

**Matter: 2**  
**Representor Reference Number:**



**GREATER NORWICH DEVELOPMENT PARTNERSHIP**  
**JOINT CORE STRATEGY EXAMINATION**  
**REPRESENTATIONS IN RESPONSE TO INSPECTOR'S QUESTIONS**

**MATTER 2: DOES THE JCS MAKE SOUND PROVISION FOR HOUSING DELIVERY?**

**Question A - JCS housing provision:**

The GNDP has prepared a Housing Topic Paper (Document EIP70) which addresses issues following revocation of the Regional Spatial Strategy by the Coalition Government. That Paper has also taken account of changes to PPS3 Housing as regards the changes to the definition of previously developed land and the indicative minimum densities that housing development should achieve.

First, insofar as the JCS meeting the Tests of Soundness (as set out in PPS12 Local Spatial Planning) is concerned, we would agree with the approach adopted by the GNDP within the Topic Paper where they test the housing provision for the period to 2026 against evidence that informed the Adopted East of England Plan and also the implications of the Option 1 forecast in the emerging RSS prior to revocation.

It is also of note that the Paper has assessed various forecasts that relate to provision of future housing need. For example, the likely household formation rates indicate a dwelling requirement for the period to 2026 of 44,800 dwellings. However, the Paper raises concerns as to whether the market has the ability to deliver this higher rate of growth. It also indicates a need to test against any consequential impact on the environment.



In the consideration of assessing soundness of the JCS it is relevant to note that the Strategic Housing Land Availability Assessment (SHLAA) indicates a supply of 42,000 dwellings. On that basis the JCS would meet the requirements of PPS3 in terms of identifying a supply of specific housing development such that it can be regarded as being sound. The evidence contained in the SHLAA indicates a capacity to accommodate the required housing through subsequent local development plan documents to be prepared by the respective local authorities.

Insofar as the issue of consistency with national policy, having particular regard to the changes to PPS3 Housing are concerned, again the Topic Paper addresses these and indicates that in the urban areas outside the built-up area of Norwich such as Wymondham, an assumption of 40 dwellings per hectare is applied. The appropriate density for individual sites will be a matter to be assessed through the site allocations development plan document stage.

It seems to us that for purposes of the Core Strategy that is intended to identify broad locations for growth that it is inevitable that certain assumptions need to be made in order to move the development plan process forward. The detailed application of those broad assumptions can be resolved through the site allocations process which will allow a range of sites to be allocated to meet the overall housing delivery target.

Insofar as Pelham Holdings site at South Wymondham is concerned, it comprises an area of land that is capable of accommodating an average density across the site of 40 dwellings per hectare without adverse environmental effects.

To conclude insofar as Question A is concerned, it is our view that the JCS meets the Tests of Soundness as set out in PPS12.

**Question B - Mechanism and timescale for delivery of housing:**

Pelham Holding's proposals relate to land at South Wymondham within the administrative area of South Norfolk. The authority are currently consulting on a Site Specific Allocations document. It is proposed that the document will be submitted to the Secretary of State in September 2011 with Adoption in 2012. A Wymondham Area Action Plan is intended to run in parallel with the Site Specific Allocation document.



We will be submitting representations on behalf of Pelham Holdings and will be particularly emphasising the ability of the site to commence delivery of housing on the site within the first five years of the plan period and to provide or contribute to local community infrastructure in a phased manner commensurate with development of the site.

Technical appraisals relating to development of the site have been prepared and will support a planning application to be submitted in due course. These appraisals confirm the deliverability of housing development on the site.

Insofar as South Norfolk is concerned, the timing for preparation and adoption of a Site Specific Allocations document will provide a policy framework against which individual planning applications can be considered and which will contribute to meeting the housing provision set out in the JCS.

**Question C – Are there any changes required:**

As set out above we consider the Joint Core Strategy to be sound and therefore offer no response to Question C.

**Questions D to J – Affordable Housing:**

We do not wish to respond to questions on this matter.

**Question K and L – Gypsies and Travellers:**

We do not wish to respond to questions on this matter.

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