



**Newark and Sherwood Amended Core
Strategy DPD**

**MATTERS 4, 5 and 6 – OAN, SPATIAL
POLICIES 1 and 2 and 5 YEAR LAND SUPPLY**

**Statement on behalf of Newark and
Sherwood District Council**

January 2018

Question 4: Is the OAN reasonable, having regard to its derivation and out-turn?

Introduction

4.01 The Objectively Assessed Housing Need (OAN) in Newark & Sherwood (N&S) and across the Nottingham Outer Housing Market Area (HMA) is derived from the Strategic Housing Market Assessment (SHMA (HOU/01)) of October 2015. The SHMA (HOU/01) adopts the approach recommended in the PPG – starting with the latest official demographic projections and official data, and then considering whether there is a case to adjust the assessment of housing to take account of evidence of demographic change, economic growth, affordable housing or market signals.

Derivation of the OAN

4.02 The analysis started by considering the latest official government projections (2012-based household projections by CLG). These projections suggested a need for 1,074 dwellings per annum (dpa) to be provided across the HMA, including 399 in N&S. Studying the data underpinning the projections suggests that they are sound although the SHMA (HOU/01) does note that projected levels of population growth are below past trend levels.

4.03 The analysis therefore sought to provide some sensitivities to the official projections and this involved looking at two alternatives; first to study long-term migration trends (over the previous 12-years) and secondly to model an adjustment for Unattributable Population Change (UPC). These two sensitivity scenarios are mentioned as reasonable alternatives in the PAS technical advice note.

4.04 Both of these projections showed an increase in the need for housing; at the HMA level the need was estimated to be between 1,257 and 1,285 dpa. Therefore, both projections suggested a similar level of need and the level of population growth was shown to fit comfortably in the range between short- and long-term trends (and therefore considered to be realistic). However, closer inspection of the outputs in terms of projected population growth revealed that local authority information was less robust – this was particularly the case in Mansfield although issues were also observed in other areas.

4.05 To deal with this issue, a third projection was developed which essentially took a midpoint between a 12-year trend and an UPC adjusted projection. This projection showed population growth in all areas which sat comfortably with short- and long-

term trends and was demonstrably more robust than with either of the individual sensitivity projections. This projection suggested a housing need for 1,271 dpa across the HMA, including 446 homes in N&S.

- 4.06 The analysis moved on to look at the relationship between economic growth and population/housing. An economic forecast from Experian was accessed – this being the forecast underpinning the Employment Land Forecasting Study (ELFS (EMP/01)). As well as using the forecast to determine future job growth, the analysis was able to pick apart some of the key assumptions about population growth and the number of residents in employment to develop a bespoke set of employment rates for use in the analysis – these rates were therefore entirely consistent with the economic forecast, ensuring a consistency of approach across the different strands of research.
- 4.07 The outputs from the economic-led projection showed a lower level of housing need than the core demographic projection discussed above and therefore there was no need within the modelling for any adjustments to be made to the housing need figures.
- 4.08 The HBF [Representor 026] make a number of comments on economic growth, they note that only one forecast was accessed (from Experian) and suggest that further forecasts should have been accessed. It is further claimed that Experian forecasts tend to be the most pessimistic. In terms of other forecasts, this would be an additional cost to the Council(s) and was not deemed necessary; the forecast used was an integral part of the ELFS (EMP/01) and there was no suggestion that the forecast level of jobs was not unreasonable. The suggestion that Experian forecasts are most pessimistic is however wrong, in fact the opposite is the case, with Experian typically forecasting much higher levels of job growth than the other main forecasting houses (Cambridge Econometrics (CE) and Oxford Economics (OE)). A good example of this can be seen in a note provided for the East of England Forecasting Model (EEFM) by Neil McDonald - in this document, UK job growth forecast by Experian is some 41% higher than forecast by OE, and 64% higher than forecast by CE (Table 1). Hence the suggestion of Experian being pessimistic is incorrect (See Appendix 1).
- 4.09 The HBF [Representor 026] also discuss employment rates and note comments made in an Appeal decision in Farnsfield. The Council has sought further advice from Experian about this, which is now published as part of the HMA Position Statement - Farnsfield Appeal (HOU/04). The Farnsfield decision highlighted by the HBF

suggested that some of the employment rate assumptions were too positive; the Position Statement notes that there is a consistency between employment rates and jobs, such that any reduction (e.g. in the rates) would need to occur in-line with a reduction in forecast jobs. Hence the criticism highlighted by the HBF does not impact on the housing need. The conclusions can be found in paras 25 to 27 of the Position Statement (HOU/04).

- 4.10 The SHMA (HOU/01) then studied affordable housing need. This showed a clear need for affordable housing in the HMA and N&S. However, the analysis also highlighted how sensitive the outputs are to different assumptions (particularly around the appropriate threshold for affordability). Once account was taken of the types of households in need (i.e. recognising that many already have housing) there was no evidence that any uplift to planned housing figures would be required as a result of the affordable need.
- 4.11 The analysis did however highlight a number of concealed and homeless households (who would not be counted in the demographic modelling) – an uplift of at least an equivalent number of properties was therefore considered to be appropriate.
- 4.12 The final key strand of analysis was around market signals. The picture here was mixed, and on balance the market signals across the HMA are not particularly strong. In the SHMA (HOU/01), analysis was carried out to look at the extent to which CLG were building suppression of household formation into their modelling – where continued suppression was apparent it was considered that a correction for that would be a reasonable response – essentially this would be providing an uplift to housing need so that formation rates were at least as high as they had been historically (taken to be 2001, the date at which household formation rates of younger households started to decline). Across the HMA (and N&S) the evidence did not suggest a particularly high level of suppression, and the CLG projections were already expecting an improvement moving forward.
- 4.13 Hence the additional uplift applied to the area was appropriately quite low and increased the assessed need for housing from 1,271 dpa up to 1,310 (a 3% uplift). For N&S, the uplift applied took the housing need to 454 dpa. It was concluded that these figures (1,310 and 454) represent the OAN for each of the HMA and district respectively.

- 4.14 The figure of 1,310 dpa was some 22% above the start point for analysis (a need for 1,074 dpa) with the figure for N&S being a 14% uplift. These figures are important when considering if the final OAN represents a reasonable uplift, using the start point against which to measure the uplift can be found in para 2a-019 of the PPG. Gladman [Representor 034] also recognise in their representations (paragraph 4.1.7) that it is the official projections that should be used when reflecting on any uplift due to market signals.

Recent information about housing needs in the HMA

Nottingham Outer Demographic Update Paper – May 2017

- 4.15 Subsequent to the SHMA (HOU/01), GL Hearn prepared an Update Report to the work in order to determine if a full review of the OAN was necessary in light of the release of the 2014-based household projection data and Mid-Year Estimates. The Nottingham Outer Demographic Update Paper (May 2017) (HOU/05) concluded that it was not considered necessary to undertake a full review of the OAN. This is consistent with the PPG [ID 2a-016] which makes clear that the publication of new projections 'does not automatically mean that housing assessments are rendered outdated'. Additional information about the Demographic Update Paper can be found in Appendix 2.

Planning for the right homes in the right places: consultation proposals

- 4.16 In September 2017, the Government published a consultation document (Planning for the right homes in the right places). This included a standardised methodology for assessing housing need and also annual housing needs for all local authorities emanating from this methodology. This is still a consultation document, although it is relevant to the extent that both Gladman and the HBF [Representors 034 and 026] note this forthcoming methodology in their statements. Overall, the CLG document suggested a need for 1,320 dwellings per annum across the HMA, virtually identical to the 1,310 figure in the SHMA. This suggests that the SHMA figures remain valid. More information about the consultation proposals can be found in Appendix 3.

More up-to-date (2016-based) projections

- 4.17 In October 2017, ONS published a new set of (2016-based) National Population Projections. These project notably lower population growth than in the previous (2014-based) set, with the UK population projected to be 2 million fewer in mid-

2041. This is driven by lower assumptions about future birth rates and international migration, and an assumption of a slower rate of increase in life expectancy. The key differences are:

- ONS' long-term international migration assumptions have been revised downwards to 165,000 pa (beyond mid 2022) compared to 185,000 in the 2014-based Projections. This is based on a 25 year average;
- The latest projections assume that women will have fewer children, with the average number of children per woman expected to be 1.84 compared to 1.89 in the 2014-based Projections; and
- ONS is no longer assuming a faster rate of increase in life expectancy of those born between 1923 – 1938, based essentially on more recent evidence. Life expectancy still increases, just not as fast as previously projected.

4.18 The table below shows the projected population change in England for the 2013-33 period. Population growth is now projected to be around 16% lower over that period than shown by 2014-based projections, Population growth is also projected to be lower than was shown in the 2012-based projections (which were the ones underpinning the 2015 SHMA). Whilst we cannot be certain what impact the new projections will have for any individual local authority area (or HMA) because these projections are reconciled with those for the UK as a whole (reflecting the ONS' assumptions that there will be lower long-term international migration and lower improvements in life expectancy), it would be reasonable to expect that 2016-based SNPP and Household Projections (and certainly nationally) will in due course show substantially lower growth than the current (2014-based) set.

Projected population growth in England (2013-33)				
	Population 2013	Population 2033	Change in population	% change
2012-based	53,843,600	61,022,500	7,178,900	13.3%
2014-based	53,865,817	61,490,636	7,624,819	14.2%
2016-based	53,865,817	60,251,545	6,385,728	11.9%

Source: ONS

Is the OAN reasonable, having regard to its derivation and out-turn?

4.19 Yes, the OAN is reasonable. The 454 dwellings per annum figure (and 1,310 across the HMA) is taken from the 2015 Strategic Housing Market Assessment (HOU/01)

and as per the PPG is based on an analysis of demographic trends, economic growth, market signals and affordable housing need. The figure of 454 dpa is a balanced view taking account of all of the evidence. Furthermore, recognising that new data has been released since the 2015 SHMA (HOU/01) was published, the Council has reviewed the findings through the Nottingham Outer SHMA Update Report (HOU/05); this review does not suggest that there are any substantive changes to the need, such that the 2015 SHMA (HOU/01) should be considered out of date.

- 4.20 Ashfield [Representor 020] and Mansfield District Council [Representor 017] fully support Newark & Sherwood's proposal to adopt its Objectively Assessed Need of 9,080 dwellings over the plan period 2013-33, noting that this figure has been derived from the Strategic Housing Market Assessment 2015 (HOU/01) which was prepared through partnership work across the Housing Market Area under the Duty to Cooperate. Through the adoption of the OAN as a minimum housing target the three authorities within the Nottingham Outer Housing Market Area will ensure that the full objectively assessed housing need of the HMA will be met. A Memorandum of Understanding has been signed by Ashfield, Mansfield and N&S District Councils which includes a formalised agreement to deliver the Objectively Assessed Needs identified for each of these authority areas, within their own District Boundaries.

Question 5: Bearing in mind any conclusions on 4 above, do Spatial Policies 1 and 2 represent a sensible approach?

- 5.01 As part of the Allocations & Development Management DPD Adopted in July 2013 (CS/05), the District Council committed to review the Development Plan including if necessary rolling forward the end date of the Plan and addressing changes required as a result of updated evidence. The Core Strategy (CS/04) was Adopted prior to the publication of the National Planning Policy Framework and was therefore based on a “policy on” approach to housing, rather than on meeting the Objectively Assessed Housing Needs (OAN) of the District as now required.
- 5.02 As noted in response to Question 4, the District Council considers that the OAN for the District is 454 dwellings per annum. The HMA Authorities are meeting their own requirements as are all other adjoining authorities. A Memorandum of Understanding (See Matter 2 - Appendix1) has been signed by Ashfield, Mansfield and Newark & Sherwood District Councils which includes a formalised agreement to deliver the Objectively Assessed Needs identified for each of these authorities’ areas, within their own District Boundary. The District Council is therefore proposing to meet a minimum housing requirement of 9,080 dwellings during the Plan period.
- 5.03 Spatial Policy 1 sets out those settlements which are central to the delivery of the Spatial Strategy, identifying their features and function within the District. The majority of this policy remains unchanged from that in the Adopted Core Strategy. However, the earlier than anticipated closure of Thoresby Colliery created a significant regeneration opportunity within the Sherwood Area and is considered to represent a sustainable location for growth. Edwinstowe has therefore been changed to a Service Centre within the hierarchy.
- 5.04 Whilst the Nottinghamshire CPRE [Representor 008] don’t think it is possible to achieve the growth envisioned in a sustainable manner, the agent for a major landowner within the area feels that the strategy does not identify sufficient growth to deliver the required regeneration and provide the critical mass to support Edwinstowe's facilities. However, the District Council is satisfied that the development of this site has been factored into the production of the Infrastructure Delivery Plan (INF/01) and other evidence base documents and will provide a sustainable mixed use development. It should be noted that an outline permission (16/02173/OUTM) for “Upto 800 dwellings, a strategic employment site comprising up to 4,855 sqm Class B1a, up to 13,760 sqm Class B1c, and up to 13,760 sqm Class B2, a new Country Park, a Local Centre, "The Heart of the New Community" containing a mix of leisure (to include zip wire), commercial, employment, community, retail (up to 500 sqm), health, and residential uses, a Primary School, Open Space and Green Infrastructure (including SUDS), and associated access works

including the details of the primary access junctions into the site from Ollerton Road” now has a resolution to grant permission subject to the signing of a Section 106 agreement (OTH/01).

- 5.05 Spatial Policy 2 sets out the spatial distribution of growth for the District focusing on the principles of supporting the sub regional centre of Newark Urban Area; seeking to secure new employment opportunities, the regeneration of vacant land and the provision of new housing in Service Centres and Principal Villages identified for regeneration; and securing sustainable communities to support local housing and employment needs. The allocation of a new strategic site at Edwinstowe means it is now more appropriately identified within the regeneration strategy.
- 5.06 In seeking to meet the OAN of 9080 dwellings over the Plan Period, the District Council has assigned a % of overall growth to the Sub Regional Centre, the Service Centres and the Principal Villages. The requirement is to cover the period between 2013 and 2033 and as rightly pointed out by a number of representors, this should be expressed as a minimum requirement. The following modifications are therefore proposed for clarification:

Amend the first sentence of para 4.17 to read:

In seeking to meet the District’s Objectively Assessed Housing Need (OAN), the District Council must plan for a minimum of 9,080 dwellings over the Plan period.

and the first sentence of the second paragraph of Policy SP2 as follows:

The housing requirements for Newark & Sherwood District between 2013 and 2033 are a minimum of **9080** dwellings. (CMA/0002) and

Amend Policy SP2, paragraph between the housing and employment tables, first sentence to read: The employment land requirement for Newark & Sherwood District between 2013 and 2033 is a minimum of 83.1 hectares (CMA/0003)

- 5.07 As the Plan period commenced in April 2013, it is necessary to take account of completions and commitments which already exist in those areas which do not form part of Policy SP2. These have been discounted from the minimum 9080 requirement to give a figure of 8806 dwellings (as at April 2016) to be provided for by the Settlements Central to the Delivery of the Spatial Strategy over the Plan period. When looking at the distribution of housing growth, it was considered prudent to reduce the percentage assigned to the Sub Regional Centre from 70% to 60% as this better reflects the longer than anticipated lead in times for the delivery of the 3 strategic sites in the Newark Urban Area. As Edwinstowe has now been

elevated from a Principal Village to a Service Centre, 10% has been added in to this tier to give a total of 30% and the Principal Villages category remains at 10%.

- 5.08 Within the Service Centres and Principal Villages, growth has been further divided between the settlements to reflect the current situation with regard to completions, commitments and the allocations in the Adopted Allocations and Development Management DPD (ADM DPD) (CS/05). When looking at the allocations, regard has been had to the work that has been undertaken on the review of the ADM DPD (CS/05), as set out in the Preferred Approach Sites and Settlements document which was published for consultation in January and February 2017 (CS/21). Those sites which we know are no longer available, or where we have doubts over delivery, have been discounted from the potential supply of sites which may be available to meet the residual requirements as shown in Appendix C of the N&SCSR (CS/01-02). When taking account of these allocations, and potential opportunity sites, the District Council is confident that it has more than sufficient land identified to meet the housing requirement. This is clearly shown in the housing trajectory at Appendix C of the N&SCSR (CS/01-02). A housing trajectory chart reflecting this has also been produced and is appended to the report as Appendix A. For clarification purposes it is suggested that this Chart be included within Appendix C of the N&SCSR.

Additional Modification (CMA/0016)

Add Housing Trajectory Chart to Appendix C of the N&SCSR

- 5.09 A number of agents on behalf of their clients have suggested that the proportions should be allocated differently in order to accommodate further sites which they are seeking to promote in the SP2 settlements through the Plan Review. Others make reference to the need to apply the percentages flexibly with Grace Machin [Representor 40] believing that Table 1 of Appendix C appears to indicate a ceiling for the number of dwellings in a settlement, they further note that where some settlements are not delivering their anticipated quantum there should be sufficient flexibility to allow that need to be delivered elsewhere.
- 5.10 The District Council is satisfied that the proportions of development required can be accommodated within the SP2 settlements on sites which have already been put forward for development in the ADM DPD (CS/05). The percentage figures expressed in the Policy are indeed a guide, the figures in Appendix C provide a snapshot in time picture of what number of dwellings that percentage represents and what we must plan for over the Plan Period by way of housing allocations, not a ceiling on development. As Development Plans are intended to guide development over a 15 - 20 year period, it will always be the case that development in some more popular areas will come forward before others. Allowing development to be met in other areas in the short term would completely undermine the Plan led system. If it

becomes clear that development is not coming forward in the medium to long term, this is more appropriately dealt with by the Development Plan process.

- 5.11 Town-planning.co.uk [Representor 011] has produced an alternative settlement hierarchy including an additional tier of settlements to be given allocations and Sutton on Trent being placed lower down the hierarchy. Carter Jonas [Representor 040] also consider there should be increased development in lower order settlements in the form of extensions and “rounding offs.”
- 5.12 The District Council is satisfied that Sutton on Trent is correctly placed within the hierarchy and sufficient development to meet the requirement has a resolution to grant permission subject to the signing of a Section 106 agreement. The level of development being proposed in many of the lower order settlements under Representor 011’s approach would amount to 1 or 2 dwellings and this level of development is better addressed through Spatial Policy 3 Rural Areas. Sufficient land is provided within the SP2 settlements to meet the minimum requirements and this is considered to be a sensible and sustainable approach. The provisions of Policy DM1 - Development within Settlements Central to Delivering the Spatial Strategy in the ADM DPD (CS/05) allows for additional appropriate development within the Urban Boundaries and Village Envelopes. There is therefore no need to provide for the expansion of the villages in the rural areas over and above the development which would be allowed by the criteria of Spatial Policy 3 (See Matter 7).
- 5.13 IBA Planning [Representor 045] contends that the District Council has erroneously included 60 self-contained extra-care units consented in outline pursuant to the original mixed-use allocation Co/Mu/1 to arrive at a residual housing land requirement of minus 20 dwellings. However, the District Council had regard to a number of factors when including the C2 self-contained units within the housing requirements and these are outlined in the attached note on C2 Self Contained dwellings (Appendix 4).
- 5.14 National Planning Policy Guidance at paragraph 37 sets out that Local planning authorities should count housing provided for older people against their housing requirement, noting that the approach taken should be set out in the Local Plan. The Strategic Housing Market Assessment (HOU/01) details the need for specialist housing solutions for older people, including sheltered and extra care housing and confirms that this represents about 15% of the need shown and forms part of the OAN.
- 5.15 Not including self-contained C2 uses within the housing requirements not only has the potential to undermine the provisions of the Local Plan but could also lead to a less positive approach being taken to development which is clearly needed to

provide for the objectively assessed needs of Newark and Sherwood's ageing population.

- 5.16 However, in order to make the position clearer the following amendment is proposed:

Amend paragraph 5.13 to read

.... adaptable to meet the needs of elderly and disabled residents. Where self-contained C2 units are proposed for older persons occupation, these form part of the housing requirement as identified through the Strategic Housing Market Assessment. The Study also indicates ...

- 5.17 In conclusion, the District Council is confident that Spatial Policies 1 and 2 present a robust and sensible approach to delivering the Objectively Assessed Housing Needs of the District. Sufficient land has been identified to meet those needs and further flexibility is available through the provisions of Spatial Policy 3 Rural Areas and Policy DM1 of the ADM DPD (CS/05). In addition, the strategic sites at Land South of Newark and Land around Fernwood have capacity which is currently identified beyond the plan period which could be brought forward earlier if the market requires.

Question 6: Are they likely to support a five year supply of deliverable housing sites?

- 6.01 The Council believes it has a 6.2 year supply of housing land, including a 20% buffer and meeting the shortfall of 128 dwellings within the five year period as set out in the 5 Year Housing Land Supply Statement (Appendix 5). A 50 dwelling per annum windfall allowance in years 4 and 5 is also included which the HBF [Representor 040] notes “seems reasonable”.
- 6.02 A number of Representors, including the HBF [Representor 026] do not agree with the Council’s shortfall figure of only 128 dwellings seeking clarification that shortfalls against the adopted Core Strategy housing targets prior to 2013 have not been written off by re-setting the plan dates so unmet needs from the previous period remain unaccounted for. The Strategic Housing Market Assessment (HOU/01) at paragraph 10.39 makes clear that:
- This SHMA report considers housing need from 2013-33. Any shortfall in housing delivery prior to the 2013 starting point has been considered and taken into account in the adjustments made to derive the SHMA conclusions regarding the Objectively Assessed Need (OAN) for housing. Therefore the Councils are not required to add any historic backlog (pre-2013) onto the overall housing need calculations. In doing so they would in effect be double-counting.
- 6.03 The HBF [Representor 026] note that the Council’s 5 YHLS assumes that all of the allocations will be found sound but the soundness of individual allocations will be discussed throughout the course of the two Development Plan Document Examinations. The allocations included within the 5 Year Land Supply have already been found sound through the Adoption of the Allocations & Development Management DPD in July 2013 (CS/05). As part of the Plan Review process contact has been made with the owners/developers of the allocations and advice regarding anticipated delivery timings has been sought. These have then been sense checked by officers to ensure they are not too optimistic and in many cases the anticipated trajectory has been revised downwards to ensure the supply figures are robust. The District Council seeks regular updates on progress from both landowners and developers of both allocations and sites with planning permission in order to make informed judgments when producing its housing trajectory and 5 Year Land Supply statements.
- 6.04 Grace Machin [Representor 040] have specifically questioned the deliverability of some of the sites identified to contribute to supply. They cite concerns over outline permissions which are not yet the subject of Reserved Matters Applications and concerns regarding the development rates assumed for the large Strategic Urban

Extensions. They also note concerns regarding the new allocation proposed for Thoresby Colliery, doubting that the intended 60 no. dwellings will be available to contribute towards the 5 year supply. These concerns were recently aired at a Public Inquiry into development at Farnsfield (Reference: APP/B3030/W/17/3169436 & 3179732) which is to be determined by the Secretary of State). As part of the evidence for that appeal the supply for the Thoresby Colliery site, which is the subject of a resolution to grant permission subject to the signing of a Section 106 agreement, was agreed to be 235 dwellings within the 5 YLS, as suggested by the appellants. It is worth noting that the final position for the LPA was 6.36 years, against an OAN of 454, and 5.45 years for the appellant (See Appendix 6).

6.05 In the recent case of *St Modwen Developments Ltd v SSCLG and East Riding of Yorkshire Council* [EWCA] Civ 1643 the Court of Appeal has handed down a judgement affirming the High Court Decision made last year (*St Modwen Developments v SSCLG & East Riding of Yorkshire Council* (2016) EWHC 968 (Admin)) (Appendix 7 refers). The judgment considers the meaning of “deliverable sites” in the context of Paragraph 47 (and Footnote 11) of the NPPF which considers sites as being available if:

- They are available now;
- Offer a suitable location for development;
- Achievable with a realistic prospect that housing will be delivered on the site within five years; and
- The site is viable.

Lord Justice Lindblom explained that each of these considerations goes to a site’s capability of being delivered within five years, not to the certainty or probability that it actually will be (Paragraph 38). Sites can be included in the five-year supply if the likelihood of housing being delivered in this timeframe is a realistic prospect. The Judge added that deliverability is not the same thing as delivery and the fact a particular site is capable of being delivered within five years does not mean that it necessarily will be. He acknowledges that there are various financial and commercial reasons outside local planning authorities’ control that may mean a site cannot be delivered (Paragraph 35).

6.06 In conclusion the District Council is confident that Spatial Policies SP1 and SP2 are capable of delivering sufficient sites to enable more than a 5 year supply of housing to meet the District’s needs. The 5YHLS statement was produced prior to the *St Modwen* decision being handed down and the effects of that decision would potentially increase the number of dwellings from allocations which could be included within the 5YHLS significantly. The Plan makes provision for more than the housing requirement to ensure that even if all sites do not come forward as

anticipated, sufficient flexibility has been built into the Plan to ensure that the needs of the District can be accommodated.