

8th January 2025

Sarah Everard
Area Planning Manager
The Horizon Centre,
Peachman Way,
Broadland Business Park,
Norwich
NR7 0WF

Dear Sarah,

Response to consultation on planning applications 2024/3500, 2024/3501, 2024/3510 and 2024/3511

Thank you for consulting Hellesdon Parish Council on the aforementioned planning applications. The Parish Council held a meeting on 6th January 2025, specifically to discuss these applications. During this meeting, concerns were raised over the following:

Affordable Housing

The proposal is now to restrict the number of affordable houses to those already built in Phases 1 and 2.

Hellesdon Parish Council commissioned AECOM to create a Housing Needs Assessment (HNA) specifically for the parish, which was adopted in June 2024. This should therefore be given significant weight due to the contemporary nature of the report. A copy of this report is enclosed, but of significance is the following findings:

Para 4.1 - Tenure

The tenure of properties in private ownership in Hellesdon is much higher than those of the District and of England:

	Hellesdon	Broadland	England
Private ownership	82.4%	77%	61.3%
Shared ownership	0.4%	0.9%	1%
Private rent	9.8%	12.3%	20.6%
Social rent	7.4%	9.7%	17.1%

Para 1.7 – Affordability

Even average earning households fall below the affordability threshold required to afford an average home through market ownership. The median house price would require an annual income slightly over double the current average.

Para 1.8

The unaffordability of average market ownership for average earning households is driven by strong house price appreciation in the Parish over the past ten years, with the median house price growing by 56% between 2014 and 2023. It is noteworthy that the LQ Neighbourhood Area house price is above that of the LA's prices in 2023, which may suggest the Neighbourhood Area is a particularly high-value area within Broadland for entry level houses.

Para 1.10

An offering of Affordable Housing tenures would be beneficial in Hellesdon to widen access to those with varying home ownership/renting aspirations: ...

... The evidence in this chapter suggests that the affordable rented sector performs a vital function in Hellesdon as the only option for a large segment of those in the greatest need.

The 2024 Housing Needs Assessment for Hellesdon supports the Housing Enabling Officer's consultation comments of 23rd December by evidencing the need for affordable housing in Hellesdon and of the varying types.

Recreational Open Space

Concerns were also raised in the meeting about the quantity of recreational open space provision. In accordance with the Recreation Provision in Residential Development SPD, 2.02ha per 1,000 population standard should be provided. This was already negotiated to a lower provision under application 2015/1770, but now the applicant proposes to reduce the allocation further to 1.043ha for the whole development. Furthermore, this has been proposed as a completely unsuitable layout with no consultation with the local community as to the needs of Hellesdon. It also fails to take into account the amenity of those who will reside in the neighbouring dwellings (in particular plots 375, 366, 363, 362, 361 and 360).

Hellesdon Parish Council commissioned Ploszajski Lynch Consulting Ltd in 2020 to create a Sports and Open Space Needs Assessment specifically for the parish. Utilising the standards in the Greater Norwich Development Partnership's '*The Greater Norwich Green Infrastructure and Recreational Open Space Topic Paper (2011)*', Hellesdon should have 37.23ha of publicly accessible green space of all types, whereas it actually has 17.15ha which is less than 50%. Whilst we do not expect developers to resolve the existing problem of lack open space in Hellesdon, we do expect developers not to exacerbate the issue by not complying with planning policy over provision of open space.

The assessment projects the parish population to grow by 3,000 people by 2036 – the majority of this population increase will be a result of Persimmon's development of the golf course. This population growth will require an additional need of 9.96ha in open space. The assessment also identifies that Hellesdon is so heavily built up that there are very limited

opportunities to adding new green space in areas that are currently deficient, therefore exacerbating the deficiencies in open space in Hellesdon will be terminal with no opportunity for the Parish Council to remediate this in the future. A copy of this report is attached.

Developer Obligations vs Viability

Concerns were raised in the meeting about the applicant proposing to renege on their obligations as a result of financial viability. Having reviewed the applicant's Financial Viability Assessment there are inconsistencies which require clarification.

- 1) The Viability Assessment refers to 772 dwellings, whereas the Design and Access Statement refers to 787 dwellings. We have been advised that this inconsistency is as a result of changes to the Phase 3 planning application (which has yet to be consulted upon) which will likely result in the Viability Assessment needing to be changed. How can there be a consultation on plans based upon viability, when the Viability Assessment is not accurate?
- 2) There appears to be some detail missing from the Viability Assessment. Para 4.36 advises that the detail of the Sensitivity Tests undertaken are detailed in Appendix 12. Sensitivity 1 (no affordable housing) has been published, but Sensitivity 2 (sales value and build costs) has not.
- 3) There are inconsistencies as to what the applicant feels that their benchmark profit from this development should be. Para 4.26 specifies that benchmark levels of developer's return of 17.15% on GDV, however para 4.32 suggests it should be 19.21% on GDV

The applicant advises that they wish to reduce 'non-essential s106 costs to further improve the viability of the scheme' (para 4.32 of the applicant's Financial Viability Assessment).

What the applicant classes as 'non essential s106 costs' are the opportunities for those who earn an average salary to reside in Hellesdon. They are the quality and quantity of open space that the people of Hellesdon are entitled to. They are the amenity of those who will reside in this development. The 'non-essential s106 costs' are the difference between a development and a community.

Community Engagement

The Parish Council agreed to object to the application on the grounds of lack of engagement with the local community. Section 137 of the NPPF (December 2024) states that 'Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.' We would like to advise that Local Planning Authority that there has been no engagement whatsoever by the applicant with the Parish Council. This is fundamental to establish the requirements of the local community to mitigate the effects of development, especially the requirements for formal and informal open space and the community building. Whilst we appreciate that this engagement is not required by law, we would like to enquire as to whether the Local Planning Authority encouraged the applicant to engage with the local community prior to submitting their applications, as detailed in Section 41 of the NPPF?

The Parish Council has been, and remains, open to discussions with the applicant over their s106 obligations.

Should you wish to discuss any aspect of this response in more detail, please do not hesitate to contact me.

Yours sincerely,

Faye LeBon

Faye LeBon
Clerk to Hellesdon Parish Council