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Dear Louise

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 AS AMENDED

PLANNING AND COMPULSORY PURCHASE ACT (2004)

JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK DEVELOPMENT PLAN DOCUMENT

PUBLIC EXAMINATION - INSPECTOR'S CHANGES TO BE ADVERTISED

REPRESENTATIONS MADE BY SAVILLS (L&P) LTD ON BEHALF OF THE EASTON LANDOWNERS CONSORTIUM IN RESPECT OF:

- (A) **POLICY 4: HOUSING DELIVERY (AFFORDABLE HOUSING)**
- (B) **GREEN INFRASTRUCTURE DIAGRAM (DOCUMENTS RF25a AND RF25b)**

Further to your letter of the 30 December 2010 and the relevant papers enclosed with that letter, I would be very grateful if you could acknowledge receipt of the following representations that we submit to you on behalf of our client, the Easton Landowners Consortium.

Easton Landowners Consortium attended the Public Examination at a number of sessions in late 2010 and welcome the opportunity of making necessary comments on the Inspector's Proposed Changes and the supporting information which has influenced such changes.

The Easton Landowners Consortium is concerned about the continuing promotion of the expansion of Easton as a settlement and has previously expressed its support for specific reference for at least 1,000 dwellings at Easton/Costessey in policies 9 and 10 of the JCS. We would also confirm that we made representations relating to affordable housing in respect of both the submitted JCS as well as the Focussed Changes in terms of concern that the 40% of affordable housing had not been justified for larger development schemes. Additionally we expressed concerns that the securing of the requirement for affordable housing in favour of smaller sites (i.e. less affordable housing on such sites) would make the larger development sites less attractive to the market.



IC6 – Policy 4: Housing Delivery (affordable housing)

It is within such a context that we would make the following representations in relation to Policy 4: Housing Delivery (affordable housing).

In confirming in general terms the approach advocated within the Statement of Focussed Changes, the Inspectors asked Drivers Jonas Deloitte to prepare a number of additional sensitivities of the submitted Affordable Housing Viability Study previously prepared by the consultants. Of particular relevance is the viability analysis based on an affordable housing target of 20%, 30%, 33% and 40%, modelled against fixed “trough”, “current” and “peak” value positions. The tables on page 3 of the Drivers Jonas Deloitte supporting information (and which is the supporting information contained within IC6) set out the various proportions of affordable housing in the event that no affordable housing grant funding is available. Clearly if no affordable housing grant is available then this is a major impact when the deliverability of all schemes for affordable housing is required.

In supporting the consultants, the Inspector’s Proposed Changes now seem to suggest that GNDP should be content with a scenario whereby only some 34% of the larger sites will come forward for development assuming a £2,250 psm context. Even assuming that values rise to £2,500 psm then it remains the case that only 59% of the larger development schemes will come forward where 40% affordable housing is deliverable.

If we were to take these 34% and 59% figures across the to the development plan context and suggest that only these percentages of sites would come forward as allocations within a development plan then we would take the view that any Inspector would be highly unlikely to find a plan “sound” given the importance of deliverable sites within a given plan period.

In such circumstances, we consider that reducing the amount of affordable housing to a 30% level in a scenario where there is still no affordable housing grant funding available is the only sensible way to increase the likelihood of sites incorporating affordable housing coming forward. The Drivers Jonas Deloitte tables suggest that a 50% and 70% “success rate” is achievable with a 30% affordable housing level which we consider to be better than the above percentages.

In such a context, we respectfully suggest that any references to 40% within Policy 4 of FC1 should be amended to read 30% with the relevant target proportion text to be amended as follows:

- *“On sites for 5-9 dwellings (or 0.2 – 0.4 hectares), 20% with tenure to be agreed on a site by site basis (numbers rounded upwards from 0.5).*
- *On sites for 10-15 dwellings (or over 0.4 hectares), 30% with tenure to be agreed on a site by site basis (number rounded upwards from 0.5).”*

IC7 – Green Infrastructure (new diagrams to replace that at page 35 of the JCS)

Papers provided by the Inspector propose the insertion of a new diagram within the JCS headed “Proposed Green Infrastructure Network for the Greater Norwich Area”. This is intended to replace the diagram referred to as “Strategic Green Infrastructure” on page 35 of the JCS.

It is clear that the content of the new inserted plan relating to Green Infrastructure Corridors is intended to correlate with those areas which support key growth locations. Page 69 of the existing JCS headed “Green Infrastructure Priority Areas Supporting Key Growth Locations” confirms that those priority areas for green infrastructure are heavily influenced by the identification of the new growth locations in and around the identified key growth locations and it is therefore vitally important that the identification of such green infrastructure does not thwart the future developments coming forward within the plan period.

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At this juncture, we would confirm our support for green infrastructure as a matter of principle not least because of the important functional role it plays in terms of new development but of course the importance of it being provided through appropriate contributions from development schemes.

Our concern with the new plan to be inserted with the JCS is a lack of clarity on both the definition of green infrastructure corridors and the importance of ensuring that readers of the document acknowledge that such corridors are clearly indicative at this stage.

In respect of the definition of the “green infrastructure corridor”, we cannot find any reference within the JCS where such a term is defined – in this context we note that there is a term for “green infrastructure” within Appendix 8 to the JCS and it is our assumption that any such corridor would be made up of those terms referred to in that glossary. For the sake of clarity and completeness we suggest that the reference within the Appendix should be amended to be headed “Green Infrastructure and Green Infrastructure Corridors”.

Turning to the interpretation with the new plan within the JCS, we are concerned that in the absence of any confirmation that such corridors are indicative, readers of the document may interpret these corridors rather too literally and this is particularly the case at Easton/Costessey which is a defined key location for growth as set out within the JCS.

With at least 1,000 houses being identified for Easton/Costessey, it is important that the Core Strategy does not define the actual corridor, but rather leave the detailed definition of such a corridor to Local Development Documents to be prepared by the local Council.

Our concern is that the current alignment of the corridor through Easton when applied at a detailed scale could be seen to cut through existing and proposed development areas when this is clearly at variance with the intention of providing green infrastructure alongside new development.

In order to satisfy our concerns, we would recommend the insertion of text under the Plan key to read “The detail of the above notations are illustrative within this Plan and relevant detailed boundaries will be shown in relevant Local Development Documents”.

We hope that the Inspectors will consider these representations and amend the Plan accordingly.

We look forward to being kept informed of progress with regard to the JCS.

Kind regards.

Yours sincerely

Garth Hanlon BSc (Hon) MRTPI
Director

cc. Mr D Lawrence (Easton Landowners Consortium)
Mr C Campbell (Savills (L&P) Ltd)