

**EXAMINATION INTO THE JOINT CORE STRATEGY (JCS) FOR BROADLAND, NORWICH AND SOUTH
NORFOLK PRODUCED BY
THE GREATER NORWICH DEVELOPMENT PARTNERSHIP**

**RESPONSE TO INSPECTOR'S QUESTIONS AND MATTERS FOR THE FORTHCOMING EXAMINATION
INTO THE JCS**

**SUBMISSIONS MADE BY SAVILLS (L&P) LTD (MR GARTH HANLON)
ON BEHALF OF EASTON LANDOWNERS CONSORTIUM (8547)**

**MATTER 2: DOES THE JCS MAKE SOUND PROVISION FOR HOUSING DELIVERY (POLICY 4 AND
APPENDIX 6): HOUSING PROJECTORY**

GENERAL HOUSING

(a) Is JCS's planned provision of housing land to 2026 justified, effective and consistent with national policy, including recent changes to PPS3 Housing with regard to the status of garden land and the deletion of a national indicative minimum density?

1.1 The JCS has set out a Strategy which requires allocations to be made within that Plan to ensure that at least 36,820 new homes can be delivered between 2006 and 2026. Our submission to Matter 1 confirms that on behalf of the Easton Landowners Consortium, we support the general strategy of locations of new growth and specifically the reference to Easton/Costessey.

1.2 It is entirely appropriate that in response to the Inspector's questions, GNDP have acknowledged that forecasting the need for new housing is not an exact science and in such a context it is had to call upon a number of sources of evidence. It is important at this juncture on behalf of the Easton Landowners Consortium to support the continued progress of the JCS despite calls from some quarters to abandon the process because of the revocation of the RSS. Whilst we accept that the abolition of the RSS removes the need to meet a centrally imposed target, it does not remove or dilute the need to meet the long term needs and economic potential of the three relevant Councils. It is vital that the JCS proceeds whilst acknowledging that issues such as the provision of infrastructure are dealt with appropriately as part of the Strategy.

- 1.3 As such, GNDP have looked at various sources of evidence to predict the need and the detailed information fed into the JCS figures. Such figures and references are contained in the Topic Paper “Homes and Housing” dated August 2010. The overriding issue is of course to ensure that housing provision is based on evidence and at paragraph 3 of PPG3 (as revised) the document identifies the types of evidence required.
- 1.4 The Topic Paper summarises the findings of a number of organisations who we consider as the most applicable and relevant parties to input into housing projections. Whilst understandably there is a range of figures, we would argue that they do not radically change the JCS figure but rather seek to justify a balanced approach which looks to provide a robust level of growth capable of being delivered rather than an undeliverable higher figure which challenges all sorts of critical issues, not least of which is market delivery and infrastructure provision in tandem with development.
- 1.5 We consider that the overall figures within the JCS are justified having regard to the above and are capable of being delivered within the Plan period. Identifying a strategy to ensure a number of development locations are promoted ensures that there is no reliance upon a single site or option and we have made responses to Matter 1 to support such a strategy.
- 1.6 Regarding the Inspector’s questions regarding the changes to PPG3 affecting garden land and density, we do not suggest that either will have an impact on the justification of the housing figures. With SHLAA thresholds being over 1 hectare (and which form part of the evidence base for JCS figures) the effect of garden land will be negligible - the removal of a national minimum density standard “merely” removes wording within PPS3 but yet remains an applicable figure nevertheless in terms of the character of certain areas within the Plan area.
- (b) Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of developable housing lands for years 0-5 (and deliverable for years 6-17) in the overall context of the three Councils’ planned and programmed Local Development Documents (see paragraph 53, PPS3)?**
- 1.7 Concerning the mechanisms and timescales for delivering housing land over the planned periods, the table “Growth Locations” contained within Appendix 6 of the JCS identifies a start date for growth locations within the Plan and then identifies the total number of units coming forward within those locations up to 2026 and the end of the Plan period. Understandably, the content of that part of the JCS can only be considered to be indicative since there are a huge range of factors which dictate both the construction start on site and of course the delivery of units per year over the lifetime of that development.
- 1.8 The SHLAA forms the basis for such projections and it is entirely appropriate that the information within that table is treated with some caution. It is not intended to be a programmed plan but does

provide an informed view as to the rate of units coming forward within individual locations and across the planned area over the Plan period.

- 1.9 In respect of development at Easton/Costessey, development is envisaged to commence in 2014/15. In circumstances where the planning permission was granted and development could commence earlier, there is no reason why the start date and ultimately the delivery of units could not be brought forward within the Strategy.
- 1.10 We are aware that at the time of the Examination, South Norfolk will have undertaken consultation on their Site Specifics and Allocations Development Plan Document and clearly representations will be made on detailed issues consistent with the overall strategy within the JCS. As far as South Norfolk is concerned and specifically our client at Easton, the paralleling of the Site Specifics and Allocations DPD with the Core Strategy confirms the District Council's commitment to moving forward in a way that fulfils the JCS requirement.

AFFORDABLE HOUSING

(d) Is Policy 4 (as amended by GNDP Focussed Changes 1-4) justified, effective and consistent with National policy in relation to Affordable Housing (AH)?

- 1.11 Policy 4 within the JCS has undergone a significant change as a result of the publication of the Focussed Changes in respect of housing delivery and the supporting text.
- 1.12 The policy suggests that the proportion of affordable housing mix and mix of tenure will be based on a most up to date needs assessment for the Plan area and then proceeds to state that at the adoption of the Strategy, certain target proportions will be required in order to meet the demonstrated housing need. We would seek comfort from GNDP that the proportion of affordable housing will not change (whatever figures are contained within it) without subjecting the policy to further testing through the Development Plan process.
- 1.13 In terms of the introduced Focussed Changes to introduce variable housing targets dependent upon scheme size, it is important that the likely impact upon the overall levels of housing delivery has to be assessed. The difficulty in the approach sought is to apply different targets to different sized sites which in our view will make smaller sites more attractive than larger ones where a larger proportion of affordable housing need is focussed. Given that the JCS contains significant growth locations where a 40% provision would be needed according to Policy 4, it is important that any threat to their delivery is considered. Coupled with significant infrastructure costs, aside from affordable housing costs, the delivery of strategic sites is an important component part of the Plan and any shift in emphasis to smaller sites will not provide the important community benefits and infrastructure needed to cope with significant amounts of new growth over the Plan period.

The effect of the policy may well delay the delivery of the strategic sites and the consequent release of smaller sites in less favourable/unsustainable locations. We do not consider that the differential approach contained within the Focussed Changes as reflects affordable housing is appropriate to the Strategy given the emphasis and importance of larger strategic sites and their delivery within the Plan period. Consequently we do not consider that Policy 4 as it relates to the provision of affordable housing will be effective in terms of the Strategy.