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 Date: 27th January 2011

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Dear Mr Foster and Mr Fox

Response to Inspectors' Changes to the GNPD Joint Core Strategy on Behalf of Sunguard Land Ltd

Bidwells has been instructed by Sunguard Land Ltd to submit representations to the JCS Inspectors' Changes in relation to their site promotion at Tharston, Long Stratton.

Sunguard Land Ltd wishes to make the following observations and comments on the Inspectors' suggested changes:

Inspectors' Change IC1: Flexibility/Resilience of the JCS in relation to the Northern Distributor Road.

Sunguard Land Ltd supports the Inspectors' 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...*". Sungard Land Ltd also suggests that any delays in the delivery of the Long Stratton bypass would not prevent provision of non-strategic housing proposals in the 'developed' part of Tharston immediately adjacent to Long Stratton.

Inspectors' Change IC2 and IC3: Policy 3 and Paragraphs 5.13-5.18

Sunguard Land Ltd objects to the requirement for proposals over 10 dwellings to be supported by separate Sustainable Energy Statements. This goes beyond the guidance in the PPS1 supplement on Planning and Climate Change, 2007 (paragraphs 11 and 41), which suggests specific and standalone assessments of new development should not be required where the necessary information can be made available through Design and Access Statements.

Also, Sunguard Land Ltd suggest that instead of the revised policy requiring the submission of a Sustainable Construction Statement alongside planning applications, it should suggest that Design and Access Statements include information that practicable steps have been taken to achieve nationally described sustainable buildings standards, in line with paragraph 32 of the PPS 1 supplement (2007).

1 Inspectors' Change IC4: Monitoring Framework

No Comment

2 Inspectors' Change IC5: Glossary

No Comment

3 Inspectors' Change IC6: Affordable Housing

Sunguard Land Ltd object to the continuation of the 40% affordable housing target, on the basis that it is not supported by robust and credible evidence and it is currently undeliverable.

The DJD Affordable Housing Viability Statistics document demonstrates that even with a target of 33% affordable homes, only 55% of all schemes will remain viable without public subsidy. Even with the assistance of public subsidy only 77% prove to be viable. The target of 40% is 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 target of 40% affordable home provision cannot be 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. Its retention could require extensive and probably abortive negotiations which will inevitably result in delays to the approval of otherwise acceptable development which would be unfortunate, particularly at a time of exceptionally low housing starts.

Also, the tenure split of 85% social rented and 15% intermediate tenures is less relevant outside of the Norwich urban area. In more rural areas such as Tharston, there are increased requirements for other intermediate tenures. A 60/40 tenure split would be more appropriate outside of the Norwich City Council area.

Conclusions

- 1 The Inspectors' changes concerning the JCS's contingency are supported.
- 2 The changes to Policy 3 should require the necessary information to be provided in the Design & Access statements, rather than in separate documents in line with PPS 1 and its supplement.
- 3 The DJD Affordable housing evidence is less than robust, and some of the assumptions are questionable and it does not adequately justify a 40% affordable housing target. Such a target is undeliverable in most cases and will continue to be so in the foreseeable future.

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. This figure is more likely to be around the 25% mark and is the target figure generally being used by the Greater Norwich Partnership Authorities as a basis for negotiations on current proposals.

The tenure split should also be more flexible in the rural area to reflect the different requirements of people living in villages compared to Norwich City. A 60/40 split between social rented and intermediate tenure should be adopted.

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

Yours sincerely


Glyn Davies
Partner

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