# **Greater Norwich** Development Partnership

Joint Core Strategy for Broadland, Norwich and South Norfolk

# **Focussed Changes**

October 2010

Jobs, homes, prosperity for local people







The responses to the focussed changes were considered by the Greater Norwich Development Partnership Policy Group and the individual local planning authorities. The following changes are being submitted to the Planning Inspector.

# Focussed changes to Policy 4: Housing Delivery and supporting text

# FC<sub>1</sub>

#### In Policy 4, delete

## Affordable housing

A proportion of affordable housing, including an appropriate tenure-mix, will be required on site in accordance with the most up-to date needs assessment for the plan area, for sites of five or more dwellings (or 0.2 hectares or more). At the adoption of this strategy the target is 40% based on the most recent assessment.

In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA).

At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose."

#### Replace with

#### Affordable housing

A proportion of affordable housing, including an appropriate tenure mix, will be sought on all sites for 5 or more dwellings (or 0.2 hectares or more). The proportion of affordable housing, and mix of tenure sought will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is:

- On sites for 5-9 dwellings (or 0.2 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
- On sites for 10-15 dwellings (or 0.4 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
- On sites for 16 dwellings or more (or over 0.6 ha) 40% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5)

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.

At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose."

#### Reason for FC1

To clarify the policy approach, and give more emphasis to the recognition that housing development viability is critical to the delivery of affordable houses on mixed tenure developments, taking into account the study of affordable housing viability undertaken by Drivers Jonas Deloitte. To clarify that where viability of the development is shown to be at risk, negotiations will include consideration of reducing the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme. To clarify that, as part of the consideration of viability, the potential for public subsidy will be investigated.

# FC2

#### In paragraph 5.29, delete the following text

"5.29 In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. In such circumstances a financial contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site."

#### Replace with

"5.29 It is recognised that affordable housing provided through developer contributions in this way is dependent upon the overall viability of development. In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. A study of affordable housing viability has concluded that smaller sites in particular may not be viable if the full 40% target were applied, but that in the market conditions prevailing in mid 2010, the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant. Where this proves not to be the case financial contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. Where it can be demonstrated that the target requirement for affordable housing would make a site unviable in prevailing market conditions, taking into account policy aims relating to the environmental standards of homes, and there are

insufficient public funds available to support affordable housing, a reduced proportion of affordable homes and/or an amended mix of tenures will be negotiated. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site."

#### Reason for FC2

To take account of the proposed focussed change FC1 and the conclusions of the Assessment of Affordable Housing Viability undertaken by Drivers Jonas Deloitte.

# FC3

#### In paragraph 5.28 delete the following

"5.28 Affordable housing is defined as 'housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford'. The EEP has a regional target for 35% of all housing to be affordable and recognises higher targets may be required locally. The findings of the most recent housing needs assessment for the three districts 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. A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15 dwellings were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites 40% affordable housing will be sought on all sites of 5 units or more.

#### Replace with

- 5.28 Affordable housing is defined as 'housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford'.
- 5.28A Based on the most recent assessment of housing need, there is a need in the plan area as a whole for about 11,860 affordable homes with approximately 60% of these being social rented, and 40% intermediate tenures from 2008 to 2026. This is derived from the annual net requirement for new affordable houses extrapolated over the plan period, and the backlog existing at the time of the housing needs assessment, with allowance made for the affordable housing provided up to the base date of this strategy. This represents just over 33% of the total housing requirement set out in the table above.
- 5.28B The most recent housing needs assessment for the three districts indicates that, in the short term, 43% of overall housing need can only be met by affordable housing. The policy target of 40% affordable housing. The policy target for 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 the expectation within the Government's guidance that current backlogs will be addressed in the short term, and the fact that not all sites will deliver the target percentage, for example because of viability issues, or previous planning policies in the case of sites with permission at the base date. The assessment of housing need also indicates that the current split of affordable tenures required to meet need in the short term, taking into account the current backlog, is approximately 85% social rented / 15% intermediate tenures, with the greatest need for social rented accommodation related to the Norwich urban area. The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need.

5.28C A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15 dwellings were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites a proportion of affordable housing will be sought on all sites of 5 units or more."

Minor amendments incorporated above:

Statement of Focussed Changes, p. 3 FC3, paragraph 5.28B	Line 3: in the second sentence replace "The policy target of 40% affordable housing" with "The policy target for affordable housing"	For consistency with the proposed policy taking into account the graduated target on small sites
Statement of Focussed Changes, p. 3 FC3, paragraph 5.28B	Line 6: in the second sentence replace "the expectation of the Government's basic needs assessment model" with "the expectation within the Government's guidance"	Correction of wording

#### Reason for FC3

To take account of the Government's revocation of the Regional Spatial Strategy (East of England Plan) and to introduce a plan wide target for the provision of affordable housing into the plan which meets the requirements of PPS3 that the provision of affordable housing should meet the needs of current and future occupiers taking into account the Strategic Housing Market Assessment. The requirement that account should be taken of viability and likely levels of finance available is recognised in FC1 and FC2, but in a volatile market, such factors are hard to quantify in the long term. To take account of the findings of the affordable housing viability study undertaken by Drivers Jonas Deloitte

# FC4

#### At end of paragraph 5.30 add

"On the evidence of recent achievements and the 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."

#### Reason for FC4

To give an indication of the potential contribution of Exceptions sites to meeting local housing need.

# FC<sub>5</sub>

# In Policy 4, delete

#### **Gypsies and Travellers**

Provision will be made for a minimum of 58 permanent residential pitches for Gypsies and Travellers between 2006 and 2011 to ensure full conformity with Regional Spatial Strategy Policy H3. These will be provided on the following basis: Broadland 15, Norwich 15, and South Norfolk 28.

Between 2012 and 2026, an additional minimum 78 permanent residential pitches will be provided to ensure full conformity with Regional Spatial Strategy Policy H3. These will be distributed on the following basis: Broadland 20, Norwich 20, and South Norfolk 38.

These will be provided on a number of sites. Generally sites will not have more than 10 to 12 pitches, but may be varied to suit the circumstances of a particular site. The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities. Some of the allowance to be provided after 2011 is expected to be provided in association with large-scale strategic housing growth.

In addition, 17 transit pitches will be provided, with the expectation that these will be provided by 2011. These will generally be in locations providing good access to the main routes used by Gypsies and Travellers, such as the A11, A47, A140 and A 143/A1066. Again, sites would not normally be expected to accommodate more than 10 to 12 pitches.

Research also shows the need for additional plots for Travelling Show People. The expectation is that 15 additional plots will be provided by 2011 and a further 12

between 2012 and 2026. These will be located on sites within the Norwich urban area, or if sites within the urban area cannot be identified, close to it."

**Note** The text in italics was proposed in the submitted schedule of minor changes.

#### Replace with

# **Gypsies and Travellers**

Provision will be made for a minimum of 58 permanent residential pitches to meet the need arising between 2006 and 2011, provided on the following basis: Broadland 15, Norwich 15 and South Norfolk 28. The level of provision beyond that date will be based on updated local evidence of need.

Residential pitches will be provided on a number of sites. Generally sites will not have more than 10 to 12 pitches, but may be varied to suit the circumstances of the particular site. The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities. Some of the pitches provided after 2011 are expected to be provided in association with large scale strategic housing growth.

In addition, transit pitches will be provided based on local evidence of need. These will generally be in locations providing good access to the main routes used by Gypsies and Travellers such as the A11, A47, A140 and A143/A1066. Again sites would not normally be expected to accommodate more than 10 to 12 pitches.

Research also shows the need for additional plots for Travelling Show People. The expectation is that approximately a further 27 plots will be provided by 2026, on sites within the Norwich urban area, or if sites within the urban area cannot be identified, with easy access to it."

#### Reason for FC5

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.

# FC6

### Delete paragraph 5.32, and replace with

"A partial revision to the East of England Plan in 2009 set requirements for the provision of pitches to met the needs of Gypsies and Travellers in accordance with the requirements of Government Circular 01/2006. The target set was for 58 net additional pitches across the GNDP area to be provided by 2011. Beyond this the East of England Plan set an approach to longer term provision based on extrapolation which equated to a need for an additional 78 pitches between 2012-2026. The targets up to 2011 were broadly supported by the Greater Norwich Development Partnership authorities who considered them reasonable in the light of the Norfolk wide Gypsy and Traveller Accommodation Needs Assessment undertaken in July, 2007. However, beyond 2011 the proposed approach was disputed and the local authorities consider this level of need would be better determined by updated local evidence. It should be noted that a pitch represents a family unit and may therefore accommodate more than one caravan. On average about 1.7 caravans occupy each pitch. Since 2006, 11 pitches have been permitted or completed in Broadland, 14 in South Norfolk and an application for a further 3 is pending in Norwich."

#### **Delete Paragraph 5.35**

#### Reason for FC6

To take into account the Government's intention to abolish the Regional Spatial Strategy, to substitute an appropriate locally supported target, and to indicate a mechanism for updating the target. The intention to abolish the Regional Spatial Strategy makes the explanation in Paragraph 5.35 unnecessary.

# FC7

#### Delete paragraph 5.36, and replace with

"There is a large existing site for Travelling Show People in Norwich, which is fully occupied, and local evidence suggests there is a need for further accommodation. Each plot will need to include room for vehicles providing accommodation and also for the maintenance and storage of fairground rides and equipment."

#### Reason for FC7

To take into account the Government's intention to abolish the Regional Spatial Strategy, and to substitute an appropriate locally supported target.



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