

23rd July 2013

Re: GNDP BROADLAND NPA: RESUMPTION OF HEARING, 24TH/25TH JULY 2013

Further submission from CPRE Norfolk to be considered alongside DV 29, and with reference to the Inspector's note

The Inspector posted (17th July) a short note on the GNDP web site, with references, and set out some key issues for the hearing. The three inter-related topics which the Inspector identifies are:

- Five year housing land supply (PAS ref., section 7)
- 5% or 20% flexibility allowance on this (PAS ref., section 9)
- Persistent level of under-delivery (recent Chief Inspector Conference speech)

We take these in turn, in reverse order.

Persistent Level of Under Delivery

CPRE previously pointed out that there is an under-delivery compared to JCS plan of about 50% across the NPA as shown by the AMRs from 08/09 to 11/12, and now on the latest data to 12/13. The GNDP response DV 21 to the 24th May letter from the Inspector provides at Appendix 3a for the Broadland NPA trajectory the annual level of completions for 08/09 to 12/13 as 104, 84, 81, 157 and 55 units, total 481. This represents a consistently low level of delivery over this five year period.

This is not surprising given the unrealistically high housing targets adopted, especially given the wider economic and housing market conditions, the break point being 2008 when the recession set in. Coinciding with this the JCS for the NPA took on a step-change increase of 53% a year, from 1,194 units in the 1999 Structure Plan to 1,821 units in the JCS.

The Structure Plan in the period 1st April 2000 to 31st March 2008 saw for the NPA an over-delivery of 16%. The final and peak year 2007/08 delivery coincided with the cusp in moving from a debt-fuelled boom to a dramatic economic bust, as we are all aware.

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The Chief Inspector has the prerogative of selecting the criteria as whether or not an LPA is defined as being classified as 'persistent under delivery'. This turns on the performance over a period, split between pre-and post-recession (the GNDP in their June paper looked 13 years back to 2000 and 13 years forward to the Plan span to 2026). With the Chief Inspector definition in mind, the NPA authorities cannot be classified as a 'persistent under delivery'. What it does point to is that delivery performance is closely related to market conditions, and the degree of reality in setting housing targets. That said, using the Chief Inspector guidance, the flexibility allowance for the five year housing land supply must be 5%, not 20%.

It is very clear that it was and remains unrealistic to plan for the 53% uplift in build rate in going into a recessionary period which shows every indication of being prolonged, and rely on the market to achieve this. Further it is not acceptable that sensible planning constraints can be set aside and permissions be given for unsuitable sites in an effort to increase the delivery rate. Efforts to increase housing delivery should come from central Government finance targeted at affordable housing for local people.

The Broadland NPA housing trajectory, appendix 3a of DV21, shows total actual completions for the five years 08/09 to 12/13 at 481 units; for the current year the projection is 133 units. The total projected number of completions for the next five years, from 14/15 to 18/19, on both existing and emerging sites, is shown in total as 3,921 units. This is eight times higher than that the past five years. The final seven years of the JCS would yield a total of a further 6,905 units projected from future and emerging sites. The grand total is 11,440. This is simply not credible.

Page 109 of the GNDP JCS submission document February 2013 summarises the housing delivery and targets for the period 2001 to 2026 for the Greater Norwich area. The total of 53,770 for completed dwellings is only 8,000 short of the existing number of houses in Norwich. This target is far too high, not supported by credible housing trajectories, nor by the latest household projection statistics, and it is certainly not desirable with regard to the countryside around Norwich and the natural environment over a much wider area. The market will not deliver them the target number, nor will it provide for the affordable housing needs.

Determining whether there should be a 5% or 20% flexibility allowance in the five year land supply (PAS, Section 9)

The NPA exceeded Plan targets by 16% for the period April 2000 to end March 2008. The record of under delivery against JCS for the past five years is a reflection of both adverse economic conditions, and the adoption of unrealistically high housing numbers. Taking the criteria of the Chief Inspector we consider that the NPA authorities should not be placed as showing a 'persistent under delivery', and it would not be appropriate to consider a 20% flexibility allowance.

Further this would be totally impractical given the GNDP update (at 15th July data) on DV21. Section 9 of the PAS document makes it clear that the buffer is not an additional amount on top of the total housing provision, rather it is a move forward from later in the plan period. The GNDP have been clearly making strenuous efforts to bring greater capacity into existing sites and given several new planning permissions. The DV21 update for the Broadland NPA gives a total of 902 additional units on existing sites which can be delivered in the five year land supply period. Also planning permission has been given for a further 2,763 units, to be added to the 7,848 units with planning permission at 31 March 2013 (the DV21 baseline).

Finally, PAS section 9 suggests an analysis of completions against previous data representative of the whole economic cycle. We consider it is by no means certain what will be the length of this current recessionary stage, but in spite of this the GNDP housing trajectories would indicate a very sharp upturn in 2014/15.

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The 5 Year Land Supply (PAS, Section 7)

The NPPF states that LPAs should be able to demonstrate a five year land supply; if not there is a presumption in favour of giving planning permission to applications for new housing. The approach has been upheld at numerous appeals by the need to meet immediate housing need and secure an adequate supply of housing land.

The GNDP have made strenuous efforts to meet the five year land supply, and in this context we add two points:

- An excessive housing provision target makes excessive demands on the five year land requirement; on a specific point CPRE have shown that the latest national household projections result in a total target figure with 11,000 houses too high on this account. A reduction in housing trajectory numbers to more realistic levels would further reduce the five year land supply requirement.

- We refer to DV22, GNDP financial viability testing, and quote from the conclusions: *“The result of this exercise is not sufficiently clear cut to demonstrate that there is no risk that the rate of build out envisaged in the JCS housing trajectories may not be delivered in full within the plan period. Should there prove to be insufficient incentive to release sites for development in the short term there is considerable scope for that to be addressed through: firstly, flexing the nature of design from that assumed; or, failing this, secondly, through reducing the policy requirements for open space and affordable housing on a case by case basis through well established procedures in the planning system”.*

- The JCS has been marketed to residents on the basis of meeting housing need for local people. It is well established that Councils and developers agree to the provision of a significant proportion of affordable housing in policy provision, but then prior to building reduce this on viability grounds. Then each time we come to a new planning cycle we hear again that the high housing provision is to meet the needs for affordable housing for local people. If the Government wishes to address viability and housing need, and kick-start the construction industry, then it should put substantial investment into affordable housing, and discontinue the over-reliance on section 106 agreements.

The JCS is a plan to facilitate a population expansion of 50,000 people in the NPA (Issues and Options document, page 9). It is clearly not primarily a response to ‘homes for local people’ that figures in the GNDP strapline (along with jobs and prosperity). It is an over-ambitious growth strategy that will have serious negative consequences on the countryside around Norwich. A valid way to reduce such impacts, and maintain a quality of life for all residents, would be to lower housing targets by taking account of the latest household projections while improving viability and affordable housing delivery through an intervention from central Government.

Prepared by Ian Shepherd, CPRE Norfolk and NNTAG

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