

# Greater Norwich Development Partnership

## Topic Paper: Homes and Housing

Joint Core Strategy for Broadland, Norwich and South Norfolk  
November 2009

Jobs, homes, prosperity for local people



**NORWICH**  
City Council



**Norfolk** County Council



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1. Housing trajectory



# 1. Summary

- 1.1 This topic paper is one of a series, which explains how key aspects of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk were developed. It deals specifically with the formulation of the JCS policy on Housing Delivery. The policy gives a broad overall housing figure for the three Districts and the Norwich Policy Area. It also presents further policy regarding “Housing Mix”, “Affordable Housing”, “Housing with Care” and “Gypsies and Travellers”. There are also close links with other policies in the JCS such as those that deal with the distribution of housing development, including the large-scale growth locations and the settlement hierarchy.
- 1.2 This topic paper will look at the relevant national, regional and local guidance that underlie the JCS. It will also examine the process by which the policy has developed into its present form, including what information and evidence has informed the decision making process and what choices had to be made in the formulation of the policy.
- 1.3 The main areas covered by this topic paper are:
  - Housing requirement 2001 – 2026 (numbers from East of England Plan (EEP), projected forward to 2026)
  - The need for an appropriate housing mix
  - Affordable housing, including thresholds and ‘exceptions’ sites
  - The need to provide for mixed tenure housing with care
  - Gypsy and Traveller sites (transit and permanent) and Travelling Showpeople

# 2. Purpose of this paper

- 2.1 The main issues relating to homes and housing are:
  - Housing supply has been generally strong, meeting the former Norfolk Structure Plan requirements, but the EEP requires a significant increase in delivery
  - Not currently meeting the needs for affordable housing, particularly the high need arising within the city
  - Needs of an ageing population, particularly outside of the city
  - High proportion of flats/non family housing in and around the city centre
  - Poor income to house price ratio
  - Lack of authorised Gypsy and Traveller sites (permanent and transit sites).
- 2.2 In working towards a JCS the Greater Norwich Development Partnership (GNDP) has commissioned or is undertaking a number of pieces of research. The ones with particular relevance to housing are

mentioned below. The list below also includes other documents of relevance not actually commissioned by the GNPD:

- **Evidence Base for a Housing Market Assessment: A Study of Housing need and Stock Condition (2006).** This is a housing requirement study undertaken for the Greater Norwich area by Opinion Research Services (ORS). This looks at a number of aspects of housing including the definition of Market Areas, the condition of the stock, the issue of affordability and sets out future housing requirements in terms of size and tenure. In terms of the spatial planning of the area, the definition of market areas and the affordability of housing in the area (or housing need) are critical.
- **Greater Norwich Housing Market Assessment Study (2007).** This builds on the ORS study and looks at how local housing markets in the area operate, what are the key factors driving changes in housing markets and how we can keep track of changing conditions by updating our understanding of the housing market.
- **Greater Norwich Housing Strategy (2008).** This strategy summarises the main issues that affect housing in Greater Norwich and sets out how the Greater Norwich Housing Partnership will work together and with others to deliver the vision set out in the strategy.
- **Strategic Housing Land Availability Assessment (SHLAA).** This study is being produced by the three local authorities following recent Government guidance. The main purpose of the assessment is to demonstrate that the Greater Norwich Partnership can accommodate the numbers of houses needed in appropriate locations. The SHLAA will be subject to a process of regular review.
- **Annual Monitoring Reports.** These are individually produced by the three local authorities. These include assessments of housing delivery under prevailing policies as well as housing trajectories forecasting future delivery. These have been combined into a composite trajectory covering the entire Greater Norwich Area.
- **Gypsy and Traveller Accommodation Needs Survey (2006).** This document gives an indicator of the needs and preferences of Gypsies and Travellers in terms of the number of pitches required, possible locations, types and size of site. The survey fed into the single issue review of the East of England Plan on Gypsy and Travellers (discussed later in the topic paper).

2.3 South Norfolk Council has been preparing a separate Development Plan Document (DPD) aimed at addressing the needs of Gypsies and

Travellers in the area. This document has been subject to a Regulation 25 public consultation and a report was presented to South Norfolk Council Cabinet in June 2009 recommending which sites should be progressed to the Regulation 27 pre-submission draft of the document. Broadland and Norwich have not followed a similar path, although Broadland have undertaken work to quantify the need for pitches in their district, which also fed into the East of England Plan single issue review on Gypsy and Travellers.

- 2.4 The Joint Core Strategy also needs to take into account the Sustainable Community Plans that cover the area. There are Local Strategic Partnerships covering each of the three local authority areas concerned all of which have adopted, or are preparing, Sustainable Community Plans which articulate the priorities of the people of the area.
- 2.5 The objectives of all Sustainable Community Plans have been used to form a spatial vision for the JCS, plus more detailed spatial objectives that set out how we would like to see the area at the end of the plan period. Objective 6 – to allocate enough land for housing and affordable housing is the one most relevant to this topic paper.

### 3. Background

#### **National Policy**

##### **Planning Policy Statement 3 - Housing**

- 3.1 The Government published Planning Policy Statement 3 – Housing in November 2006 as a response to Kate Barker's report "Delivering Stability, Securing our Future Housing Needs" (2004). The affordability of housing had become a national issue and in her report Ms Barker raised a number of questions about how the planning system interacts with the market to bring about new housing.
- 3.2 The main issues of relevance raised in PPS 3 are:
  - The requirement for planning authorities to look at least 15 years ahead from the forecast date of adoption. In the case of the Greater Norwich area this means planning for enough houses for the period up to 2026 rather than the 2021 horizon set by the East of England Plan.
  - An increased emphasis on delivery, with a requirement that Local Planning Authorities can demonstrate robustly a supply of sites ideally covering the whole 15-year period. "Deliverable" sites should be identified for years 1-5 and "developable" sites for years 6-10 and, ideally years 11-15, or where this is not possible, broad locations identified for years 11-15. There is a clear implication in PPS3 that the inability to do this could result in appeals being allowed on unallocated land.

- PPS3 also updates Government guidance on how the planning system should contribute to affordable housing through planning obligations. The Government's consultation on a Community Infrastructure Levy system suggests that affordable housing contributions should still be sought directly from the developer on a site-by-site basis on suitable sites.
- A continued emphasis on prioritising well-located brownfield land
- Less prescriptive guidance on densities but still recommending making effective use of land allocated for development. In seeking high densities where appropriate, we can minimise the amount of Greenfield land we need to allocate.
- Continued encouragement for local planning authorities to allow local needs housing on sites where housing would otherwise not be acceptable in smaller villages through an 'exceptions' policy. Recent Government guidance has permitted the allocation in advance of such sites if local authorities want to take that approach.
- In forecasting the future supply of housing, PPS3 states that planning authorities should not make any allowances for windfalls beyond the current stock of planning permissions.
- Emphasis on the contribution of high-quality design to development of sustainable, mixed communities and ensuring reductions in CO2 emissions (an issue which is picked up in other policies in the JCS).

### **Other relevant national guidance**

3.3 The following guidance is of relevance to the topic of housing:

#### **Strategic Housing Market Assessments Practice Guidance (August 2007)**

3.4 This document sets out a framework that Local Authorities and regional bodies can follow to develop a good understanding of how housing markets operate.

#### **Gypsy and Traveller Accommodation Needs Assessments Guidance (October 2007)**

3.5 This document provides advice on carrying out an assessment of the accommodation needs of Gypsies and Travellers

#### **Wanless Social Care Review: Housing Options for Older People (2006)**

3.6 The Government is encouraging extra care housing as a key element in extending the housing with care choices of older people. (In Norfolk extra care housing is known as housing with care). In 2005, Stephen Ladyman, Community Health Minister considered extra care housing rather than care homes or sheltered accommodation as the 'dominant model' for older peoples accommodation over the next generation. There has been commitment of £240m of funding from the Department of Health and the former Housing Corporation for development of housing with care since 2004.



### **Relevant Public Service Agreements (PSAs)**

- 3.7 Public Service Agreements are produced to set out the key priority outcomes that the Government wants to achieve in the period 2008-2011. The ones of most relevance to housing are:
- PSA 17: Tackle poverty and promote greater independence in later life with an indicator to support over 65's to live independently
  - PSA 18: Promote Better Health and well being for all
  - PSA 20: Increasing long term housing supply and affordability

### **Regional Policy**

#### **East of England Plan (May 2008) (The Revision to the Regional Spatial Strategy for the East of England)**

- 3.8 The Joint Core Strategy has to meet the requirements of the Government's East of England Plan (EEP). This document sets out planning matters that need to be dealt with in more detail at a local level. It particularly specifies the number of new homes and jobs that must be provided in the area up to 2021. The EEP was adopted in May 2008 but is already being reviewed. This review is due to be completed by 2011 and will look ahead to 2031, taking account of updated household forecasts.

- 3.9 Policies of particular relevance to housing are:

#### ***Policy H1: Regional Housing Provision 2001-2021***

- 3.10 Policy H1 states that Local Planning Authorities should plan for delivery of housing for at least 15 years from the date of adoption of the relevant development plan documents assuming that annual rates of provision after 2021 will be the higher of the two rates detailed in the policy; either the 2001-2021 rate, or as is the case for the GNDP area, the 2006-2021 rate.
- 3.11 The policy also states that Local Planning Authorities should take account of the following when planning for housing in their area:
- The spatial strategy in the EEP
  - The need for consistency of approach between neighbouring authorities
  - Coordination with necessary transport and other infrastructure providers.
- 3.12 Policy H1 sets housing provision figures by Local Planning Authority area but to reflect the nature of the Greater Norwich Development Partnership area it makes it clear that the District totals for Norwich, Broadland and South Norfolk are indicative only and may be varied by mutual agreement as long as the overall total is 37,500. Policies H1 and NR1 (see below) also make it clear that 33,000 of these houses

should be provided within the Norwich Policy Area (NPA), which broadly equates to the built up area of Norwich and the first ring of larger villages, plus Wymondham.

***Policy H2: Affordable Housing***

3.13 Policy H2 states that within the housing requirement set out under policy H1, Local Planning Authorities should set appropriate targets for affordable housing taking the following into account:

- The objectives of RSS
- Local assessments of affordable housing need, as part of strategic housing market assessments
- The need where appropriate to set specific, separate targets for social rented and intermediate housing
- Evidence of affordability pressures
- The Regional Housing Strategy

3.14 The policy states that delivery should be monitored against a 35% target at a regional level although local targets of more than 35% may be justified in certain areas.

***Policy H3: Provision for Gypsies and Travellers***

3.15 The EEP states that there is an urgent need to address the shortage of Gypsy and Traveller sites in the East of England and the problems that this creates. Policy H3 states that Local Planning Authorities should make provision for sites/pitches to meet the needs of Gypsies and Travellers in their areas.

3.16 Reflecting guidance in ODPM Circular 1/2006 EERA submitted a single issue revision to the RSS In February 2008. Following an Examination in Public the final document was published in July 2009 and is entitled 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England – A Revision to the Regional Spatial Strategy for the East of England'. The policy sets out how many pitches and plots are needed in each authority in the East of England to provide enough authorised pitches until 2011, with a formula to extrapolate residential pitches beyond that date. The policy has been developed to achieve a wider distribution of pitch provision to meet the levels of need for more accommodation avoiding over-concentration in a few locations, and to provide greater choice for the Gypsy and Traveller community.

3.17 Also of some relevance to the provision of housing is:

***Policy NR1: Norwich Key Centre for Development and Change***

In line with the requirement for at least 33,000 new homes to be located in the NPA, Policy NR1 stresses:

- The need to shift emphasis towards accessibility by public transport as far as possible
- Norwich's pre-eminent role as a centre of culture, retail and entertainment

- The promotion of tourism
- The need to address deprivation

This policy also identifies strategic locations for employment but offers no corresponding guidance on housing.

## 4. What has informed us

### **Overall housing provision**

- 4.1 The overall housing provision figure (including the Norwich Policy Area split), has been informed by the East of England Plan (EEP) (see above). The EEP sets out housing targets to 2021 but also reflects guidance in PPS3 by setting out the need to plan for delivery of housing for at least 15 years from the date of adoption of the relevant development plan documents. It also includes a formula that has been used to calculate the 15 year requirement for the JCS. The JCS therefore looks ahead to 2026 to meet the requirements of the EEP and PPS 3.
- 4.2 The calculation of the amount of housing for which land needs to be allocated is based on housing monitoring information provided by the three districts regarding the number of houses already built or committed at 31<sup>st</sup> March 2008. The extent to which the delivery of housing is meeting requirements will be monitored using housing trajectories for the three Districts and the NPA and it is a requirement for local authorities to demonstrate a 5-year supply of deliverable and developable housing land. Housing trajectories for the whole Greater Norwich area and the Norwich Policy Area are included as Appendix 1.
- 4.3 The Strategic Housing Land Availability Assessment (SHLAA) is also an important document, which demonstrates that there is sufficient deliverable and developable land available to meet housing requirements. In particular, the SHLAA is important for demonstrating the realistic capacity of Norwich to accommodate housing and thus minimise the need for greenfield development outside the city.
- 4.4 The JCS tries to maximise the level of development on previously developed land (PDL), however evidence has shown that the opportunity for new allocations on PDL are limited. Based on monitoring information the proportion of current commitments on PDL is approximately 42% whereas the potential for making allocations on PDL is only about 20%. The JCS has used these figures and suggests that when added to existing commitments the proportion of total housing development on PDL is likely to be between 25% and 30%.
- ### **Housing Mix**
- 4.5 PPS 3 requires the timely delivery of housing and promotes a mix of types, sizes, tenures etc. to meet the needs of the community, both

existing and future. It also promotes the efficient and effective use of land by maximising densities and the use of PDL where appropriate.

- 4.6 As stated in the Housing Delivery policy the Housing Market Assessment sets out the required mix of property types and sizes, as well as identifying the needs of specific groups such as key workers, supported housing, the elderly and families. Issues include the growth of single person non-pensioner households in Norwich.
- 4.7 “More Choice, Greater Voice – a toolkit for producing a strategy for accommodation with care for older people” published by the Housing, Learning and Improvement Network (February 2008) states that ‘...Unless providers are willing to offer genuinely mixed tenure schemes in which social renters and home owners live side by side they will contribute to rather than dilute the emergence of a two class old age’.

#### **Affordable Housing**

- 4.8 The EEP has a regional target for 35% of all housing to be affordable, although it does recognise that higher targets may be required locally. The most recent housing needs assessment (Housing Market Assessment: A Study of Housing Need and Stock Condition, ORS, June 2006) indicates that 43% of overall housing need can only be met by affordable housing. Experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions. Therefore this 40% figure has been used in the JCS, although it is recognised that a degree of flexibility needs to be incorporated, consequently some sites will require an element of public subsidy or in particular circumstances provide a lower level of affordable housing or make an off site contribution.
- 4.9 PPS 3 sets a national indicative threshold of 15 units above which an element of affordable housing should be sought. Various options of different thresholds were presented as part of the Issues and Options consultation on the JCS. Although there was support for measures to graduate the percentage contributions for smaller sites, 40% of respondents felt that developer contributions should be sought for developments greater than 5 dwellings. The 5 dwelling threshold has been applied in the Housing Delivery policy because it was felt that a large amount of residential development is likely to take place on smaller sites and if the PPS 3 threshold of 15 dwellings were to be applied then a significant undersupply of affordable dwellings would result, particularly in areas away from the main housing allocations.
- 4.10 The policy also provides scope for ‘exceptions’ housing schemes to come forward on sites in settlements that would not normally be released for housing, provided there is an identified need. As part of the Issues and Options consultation questions were asked about whether specific sites should be allocated for affordable housing in rural areas. Respondents did not support this idea and the policy

therefore allows for such sites to come forward when the need arises. The supporting text does however also provide the opportunity for local authorities to allocate sites in site specific documents if desired in accordance with Government Guidance. The Issues and Options consultation gave an option to allocate exceptions sites in all villages, but this was rejected principally on Sustainability Appraisal grounds, limiting such allocations to 'Other Villages' and above.

### **Housing with Care**

- 4.11 The Government sees housing with care as a key element in extending the care choice for older people. A fact sheet prepared by the Housing, Learning and Improvement Network entitled "Extra Care Housing – what is it?" suggests that extra care housing can enable most older people to continue to self care and enjoy their independence. In many cases it offers people the opportunity to continue to live independently and have the same privacy they would have in any other kind of housing but with access to other services and facilities that help them. Much depends on people's individual preferences and extra care has to be seen as one of the choices available to people. It is often a preferable choice to residential care. (Source: [http://www.dhcarenetworks.org.uk/\\_library/Resources/Housing/Housing\\_advice/Extra\\_Care\\_Housing\\_-\\_What\\_is\\_it.pdf](http://www.dhcarenetworks.org.uk/_library/Resources/Housing/Housing_advice/Extra_Care_Housing_-_What_is_it.pdf) )
- 4.12 At a local level findings from Norfolk County Councils 'More Choices, Better Choices' consultation carried out in 2008 showed;
- 98.4% think it important to have a choice of where to live, housing with care or care home;
  - 85.9% think it important to have an opportunity to move in with their partner;
  - 43.3 % think it important to have the opportunity to buy their flat and 35.8% think it neither important nor unimportant; and
  - 85.0% would choose to move to housing with care if they needed to move into a care setting.
- (Source: <http://www.consultationfinder.com/norfolk/uploaddocs/Consult864/Report%20on%20the%20findings%20from%20the%20consultation.doc>)
- 4.13 In September 2008 a report was taken to the Norfolk County Council Adult Social Services Review Panel entitled 'Strategic Model of Care – Care Homes; Strategic commissioning proposals for the future of services'. This report was then considered by a meeting of the Greater Norwich Housing Partnership in January 2009 where an update on the JCS was also given. This prompted a meeting between Adult Social Services and the GNDP to ensure that housing with care was incorporated into the JCS.
- 4.14 Norfolk County Council Adult Social Services have indicated that in excess of 500 housing with care dwellings (also known as extra care housing) will be required across the area by 2026. Developments will need to be of mixed tenure and located in highly accessible locations

so that residents can access local services and the older population in the surrounding area can access the services provided within the Housing with Care scheme. This need is reflected in the Housing Delivery policy.

- 4.15 In their consultation response Adult Social Services also highlighted the need for an expansion of care home provision, including those specialising in dementia care and care homes with nursing places, suggesting that 1,000 additional places will be required by 2026. This requirement is included under the Supporting Communities policy in the JCS.

### **Gypsies and Travellers**

- 4.16 ODPM/CLG Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Show people sets out the requirement to meet identified needs. More locally there is the Accommodation Needs Survey of Gypsies and Travellers in Norfolk (2006).
- 4.17 The Issues and Options consultation recognised the importance of addressing the needs of Gypsies and Travellers and Travelling Showpeople. It used work undertaken for the East of England Regional Assembly (EERA) and suggested a need for a number of pitches across the three Districts, not including transit sites. This EERA work has now been adopted as a revision to the Regional Spatial Strategy for the East of England. As a response to a submission from the Friends and Families of Travellers to the Regulation 25 public consultation the residential pitch target in the policy has been extrapolated to 2026 using a formula given in the EEP revision.
- 4.18 The Issues and Options consultation posed various questions related to gypsies and travellers such as:
- Whether there are any particular highway corridors where the search for transit sites should be focused?
  - Whether in the longer term an element of land for long stay Gypsy and Traveller sites should be included in each new development?
  - Should a larger number of small sites (up to 15 pitches) be developed rather than fewer larger sites in large new developments?
  - What provision should be made for Travelling Showpeople?
- 4.19 Respondents to the Issues and Options consultation supported provision of transit sites on the main A11 and A47 routes but commented on the need to consult the Gypsy and Traveller community. The Sustainability Appraisal of the Issues and Options illustrated that there was a major short term advantage to providing sites within the suggested corridors to reduce the stress related to unauthorised and temporary sites. In response to the Regulation 25 public consultation the Friends and Families of Travellers commented that the locational

criteria listed in the policy are inappropriate to residential pitches. In response to this the wording of the policy has been changed to relate specified road corridors to transit sites only and not residential sites.

- 4.20 The Sustainability Appraisal of the Issues and Options supported the location of Gypsy and Traveller sites in larger development as offering the best opportunity for long term integration/creation of balanced communities with associated benefits of good access, reduced travel and healthier lifestyles.
- 4.21 However the Issues and Options consultation highlighted opposition to this proposal with respondents suggesting that contributions from developers could be used to provide sites outside these areas. In response to representations received to the Regulation 25 public consultation the final policy reflects the findings of the Sustainability Appraisal by stating that some sites are expected to be provided in association with large scale strategic housing growth and that all major development proposals must consider the potential for Gypsy and Traveller pitch provision.
- 4.22 In relation to site size there was more support in the Issues and Options consultation for a larger number of small sites rather than fewer larger sites. This was supported by the Sustainability Appraisal, which stated that a larger number of small sites offered the best opportunity to create balanced/integrated communities in the long term. Smaller sites could be better integrated into the landscape and place less strain on local services. The policy in the Regulation 25 consultation reflected this by stating that individual sites will contain no more than 12 pitches. As a response to a representation by the Friends and Families of Travellers to the Regulation 25 public consultation the pitch size in the policy has been further amended to 10 to 12 pitches in order to meet the preferences of the Gypsy and Traveller community.

## 5. Choices

- 5.1 **Percentage of affordable housing** – 40% is a balance between the absolute need (which the ORS study has shown to be 43% of new development, but which is higher still when taking into account existing sites that will deliver a lower percentage/fall below threshold sizes etc.) and what has been shown to be deliverable (without subsidy) in Broadland and tested through the Broadland Local Plan process.
- 5.2 **Affordable housing threshold** – could have used PPS 15 units, but 5 units reflects the need to capture an affordable housing contribution across a range of sites/location including smaller infill plots with Norwich and other built up areas, an in smaller rural settlements –

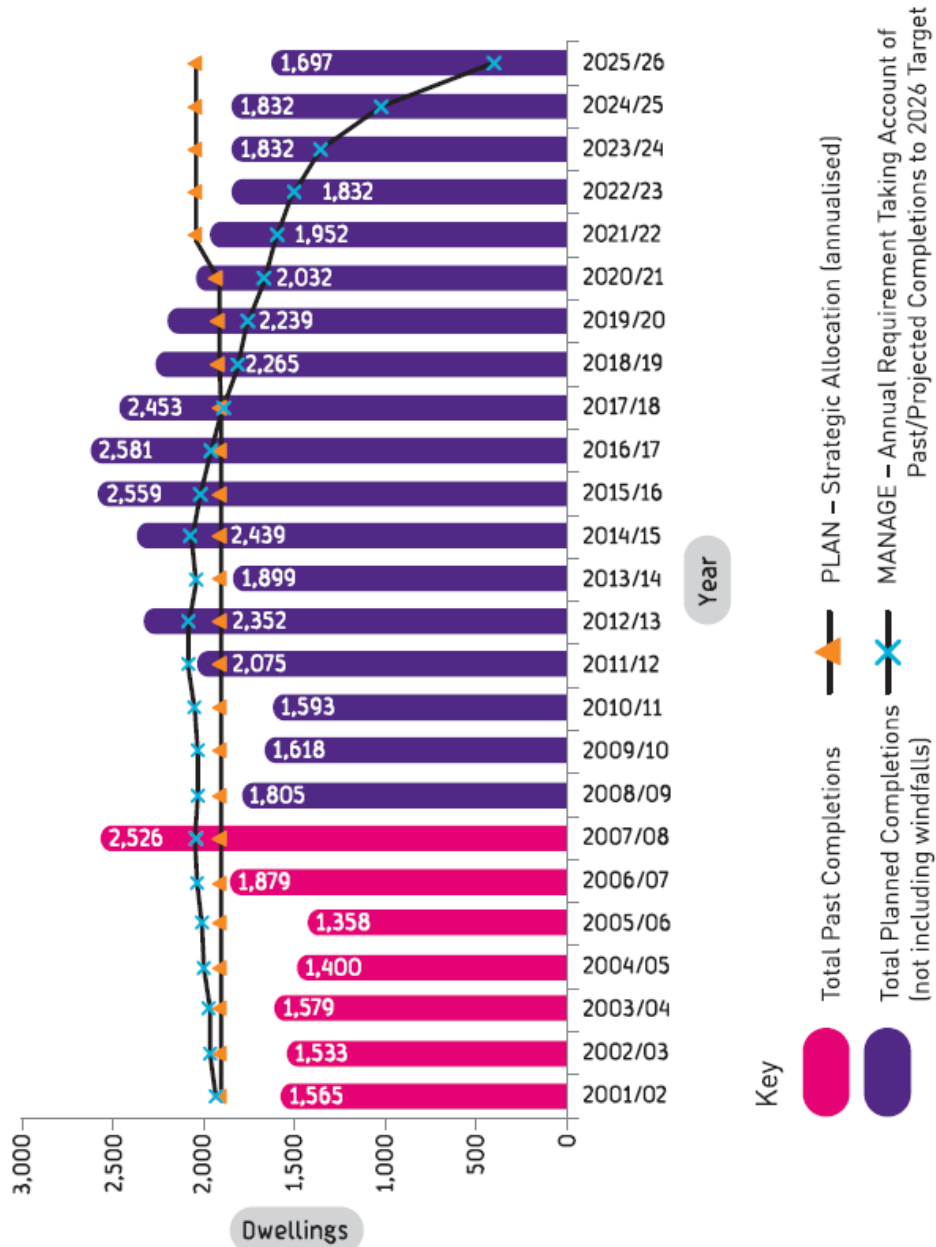
overall aim to create balanced/mixed communities, rather than concentrating affordable housing in just larger developments.

- 5.3 **Gypsy and Traveller distribution of pitches** – could have planned for fewer larger sites as part of new developments but the policy is deliberately broader than that to reflect public opinion for a greater number of smaller sites (i.e. fewer large sites or more smaller sites)

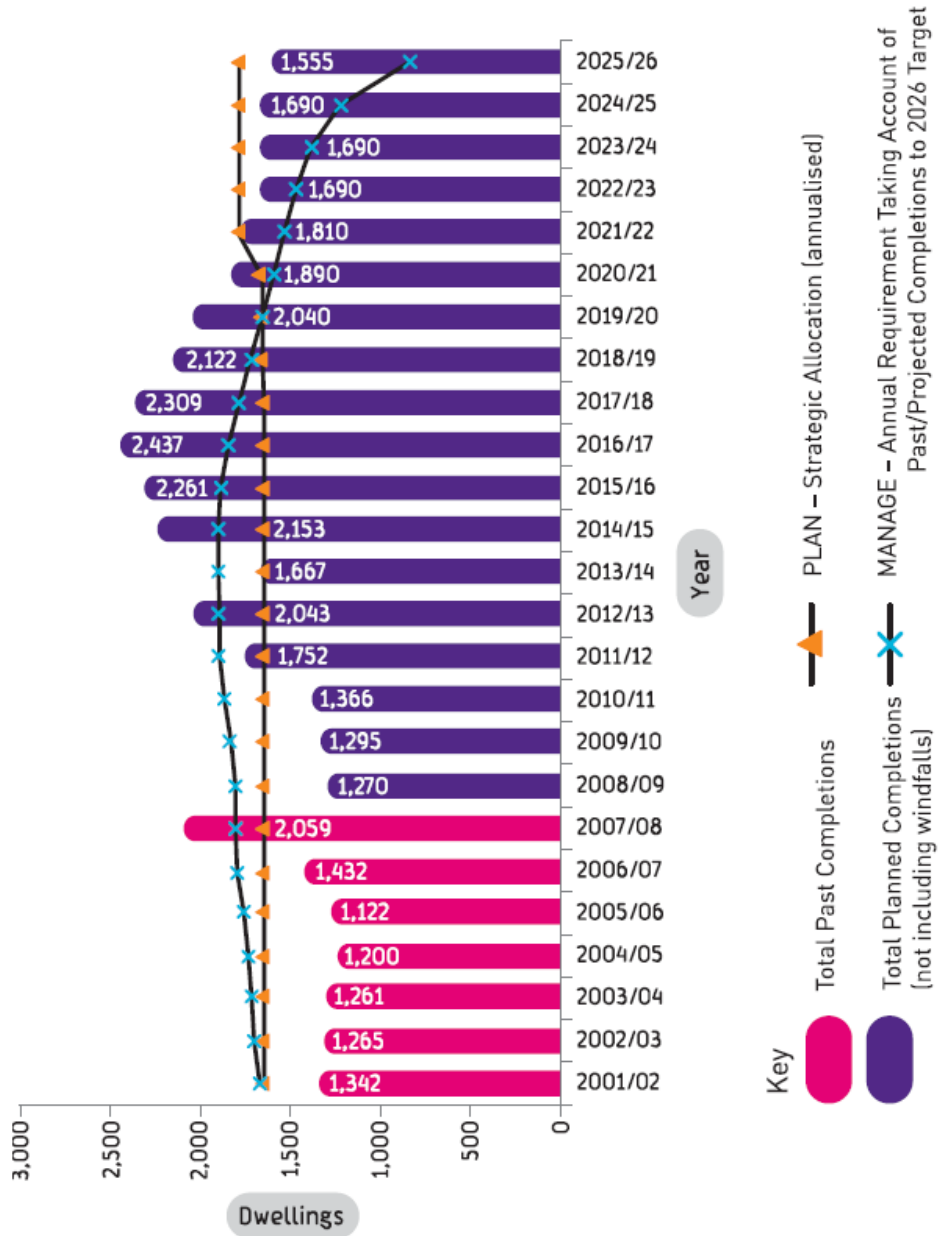


## Appendix 1: Housing trajectory

### GNDP housing trajectory – plan and manage 2001-2026



## Norwich Policy Area housing trajectory - plan and manage 2001-2026





For more information or if you  
require this document in another  
format or language, please phone:

**01603 431133**

for Broadland District Council

**0344 980 3333**

for Norwich City Council

**01508 533805**

for South Norfolk Council

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Joint Core Strategy for Broadland, Norwich and South Norfolk  
November 2009

