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Greater Norwich Development Partnership
Greater Norwich Projects Team
c/o Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2DH

13th March 2020

Dear Sir/ Madam,

Draft Greater Norwich Local Plan (GNLP) 'Stage C Regulation 18 Draft Strategy and Site Allocations' Consultation.

Watkin Jones Group (WJG) welcomes the opportunity to provide this consultation response to the Greater Norwich Local Plan (GNLP) Regulation 18 Draft Strategy and site allocations consultation.

About WJG

Established in 1791, WJG is a market leading multi-occupancy residential developer with a proven track record in developing and managing residential properties. Since the late 1990s, the Group has increasingly specialised in the development, construction and management of high quality, purpose-built managed student accommodation and more recently Build to Rent (BTR) and Co-Living residential accommodation. The Group works closely with local authorities and other relevant stakeholders to deliver high quality, appropriately designed developments. The Group has an excellent track record for deliverability, with over 95% of its developments 'on site' within six months of the grant of planning permission.

Since 1999, WJG has delivered over 46,000 student beds across 135 sites. Fresh Property Group, part of WJG, operates and manages student accommodation developments on behalf of its clients. Fresh currently manages over 17,000 bed spaces across the UK and Ireland. WJG has a track record of delivery across a number of major cities including Aberdeen, Bath, Belfast, Bristol, Bournemouth, Cardiff, Chester, Edinburgh, Glasgow, Leeds, Leicester, Liverpool, London, Manchester, Norwich, Oxford, Sheffield, St Andrews, and Swansea. A number of WJG schemes have involved the reuse of existing buildings and in March 2019 was awarded Best Altered Building at the Leeds Architecture Awards.

In recent years WJG has diversified their business in the living sphere, making WJG a market leading multioccupancy residential developer who are actively involved in the Build to Rent ("BTR") and Co-Living sectors. WJG has BTR developments in a number of locations, both operational and under construction such as Bournemouth, Reading and Sutton.

WJG is actively exploring additional PBSA opportunities in the Greater Norwich area. The Greater Norwich Local Plan Regulation 18 consultation is therefore of considerable interest to WJG and the opportunity to comment on this

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consultation document is appreciated.

Greater Norwich Local Plan Consultation Objectives

The overarching vision statement of the GNLP states that “by 2038 Greater Norwich will have vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment.” To achieve this, a set of key objectives have been established, to guide and monitor policy. These are summarised below:

Economy- *To stimulate the creation of a strong, enterprising, productive and broad-based economy, and the growth of a wide range of economic sectors, supported by an increasingly skilled workforce.*

Communities- *To promote the growth of mixed, inclusive, resilient and sustainable communities ensuring new communities are safe and attractive places to live.*

Homes- *To deliver homes to meet a variety of housing needs for those living and working in Greater Norwich, including rising ageing population, families and younger people, single occupants and those looking to share a home with others. Types of development reference included flats for younger people and purpose-built student accommodation.*

Infrastructure- *By 2038, the Greater Norwich transport system will have been enhanced through a combination of infrastructure improvements and new technologies.*

Delivery- *To achieve sustainable and inclusive growth through co-ordination with development providers, organisations and agencies.*

Environment- *To achieve reductions in greenhouse gas emissions to contribute to the national zero emission target by 2050.*

WJG support these objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment. WJG has an exemplar reputation for creating living developments that aspire to all the above ambitions of GNLP. WJG views living accommodation in the context of the wider community, where placemaking is key. Whether these be in a heritage sensitive location, within the city centre or the outskirts of the city. WJG seeks to achieve the highest standard of design and meet the challenges of a changing climate and economy.

WJG developments seek to contribute to neighbourhood housing options, and to the liveability, health and wellbeing of the residents that occupy them. This has been achieved by including well-designed public spaces, attractive public realm, car free developments, and where possible, including community infrastructure such as retail and leisure opportunities. These are all the critical components of a truly vibrant and inclusive city.

Affordable Student Accommodation

The draft GNLP provides policy to meet the plan’s key ‘Homes’ objective. This policy wording would benefit from increased flexibility within the affordable housing requirements for purpose-built student accommodation. Policy 5-Homes of the draft GNLP states that all residential development proposals and student accommodation must provide affordable housing on site. In the wider Greater Norwich area, 33% affordable housing provision is required, with a reduction to (at least) 28% for sites within Norwich City Centre.

WJG recognise and support the need to ensure that a proportion of PBSA is provided at multiple price points in the Greater Norwich area if Higher Education Institutions (HEI’s) are to continue to attract students from a range of backgrounds. WJG have direct experience of the impact of affordable student accommodation policy on the overall supply of PBSA especially in locations such as London, where there are similarly prescriptive policies in place. As a consequence of this policy, PBSA delivery in London has significantly contracted in the period since 2017. Bed delivery was c3,500 beds per annum prior to the introduction of the affordable student accommodation policy, but it is understood that c2,000 beds will come to market during 2020; significantly less than the 3,500-target figure. The lack of competition and constrained supply is projected to increase rental growth to the detriment of all students. In turn, this

would impact on student desirability to choose HEI's in the Greater Norwich area which will have wider, negative effects.

Norwich City Council's report 'Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note' (November 2019) sets out guidance and requirements for PBSA in Norwich City Centre focussing on the University of East Anglia and Norwich University of the Arts. It is noted that this document should help to inform emerging policy relating to student accommodation in the GNLP. In reviewing this report, it is noted that affordable student accommodation is a national issue for local authorities and for HEI's alike. The report notes that student accommodation proposals are not required to provide affordable housing, however a commuted sum is encouraged from PBSA developments on sites allocated for residential or residential-led development. This aims to mitigate any loss of affordable housing provision from PBSA developments and allows for off-site provision. The report provides information relating to the ways that opportunities for affordable housing can be lost due to PBSA developments, however there is very limited evidence analysing the need/ benefits of affordable student accommodation within the Greater Norwich area.

WJG would recommend therefore that the Council commission further analysis before introducing a policy requirement which may have a negative impact upon the supply of PBSA within the Greater Norwich area and which may in turn affect the ability to attract talent to the area and cause a detrimental effect to both the Economy and Homes objectives set out in the draft GNLP.

Should the Council conclude there is a justifiable requirement for PBSA developments to incorporate a proportion of affordable accommodation, WJG would request that there are in-built appropriate levels of flexibility, whereby:

- A reduced level of affordable provision is capable of being justified by reference to a development viability assessment; and
- A reduced level of affordable provision may be accepted where developments deliver other significant and substantial regeneration benefits.

WJG would also note that the following will assist with addressing issues of affordability:

- A more permissive approach, whereby an uplift in PBSA delivery can be sustained, will ensure a better balance of demand and supply, which is undoubtedly a key driver of price; and

The policy also states that 10% of the affordable homes should be available for affordable home ownership where this meets local needs. This requirement is not applicable to PBSA. As PBSA is privately rented accommodation, this statement does not apply and is in direct opposition to objectives set out within the NPPF. The NPPF states that student accommodation should be exempt from this requirement. WJG therefore recommend that this section is removed.

Conclusion

We trust that the student accommodation comments within this representation will be considered and incorporated into any future approved GNLP strategy or planning guidance that may follow from it. We would kindly ask that we retain the opportunity to further engage with yourselves moving forward.

Yours faithfully,
FOR THE WATKIN JONES GROUP

Clare Droog
Associate Planning Director