Fair Play for Felixstowe

Hearing Statement – Matter 2 A: Housing Provision

1. Fair Play for Felixstowe submit the following statement in response to the Issue and the specific Questions raised by the Inspector in MIQ Matter 2 A (document H6).

Further detailed representations can be found in Representations on Suffolk Coastal District Final Draft Local Plan – in Representor Order (document A7 page 902 onward).

2. **Issue:** Is the overall strategy and provision for housing development effective and justified?

   **Response.** Overall strategy and provision for housing development is not effective, nor justified. To make the plan sound in this respect we believe the following changes should be made to the plan:

   i. Use the latest household projections and affordability ratios to calculate overall housing need. That is, 542 dwellings per annum, totalling 9,756 over the period of the Plan.

   ii. Set a realistic and justified housing contingency policy which clearly takes account of windfall housing and housing requirements identified in all Neighbourhood Plans.

   iii. In order to meet the requirements of paragraphs 68 and 70 of the NPPF (document C1) the Plan needs to give greater weight and support for development of windfall sites. Section 3 of the Plan completely omits any windfall provision in policies and decisions to meet the required housing growth. The Plan does include a windfall assumption that 50 dwellings per year can be achieved from 2020/2021 onwards, however this is completely at odds with the historic windfall delivery rates and expected future trends. A more realistic assessment of the level of windfall provision should be made, based on compelling evidence, and included in housing growth policies and decisions in Section 3 of the Plan.

   iv. Set a 10% level of housing contingency in order to provide a reasonable and justifiable level of flexibility in the housing supply to ensure delivery of the housing requirement over the Plan period. This level of contingency, together with (i) above, will set overall housing provision at 10,730 dwellings, resulting in a residual housing requirement (i.e. new housing allocation) of 2,000 dwellings over the period of the Plan.

   v. The distribution and location of housing growth should be a policy in its own right, rather than in Table 3.3 of the Plan, following policy SCLP3.1 Strategy for Growth in Suffolk Coastal District. The proportion and scale of growth allocated to the Felixstowe Peninsula (Felixstowe & Trimleys) is unsound based on the employment and infrastructure limitations of the area. Viable alternatives, based on any amended new overall housing allocations, should be explored and evaluated.

3. **Question 2.1** The PPG specifically advises that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes (Paragraph: 005 Reference ID: 2a-005-20190220). The Council’s response to my initial questions, calculates the figure of 542 homes per annum needed on this basis, using the latest published affordability ratio. Is this
figure justified as the minimum number of homes needed in the Plan area on an annualised basis?

Response. The figure of 542 homes per annum is based on the most up-to-date household projections and affordability ratio. As such it is justified to use this figure as the minimum number of homes needed in the Plan area on an annualised basis.

The Final Draft Local Plan (document A1) has a base figure of 582 homes per annum for the minimum number of homes needed, based on old data, and should therefore be amended in Policy SCLP3.1 and elsewhere to reflect the 542 homes per annum, 9,756 total housing need.

4. Question 2.2 What implications (direct and consequential) for the Plan would arise from the use of a housing need figure derived using the 2014 based household projections?

Response. The basis for overall housing need would be reduced by an amount of $(582-542) \times 18 = 720$ homes. Logically this should flow through to reduce the total allocations and consequently reduce the site allocations to avoid unnecessary development of high grade food producing land.

5. Question 2.3 The Plan seeks to provide for a contingency above the minimum housing need requirement. What is the overall provision for contingency (including the windfall allowance and contributions from Neighbourhood Plans) proposed and is it justified?

Response. The Final Draft Local Plan (document A1) provides for a contingency of 8.5% on top the base figure of 10,476 homes needed i.e. a total of 11,368 homes planned over the Plan period. This uses 2016-based housing projection and 2017-based affordability ratio which are now out-of-date. No allowance for windfall or contributions for unmade Neighbourhood Plans has been included, even though windfall estimates have been included in the housing trajectory in Document A1 appendix D.

In reply to the Inspector’s H1 questions regarding the most up-to-date housing projections and affordability ratio, the Council in document H3 recognises that these would be consistent with National Policy, however they would not wish to alter the total number of homes planned i.e. the 11,368 as stated in Table 3.5 of document A1. This means that there would be a contingency of 16.5% on top of a base figure of 9,756.

If windfall of 50 homes per annum from 2020/21, or at least 800 in total, as per para 3.38 of the Plan is added then the overall homes planned increases to 12,168 which is a contingency of 24.7%.

There is compelling evidence that the unsubstantiated 50 homes per annum in the Plan is grossly underestimated. For example, the last 5 years windfall sites below 0.2ha (2013/14 to 2017/18) averaged 97 homes/year as stated in SHELAA report para 2.33 (doc D10). This is without any account of potential windfall sites greater than 0.2ha which historically have contributed significantly greater numbers. The inclusion of a windfall figure of 97 homes per year from 2020/21 is therefore a reasonable and justifiable starting point.

If a windfall of 97 homes per year, at least 1552 homes, is added the homes planned increases to 12,920 which is a contingency of 32.2%.

Finally, contributions from Neighbourhood Plans would be expected to further increase the contingency. There are 18 Neighbourhood Plans, 7 of which are ‘made’, 9 in
progress, and 2 not expected to be progressed. Policy SCLP12.1 of document A1 states indicative minimum housing requirements, over and above Neighbourhood Plan allocations already made totalling 420 additional homes. A reasonable and realistic assumption that at least half of these will materialise will further increase total housing by 210 homes to 13,130 homes, which is a contingency of 34.6%.

High levels of housing contingency cannot be justified. A 10% level of contingency provision is generally accepted as providing a reasonable element of flexibility in the housing supply to ensure delivery of the housing requirement over the Plan period. This level of contingency, including windfall allowance of 97 homes per annum and contributions from Neighbourhood Plans of 210 homes, would result in new housing allocations in the Plan reducing from 4,370 (Table 3.3 document A1) to 2,002, with corresponding reductions in new sites.

The Plan should be changed to specifically include a policy on housing contingency, the level of contingency including windfall and contributions from Neighbourhood Plans, and how it will be used.

6. **Question 2.6** Will there be a five year supply of deliverable housing sites on adoption of the Plan?

**Response.** Yes, even with the changes to housing numbers identified above. A recent Planning Inspectorate review within the context of a planning application in Aldeburgh concluded that there was a 5 year supply.

7. **Question 2.8** Is the rate of delivery envisaged for the proposed allocations as set out in the trajectory realistic and justified?

**Response.** The annualised dwelling delivery (Table 4b of document H3) and housing trajectory graph were amended by the Council in the response to the Inspector’s question 6 (document H1). The total housing delivery in table and graph (11,700) differs from the total housing figure in Table 3.5 (11,368) plus the windfall allowance (800), amounting to a missing 468 homes. It is therefore unsound as it stands. The trajectory would obviously change if the total number of homes planned were reduced in line with the arguments above.

We cannot comment on whether the amended trajectory in H3 report is realistic, except to observe that trajectory is based on data in the Final Draft Local Plan (Document A1 appendix D) that shows house completions for North Felixstowe Garden Neighbourhood beginning in year 2020/21 which is highly unlikely.

8. **Question 2.9** The housing trajectory assumes provision of 50 dwellings per annum by way of windfalls. What is the justification for this figure and is it realistic for the duration of the plan period?

**Response.** See comments in paragraph 4 above. There is no justification for this figure based on historical data and realistic future expectations. It is right to avoid double-counting of existing planning permissions, so we agree that windfall allowance should start from 2020/2021. However, we see no reason not to expect new windfalls to continue at recent historic rates for the duration of the plan period.

*Fair Play for Felixstowe*

*July 2019*