



Taylor Wimpey Developments Ltd / 1003 / Reps 4054, 4057 & 4085 /
Housing / Tests 4 & 7
Tuesday 11th December 2007

SUBMISSION STATEMENT
North Norfolk District Council Core Strategy Examination in Public

Submission on behalf of Taylor Wimpey Developments Ltd
Taylor Wimpey Developments Ltd / 1003 / Reps 4054, 4057 & 4085 /
Housing / Tests 4 & 7
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Prepared by
DLP Planning Ltd

October 2007



1. INTRODUCTION

- 1.1 This Report had been prepared by DLP Planning Ltd on behalf of Taylor Wimpey (formerly Taylor Woodrow) Ltd following the submission of representations to the various stages of the North Norfolk District Council Core Strategy Development Plan Document production process. This document expands upon the representations submitted under reference Taylor Woodrow Developments Ltd / 1003 / Reps 4054, 4057 & 4085.

- 1.2 Our representations upon the Submission Draft of the North Norfolk Core Strategy DPD are made in the context of promoting land to the east and west of Yarmouth Road, North Walsham, located to the south of the existing settlement to provide for a sustainable residential extension to the town.

2. REPRESENTATION

2.1 Our representations are objections to paragraphs 2.4.4, 2.5.3 and Policy SS3 of the submitted North Norfolk Core Spatial Strategy on the basis of soundness tests 4 and 7 of PPS12 paragraph 4.24. Our representations stated:-

- *Paragraph 2.4.4 - Para 59 of PPS3 is clear that allowing for windfall development in the first 10 years of land supply should not occur unless the LPA can provide robust evidence of genuine local circumstances that prevent specific sites being identified. It is implied in para 2.4.4 of the Core Strategy, that the LPA must restrict windfall development to be able to plan for the allocation of sites to meet the RSS14 requirement in the next 10 years of the plan period. This is largely irrelevant; PPS3 requires that the provision set out in RSS14 is planned for by way of allocation, notwithstanding what additional residential development may occur by way of windfall (rep 4054).*

- *Paragraph 2.5.3 - Firstly, the Core Strategy should be aiming to ensure that at the point of adoption of an allocations DPD, at least 15 years provision of housing is identified. Consequently, we consider that the Core Strategy should presume a continuation of RSS14 requirements beyond 2021 to 2026 and plan accordingly. Secondly, whatever may be anticipated in terms of windfall, PPS3 explicitly states that for the first 10 years of supply it cannot form a part of the planned provision except where the LPA can clearly demonstrate that it is unable to identify sites to meet the requirement. Finally, the Council's five year supply of housing calculation cannot rely on continued windfall development as this would not meet the criteria set out in para 54 of PPS3 (rep 4057).*

- *Policy SS3 – Firstly, the Core Strategy should be aiming to ensure that at the point of adoption of an allocations DPD, at least 15 years provision of housing is identified. Consequently, we consider that the Core Strategy should presume a continuation of RSS14 requirements beyond 2021 to 2026 and plan for housing accordingly. Secondly, the table in Policy SS3 includes provision of a windfall allowance. It is clear from guidance in PPS3, paragraph 59, that no allowance should be made for windfall in the first 10 years of the plan period, in this instance 2008 – 2018. This should be stripped out from the calculation and any shortfall on requirement should then be met through a commitment to the identification of specific allocations. Finally, it should be noted that such an approach is likely to lead to a much more certain outcome over the provision of affordable housing. The Council indicates in Policy SS3 that overall some 30% of housing provision will be affordable. However, in acknowledging the difficulty in securing affordable housing from smaller ‘fall in’ sites and to secure a ‘meaningful’ supply the inevitable consequence is that the Council will be endeavouring to seek from 45% to 50% affordable housing from the allocated sites. Setting aside any concerns this may have for affordability generally by reducing the available supply of market housing (paragraph 9 of PPS3) and viability in the light of other infrastructure / S106 requirements that development may have to meet, it is plain that by reducing planned reliance on windfall in meeting RSS14 requirements, then a more equitable level of affordable housing provision may be sought from allocated sites which will consequently lead to greater certainty in meeting the 30% target figure.*

3. SUBMISSION

- 3.1 Our submissions are straightforward. The basis on which the Council has arrived at the housing provision proposed in Policy SS3 of the submitted Core Strategy, does not conform to PPS3 guidance nor emerging RSS14 guidance.
- 3.2 Paragraph 53 of PPS3 indicates that local planning authorities should identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption. The site specific allocations document, which will serve to identify those site and broad locations for development, is unlikely to be adopted before 2009/2010 and consequently it will not meet the requirements of PPS3 guidance. To reflect the emerging guidance in RSS14 Policy H1, the plan period for the Core Strategy should be extended to 2006 on the assumption that as it should *'plan for continuous delivery of housing 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 during the early years after 2021 will be the same as for 2006 to 2021'*.
- 3.3 Paragraph 59 of PPS3 indicates 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 sites being identified. There is no suggestion that this is not the case at North Norfolk. Policy SS3 includes a provision for windfall for the 10 year period 2011-2021. This does not accord with PPS3 guidance. If the plan period is to 2021, a windfall allowance may only be included for the period 2017-2021. If the plan period is to 2026, as we say it should be, a windfall allowance may only be included for the period 2017-2026. Almost as an aside, mindful that all completions in the period 1997-2007 were technically windfall, the adopted Local Plan made no housing allocations, then the Council's windfall assumption for the purposes of the Core Strategy and

Policy SS3 in particular, i.e. half the historic rate of completions 1997-2007, do not appear to us as unreasonable.

3.4 In this context, we consider that the following calculation of housing land requirement is the basis on which the Council should be planning to identify land for new housing.

(a) Housing Requirement 2001-2026 (8000/20 X 25)	10,000 net additional dwellings
(b) Completions 2001-2007 (Policy SS3)	2,062 dwellings
(c) Commitments (Policy SS3)	3,574 dwellings
(d) Residual Requirement ((a) – (b) + (c))	4,364 dwellings
(e) 10% Lapse Rate ((d)/100 X 10)	436 dwellings
(f) Total Housing Requirement ((d) + (e))	4,800 dwellings
(g) Less Windfall Allowance (Policy SS3 24 dwellings p.a. 2017-2026)	216
(h) Housing Provision to be made in Policy SS3 ((f) – (g))	4,584 dwellings

4. CONCLUSIONS

4.1 Policy SS3 of the submitted Core Strategy does not accord with Government guidance as published in PPS3 nor the emerging RSS14 Policy H1. On this basis alone the Core Strategy must be considered unsound against Test 4 of PPS12 paragraph 4.24

4.2 Policy SS3 is also, in our view, unsound, when judged against Test 7 of PPS12 paragraph 4.24 in that the strategy for housing provision is unduly reliant on windfall housing provision, with consequent uncertainties over securing affordable housing provision.

4.3 In our view, the submitted Core Strategy must be modified to ensure:

- Planned provision of housing for at least 15 years from the assumed point of adoption of the site specific allocations DPD;
- To reflect Government guidance with regard to reliance on windfall provision in the calculation of housing land supply;
- To set a target for the allocation of land in the site specific allocations DPD to provide a net additional 4,600 dwellings.



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