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Director: A. Presslee

Mr M Burrell  
Greater Norwich Development Partnership  
c/o Broadland District Council  
Planning Department  
Thorpe Lodge  
1 Yarmouth Road  
Norwich  
NR7 0DU

Dear Mr Burrell

**Greater Norwich Local Plan  
Regulation 18 Draft Consultation, 29 January – 16 March 2020  
Policy 5 – Homes (Affordable Housing)**

I hereby make representations pursuant to the current (Regulation 18) consultation on behalf of Norfolk Homes Ltd.

It is noted that at paragraph 240 of the Draft Local Plan, it states:

*“240. The policy sets a general requirement for on-site affordable housing provision of 33% on sites that show better viability based on local evidence, with a lower requirement in Norwich City Centre. This is based on:*

- o The Strategic Housing Market Assessment 2017 which identifies a need for 11,030 affordable homes in Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point;*
- o Under national policy, small sites under 10 dwellings are not required to provide affordable housing. Larger sites will therefore have to ensure that overall affordable housing need is delivered;*
- o The most recent viability study findings which conclude that centrally located brownfield sites which have higher development costs which affect viability are generally able to provide 28% affordable housing;*
- o Some specific sites have very high costs associated with development. These are allocated with lower affordable housing requirements.”*

Within ‘Policy 5 – Homes’ is included:

*“Affordable Housing*

*Major residential development proposals and purpose-built student accommodation will provide:*

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing;
- affordable housing on-site except where exceptional circumstances justify off-site provision;
- a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;
- affordable housing of at least equivalent quality to the market homes on-site.

*The sub-division of a site to avoid affordable housing provision will not be permitted.*

This begs the question: if the most up-to-date SHMA identifies a need for 28% affordable housing, why then is the policy seeking a minimum of 33% (outside of Norwich City Centre)? The implication – although somewhat disingenuous – is that the shortfall arising from the Government policy of excluding affordable housing provision from housing developments of fewer than 10 units must be made up by inflating the evidentially-based 28% (SHMA) proportion. In effect, cross-subsidising the perceived ‘shortfall’ through major housing schemes (10 or more units).

We believe there is a clear case for the Local Plan to reflect its evidence base (insofar as it relates to affordable housing) by requiring that the proportion of affordable housing sought reflects the most up-to-date needs assessment, i.e. 28%. Indeed, that the approach adopted in Policy 4 (Housing Delivery) of the Joint Core Strategy is carried forward into the new Local Plan: *“The proportion of affordable housing, and mix and tenure sought will be based on the most up to date needs assessment for the plan area.”* (Draft policy 5 only says that *“a mix of affordable housing sizes, types, and tenures...”* should reflect the most up-to-date evidence, not the proportion. The proportion has changed over the Plan (JCS) period – notably since the publication of the 2017 SHMA - and has been reflected in Councils’ approaches to decision making thereafter. There now appears to be a marked change in the Councils’ approach to an evidentially-based and up-to date proportion of affordable housing, without justification.

The GNDDP may feel it has a case to make – other than simply to make up the overall affordable housing levels through its absence in minor (sub 10 unit) developments - but we cannot find any proper rationalisation in the Draft Local Plan, nor in its supporting evidence, including the Interim Viability Study (November 2019). This is a serious omission that should be properly addressed, to avoid adverse impacts on housing delivery and viability through the Plan period.

Please let me know if you require any further information or clarification.

Yours sincerely

Alan Presslee BSc. (Hons.) DipTP MRTPI  
**Director**

Cc Mr. C Lockwood – Norfolk Homes Ltd.