



Town and Country Planning Act 1990 - Section 77
Town and Country Planning (Inquiries Procedure) (England) Rules
2000

Planning Rebuttal Proof of Evidence

Site:	Anglia Square including land and buildings to the north and west
Applicant:	Weston Holmes PLC and Columbia Threadneedle Investments
Local Planning Authority:	Norwich City Council
Name of witness:	David Parkin (MRTPI)
PINS reference:	APP/G2625/V/19/3225505
LPA reference:	18/00330/F
Inquiry reference:	NCC1/4

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1 INTRODUCTION

1.1 I am David Parkin, Area Development Manager for Norwich City Council. I manage the inner area team and oversee all major applications within Norwich city centre. I have prepared this rebuttal proof in response to points raised in evidence by Dr Andrew Boswell in his proof for Norwich Green Party and by Mr Alec Forshaw in his proof for SAVE Britain's Heritage.

1.2 There are two points I wish to respond to:-

- Meeting affordable housing needs raised by Dr Boswell; and
- The planning balance raised by Mr Forshaw.

1.3 I would also like to take the opportunity to up-date the Inspector on progress in relation to the Greater Norwich Local Plan.

2 AFFORDABLE HOUSING NEED

2.1 At paragraph 15 of his proof (NGP1/1) Dr Boswell states that the committee report 'seriously misled' councillors. I disagree with this assertion and set out my reasons below with reference to the conclusions in Dr Boswell's proof.

Conclusion 1: More recent research, especially from the SHMA, shows that the overall need for affordable housing in Norwich is significantly higher than the JCS policy suggests.

2.2 At paragraph 17 Dr Boswell's proof states that the need for affordable housing in Norwich is 38.3% of the total need for dwellings, based on the 2017 SHMA (CD 2.21). This is correct, but it ignores the wider context for the housing market in Norwich and the surrounding area. I've attached as an appendix to this rebuttal proof a response to Dr Boswell's criticisms prepared by Mr Andrew Turnbull, the Council's Interim Housing Development Manager.

- 2.3 In his response Mr Turnbull describes the interaction between the City Council and Broadland and South Norfolk District Councils when it comes to identifying housing need (including affordable housing). This collaborative approach recognises that the housing market is broader than the local council boundaries and reflects the approach in the development plan as it considers the Greater Norwich area. When this approach is adopted, it reveals that the requirement for affordable housing across the Greater Norwich area is 27.93% of the total need for housing. The percentage is derived from the bottom line of Figure 3 in Dr Boswell's proof, which is Figure 83 from the SHMA. In the light of this Mr Turnbull believes that applying the 33% figure from JCS4 to development within the city remains a robust choice.
- 2.4 It is my opinion that this is a reasonable approach and that the 33% figure should be the starting point for looking at affordable housing on sites in the city. Whilst Dr Boswell is technically correct when he concludes at paragraph 17 of his proof that the affordable housing need generated by the city is 38.3%, he is wrong, for the reasons set out above, to conclude that this figure should be applied to the development that is this subject of this inquiry or indeed to any other development in the city.

Conclusion 2: There is a significant need for 2-bed affordable homes, which should be provided as flats in the development. Both the NR3 housing queue data and the SHMA point to a need of over 25% of affordable homes being 2-bed in the area.

- 2.5 Dr Boswell then proceeds to break down the need for affordable housing within the city by type of dwelling. He does this by drawing on figures from the SHMA and from the Choice-based Lettings (Home Options) register for the NR3 postcode. Please note that I believe there is an error in the heading to column D in Tables 3 and 4 of the proof; I believe that it should be entitled 'Affordable Housing Split by SHMA' or something similar.
- 2.6 The housing queue data set used by Dr Boswell is for May 2019; in the appendix to this rebuttal Mr Turnbull up-dates this data to December 2019. The two key figures from the table at paragraph 13 of the appendix are that the figures on the list show that 55.6% of applicants require a 1-bedroom home and 25.8% require a 2-bedroom home.

2.7 Dr Boswell then concludes that this means that there is a significant need for 2-bed affordable units, which should be provided as flats in the Anglia Square re-development. In the appendix to this rebuttal, Mr Turnbull describes at paragraphs 14 to 19 how he and his colleagues determined what the mix of affordable units should be, given the mix of units proposed within the scheme. The points that I draw from this are made at paragraph 18 of the appendix where Mr Turnbull states that the demand for 2-bed flats is very low and that there is an over-supply of this type of property (para 17).

2.8 Given the points made in the preceding paragraph, I agree with Mr Turnbull's conclusion that the mix of affordable units in the development should meet the highest identified need and that this is for 1-bed flats. Mr Turnbull's position that providing 2-bed flats as part of the mix would 'represent a wasted opportunity' is reasonable and Dr Boswell's conclusion at paragraph 25 of his proof is not.

Conclusion 3: 10% is the minimum affordable housing level required by the NPPF and very poor compared to the JCS 33% policy requirement. The emerging SHMA data shows Norwich affordable need is over 38% showing the development's overall housing to be extremely poor.

2.9 Dr Boswell refers to a 10% minimum affordable housing level required by the NPPF. This statement is incorrect and I believe results from a misinterpretation of NPPF para. 64 (CD 1.1), which states that "where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership".

2.10 The NPPF does not set a minimum requirement for affordable housing, it requires Local Planning Authorities to establish the need for affordable housing through the development plan (paras. 59 to 66). The reference to 10% in para. 64 is to a specific affordable housing product in relation to sites where affordable housing is being provided. The Council's position on this product is set out in paragraphs 214 to 216 of the committee report (CD 2.15 and 9.1) so I shall not go through it again here; but in short housing of this type would not meet local housing need.

2.11 Moving on to the point about performance against JCS4, the wording of the policy is quite clear that 33% is a target and can be modified by an assessment of the viability of the proposed development. The Council's case on viability is set out at paragraphs 142-159 of the Committee Report. In addition, Mr Williams has reviewed the up-dated viability information provided by Mr Truss (proof ref) and Mr Williams' conclusions are set out in his proof of evidence (proof ref). I shall not go into these here.

2.12 As I have stated above, it is my opinion that the target level of 33% affordable housing in JCS4 should form the starting point for assessing the level of affordable housing to be provided on the Anglia Square site.

Conclusion 4: When compared to the specific needs for 1-bed and 2-bed affordable homes in the emerging SHMA data of 66% and 51% respectively, the development's overall affordable housing is (even more) extremely poor.

2.13 My response to this conclusion is the same as my response to Dr Boswell's conclusion 3, namely that 33% remains the appropriate target level for affordable housing and that this can be modified by viability information in line with JCS4.

Conclusion 5: The developer benefits from a hidden planning obligation subsidy as the need for 2-bed affordable homes have been ignored and written off. This results from the conflation, by both the council and the developer, that providing 1-bed flats alone meets the needs for affordable housing.

Conclusion 6: When the omission of providing any 2-bed affordable housing is considered the development does not meet even "10% affordable Housing".

2.14 Dr Boswell asserts that the developer's proposals do not even provide 10% affordable housing. This is quite plainly wrong. The requirement in JCS4 is that affordable housing is provided on site and the 33% target is expressed as a percentage of the total units provided on site. By simple maths, providing 120 units as affordable housing is 10% of a scheme providing a total of 1209 units.

2.15 There is a need for 2-bed accommodation, but as Mr Turnbull describes in Appendix 1, this is mainly for 2-bed houses. The primary need for affordable units is 1-bed flats, and this scheme will provide 111 of these. In addition, it will provide nine 3-bed houses. Dr Boswell's emphasis on 2-bed flats ignores this fact. I do not accept either his conclusion 5 or conclusion 6.

Conclusion 7: The phasing in the application acts to jam up the housing queue in the NR3 area of the city for at least 5 years.

2.16 This conclusion is based on the delivery of affordable units and the phasing of this delivery. Dr Boswell asserts that no affordable units will be provided until Phase 2 (Blocks C, D, E and F), which is correct but he then goes on to state that these won't be delivered until 2024. The number of units in each phase, the associated affordable units and the original construction timetable are set out in the table at paragraph 24 of the committee report (page 9, CD 2.1). This shows that Phase 2 will be completed 6 years after the start of the project. However, given that Phase 2 consists of three distinct parcels (Block C, Block D, and Blocks E/F) and that the affordable housing is to be provided in Block D, there is no reason why at least part of this element should not be delivered before the completion of the whole phase. It is proposed to include clauses in the Section 106 agreement to ensure that no more than 200 units in Block A can be occupied until Block D has been completed and transferred to a Registered Provider.

2.17 The phasing of the scheme has no bearing on the fact that, once complete, it will deliver 10% of the total number of units as affordable units.

2.18 There is no evidence to support assertion that the development will 'jam up' the housing queue in NR3, by which I assume Dr Boswell is implying that no other development will come forward in NR3 to deliver affordable housing if the Anglia Square development goes ahead. I do not, therefore, accept Dr Boswell's conclusion 7.

Conclusion 8: Planning councillors were led to believe that the development would make a sizeable contribution to meeting the need for 1- and 2-bed properties. However, this is only true for market properties, where it would deliver 49.3% of objectively assessed need to 2036. The development makes an abysmally small 3.4% contribution to meeting the objectively assessed need for affordable 1- and 2-bed properties in the same period.

2.19 At paragraph 34 of his evidence Dr Boswell makes 5 points regarding paragraph 204 of the committee report; I deal with each one in turn below.

- i. The figure of 15,294 is a typographical error and should read 15,204.

I accept this point. This also should refer to the total need for housing rather than market housing to reflect Figure 83 from the SHMA.

- ii. The reference to 1- and 2-bed properties equates to flats.

I accept this point.

- iii. The proposal would meet the need for 49% of 1- and 2-bed market flats;

1,089 market flats would meet 19.7% of the total need (5511) for 1- and 2-bed flats; adding in the affordable units (111) would meet 21.7% of the total need for this type of unit.

Disaggregating this still further, the need for 1- and 2-bed market flats is 2,208 from the SHMA. The development would meet 49.3% of this need. The need for affordable units of this type is 3,302; the development meets 3.4% of this need or for 1 bed flats alone 5.3%.

- iv. The scheme meets 20% of the total need for 1-bed flats in the SHMA, not 20% of the market need for 1- and 2-bed properties.

The scheme would meet 21.7% of the total need for 1- and 2-bed flats in the SHMA.

- v. Information relating to the delivery of affordable housing is omitted from the report.

Paragraph 204 does not make any reference to how the development meets affordable housing need.

2.20 Whilst the phrasing in paragraph 204 of the committee report is confusing and market and total numbers of housing have been interchanged, the overall conclusion that the development would make a sizeable contribution towards the need for 1- and 2-bed flats is still valid.

Conclusion 9: The proposed development creates a significant structural imbalance between affordable and market housing in Norwich during the next two decades of the emerging GNLP to 2036.

2.21 I do not accept the development will create an imbalance and in any event as much affordable housing as can be viably provided is being provided. In any case, this is a broader policy issue for the Greater Norwich Local Plan. The starting point for assessing this proposal remains the current development plan and the 33% target in JCS4 that may be modified to reflect the viability of individual schemes. It is my opinion that this point it is not a matter that should be resolved at this inquiry but at the examination of the GNLP.

3 THE PLANNING BALANCE

3.1 In this section I address points made by Mr Forshaw for SAVE Britain's Heritage in paragraphs 91 to 100 of his evidence. In these paragraphs Mr Forshaw provides his assessment of the planning benefits (excluding heritage) of the scheme and gives his opinion on the weight that should be attached to them.

3.2 Mr Forshaw deals first with housing and he concludes that the Council has attached too much weight to the level of housing provided. The Council's position is set out in paragraphs 182 to 223 the committee report and in Section 9 of my evidence (NCC1-1). The table at paragraph 19.8 of my main proof of evidence sets out my assessment of the weight that should be attached to the delivery of housing on the site.

- 3.3 In a similar vein to Dr Boswell, Mr Forshaw suggests that the scale of the development at Anglia Square will swamp the market and prevent other sites from coming forward. There is no evidence that this will be the case; a view which is support by Mr Turnbull in Appendix 1 to this rebuttal.
- 3.4 Mr Forshaw is wrong in his interpretation of part of the committee report: at paragraph 94 he states that the committee report raises concerns about the affordability of the affordable units at paragraph 217. This is incorrect: paragraph 217 discusses the type of affordable housing product that can be provided on site.
- 3.5 Mr Forshaw then moves on to give his opinion on the value of the improved retail, leisure and office accommodation. He makes no specific points about leisure and office accommodation but does voice concerns about whether or not the proposed development will meet residents' day to day shopping needs and quotes paragraph 233 of the committee report. Ways of dealing with these concerns are set out in paragraphs 235-243 of the committee report, and subject to the controls referred to in those paragraphs being put in place, it is my opinion that the proposal will provide for a level of retail provision that is appropriate for a Large District Centre whilst not competing with Norwich city centre.
- 3.6 Finally, Mr Forshaw addresses the public realm. His point here is the scale of the development surrounding the two squares created by the development and specifically the western square referred to as St George's Square. This point is covered explicitly at paragraph 451 of the committee report and the report acknowledges that St George's Square will experience substantial over-shadowing at certain times of the year. In mitigation, the report states that the square is proposed to support the extended leisure function of the centre into the evening. The evening function of the square would not be compromised by the scale of the adjacent buildings. In my opinion, this a reasonable position to take.
- 3.7 There are a couple of other points that I need to address in Mr Forshaw's evidence beyond his assessment of the planning benefits. First of all, at paragraph 128 He states that 'no financial analysis is available' of the Ash Sakula scheme promoted by Historic England. This is incorrect; in HE's Statement of Case they state that it 'would not be currently viable' (CD 11.3, para, 6.46); Mr Neale confirms this at paragraph 10.13 of his evidence (HE1-1).

3.8 Secondly, at paragraph 132 Mr Forshaw states that a ‘comprehensive scheme is intrinsically wrong’ for this site. I find this view perplexing and struggle to see how else this site and the buildings on it could be developed. To develop surface level parking first would remove parking without replacing it with the effect of removing shoppers parking and income for the shopping centre owners which supports its viable operation. Furthermore, it would constrain demolition of the Anglia Square precinct complex. As to the conversion of existing buildings including Sovereign House, there is no evidence to suggest this would be viable. Given the nature of the building and its condition it is unlikely to be viable for its current lawful use or for residential conversion. If it was, then it is likely that the owners could have exercised permitted development rights years ago and converted it to residential without any need to provide affordable housing.

4 PROGRESS ON THE GREATER NORWICH LOCAL PLAN

4.1 The timetable for the production of the Greater Norwich Local Plan has recently been updated (see table below).

Stage	Dates
Call for Sites	May to July 2016
Regulation 18 Preparation Stage	
Growth Options and Small Sites Consultation	January to March 2018
New, Revised and Small Sites Consultation	October – December 2018
Regulation 18 Draft Plan Consultation	29 January – 16 March 2020
Regulation 19 Publication Stage	
Pre-submission Draft Plan for representation on soundness and legal compliance	January – February 2021
Regulation 22 - 26 Submission , Examination and Adoption	
Submission of GNLP to Secretary of State	June 2021
Public Examination	Nov/Dec 2021
Adoption	August/September 2022

4.2 The draft plan is now in the public domain prior to Regulation 18 Draft Plan Consultation stage scheduled to commence on 29 January 2020.

4.3 The draft Greater Norwich Local Plan (GNLP) is made up of two documents: the GNLP Strategy document and the GNLP Sites document. The following emerging policies are considered relevant to the proposed development at Anglia Square. However, given the stage reached in the planning making process and the likelihood of representation to the plan (in particular Policy GNLP0506) it will be appropriate to apply only very limited weight to them.

GNLP Strategic document		
Policy 1	The Growth Strategy	Outlines the broad strategic approach to growth and housing
Policy 2	Sustainable Communities	Details 10 strategic issues which all development must be designed to address to be sustainable
Policy 3	Environment Protection and Enhancement	Addresses the requirements for conserving and enhancing our natural and built environment and heritage
Policy 5	Homes	Provides detail on how new homes must address different housing needs including affordable homes, homes for older people, and student accommodation.
Policy 6	The Economy (including retail) –	Sets out details of the main strategic employment areas, the key business sectors, and additional jobs needed up to 2038.
Policy 7.1	Strategy for the areas of growth Policy 7.1 Norwich urban area including the fringe parishes	This section specifies where new housing growth will be distributed, and any specific policies linked to the location.
GNLP Sites document		
Policy GNLP0506	Land at and adjoining Anglia Square, Norwich	Residential-led, mixed-use development as the focus for an enhanced and improved large district centre and to act as a catalyst for wider investment and redevelopment within the Northern City Centre strategic regeneration area as defined in policy 7.1 of this plan. The site will deliver in the region of 1200

		homes to provide affordable housing in accordance with policy 5, subject to viability considerations.
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5 CONCLUSIONS

5.1 Having reviewed the evidence submitted by Rule 6 and interested parties, it remains my opinion that the Council is right to support the development proposals that are the subject of this inquiry.

Statement of Mr Andrew Turnbull, Housing Development Manager

Anglia Square

Application Number: 18/00330/F

Location: Anglia Square Including Land And Buildings To The North And West, Norwich.

Housing development team response to the Norwich Green Party submission relating to affordable housing, viability and consistency with the emerging local plan.

This response relates to the issue of the affordable housing need in the area and the property mix raised by Dr Andrew Boswell on behalf of the Green Party.

Planning Policy

1. The Central Norfolk Strategic Housing Market Assessment 2017 provides the base evidence for housing need to support planning policy in the Greater Norwich Local Plan.
2. In Norwich we have traditionally worked collaboratively with the neighbouring authorities in Broadland District Council (BDC) and South Norfolk District Council (SNDC) and have a joint core strategy (JCS) that provides the main strategic planning policy. We are also working together to produce a new local plan.
3. The JCS policy 4 – Housing lays out the policy for negotiating affordable housing within the three districts. This policy blends the housing needs of the three authorities as it is recognised that the Norwich housing market is broader than just the city council boundaries.
4. This also reflects that the City has a greater identified need for affordable homes for rent that it would not necessarily be able to meet without looking at the surrounding authorities to support delivery whilst BDC and SNDC have a higher identified need for intermediate tenure / low cost home ownership but want to see a mix of tenures on developments.
5. The SHMA 2017 identified that in Norwich there is a housing need for 38.33% affordable housing however, blended across the Greater Norwich area the affordable housing need is 27.93%.
6. It is recognised that there will be a significant number of developments, particularly in the City, that are under the 10 unit threshold for delivery of affordable housing that will deliver no affordable housing. We have therefore continued to apply the 33% threshold as a policy in order to an overall percentage of affordable housing in line with the identified need.

Housing Need and Demand

7. The SHMA 2017, figure 83, identified the housing need for particular types of property by tenure (please note that this table is reproduced from the SHMA and the columns do not sum due to rounding) :

Housing Need	Market	Affordable	Total
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2015-2036		Housing	Housing	
Flat	1 Bed	1,049	2,086	3,135
	2+ Bed	1,159	1,216	2,375
Houses	2 bed	1,128	647	1,775
	3 bed	4,857	1,459	6,316
	4 bed	989	351	1,340
	5+ bed	193	70	263
		9,375	5,829	15,204

8. This table shows a significant need for both 1-bedroom flats and 2+-bedroom flats identified for both market housing and affordable housing.
9. The SHMA was prepared by Opinion Research Services (ORS) utilising their housing mix model. The model utilises historic data of the housing stock in the city and the occupation of that property to determine the need for houses or flats. The model then extrapolates the future housing need based upon this and also trends of changes in demographics.
10. The SHMA 2017 data is the starting point for discussions and negotiations on any development. On any development the housing development officer, in conjunction with planning officers, will seek to influence the types of properties that are put forward for affordable housing to meet the greatest housing need.
11. In order to assist this we will often consult with the council's home options manager to seek data from the current waiting list. This will also show trends for demand on the waiting list as well as housing need as some applicants will be in a low needs band. Applicants on the housing waiting list are banded according to their housing needs. The bands are Emergency, Gold, Silver, Bronze and low housing need.
12. On Anglia Square the senior housing development officer consulted the housing options manager to seek housing need data for the NR3 postcode area. This data shown in the Green Party paper, provided via the planning officer, shows the number of applicants for properties of each bedroom number:

No of Bedrooms	No of Applicants	Percentage of Housing Need
One-bedroom	644	56.6%
Two-bedroom	304	26.7%
Three-Bedroom	97	8.5%
Four-Bedroom	92	8.1%
Total	1137	

13. The SHMA 2017 shows, in the table above, that for the period 2015-2036 there is an affordable housing need for 2086 one-bedroom flats (35.8% of total affordable need) and 1216 two-bedroom + flats (20.9%). The NR3 waiting list data set out at paragraph 12 above shows we currently have 644 applicants (56.6%) for a one-bedroom property and 304 applicants (26.7%) requiring a 2-bedroom property.

The NR3 data does not show the need separated out into flats and houses as applicants are eligible to bid on either property type.

14. Revised figures as of 16 December 2019 for the NR3 waiting list show:

No of Bedrooms	No of Applicants	Percentage of Housing Need
One-bedroom	602	55.6%
Two-bedroom	279	25.8%
Three-Bedroom	105	9.7%
Four+-Bedroom	96	8.9%
Total	1082	

15. When considering the Anglia Square proposals the senior housing development officer was conscious that the viability study had reduced the level of affordable housing down to 10% from the policy requirement of 33%. This resulted in more detailed consideration to ensure that the reduced amount of affordable housing met the highest identified need which in this instance is for one-bedroom flats.
16. The discussions on NR3 housing waiting list data with the housing options manager considered not only the housing need from the number of applicants on the list but also the evidence of demand from bidding for one and two-bedroomed properties.
17. Over the last 12 months the council has advertised and allocated 35 high rise two-bedroom flats at an average of 22 bids per property. Of these bids an average of 3 were from applicants with a priority banding (ie a housing need) the others fell into the low needs banding. Demand from families for above ground floor flats is so low that such properties are advertised to singles as well as families. It is of note that, of the 35 allocations made, 28 were to singles and only 7 to families. In terms of meeting housing need, 20 of the flats were allocated to applicants with no housing need (low band). Each of these clients is under-occupying and subject to bedroom tax if a benefit claimant. Effectively, the figures show that the highest percentage of takers of high rise flats are single applicants with no housing need.
18. By comparison, over the same period, NCC has advertised and allocated 52 two-bedroom houses at an average of 96 bids per property. Every property was allocated to a family with a significant or severe housing need.
19. The figures show that, adding more two bedroom flats to the council's already unbalanced portfolio (which is already heavy with this property type) would not meet demand or need for quality two bedroom family accommodation.
20. Single people, specifically, are more likely to feel the effects of welfare reform, low paid work and zero hours contracts and will continue to struggle to find decent, affordable homes in the city unless the council is able to increase provision. As evidenced by both the SHMA and the NR3 housing waiting list data the greatest need in the City is for one-bedroom homes. The council does not have enough one-bedroom flats to meet the housing need or demand and Anglia Square represents the single most significant opportunity to address this specific need that we are likely to see.

21. In terms of the option to build two-bed flats, the council already has over 4400 of these in stock and there is an over-supply in terms of meeting housing need. As mentioned in paragraph 9 the SHMA uses historic data on property types and occupation as its base.
22. The council has in past years, allowed single people and couples to live in two-bedroom flats, which will account for the high housing need showing for this property type. Welfare reform, particularly the spare room subsidy, has meant that single people and couples are now more likely to be allocated one-bedroom flats which, over time, will shift the future housing need to even more one-bedroom properties.
23. As a result of changing attitudes, families want to live in houses with outside space for their children to play in and tend not to bid on flats. Equally, since welfare reforms, many singles on our waiting list cannot afford the rent on a property with a spare bedroom as their benefits will not meet the costs. As such, demand for two bedroom flats is very low compared to other, high demand property types such as one bedroom flats and two bedroom houses, both of which the council is attempting to increase supply of.
24. This is backed up by the evidence which shows that as well as attracting less bids two-bedroom flats are generally let to people in a lower band of housing need than those successful in bidding for a two-bedroom house.
25. Effectively, using the Anglia Square development to build more two-bedroom flats would represent a wasted opportunity, to the detriment of the numerous households on our register seeking suitable, affordable housing that would meet their needs.

Conclusion

26. The housing development following discussion with the housing options manager supports the affordable housing provision on Anglia Square to be fully comprised of one-bedroom properties to meet the housing needs and demand of applicants to the waiting list.
27. We would not support the provision of two-bedroom properties as they are likely to become harder to let due to the aspirations of people on the waiting list for a two-bedroom house.
28. There are other housing developments within the NR3 postcode area that have planning permission, or are allocated for residential use, and so the Anglia Square development does not prevent them coming forward with provision to meet a need for larger properties.

Andrew Turnbull
Interim Housing Development Manager
13 January 2020