

JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK: STATEMENT OF FOCUSED CHANGES. CONSULTATION JULY-AUGUST 2010. RESPONSE BY CPRE NORFOLK

PREFACE

CPRE Norfolk considers that the GNDP submission Core Strategy should be withdrawn for review, and in particular it is necessary to reconsider housing provision, both the number and location, for the period to 2026. The reasons are set out in a letter sent by CPRE and local community groups to Councillors dated 25th August, see enclosed copy.

While holding this view, we still respond to this consultation, which may not be legally compliant, and certainly the focussed changes fail to meet the soundness test; the changes are not justified or effective. Should however the public examination take place in October or at a later date, we would wish to respond to the Main Issues of the Inspectors, and appear at the examination.

FOCUSSED CHANGES TO POLICY 4: HOUSING DELIVERY AND SUPPORTING TEXT

FC1. Not sound. Not Justified; not Effective

It is not sound to continue with the RSS housing delivery to ensure that at least 36,740 new homes can be delivered between 2008 and 2026, of which 33,000 will be within the Norwich Policy Area. Housing must be linked to the prospects for jobs and the provision of a range of infrastructure. The Core Strategy relies heavily on the provision of transport (particularly the NDR), schools, medical facilities, utility services, including water infrastructure. It is abundantly clear that the required level of finance will not be available from either public or private sources. In addition, it has always been evident that such a rate and scale of development would irrevocably change the character and landscape of the countryside around Norwich.

There is a pressing need, recognised by many community groups, to review and reduce housing numbers across the whole NPA, not just in the north east, albeit this is the most extreme in being off the scale of credibility and soundness.

The proportion of affordable housing sought, and the tenure mix, ranges through 20% to 30% to 40% on site respectively for 5-9, 10-15 and 16 dwellings or more. The 'let out' lies in the statement that *The proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing.*

In current conditions, and for the foreseeable future, the targets are simply not achievable, and the more housing built, the larger will be the gap between the open market and affordable housing that will be provided. This is incompatible with existing need, and aim of housing mix, and to provide balanced communities. This is not a viable plan for homes for local people.

FC2. Not sound. Not Justified; not Effective

The replacement text states that *In some instances providing affordable housing on-site will not be viable, without a public subsidy.....but that in the market conditions prevailing in mid 2010, the 40% affordable housing target is achievable in a significant number of scenarios modelled without social housing grant.*

This is difficult to believe when considered against the Norfolk County Council Monitor Report April 2008-March 2009. South Norfolk was heralded as a star performer nationally on the basis of the proportion of affordable housing built in 2008/09. However this report (page 8) shows a housing trajectory which fell from 500 total completions in 2001/02 to less than 400 completions per year to 2005/06, with an annual average of 55 affordable dwellings (from table 3, page 24), around 10%.

Housing completions then rose sharply to a peak of 1200 in 2007/08, which included 300 affordable dwellings (25%). Total completions fell to 925 dwellings in 2008/09, but within this the affordable delivery rose to 490 units. This was presumably because on large greenfield sites the affordable element tends to lag those built for private sale. 'Balancing' the two years, we have 709 affordable dwellings from 2150 completions, a 37% proportion of the overall total completions in South Norfolk.

While this shows a large yield can be obtained from a large greenfield site, it is only possible at the tail-end of an unsustainable boom which leads to a crashing 'bust' and a market and economic environment which makes it difficult for the build of both private sale housing, and most certainly, affordable housing.

We conclude that a proportion of 40% affordable housing can only be approached on the basis of a continued rapid rise in land values and the housing market, that it may be many years before we see a repeat of this scenario (which should be avoided in any case). Further in the present economic situation it is unlikely we shall see a massive public subsidy to housing to compensate for the shortfall in developer contributions.

FC3. Not Justified; not Effective

The replacement text at 5.28B states that the most recent assessment of housing need indicates that, in the short term, 43% of overall housing need can only be met by affordable housing. It goes on to say *The policy target of 40% affordable housing on qualifying sites takes account of local experience which suggests that 40% is the maximum achievable on sites without subsidy in normal market conditions, the expectation of the Government's basic needs assessment model that current backlogs will be addressed in the short term, and the fact that not all sites will deliver the target percentage, for example....*

We can question what is meant by 'normal market conditions', but again the County Council Housing Monitor Report provides some information. Broadland District (page 8, figure 1) in 2001/02 had over 400 completions, which moved downwards to less than 200 a year in 2005/06, and then rose to about 250 a year until 2008/09. Broadland was atypical (with Breckland) in not seeing a sharp peak in completions in 2007/08, followed by a sharp fall in 2008/09, when the property market downfall equated to a Norfolk-wide drop of 32% in completions in one year.

The annual affordable housing completions varied between 70 and 140 in Broadland for the period 2001/02 to 2008/09 (table 3, page 24), an average of 104 a year. In 2008/09 affordable additions continued to rise in four districts (including Broadland and South Norfolk), reflecting RSL-driven development.

It would be useful to have a breakdown on affordable housing by planning gain on mixed tenure sites, and from public subsidy and RSL. We could then better relate the historic experience in the two funding streams to future projections and targets set. We know for example in North Norfolk, in the period 2001/02 to 2008/09 the provision of affordable housing as a proportion of all housing was 18%. The share of affordable housing that was wholly or in part funded by developer contributions amounted to just 9.6% of the 554 total. Funding from RSL and/or Council yielded 492 dwellings, 90.4% (NNDC AMR 2008/09).

Clearly the outlook for the next few years for both developer and RSL funded affordable housing will be less favourable than in recent past years, and there can be little confidence in the targets in FC3.

FC4. Not sound. Not Justified

This states at end of paragraph 5.30 add *On the evidence of recent achievements and programmed schemes in mid 2010, this is likely to produce about 1170 affordable homes between 2008 and 2026, though this is subject to the availability of funding.* This figure in the context of the text refers to exception sites housing. The submission Core Strategy (Appendix 6, Housing Trajectory) amounts to total housing completions for this period of 39,571 dwellings. The total required commitment is given at page 43 as 35,660 dwellings, and new commitments as 36,820-37,750 dwellings. In all this there will be some windfall developments, and within the affordable housing provision some exception policy housing.

If we estimate 37,000 dwellings were to be completed between 2008 and 2026, then 1170 exception sites affordable houses would represent 3.2% of the total housing provision in the Greater Norwich Area. However exception housing will only occur in the rural, non-NPA parts of Broadland and South Norfolk. The completed plus total allocated dwellings for the non-NPA amounts to 5,700 dwellings (2,159+3,541, see submission document, page 43). This would imply that 20.5% of housing in the rural parts arises from exception policy sites in the period 2008-2026. This seems high on a historic basis for rural areas in Norfolk. We question the evidence base for the estimate of 1170 dwellings from exception sites.

FOCUSSED CHANGES TO POLICY 4: Gypsies and Travellers

FC5, FC6 and FC7

We note that the same reason is given for the three changes: *To take into account the Government's intention to abolish the Regional Spatial Strategy (the East of England Plan) to substitute an appropriate locally supported target, and to indicate a mechanism for updating the target.* This approach should also be adopted for housing delivery. The GNDP should withdraw the submission Core Strategy and carry out a review with the involvement of the public on housing delivery.

FOCUSSED CHANGES TO POLICY 10: LOCATIONS FOR MAJOR NEW, OR EXPANDED, COMMUNITIES IN THE NORWICH POLICY AREA

FC8, 9, 10. Not legally compliant? Not sound. Not Justified; not Effective

The substitution of the word 'location' by 'strategic allocation' means in practice that instead of a public consultation on the growth triangle (which would happen with an Area Action Plan) there will be no public consultation (which can happen with a Supplementary Planning Document). This could be challenged in the courts as to the legality. It is certainly not justified and not effective. The motivation is explained by the minutes of the Broadland Cabinet meeting of the 22nd December 2009; *an alternative to the production of an AAP was the production of an SPD which would give Broadland the opportunity to ensure that its objectives for the growth triangle were achieved and improved the rate at which a planning framework could be developed. This strategy had been pursued by other planning authorities in England. Whilst it was noted that there were two key risks associated with the development of an SPD as opposed to an AAP, the benefits were considered to outweigh the disadvantages.*

There is no record of what were the two key risks; perhaps one was a legal challenge perhaps the other was that the approach might be considered to be unsound at the public examination stage.

The deleted text says *'This location will deliver an urban extension extending on both sides of the Northern Distributor Road.* The replacement text says *This strategic allocation will deliver an urban extension extending on both sides of the Northern Distributor Road, within the area shown in appendix 5.*

Whether the growth triangle is a 'location' or a 'strategic allocation' it is dependent on the provision of an NDR. However the Secretaries of State (CLG and DfT) decision letter of the 2nd August casts some considerable doubt on the provision of the NDR in relation to the draft orders on the slip and side roads for the A 47 Postwick Interchange. The Secretaries of State say (point 4) that *they are satisfied that in the circumstances of this case the remaining objections raise issues of such significant public importance that they should be debated publicly at a local inquiry and that an inquiry is likely to produce significant new information relevant to their decision.* Further they say at point 5 that *It has therefore been decided that until the Government's spending review has been concluded, the Department for Transport will not be in a position to identify those major infrastructure projects it can support, consistent with the Government's objectives. In view of the uncertainty over the availability of the funding for the scheme, it has been decided to defer, for the time being, the holding of the local inquiry.*

The Northern Distributor Road is seen as a fundamental requirement for the scale and location of development in the north east sector, and indeed for the whole spatial strategy of the Norwich Policy Area. There is no 'Plan B'. We consider therefore the overall Core Strategy is unsound, and the Government decision supports our case for the withdrawal and review of the document.

FC10. Not sound. Not justified; not Effective

The text which replaces the deleted appendix 5 of the submission Core Strategy provides a rationale for a Strategic Allocation approach to the growth triangle. The Strategic Allocation approach is not sound in principle.

Within this there are a number of specific points which include:

- the argument that more housing necessarily equals more affordable housing (point 3) to meet housing need, an argument frequently employed but in practice the gap between provision and need has widened over many years
- applying the PPS3 five year land supply guidance in relation to a plan which seeks to achieve a housing trajectory which is not achievable in economic terms (as well as environmental) for both housing provision and the required infrastructure; and when there is a circular relationship between proposed housing numbers, and projected rate of build, and the five year supply requirement. An unrealistically high allocation of land leads to cherry picking by developers (point 3)
- the feasibility of respecting the character and landscape of an area with a plan that envisages such a fast and high level of growth (points 4 and 5)
- the Appropriate Assessment of the JCS under the Habitats Regulation is not sufficient in that there is also the need now to take account of the Water Framework Directive and consider potential impacts on the wider water environment. Treatment of waste water, and water resource, is the key issue; albeit the mitigation against increased visitor pressure on sensitive Broadland habitats is important (point 7)
- movement including the NDR: the role and dependence on the NDR is not sound, and there is an over-optimistic approach with no alternative. *A northern Distributor Road has been proposed for Norwich for some time. It has been awarded programme entry status by the DfT. Funding for the construction of the Postwick Hub has been made available by Government. As a long standing element of the Norwich Area Transportation Strategy it is part of the “baseline” for the development strategy* (point 10)
- a Vision which is unsound in many aspects in stating: *The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to around 10,000 new homes thereafter. Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four main development centres. Development within the Growth Triangle will grow out of and reflect existing places and communities* (page 13). We add that the ‘quarters’ are seen as sitting astride an NDR, but due to the constraints of the Norwich Airport public safety zone there is a severe restriction on development in the north-west of the proposed Growth Triangle.

END

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COPY

Joint letter from the following organisations:
CPRE Norfolk
Stop Norwich Urbanisation
Norwich and Norfolk Transport Action Group
Transition Norwich
Friends of Thorpe Woodlands
Hands Off Hethersett Campaign

Please respond to CPRE Norfolk

To:

Cllr Derek Blake, Portfolio Holder for Planning, Housing and the Built Environment, South Norfolk Council

Cllr Andrew Procter, Portfolio Holder, Planning Policy and Conservation, Broadland District Council

Cllr Steve Morphew, Leader, Norwich City Council

25 August 2010

Dear Councillors,

Submission Joint Core Strategy for Broadland, Norwich & South Norfolk

We the undersigned are writing to you as representatives of the local community groups listed above to ask you as members of the Greater Norwich Development Partnership (GNDP) with responsibility for your district Local Development Framework to **withdraw for review the Submission Joint Core Strategy for Broadland, Norwich and South Norfolk**, before further resources are committed to preparations for the Examination by various parties, including by our organisations.

We support the need for affordable housing, jobs for local people and the development of sustainable communities. However, we are concerned about what we regard as excessive growth proposed by the Submission Strategy which is being imposed on local communities without their backing.

There are strong reasons for reviewing parts of the Submission Strategy in view of several significant policy statements issued by the Coalition Government:

- **A commitment to localism and empowering local communities**

In a letter dated 6 July, the Secretary of State for Local Government and Communities, Eric Pickles, informed local planning authorities in England of the revocation of Regional Spatial Strategies with immediate effect. With the removal of regional housing targets as a key driver for growth, the Joint Core Strategy should be reviewed using proposals in the Planning Green Paper for empowering local communities.¹

As the Green Paper makes clear, a local plan should be built from the bottom up by local people working together with their accountable local councils, to produce measures which genuinely reflect the will of the people. This is opposite to the top-down Submission Strategy prepared by Broadland, Norwich, South Norfolk and Norfolk County Councils behind closed doors.

The Focused Changes published on 19 July are the latest example of a long process in which the views of local people have not been paramount nor fully sought, counter to the new Coalition policy. Re-labelling north-east Norwich growth location for up to 10,000 new dwellings as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to avoid the requirement for a public examination. Moreover the GNDP is conducting a rushed public consultation on a detailed Concept Statement for Old Catton, Sprowston, Rackheath and Thorpe St Andrew during the summer holidays without the aid of public exhibitions and meetings.

- **Giving priority to reducing the Budget Deficit within 5 Years**

In the light of the Government's aim to cut public spending by up to 25%, the Department for Transport wrote to Norfolk County Council on 10 June directing the authority to minimise work on a Norwich Northern Distributor Road (NNDR) pending the conclusions of the Spending Review. Also, the Regional Funding Allocation, the main mechanism for funding major local transport schemes has been suspended², following the revocation of Regional Spatial Strategies. There is a strong likelihood that public funding for the NNDR will be withdrawn.

Furthermore, Ministerial confirmation of A47 Postwick Interchange Slip and Side Roads Orders, for implementing the NNDR/Postwick Hub project, cannot be guaranteed in the light of Government plans to hold a local inquiry. The Secretaries of State advise that "the remaining objections (to the Draft Orders)

¹ Open Source Planning Green Paper, The Conservatives, January 2010. The new arrangements are to intended to "create a planning system.....within which local people and their accountable local governments can produce their own distinctive local policies to create communities which are sustainable, attractive and good to live in". Executive Summary.
http://www.conservatives.com/News/News_stories/2010/02/New_homes_and_jobs_through_Open_Source_Planning.aspx

² "Hammond pulls the plug on RFA major scheme programme", Local Transport Today 11 June – 24 June 2010,

raise issues of such significant public importance that they should be debated publicly”.³

Since the GNDP has stated that the Joint Core Strategy is reliant on delivery of a NNDR/Postwick Hub, it would be prudent to await the outcome of the Spending Review.

- **A strong commitment to transparency in government**

The Coalition Government has made transparency a central theme, stating the “need to throw open the doors of public bodies to enable the public to hold politicians and public bodies to account”. In contrast, the GNDP has met behind closed doors since its inception in 2006. A lack of transparency has increased the difficulty of following the audit trail and undermined public confidence in the plans.

- **Opportunity for reviewing Plans**

The Government has told local authorities that they may wish to review their plans or else proceed with development of their Local Development Frameworks in a way which reflects local people’s aspirations. Also, Greg Shapps MP Minister for Housing and Local Government, has stated that before releasing funding for eco-town projects, he wants to ensure that individual schemes have the support of the wider community.

There is a widespread view that house building activity will remain at a low point over the next few years, giving a window of opportunity for reviewing the Joint Core Strategy to reflect new policy changes. A review would address the large number of soundness issues identified by the Inspectors appointed to examine the Submission Strategy.

Whilst the GNDP has pressed ahead with the Submission Strategy on grounds that delay would encourage speculative development, recent local experience does not bear this out. For example, in early July 2010, developers withdrew their plans for an additional 3,000 dwellings at Hethersett following local consultation. All three local planning authorities have up to date Local Plans which will not expire in 2011; all Policies in these Plans essential to the exercise of their powers and decision-making duties have been saved by the Secretary of State’s use of powers in Planning and Compulsory Purchase Act 2004.

In summary, the Submission Joint Core Strategy does not meet local people’s aspirations for sustainable communities. In the light of the above changes, we request that you seek withdrawal of the present draft Strategy and work with local people in an open and democratic manner to prepare a revised planning framework for creating sustainable communities that meets the needs of people in and around Norwich.

We look forward to receiving your responses.

³ Letter dated 2 August 2010 from the Government Office for the East Midlands announcing the Secretaries of State’s intention to hold a local inquiry into the A47 Trunk Road (Postwick Interchange Slip and Side Roads Orders), pending the outcome of the Spending Review.

Yours faithfully,



James Frost
Director, CPRE Norfolk

Stephen Heard,
Chairman, Stop Norwich Suburbanisation



Denise Carlo
Chair, NNTAG

Jane Chittenden,
Core Group, Transition Norwich



Phil Emery
Spokesman, Hands Off Hethersett Campaign

Lorna Beckett
Convenor, Friends of Thorpe Woodlands

CC

Richard Bacon, MP for South Norfolk

George Freeman, MP for Mid Norfolk

Keith Simpson, MP for Broadland

Chloe Smith, MP for Norwich North

Simon Wright, MP for Norwich South

Roy Foster, Mike Fox, Inspectors appointed by the Planning Inspectorate to
examine Submission Joint Core Strategy for Broadland, Norwich, Sth
Norfolk

Mary Marston, Development and Infrastructure, Go East

Daniel Cox, Leader, Norfolk County Council

Michael Hargreaves, Head of Planning Policy, Go-East

Rynd Smith, Director of Policy, Quality & Development, Planning
Inspectorate