sup>

**A household** is one person living alone, or two or more people living together at the same address who share at least one meal a day together or who share a living room.

**Household formation** refers to the process whereby individuals in the population form separate households. ‘Gross’ or ‘new’ household formation refers to households that form over a period of time, conventionally one year. This is equal to the number of households existing at the end of the year that did not exist as separate households at the beginning of the year (not counting ‘successor’ households, when the former head of household dies or departs). ‘Net’ household formation is the net growth in households resulting from new households forming less the number of existing households dissolving (e.g. through death or joining up with other households).

**Housing demand** is the quantity of housing that households are willing and able to buy or rent.

<sup>6</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6338/1776873.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6338/1776873.pdf)

<sup>7</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/182427/MethodologyFinalDraft.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/182427/MethodologyFinalDraft.pdf)

**Household income** includes all salaries, benefits and pensions, before deductions such as tax and National Insurance.

**Housing need** is the quantity of housing required for households who are unable to access suitable housing without financial assistance.

**Housing requirements** encompasses both housing demand and housing need, and is therefore the quantity of housing necessary for all households to have access to suitable housing, irrespective of their ability to pay.

**Housing type** refers to the type of dwelling, for example, flat, house, specialist accommodation.

**Low cost home ownership** or **Shared ownership** is intermediate affordable housing designed to help people who wish to buy their own home, but cannot afford to buy outright (with a mortgage). Through this type of scheme you buy a share in the property with a Housing Association or other organisation.

**Lower quartile** means the value below which one quarter of the cases falls. In relation to house prices, it means the price of the house that is one-quarter of the way up the ranking from the cheapest to the most expensive.

**Market housing** is private housing for rent or for sale, where the price is set in the open market.

**Migration** is the movement of people between geographical areas. In this context it could be either local authority districts, or wider housing market areas. The rate of migration is usually measured as an annual number of individuals, living in the defined area at a point in time, who were not resident there one year earlier. Gross migration refers to the number of individuals moving into or out of the authority. Net migration is the difference between gross in-migration and gross out-migration.

**A projection of housing needs or requirements** is a calculation of numbers expected in some future year or years based on the extrapolation of existing conditions and assumptions. For example, household projections calculate the number and composition of households expected at some future date(s) given the projected number of residents, broken down by age, sex and marital status, and an extrapolation of recent trends in the propensity of different groups to form separate households.

**Secondary data** is existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Census, national surveys).

**Shared ownership** see Low Cost Home Ownership.

**Social rented housing** is provided by social landlords and rented for less than would be paid if renting privately. It typically has lower rents than Affordable Rent.

## Acronyms and Initials

<b>BRMA</b>	Broad Rental Market Area
<b>CLG</b>	Department for Communities and Local Government (now MHCLG)
<b>DWP</b>	Department of Work and Pensions
<b>LA</b>	Local Authority
<b>LHA</b>	Local Housing Allowance
<b>LHN</b>	Local Housing Need
<b>LHNA</b>	Local Housing Needs Assessment
<b>MHCLG</b>	Ministry for Housing, Communities and Local Government
<b>NPA</b>	National Park Authority
<b>NPPF</b>	National Planning Policy Framework
<b>ONS</b>	Office for National Statistics
<b>ORS</b>	Opinion Research Services
<b>PPG</b>	Planning Practice Guidance
<b>RSL</b>	Registered Social Landlord
<b>SHMA</b>	Strategic Housing Market Assessment



# **Local Plan for the Broads Affordable Housing Topic Paper March 2025**

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## 1: Introduction

The current Local Plan for the Broads includes a policy that seeks off-site affordable housing contributions from schemes between 6 and 9 dwellings. The proposed policy in the emerging Local Plan seeks to continue off-site affordable housing contributions from schemes of fewer than 10 dwellings, but changes the threshold (see section 3). This Topic Paper seeks to justify the proposed approach.

## 2: Current policy

The current adopted affordable housing policy in the [2019 Local Plan](#) is policy DM34. This says:

Developments of 6-9 dwellings will be required to contribute a commuted sum (off-site contribution) towards the provision of affordable housing. This contribution will be calculated in accordance with the full requirements of the adopted standards and policies of the relevant District Councils. The commuted sum will be calculated in relation to thresholds and proportion of dwellings which should, subject to viability, be affordable. The commuted sum should reflect the subsidy required to deliver the affordable housing requirement off site (to include the cost of land and construction).

## 3: Proposed policy

The proposed affordable housing policy in the emerging Local Plan continues the approach of seeking off-site affordable housing contributions, but changes the threshold as follows:

- Sites on brownfield land, off-site contributions sought on schemes of 5 to 9 dwellings inclusive.
- Sites on waterfront brownfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.
- Sites on greenfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.

## 4: Justification for proposed policy

### 4.1 Average size of permissions

The Broads Authority has permitted the following numbers of net new dwellings over the last ten years (from 2014 to 2024). This data excludes holiday homes and replacements dwellings.

**Table key:**

Waterfront brownfield	Brownfield	Greenfield
-----------------------	------------	------------

Application Number	Proposal	Net New
BA/2015/0148/FUL	Change of use of outbuilding to residential dwelling	1
BA/2015/0246/FUL	Proposed conversion of part of a redundant barn complex to form 2no dwellings.	2
BA/2015/0277/FUL	Demolition of detached bungalow and garage and construction of 4 no. Dwellings, associated car parking bays and associated works.	4
BA/2016/0065/FUL	New dwelling.	1
BA/2016/0408/FUL	Demolition of two existing buildings and erection of a new detached dwelling	1
BA/2017/0103/OUT	Outline application to redevelop Hedera House to form 6 residential dwellings and 10 new holiday cottages.	6
BA/2017/0151/FUL	Single storey dwelling and associated garden and walls.	1
BA/2017/0191/FUL	The conversion of a redundant agricultural building to a single dwelling, including associated building and landscaping works and the change of use of an existing dwelling to provide a dedicated tourism use.	1
BA/2017/0474/FUL	2 new dwellings and associated hard & soft landscaping	2
BA/2018/0248/FUL	Replace cottage with new dwelling and holiday unit.	1
BA/2018/0359/FUL	Demolition of shed, erect timber clad boat workshop, 3 residential dwellings, car park, flood defence wall and landscaping	3
BA/2018/0374/FUL	New dwelling.	1
BA/2019/0018/FUL	Conversion of 1 x 4-bed flat to 1 x 2-bed and 1 x 1-bed flats. Replace 3 windows, install 3 rooflights (retrospective).	1
BA/2019/0112/FUL	Erection of 3 terraced houses and associated parking & storage	3
BA/2019/0118/FUL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	7
BA/2020/0053/FUL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	2
BA/2020/0408/FUL	Demolition of existing dwelling (Westerley) & erection of replacement dwelling and erection of new dwelling on neighbouring plot (The Moorings).	1
BA/2021/0084/FUL	Sub-divide shop into 2 units, new shop fronts and 1x flat to the rear	1
BA/2021/0181/FUL	Residential development of 2no. semi-detached townhouses and 2no. detached houses	4
BA/2021/0233/FUL	Three bedroom detached bungalow.	1

The total number of net new dwellings is: 44 dwellings

The total number of applications for net new dwellings is: 21 applications

The average size of schemes for net new dwellings that came forward over the last ten years in the Broads is: 2.10 dwellings.

The most common size of schemes that come forward in the Broads is: 1 dwelling.

The largest scheme for net new dwellings that has come forward in the last ten years is: 7 dwellings.

The number of schemes for net new dwellings, permitted over the last ten years, that could have resulted in off-site affordable housing contributions, if the proposed policy had have been in place is set out in the following table. Please note that one of the waterfront brownfield schemes did result in an off-site affordable housing contribution using the currently adopted threshold (see section 4.3).

Location	Number of schemes
Waterfront brownfield	2
Greenfield	2
Brownfield	1

**The data shows that there are some schemes of 3 dwellings and above that have come forward over the last ten years, even though the most common scheme size for net new dwellings is 1 dwelling. The current threshold of 6-9 dwellings resulted in 1 scheme providing off-site affordable housing contribution. The proposed thresholds would have resulted in 5 schemes providing off-site affordable housing contributions.**

## 4.2 Viability

The [Viability Assessment](#) of the emerging Local Plan assessed the proposed threshold for off-site affordable housing. The study concludes that: *'An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs'*.

**The Viability Assessment of the Local Plan concluded that with all the policy requirements, the policy thresholds as set out in section 3 were viable (giving headroom to mitigate for nutrient enrichment).**

### 4.3 Success of current policy

Since 2019, the current policy has been used at one site. Two applications were combined to give a total of 9 new dwellings which triggered the 6-9 dwelling threshold for a commuted sum and affordable housing contributions were secured.

Planning Application	Location	Description of development	Amount
BA/2019/0118/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	£39,000
BA/2020/0053/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	£3,788

**The current policy has delivered some off-site affordable housing contributions.**

### 4.4 Support from previous Inspector

The [Report](#) (page 13) by the Inspector who examined the current 2019 Local Plan concluded the following in relation to policy DM34 seeking off-site affordable housing contributions for schemes of 6 to 9 dwellings: *‘overall I am satisfied that, in the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified’*. The following are the relevant paragraphs from the Report.

*57. Policy PUBDM33 specifies that developments of 6 to 10 dwellings in the Broads are required to contribute a commuted sum towards affordable housing. This is Broads Authority Local Plan, Inspector’s Report 15 April 2019 14 lower than the national threshold for seeking affordable housing, as established in the Written Ministerial Statement dated 28 November 2014. However, most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. In this context such sums, although modest in scale, would be proportionally significant and would make an important contribution towards additional affordable housing in the Broads.*

*58. The viability evidence shows that schemes of 6+ dwellings could support affordable housing contributions, based on a percentage of 33% as established in the Greater Norwich Core Strategy, and the policy allows flexibility to deal with circumstances where viability is an issue. The Greater Norwich rate falls within the range of different percentages sought by other districts, albeit towards the upper end. As such it represents a reasonable basis for assessment. North Norfolk is a designated rural area, and therefore lower thresholds may be explored through the review of the North Norfolk Local Plan. Overall I am satisfied that, in*

*the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified. The Authority has proposed that the commuted sum threshold should be adjusted to align with the amended threshold of 10+ for seeking affordable housing, as set out in the NPPF 2019. Although the Plan is being examined under transitional arrangements and against the 2012 NPPF, I consider this approach provides clarity and is justified. The policy as modified in M52 therefore seeks commuted sums from schemes of 6-9 units.*

*59. I have amended M52 as published to clarify that commuted sums from schemes of 6-9 units will be sought consistently across the Broads Executive Area. This reflects the approach specified in the supporting text, the table in Policy PUBDM33 and in the Authority's evidence base, and removes the inconsistent and unclear text relating to North Norfolk.*

M52 can be found here: [Broads-Local-Plan-SCHEDULE-OF-Main-Modifications.pdf](#).

**The Inspector who examined the current Local Plan for the Broads was supportive of a threshold for off-site affordable housing lower than national policy. She acknowledged that most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. These circumstances have not changed and are relevant for this emerging Local Plan.**

#### 4.5 Affordable housing need

PPG notes that affordable housing need is based on households “who lack their own housing or who cannot afford to meet their housing needs in the market” [ID 67-006-20190722]; though goes on to say that this should include the needs of those that can afford market rent but who want to own but can't afford to buy.

The **Local Housing Need Assessment** for the Broads identifies an affordable housing need of 15.5 dwellings per year for the period 2021 to 2042.

**The data in section 4.1 shows that larger schemes are very rare. Without the off-site threshold being lower than national policy, given the very small size of permissions for net new dwellings in the Broads it is unlikely that any affordable housing will come forward in the Broads between 2021 and 2042 and therefore the identified need will not be met.**

#### 4.6 Future supply of housing

With much of the Broads Authority Executive Area covered by nutrient enrichment constraints, applications for net new dwellings have been lower than would have been expected, even given the erratic nature of windfall in the Broads. With more nutrient enrichment mitigation schemes coming into place (through Norfolk Environment Credits as well as potentially through Natural England), more schemes for net new dwellings could come forward.

**Whilst there are no projections for what windfall over the coming years could be, the Authority considers there may be opportunities for schemes of three or more dwellings to come forward through the plan period.**

#### 4.7 Holiday Homes

The Broads Authority has permitted (2014 to 2024) 33 holiday homes as part of 14 planning applications for holiday homes or second homes (excluding camping and glamping sites).

**The high demand for holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.**

### 5: Policies of our Districts

The Local Plan for the Broads has regard to/defers to the affordable housing policies of the 6 districts/borough/city councils (the Districts). This is a long accepted approach and reflects that the Districts are the Housing Authority for the Broads and it is logical to have a consistent policy approach across a District, regardless of whether a scheme is in the District or the Broads for planning purposes.

Five of the six districts do not have policies that seek affordable housing below the NPPF threshold. North Norfolk District Council's emerging Local Plan seeks affordable housing on schemes fewer than 9 dwellings however, as some of their area, including parts of the Broads in North Norfolk, are Designated Rural Areas.

Given the justification set out in section 4 of this report, and to reflect that 5 out of 6 Districts do not have policies for less than 9 dwellings, it is prudent to have wording in our Affordable Housing policy to reflect the stance set out in this Topic Paper.

In practice, both our policy and the policy of the District's Local Plan will be used to determine the off-site contribution, working with the relevant Housing Team and their rates, thresholds and guidance.

### 6: Summary and conclusion

The 2024 NPPF says that *'Provision of affordable housing should not be sought for residential developments that are not major developments other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)'*.

However, there is a very limited supply of any suitable sites in the Broads for housing to meet local affordable housing need due to the protected landscape of the area, and to the extent and severity of flood risk. The opportunities for schemes of 9+ dwelling are significantly diminished by the rural character of the area and the environmental constraints. In addition, the high demand for second/holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.

In recent years (between 2014 and 2024), applications for dwellings have been on average 2.10 dwellings per application<sup>1</sup> (according to an assessment of the Authority's planning applications). Presuming that this size of windfall housing applications continues it is unlikely that any affordable housing will be delivered.

There is a clear need for affordable housing in the Broads and all possible reasonable measures should be taken to address the deficiency. It is acknowledged that the policy goes further than the NPPF by requiring off-site contributions to affordable housing for schemes of fewer than 9 dwellings. Five of the districts relevant to the Broads do not seek affordable housing on schemes of 9 or below and their policies reflect this, but North Norfolk's emerging Local Plan does seek affordable housing on schemes below 9 dwellings to reflect it part of the area being a Designated Rural Area. The Viability Study that assessed the Local Plan has concluded that the proposed policy approach to seeking off-site affordable housing contributions in the Broads is viable.

The Broads Authority will use the relevant council's methodology for the calculation of affordable housing contributions figure. The Authority will liaise with the relevant council to prioritise spend which will be first in the parish which generated the commuted sums, then to the adjoining parishes, and then to anywhere in the council area and the Authority/District will have ten years to spend or commit the monies. The Authority will however have regard to the approach of the relevant council in where the money is spent and for how long the money is held.

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<sup>1</sup> Since April 2019, there have been 37 net new market dwellings permitted in 17 applications.