

Session 5

Respondent number: 1045 / 1325

Housing

STATEMENT OF CASE

BARTON WILLMORE
ON BEHALF OF

SUTHERLAND HOMES
AND COLTISHALL GROUP

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SUMMARY OF OBJECTION

This statement refers to three policy objections.

Policy SS3

Housing Supply

Policy SS3 currently states that at least 8,000 dwellings should be built between 2001 and 2021 in accordance with the East of England Plan. This policy should be amended to follow the approach set out in Policy H1 of the RSS Panel Report. More sites than the minimum 8000 units should be identified. Reference to development being dependant on the infrastructure should be deleted from SS3.

Windfalls

PPS3, paragraph 54, states that allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. This evidence has not been shown in the Core Strategy. Policy SS3 should not rely on windfall sites.

Policy HO1

Housing Supply

North Norfolk District Council cannot adequately prove a five year supply of housing within the District.

Dwelling Type and Mix

The Core Strategy does not adequately deal with C2 accommodation for the elderly and should consequently include a specific policy relating to this need.

Policy HO7

Density

Policy HO7 should be amended so the density provision is more flexible. We believe that it is not necessary to differentiate the densities for main settlements compared to service centres.

Policy SS3

RSS Housing Supply Requirements

- 1.1 Policy SS3 states that at least 8,000 dwellings will be built between 2001-2021 in accordance with the East of England Plan. These dwellings will be built in locations which accord with the Spatial Strategy having regard to the needs of each location and their capacity to support additional development.

CS Requirement 2001 -2021	8,000
Completions 2001 -2007	2,062
Residual (2007 -2021)	5,938
Yearly rate (2,062/6)	344
344 x 14	4816
Shortfall	1122

- 1.2 The table above includes updated information from document F18 – Statement of five year supply of Housing Land September 2007. The table shows that if the District performs at the current build rate of 344/yr, only 6878 dwellings will be completed, leaving a shortfall of 1122 by 2021. The housing trajectory shows an increasing level of completions. However, the timescale for the preparation and release of Site Allocations combined with the infrastructure constraints to release of development will make it difficult for the uplift in completions to be achieved.

Housing Contingency

- 1.3 The housing requirement is expressed as a minimum. There are two contingency approaches that will ensure that the minimum can be achieved. One approach is to allow for the 15 year requirement from adoption and the second, interprets Policy H1 of the RSS.
- 1.4 It is not anticipated that the LDF will be adopted until 2010, therefore the plan period will already be well behind schedule and should run until 2026. PPS3 states that the Plan, as well as a continuous delivery of housing provision, should run for 15 years from the point of adoption. Assuming the Plan is adopted by 2010, this means it should run for an additional five years until 2025/26. The table below demonstrates the need to identify sites for 8058 dwellings at April 2007.

CS requirement (2001-2021)	8,000
Completions (2001-2007)	2,062
Residual (2007 – 2021)	5,938
Revised yearly rate	424.1
2007 -2026 (424 x 19)	8058

- 1.5 The second contingency approach is described in Policy H1 of the RSS. H1 states “they should aim to exceed the annual average rates for 2006 – 2021 if more housing can be delivered without breaching environmental and infrastructure constraints, by :-
- Increasing density, consistent with criteria in PPS3,
 - Encouraging opportunities on suitable previously developed sites,
 - Making best use of Policies on exception sites to provide affordable housing in rural areas.

The Council (table to SS3) has made an assumption of minimum and maximum housing densities for further proposed sites. The Council should base it’s supply on the minimum density and treat the maximum density as an extra housing provision to accord with the above approach. This would mean total built at April 2007 of 2062 added to commitment of April 2007 of 1512 added to the minimum housing provision of 2700, excluding Windfalls, equals 6274. Therefore further sites, rather than just additional density, for 1726 should be identified or 8000 plus 1726 equals 9726 in total.

Windfall

- 1.6 POLICY SS3 implies development should be dependant on infrastructure being established in advanced. A similar approach was rejected by the RSS panel. This sentence should be deleted or replaced with ‘development will bring forward the necessary infrastructure’.
- 1.7 During the first 6 years of the plan period, dwelling completion rates in North Norfolk have entirely comprised windfall developments (the North Norfolk Local Plan includes no residential allocations). The total windfall completions expected between 2001 – 2021 is 2514. This figure represents over 25% of the total projected completions. The Council are now requested under PPS3 to identify sites for development and not to rely on Windfall. Therefore the penultimate column of SS3 table titled Windfall estimate should be excluded.

Policy HO1 Housing Supply

Central Government Guidance

- 2.1 PPS3 as a principal aim seeks to achieve a step change in housing supply (paragraph 2) and to achieve a flexible and responsive supply of land (paragraph 54). Local Planning Authorities are also advised to identify a further supply of developable sites for 6-10 years and where possible for 11-15 years (paragraph 55) and to illustrate this on a housing trajectory.

East of England Regional Plan (RSS14)

- 2.2 The Panel has recommended that the housing provision in North Norfolk District be increased to at least 8,000 dwellings for the period 2001-2021.

Housing Land Supply in North Norfolk District

- 2.3 We are concerned that current housing supply in North Norfolk is falling short of requirements at the present time. It is proposed that a current shortfall in the 5-year and 10-year supply could be met by the release of sites on the urban periphery of urban areas, such as Cromer. In terms of a 10 year supply and meeting the criteria set out in PPS3 for 15 year deliverable sites, larger strategic sites such as RAF Coltishall should be identified.

Delivering Housing Supply in the Current Plan Period

- 2.4 During the first 6 years of the plan period, dwelling completion rates in North Norfolk have entirely comprised windfall developments (the North Norfolk Local Plan includes no residential allocations) and have been below the annual average requirement. It is clear therefore that completion rates will have to increase in the remaining 14 years of the Plan if the desired minimum target of 8,000 dwelling requirement is met. With no allocated sites available, we believe there will be a substantial backlog of housing need accumulated by the time the LDF is put in place. By the time specific sites are released when DPD's are adopted in 2009/10, there will only be 10 years of the plan period remaining.
- 2.5 It is unlikely that the Core Strategy will be adopted and strategic sites released until 2009/10. At adoption there should be an identified 15-year supply according to PPS3

and PPS12 guidance. Therefore, it is best to plan for new growth up to 2026, which would require an additional 5-year supply of sites.

	<u>Dwellings</u>
Residual Rate post 2007	424
Residual requirement 2007-2021	5,938
5-year supply at residual rate 2021-2026	<u>2,120</u>
Total identified supply 2007-2026	8,058

- 2.6 Even if the LDF is adopted in 2008, there will be some considerable delay before housing can be delivered on the sites identified for housing development. The long lead-in periods for the new housing allocations to come on stream will mean that provision during the period between 2007 and 2012 will depend largely on windfall sites coming forward for planning permission and development. The evidence from housing monitoring is that completions arising from windfall sites have made up all of the housing development in the Plan period so far. However, this cannot be relied on into the future as the availability of these sites will fall leading to diminishing annual completions rates and a failure to deliver the backlog.

Future Supply - Commitments (as at 1st April 2007)

- 2.7 The future supply of housing provision in North Norfolk assuming a base date of 1st April 2007 is dependent upon existing commitments from sites with and without planning permission. The annual monitoring information for the period to end 2006 indicates commitments with planning permission of 1,519 dwellings and a further 337 dwellings without planning permission (Urban Housing Capacity Study 2005, Pre-app discussion or current application). This is equivalent to total supply of 1,979 dwellings, which is just less than the five year requirement of 2,120 (4.7 years)

Past and Projected Build Rates

- 2.8 Past completion rates for the period 2001-2007 indicate an average of 344 dwelling completions per annum, therefore a projected 5-year provision of 1,720 dwellings at this annual rate would result in a projected shortfall of 400 dwellings using the figure recommended by the Panel (i.e. 2,120 minus 1,720).

Large Sites Assessment

- 2.9 Our review of the North Norfolk large sites trajectory is based on development timescale assumptions within **Appendix 1** of this statement. We have adopted a trajectory format that only examined large sites of over 25 dwellings. Projections for sites below 25 dwellings have not been examined.
- 2.10 Our projections for the sites referred to are based on site specific constraints, knowledge of the study area and realistic timescales for sites coming forward for development (**Appendix 1**).
- 2.11 On the whole we agree with the trajectories made by the Council, however, there is some evidence to suggest that the Council have front loaded their projections quoted within document F18. Primarily, this is because the projections do not meet realistic timescales for sites coming forward. Our main concern is that a number of sites are only at pre-application discussion stage and we do not anticipate they will be completed within the next five years. These sites are as follows:

Grove Road, Melton Constable - 43 dwellings proposed

Funded rural exception sites - 50 dwellings proposed

- 2.12 We are also concerned that proposal sites where planning applications are still being determined are included within the five year supply. These sites may not be granted planning permission and even if they are, the lead in time until the dwellings are completed is likely to be beyond the five year period. These sites are as follows:

Anglia Water – 42 dwelling proposed

Edinburgh Road – 33 dwellings proposed

- 2.13 The total of the four sites is 168. By deducting these sites from the total supply (1,979) the actual supply of housing over the next five years is 1811. This equates to an under supply of 309 dwellings within the five year period as opposed to the 141 shortage envisaged. In supply terms this represents a 4.4 years.

Policy HO1 Dwelling Type and Mix

- 2.14 Policy HO1 states that unless it is demonstrated that a proposal will address a specific local need for specific accommodation, all new housing development shall contribute at

least 20% of dwellings that are suitable or easily adaptable for elderly accommodation. This policy needs to be more flexible as certain locations will not be appropriate for housing elderly or disabled people who need flat sites.

- 2.15 Whilst we accept that the theory of mixed and balanced communities will lead to sustainable communities, we believe this will be hard to implement on all sites. By and large North Norfolk does not have large developable sites and consequently 20% is not considered achievable in many locations. There does not appear to be any evidence base for the 20% figure and we would welcome clarification on how this figure was formed.
- 2.16 The Core Strategy does not adequately deal with C2 accommodation primarily nursing homes for the elderly and should consequently include a specific housing policy relating to this need.

Policy HO7 Density

- 3.1 Policy HO7 (Making the most efficient use of land), states that proposals for residential development will be permitted provided that the development optimises the density of the site in a manner that protects or enhances the character of the area. The Council will aim to achieve the following minimum densities: In Principal and Secondary Settlements the density is not less than 40 dwellings per hectare.
- 3.2 Para 47 of PPS3 notes that a density of 30 dwellings per hectare constitutes a national indicative minimum to guide policy development and decision making until local policies are in place. The wording of Policy HO7 is therefore inconsistent by stating that the nature of a development responds to its surroundings, whilst also stating it aims to impose a minimum density which in some circumstances, would be unsuitable within the context of the site concerned.
- 3.3 Some sites require lower densities on the edge of urban areas, or in locations where the existing character is low density and it would be completely inappropriate to enforce higher densities. Taking into consideration the fact most new developments will be on edge of town locations and also considering experience within the Norfolk, setting, 40 dwelling per hectare, is considered unnecessary. There will always be cases where character may dictate that higher densities are not appropriate, even within Principal and Secondary Settlements or more appropriate in service centres. It seems unnecessary to make the density distinction between these settlements and the national guidance on density is appropriate.

Appendix 1 - Basis of Assumptions and Stage by Stage Breakdown

Stage	Time Scale	Time Line
1. Preparation of Outline Planning Application, including draft Section 106 negotiations, Section 278 Agreements and Environmental Statement.	8 months	8 months
2. Outline Planning Application submitted, assessed and determined.	3 – 4 months	12 months
3. Outline Planning Application Approved. Marketing of site commences while Infrastructure Application prepared.	3 – 4 months.	16 months
4. Infrastructure Application submitted, assessed and determined.	3 months	19 months
5. Infrastructure Application approved. Reserved Matters application prepared, submitted and determined.	3 months	22 months
6. Reserved Matters Application approved. Service Diversions instigated and completed.	6 – 12 months	31 months
7. Commence and complete major off-site infrastructure provision.	6 – 12 months	40 months
8. Commence on site infrastructure, flood protection measures, decontamination etc.	12 months	52 months
9. Commence building	---	-----
10. First 25 dwelling completions (Based on a single house builder)	1 year	64 months
11. Subsequent dwelling completions @ rate of 50 dwellings per annum (Based on a single house builder)	1 year	Up to 76 months