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Dear Mr Foster and Mr Fox

### **Response to Inspector's Changes to the GNDP Joint Core Strategy on Behalf of Timewell Properties Ltd**

Bidwells has been instructed by Timewell Properties Ltd to submit representations to the JCS Inspector's Changes in relation to their site promotion at Little Melton.

Timewell Properties Ltd wishes to make the following observations and comments on the Inspector's suggested changes:

#### **Inspector's Change IC1: Flexibility/Resilience of the JCS in relation to the Northern Distributor Road.**

Timewell Properties Ltd supports the Inspector's suggested change to the JCS concerning Contingency (JCS Policy 20, page 63) particularly that "*Delay in the delivery of the NDR does not prevent JCS provision of housing or employment development within Norwich City or South Norfolk Council areas...*".

#### **Inspector's Change IC6: Affordable Housing**

Timewell Properties Ltd objects to the continuation of the 40% affordable housing target in the JCS, on the basis that it is not supported by robust and credible evidence and that it is an unachievable target given the likely absence of any public subsidy for the foreseeable future.

The DJD Affordable Housing Viability Study (July 2010) is based on inaccurate and unrepresentative assumptions on development costs and land values. The follow up Statistics Document (December 2010) demonstrates that even with a reduced target of 33% affordable homes, only 55% of all development schemes will remain viable without public subsidy. With the assistance of public subsidy only 77% prove to be viable. The target of 40% is therefore clearly unviable in the vast majority of cases without public subsidy.

In light of these findings, and given the questionable assumptions in the DJD report, the affordable homes target of 40% affordable homes provision from qualifying sites cannot be properly justified. The target is too high and unrealistic, particularly at a time where scheme viability is under pressure due to falling house prices and increasing costs.

The affordable housing target should be reduced to a level that is viable in the majority of case after taking into account realistic assumptions on development costs, land values etc.

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Maintaining an unrealistic target of 40% as the starting point for any negotiations with the Council will more than likely make negotiations protracted, as the realistic level of affordable housing provision based on more accurate assumptions is likely to be considerably less.


It is possible that the Council will perceive a reduction from 40% to a considerably lower, yet more realistic figure (25% has been accepted by South Norfolk Council in recent negotiations) as too much of a concession. The result being that development schemes will not come forward and housing needs will not be met.

We suggest that a lower starting point reflecting the exiting affordable housing need (i.e. 33%) would make a more reasonable starting point for negotiations, and make any necessary further reductions in provision to reflect scheme viability less of a concession and more palatable to the Council.

Also, the proposed tenure split of 85% social rented and 15% intermediate tenures is less relevant to settlements outside of the Norwich urban area. In villages such as Little Melton, there are greater requirements for intermediate tenures. A 60/40 tenure split would be more appropriate for settlements outside of the Norwich urban area.

I trust these comments are useful. If you need any further assistance please get in touch with me in the first instance.

Yours sincerely



**John Long**  
Senior Planning Associate

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