

By post and e-mail

Regeneration and Development  
Norwich City Council  
City Hall  
Norwich  
NR2 1NH

18 May 2010

Dear Mr Osborn

**Preliminary response from Nigel Jones on Greater Norwich Affordable Housing**

Further to our brief conversation on 13<sup>th</sup> May about the above note I am writing to you to request clarification is provided on the purpose of the note on affordable housing viability issues dated 11th May produced by N L Jones for the Inspectors in consideration of the Greater Norwich Joint Core Strategy (JCS). My specific concerns relate solely to the potential implications of the note for the implementation of Norwich City Council's existing, adopted, affordable housing policy, and I would be grateful if you could raise this matter with the Inspector at your earliest convenience. Any matters related to the implications for emerging policy in the JCS will, of course, be addressed through the Examination process via the Greater Norwich Development Partnership.

Mr. Jones' note was in response to the Inspectors' questions on the evidence base to support emerging planning policies on affordable housing for greater Norwich through the submission version of its Joint Core Strategy. These questions related to the interpretation of government policy on viability of affordable housing in PPS3, as tested through the "Blyth Valley case" and the robustness of the GNDP evidence of which the Drivas Jonas study conducted in 2009 for Norwich City Council formed a part.

In part of this response Mr Jones describes the Drivas Jonas study as being "fundamentally flawed". I am concerned that the note is insufficiently clear in drawing the conclusion that this finding only relates to the robustness of the study insofar as the JCS is concerned and therefore could create a considerable risk to the future delivery of affordable housing in the city. This would undermine a very significant political priority.

The research by Drivers Jonas was undertaken specifically to support the development of the "Affordable Housing Supplementary Planning Document (SPD)" pursuant to Norwich City Council's affordable housing policy HOU4 in the City of Norwich Replacement Local Plan (adopted 2004), it was not intended to inform JCS policy 4 although it clearly has some relevance to this. The approach used in the

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study was specifically devised in the light of the circumstances in the City (with no available Greenfield sites and a limited range of market conditions) and it excluded smaller sites as HOU4 only requires any provision of affordable homes on sites providing 25 homes or more. Given this I still regard it as robust in informing our current policy approach and consider it reasonable and consistent with the principles of the Blyth Valley case.

Given the potential for challenge to Norwich City Council's adopted planning policy on affordable housing, I would, therefore, be grateful for clarification to be issued to confirm that the comments of Mr Jones' note were only intended to apply to the robustness of the Drivas Jonas report insofar as it supports the JCS policies and in no way sought to comment on the validity of the report in relation to our current SPD.

Yours sincerely

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