North East Lincolnshire Housing and Development Board

Local Plan: Affordable and non-Market Housing Delivery Review

(Final draft)

September 2016
North East Lincolnshire Housing and Development Board: Affordable and non-Market Housing Delivery Review  (10.09.16)

Executive summary

There is a substantial housing need in North East Lincolnshire and wider housing market growth driven by local economic growth should enable a significantly greater supply of Affordable Housing to be delivered. As now, this won't meet all of the affordable housing need and continued reliance on the Private Rented Sector and providing a wider range of housing products, including low cost home ownership, will be key parts of the solution. The area already benefits from low cost housing, but wage levels are also low. In the inner areas of Grimsby much low cost rental housing – both public and private – is of an unacceptable standard with the resulting high void rates, high turnover and other aspects of deprivation that deter new investment, public or private. With the ending of grant for general need rental housing, previous models of affordable housing provision need to be replaced, not only by offering a wider range of housing products, but through facilitating developer led multi-tenure projects by the assembly of suitable sites and developer incentives. Alongside the increased delivery of affordable homes arising from higher open market housing growth across the wider North East Lincolnshire area, attracting further “Freshney Green” type projects to the inner areas will be critical to recreating viable housing markets there and in turn contribute to the Plan’s wider objectives on the town centre and regeneration. A good start is being made on a new set of public/private housing initiatives which have the potential to lead to this more strategic approach but this will require a major ongoing commitment.

1 Introduction

1.1 NELC has commissioned a supplementary statement from the NEL Housing and Development Board to inform consideration of affordable and non market housing policies, looking at local market conditions, wider changes likely to affect delivery including national housing policy and finance, and new measures needed to support an updated forward trajectory for delivery in the North East Lincolnshire area for the Local Plan period. This statement has been subjected to external review and the terms of reference, background, and a list of those who have contributed to the review are at Annex A.

1.2 This statement specifically examines:

- Housing need and how it is currently met;
- Wider housing market factors;
- What new approaches could be advanced;
- Progress on a programme of intervention ;
- What affordable housing delivery could be achieved; and,
- What are the critical assumptions and dependencies .
2. Context

2.1 The context for this review is set by the pre-submission Local Plan and supporting studies including the Strategic Housing Market Assessment 2013. “Affordable housing” is defined in the National Planning Policy Framework (NPPF) as follows: “Affordable housing is provided for people who are unable to access or afford market housing. Eligibility is determined with regard to local incomes and local house prices. Provision should be made for affordable housing to remain at an affordable price for future eligible households or for the subsidy to be recycled to provide alternative affordable housing provision (NPPF Annex 2, CLG, 2012).

2.2 Evidence on housing need is set out in the Local Plan drawing on the Strategic Housing Market Assessment (2013) (SHMA) and this highlights the particular challenges of the NEL Housing Market in which house prices are relatively low when compared to other parts of the country, but average household incomes are also relatively low and so there are a large number of households who do not have an income high enough to enable them to access market housing. The SHMA identified a net affordable housing need of at least 586 dwellings per annum over the next five years in order to clear the existing backlog of households in need and meet future arising household need.

3. How need for Affordable Housing is being met at present?

3.1 It seems clear that a substantial affordable housing need is likely to continue in North East Lincolnshire although some of the definitions and indicators used need further development and refinement to provide a more accurate guide. This housing need is not being effectively met at present with impacts on people, on the housing stock, and on investment. Key points are:

i. Continuing need is exemplified by statutory homelessness as evidenced by the 88 Category 1 acceptances by NELC in 2015-16 and around 600 “threat of homelessness” priority cases dealt with each year (and homelessness avoided) by the Council’s housing support services. The general housing waiting lists maintained by Home Choice Lincs (a joint service on behalf of NEL and North Lincs Councils) show that in 2015/6 around 350 households (of which roughly one third are transfers) were housed each quarter in properties in North East Lincolnshire through this service. However a high proportion of applications fail to result in a bid for a property or even a property viewing although this could reflect applicants looking to move to more suitable accommodation eg elderly tenants seeking ground floor homes.

ii. Only a small proportion of need can be met through the new high quality affordable housing which has been successfully procured through planning policy (s106) by NELC in recent years (278 homes over 5 years to 2015/6) either via transfer of land or purchase of units at discounted price and through cross subsidy within large Registered Provider developments such as the Freshney Green scheme.

iii. A high proportion of housing need cases are currently likely to secure some form of low cost accommodation in the Private Rented Sector (PRS). The area benefits from an
unusually large Private Rented Sector (PRS). Some is high quality but major parts of this stock do not offer minimum acceptable standards or type of property required to meet affordable housing need. Deteriorating properties, often acquired remotely at auction, prove to be unlettable with subsequent boarding up or abandonment. This is reflected in the high void rates for North East Lincolnshire – in 2015 this was 4.3% of total dwelling stock, of which over 700 are classed as long term empty (in recent years NELC has brought around 70 per annum back into use through a mix of grant, loan and private sector leasing);

iv. There is also evidence of high turnover and transfers between public and private low cost, low demand accommodation which creates further problems. Parts of the PRS can be seen to offer slightly cheaper but poor quality accommodation while a move into Registered Provider(RP)/Housing Association accommodation will benefit from higher standards and lower energy costs in winter. However for the housing provider this creates additional costs, higher rent arrears and lost revenues. High turnover rates threaten profitability (and hence investment potential) of the provider. Shoreline, the major social housing registered provider lets around 1 in 8 of its homes each year with turnover rates over 15%, of which transfers are about a third. In 2014-5 379 homes (just under 5% of its stock) were empty at the end of the year.

v. An aspect of housing need which is both an increasing priority and a development opportunity is housing for the elderly, particularly as the desire for this is in more central areas with good access to transport and services.. The Local Plan refers to the 65+ age group growing from 18% of the population to 27% by 2035 and includes policies to support this component of housing need. The Council and Clinical Commissioning Group have recently helped procure a 60 purpose built apartment Extra Care scheme at Strand Court but further projects will be considerably more challenging due to reduced Housing Benefit levels. Though not an Extra Care scheme, an example of a RP/developer led schemes which can contribute to this need is the 400 home “retirement community” scheme by Longhurst Group now under way at Humberston Avenue.

4. Wider Housing market factors

4.1 Taken as a whole the North East Lincolnshire housing market functions effectively with a good local demand for new housing and a supply strengthened by the strong presence of local builders and developers although national and regional level developer interest in promoting new schemes in the area at present is fairly limited. While overall housing growth prospects are good, this overview masks some sharp divergence and imbalance between the component local market areas which is getting more severe. If not tackled effectively this threatens serious damage to not only to the wider housing market but also the inward investment and town centre renewal objectives reflected in the Local Plan. Broadly the main component local market areas in NEL can be categorised as follows:

i. The suburban and rural fringe of greater Grimsby together with nearby villages with good links and services such as Waltham, New Waltham and Laceby (the arc settlements) are areas in high demand and while sites in the rural fringe may involve difficult planning issues, there is good viability and the potential to generate contributions to affordable housing and local services via s106 or CIL;
ii. The urban area of Cleethorpes and the adjoining seaside/coastal strip together with the higher quality and leafy Victorian and inter war areas of Grimsby to the south of the railway are seeing rising values and housing investment across several types of property. In most locations, new development is viable and usually able to generate a contribution to S106/CIL priorities.

iii. Inner areas made up principally of the East and West Marsh areas of Grimsby (postcodes DN31 and DN32 - approximately 10,000 houses) developed as part of the fishing and port based large scale Victorian expansion of Grimsby. Although these areas include some more recent development, the housing stock is still mainly terraced and unmodernised in a mix of RP, PRS and owner occupation with many streets affected by poor housing conditions, high turnover, high void rates and low values/rent levels (in some neighbourhoods PRS rents are below that of social housing). Parts are highly deprived in terms of education, health, employment and suffer from significant crime and ASB issues. The East Marsh includes an LSOA (area measured in national Index of Multiple Deprivation) ranked 13th most deprived nationally and has been the subject of several previous regeneration initiatives. Development is typically made up of small scale conversions of redundant commercial buildings, sub division of larger properties and small scale windfall sites. In order to reduce the overhang of stock which cannot be brought up to standard viably, Shoreline, the major provider has embarked on a demolition programme of around 650 homes in the Freeman St/Comber Place area of East Marsh and is considering a further programme of stock rationalisation;

iv. Immingham has many features in common with area ii above - values for many types of property have risen driven by the major growth achieved in ports and logistics businesses at the nearby port. However some developments have issues in common with the Grimsby Inner Areas above and are at risk of decline

v. A fifth market can be considered to comprise the more remote area small villages with few services and with little potential for development (as set out in the Local Plan). The Local Plan makes specific provision for local affordable needs through an exception based approach.

4.1. The inter-relationship between these market areas is also important. Continuing growth in the housing market and rising levels of market housing development across the North East Lincolnshire area as a whole will increase the resource available for affordable housing and provide a greater range of housing options and tenures. The challenge is to harness this growth in a way which prevents a sharpening divide between “inner” and “outer”, to reverse the decline in the inner area which damages the market perception of the wider area for buyers and developers and impacts on investment potential in the town centre which it adjoins. Existing low rent, low value and high turnover problems in the inner areas are highlighted in Section 3 above. Several current policies are likely to create additional negative pressure:

i. Both Registered Providers and private landlords are losing income as Housing Benefit and Local Housing Allowance reductions take effect;
ii. New Registered Provider schemes will not benefit from previous high HCA grant rates (up to £25-30k per unit) and in addition new projects must factor in higher build costs (for example flood defence requirements);

iii. The ability to support social rented housing investment via s106 is likely to be significantly reduced with the introduction of the Starter Homes option for developers, although some are likely to continue to prefer the advantage of a s106 which allows early sale of units to an RP. Starter Homes are not viable in the inner area as, even with this reduction, new build costs would push sales prices well above those of existing stock;

iv. Profitability for investors and landlords in the PRS will further decline with the reduction of tax advantages and mandatory Energy Performance requirements from April 2018 (minimum standard ‘E’ on Energy Performance Certificates). Declining PRS property will also harm investment potential of new schemes by Registered Providers.

5. New approaches to overcome threatened decline

5.1 In summary the current basis for providing affordable housing in North East Lincolnshire needs a complete overhaul to take account of these pressures and ensure that higher market levels of housing growth contribute effectively to new methods of meeting housing need. This will be a challenging and lengthy task requiring new approaches both by the Registered Providers (Housing Associations), private landlords/investors and North East Lincolnshire Council. The main elements are:

i. A shift in policy to fit with Government objectives on home ownership. The Starter Homes policy is likely to be taken up by developers in at least some of the schemes in the profitable suburban fringe. If Starter Homes are included, the doubling of overall housing growth should enable over 100 new affordable homes per annum to be achieved by the end of the Plan period. In addition low cost home ownership can be promoted through schemes such as Rent to Buy, through “homesteading”/heavily discounted Right to Buy by Registered Providers in relation to stock they wish to dispose of and through supporting measures such as refurbishment grants, mortgage support etc;

ii. Action by Registered Providers to improve their viability, investment potential and market appeal so that they can undertake a more extensive programme, leading new developments to include a mix of sale, low cost home ownership and (cross) subsidised rental housing. Shoreline consider a key step to be disposal or demolition of low demand housing stock and stock which cannot be refurbished or repaired to an acceptable standard on a cost effective basis (for example the 650 unit Freeman St/Comber Place demolitions require expenditure of £6.5M but save £21M over 30 years). It will also require continuing efficiencies in operation to keep rent levels competitive and affordable. However low rents, no grant and high capital requirements will make new investment much more challenging than before in areas such as this;

iii. In the Inner Areas the most effective type of new housing investment project is likely
to be at small new community scale ie big enough to have its own identity and offer a sense of fresh start. The recent Freshney Green project, a £54M 193 home project in West Marsh by Linden Homes (Galliford Try) and Shoreline (a mix of 60% sale housing, 25% shared ownership and 15% social rent) shows that this can be achieved if done at the right scale. This scale of intervention is however, difficult to achieve. Efforts should still be made to assemble sites and identify opportunities for targeted regeneration. DevelopNEL (the wholly owned NELC subsidiary (Development Company)) is well placed to take on the land assembly role in this task. It is worth highlighting that one of the most promising Grimsby town centre regeneration sites – the Garth Lane/Alexandra Dock site with its potential for high quality mixed use development – would make an enormous contribution to extending better property values into the West Marsh area;

iv. In addition to the land assembly task, further public sector support and incentive will be needed to attract developers (including Registered Providers) to these inner sites. This would involve an investment and enabling approach by NELC which could contribute public infrastructure (eg a school) and site preparation costs to attract a developer. This may include using an appropriate mix of land acquisition powers, borrowing, New Homes Bonus and any s106 that may be achievable from the more buoyant market areas on the suburban/rural fringe. This could include planning incentives in the form of LDOs (in which NELC has a national lead as one of 4 pilot Las to adopt LDOs for housing) in addition to brownfield registers and similar measures;

v. A new entity will be needed to actively manage parts of the inner areas towards these objectives. This needs a new approach to the PRS by combining the current enforcement activities of NELC to tackle unacceptable landlord behaviour (including selective licensing where needed) together with incentives for good practice (including refurbishment grants) and a willingness by RP/NELC partners to acquire and manage property as part of the site acquisition programme;

6. Developing the programme of interventions

A promising start has been made in developing this new approach. Wider housing growth will generate additional resources for Affordable Housing and NELC is committed to maintaining flexibility in negotiating s106 contributions so that off site contributions can be used to support provision in locations where need is strong rather than where market development is strongest. NELC together with the Housing and Delivery Board and key local partners such as Shoreline Housing (which manages the transferred local authority housing stock) and other RPs are working to create a series of potential interventions including the following:

i. NELC has established a wholly owned subsidiary (known as DevelopNEL) which will take ownership of suitable surplus sites across the LA area with the major objective of boosting housing supply, including affordable housing. It has agreed in principle to target development sites in the Inner Areas and potentially could seek to assemble other ownerships to create a viable large development site. The Council is now well advanced
towards securing one or more private sector partners through the DevelopNEL and HCA/DPP process – success in completing this will be an early indication of its commitment in this area;

ii. A Grimsby Gateway partnership has been established to bring together the main partners with interests in the inner areas (East/West Marsh) to agree a potential programme of measures (including for example the Shoreline restructuring and discounted Right to Buy initiatives) and to seek support from the Government’s Estate Regeneration initiative sponsored by DCLG. This is a nationally competitive fund with an advisory panel chaired by Lord Heseltine, and a commitment of £140m loan funding so far. While this bid is still in its early stages an expression of interest for Grimsby has been submitted to DCLG and Registered Providers have indicated support in principle including the submission of indicative schemes for Shared Ownership or Rent to Buy;

iii. The NEL Strategic Advisory Group (which brings together local chief officers for education, health, police, fire and rescue and NELC) has given its in principle support to the Grimsby Gateway initiative and is looking to see how it can support specific initiatives in these areas to tackle the deprivation, safety and community aspects that need to be part of an effective housing approach;

iv. A community led local development strategy is being prepared under an EU funding (interreg/ESF) programme which will include a social housing project. While small scale in itself this will help raise community engagement and leadership which will be important components of success in the inner areas.

7. A trajectory for the plan period (to 2032)

7.1 As indicated above there will be a substantial growth in resources for Affordable Housing arising from the housing market growth proposals set out in the Plan and a significant part of this will be in the form of Low Cost Home Ownership including Starter Homes. Securing a continuing supply of affordable housing across the period of the plan is achievable if major steps are taken, and if the role of the Private Rented Sector as part of the solution is acknowledged. These steps won’t eliminate the backlog of affordable housing need in the next 5 years but a more varied, higher quality and better functioning local housing market should help significantly reduce future affordable housing need. In terms of the future affordable trajectory it looks prudent to project this in 3 x 5 year phases broadly as follows:

i. **Phase 1 2017 – 2021** New affordable housing provision (including Starter Homes) is likely to be mainly on the suburban/rural fringe or focus on special needs such as elderly or young persons' accommodation achieved through a mix of cross subsidy with a market led RP scheme and a limited s106 contribution. In the inner areas the period is likely to be mainly restructuring and a preparatory phase for creating new development opportunities at scale ie land assembly and management. Phase 1 of the large scale demolitions in the Shoreline programme will complete in late 2017, with Phase 2 to complete in 2020. Balancing this will be provision of Starter Homes and more resource for other LCHO initiatives. **Total newly built affordable housing as currently defined could increase up to 80 units per annum.**
ii. **Phase 2 2022-2027** Higher market growth will increase resources available for Affordable Housing. Significant new development should be achievable in the inner areas but initial financial support will be needed through a mix of cross subsidy within the scheme, s106 and borrowing via DevelopNEL. However this will enable a larger flow of affordable housing and a gradual reduction in subsidy from outside the scheme. Other new schemes or part schemes will continue in the suburban/rural fringe. **Total newly built affordable housing as currently defined could achieve levels of up to 120 units per annum**.

iii. **Phase 3 2028-2032** Large new community scale sites offering urban extensions are likely to deliver a significant contribution to Affordable Housing. There are clearly many uncertainties but if progress has been achieved through the earlier stages there should now be a self generating residential investment market in the inner areas. Large scale RP led schemes will not require external subsidy and DevelopNEL should achieve a return on deferred land receipts and borrowing which has supported the earlier phases. **Total newly built affordable housing as currently defined could achieve levels of up to 150 plus per annum**.

8. **Critical assumptions and dependencies**

8.1 The following underlying assumptions are critical and significant failure to achieve these would seriously undermine the level of delivery:

i. The most important assumption relates to continued strength of the local economy, and in attracting new investors to the area, all reflected in jobs growth and therefore new housing demand. Brexit and its potential impact on trade patterns and the ports business together with further changes in energy policy affecting, for example, future levels of activity at Drax, are a reminder that NELC given its geography is more dependent than most on its key business sectors. Equally important is the ability of the area to retain as residents those who work there (i.e the local offer in terms of services, leisure and attractiveness relative to other locations). This is improving but the delivery of the cinema and evening leisure package for Grimsby town centre is particularly critical;

ii. In terms of affordable housing delivery, the critical assumption is the emergence of and support for a new type of developer led model. As discussed above, this means the creation and delivery of further regeneration projects led by developers (RP or joint ventures), incentivised through a mix of NELC led (via DevelopNEL) land assembly with deferred receipts and subsidy either via HCA grant, New Homes Bonus or procuring a larger scale RP willing to cross subsidise the scheme from more profitable developments elsewhere in the region or beyond. The Council is now well advanced towards securing one or more private sector partners through the DevelopNEL and HCA/DPP process – success in completing this will be an early indication of its commitment;

iii. The attraction of new development to the Inner Areas will depend critically on effective large scale management of those areas by NELC through a Private Rented Sector intervention programme with the object of retaining the best and replacing the worst stock (through new development), strong PRS management and the delivery of improved community support and safety services. This is an essential precondition to achieving new
developer interest; without it low values and poor quality will deter investors.

8.2. The role of NELC A further critical assumption relates to the role of the Council, which is severely constrained in terms of financial resources and capacity. It is therefore rightly looking at ways to strengthen its housing policies by acting as an enabler and commissioning agent rather than managing directly. Nevertheless it is the ultimate guardian of the local public interest and it is critical for the success of the policies discussed in this statement that new arrangements address the following:

i. Relationships with major Registered Providers/Housing Associations – maintaining these relationships and attracting new ones will be key to improving affordable housing investment prospects and needs to be given higher priority;

ii. As focus has moved to procuring social housing and managing directly delivered housing services, the overview of the housing market (all tenures) has suffered and now needs to become a strategic priority. Achieving success in the Inner Areas alone requires an integrated approach and NELC needs to lead in seeing that get established;

iii. Given the resource pressures on the Council, ensuring that NELC policies are properly looked at in terms of their impact on housing (e.g., in decisions on grants, loans and council tax discounts on refurbishment of empty property) before decisions are taken;

iv. Big picture and strategy for the area – the Local Plan and Grimsby and Cleethorpes Towns Centre Investment Plan go some way to provide a framework for partners engaged with the major housing sites but in a number of areas there needs to be further strategic planning to provide context for potential housing site options. This should be tackled as part of the follow up to the Local Plan.

9. Conclusions As a housing market area North East Lincolnshire has many strengths despite (and because of) its comparative geographical isolation and its potential to grow the full range of housing products and tenures is good. However, to achieve this requires a number of very ambitious new and more strategic approaches to housing being adopted. The current position is that there is real interest in grasping the challenge, but whilst initial steps have been taken further and greater commitment will be required.
Annex 1 Terms of Reference and Statement contributors

Terms of Reference for supplementary Housing Statement - Review of Affordable Housing Provision to support the Local Plan North East Lincolnshire Council wishes to review, alongside submission of the draft Local Plan, how affordable and non market housing can be delivered in the NEL area taking account of the changing policy and financial context across the housing sector nationally. The long term need is to develop effective partnerships to deliver a range of housing products which are effective for the particular conditions of its area. Stage One of the Review may lead to a full Housing Strategy but the 2 stages are to be kept distinct.

Outline This will provide a position statement for use in supporting submission of the Local Plan which assesses current market conditions in the NEL area and the range of non market housing products which have good prospects of delivery in the future taking account of changes in the Housing and Planning Act 2016 and other relevant and forthcoming policy and financial changes affecting housing. This will be informed by a review of current partnerships in the NEL area with registered providers and other housing investors, so that the Council can prioritise its resources in supporting housing provision and delivery.

External Review and contributors to the statement The Review Statement has been prepared by the Chairman of the Housing and Development Board, Henry Cleary with input from the following:

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Annex II General Background

North East Lincolnshire, located at the mouth of the Humber Estuary (the UK’s Energy Estuary), is experiencing significant growth in its key business sectors. These include renewable energy and offshore support, ports and logistics, chemicals and seafood and food processing, building on its historic strengths in the ports of Grimsby and Immingham, together with a strengthening visitor economy exemplified in the role of Cleethorpes.

The housing and development sectors play a vital role in supporting the growth of the area and as employers in their own right. The economic recession had a significant impact on the sector, with new housing completions falling from a peak of 450 in 2006 to just 314 in 2009 as a result of restrictions on mortgage availability and on commercial lending to housebuilders. Completions are again rising supported by Government initiatives including the Help to Buy scheme (which provides equity loans or mortgage guarantees for buyers of new homes). These have helped the sector emerge from the recession and return to growth although much of the development in the area in recent years has been characterised by small local builders with few regional or national names.

The NEL Local Plan (currently at pre-submission stage) and the Council’s Economic Strategy highlights the need to achieve a step change in housing delivery and widen housing choice if NEL’s economic growth aspirations are to be realised. The Council’s pre-submission Local Plan proposes the allocation of land for 13,340 new homes over the period 2013 to 2032 – involving an effective doubling of current rates of housebuilding.

Among the measures being developed is making greater use of public land and other Council assets. This would allow the Council to accelerate housing delivery on land suitable for residential development in its ownership and/or as part of an integrated approach to the development of other public sector-owned land in NEL. In 2015, the Council’s Cabinet approved the establishment of a wholly-owned development company – Develop NEL Ltd – to support the delivery of the Council’s housing and regeneration objectives.

Develop NEL will seek to develop surplus Council-owned land assets and/or address market failure by unlocking the development of stalled sites. It will be able to enter into joint venture or other partnership arrangements with the private sector to leverage private investment and, where appropriate, to enter into borrowing to purchase land or other assets. The first package of sites is expected to be brought to the market in the near future.

Whilst housing affordability is less challenging in NEL than in other areas of the Humber/Greater Lincolnshire, a significant number of NEL residents remain unable to afford outright owner-occupation or do not wish to enter the private rented sector. Rental levels for private and social rented housing are broadly comparable but there are significant quality and condition issues.

The ongoing need for social housing is reflected in the extensive housing waiting lists operated by the Council/Shoreline Housing Partnership (Shoreline is the RP which manages (via LSVT) the former Council housing stock). The Strategic Housing Market Assessment prepared for the Council in 2013 as part of the Local Plan evidence base identified a requirement to provide for over 2,900 affordable homes over the first 5 years of the Plan to meet the backlog of housing need and meet future requirements, including for key workers.

The Government has an increasing focus on the delivery of ‘starter homes’ to promote
affordable owner-occupation. Funding for social rented accommodation is particularly constrained in the current climate. In recent years, the Council has been able to secure modest affordable housing provision through developer contributions under section 106 of the 1990 Town and Country Planning Act, although this has been limited by low housing completion levels. The Housing and Planning Act is likely to severely limit the potential in the future given its provisions on Starter Homes.

The Housing and Development Board has been established to bring together the key private and public sector stakeholders in this sector, including the housebuilders most active in the local market. The H and D Board has helped to make the case for streamlining planning and developed proposals on a series of housing initiatives particularly in the case of the Inner Areas and Grimsby Gateway.