

Response to the Draft Greater Norwich Local Plan – Part 1, The Strategy

Please see the response below, in relation to Section 5.0 of the Representation Form, setting out the modifications required to render the Local Plan sound.

GNLP REGULATION 19 POLICY / PARAGRAPH	RESPONSE
<p>Policy 5 – Homes</p>	<p>The policy’s objective of encouraging the delivery of purpose-built student accommodation (PBSA) to support the growth of the University is, in principle, supported.</p> <p>Away from the UEA campus, the draft policy states that proposals for PBSA will be supported where the need for the development is justified by the current or proposed size of Norwich’s higher education institutions, and the proposals will adhere to a range of criterion.</p> <p>One of these criterion requires off-campus PBSA to make provision for a policy-compliant proportion of affordable housing that would be expected if the site were developed for general needs housing.</p> <p>This element of the policy is considered unsound, as PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64 of the NPPF specifies that, where the provision of housing is proposed, at least 10% of the homes should be made available for affordable home ownership. Paragraph 64(b) of the NPPF states that PBSA is exempt from this 10% requirement.</p> <p>On this basis, to ensure that the policy is justified and consistent with national policy and, therefore, sound, it is recommended that the wording of the policy is revised to recognise that PBSA should not be expected to contribute towards affordable housing provision.</p> <p>To address this, the following sections of Policy 5 should be reworded to read as follows:</p> <p>Affordable Housing</p> <p><i>Major residential development proposals and purpose-built student accommodation will provide:</i></p> <p>Purpose-built Student Accommodation</p> <p><i>Development proposals for purpose-built student accommodation will be supported at the UEA campus where they are in accordance with the UEA Development Framework Strategy (DFS).</i></p>

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	<p data-bbox="608 327 1458 461"><i>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:</i></p> <ul data-bbox="608 495 1458 846" style="list-style-type: none"> <li data-bbox="608 495 1458 562">• <i>be in a location otherwise suitable for residential development with sustainable access to the institutions served;</i> <li data-bbox="608 589 1458 656">• <i>be of a scale large enough to provide for high standards of student welfare;</i> <li data-bbox="608 683 1458 750">• <i>contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities;</i> <li data-bbox="608 777 1458 846">• <i>provide a mix of accommodation types for a wide range of students;</i> <p data-bbox="608 819 655 846"><i>and</i></p> <p data-bbox="608 880 1458 1014">• 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.</p> <p data-bbox="608 1048 1458 1115"><i>All consents will be restricted so the use of the accommodation is secured for students only.</i></p> <p data-bbox="608 1149 1458 1216">Paragraph 281 of the Strategy Document should also be amended to read as follows:</p> <p data-bbox="608 1249 1458 1664"><i>281. 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 Strategy. 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.</i></p> <p data-bbox="608 1697 1458 1765">Without these suggested changes, the policy and supporting text is neither considered to be justified or effective and, therefore, is not sound.</p>