

Written statement on behalf of Labour current and ex councillors, on the matter of “the extent to which the proposed development is consistent with the Government’s policies for delivering a sufficient supply of homes”

As the Government’s policies on delivering a sufficient supply of homes has chronically failed over the last ten years under the relevant policies of the National Planning Policy Framework (NPPF) (July 2018), this area of debate needs to be broadened in relation to Norwich and specifically to policies that cover local Planning applications, in particular JCS4 that covers housing delivery in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) (adopted March 2011, amended Jan 2014), and DM1, DM2, DM3, DM12, DM13, DM32 and DM33 that are in the Norwich Development Management Policies local Plan(DM Plan)(adopted Dec 2014). However, in a broader remit these concerns are covered in section 5 of the NPPF (delivering a sufficient supply of homes), and section 12 (achieving well designed places)

Norwich has a long and proud history of supplying Council homes, affordable housing through Associations, and mixed communities through private developments. However, recent Council and Association developments have only contributed a small fraction towards the urgent need for decent, affordable housing, which is one of the biggest problems facing the City. Over the last five years private developments have on a depressing regularity been granted planning permission while being in breach of local Policies covered in the JCS and DM Plan in regard to affordable housing provision. In the vast majority of these applications the reason given by officers to ignore local policy is that the viability of the project would be undermined by meeting policy requirement, and of the “economic benefits” of the scheme overall. Recently an application granted along these lines to the site at St.Mary’s Works (mentioned in the Anglia Sq Planning Application), was withdrawn by the developer with no clear explanation. While on paper the Anglia Sq application meets an impressive quota of Norwich’s housing supply needs (2.6 years supply spread over an 8 year construction period), there are clear concerns about this supply in regards to breaching local policy and the NPPF, in terms of quality and mix of dwellings in terms of size, type and tenure, and of the underlining viability of the whole scheme. I believe all of these concerns should be examined at the Inquiry.

Areas to be looked at in further detail at the Inquiry

- . Core objective of the NPPF which emphasises the importance of delivering a wide range of “high quality” homes and creating sustainable, inclusive and mixed communities.
- . Local policy context for housing provision as covered by JCS4 and DM12 that apply to all residential developments, including the need to contribute to a diverse mix of uses, to have regard to the housing delivery targets, and to provide for a mix of dwellings in terms of size, type and tenure. Also local policy context that relates to affordable housing provision from all private developments.
- . In relation to the above, with the exception of nine houses on the Edward St site, the scheme is entirely flatted with 637 x 1 bed and 563 x 2 bed. As stated in the report “given the scale of proposed housing this represents a narrow mix of dwelling size and type”, and “ this mix is likely to limit the number and size of families who could be satisfactorily accommodated on the site”. This mix clearly does not meet the Housing Needs Assessment and can be argued against in terms of section 5 and 12 of the NPPF.

. There are fundamental concerns over the affordable housing provision in this application, as required under JCS4, which has the target of 33% with 85% social rent and 15% intermediate tenure. The absolute importance of affordable housing to residents of Norwich (and beyond) should be clearly addressed under section 5 of the NPPF. That the 120 affordable dwellings proposed in this scheme (less than 10%) are only achievable, according to the developers' viability report, through public subsidy via HIF and CIL relief is extremely concerning. I am sure the viability report will be covered in other areas of the Inquiry, however I do feel it needs to be discussed in relation to the sufficient supply of homes.

. As stated in the application, the Strategic Housing Officer has confirmed that based on the projected future residential values provided by the developer, Affordable Home Ownership, Shared Ownership and Shared Equity products would not meet the housing need in this part of the city.

. The quality of the proposed homes are a real concern, as highlighted by Design South East in their 2017 report "the quality of accommodation provided is also a concern, with such limited access to daylight and natural ventilation". In the Building for Life report in answer to question 8 (ease of access and how you move through the building) it says ".....the corridors within the building that mostly lack external windows could feel disorientating and convoluted, especially for those people that live at the end of those corridors. The arrival experience will undermine the applicant's declared intention of creating a "living above the shop" rather than "living above the shopping centre" feeling. " While I realise I am drifting into design concerns here, I feel the negative aspects of the proposed homes should be examined under the supply of homes context. There is absolutely no point examining the possible supply of homes if policies laid out in the NPPF, JCS and the DM Plan are not looked at in conjunction with the supply.

There are numerous further areas of concern with this application that I feel should be covered at the Inquiry when it comes to discussing the delivery of a sufficient supply of homes, but I hope this initial written statement lays the groundwork for our participation in the round table discussions.

Kind regards

Hugo Malik