

Greater Norwich Local Plan

Hearing Statement

Matter 6 – Homes (Policy 5)

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP). The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

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The Councils have responded to each question directly in the body of the Hearing Statement.

Issue 1: Is the policy for affordable housing justified, effective and consistent with the evidence and national policy?

Question 1

Are the requirements for affordable housing set out in Policy 5 justified by the evidence?

Response to question 1 -

1. Yes, the affordable housing requirement is considered justified.
2. The evidence in relation to affordable housing need can be found in Greater Norwich Local Housing Needs Assessment 2021 ([B22.3](#)). Chapter 8 includes the final conclusions at paragraphs 8.15-8.20 and in Table 51. The figure for affordable housing need of 518 dwellings per annum is a net figure and represents 26.3% of the Local Housing Need (LHN) of 1,972 per annum. However, when right to buy sales are factored in the overall need for new affordable housing rises to 670 per annum, or 34% of the total housing need for Greater Norwich as a whole (paragraph 8.24).

Question 2

Is the 33% requirement across the Plan area outside of Norwich City Centre justified by the evidence?

Response to question 2 -

3. Yes, the 33% affordable housing requirement is considered justified.
4. As discussed in the previous question, the evidence in relation to affordable housing need can be found in Greater Norwich Local Housing Needs Assessment 2021 ([B22.3](#)), paragraphs 8.15-8.20 and in Table 51. When the affordable housing need of 518 dwellings per annum are added to the typical 152 right to buy sales per annum the overall need for new affordable housing rises to 670, or 34% of the total housing need for Greater Norwich as a whole (paragraph 8.24). The affordable housing requirement is set lower in Norwich City Centre as a pragmatic judgement, based on viability considerations (see response to question 3 below).

Question 3

Is the 28% requirement for Norwich City Centre justified by the evidence? What is the evidence which leads to this being a lower figure than that for the plan area?

Response to question 3 -

5. Yes, the Partnership felt it had no pragmatic alternative but to set a lower figure than for the rest of the plan area. This is despite the fact that affordable housing need is highest in Norwich, at 42% of the total housing required ([B22.3](#), Figure 53).

6. The viability considerations mean that on some brownfield sites 28% affordable housing will be the maximum achievable. The supporting evidence for this is found in the Viability Appraisal ([B26.3](#)), which was published in December 2020; and, specifically for brownfield development is further explored in a Supplementary Appendix to the 2020 Viability Appraisal ([B26.5](#)), which was published in May 2021.
7. The Supplementary Appendix ([B26.5](#)) re-emphasised how 28% affordable housing is likely to be the maximum achievable on some sites. For example amongst the findings, a 50-home scheme on a 0.5 ha site could provide 26% affordable housing when setting developer's profit at 17.5% and providing a 20% uplift on the site's Existing Use Value (EUV).
8. The following is taken from the Executive Summary of Document B26.5.

| Typology | Description | No. Dwellings | Gross Site Area Ha | Viability at 17.5% Developers Profit | Viability at 20% Developers Profit |
|----------|--------------|---------------|--------------------|--|---|
| 3b | Urban | 50 | 1.00 | 34% AH at 30% uplift EUV | 34% AH at 20% uplift EUV 28% AH at 30% uplift EUV |
| 4a | Urban Centre | 20 | 0.25 | 20% AH at 25% uplift EUV 15% AH at 30% uplift EUV | 15% AH at 20% uplift EUV 10% AH at 25% uplift EUV 0% AH at 30% uplift EUV |
| 4b | Urban Centre | 50 | 0.50 | 26% AH at 20% uplift EUV 20% AH at 30% uplift EUV | 20% AH at 20% uplift EUV 16% AH at 30% uplift EUV |

EUV = Existing Use Value
AH = Affordable Housing

Question 4

Policy 5 allows for a viability assessment to be submitted at decision-making stage for brownfield sites. Is this approach justified and consistent with national policy?

Response to question 4 -

9. Yes, the Partnership considers its approach to be consistent with national policy. Planning Practice Guidance (PPG) Paragraph 007 ([ID: 10-007-20190509](#)) discusses how certain circumstances may exist “*where further information on infrastructure or site costs is required*”. The GNLP’s approach is in line with this.
10. The Viability Appraisal study ([B26.3](#) see paragraph 240) put considerable effort into understanding the extra allowance needed for brownfield development. This included an allowance of £100,000 for typology 4 (Urban Centre 0.25 ha) and £200,000 for typology 7 (Urban Centre 0.5 ha). But, as is acknowledged in paragraph 236, the costs of remediating a brownfield site can vary widely and will be influenced by many risk factors; and so, the approach policy 5 takes is considered justified.

Question 5

Is the requirement for all housing development proposals to meet the Nationally Described Space Standard for internal space justified?

Response to question 5 -

11. Yes, applying the Nationally Described Space Standard (NDSS) is justified. Paragraph 37 of the Homes Topic Paper ([D3.6](#)) explains that the Partnership’s approach complies with the [PPG on optional technical standards](#).
12. Appendix B of the Homes Topic Paper ([D3.7](#)), which was written in 2019, studied 16 different permitted schemes, equalling 245 properties. It concludes that implementing the NDSS would represent a positive regulatory intervention. Paragraph 6 of the appendix explains that the NDSS is needed to address the needs of an ageing population, and that bedrooms should be of a useable size. Paragraph 9 points out that all typologies in the Viability Appraisal ([B26.3](#)) modelled NDSS requirements. Finally, paragraph 11 notes that an adequate transition period has been provided as the 2018 Growth Options consultation consulted on implementing the NDSS through the local plan.

Question 6

Is the requirement for purpose-built student accommodation to provide the same percentages of affordable housing justified, practicable and deliverable and is it consistent with national policy?

Response to question 6 -

13. For clarity, the requirement referenced above is as follows (specifically bullet point 5): *Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:*
- *be in a location otherwise suitable for residential development with sustainable access to the institutions served;*
 - *be of a scale large enough to provide for high standards of student welfare;*
 - *contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities;*
 - *provide a mix of accommodation types for a wide range of students; and*
 - *make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents.*
14. Regarding bullet point 5: This is considered justified as set out in Topic Paper for Policy 5: Homes ([D3.6](#)) at:
- a. Paragraphs 50-54 in accordance with the evidence in Norwich City Council's affordable housing SPD ([C1.11](#)). The relevant paragraphs in the SPD are 2.20 to 2.27. Also, this is in accordance with Norwich City Council's advice note on purpose built student accommodation ([C1.12](#)), for which the relevant paragraphs are 5.47 and 5.48.
 - b. Paragraph 71 in accordance with evidence in the Greater Norwich Local Housing Needs Assessment ([B22.3](#)) – the relevant paragraphs in this document are 9.16 – 9.20.
15. Norwich City Council's Affordable Housing SPD and Advice Note outline that purpose-built student accommodation is often proposed on sites that could otherwise be developed for general needs housing, which would include affordable housing as part of the tenure mix. Policy 5 takes account of the high need for affordable housing within Norwich and the potential loss of affordable housing provision through purpose-built student accommodation development in place of general needs housing. Therefore, Policy 5 is considered justified in requiring affordable housing contributions from purpose-built student accommodation development.
16. Regarding bullet point 5: The viability evidence documents ([B26.1](#), [B26.2](#), [B26.3](#), [B26.4](#) and [B26.5](#)) do not specifically include an assessment on the viability of purpose-built student accommodation as typically this type of accommodation is not developed on a typology basis. The approach to requiring affordable housing contributions from purpose-built student accommodation development is considered justified as set out in paragraphs 14 and 15 above. However, brownfield sites are all unique with a wide variety of constraints which can affect development viability. Therefore, the delivery of affordable housing contributions will be dealt with at application stage through the

submission of viability appraisals which are site and development specific. This approach is set out in Topic Paper for Policy 5: Homes ([D3.6](#)) at paragraph 54.

17. This approach is considered to be consistent with national policy (paragraph 63 of the NPPF) as off-site provision in the form of a commuted sum has been justified as set out in paragraphs 14 and 15 above. The policy 5 approach is considered to contribute to the objective of creating mixed and balanced communities, as set out in paragraphs 50-54 of the Topic Paper for Policy 5: Homes ([D3.6](#)) in accordance with the evidence in Norwich City Council's affordable housing SPD ([C1.11](#)).

Question 7

Paragraph 281 of the Plan states that potentially the provision of affordable housing in relation to student accommodation could be in the form of a commuted sum and this is stated in the section of the policy under the heading 'Purpose Built Student Accommodation'. However, the section in the policy under the heading 'Affordable Housing' requires affordable housing on site other than in exceptional circumstances? Therefore is the policy sufficiently clear as to be effective?

Response to question 7 -

18. Given that the evidence relied upon to justify the provision of affordable housing on purpose built student accommodation schemes allows for the provision of affordable housing off-site through a commuted sum, as set out in paragraph 1.19 in Norwich City Council's SPD ([C1.11](#)) and paragraph 5.48 in Norwich City Council's advice note ([C1.12](#)), the local authorities propose a main modification for clarity to policy 5 as follows:

Major residential development proposals ~~and purpose-built student accommodation~~ will provide:

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, or where*
 - a) the site is allocated in a Neighbourhood Plan for a different percentage of affordable housing, or*
 - b) for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage;*
- affordable housing on-site except where exceptional circumstances justify off-site provision;*
- a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;*
- affordable housing of at least equivalent quality to the market homes on-site.*

Proposals for purpose-built student accommodation will be required to pay a commuted sum sufficient to provide an equivalent off site policy compliant affordable housing scheme that would otherwise be expected on site if the site were developed for general needs housing.

The sub-division of a site to avoid affordable housing provision will not be permitted.

19. This modification also helps address points raised about PBSA and affordable housing, such as the representation from Bidwells/UEA (Rep: 24074).
20. A further main modification to policy 5 at the fifth bullet point under the Purpose-Built Student Accommodation heading is proposed to improve clarity on which sites the policy applies to:

*make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing. ~~Such provision may be made off-site through a commuted sum as set out in supplementary planning documents.~~ **Such provision would be required off-site through a commuted sum.***

21. In addition, a further change to paragraph 281 of the supplementary text to policy 5 is also proposed to ensure it is in line with the changes suggested above:

The policy also aims to ensure that purpose-built student accommodation is provided to meet growing needs at the UEA and in other locations with good access to the educational facilities they will serve, including Norwich University of the Arts. The policy content and the sites allocated for student accommodation are informed by the UEA Development Framework Strategy⁹⁷. Purpose-built student accommodation development is required to make provision for affordable housing that would be expected on the specific site if it were to be developed for housing, ~~potentially~~ through a commuted sum. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.

Question 8

Is the requirement for specialist older people's accommodation, including care homes, to provide an affordable housing contribution justified and consistent with national policy?
Have these requirements been subject to viability testing?

Response to question 8 -

22. As is stated in the Homes Topic Paper (Document [D3.6](#), paragraph 40), the Partnership applies the reasoning that older person's housing is still a dwelling even though it comes with care services, and consequently considers its approach to be justified and consistent with national policy. This approach reflects the judgment in

Holgate J in Rectory Homes Limited v Secretary of State for Housing, Communities and Local Government (case number: [CO/4682/2019](#)).

23. Viability testing has not been completed for specialist older people's accommodation. However, our viability consultants are now doing this work and the results will be ready at the end of January, in advance of the hearing sessions beginning. This work will focus upon the supported living/sheltered housing model, of which leaders in the market are McCarthy Stone and Churchill Retirement Living.

Question 9

Is the requirement for 10% of the affordable housing to be for affordable home ownership justified? Is this requirement sufficiently clear for the policy to be effective?

Response to question 9

24. Yes, the Partnership considers the policy to be justified as it reflects the requirement in paragraph 65 of the NPPF. It is anticipated that each of the local authorities in the Partnership will negotiate affordable housing obligations that are broadly in line with the NPPF.
25. Of relevance too is that local evidence found in the Greater Norwich Local Housing Needs Assessment 2021 ([B22.3](#)) which is broadly in line with the NPPF. The Needs Assessment shows at Figure 51 that 8% (or 153 households a year) aspire to home ownership.

Question 10

Are the respective affordable housing targets achievable and deliverable?

Response to question 10 -

26. Yes, housing enabling officers from each of the three Greater Norwich authorities have provided the latest information on affordable housing completions and have forecasted supply for the upcoming years (see [D3.6](#), paragraphs 76-77; and [D3.7](#) Appendix D Affordable Homes Completions and Forecast). The data forecasts 460 affordable homes in 2021/22, 714 in 2022/23, 895 in 2023/24, 631 in 2024/25, and 613 in 2025/26. This evidence shows that the pipeline of future affordable housing supply is already growing.

Question 11

Does the policy sufficiently recognise the need for viability considerations? Has the impact of affordable housing requirements on the viability of schemes been robustly assessed?

Response to question 11 -

27. Yes, viability considerations are recognised. The supporting evidence is found in the Viability Appraisal ([B26.3](#)), which was published in December 2020; and, specifically for brownfield development, is further explored in a Supplementary Appendix to the 2020 Viability Appraisal ([B26.5](#)), which was published in May 2021.
28. The final Viability Appraisal report tested 11 typologies and found each one to be viable and able to meet affordable housing obligations, except for the brownfield urban typology of 20 dwellings. The Supplementary Appendix then tested a further three brownfield typologies, for which the viability thresholds are summarised on page 1 of [B26.5](#). For example, a 50-home scheme on a 0.5 ha site could provide 26% affordable housing when setting developer's profit at 17.5% and providing a 20% uplift on the site's Existing Use Value (EUV).

Issue 2: Accessible and Specialist Housing

Question 1

Does the Plan make adequate provision for older person's accommodation?

Response to question 1 -

29. Yes, the local plan makes adequate provision for older person's accommodation.
30. The GNLP Strategy ([A1](#)) provides the upmost flexibility to allow specialist older people's accommodation to be permitted by virtue of the wording in Policy 5: Homes, which says "*sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use*".
31. The GNLP Sites document allocates sites specifically for older person's accommodation. This work is described in detail as part of Appendix A to the Homes Topic Paper ([D3.7](#)), and it led to specific allocations for Extra Care Housing in the City Centre, Colney, Taverham, Aylsham and Harleston. Paragraph 8 of Document D3.7 explains that the supply of 435 units of Extra Care Housing when added to the new allocations of 560 units equals 995 units which gives a supply of 8.6 years against Norfolk County Council's Living Well Strategy, or 22.1 years when compared to the latest Local Housing Needs Assessment.
32. Not all of the sites which were submitted to the GNLP for consideration for development for older person's housing have been allocated. The Homes Topic Paper

([D3.7](#) see paragraphs 11-15) explains the consistent approach taken to site selection which applies to all sites irrespective of the age profile of future residents, including access to facilities, social inclusion and sustainability.

Question 2

What do 'supported' and 'encouraged' mean in respect of this part of the policy? Is the policy sufficiently clear as to be effective?

Response to question 2 -

33. The Partnership thinks that the policy as drafted is sound, but that the wording could be more explicit to assist development promoters and planning application case officers. On this basis the inspectors may wish to consider a main modification, for which the following wording is suggested:

Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be ~~supported~~ permitted on sites with good access to local services, including on sites allocated for residential use unless there are significant adverse impacts that justify a refusal of planning permission.

Proposals ~~are particularly encouraged~~ for specialist housing will be permitted where Norfolk County Council identifies a strategic need for extra care housing unless there are significant adverse impacts that justify a refusal of planning permission.

Question 3

Is the requirement of at least 20% of homes on major housing development sites to conform to the Building Regulations M4 (2)(1) standard justified?

Response to question 3 -

34. Yes, the standard is justified, given the context of an ageing population and that in the future people will benefit from more accessible and adaptable homes.
35. The recently published study by Three Dragons and ORS into older person's accommodation needs explains this ([B22.4](#) see page 41, figure 3.7). It shows a minimum need for 11,557 adapted homes across the Greater Norwich area over the period 2016-2041. This is equal to 28% of the Greater Norwich Local Housing Need (LHN) of 40,541 homes.
36. Also, the financial cost of providing at least 20% of homes to Building Regulations M4 (2) was factored into the typology-based viability appraisals that support the local plan. This work can be found in the Viability Appraisal published in December 2020 ([B26.3](#),

paragraph 216) and it demonstrates that the M4 (2) requirement is equal to £1,400 per property and will not harm the commercial return from development.

Issue 3: Gypsies and Travellers, Travelling Show People and Residential Caravans

Question 1

Is the evidence base supporting the identified need for residential pitches and Travelling Showpeople plots robust, taking into account factors such as existing provision, household growth, hidden need (those in bricks and mortar housing), unauthorised sites and encampments and any engagement with the gypsy and traveller community?

Response to question 1 -

37. Yes, the evidence is robust. An Accommodation Needs Assessment was undertaken in 2017 by RRR Consultancy ([B8.1](#)), with subsequent updates.
38. For Gypsies and Travellers, paragraph 6.4 of the 2017 study explains how RRR Consultancy followed a 15-step model for assessing need, which is in line with the 2007 DCLG guidance on conducting Gypsy and Traveller Accommodation Needs Assessments. The 15-step methodology factored in the matters raised in this question, such as existing provision (step 1), unauthorised sites and encampments (steps 10 and 11), household growth (step 14), those in bricks and mortar housing (step 15).
39. For Travelling Showpeople, paragraph 7.5 of the 2017 study explains how the Showmen's Guild and several residents were consulted. Furthermore, in November 2021, the Partnership signed a Statement of Common Ground (SoCG) with the Guild ([D4.5](#)). The SoCG sets out the mutual agreement on: 1. Needs Evidence; 2. The Approach to Policy; and, 3. Commitment to the Delivery of Sites.
40. For residential caravan dwellers, paragraph 11.3 of the 2017 study explains how data was gathered. Statistical data was gathered from the local authorities and then telephone consultation was undertaken with caravan site owners and managers in order to confirm the number of residential and holiday pitches on each site.
41. In addition to the 2017 study, RRR Consultancy produced a Gypsy and Travellers Addendum ([B8.2](#)) that was published in January 2021. This addendum clarifies how the Partnership is applying the definition of needs as set out by the Planning Policy for Traveller Sites 2015 (PPTS 2015). The addendum includes interim accommodation needs figures up until the local plan's end date in 2038.
42. RRR Consultancy is currently working on providing the latest needs evidence for the Partnership. This full update of the Accommodation Needs Assessment will be ready shortly after this response to the MIQs has been submitted on 17th January 2022.

Question 2

Is there any evidence that the need for gypsy and traveller pitches has changed since the GTAA was published in 2017?

Response to question 2 -

43. The Partnership reappointed RRR Consultancy in 2020. A full update of the 2017 study will be ready shortly after the Partnership has sent this response to the MIQs on 17th January.

Question 3

Is the use of a criteria-based policy justified when there is evidence of a clear need for significant pitch provision? Is this approach consistent with national policy? The Partnership is undertaking work to identify sites. Why were sites not included within the Plan? Is it just a timing issue?

Response to question 3 -

44. Yes, the lack of allocations in the local plan for Gypsy and Traveller sites was a timing issue, reflecting the fact that no such sites were submitted through the plan-making process. The Topic Paper for Policy 5: Homes ([D3.6](#)) explains that consultation questions were asked about increasing the supply of pitches and plots, but no sites for Gypsies and Travellers were proposed at any stage of Regulation 18 between 2018 and 2020.
45. The Partnership is now actively seeking sites to rectify this, recognising that there is a likely need for pitch provision through allocations. It also recognises that paragraph 10 of the PPTS 2015 requires specific deliverable sites for 5 years, as well as developable sites for years 6 to 10 (and where possible years 11-15).

Question 4

Has a rigorous search been undertaken to identify all potential sources of gypsy and traveller sites, including areas of search?

Response to question 4 -

46. The Topic Paper for Policy 5: Homes ([D3.6](#)) explains the various stages of public consultation at Regulation 18, between 2018 and 2020, and that this included work to find Gypsy and Travellers sites. The search was rigorous but proved unsuccessful because no landowner or site promoter came forward with a Gypsy and Traveller site.
47. The Partnership is now concentrating on what publicly owned land it can bring forward. This work is promising, and the Partnership expects to identify possible Gypsy and Traveller sites on which public consultation could be based.

48. The need for, timelines and details of any forthcoming focused consultation on Gypsy and Traveller sites are yet to be agreed. Dependent on the approach advised by the Inspectors, the Partnership anticipates being in a position to provide more information late in January 2022.

Question 5

Have neighbouring authorities been formally approached to ascertain whether they are able to meet the Council's unmet need for gypsy and traveller accommodation?

Response to question 5 -

49. No, neighbouring authorities have not been formally approached about being able to meet the Partnership's unmet Gypsy and Traveller accommodation needs. This results from agreements made through the Norfolk Strategic Planning Framework (NSPF) ([B2.2](#)). Page 48 of this document explains that each Norfolk authority will deliver at least its own local housing need within its own boundaries, including for specialist accommodation such as for Gypsies and Travellers.
50. The only exception is in respect of boat dwellers where the need for 63 additional permanent residential moorings during the period 2017-2036, as identified by RRR Consultancy in their 2017 study ([B8.1](#)), is being met by policies and permissions in the Broads Authority area. Confirmation of this is contained within Appendix 6b) of the Duty to Cooperate Statement ([A9.1](#)) in an email from the Broads Authority.

Question 6

Is there compelling evidence that a criteria-based policy will deliver the number of pitches in the appropriate locations to meet demonstrable need?

Response to question 6 -

51. As set out in the response to question 5, the Partnership now accepts that there is likely to be a need to allocate sites to meet the need for pitches. This is partly due to the timescales for sites to be considered through the development management process, so a criteria-based policy alone may not fully address those needs.

Question 7

Is it justified for Policy 5 to apply criteria to Gypsy and Traveller sites, Travelling Show People sites and residential caravans that do not apply to bricks and mortar housing?

Response to question 7 -

52. As explained in paragraph 279 of the GNLP Strategy ([A1](#)), the criteria-based policy allows delivery of new and expanded suitably located Gypsy and Travellers sites.

53. The more flexible approach that is applied to Gypsy and Traveller sites is evident in existing policies. In South Norfolk, the additional flexibility is provided by policy DM 3.3 ([C1.8](#)), which can be applied to sites both inside and outside settlement boundaries. In Broadland, there is similar flexibility too ([C1.3](#)). Policy H6 says proposals outside settlement limits will be permitted that are within reasonable proximity to community facilities provided there are no significant adverse impacts.

Question 8

What does 'safe and sustainable access to schools and facilities' mean? Is this wording effective?

Response to question 8 -

54. Yes, this wording is thought to be effective, and will prevent the location of Gypsy and Traveller sites in isolated locations. Locating development in reasonable proximity to schools and facilities is a key consideration for the Partnership and is evident in all of the site assessment booklets ([B1.1 to B1.63](#)) on which the GNLP Sites Plan is based. In practice the criteria 'safe and sustainable access to schools and facilities' means that when planning applications for Gypsy and Traveller sites are submitted, the case officer has to determine what facilities are within a walkable distance along a footpath.

Issue 4: Purpose built Student Accommodation

Question 1

What does 'will be supported' mean in the policy in relation to development proposals at UEA? Should this be 'permitted' in order that the wording of the policy would be effective in seeking to secure student accommodation?

Response to question 1 -

55. The Partnership accepts and supports the suggestion to replace the word 'supported' with 'permitted'.

Question 2

Are the requirements for proposals away from the UEA campus justified and are they likely to be effective?

Response to question 2 -

56. For clarity the requirements referenced above are as follows
Away from UEA campus, proposals for purpose-built student accommodation will be

supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:

- *be in a location otherwise suitable for residential development with sustainable access to the institutions served;*
- *be of a scale large enough to provide for high standards of student welfare;*
- *contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities;*
- *provide a mix of accommodation types for a wide range of students; and*
- *make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents.*

57. Regarding bullet point 1 (*“be in a location otherwise suitable for residential development with sustainable access to the institutions served”*): This is considered justified as historically the majority of university accommodation for students has been located on the UEA campus, but that pattern is changing and a significant amount of new PBSA has been provided in the city centre in recent years to serve both UEA and NUA. It is appropriate to locate student accommodation where it has good access to existing local facilities and amenities. For sustainability purposes PBSA should be in an accessible location for higher education institutions and accessible by sustainable transport modes (including bus transport, cycling and walking) and where possible be car free or low car developments. The *‘Purpose-built student accommodation in Norwich: Evidence and best practice advice note’* cites evidence that students place a high priority on location/walking distance to campus and service provision, as such this requirement is considered to be likely to be effective. Further detail is set out in Topic Paper for Policy 5: Homes ([D3.6](#)) at paragraph 50 and paragraphs 5.9 -5.18 of Norwich City Council's advice note ([C1.12](#)).

58. Regarding bullet point 2 (*“be of a scale large enough to provide for high standards of student welfare”*): In recent years the council has received proposals for PBSA for a range of sizes. There are a number of factors considered relevant to the appropriate scale for provision of new purpose-built student accommodation including the capability of providing high standards of student welfare, such as including 24-hour staffing on site, adequate infrastructure and on-site amenities, appropriate densities making efficient use of land. Developments below a 200 threshold are considered less likely to be able to viably provide the appropriate level of management and facilities required to ensure a high-quality development. Proposals in excess of 400 bedspaces may have negative impacts on neighbourhoods and existing residential communities. However, this range is not a cap and proposals outside this range may be considered on their merits if they are able to demonstrate the ability to provide for high standards of student welfare. Further detail is set out in Topic Paper for Policy 5: Homes ([D3.6](#)) at paragraph 50 and paragraphs 5.19-5.22 of Norwich City Council's advice note ([C1.12](#)).

59. Regarding bullet point 3 (*“contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities”*): This is considered justified as it is in

accordance with the requirements of paragraphs 92 and 93 of the NPPF which requires planning policies to aim to achieve healthy, inclusive and safe places. As student accommodation is transitory and seasonal, a “dominating existence” can have detrimental impact on community facilities and services.

60. Regarding bullet point 4 (*“provide a mix of accommodation types for a wide range of students”*): This is considered justified as the Planning Practice Guidance (Paragraph: 004 Reference ID: 67-004-20190722 Revision date: 22 07 2019) encourages more dedicated student accommodation to provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock. In recent years student accommodation developments, rather than delivering low-cost accommodation, development has largely been targeted at the high-cost luxury market. This potentially upwardly affects rental rates in all areas of student accommodation delivered through the private sector. This requirement is considered likely to be effective as evidence highlights the importance of ensuring that there is an appropriate mixture of tenures and rental arrangements to suit a variety of student’s financial situations. Care must be taken not to saturate the market with high-end high-cost provision. Further detail is set out in paragraphs 5.42 to 5.46 of Norwich City Council’s advice note ([C1.12](#)).
61. Regarding bullet point 5 *make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents*: This has been addressed in detail in response to Matter 6, Issue 1, Question 6 above.
62. The policy requirements are expected to be effective as they have been in use by Norwich City Council for a period of time and were drafted in collaboration with Higher Education establishments in the city.

Question 3

What is the status of the UEA Development Framework?

Response to question 3 -

63. The 2019 UEA Development Framework Strategy ([B25.1](#)) (2019 DFS) is in draft form. It has been used as part of the evidence base informing preparation of the emerging GNLP rather than replacing the existing framework strategy document.
64. The 2019 DFS was presented to the Norwich City Council Sustainable Development Panel on 17th July 2019. The Sustainable Development Panel members were asked to *“note the emerging Development Framework Strategy for the University of East Anglia (2019) to form part of the evidence base”*.
65. Norwich City Council intend to finalise the 2019 framework to replace the 2010 UEA Development Framework Strategy (2010 DFS) after GNLP adoption.

66. The 2010 DFS, which has been endorsed by Norwich City Council, is therefore still current. It has been relatively successful in promoting growth. The upper predicted levels of growth are being met sooner than expected in the 20-30 year vision set by the document, hence part of the need for the refresh. The 2010 document therefore has more weight in decision making.

Issue 5: Self/Custom Build housing

Question 1

Is the requirement for at least 5% of plots on sites of 40 dwellings or more to be self/custom build housing justified by the evidence and consistent with national policy? Has this requirement been subject to viability testing?

Response to question 1 -

67. The self/custom-build policy is justified, as explained in paragraph 283 of the GNLP Strategy ([A1](#)). A fuller explanation, including reference to the evidence base for this policy approach, is given in paragraphs 55-58 of the Homes Topic Paper ([D3.6](#)). As well as supporting a traditionally under-represented sector of the housebuilding industry, paragraph 58 of the Homes Topic Paper explains that if 5% of completions come forward as self/custom build, this equates to approximately 100 dwellings per year. This is in line with the number of applicants on the local authority self/custom build registers.
68. Viability testing has not been completed for self/custom-build on sites of 40 or more homes. However, viability consultants working on the GNLP's behalf are currently doing this work and the results will be ready at the end of January, in advance of the hearing sessions beginning. Whilst the work is still to be completed, the consultant's initial view is that development viability will be unaffected or even slightly improved, because self/custom-build plots generally attract a premium.

Question 2

Is there evidence to indicate that this level of provision will be delivered?

Response to question 2 -

69. The requirement to require self/custom-build plots on proposals of more than 40 homes is new and it is too early to judge how the house-building industry locally will react in the longer-term. Whilst the policy requirement is for 5% of homes on sites of 40 plus homes to be self/custom build, national evidence set out in paragraph 58 of the Homes Topic Paper ([D3.6](#)) is that the upper limit of the self/custom-build market is 10% of completions across the country. There are also local indications of a positive response from the house-building industry, with examples starting to come through the

system. An example is Land East Of Beccles Road, Loddon (ref: [2021/2437](#)) for 171 homes and 9 self-build dwellings. Other sites, such as GNLP2136 in Harleston and GNLP0337R in Taverham, include pre-application discussions about providing self/custom-build. Therefore, the emerging evidence is that self/custom-build plots will be delivered, subject to localised demand when marketed. This is accounted for in the policy.