

Programme Officer
P O Services
Puttock End
Belchamp Water
Sudbury
Suffolk
CO10 7BA

7 October 2010
HIPLALDF GNDP 1

Dear Sir,

Examination into the JCS of the GNDP Further Representations

I refer to your letter of 24 September 2010 and enclose 6 copies each of two further submissions, (Matter 2 D and E) as required.

Yours faithfully

Hugh Ivins BA MRTPI

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 2 D

Further Representations,

While FC1, goes some way to addressing the inequities of the original draft policy there is still a need for further clarity regarding the wording 'numbers rounded, upwards from 0.5'

To make it more Effective it would be clearer if an explanatory text was added to the policy.

E g, 'Where the 20% requirement results in 0.5 or less of a dwelling unit it shall not count'

H Ivins 7 October 2010

Further Representations

i)The GNDP Topic Paper 'Homes and Housing' (August 2010), in para 6.3, makes reference to the D J D 'Affordable Housing Viability Study' (July 2010). In reading the Results section of this Study regarding the Affordable Housing Target (p25), it does not appear that 'the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant' as stated in FC2 para5.29.

The DJD Study (p26) indicates that this (50%) is only achieved if the 'refined value range' is utilised whereas it would otherwise be 30%, which is by no means a significant amount.

To provide reasoned Justification FC2 para 5.29 needs to be amended.

E g. 'the 40% affordable housing target is only achievable in a certain scenarios without social housing grant'

ii)The D J D Study recognised significant housing market differences, not only, between the rural areas of Broadland and South Norfolk and the Norwich Policy Area.(P17-19) but also within the respective areas of the City itself, and the two Districts comprising the NPA.

This is not reflected in FC3 where para 5.28 A states 'there is a need in the plan area as a whole' and 5.28B refers to 'the most recent housing needs assessment for the three districts'

To be more Effective FC3 para 5.28B should include a statement that each District and the City Council should have more selective affordable housing targets, both within and outside the NPA.

E g. 'An Affordable Housing DPD will outline the required targets for each LPA in the JCS'

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 2 E (Page 1)

Further Representations,
Policy 4 Focussed Change 1

There are two parts to this policy;-

- i)The first is that Affordable Housing will be sought on all sites for 5 or more dwellings (or 0.2ha or more).
- ii)The second is that the proportion of Affordable Housing is calculated at 3 different stages comprising 20%,30% and 40% dependent on the number of dwellings (or site size)

i)In respect of the first matter,

While FC1, goes some way to addressing the inequities of the original draft policy there is a concern that it is also attempting to meet the backlog in affordable housing need at the start of the period (2008), as outlined in the Topic Paper; Homes and Housing August 2010 which states in para 6.2 'the backlog has not been met in the intervening period'.

There appears to have been no attempt to examine the reasons for this backlog either by the GNDP partners or Drivers Jonas Delloitte in their recent Affordable Housing Viability Study of July 2010.

It could well be that the current Affordable Housing policies of each LPA are simply not working. In Broadland DC's case it is 40% of 5 dw or 0.2ha. The GNDP Statement of Focussed Changes (July 2010), Annexe 1 table on page 30 shows BDC's total as 261 out of a total of 2003 in the GNDP area between 2005-2009. The majority of recent Affordable Homes in the Broadland District have in fact been provided by applications from the Housing Associations themselves, rather than through private developers.

There is no Justification in this case to include the backlog, which has resulted from an earlier adopted policy, to make up the shortfall in affordable housing provision.

To make the policy sound the backlog component should be deleted from the affordable housing provision.

Examination into the JCS of the GNDP

Hugh Ivins BAMRTPI
Representor Ref 85000
Re Matter 2 E (Page 2)

ii) In respect of the second matter,

a) There is concern regarding the inclusion of sites of 5-9dw (or 0.2-0.4ha) with a 20% affordable housing provision, (Annexe 1 Statement of Focussed Changes- July 2010 page 31) as this is shown in the DJD Affordable Housing Viability Study - July 2010 (Chart 2 on page 26), to have a high proportion of unviable scenarios (46%) with DJD stating 'our results show that the viability of any residential development is extremely constrained – regardless of affordable target, social housing grant, or any other variable appraised'. It is surprising therefore that the GNDP propose to rely on all of the small sites achieving a 20% affordable housing target as shown at SFC Annexe 1 third bullet point page 31. As a consequence the reluctance of developers to bring such small sites forward will therefore have a negative impact on the overall housing target of the JCS.

It is considered that the inclusion of 5-9 dwellings is not Justified by the evidence available nor will it be Effective in delivering the required level of affordable housing.

The FC1 first bullet point (On sites for 5-9 dw) should be deleted.

b) There is also a need for further clarity regarding the wording 'numbers rounded, upwards from 0.5'

To make it more Effective it would be clearer if an explanatory text was added to the policy.

E.g. 'Where the 30% requirement results in 0.5 or less of a dwelling unit it shall not count'

Hugh Ivins 11 October 2010

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 2 E (Page 3)

Further Representations
Policy 4 Focussed Change 2

i)FC 2 para 5.29 states that 'the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant'. However, the GNDP Topic Paper 'Homes and Housing' (August 2010), in para 6.3, makes reference to the D J D 'Affordable Housing Viability Study' (July 2010). In reading the Results section of this Study regarding the Affordable Housing Target (p25), it states 'Our results show that around 30% of scenarios are viable.

The DJD Study (p26) indicates that this (50%) is only achieved if the 'refined value range' is utilised whereas it would otherwise be 30%, which is by no means a significant amount.

To provide reasoned Justification the wording of FC2 para 5.29 needs to be amended.

E.g.'the 40% affordable housing target is only achievable in a certain scenarios without social housing grant'

Hugh Ivins 11 October 2010

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 2 E (Page 4)

Further Reperentations
Policy 4 Focussed Change 3

i)The D J D Study recognised significant housing market differences, not only, between the rural areas of Broadland and South Norfolk and the Norwich Policy Area.(P17-19) but also within the respective areas of the City itself, and the two Districts comprising the NPA.

This is not reflected in FC3 where para 5.28 A states 'there is a need in the plan area as a whole' and 5.28B refers to 'the most recent housing needs assessment for the three districts'

To be more Effective FC3 para 5.28B should include a statement that having identified variations between each District and the City Council, there should be more selective affordable housing targets, both within and outside the NPA.

E g. 'An Affordable Housing DPD will outline the required targets for each LPA in the JCS'

Hugh Ivins 11 October 2010