

SCC Norwich Response to Proposed Main Modifications to emerging part Joint Core Strategy for Broadland, Norwich and South Norfolk.

We have now had the opportunity to review the further submissions to the part Joint Core Strategy (JCS) Examination and respond on behalf of our clients, SCC Norwich. This response relates to the proposed flexibility policy under MM2. We make no further representations in relation to any of the other material provided.

MM2 – Implementation within the Broadland part of the NPA

We support the Councils' proposal to include a Policy 21 within the JCS that will allow for continued scrutiny of housing delivery in Broadland and where a shortfall is identified, allow positive action to address this deficit.

However, the proposed policy as currently worded is not considered positively prepared or effective for the following reasons:

- it delays consideration of alternative sites until a AMR is published 3 full years from the adoption of the plan – this is considered too long given the existing shortfall of housing provision in the area.
- the requirement to consider alternative sites is only triggered where there is likely to be a significant shortfall of deliverable sites by 2026 (my emphasis) – it doesn't therefore seek to address more immediate 5 year land supply shortfalls – should these continue in the next 5 years or so;
- it does not explicitly allow for the consideration of alternative sites in the NEGT area in the first instance, before revisiting the adopted strategy to consider alternative sites in the wider NPA.
- It is wordy and in my view, unnecessarily reiterates the principles of the NPPF.
- It only requires alternative allocations to be identified where work has not already commenced on a local plan to replace the JCS – however it is unclear what level of work on the replacement local plan would need to be commenced - it could be interpreted that even where early stage feasibility work is being undertaken (with no immediate prospect of a draft plan being published) that the requirement to consider alternative allocations is not triggered.

In this context, Policy 21 should be reworded to make it more effective. As stated, whilst acknowledging the potential infrastructure constraints to the delivery of growth in the NEGT, the Policy should also seek (in clear terms) to facilitate development of alternative sites within the NEGT in the first instance, where possible, before considering growth more widely in the Norwich Policy Area. This would be entirely in keeping with the Sustainability Appraisal that seeks to direct growth to the NEGT. The revisiting of this strategy to consider alternative sites in the Norwich Policy Area should only take place, once it has been accepted that no alternative NEGT sites could be delivered in the short term to meet housing need.

We therefore suggest the following wording for Policy 21:

When considering development proposals in their part of the NPA, Broadland DC will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. It will always work proactively with applicants jointly to find solutions, which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

*If, notwithstanding this positive approach to managing development, any annual monitoring report produced after **one** full year from the adoption of this plan demonstrates that there is a significant shortfall (defined below) in the supply of strategic housing development targets across the NPA as set out in this Strategy, then the Councils will take action to address the identified shortfall.*

The Councils will consider that a significant shortfall has arisen if the AMR shows a 10% under supply of deliverable and viable development land in the next 5 years.

If it is demonstrated that there is a significant shortfall in the supply of the strategic housing development targets set out in the JCS, then the Councils will take action to address the identified shortfalls through a focussed Local Plan identifying alternative locations for development in the following sequence:

- *Land within the Broadland part of the NPA;*
- *Land within the wider NPA (in accordance with the settlement hierarchy set out in paragraph 6.2 of the JCS).*

We trust this response will be given due consideration.