

Scale of Housing Provision

1. A fundamental part of the vision of the North Norfolk Core Strategy (NNCS) is to facilitate growth in homes and jobs in North Norfolk in accordance with National and Regional Policy. The importance of this is emphasised in PPS3: Housing (2006), which states (para. 2) that its principle aim is to *“underpin the Government’s response to the Barker Review of Housing Supply and the necessary step-change in housing delivery through a new, more responsive approach to land supply at the local level”*, and sets out the (para. 3) Government’s commitment to *“improving the affordability and supply of housing in all communities”*.
2. The recent Housing Green Paper (2007) sets out a vision (page 6) where everybody *“has access to a decent home at a price they can afford, in a place where they want to live and work”*. Moreover, the Planning White Paper (2007) states (page 12) that *“it is imperative that we support housing growth so that peoples aspirations for good quality, affordable housing can be met”*.
3. The NNCS’s intention to facilitate the step change in house building rates in North Norfolk is, therefore, very much welcomed by Trinity College Cambridge (TCC), and the scale of housing provision proposed in North Norfolk over the plan period is generally supported. The policy requires the provision of 8,000 dwellings as a minimum, and identifies potential provision of up to 9,488 dwellings to be built between 2001 and 2021.
4. Policy H1 of the RSS identifies a development requirement of 8,000 new dwellings in North Norfolk in the period 2001 to 2021. It highlights that 1,610 dwellings had been constructed in the period to 2006 (320dpa) and, therefore, that there is a residual requirement for the construction of 6,390 dwellings (430dpa). The policy specifically confirms that this is a minimum requirement, and that local planning authorities should seek as soon as possible to exceed the annual average rates and make up any shortfall. Moreover, they should aim to exceed the annual average rates if more housing can be delivered without breaching environmental limits and infrastructure constraints. The policy imperative to deliver a step change in the supply of housing in accordance with national policy outlined above is very clear.

5. The proposed scale of provision in NNCS Policy H1 is, therefore, considered to accord with the provisions of National Policy and the RSS, and is generally sufficiently flexible in terms of being responsive to the District's local needs.

Use of Windfall Allowances

6. Notwithstanding the overall scale of housing provision anticipated over the plan period, it is noted that the estimate of windfall contributions has been applied from 2011. Paragraph 59 of PPS3 states that an allowance for windfall development should not be included in the first 10 years of land supply post adoption (i.e. to 2018 assuming the Core Strategy is adopted in 2008), unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified.
7. The scale of windfall provision indicated in Policy SS3 is 2,514 dwellings. That is 31% of the total RSS requirement for the District or 27% of the total provision identified in the NNCS. A sizeable proportion in either case. In terms of the residual requirement identified in the RSS, it would represent 40% of the provision, and in terms of the residual requirement in the NNCS it represents 43%.
8. There is, therefore, an over reliance on windfall provision in the housing land supply set out in Policy SS3. That is contrary to national policy and will not help the NNCS Core Strategy meet its own Core Aims. Failure to address this issue would mean that housing provision is insufficient to meet demonstrable needs confirmed in RSS would be contrary to one of the Government's principal planning ambitions (as stated in PPS3 para 9) to ensure a better balance of housing supply and demand, and would exacerbate many of the current housing problems experienced in the District (i.e. inflated house prices, increased demand for social housing etc).
9. The Housing Background Paper makes no attempt to justify the inclusion of a windfall allowance having regard to the approach identified in PPS3 paragraph 59. Instead, it simply states (para 2.10) that continued high levels of windfall development can be expected, presumably on the basis of the historic contribution such developments have made. That is clearly the case across the region, and indeed the country, and as such is in no way a particular circumstance that justifies a departure from National Policy. It, therefore, fails soundness test 4.
10. Indeed, it goes to the heart of why PPS3 was couched in such terms in the first place. The Housing Green Paper highlights the issue (para. 18), simply stating that the principal way to quicken the supply of housing is to provide more land. It continues

“For too long, too many local authorities have relied on speculative windfall development to deliver housing. We have seen the effects of the failure to plan positively in some of urban areas, where unplanned, unpopular development has become an unwelcome phenomenon.” Clearly the Government is seeking certainty in the housing land supply, and that is the central theme of the emerging policy documents. A reliance on windfall patently does not provide that certainty. Whilst there might be historic evidence available, the supply of windfall sites is ultimately finite, and there is no guarantee that past trends can be maintained in the future and, therefore, the NNCS should seek to facilitate the allocation of deliverable sites in accordance with PPS3.

11. Once the windfall provision is appropriately reduced there is an apparent need to increase the amount of land to be allocated for development in Policy SS3 and underlying Local Development Documents. This will also help to ensure the provision of the supporting community infrastructure, and affordable housing that the NNCS seeks.

Development Post 2021

12. Moreover, PPS3 (para 53) requires the broad locations or specific sites for development to be identified sufficient land to enable continuous delivery of housing for 15 years from the date of adoption taking account of the level of provision set in the RSS. The RSS itself stated in Policy H1 that to plan for at least 15 years from the date of adoption, the first round of local development documents should make the assumption that the annual average rate of provision identified in the policy will continue post 2021.
13. As the NNCS is not expected to be adopted until 2008, the requirement for a sufficient supply of housing land extends beyond the plan period to 2023, i.e. the plan period is too short. Indeed, it is inevitable that housing and economic growth within North Norfolk will continue beyond plan period to 2021. This is clear from the recent Government’s announcements associated with the Housing Green Paper and announcements on housing provision. Furthermore, it is not unusual for a Development Plan to provide a context for growth beyond the end date of the plan, especially for major schemes.
14. This would provide a more specific and certain planning policy context for infrastructure providers and developers to confidently and properly plan for the new services and other facilities required to meet the full growth required at the outset, particularly at the

Principal Towns. It would help to ensure that there are no impediments to the delivery of the required housing and other land uses, avoiding the problems and delays that many major development schemes are currently experiencing around the country. Indeed where the required infrastructure can be provided and environmental capacity is not breached there is no reason why planning permission should not be granted. Both planning and enabling development post 2021 is consistent with the Housing Green Paper that has an overriding policy imperative of housing growth through long term infrastructure planning.

15. There is, therefore, significant policy support to justify the allocation of the full development of the major sustainable urban extensions in the underlying Site Allocation Development Plan Documents, and allow subsequent (potentially phased) permissions to be granted to meet post 2021 needs to ensure a 15 year land supply. Otherwise the NNCS would fail soundness test 7.
16. It is, therefore, recommended that this is acknowledged in Policy SS3, and sufficient additional provision made in the NNCS to meet this requirement by emphasising the potential of major sustainable urban extensions to continue to grow and accommodate needs beyond 2021.

Phasing

17. Policy SS3 states that development should not occur until appropriate infrastructure is available. Whilst the basis of this part of the policy is understood, in light of the Government's policy imperative to deliver a step change in the supply of housing, and in doing so ensure a better balance of housing supply and demand, which is also reflected in RSS Policy H1, the NNCS needs to be more explicit and constructive in terms of how infrastructure should come forward to facilitate development, and ensure a 5, 10 and 15 year land supply.
18. It is apparent that at the present time there may be limited infrastructure capacity in the district, notably sewerage treatment facilities. However it is for the Council and the service providers, as well as the private sector, to take a pro-active approach to identify requirements and facilitate their provision. The NNCS should reflect this to ensure that the ability to provide 8,000 dwellings and employment development during the plan period is not prejudiced. This issue is dealt with in greater detail in other representations submitted on behalf of TCC.

Distribution of Housing Allocations

19. TCC are also concerned with the distribution of housing in the District over the plan period, as set out in the table in Policy SS3.
20. Whilst Policy SS1 states that a small amount of development will be focused on the Service Villages, when the provisions of Policy SS3 are examined in more detail, it is apparent that in reality, a very significant amount of development will be focussed into these locations. It states that between 300 and 450 dwellings will be allocated in Service Villages. It also indicates that in the villages of Briston/Melton Constable and Mundesley, developments of up to 50 dwellings may be acceptable. When added to the substantial windfall estimate in these locations (1,399 dwellings) and remaining commitments (644) it is apparent that development in these locations will provide approximately a third of the total future dwelling numbers in the District.
21. Whilst the allocation of development to meet local needs in the service villages is not objected to per se, these are less sustainable locations as access to services, facilities, employment opportunities and public transport is relatively limited compared to the principal settlements, and the proposed overall scale of development should reflect that. Indeed the Settlement Planning for North Norfolk Report which informed the preparation of the NNCS concluded (para 4.19) that the service villages have an essential strategic function as dormitories, and as such they were not recommended as sustainable locations for development other than to meet existing local needs.
22. The current level of proposed provision in these locations is clearly out of kilter with national and regional policy, and the strategy set out in Policy SS1, where the intention is to focus strategic new development into the Principal Settlements to maximise access to existing employment and education opportunities and to retail, leisure and community facilities. Moreover, it is the provision of significant sustainable urban extensions in these locations that will optimise the provision of affordable housing and community infrastructure provision. These objectives would clearly be compromised by the disparity in the actual development distribution as set out in Policy SS3 and the intent set out in Policy SS1. In this respect the NNCS fails soundness tests 4 and 7.
23. Notwithstanding that, it is noted that the number of allocations proposed in the Principal Settlements of Cromer and North Walsham and the service villages has increased since the preferred options stage. Whilst the actual increase in allocations, in terms of dwelling numbers, is relatively modest, representations to the earlier Site Specific Proposals Preferred Options Consultation highlighted that the appropriateness and

deliverability of a number of the sites that were being promoted as potential development allocations was very questionable. There are significant development constraints in some of the principal and secondary settlements, notably Cromer, Holt and Sheringham, and inevitably in the service villages. For example land around Cromer and Sheringham lies within a designated Area of Outstanding Natural Beauty. Other sites to be considered for housing are likely to be in employment use or to rely on the relocation of existing uses (on the basis of sites identified in the earlier Site Specific Proposals Preferred Options Consultation).

24. There is, therefore, no evidence to suggest that this anticipated amount of housing can be delivered in those locations. That is contrary to the provisions of PPS3 that emphasises deliverability. Unless that is remedied the housing provision will be insufficient to meet demonstrable needs confirmed in the RSS, and that would be contrary to one of the Government's principal planning ambitions (as stated in PPS3) to deliver a step change in the supply of housing, and in doing so ensure a better balance of housing supply and demand, widen opportunities for home ownership, ensure a choice of high quality housing, improve affordability, and ultimately create sustainable, inclusive and mixed communities.
25. The land north of Fakenham has considerably greater capacity to accommodate more than the 800 dwellings and 7ha of employment currently allocated to it (Policy SS8), yet the scale of allocations in Fakenham has remained the same. In light of the objectives and criteria outlined above, it is clear that a more sustainable approach to the distribution of housing in the District would be to focus a greater amount of development in the major urban extension north of Fakenham as this location is better placed than the other locations highlighted above to accommodate new development.
26. As an absolute minimum, there should be an explicit recognition in the NNCS that if the scale of development anticipated in the other settlements cannot be proven to be delivered at the site allocating stage, then the residual development requirement should be directed to the land north of Fakenham.

Conclusion and Recommendations

27. Whilst the overall housing strategy within the NNCS is supported and considered generally sound, it is apparent that it relies too heavily on windfall provision as a source of housing land. The uncertainty associated with will ultimately hinder the realisation of the development requirements for North Norfolk contrary to national, regional and sub regional planning policies. That situation would exacerbate the already acute issues of

housing opportunity, choice and affordability. This can only be remedied by allocating more land in the Principal Settlements to meet the identified needs. The scale of allocation should also take account of the need to ensure a 15 year supply.

28. In doing so the proposed distribution of development should be reconsidered to focus the growth on the Principal Settlements. Currently too much development is directed to the Service Villages, which has not been proven to be appropriate or deliverable, and that will dilute the sustainability and community benefits that will arise from the proposed development in the District.
29. In light of the objectives and criteria outlined above, it is clear that a more sustainable approach to the distribution of housing in the District would be to focus a greater amount of development into the major urban extension to the north of Fakenham. That area has capacity to accommodate much more than the 800 dwellings and 7ha of employment currently allocated to it in Policy SS8 (up to approximately 1,400 dwellings at 40dph).
30. Furthermore, given the Government's policy imperative to increase the supply of housing as soon as possible, the strategy policies should be revised to create a positive policy context that seeks to facilitate the development, and provide the certainty required to ensure that the necessary infrastructure provision is planned and procured expeditiously.

POLICY HO1

31. Policy HO1 which seeks to dictate the dwelling mix and type in future developments is too prescriptive, and would not allow development proposals to fully respond to changing needs and demands over the extent of the plan period.
32. Moreover, the required mix might not be appropriate for certain allocated sites. A high proportion of 1 and 2 bed units may be right for an urban site, but is less likely to be appropriate for large scale developments; such as the urban extension north of Fakenham where the provision of family accommodation is important to ensure the development of a balanced and sustainable community.

Recommendation:

33. Incorporate greater flexibility into Policy HO1 to allow developments to appropriately respond to their context.

POLICY HO2

34. The intention to maximise the provision of affordable housing in the District is understood, but the percentage of new housing sought to be affordable (on sites of 10 units or more) should be a target that reflects the Housing Need Assessment (i.e. 40-50%) rather than a minimum requirement (45%) as currently implied by Policy HO2. This approach is supported in PPS3 (para 29). It should also be borne in mind that emerging RSS considers that, across the region, a minimum of 35% of new housing should be affordable (Policy H3).
35. TCC also object to the requirement that majority of affordable housing should be social rented. National planning policy, notably PPS3 recognises the value of alternative forms of affordable housing and Policy H02 should reflect this. Furthermore the plan period extends to 2021, and it is unduly restrictive to prescribe the nature of affordable housing at this time. The policy should, therefore, be reworded to include sufficient flexibility to meet changing affordable housing requirements in North Norfolk in the future.

Recommendation:

36. Revise policy to reflect the above.

POLICY HO7

37. There appears to be a degree of inconsistency in respect of the objectives of Policy HO7 relating to the appropriate density of future developments. The first part of the policy emphasises the importance of protecting or enhancing the character of areas. That is accepted, as there are a number of locations in the District where housing may be acceptable in principle, but where they should be developed at a relatively lower density in order to ensure that the existing character of the surrounding area is not harmed. This approach is reflected in PPS3.
38. However the policy then goes on to state that a minimum of 40 dwellings per hectare in larger settlements is being sought. Whilst there are undoubtedly locations in the District where such densities are appropriate and achievable, there are areas where new development in excess of 40 dwellings per hectare would be out of context with the character of the surrounding environment.

39. Therefore, whilst the intention to make efficient use of land is recognised, the policy is clearly too prescriptive. Moreover, the 40dph figure is an arbitrary figure that exceeds national standards without clear justification.

Recommendation

40. Revise policy to reflect the above.