
Greater Norwich Local Plan

Local Plan Examination
Hearings Statement relating to:
Matter 2 / Issue 2

On behalf of
Barratt David Wilson Homes (Eastern Counties)



Contents

Matter 2 – Vision, Objectives and The Spatial Strategy

Issue 2 – Housing Growth

Question 1. Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national planning policy and guidance?	1
Question 2. Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?	4
Question 3. Are all of the settlements listed in the correct level within the hierarchy?	5
Question 4. Is the distribution of growth in line with the settlement hierarchy justified by the evidence?	9
Question 6. Is the identification of a supply buffer of 22% against the housing requirement justified?	10
Question 7. Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?	11

Matter 2 – Vision, Objectives and the Spatial Strategy

Issue 2 – Housing Growth

Question 1. Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national planning policy and guidance?

No.

Throughout the Plan, the Councils misunderstand and confuse various terminology regarding ‘housing need’, ‘housing requirement’ and ‘housing supply’.

PPG¹ explains:

“Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”

The correct approach is to:

1. Identify housing need.
2. Establish a housing requirement that will ensure the identified need is met.
3. Identify a supply of sites to meet, at least, the housing requirement.

The reasons for undertaking these steps separately are obvious.

Housing Need

In our representations to the R19 consultation, we noted that the Plan states² that it ‘follows the required approach’ in relation to the identification of ‘housing need’. In their ‘representation summary & response’ document³ the Councils state in response:

“The level of housing need for Greater Norwich is identified by using the government’s standard methodology.”

However, PPG⁴ explains:

*“The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area...there will be circumstances where it is appropriate to consider whether actual **housing need** is higher than the standard method indicates...[these] include...:*

- *growth strategies...;*
- *strategic infrastructure improvements...*”

¹ ID: 2a-001-20190220

² Para. 177

³ Document A8.19, p. 111

⁴ ID: 2a-010-20201216

Two factors are relevant to Greater Norwich – demographic indicators and the economic growth strategy. **Neither of these have been taken into account in determining the ‘housing need’.**

A statement was added to the Plan⁵ in direct response to our representations to the 2018 and 2020 consultations that the Plan included a buffer to allow for under-delivery but made no reference to the desire for growth:

“To ensure the identified need can be met, it is normal practice to identify additional potential supply to buffer against under-delivery, typically around 10%. This plan includes a significantly larger buffer [i.e. within the supply] to provide the potential to accommodate higher growth rates as signalled by ... the 2018-based projections for Greater Norwich which are somewhat higher than the 2014-based projections.”

This again confuses need with supply. It is indeed common practice to include additional housing sites within the supply as a buffer to provide flexibility and for some sites to not come forward as expected. However, this is entirely separate to considering matters of ‘housing need’.

The focus on growth remains clear and evident – under ‘Planning to Our Strengths, the Plan⁶ states:

“Greater Norwich is recognised nationally as a key engine of growth and one of the fastest growing parts of the country.”

whilst the supporting text⁷ to Policy 1 explains that the Plan:

“...aims to make the most of Greater Norwich’s substantial economic growth potential to develop its leading role in the national economy...”

The Plan⁸ goes on to state:

“The Government encourages authorities to consider higher levels of [housing] growth than that required to meet [Standard Method-generated] local housing need, particularly where there is the potential for significant economic growth. Our overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.”

This appears to be a fundamental misunderstanding – the Government does indeed offer such encouragement and support, but does so in relation to ‘housing need’, not ‘housing supply’.

It is surprising that the Plan takes this approach given that PPG⁹ is explicit in that that the consideration of whether actual housing need is higher than the Standard Method indicates:

“...will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).”

⁵ Para. 178

⁶ Para. 10

⁷ Para. 162

⁸ Para. 185

⁹ ID: 2a-010- 20201216

In short, PPG is clear in that the consideration of higher 'housing need' should take place prior to the establishing of a 'housing requirement', all of which should be undertaken prior to identifying the 'housing supply'. The Plan conflates all of these into a single consideration, directly contrary to PPG.

The subsequently-published Policy 1 Growth Strategy Topic Paper¹⁰ states:

"...the higher provision...provides the scope for additional delivery to support economic growth...[and] recognises that the 2018-based ONS projections for Greater Norwich indicate the possibility that household growth may be higher..."

This statement further confirms the Councils' misunderstanding of the process. The Plan fails to consider whether the Standard Method 'housing need' should be increased in response to demographic indicators or the economic growth strategy, and instead simply asserts that the proposed provision provides the 'scope' to support these factors.

In summary, the Plan establishes the Standard Method LHN figure, but fails to undertake any further steps in establishing the actual 'housing need'. As such, the Plan has not been positively prepared, is not justified, will not be effective, and is not consistent with national policy and guidance.

Housing Requirement

The Plan does not include a 'housing requirement'.

PPG¹¹ is clear and explicit:

*"The standard method...identifies a minimum annual housing need figure. **It does not** produce a housing requirement figure."*

Policy 1 refers to 'housing need' of 40,550 homes, and 'provision' (i.e. supply) of 49,942 homes. Neither of these is a properly-prepared or justified 'housing requirement'.

The Plan¹² explains that the Standard Method LHN figure of 40,550 homes:

"...This local housing need is the target against which land supply will be measured..."

and¹³ (Councils' emphasis):

*"...policy 1 provides for around 49,500 new homes. This is the total provision in the plan and is **not** the need or target against which land supply will be measured..."*

This confirms that the Councils intend that the Standard Method LHN figure of 40,550 is proposed to be the 'housing requirement', against which housing delivery and land supply will be assessed.

¹⁰ Document D3.1, para. 112

¹¹ ID 2a-002-20190220

¹² Para. 177

¹³ Para. 179

The proposed use of this figure as the 'housing requirement' is directly contrary to PPG (see above).

Summary

In summary, the Plan does not follow the required approach; it follows the approach expected by PPG as the 'first step' in the process, but fails to undertake any further steps, or properly establish a 'housing requirement'. In doing so, the Plan is directly contrary to Government guidance¹⁴ that the Standard Method LHN figure '**does not**' produce a housing requirement figure.

The approach set out in the Plan to considering the implications of economic growth drivers, as part of housing supply rather than housing need, represents a fundamental misunderstanding of the process of establishing the Local Plan housing requirement. The implications are practical, significant and important. The Plan will be tested in terms of housing delivery and land supply against the 'housing requirement' – if this is to be the Standard Method LHN figure then this represents a substantial weakening of the proposed strategy and increased risk that insufficient housing will be delivered and economic growth undermined.

Question 2. Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?

No.

There is an absence of explanation or justification for the proposed hierarchy.

The SA discusses the topic briefly and refers to the 'Growth Options Document', which formed part of the R18A consultation in 2018. The Growth Options Document¹⁵ states:

"The current levels in the hierarchy set out in the JCS [Joint Core Strategy], are "Norwich Urban Area", "Main Towns", "Key Service Centres" (KSCs), "Service Villages", "Other Villages" and "Smaller Rural Communities and the Countryside"

and:

"KSCs are...Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham."

The top three tiers of the proposed hierarchy are taken directly from the JCS, without any amendment or re-consideration of material changes that have occurred over the decade since the JCS was prepared – for instance the completion and opening of the Norwich Northern Distributor Road, which have fundamentally changed the context of some settlements, such as Horsford, significantly improving access to social and economic infrastructure. Indeed, the only consideration at R18 stage was whether the lower levels of the hierarchy should be combined into 'village clusters'.

In summary, the hierarchy in the Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and as such the Plan has not been positively prepared, is not justified, and will not be effective.

¹⁴ ID: 2a-002- 20190220

¹⁵ Paras. 4.4.3 and 4.4.6

Question 3. Are all of the settlements listed in the correct level within the hierarchy?

No.

Settlement Hierarchy & Horsford

The Plan (Table 1) sets out the largest settlements, by population according to the 2011 census, within the Greater Norwich area:

Settlement	Population
Norwich urban area	213,166
Wymondham	14,405
Diss	7,572
Aylsham	6,016
Hethersett	5,691
Poringland (including Framlingham Earl)	4,826
Harleston	4,641
Long Stratton	4,425
Horsford	4,163
Brundall	4,019
Blofield	3,316
Acle	2,824
Reepham	2,709
Hingham	2,367
Loddon and Chedgrave	2,284
Wroxham	1,502

The Plan then sets out¹⁶ a 'settlement hierarchy':

1. The Norwich urban area
2. The main towns
3. The key service centres
4. Village clusters

Whilst noting that population alone is not necessarily a determiner as to what tier of the hierarchy a settlement should be placed within, when the hierarchy is applied to list of the largest settlements, it is generally that the larger a settlement the higher the tier it falls within:

¹⁶ Para. 191 and Policy 1

Greater Norwich Local Plan Examination

Hearings Statement relating to Matter 2 / Issue 2



Settlement	Population	Hierarchy Tier		
Norwich urban area	213,166	1		
Wymondham	14,405	2		
Diss	7,572	2		
Aylsham	6,016	2		
Hethersett	5,691		3	
Poringland (including Framlingham Earl)	4,826		3	
Harleston	4,641	2		
Long Stratton	4,425	2		
Horsford	4,163			4
Brundall	4,019		3	
Blofield	3,316		3	
Acle	2,824		3	
Reepham	2,709		3	
Hingham	2,367		3	
Loddon and Chedgrave	2,284		3	
Wroxham	1,502		3	

What is not clear is why Horsford – the ninth largest settlement, is the only settlement listed in Table 1 that is not within the top three tiers of the hierarchy.

Horsford has grown substantially over recent years, with the last decade of growth not being reflected in the above figures, and is continuing to grow. Combined, three planning permissions¹⁷ relating to the land adjacent and to the south of our clients' site¹⁸ have permitted a total of 429 new homes, with 235 homes completed by March 2021.

Together these new homes will increase the population of Horsford by approximately 1,000, likely elevating it yet further in the list of largest settlements as indicated below¹⁹, potentially to the sixth most populous settlement:

Continued.../

¹⁷ Refs: 2013/0547, 2016/1770 and 2019/0999

¹⁸ HELAA Ref. GNLP2160

¹⁹ Noting that growth in other areas would also need to be taken into account.

Greater Norwich Local Plan Examination

Hearings Statement relating to Matter 2 / Issue 2



Settlement	Population	Hierarchy Tier		
Norwich urban area	213,166	1		
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Aylesham	6,016	2		
Hethersett	5,691		3	
Horsford	5,163			4
Poringland (including Framlingham Earl)	4,826		3	
Harleston	4,641	2		
Long Stratton	4,425	2		
Brundall	4,019		3	
Blofield	3,316		3	
Acle	2,824		3	
Reepham	2,709		3	
Hingham	2,367		3	
Loddon and Chedgrave	2,284		3	
Wroxham	1,502		3	

It is projected that delivery of the adjacent site will be complete by mid-2024, with an average of around 40 new homes per annum having been built and sold by then over the preceding decade (2013 – 2024).

The statement set out in paragraph 6.64 of the 'Sites Plan' that forms Part 2 of the Plan, that additional residential development in Horsford will be limited to only 20-50 new homes over the remaining 15-year period (i.e. 2023 to 2038) would appear at odds with the requirement in the NPPF that development plans be 'positively prepared', and a failure to continue with what has proved to be a very successful and consistent source of housing delivery.

Instead, a positive, justified and effective strategy would be to recognise and reflect the recent growth of Horsford. The lack of recognition of this growth is demonstrated in that the Plan does not even update the defined settlement boundary of Horsford to take account of the development granted permission over the past decade.

In planning for the next two decades, it would be wrong to fail to reflect this growth in population and plan properly for the needs of the growing community. Together with the recent and continued growth (the remaining permitted development is projected to be complete by mid-2024), additional housing growth could help support existing and new facilities and enable the village to become even more sustainable.

With respect to locational sustainability, Horsford is currently identified in the JCS as a Service Village, where there is a 'good level of services and facilities'. Moreover, the JCS identifies that Horsford is located within the Norwich Policy Area, where additional development might be considered acceptable.

This was most recently reflected in the grant of planning permission²⁰ for 45 additional homes on land immediately adjacent to the promotion site, with the planning committee report²¹ concluding:

*“Notwithstanding there is no demonstrable deficit in the supply of housing land within the Greater Norwich Policy Area, it is considered that **Horsford is a sustainable location for additional residential development...**”*

This additional 45 homes increases the number of homes currently being built on the land adjacent to our client’s site to 304.

Similar conclusions were reached in respect of the permission on a site to the south (ref. 2013/0547) for 125 dwellings, and in respect to the underlying permission (ref. 2016/1770) for 259 dwellings (committee report, para 9.44):

*“...**Horsford is a sustainable location for new development given the level of services which it offers...**”*

Within a few years, Horsford will have a population of around 5,000 or more (if it does not already). The Plan proposes that only a single site (ref. GNLP0264) be allocated for housing development, for 30-40 dws, which will provide new homes for only around 80 people. This will represent a growth rate over the latter 15 years of the plan period (2023-38) of just 1.6%, in the largest village cluster, that is acknowledged by the LPA to be a ‘sustainable location for additional residential development’.

This is not a Plan that has been positively prepared.

The ‘Sites Assessment Booklet’ for Horsford states:

“It is considered that as well as existing commitments and windfall development, approximately 20-50 new homes are appropriate for the Horsford cluster. In addition to the primary school, services include a shop, doctor’s surgery, village hall, library and public house.”

The introduction to the Site Assessment Methodology²², states:

“The scale of growth proposed within each ‘village cluster’ reflects school capacity or ability or grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12- 20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated ‘red’ (12- 20 dwellings), ‘amber’ (20-50 dwellings) or ‘green’ (50-60 dwellings) based on information provided by Children’s Services, although this is a starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools.”

As a methodology, this statement is distinctly insufficient and places undue and unjustified emphasis on unpublished advice from ‘Children’s Services’.

²⁰ Ref. 2019/0999

²¹ Para. 5.11

²² Para. 1.5

With the Booklet stating that:

“...it is considered that...approximately 20-50 new homes are appropriate’ for Horsford, it is assumed that the village has been rated ‘amber’ “based on information provided by Children’s Services”.

There is no other justification as to how the Councils have arrived at the figure of ‘20-50’ for Horsford.

The solution is straightforward: to recognise Horsford as the Key Service Centre that it truly is. It is one of the most populous settlements in the Greater Norwich area, it is barely a few kilometres from Norwich airport and various other employment areas, and **the R18A Growth Options document identified that the settlement possessed all core services and all secondary services** bar one – a Post Office; but there is indeed a Post Office in the centre of Horsford. In summary, Horsford should be reclassified as a KSC, and an appropriate and increased level of growth assigned to it.

In summary, the settlement hierarchy in the Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

Question 4. Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

Overall, the proposed distribution of growth, including the focus on the area around Norwich, is considered to be the most appropriate strategy, and is supported.

However, at a more detailed level the evidential basis for the selection of sites, and thus the distribution of growth across the settlement hierarchy / individual settlements is flawed (noting our response to Questions 2 and 3). The HELAA assessment is factually incorrect (and there is no evidence or justification for the non-allocation of our clients site).

The HELAA comprises three ‘volumes’:

- The December 2017 HELAA;
- The October 2018 HELAA Addendum I;
- The January 2020 HELAA Addendum II; and
- The December 2020 HELAA Addendum III.

The HELAA²³ explains that it:

“...presents [only] a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses.”

We submitted representations to both the 2018 R18B and 2020 R18C consultations. In 2018 we promoted our client’s site for up to 500 homes, whilst in 2020 this was reduced to up to 350 homes. Based on the information we provided in 2018, the site should have been reappraised but was not, instead it was erroneously stated that the site was being promoted for 600 homes – an error that the Councils acknowledged but have not corrected. Again, based

²³ Para. 7.5 and the Addenda

on the further, more detailed, information that we provided in 2020, the site should again have been reappraised, but was not.

However, despite the HELAA explicitly recognising and stating that it only represents:

“...a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses...”

the Councils have not sought to update any of the HELAA assessments carried out to date; in essence, the HELAA ignores all of the additional information submitted through previous consultations, at least on non-allocated sites.

By way of example, the HELAA still concludes that the two sites adjacent to our client’s – one which has been completed and one which is under construction, are ‘not considered to be suitable for allocation’ – the conclusions of the site assessments as contained in the HELAA clearly cannot be relied upon as accurate.

Instead, the submitted Site Assessment Booklet for Horsford²⁴ undertakes no re-assessment of our client’s site, continues to refer to 600 homes, and casts aspersions on its suitability based on unevidenced and incorrect assertions. This error is pertinent in that, despite the flawed technical assessment, the Booklet identifies²⁵ the site as a ‘reasonable alternative’ that is:

“... better located to the services in the village (and most particularly the school) when compared to the other large-scale sites in Horsford.”

This becomes particularly pertinent in that the Booklet²⁶ then explains:

“This site is not considered to be reasonable for allocation as the scale of the proposal is a concern...”

In short, the HELAA has dismissed the potential for a higher level of growth at Horsford by incorrectly appraising our client’s site; the HELAA assessment is thus flawed and factually incorrect.

In summary, the limited amount of growth assigned to Horsford, which despite being a village cluster, is the ninth most populous settlement, and recognised as a sustainable location for additional residential development, is not supported. A positive, justified and effective strategy would be to recognise and reflect the recent growth of Horsford and to provide for further growth to yet further improve its sustainability. As such, the Plan is not sound as it has not been positively prepared, is not justified, will not be effective and is not consistent with national policy.

Question 6. Is the identification of a supply buffer of 22% against the housing requirement justified?

No.

The Plan does not identify a ‘housing requirement’; however, it is evident, that the Plan proposes to use the Standard Method LHN figure (alone) as the ‘housing requirement’.

²⁴ Document B1.39

²⁵ See p. 14

²⁶ See p. 40

The 22% buffer proposed includes responses to two factors – demographic indicators and the economic growth strategy, that should have been incorporated into the assessment of 'housing need' and then the establishment of the 'housing requirement'. This would likely have resulted in both of these figures being higher, and thus the difference between them and the proposed provision (aka 'housing supply') – i.e. the 'buffer', being less.

Question 7. Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?

No.

The latest draft of the SNVCHAP includes no justification for this figure.

The opening section²⁷ of the SNVCHAP – 'explains:

“To meet the...requirements of the GNLP, the [SNVCHALP] needs to identify sites for at least a further 1,200 new homes.”

In the following section, Objective 1 does likewise, simply referring back to the GNLP and stating that the objective is to 'deliver housing in accordance with the GNLP housing target' of 1,200 homes.

Further the 'FAQs' document issued states:

“...Policy 7.4 [of the GNLP] sets out the level of housing growth in the village clusters...[and] notes that a separate [SNVCHALP] will be produced to include sites for a minimum of 1,200 homes.”

In other words, the SNVCLP makes it explicitly clear that the 1,200-home figure stems from the GNLP, not vice versa.

In summary, there appears to be no empirical justification for the 1,200-home whatsoever, it simply appears to be some sort of 'residual' figure. As such, it is not justified, will not be effective, and is not consistent with national policy.

²⁷ 'Introduction and Background'

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