

# Greater Norwich Development Partnership Joint Core Strategy Examination

## Matter 2 Does the JCS make sound provision for Housing Delivery? (Policy 4 & Appendix 6: The Housing Trajectory)

Written Statement on behalf of Landstock Estates Ltd  
and Landowners Group

## GENERAL HOUSING

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

1.1 There are a number of issues that arise in considering the response to this matter:

- Whether the level of housing planned to 2026 is appropriate;
- Whether the level of housing, on an annual basis, is robust and acceptable (is supply backloaded);
- Is the spatial approach and distribution sound?
- Are the forecast components of supply robust?
- Does the deletion of minimum density and revised policy position regarding garden land undermine the assumptions, either as to dwelling yield or principle of release?
- Is the plan sufficiently flexible<sup>1</sup> to address changes in circumstances?

### Level of Housing to 2026

1.2 Paragraph 53 of PPS3 (June 2010) requires the GNDD to identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption within LDD's. Paragraph 55 states that Local Planning Authorities should also:

- Identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.
- Linked to above, identify those strategic sites which are critical to the delivery of the housing strategy over the plan period.
- Show broad locations on a key diagram and locations of specific sites on a proposals map.
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.

---

<sup>1</sup> PPS12 P21 sets out definition of justified, effective (being deliverable, flexible and able to monitored) and consistent with National Policy.

- 1.3 Paragraph 57 of PPS3 states 'once identified, the supply of land should be managed in a way that ensures that a continuous 5 year supply of **deliverable** sites is maintained ie at least enough sites to deliver the housing requirements over the next 5 years of the housing trajectory. Our additional Policy as set out in Matter 01 seeks to provide the mechanism for this.
- 1.4 Following the abolition of the RSS by the Government, the GNDP confirmed its position that the RSS requirement as set out in Policy 4: Housing Delivery remained the appropriate housing requirement (EIP 70). The RSS set out a requirement of 41,800 dwellings in the NPA from 2001 - 2026 (paragraph 6.5 of JCS). This equates to 1,672 dwellings per annum. As of 2008, 21,500 dwellings had been committed and therefore a further 21,000 dwellings were required to be found to meet the target at 2026.
- 1.5 In February 2010, the GNDP released its Statement on 5 year Housing Land Supply (EIP 16). The statement confirmed that a base date of 1<sup>st</sup> April 2010 annual completions rates of 1823 for the remaining plan period was necessary to achieve the plan provision of 33,000 for the period 2008 to 2026 within the NPA. The forecast completion rates for the 5 year period commencing 1st April 2010 amounted to 6,609 resulting in a 3.63 years supply and a shortfall in the same 5 year period of 2,506 dwellings ie 500 per year for the next 5 years. It is evident that a serious problem exists within the NPA and that the JCS cannot in its current form deliver a 5 year of land as demanded by PPS3. We accept that the shortfall will be reduced by 250 as a consequence of the Wymondham appeal decision confirmed in November 2009.
- 1.6 As such, based on PPS3 requirement to identify 15 year's worth of supply, 27,958 dwellings (15yrs x 1,650 dwellings + existing deficit of 3,208 dwellings at 1<sup>st</sup> April 2010) are required to be identified for a 15 year time period. Notwithstanding that the trajectory identified in Appendix 6 of the JCS is now out of date, EIP 16 is clear (paragraph 5) that in the past 9 years, only once (2007/08) did the NPA achieve a completion rate above the RSS requirement and above the future 15 year requirement from 2010 onwards. On average, the NPA has delivered 1,313 dwellings per annum in the period 2001/02 – 2009/10. This points a need for greater flexibility to address shortfalls and delays in delivery, regardless of the merit of the allocations/identified locations.
- 1.7 Policy 4 sets out the general approach to meeting housing in the GNDP area to 2026. Appendix A sets out a summary of the GNDP position, formulated on a 2008 base date, with comments. Our concerns can be summarised as follows:

**Base Date:** The submitted JCS is based upon a 2008 base date, presumably completions to March 2008. Given the advice in PPS3 that the JCS should be based upon the anticipated year of adoption, it would be helpful if the GNDP could provide an updated schedule (policy 4) and trajectory. It is noted that EIP 16 Appendix D provides for a more up-to-date trajectory and includes a site schedule with anticipated delivery rates in the NPA. Notwithstanding that we question some of these assumptions (e.g. Sprowston: Land at Blue Boar Lane/White House Farm, indicates the delivery of 50 units by March 2011, with development yet to commence and with outline planning consent only granted at the end of September 2010 ), we consider that updating the JCS will have the added benefit of providing a sensitivity test of the assumptions that underpin the JCS, for example that completions will in fact commence at Rackheath in 2011/2012.

- 1.8 It is evident that the JCS trajectory (Appendix 6) is over ambitious as to the delivery of dwellings. For instance for the years 2008/09 and 2009/10, the JCS (Appendix 6, p108) anticipates 1,270 units and 1,295 units respectively to be delivered in the NPA. EIP 16 identifies that actual completions in 2008/09 and 2009/10 were 1,189 units and 945 units respectively i.e. a shortfall in just those two years of 431 dwellings. This is characteristic of delivery in the NPA.

**Commitments and Non-implementation:** Commitments are identified to deliver some 14,000 dwellings over the plan period, the majority of which are identified for delivery in the period to 2015. The GNDP assumptions as to 5 year land supply.

- 1.9 Two issues arise:

- Whether a discount should be provided for to allow for non implementation;
- Whether the plan is sufficiently flexible to allow for any under-provision.

- 1.10 The issue of non-implementation rates was considered at the recent examination of the St Edmundsbury Core Strategy. An extract of their approach is provided in **Appendix 1**.

**Split Between NPA and rest of the GNDP Area:** RSS14 at Policy NR1 set out the basis of the division between the NPA and the rest of GNDP. Given the decision of the GNDP to maintain housing requirements as per the RSS, the split between the NPA and rest of the GNDP should also be maintained, as should the 5 year supply requirement across the NPA as a whole.

**Spatial Approach:** The evidence base includes the SHMA (H4), an assessment of settlements/hierarchy (TP7) as well as the SHLAA (H1).

- 1.11 Norwich is the principal centre within the GNDP area and should therefore form the focus for development. Wymondham is identified as the only 'Main Town' in the NPA and likewise, should and can make a positive contribution to housing provision. As stated in our submissions, our concerns relate to the level of development proposed between the settlements and the relationship of the proposed allocations to the SEA/SA. It is evident that the balance of distribution of housing is disproportionate to the evidence base and Wymondham for example, can accommodate a higher level of development in accordance with the evidence base.

**Rate of Delivery of Allocations (P111):**

- 1.12 We have set out in the preceding paragraphs that the year on year trajectories are over ambitious and the actual delivery rates in the NPA compared to the anticipated delivery rates identify a deficit with the annual requirement already over and above the average historical delivery rates. Notwithstanding that, the GNDP anticipate to deliver higher than ever annual completions and this is set out in the trajectory in Appendix 6, p111, for the growth locations. Based on latest guidance, the 5 year period begins the April following the latest AMR (usually published in December). On the basis that the Examination is only one month prior to this i.e. November 2010, for the purposes of this debate, we will take the 5 year period beginning from April 2011. Reviewing the trajectory the following is noted:

**Completion Rates:** We question the proposed annual quantum of dwellings to be completed from each location on an annual basis. The rates set out in the trajectory are particularly high and considered unachievable - even in a good market. We do not consider that the Ecotown would be able to complete 230 dwellings per annum. Nor do we consider that Long Stratton would achieve 230 dwellings per annum (from 2019/2020). Assuming an output of 50 dwellings per developer per annum per site, the need would exist to see 5 developers on a site. This would be repeated in North East Norwich where 7 major sites will be required to achieve 350 dwellings per annum. The completion rates are expected to significantly increase in the 4<sup>th</sup> year (2014/15) and rises from 230 dwellings to 1,355 dwellings. This is a significant step up and a large number are reliant on the 'floating' allocations (320 per annum) in South Norfolk and Broadland. Given that these allocations will need to be identified through a site allocations DPD, it is not considered that these sites (nor sites in other locations) will be able to deliver completed units in 2014/15 as anticipated.

**Rackheath:** The trajectory at Appendix 6 identifies first occupations commencing at Rackheath Eco-Town in 2011/12 (i.e. year 1 of the 5 year trajectory) at 180 dwellings rising a year later to a consistent 230 dwellings per annum. This provides a delivery of 1,100 dwellings from the Ecotown in the next 5-year period. It is understood at this moment in time no planning application has been submitted. On this basis, it is unlikely that 180 dwellings will be delivered in 2011/12, or 1,100 units delivered in the 5 year period. Upon reviewing the 'Rackheath Concept Statement', Chapter 20 sets out the anticipated delivery for the Eco-Community.

*20.7 'the scheme lead time is likely to be in the order of two years, once outline planning consent is granted. If consent to develop was granted by Autumn 2010, then phase 1 of the scheme could commence by 2012, subject to the detailed planning consent needed for infrastructure and homes. On this basis, phase 1 would be available by Easter 2014.'*

*20.8 'In the intervening period a demonstration project of circa 250 homes could potentially commence by mid 2011 and be available from Autumn 2012.'*

It is evident that even the developer does not anticipate the delivery of units until Autumn 2012 (i.e. year 2) and certainly not in 2011 as set out in the JCS. The timings for Phase 1 requires an application to have been granted now (i.e. Autumn 2010) in order to achieve the above timetable, however, the smaller, exemplar scheme is yet to be submitted. Nevertheless, the LIPP (version 1 September 2010), Table 11, repeats this growth rate even though in paragraph 8.7 it states this will be a challenged.

**NE Norwich:** In addition to Rackheath, the JCS (p111) identifies first occupations to arise in 2014/15, providing a total of 3,850 dwellings by 2025/26. This level of development is dependant upon the delivery of the NDR. EIP 51 – Statement of Focused Changes paragraphs 26, 45, 46, and 47 July 2010 confirms that the maximum capacity of NE Norwich was 3,200 dwellings arising from new JCS allocations without the NDR (assuming 1,000 from the Ecotown) can be completed compared with a trajectory of 7,250 by 2026. Based on the trajectory the 3,200 completions permissible without the NDR being open for traffic will occur by mid 2016. It is not reasonable to assume that such projections are capable of completion in the current political and economic climate.

- 1.13 Again, there is significant uncertainty as to the delivery of the NDR and hence capacity of the growth triangle in the plan period.

**Norwich:** It is evident in EIP 16 Appendix D and the SHLAA that there are a significant number of identified development sites in Norwich to achieve the annualised rate as set out in the JCS. Furthermore, Norwich City has historically performed well in reaching its annualised housing requirements.

**Wymondham:** The JCS Technical Consultation August 2008 (Reg. 25) tested a level of growth for Wymondham of up to 4,000 dwellings (Option 1). This option was tested by the Sustainability Appraisal (pp 37-38 and table 3.3) (JCS 3) and consulted upon. As demonstrated in our submissions, Wymondham can accommodate a level of growth in excess of the 2,200 identified in the submitted JCS.

**Other South Norfolk Settlements:** We have also expressed concerns as to the scale of allocations proposed at a number of other settlements (see submissions in respect of matter 1 and 3).

- 1.14 By way of example only: The amended Sustainability Appraisal (September 2009) (JCS 3), identifies in Table 5.9 p58 that the overall economic effects for Long Stratton are:

**“This spatial growth strategy performs strongly in terms of economic objectives, although it is noted that in Long-Stratton housing growth may be promoted in an area that does not have access to a strategic employment location.**

**At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away). This issue relating to Long Stratton has been highlighted through previous iterations of the Sustainability Appraisal (and so can be seen to have been considered as part of previous consultations).”**

- 1.15 Notwithstanding this less than positive assessment, EIP 81 Appendix 6 Paragraph 4.5 identifies that without the bypass, Long Stratton could only accommodate 20 - 50 dwellings. Even if the bypass is delivered, the LIPP (EIP 85) Appendix 3 identifies that the Long Stratton Bypass (T3) is estimated to be delivered by 2021. However, a review of the trajectory in Appendix 6 of the JCS (P111) identifies that a total of 650 dwellings will have

been delivered in Long Stratton by this time i.e. 600 dwellings above what can be accommodated without the bypass in place.

***The 3,800 floating allocation:*** The JCS needs to provide further guidance as to how the 3,800 floating allocation will be addressed in subsequent DPDs and the criteria that should be employed to ensure consistency with the spatial vision and strategy of the JCS.

**B Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of developable housing land for years 0-5 (and deliverable land for years 6-15) in the overall context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?**

1.16 PPS3 requires the JCS to *'identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption within LDD's.* We have commented elsewhere as to our concerns as to the rate of delivery. The DPDs/AAPs that form each authority's LDF will be progressed by the individual authority. The JCS does not make any provision for strategic allocations (based on the GNDP Policy Group decision not take forward the SoFC relating to the Strategic Allocation) (EIP 81). A summary table of the proposed timetables are set in **Appendix 2.**

1.17 Table 1 demonstrates that the Site Allocations DPD's are not anticipated to be adopted (at earliest) until Spring/Summer 2012 for all 3 authorities. This is some 18 months away and Norwich City's Site Allocation DPD has been delayed by 4 months. The above timetables represents further delay of identifying deliverable sites to meet the JCS trajectory and was explored further above.

**C If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.**

1.18 Our concerns primarily relate to the level of development identified for various settlements, the timing and delivery of the various proposed identified sources of housing land supply and the lack of flexibility. We have proposed in our response to Matter 1 amendments to Policy 9 and a new Policy 9a as well as the trajectory supporting Policy 4.

1.19 In the light of the continuing 'delay' of delivery of housing elsewhere (as evidenced above) and notwithstanding our concerns as to the level of development identified at certain settlements, it is critical to ensure flexibility is written into the plan. It is considered that Wymondham would be able to provide the infrastructure projects like the Bus Rapid Transit



and realise the sustainable pattern of growth envisaged by the GNDP without any delay on the A11 corridor. This particular issue is dealt with in greater detail in Matter 03.

## **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)?**

1.20 The policy is neither justified, effective nor consistent with national policy: it is neither founded on an up to date evidence base, nor on a sound viability study. The policy will not be effective. It will not lead to much needed homes in both the market and affordable sectors being delivered, with the consequence that the need for affordable housing will increase across the GNDP area. This consequence would not be consistent with national policy which requires LPAs to take account of the impact of thresholds and proportions on the overall level of housing delivery (para.29 PPS3).

1.21 There is a need for affordable housing across the 3 local authority areas and it is important that policy 4 is effective in delivering housing to meet those needs. Moreover, it is important that suitable locations, including Wymondham, are identified in the JCS to enable this delivery to occur. For example, NE Wymondham is well placed to meet the needs for affordable housing from across the 3 authority areas, including those generated from Norwich where supply will be more limited. In section J below we set out how the policy should be framed to ensure delivery.

### **E Does the viability study by Drivers Jonas Deloitte, dated July 2010, provide sound evidence for the amended policy on AH? [see results and conclusions at p24-35]**

1.22 In our response to the Focussed Changes consultation we set out a list of shortcomings of this work in detail. In summary:

- There is no evidence to indicate how the values for Greenfield allocated sites have been derived
- The "accepted benchmark" should be the relationship between EUV and/or AUV taking account of factors which incentivise a landowner to sell, and residual land value
- The choice of the three Greenfield benchmarks fails to understand how landowners operate
- The benchmarks fail to include the scenario where an informed landowner understands his land may have prospects for development.

- It is clear that if these benchmarks are adjusted the results of the model will be considerably different, resulting in a higher number of unviable scenarios
- The study does not adequately address the direct criticism of the Affordable Housing Assessor into what incentivises landowners

**F Does the JCS expressly fulfil the requirement of PPS3 para 29 for (a) a plan-wide target for the amount of AH to be provided, in terms of both social rented and intermediate tenures, the size and type of AH, and the approach to developer contributions?**

1.23 It would appear that in para. 5.28A of FC3 there is a plan-wide target of 33% based solely on “need” and not other factors. Para. 5.28B and FC1 indicate divisions between social rented and intermediate based on the last assessment of housing need. There is no up to date evidence to show these proportions, 85:15, are relevant today and we believe such proportions were derived from a traditional and narrow consideration of housing need as opposed to arriving at divisions which will meet the twin objectives of providing homes for those who require affordable housing and to ensure mixed and sustainable communities can be fostered.

1.24 No reference has been made to the size and type of AH, and there is no reference to what approach might be taken to seeking developer contributions in-lieu of on-site affordable provision. It would be appropriate to include a policy statement stating that these matters will be the subject of a later DPD or SPD (see below).

**G National policy in PPS3 excludes housing for sale from the definition of AH, whereas the JCS includes it [see glossary at Appendix 9]. Are there any local circumstances to justify this departure from national policy?**

1.25 We do not consider that PPS3 excludes housing for sale from the definition. Intermediate affordable housing is defined in Annex B of PPS3 as including “shared equity products, other low cost homes for sale and intermediate rent”. Para 38 of “Delivering Affordable Housing” includes “Discounted Sale” as a form of intermediate affordable housing. We accept that “low cost market” housing will not fall within the definition. Our primary concern with the definition is that the reference to “people in housing need” is too narrow and should be changed to “specified eligible households whose needs are not met by the market”. We are also concerned about the use of the word “permanently” because tenants have a lawful right to buy and acquire. This position is allowed for in the PPS3 definition of affordable housing.

**H Does the JCS provide sufficient clarity about the phrase ‘appropriate settlements’ in the context of exceptions schemes?**

1.26 No comment

**J If the JCS is unsound in relation to AH, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]**

1.27 Given the lack of an appropriate evidence base to support much of the policy, we believe it would be more appropriate to put back a number of the matters for later consideration in a separate DPD or SPD. This is something commonly found in other Core Strategies. For example, the wording in **Appendix 3** comes from the Bracknell Forest Core Strategy, adopted in 2008:

1.28 We believe a similar policy approach would be appropriate for the JCS. Therefore, the policy wording as set out in **Appendix 4**, which draws on those aspects of the JCS policy which are supported by evidence and elements of the Bracknell approach, is a policy which would be sound:

1.29 In our view the suggested policy will not require further consultation for the reasons that it constitutes a modification which simplifies the proposed policy and it simply highlights the Plan-wide target currently found in the supporting text.

## **GYPSIES AND TRAVELLERS**

**K Is policy 4 (as amended by GNDP Focussed Changes 5 7) justified, effective and consistent with national policy?**

1.30 No Comment

**L If the JCS is unsound in relation to accommodation for gypsies and travellers, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation [or sustainability appraisal.]**

1.31 No Comment.

# Matter 02

## Appendices

<b>Appendix 1:</b>	<b>Extract relating to Edmundsbury Core Strategy</b>	<b>12</b>
<b>Appendix 2:</b>	<b>Table 1: GNDP LDS Timetable For Site Allocation DPD'S</b>	<b>14</b>
<b>Appendix 3:</b>	<b>Bracknell Forest Core Strategy (2008) Policy CS17 Affordable Housing:</b>	<b>15</b>
<b>Appendix 4:</b>	<b>Suggested Policy 4: Affordable Housing</b>	<b>16</b>

# Appendix 1

**St Edmundsbury**  
Local Development Framework  
Annual Monitoring Report 2008/9

St Edmundsbury  
Core Strategy  
Submission Document

local development  
framework  
August 2009

**St Edmundsbury Borough Council**  
Planning and Economic Development Services  
December 2009



Annual Monitoring Report 2008/09

In order to monitor how the delivery of the Structure Plan requirement is being met, a simple calculation has been undertaken as follows:

Table 6.7

Suffolk Structure Plan housing requirement	8,800
Minus Housing completions to date	6,351
Residual total	2,449
Divided by remaining years of the Development Plan (7)	350 homes per annum

Table 6.8 below provides an update of Table 1 in the Replacement St Edmundsbury Local Plan 2016. That table sets out the housing requirement in the borough, based on the County Structure Plan, and indicates how this will be met from various delivery components.

Table 6.8 Projected additional dwellings up to 2016 (Structure Plan requirements)

<b>(a) Commitments at 31/3/2009 (planning permissions)</b>	
Bury St Edmunds	818
Haverhill	291
Rural areas	245
<b>Borough total</b>	<b>1354</b>
<b>(b) Remaining Allocated Sites in the Replacement St Edmundsbury Borough Local Plan 2016</b>	
Bury St Edmunds	441
Haverhill	914
Rural Allocations	275
<b>Borough total</b>	<b>1630</b>
<b>(c) Windfall</b>	
Unidentified Urban Capacity Sites	630
Rural windfall estimate (23 pa)	160
Less 5% deduction for non-implementation of permissions	-68
<b>Borough total</b>	<b>722</b>
<b>Total (a) + (b) + (c) =</b>	<b>3706</b>

## Appendix 2

Table 1: GNDP LDS TIMETABLE FOR SITE ALLOCATION DPD's

<b>Broadland LDS (2010)</b>		
	<b>Anticipated Date</b>	<b>Delay</b>
<b>Site Allocation DP</b>	Commencement: Aug 2009 Publication of Submission: May 2011 Submission to SoS: November 2011 Adoption: Spring 2012	LDS identifies a degree of risk based on JCS adoption – which is delayed.  Note para. 4.10 of LDS identifies that a growth area DPD will be replaced by an SPD and there is no timetable attached.
<b>Norwich LDS (March 2010)</b>		
	<b>Anticipated Date</b>	<b>Delay</b>
<b>Site allocations plan</b>	Consultation 1 – Reg 25: Nov 2009 – Jan 2010 Consultation 2 – Reg 25: Aug – Sept 2010 Soundness test – Reg 27: May – June 2011 Submission: Aug 2011 Examination: Nov 2011 Adoption: April 2012	Consultation 1 undertaken but Consultation 2 is delayed until Jan 2011 – March 2011.  Other milestones also moved on by 4 months.
<b>South Norfolk LDS (2010)</b>		
	<b>Anticipated Date</b>	<b>Delay</b>
<b>Site Specific Polices and Site Allocations DPD Wymondham and Long Stratton AAP</b>	Reg 25 Consultation: September 2010 Publication of Submission: May 2011 Submission to SoS: September 2011 Examination: March 2012 Adoption: July 2012	Current Consultation at present re. Site Allocations and Wymondham/Long Stratton AAP

## Appendix 3

Bracknell Forest Core Strategy (2008) Policy CS17 Affordable Housing:

***'Policy CS17: Affordable Housing***

195 *Affordable housing in the Borough comprises affordable rented and intermediate housing. The Council will:*

- i. require residential developments on suitable sites to provide affordable housing which is accessible to local people in priority housing need;*
- ii. state the threshold above which affordable housing is sought;*
- iii. state the amount of affordable housing to be provided on suitable sites above the threshold.*

***Implementation***

196 *This policy will be implemented through:*

- Subsequent policies and guidance in further Local Development Documents;*
- Partnership working with developers, other local authorities, Registered Social Landlords and the Strategic Housing Partnership;*

*Determination and monitoring of planning applications and appeals for residential development including where appropriate S106 agreements.'*



## Appendix 4

### Suggested Policy 4: Affordable Housing

#### **Policy 4 'Affordable Housing'**

The provision of affordable housing will be measured against a target that 33% of housing completions across the GNDP area will be affordable. A proportion of affordable housing will be sought on all sites of 5 or more dwellings (or 0.2 hectares or more). The proportion of affordable housing, and mix of tenure sought, will be the subject of negotiation having regard to evidence of the need for affordable housing, issues of economic viability, the achievement of other planning objectives, the availability of public funding at the time of consideration and the need to ensure mixed and sustainable communities can be developed.

Following an updated SHMA the GNDP will produce an Affordable Housing DPD (SPD?) to inform this policy. It will cover:

- Tenure divisions for different parts of the GNDP area
- Guidance on appropriate affordable unit sizes
- Guidance on the amount of affordable housing to be sought on suitable sites above the threshold
- Guidance on developer contributions in-lieu of on-site provision of affordable housing