

Joint Core Strategy for Broadland, Norwich and South Norfolk, Broadland Part of Norwich Policy Area Examination

Inspector: David Vickery DIPT&CP MRTPI

Programme Officer: Annette Feeney

CPRE note - for consideration by Inspector Vickery at the re-convened hearing re: the Joint Core Strategy for Broadland, Norwich and South Norfolk, Broadland Part of Norwich Policy Area Examination - July 24 / 25 2013

This note should be considered in conjunction with our previous submission (copied below) entitled: **Analysis and comparison of CPRE and GNDP statistics with respect to Household Interim Projections 2011 - 2021 (as published by the Department for Communities and Local Government)**

The note is relevant to submissions received by June 21st namely:

- The GNDP paper on housing (Persistent under delivery assessment statistics)
- The GNDP suggested flexibility policy

It also provides sobering reflections on the over optimistic assertions of the 3 council leaders in their letter to Mr Vickery dated June 21, 2013 especially their statement "The trajectories of potential housing delivery have been updated and are credible and robust." CPRE does not believe that this statement is supported by the evidence of the household projection statistics.

President
Professor Tim O'Riordan

Chairman
James Parry

Treasurer
John Davies

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Dear Sir,

CPRE considers the following points important and asks that they be given due consideration at the re-convened hearing:

1. With regard to the information you requested, under Agenda Matter 2 in the original hearing, as to whether the evidence base justified the housing targets in the Joint Core Strategy CPRE is pleased that the hearing established agreement between Mr Morris (for the GNDP) and myself (on behalf of CPRE) that broadly speaking our separate analyses of the Household Interim Projections 2011 - 2021 produced similar numerical outcomes.
2. The GNDP and CPRE agreed that **for the period 2008 - 2026 a total of 41,930 completions** are required to reach the minimum overall Joint Core Strategy housing target of 53,770 dwellings and that by comparing 41,930 with the GNDP dwellings requirement, in Figure 3 (from TP13) of 32,700, the JCS target represents an **over supply of 9,230 houses**. Comparing the 41,930 requirement with the CPRE figure of assessed need for 30,610 houses for the period 2008 - 2026 (i.e. dwellings requirement 2011 - 2021 of 26,469 plus the actual number of dwellings completed 2008 to 2011 of 4141) reveals an **over supply of 11,320 houses**.
3. However differences of opinion remain with regard to the interpretation of the significance of these comparisons. The GNDP conclude (in 4.3 of TP13) that “these projections add to the range of evidence” that shows “that the housing targets of the adopted JCS remain reasonable”. CPRE conclude that the large gap between the overall housing target for the GNDP / JCS and the evidence provided by the household projections allows for a significant reduction in housing numbers.
4. We note your comment that central government policy encourages an over supply of housing but respectfully point out that we were asked to examine the evidence base for the housing target(s) in the JCS and in this context CPRE considers that relative to the latest household projections JCS housing targets are excessive.
5. These excessive housing targets pose a major threat to the countryside around Norwich. By UK standards South Norfolk and Broadland have relatively low population densities and are remote from large industrial urban conurbations. Settlements are generally compact and separated from each other and the rural setting of Norwich - a relatively compact city surrounded by countryside - is unusual in England. These factors underpin the area’s rural nature and give it a different landscape from the suburban, homogenised appearance typical of much of England. In our overcrowded country this difference should be cherished and not threatened with demolition by the massive housing growth and associated infrastructure development envisaged in the Joint Core Strategy.
6. The housing targets in the JCS are incompatible with CPRE core objectives to protect and enhance the rural environment. The high level of development envisaged, much of it on Greenfield sites, will lead to a severe erosion of the features that make the countryside surrounding Norwich so special. Rural areas will be suburbanised and tranquillity will diminish as population density, traffic congestion, light and noise pollution increase considerably.
7. The only way to effectively protect the countryside around Norwich is to lower the housing targets and the evidence provided by the 2011 - 2021 household projections, which reveal a large excess of housing supply in the overall JCS housing target, allows for a significant reduction to be made.

8. Many local councils, and we believe a majority of local people, would welcome such a reduction. CPRE / Norfolk fronts an alliance of 22 parish and town councils and local organisations that are calling for a significant lowering of the overall JCS housing target.

9. If the overall target was reduced by 11,000 dwellings this would enable development equivalent to a town the size of Thetford to be removed from the plan. This would reduce pressure for house building on Greenfield sites in the North East Growth Triangle of Broadland and elsewhere in the NPA (e.g. along the A11 corridor and at Long Stratton). We believe a reduction of this magnitude is made possible by the evidence provided by the latest household projection figures.

CONCLUSION

CPRE concludes that insofar as the evidence base does not support either the overall housing target of the JCS, or, as part of this target, the dwellings targets for the Broadland section of the NPA, then the strategy should be considered unsound. We do not accept the claim made by the leaders of the 3 GNDP authorities that: “The trajectories of potential housing delivery have been updated and are credible and robust.”

As a minimum the JCS must be required to demonstrate flexibility in terms of allowing for a review and reduction of housing targets should its housing trajectories be revealed as over optimistic. In this context the release in future of new data on household projection figures will be of considerable significance.

In the event that the examination declares that the JCS in relation to the Broadland Part of Norwich Policy Area is unsound, but does not advise or require a reduction in the overall housing target, CPRE wishes to register a very strong opposition to any re-allocation of housing from the NE growth triangle to any other part of the JCS area, whether in the NPA or not.

Yours faithfully,

David Hook (Chairman CPRE / Norfolk Planning Group)

Attached: Previous Submission

Previous Submission from CPRE Norfolk:

Analysis and comparison of CPRE and GNDP statistics with respect to Household Interim Projections 2011 - 2021 (as published by the Department for Communities and Local Government)

Introduction

In response to Mr Vickery's request I met with Mr Morris at the end of the session on 22/5/13 in an attempt to reconcile apparent inconsistencies between the household projections in Figure 3 of the GNDP document TP13 and those contained in the CPRE submission to the examination.

We discussed the methodology used to produce the projections and agreed that both sets of figures were based on the Household Interim Projections 2011 - 2021 and that broadly speaking the analysis employed by both parties produced similar outcomes.

Differences of opinion remain with regard to the interpretation of the significance of the results. The GNDP conclude (in 4.3 of TP13) that "these projections add to the range of evidence" that shows "that the housing targets of the adopted JCS remain reasonable". CPRE conclude that the large gap between the overall housing target for the GNDP / JCS and the evidence provided by the projections allows for a significant reduction in housing numbers.

THE GNDP ANALYSIS

This shows the growth in the number of households between 2008 and 2026 to be 31,500 (for the JCS area as a whole). In order to calculate the Dwellings Requirement (because there are always more dwellings than households in an area) this number is multiplied by 1.038 to give a total of 32,697 (32,700 rounded to the nearest ten - this is approximately 3.7% greater than the household projection total).

Source of data - DCLG Household Interim Projections 2011 - 2021 Live Table 406

THE CPRE ANALYSIS

This shows the growth in the number of households between 2011 and 2026 to be 25,500 (for the JCS area as a whole). If the same dwellings requirement factor is applied (as for the GNDP analysis) this number increases to 26,469 (25,500 x 1.038).

Source of data - DCLG Household Interim Projections 2011 - 2021 Live Table 427

If the number of house completions between 2008 and 2011 is factored in (4141 according to GNDP Annual Monitoring Reports) this enables a comparison to be made between the GNDP and CPRE figures over the same time period namely 2008 - 2026.

The dwellings requirement produced by the GNDP analysis of 32,700 is not greatly different to the CPRE figure of 30,610 (dwellings requirement 2011 - 2021 of 26,469 plus actual number of dwellings completed 2008 to 2011 of 4141). The discrepancy between the 2 numbers is presumably due to the fact that actual house completions 2008 - 2011 were less than the GNDP predicted dwelling requirement for that period.

The JCS minimum target for house completions can be reduced

The JCS minimum target for house completions represents an over-supply of housing when compared to the dwelling requirement figures produced by both the GNDP and CPRE analyses of household projections.

The GNDP/JCS has a minimum target to build 53,770 new homes during the first quarter of the 21st Century (2001 - 2026) - most of them in the Norwich Policy Area. This total is made up of:

- 11,840 completions (2001-2008)
 - 14,090 commitments
 - 22,965 minimum new allocations in growth locations
 - 4875 windfalls (it is valid to include these houses - they will provide homes for the new households)
- Total = 53,770 (Source - JCS Submission Document February 2013 - page 109)**

For the period 2008 - 2026 a total of 41,930 completions are required to reach this minimum target (53,770 JCS plan target less 11,840 completions up to 2008).

Comparing 41,930 with the GNDP dwellings requirement in Figure 3 from TP13 of 32,700 the JCS target represents an **over supply of 9230 houses** for the period (2008-2026). Comparing 41,930 with the CPRE figure (30,610) for the same period reveals an **over supply of 11,320 houses**. During our discussion Mr Morris acknowledged that comparing the figures in this way produced these results. **NB** the CPRE figure of over supply shown here differs from the number in our submission because it allows for the 3.7% increase used to calculate the Dwelling Requirement.

NOTES

1) 41,930 completions (2008-2026) is a minimum target in the JCS - if allocations to growth locations exceed minimum levels (and the plan allows for this) the housing target rises and if permissions, currently being granted to developers as a result of 5 year land supply shortfalls, are not counted against the target then the inflation of housing numbers above target level will be even greater. Both these factors would lead to a further increase in the surplus of housing (beyond the numbers calculated above).

2) The household interim projection figures are based on statistics that include all the components of change i.e. births, deaths, migrations and changes in average household size - there is no component of change that has not been taken in to account.

CONCLUSION

If the latest household projection figures prove to be accurate and if the JCS delivers all of its planned housing completions by 2026 there will be a significant over supply of housing. Reducing targets to the level indicated by the DCLG figures would allow housing numbers in the NE Growth Triangle and elsewhere in the GNDP area to be reduced. *David Hook (CPRE / Norfolk)*

22.5.13

Footnote If the empty private sector houses (1470 in total for Broadland, South Norfolk and Norwich - source EDP September 9th 2011) were utilised the housing target could be reduced even further.