EXAMINATION OF GNDP JCS. MATTER 1B/3A. JCS OVERALL GROWTH IN THE NORWICH POLICY AREA. Concluding comments by CPRE Norfolk.

The GNDP do not in any of their documents numerically relate their proposals for housing growth numbers against completions in the period 2001-2008, a time of economic growth, and an outlook and expectations very different from what we are faced with now. This is best done by calculating and comparing the average annual completions for the NPA as a whole, and within this how the three districts compare. We do this by first looking at the number of completions for the period 2001-2008, and the number for the period 200-2026 by summing existing commitments and the proposed new allocations, see Table 1 below.

Table 1. NPA Housing requirement by district, GNDP Policy 4

	Completions 2001-2008	Commitments 2008-2026	New allocations 2008-2026	Com + New 2008-2026
Broadland NPA	1,347	2,099	9,000	11,099
Norwich	5,484	5,592	3,000	8,592
South Norfolk NPA	2,850	4,156	9,000	13,156
Total	9,681	11,847	21,000	32,847

Table 1 illustrates the different pattern between Norwich, and Broadland and South Norfolk NPAs, resulting from the proposed numbers of new allocations. Table 2 makes a comparison of the average annual build rate for the period 2001-2008 with that proposed for 2008-2026, and shows a striking difference between Broadland and South Norfolk on one hand, and Norwich on the other.

Table 2. NPA Average Annual Completions: 2001-2008, 2008-2026 proposed

	2001-2008	2008-2026	Change	% Change
Broadland NPA	192	617	+425	221%
Norwich	783	447	-306	-39%
South Norfolk NPA	407	731	+324	80%
Total	1,383	1,825	+442	32%

The overall increase in average annual completions of 32% lacks credibility, both against the build rate with the very different economic background of the 2001-2008, and the infrastructure requirements now set out in RF26. When looked at by district, it shows that a significant fall in Norwich would be compensated by massive increases in the Broadland and South Norfolk NPA. While Norwich faces relatively little in the way of infrastructure constraints, there are very high demands for Broadland and South Norfolk, most marked in the north east sector.

Impact of Housing Density in Norwich

Paragraph 11.3 in EiP70 is helpful on housing density. It points out that the SHLAA assumed density of development would be 100 dwellings per hectare in the city centre and 50 in the rest of the city. The minimum density in the City of Norwich Local Plan is 40dph and this is the figure Norwich City Council is proposing to take through the LDF. The Sites Allocation Plan for Norwich is yet to surface.

The average densities for the city as a whole were about 90dph between 2007 and 2010. The question arises, for a given set of specific site proposals for Norwich, how is the yield in housing units calculated. If a 3,000 unit figure is used, and an assumption that average site density would be 40dph, then if in fact 90dph were achieved, the yield would be 6,750 dwellings. Looked at in another way, 3,000 dwellings on an assumption of 40dph, would become 5,000 dwellings if the density worked out at 66dph.

Level and Distribution of Growth in the Norwich Policy Area

The location of housing growth has to be assessed by taking account of the major employment centres, the minimisation of new infrastructure demands, and the potential for linking with efficient public transport facilities. Taking a judgement based on the above and issues discussed at the hearings, CPRE would propose indicative figures for growth and the new allocations for the period 2008-2026 as (compare GNDP in Policy 9):

Norwich City Council: 5,000 dwellings (3,000)
Broadland smaller sites in the NPA: 400 dwellings (2,000)
South Norfolk smaller sites in the NPA: 400 dwellings (1,800)
North-east urban fringe: up to 3,200 dwellings (7,000)
Easton/Costessey: 1,500 dwellings (1,000)
Cringleford: 1,200 dwellings (1,200)
Hethersett: 300 dwellings (1,000)
Long Stratton: 100 dwellings (1,800)
Wymondham: 1,500 dwellings (2,200)

This would give a distribution on new allocations for the NPA of 5,000 for Norwich City Council; 3,600 for Broadland; and 4,900 for South Norfolk; a total 13,500 new allocation against the GNDP figure of 21,000. We have then on a CPRE indicative housing requirement from 2001-2026:

	Completions 01-08	Commitments at 08	New allocations to 08/26	Com/New 08-26
Broadland NPA	1,347	2,099	3,600	5,699
Norwich	5,484	5,592	5,000	10,592
South Norfolk NPA	2,850	4,158	4,900	9,056

Total	9,681	11,847	13,500	25,347

The average annual build rates for 2001-2008, and those projected for 2008-2026 on CPRE figures, and the GNDP of committed plus new of 32,847, are then as shown:

	2001-2008	2008-2026 CPRE	2008-2026 GNDP
Broadland NPA	192	317 (+65%)	617
Norwich	783	588 (-25%)	447
South Norfolk NPA	407	503 (+24%)	731
TOTAL NPA	1,383	1,408 (+2%)	1,825

The conclusions that we draw are as follows:

1. As the Housing Topic Paper EiP 70 states, and the Inspectors concur, forecasting the need for new housing is not an exact science, and the sources of evidence identified seeks to cover a range of needs. However, a key question is also what is achievable and realistic in terms of infrastructure requirements, environmental impact and evidence of the markets ability to deliver (as stated at paragraph 1.3).

2. Given that 2001-2008 showed strong (but unsustainable) growth in this period, particularly the last two years, the rate of annual average completions on the CPRE indicative figures is an ambitious target, but should be more realistic and achievable if there is a return of confidence in the market between now, and say 2015.These figures would require that in the period 2008-2026, the average annual completion of dwellings in the NPA would be slightly greater than achieved in the ‘boom’ period. The trajectory which would fall well below the period average for some years, and then progress to a peak well above the average in the last years to 2026.

3. The average annual completion rate for 2008-2026 on the GNDP 33,000 housing requirement figures is 1,825. This is 32% above that achieved over the period 2001-2008; and we start with completions in 2008/09 and 2009/10 of 1,189 and 945 units respectively (EiP 16, Housing Topic Paper, table at paragraph 5). While it is difficult to forecast ahead, it would seem likely that it will take some years to climb from half of the average annual to a figure which approaches 1,825 dwellings. There is no evidence that one could with any confidence produce to say that at least 33,000 dwellings could be completed between 2008 and 2026, and that the JCS is in any way realistic and achievable in moving from 11,847 commitments and through the 21,000 NPA new allocations that are proposed to achieve the target they have set.

4. Further, as the GNDP state, their overall level of housing growth is ‘*absolutely conditional on the provision of the supporting infrastructure and in particular the Norwich Distributor Road’* (paragraph 5.4, EiP 70).

5. The 5 year Housing Land Supply should be considered through the CPRE indicative figures and a new allocation of 13,500 dwellings for 2008-2026, being in our view a sound proposition rather than an unsound one. Table 5 of EiP 16 estimates a five year supply from 2010/11 to 2014/15 of 6,609 dwellings. An average annual rate (CPRE figure) of 1,408 dwellings per annum over 5 years will supply 7,040 dwellings, thus satisfying the requirement.

EXAMINATION OF GNDP JCS. MATTER 2 AFFORDABLE HOUSING. Concluding comments by CPRE Norfolk

The GNDP at the Inspectors' request, arising from the discussion on Matter 2, produced RF70 to provide information on the funding streams for affordable housing in the recent past, showing the amounts delivered from developer contribution and other sources. The text is most noticeable for showing different targets within the three NPA authorities. The current policy target on qualifying sites is 40% Broadland, 40% for Norwich, and 25% for South Norfolk.

However for the plan area FC3 sets a figure of 33%. EIP70 states (paragraph 6.2) that around 37% of total housing 'is extremely unlikely to be achieved'. In the following paragraph it states that 'if 33% affordable housing could be achieved a total of 38,650 dwellings would be needed to address the projected need'. 'An analysis of the Affordable Housing Viability Study suggests that in **broad terms this overall percentage of contributing development is potentially achievable'**. (our emphasis).

CPRE is not questioning the need for a target, but it should be realistic and sound. The last pages (17-19) provide data for the period 2000-01 to 2009-10, but no analysis or conclusions are provided. In our view, see table below, would show that judged on the evidence for the period, there is no evidence to conclude a target of 33% is even 'potentially' achievable', see Table 3 below.

Table 3. Housing/affordable housing for GNDP districts, 2001-01 to 2009-10

	Total dwellings	Total A/F	A/F 106	A/F mixed source
Broadland	3,218	762 (23.7%)	176 (5.5%)	279 (8.7%)
Norwich	6,410	1,982 (31%)	554 (8.6%)	10 (0.2%)
South Norfolk	5,900	1,279 (21.7%)	535 (9.0%)	131 (2.2%)

The points we make as regards this table are:

1. The multiple source figures include a range of public bodies, with some developer contribution element. Not explained, but presumably public funded with no developer contribution accounts for 307 A/F dwellings (9.5%) in Broadland, 1,418 (22%) in Norwich and 613 (10.4%) in South Norfolk.
2. There may be some 'one-off' contributions to A/F according to the GNP notes to RF70, with some houses purchased off the market by Housing Associations.

3. Overall the 106 contribution to affordable housing as a proportion of the total was low. The 106 source, and that from public subsidy, are now both under great pressure.

Ian Shepherd, CPRE Norfolk. 2nd December 2010.