

Greater Norwich Development Partnership Board – 24 June 2021

Questions from the Public and Responses

Four questions have been asked. The questions and responses are below and will be included in the meeting's minutes.

Bryan Robinson

My various queries on the housing numbers in the Reg. 19 representations were not answered and therefore I wish to submit the following question.

The Household Projections between 2018 and 2038 as set by the Government in the Table 406 for the 3 districts of Greater Norwich is 29,954. This figure is adjusted by a separate local affordability adjustment for each district to give the Housing Need. This establishes the base figure of 40,541 for Greater Norwich for 2018 to 2038. The Reg. 19 proposes further contingencies, buffers and windfalls to set a delivery target of 52,646 homes over this period which is 76% above the Household Projections. The reason given is to ensure sufficient homes are available to ensure growth targets. The Council Response to Main Issues states "*if the anticipated economic growth is not delivered the homes above the housing need will not be delivered as there will not be a market for them*" for which the 76% overall contingency above the Household Projections seems excessive. Also the ratio of new jobs : homes since 2008/09 as the AMR figures is 1 : 1.08 but that set out in Reg. 19 is 1 : 1.5 meaning that there will there is an overprovision based on historic evidence. Based on the previous ratio 35,640 homes would be required for the 33,00 jobs over the 20 year period.

If it is acknowledged that market forces will prevail and past performance ratio of jobs and homes suggest a lower number of homes is sufficient to meet the anticipated economic growth (jobs), what is the justification for this overprovision of homes?

Officer response

The Government's standard methodology provides the base position and identifies a need for 40,541 homes in the plan period. Typically, some sites take longer to develop than envisaged and some planning permissions are not implemented. To ensure that housing needs are met in full and a steady supply of sites is available, the plan identifies at least 10% additional provision. Such provision provides replacement opportunities and choice to ensure delivery of the 40,541 homes needed; it is not necessarily expected to be additional growth. In total, the GNLP identifies opportunities for 49,492 homes. The additional uplift within this total provides greater certainty of delivering need and also ensures that faster economic growth and a larger number of jobs than the trend-based target can be supported. This uplift will also address the possibility of higher levels of household growth as indicated in the Office for National Statistics 2018 projections. Comparing the ratio of jobs to homes for different time periods is not necessarily a useful indicator as it will be affected through time by demographic change, the performance of the local economy and changes to work patterns such as commuting flows and home working.

Dr Catherine Rowett

In Appendix 11a of the papers, the GNDP have responded to each submission on the Norwich Western link (NWL) road that the NWL is solely a Norfolk County Council (NCC) infrastructure scheme. However, the NWL is included in the plan in these places in the Regulation 19 draft plan: section 3 “the vision and objectives for Greater Norwich” at para 138 (“By 2038 our transport system...will include the Norwich Western Link ...”); at para 243 (“Strategic transport improvements in policy 4 include ... the Norwich Western Link”; and under Policy 4 on page 81 (“delivery of the Norwich Western Link road”).

If the NWL is solely an NCC project, will the GNDP remove all the above references to the NWL from the plan? And if not, why not?

Officer response

The Norwich Western Link is not an allocation in the GNLP. The plan recognises the scheme as part of a wide-ranging package of proposed strategic transport improvements provided by a range of bodies with transport responsibilities. These also include trunk road schemes and rail enhancements. It is appropriate to identify such schemes and proposals in the local plan as they affect the strategic context for growth and development.

The NWL would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.

David Pett, Stop the Wensum link campaign

In Appendix 11a of the papers, the GNDP have responded to each submission on the Norwich Western link (NWL) road with the proposition that the NWL is solely a Norfolk County Council infrastructure scheme and that the planning, habitats, environmental, climatic and other impacts of the NWL do not need to be considered in the GNLP making process. As in the SWL submission at the Regulation 19 consultation, the NWL is clearly included in the GNLP whilst pretending not to be. For example, paragraphs 139 and 243 of the Regulation 19 document, without doubt, identify the NWL as a deliverable of Policy 4 of the plan. The Plan is unsound at several levels in including the NWL in this misleading way and attempting to delegate impacts of the NWL, which should be assessed by the GNLP’s sustainable appraisal and environmental assessments, to other governance and planning realms.

Will the GNDP chair share with the GNDP Board, the legal advice which GNDP has taken on the above, so that members are fully aware of the legal risks involved before agreeing at recommendation 1 “that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination”?

Officer response

As in the answer to Dr Catherine Rowett above.

It is not considered that the references to the Norwich Western Link in the GNLP raise any legal risks to the plan.

Dr Andrew Boswell, Climate Emergency Planning and Policy (CEPP)

In September 2019, climate lawyers ClientEarth, who litigate in the UK and around the world, wrote to the Greater Norwich planning authorities about the need to integrate carbon emissions reduction objectives throughout the GNLP local plan policies. This was followed by ClientEarth consultation responses at Regulation 18C (March 2020) and Regulation 19 (22nd March 2021): the Regulation 19 response noted “none of the issues raised in our response to the Regulation 18 consultation appears to have been addressed”, and found the plan unsound and not legally compliant. In response (Appendix 11a of papers, page 420, GNLP have responded “The GNLP conforms to legislation and national planning policy and guidance, and, subject to the above, has had regard to climate change issues”.

Will the GNLP chair share with the GNLP Board, the legal advice which GNLP has taken on the above, so that members are fully aware of the legal risks involved before agreeing at recommendation 1 “that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination”. ?

Officer response

The objectors have given their opinion that the plan is unsound and not legally compliant. It is for the Planning Inspector to assess whether this is the case. Having reviewed the relevant legislative and policy requirements, we are comfortable that the GNLP has been positively prepared to address climate change within the proper legislative framework and that the plan does what we are legally required to do. This is reflected in our statement on Climate Change in Section 4 of the GNLP. In addition, we are confident that the plan expresses some quite ambitious objectives about how land use can contribute to delivering improvements in our carbon performance.