



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

Submission by CPRE/ Norfolk

The Inspector has invited comments on: **Matter 1** Legal requirements and **Matter 2** the implementation of the submitted JCS proposals

This submission by CPRE / Norfolk is with respect to Matter 2 and specifically relates to ***Issue and Questions:***

1. Whether policy 10's proposals and associated text for employment and housing are positively prepared, justified by the evidence, consistent with national policy, and effective

CPRE / Norfolk consider the housing targets in the GNDP / JCS to be excessive and not justified by the evidence base. Our opposition to the targets is driven by deeply held concerns about the incompatibility of these inflated targets 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.

A copy of our policy statement on the Greater Norwich Development Partnership's Joint Core Strategy is included at the end of this submission.

We appreciate that this examination is concerned with the Broadland Part of the Norwich Policy Area and while many of the comments that follow relate to the whole of the NPA – and often the whole of the GNDP area - they are always applicable to the Broadland section of the NPA too, which is of course a part of these wider areas

CPRE / Norfolk considers the evidence base used to support the high housing targets for both the Broadland Part of Norwich Policy Area and the whole of the GNDP/JCS Area to be flawed, because:

- 1) It is not by justified by housing market trends
- 2) It does not reflect the reality of the housing waiting lists of Norwich, Broadland and South Norfolk Councils
- 3) It does not accord with the evidence in Shelter's local housing watch statistics

- 4) It is not justified by reference to household interim projections published by the Department for Communities and Local Government on the 9th April, 2013
- 5) It is rooted in a desire to encourage inward migration in to the area – i.e. supply led expansion

1) Housing targets are not justified by housing market trends

Our comments on this aspect of the evidence base have been prepared by Dr Ian Shepherd, a member of our planning group, who has undertaken the following analysis (which also includes comments on the CIL and the NNDR).

BROADLAND NORWICH POLICY AREA EXAMINATION

Introduction

The consultation is restricted to the north east growth triangle of the Greater Norwich Development Plan JCS, following the High Court judgement of 24th February 2012, and that a new Sustainability Appraisal for that part of Broadland and the NPA should be prepared. However, the growth triangle forms a major part of planned housing growth within the GNDP, and so we also make some brief comment on this. First we deal with the housing growth in the north east sector, and leaving aside our concerns on landscape and pressures on the natural environment such as water resource, we limit our remarks to some basic aspects of housing matters, and use data in the GNDP AMR 2011/12.

Housing Growth in Broadland NPA, CIL and the NNDR

The JCS is under pressure from the five-year supply of land requirement derived from the NPPF. Overall for the NPA current allocations account for 68.3% of required supply; and within this Norwich is at 100.8%, and South Norfolk at 80.4%. In the Rural Areas of Broadland and South Norfolk, the levels in relation to the required supply are 121.3% and 204.8% respectively. That for the Broadland part of the NPA will be influenced by the Inquiry.

The sites selected for the land supply five-year requirement must be:

- Available for development now
- Suitable as regards location, and
- Achievable, including taking into account the viability of the individual sites

The Sustainability Appraisal will have to embrace of locations and numbers of houses, but also take account of the interaction with the viability of the sites. Examiner Keith Holland (7th March 2013) in dealing with the GNDP proposals for Community Infrastructure Levy (CIL) stated: "The evidence shows the rates proposed for residential development are too high and would pose a significant threat to the viability of housing development in the area". " Within the Greater Norwich Area the residential market is not robust and the rates suggested would not meet the NPPF requirement that they 'support and incentivise' new development".

He suggests that for the Inner Zone of Norwich and immediate surrounds (presumably the NPA) there should be a reduction from £115/sqm to £75/sqm for the CIL charge on residential development; and in the Outer Zone for Broadland and South Norfolk from £75/sqm to £50/sqm.

A large part of the CIL is destined as a contribution for the costs of the Norwich Northern Distributor Road which runs across the growth triangle, and which is seen by the GNDP as being essential to support the planned housing growth. As such there would be a conflict between NPPF policy on viability of the housing sites, and the need as seen by the GNDP for the need for the NDR to support the housing. The most obvious line of approach is to investigate what sustainable level of housing (and locations) might be possible in the north east sector of the NPA in the absence of an NDR, and instead make some minor improvements to existing local roads.

Wider Issues

Should the Inquiry lead to a wider reappraisal of housing growth within the NPA to 2026, we briefly make some comments:

1. On the housing requirement to 2026, the GNDP Annual Monitoring Report states 'The JCS is based on assessment of local need'. It is not in so far that it incorporates large scale net in-migration. Further, the aim of attaining 33% of affordable housing on qualifying sites is slim with regard to housing viability issues, and more so with CIL competing with other needs such as infrastructure.
2. The JCS housing requirement figures were heavily influenced by taking a baseline of the five year growth delivered in the 'boom' period between 2002/03 and 2007/08. But even in an update in August 2012, the Annual Monitoring Report still maintains that the 'JCS looked at a range of evidence sources and concluded that the level of growth strikes a balance between what is achievable with environmental and infrastructure constraints and a reduced level which may artificially constrain delivery'.
3. There is in fact a 'reduced level' of delivery. For the NPA the AMR shows a comparison of the housing completion versus JCS targets were -35% for 08/09; -49% for 09/10; -50% for 10/11; and -50% for 11/12.
4. The 'artificial constraint' appears in the AMR to equate as the global recession, resulting in a slow housing market. In addition, the local Plans which preceded the JCS were based on the 1999 Structure Plan target. In the NPA for 1993-2011 this was assessed at 1,195 housing units per annum, 35% less than the JCS target.
5. We consider that the 'step change' of 35% was never realistic in the context of the 'credit crunch' of 2008, and it is now painfully obvious that this is the case. We would hope that the discussions at the Inquiry opens up the public debate on the futility of a plan which ignores the constraints of five years of recession with no promise of an imminent change, and leads to a much needed review of the JCS.

2) The housing waiting lists of Norwich, Broadland and South Norfolk Councils do not justify the high housing targets

The total number of applicants on the housing registers of Broadland, Norwich and South Norfolk councils is approximately 14,000 but only around 30% are defined as inadequately housed and in several instances the same people appear on more than one register and are therefore counted more than once. Local housing need (4,200 approx. i.e. 30% of 14,000) does not justify the excessive housing targets in the JCS.

3) The housing targets do not accord with the evidence provided by SHELTER with respect to affordable housing provision

In 2010 Shelter assessed that the annual affordable housing needs of the Broadland, SNC and Norwich City Council areas required the building of 843 houses. 833 were in fact built in that year with SNC (the highest ranked provider of affordable homes in England in 2010) delivering 259% of its assessed requirements, Broadland providing 112% and only in Norwich was there a shortfall where only 66% of the need was met.

The successful provision of affordable housing by both SNC and Broadland shows that catering for local affordable housing needs does not have to be based on inflated housing targets. Assuming that affordable housing requirements remain at around the 850 per annum level then the local demand for such properties does not justify the over large housing targets in the GNDP/JCS.

4) Household interim projections published by the Department for Communities and Local Government on the 9th April, 2013 require that the evidence base be re-assessed

The Department for Communities and Local Government has issued a set of Household Interim Projections covering the period 2011 to 2021 for England. These 2011 based projections show a lower growth in the number of households compared with the 2008 projections.

This fact alone should lead the GNDP to carry out a re-assessment of the housing targets in the JCS especially as Norwich is listed as one of the local authorities with the greatest decrease in households compared to 2008 based projections (**Source Table 9b on page 18 of the Household Interim Projections**).

Delving deeper in to the Household Interim Projections (2011-2021), which are based on the 2011 interim sub-national population projections, published by the Office for National Statistics in September 2012 (which include all the components of change i.e. births, deaths and migrations), the following facts are revealed:

The number of households in the GNDP area is projected to grow by 17,000 between 2011 and 2021. For each local authority the predicted changes are:

- Broadland up by 5,000 from 53,000 to 58,000
- South Norfolk up by 6,000 (53,000 to 59,000)
- Norwich up by 6,000 (60,000 to 66,000)

(Source Table 427 - Household Interim Projections 2011-2021)

17,000 new dwellings would therefore be needed to cater for this expansion in the number of households.

To relate these figures to the time span of the JCS (up to 2026) it is necessary to extrapolate the statistics over an extra 5 years. If the same trends continue this would mean 8,500 extra households would be created between 2021 and 2026 thus necessitating a total new housing requirement of 25,500 dwellings (17,000 plus 8,500) for the period 2011 - 2026.

According to the **Table of Annual Delivery Rates and Requirements** published in the **February 2013 JCS Submission Document** the total number of housing completions planned for in the strategy over the plan period 2001 – 2026 is 48,895 (made up of past completions totalling 11,840, commitments of 14,090 and minimum new allocations of 22,965).

By the end of the 2010/11 monitoring period completions should have totalled 16,856 but delivery fell below target levels in 2008/09, 2009/10 and 2010/11 and the actual number of completions for those years was 4141 houses for the GNDP area as a whole (**Source Table 7 – Objective 2 Indicators - GNDP Annual Monitoring Report 2010-11**).

Therefore at the end of the 2010/11 monitoring period actual completions totalled 15,981 (11,840 past completions plus 4141 completions 2008 -11) and so 32,914 new completions were still needed in the 15 year period 2011/12 to 2025/2026 in order to comply with the overall cumulative completions target i.e. 32,914 plus 15,981 = 48,895.

Comparing this JCS plan requirement for 32,914 new homes (2011-2026) with the housing requirement assessed for the same period based on Household Interim Projection figures (of 25,500 houses) the JCS requirement exceeds the number derived from the Household Interim Projections by 7414 houses (32,914 – 25,500).

Furthermore the core strategy assumes there will be an additional significant level of “Windfall” development which will be permitted within the plan. This is assumed to provide an extra 4,875 houses by 2026. Therefore the gap between actual need (as assessed from the Household Interim Projection figures) and GNDP target numbers widens to 12,289 houses (7414 + 4875).

When one considers the wording on the Annual Delivery Rates Table with respect to new allocations i.e. that they are the **“minimum to be made in identified growth locations”** then of course the GNDP is actually allowing for a situation where housing numbers could exceed target levels – the excess of supply over need would widen even further.

In this context it is important that the GNDP clarify whether the planning permissions granted to developers who have managed to secure approval through exploiting the 5 year land supply loophole count towards the housing targets or represent additional new housing numbers. If they do the excess of supply grows even larger.

As a footnote to this analysis the Household Interim Projections (2011-2021) reveal that the average household size in the GNDP area is noticeably less than the average for England. The figures are given below:

	Broadland	South Norfolk	Norwich	England
Average household size in 2011	2.30	2.31	2.12	2.36
Projected average household size 2021	2.27	2.30	2.12	2.33

N.B. the impact of changes to average household size on the growth in the number of households 2011 – 2021 has been allowed for in the Interim Projections that we have used to assess housing needs

If household size averages in South Norfolk, Broadland and especially Norwich (where average household size is considerably below the average for England) were to move towards the English average this would of course reduce the demand for housing and the excess of JCS housing supply over demand would grow to an even higher level.

It is also worth noting that although developers often cite reductions in average household size as a reason to build more houses the trend towards lower averages does “bottom out” eventually and already appears to have done so in Norwich. Incidentally in Cambridge average household size is predicted to increase from its 2011 level of 2.30, to 2.33 in 2021.

In conclusion the GNDP could reduce its overall housing target, including allowing a pro rata reduction for the section of the NPA that is located in Broadland, by a total of around 12,200 dwellings and still cater adequately for the projected increase in the number of households in the area according to the most recent statistics provided by Department for Communities and Local Government in its Household interim projections.

5) The GNDP is facilitating an excessive level of housing growth which will prompt a housing supply led population expansion

The JCS envisages a population expansion of 50,000 people in the NPA by 2025. Providing a copious supply of new housing at prices that are considerably less than for equivalent homes in the South East will attract a higher level of inward migration than would otherwise occur if local housing delivery was not controlled by a plan that placed so much emphasis on growth and development. As already stated the evidence base for such an expansive plan is flawed.

CPRE considers that such a high level of growth is likely to transform the Norwich area in to a clone of the Home Counties.

If the GNDP placed greater importance on maintaining the features which make the Norwich area so special rather than setting housing targets that will destroy the setting of Norwich as a county town surrounded by attractive countryside then it could have taken up the offer made by Mr Pickles, shortly after the last General Election, which would have potentially allowed for a lowering of the housing targets.

Conclusions

Even when allowing for the anticipated growth that is likely in the number of households in the area (and the figures for this growth take account of all the factors in play i.e. migration, births, deaths and changes in average household size) the GNDP/JCS plans will deliver an excess supply of over 12,200 houses by 2026.

There is therefore scope for a revision of housing targets downwards to a level which equates to current market levels of demand and at least equalling a 12,000 reduction in total. This would prevent the gap between planned completions and actual completions growing ever wider – a trend that is clearly exemplified in recent Annual Monitoring Reports.

Of course even greater reductions would be possible (and desirable) if the GNDP adopted a less expansionist approach and prioritised the special qualities of the local environment and the needs of the local population above its desire for what is seen by many as “growth at all costs”.

National Government would also need to play its part if the issue of the impact of population growth on the beauty and tranquillity of the countryside is to be properly tackled.

A much reduced overall housing target for the GNDP area is compatible with the need to provide the necessary amount of new housing to satisfy local needs – including a sufficient amount of affordable housing. In order to achieve the latter the building of affordable homes would have to be freed from its current “tie-in” to inflated total housing targets. The delivery of affordable housing should be treated as a stand alone social housing needs provision.

If the GNDP reduced its inflated housing targets this would also reduce the shortfall in terms of 5 year land supply requirements and its three local planning authorities would not be “held to ransom” by developers as often as is presently the case.

If the housing targets are not reduced and the JCS unfolds as planned an additional 53,770 houses will be built within the GNDP territory between 2001 and 2026 (48,895 plus 4,875 “windfalls”).

To put this level of urban growth in perspective there are currently just over 60,000 dwellings (including flats in apartment blocks) in the Norwich City Council area. A quarter of a century of rapid expansion on the scale envisaged in the JCS will create an elongated urban sprawl from Rackheath in the north east to Wymondham in the south east. This is certainly incompatible with the core objectives of CPRE / Norfolk.

David Hook – Chairman CPRE Planning Group
7th May, 2013



Policy Statement:

The Greater Norwich Development Partnership's Joint Core Strategy

Background

The Greater Norwich Development Partnership (GNDP), consisting of Broadland and South Norfolk District Councils, Norwich City Council and Norfolk County Council, has produced a Joint Core Strategy (JCS) which aims to promote major growth in the period up to 2026. It includes proposals for 37,000 new houses. The majority of these, around 33,000, are to be built in the Norwich Policy Area bringing a population increase of around 50,000 people. 10,000 houses are planned for a growth triangle north east of Norwich; Long Stratton is due to become a town the size of Diss and Wymondham and Hethersett will have to accommodate at least an additional 3,200 houses.

Key Points

- 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.
- 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.
- The only way to effectively protect the countryside around Norwich is to lower the growth targets. A recent GNDP monitoring report revealed that new housing delivery has fallen well below the strategy's target levels and that this trend is likely to continue until at least 2017. We welcome these findings and urge the GNDP to reduce considerably its overall target for new house building up to 2026.

What CPRE Norfolk is campaigning for:

- **Lower projected housing targets:** CPRE fully supports the provision of an adequate level of new housing to satisfy local demand. However these needs do not justify a housing target as high as 37,000. They can be met with a much lower number than this. The total number of applicants on the housing registers of Broadland, Norwich and South Norfolk councils is approximately 14,000 but only around 30% are defined as inadequately housed - just over

4,000. League tables provided by Shelter show that these councils are in total currently providing a more than adequate supply of affordable houses. The reality is the JCS is not about local housing need. The GNDP has admitted it is a plan based on inward migration. The 33,000 extra houses planned for the Norwich Policy Area are mainly to facilitate a population expansion of 50,000 people.

- **Re-use of empty housing:** There are currently 1,470 empty properties within the territory of the 3 GNDP authorities. If these homes were brought into use this could help reduce the target for the number of new houses needed.

- **'Brownfield first' approach:** Damage to the countryside should be minimised through the strict prioritisation of 'Brownfield' sites for new development before Greenfield sites are considered.

How you can help

You can join us in our campaign to prevent urban sprawl spreading from Rackheath to Wymondham, and support our efforts to reduce housing targets by:

- writing to your MP and your local council highlighting these issues
- responding to local council consultations on planning proposals
- becoming a member of CPRE Norfolk

Feb 2012

The Norfolk branch of the Campaign to Protect Rural England (CPRE Norfolk) exists to promote the beauty, tranquillity and diversity of rural Norfolk by encouraging the sustainable use of land and other natural resources in town and country. As an independent voice for the landscape, we engage with local and regional planning systems and campaign locally for positive solutions that will support the long-term future of Norfolk - one of England's most rural areas.

**CPRE Norfolk, Cardinal House, 86 St. Benedict's Street, Norwich, NR2 4AB
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The Campaign to Protect Rural England (CPRE) is dedicated to protecting the beauty, tranquillity and diversity of our countryside. We are a powerful combination of effective local action and strong national campaigning, backed by tens of thousands of supporters across England.

CPRE Norfolk is a county branch of CPRE and a separate registered charity, no. 210706. Visit our website www.cprenorfolk.org.uk for more information about the work of CPRE Norfolk or to join as a member. If you would like to receive regular copies of our newsletter and invitations to local events, please let us know.