

Matter Number: 2
Representor Ref: 8607

Greater Norwich Development Partnership Joint Core Strategy Examination

Matter 2 General Housing

Written Statement on behalf of
Welbeck Strategic Land Ltd

GENERAL HOUSING

A Is the JCS's planned provision of housing land to 2026 justified, effective and consistent with national policy, including the recent changes to PPS3 Housing with regard to the status of garden land and the deletion of a national indicative minimum density?

1.1 There are a number of issues that arise in considering the response to this matter:

- Whether the level of housing planned to 2026 is appropriate;
- Whether the level of housing, on an annual basis, is robust and acceptable (is supply backloaded);
- Is the spatial approach and distribution sound?
- Are the forecast components of supply robust?
- Is the plan sufficiently flexible¹ to address changes in circumstances?

Level of Housing to 2026

1.2 Paragraph 53 of PPS3 (June 2010) requires the Greater Norwich Development Partnership (GNDP) to identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption within LDDs. Within the SHLAA, the GNDP should also²:

- Identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.
- Linked to above, identify those strategic sites which are critical to the delivery of the housing strategy over the plan period.
- Show broad locations on a key diagram and locations of specific sites on a proposals map.

¹ PPS12 P21 sets out definition of justified, effective (being deliverable, flexible and able to monitored) and consistent with National Policy.

² Paragraph 55 PPS3 June 2010

- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

- 1.3 Following the abolition of the RSS by the Government, the GNDP confirmed its position that the RSS requirement as set out in Policy 4: Housing Delivery remained the appropriate housing requirement (agreed at Full Council on 23 September 2010). The RSS set out a requirement for 41,800 dwellings in the NPA from 2001 - 2026 (paragraph 6.5 of JCS). This equates to 1,672 dwellings per annum. As of 2008, 21,500 dwellings had been committed and therefore a further 21,000 dwellings were required to be found to meet the target at 2026.
- 1.4 In February 2010, the GNDP released (EIP 16) its Statement on 5 year Housing Land Supply. Paragraph 5 identifies that as at the end of 2009, there was a shortfall of 2,330³ units in the NPA and that the current monitoring year (2009/10) indicated only a delivery of 945 units. Therefore as at the end of March 2010 (i.e. the most up to date position), the NPA was required as per the RSS housing requirement to deliver 15,048⁴ dwellings but has only achieved 11,815 representing a shortfall of 3,233 dwellings across the NPA.
- 1.5 As such, the existing deficit of 3,233 dwellings should be made up over the remainder of the plan period. Notwithstanding that the trajectory identified in Appendix 6 of the JCS is now out of date, EIP 16 is clear (paragraph 5) that in the past 9 years, only once (2007/08) did the NPA achieve a completion rate above the RSS requirement and above the future 15 yr requirement from 2010 onwards. A more realistic measure of likely performance is to note that on average, the NPA has delivered only 1,313 dwellings per annum in the period 2001/02 – 2009/10. This points to a need for greater flexibility to address shortfalls and delays in delay in delivery, regardless of the merit of the allocations/identified locations.

B Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of developable housing land for years 0-5 (and deliverable land for years 6-15) in the overall context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?

- 1.6 PPS3 requires the JCS to *'identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption within LDDs.* We have commented elsewhere as to our concerns as to the rate of delivery. The DPDs/AAPs that form each authority's LDF will be progressed by the individual authorities. The JCS does not make any provision for strategic allocations (based on the GNDP Policy Group decision

³ This was based against an annual requirement of 1,650 and not 1,672 as set out in paragraph 1.3

⁴ Figure based on actual annual EEP requirement of 1,672 units

not to take forward the SoFC relating to the Strategic Allocation). A summary table of the proposed timetables are set out below:

Table 01: GNDP LDS TIMETABLE FOR SITE ALLOCATION DPD's

Broadland LDS (2010)		
	Anticipated Date	Delay
Site Allocation DP	Commencement: Aug 2009 Publication of Submission: May 2011 Submission to SoS: November 2011 Adoption: Spring 2012	LDS identifies a degree of risk based on JCS adoption – which is delayed. Note para. 4.10 of LDS identifies that a growth area DPD will be replaced by an SPD and there is no timetable attached.
Norwich LDS (March 2010)		
	Anticipated Date	Delay
Site allocations plan	Consultation 1 – Reg 25: Nov 2009 – Jan 2010 Consultation 2 – Reg 25: Aug – Sept 2010 Soundness test – Reg 27: May – June 2011 Submission: Aug 2011 Examination: Nov 2011 Adoption: April 2012	Consultation 1 undertaken but Consultation 2 is delayed until Jan 2011 – March 2011. Other milestones also moved on by 4 months.
South Norfolk LDS (2010)		
	Anticipated Date	Delay
Site Specific Polices and Site Allocations DPD Wymondham and Long Stratton AAP	Reg 25 Consultation: September 2010 Publication of Submission: May 2011 Submission to SoS: September 2011 Examination: March 2012 Adoption: July 2012	Current Consultation at present re. Site Allocations and Wymondham/Long Stratton AAP

1.7 Table 1 demonstrates that the Site Allocations DPDs are not anticipated to be adopted (at earliest) until Spring/Summer 2012 for all three authorities. This is some 18 months away and Norwich City's Site Allocation DPD has been delayed by four months. The above timetables represents further delay of identifying deliverable sites to meet the JCS trajectory.

C If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1.8 Our concerns primarily relate to the level of development identified for various settlements, the timing and delivery of the various proposed identified sources of housing land supply and the lack of flexibility.

1.9 In the light of the potential 'delay' of delivery of housing, it is critical to ensure flexibility is written into the plan.

1.10 It should be noted that a planning application is to be submitted shortly in respect of proposals at Aylsham to provide for circa 300 dwellings. The proposals are currently subject to a Screening response and therefore matters relating to the environment are on going for the purposes of the directive.