

Statements on behalf of The Fairfield Partnership

Matter 2 – Does the JCS make sound provision for housing delivery? (Policy 4 & Appendix 6: the housing trajectory)

Summary

These representations are concerned solely with the matters raised under Parts B and C of Matter 2 i.e. the mechanisms and timescale for the delivery of housing, including the changes required to render the JCS sound.

In summary, our contention is that the housing trajectory at Appendix 6 is neither realistic nor helpful in terms of its assessment of the short-term land supply position. In the absence of the RSS, the PPS3 5 year land supply falls to be tested against the provisions of the Development Plan, in this case the JCS. If the JCS recognises the fact that housing delivery in the short term is expected to be lower, and that delivery will increase in latter years as the major strategic allocations come forward, it will set a more appropriate framework for both subsequent DPDs and against which applications for planning permission can be tested, establish a more realistic framework for the delivery of infrastructure, and avoid the problem that the JCS currently faces, which is the risk that its own overly ambitious trajectory undermines its ability to deliver.

We suggest a different approach to the housing trajectory accordingly, and a minor modification to Policy 4, to cross refer to the housing trajectory, in response.

In terms of the longer-term supply (6-15 years), our principal concern relates to the suitability/deliverability of the proposals for Long Stratton, which is covered in our submissions under Matter 1 and Matter 3.

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Representations to Part B – Mechanisms and timescale for housing delivery

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 context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?

1. The abolition of Regional Spatial Strategies does have important connotations for the implementation of paragraph 53 of PPS3. Obviously as drafted, the requirement under para 53 is for DPDs to set out how they will deliver a continuous supply of housing land for at least 15 years, tested against the provisions of the Regional Spatial Strategy.

2. In this case, the old RSS set out an overall level of development for the constituent Local Authorities in the GNDP area, expressed both as an overall quantum to 2021, and as an annual average (in relation to the un-built element at 2006). The old RSS did not provide any indication of the phasing of development over that period, and therefore the 5 year land requirement would simply be calculated as:

Remaining requirement at relevant date

Number of years remaining in Plan period x 5 = 5 Year Requirement

3. Following the abolition of the RSS, the housing requirement will be set by the Core Strategy, and the Core Strategy alone. Assessing whether a Core Strategy makes appropriate provision for continuous housing delivery is not now a test of comparing the provisions of one document against the requirement of another, but essentially testing the housing delivery provisions of the Core Strategy against itself.

4. It is therefore quite possible for a Core Strategy now to set out a phased approach to housing delivery, that for example takes account of market factors, current delivery rates, and updated DPD timescales, even though the old RSS on which it was originally based made no assumptions about phasing.

5. Given that (a) a substantial proportion of the new homes required in this Core Strategy will be delivered on sites that have yet to be allocated; that (b) the scale of housing development represents a significant increase in comparison to housing levels in the Norfolk Structure Plan, and (c) given the effects of the current recession, it is not unreasonable for the JCS to take a pragmatic view that in the short term, levels of housing supply will not increase substantially on current rates, but in the medium to longer term, as new sites come forward, the rate of delivery will increase.

6. If the Plan is explicit that such phasing is expected and planned for, then any assessment of the 5 year and longer term supply would need to reflect the fact that the Plan itself envisages a stepped change to delivery.

7. Turning to the provisions of the Core Strategy as currently drafted, the housing trajectory at Appendix 6 sets out the expected timescale for the

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delivery of around 49,000 dwellings between 2001-2026. The trajectory appears to suggest via the 'PLAN' element that it is the intention to provide that quantum of housing via achieving 1,875 units per annum between 2001 and 2021, and then 2,000 units per annum in the last 5 years of the plan period, between 2021 and 2026.

8. We question whether these figures have any relevance now – the 1,875 per annum is simply the aggregated average of achieving the old RSS Policy H1 total of 37,500 homes (2001-2021) over 20 years. Equally, the 2,000 homes per annum from 2021 is also drawn from the old RSS, being the annual average required at 2006 established by Policy H1, spread over 5 years from 2021 as the 'roll forward' element of RSS Policy H1.
9. In the absence of the former RSS annual rates, the opportunity now exists to base the trajectory on a more realistic rate of provision, updated to reflect current timescales and local circumstances.
10. Looking at the trajectory in Appendix 6 as currently drafted, we would make the following observations:
 - From 2001 to 2008, the actual annual average completion rate has been 1,690 units per annum, and when the figure for 2009 is added (1,415 units, according to the three respective AMRs published in 2010), completions rates are currently around 1,650. It is hard to see rates substantially increasing in the next two years, and therefore by 2011, the overall annual average for 2001-2011 is likely to be more like 1,600 units per annum;
 - From 2008 and 2014, the trajectory assumes that over 75% of existing housing commitments will be completed. Given current market conditions, we would expect this supply of housing to be more of a 'slow burner', with a lower supply in the immediate future, but a more constant supply over a longer period;
 - Between 2011 and 2013, some 640 units are expected to be delivered at Rackheath – this seems a little optimistic;
 - Conversely, none of the other growth locations are predicted to achieve any completions before 2014, and none of the non-strategic/small sites for Broadland/South Norfolk are predicted until 2014. Given the published timescales for the preparation of Site Allocation/AAPs, this would appear realistic, but since there are undoubtedly sites that could deliver earlier if the relevant frameworks were in place, this does mean that there is an urgency to get this Core Strategy in place and the next round of DPDs done as expeditiously as possible;
 - The actual annual projected rate of completions varies year in year out, but generally the trajectory envisages a major increase in housebuilding in the middle of the plan period, broadly between 2011 and 2021, and development tailing off in the final years of the plan. Given the lower rates of development in the early years, and given the

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fact that many of the larger sites will be delivering towards the end of the Plan period, we do not consider this tailing off towards 2026 realistic – rather, it seems more likely that supply will need to be stepping up towards the end of the Plan period;

- It should also be noted that our representations in relation to Matters 3, 4 and 5 suggest that there may be a greater delay in the deliver of some of the infrastructure required to bring forward the proposed growth than the JCS currently anticipates. This suggests that delivery may be slow in the early years of the Plan period, and will accelerate as critical infrastructure enables development to come forward;
- As a general note, trying to set out a trajectory with detailed figures for individual years does not in our view add much substance to the Plan. It is notoriously hard to predict completion numbers in a single year with any accuracy, and therefore providing specific annual predictions (down to individual units) implies a spurious level of accuracy to the trajectory, which is generally unhelpful. In our view, a more robust alternative is to provide for broad estimates of completions for a given time period, aggregated over that period, rather than targets for individual years.

11. So to return to the Inspector’s question, at the moment, the Core Strategy will not be effective at delivering sufficient housing for years 0-5, because there are insufficient sites in the pipeline to meet the requirement, as it is currently portrayed (1,875 units per annum), and there is little opportunity to radically bring forward the timescale for subsequent DPDs to effect an earlier delivery of strategic sites. For that reason, the JCS is unsound in respect of housing delivery in the short term, because its provisions cannot be delivered.
12. The options for the short-term land supply position therefore appear to be either to implicitly endorse early applications on a ‘first come first served’ basis, to make up the deficiency, on the basis of guidance in PPS3, or to use the opportunity afforded by the deletion of the RSS for this Core Strategy to provide a phased approach to land supply that recognises constraints in the short-term. We suggest possible minor revisions to achieve the latter in Part C below.
13. Our proposed revisions would not reduce the urgency for Site Allocation DPDs to come forward, since even with our revised phasing there will still be a need to bring forward new allocations at the earliest opportunity to meet the expected increases in annual delivery in future years. We note in our representations on Matters 3 and 10 that the JCS already contains an element of flexibility in relation to the ‘non-strategic / smaller sites’ allocations for South Norfolk and Broadland, which will allow development to be allocated by subsequent DPDs, and should for instance help to overcome issues surrounding the slow delivery of enabling infrastructure in some parts of the NPA. However, we believe that the JCS requires further flexibility in order to be deliverable, and our proposed changes should help to provide this, by acknowledging the fact that major new allocations will take time to come forward.

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14. In terms of the longer-term land supply and years 6-15, we believe the Core Strategy is flawed in its reliance on Long Stratton, where the balance of evidence strongly suggests that this proposal is undeliverable (as well as being undesirable). We address this matter separately in our representations to Matter 3, in which we suggest amendments to increase the flexibility of the Core Strategy to overcome such concerns.

Representations to Part C - If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound?

15. As indicated above, proposed changes to the JCS to deal with the overall delivery of sufficient housing are covered in our representations to Matter 3.
16. In terms of the short-term housing supply and the housing trajectory, we would suggest that the Council be invited to amend and simplify the housing trajectory to have regard to the above comments, in particular by the following changes:
- Amend the “PLAN” element of the GNDP Housing Trajectory on page 107 to more accurately reflect rates of provision as follows:
 - 2001-2011 – 1,600 units per annum (cumulative total 16,000);
 - 2011-2016 – 1,850 units per annum (cumulative total 25,250);
 - 2016-2021 – 2,250 units per annum (cumulative total 36,500);
 - 2021-2026 – 2,325 units per annum (cumulative total 48,125).
 - Adjust the annual delivery figures to reflect the revised phasing, and simplify the Trajectory by providing approximate supply figures, rather than specific figures;
 - Amend Policy 4 to make clear that the delivery of new homes is expected to occur broadly in accordance with the phasing of delivery set out in the Housing Trajectory, for example by amending the first sentence of the Policy as follows:

“Allocations will be made to ensure at least 36,740 new homes between 2008 and 2026, of which 33,000 will be within the Norwich Policy Area (NPA – defined in Appendix 4), distributed in accordance with the Policies for Places, and broadly in accordance with the expected phasing of delivery identified in the Housing Trajectory (Appendix 6)”
17. These amendments to the housing trajectory alter neither the total quantum nor the distribution of development, and affect only the phasing of delivery. As such they would have no material implications for the substance of the sustainability appraisal. By the same token, the proposal to link Policy 4 more



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explicitly to the Housing Trajectory is simply to assist the clarity and interpretation of the JCS.

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