



Greater Norwich Local Plan Examination

Matter 2 Hearing Statement

January 2022



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MATTER 2 – VISION, OBJECTIVES AND THE SPATIAL STRATEGY

Issue 2 – Housing Growth

Q4 Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

- 1.1.1 Gladman recognise and support the identification of the Norwich Urban Area as the most sustainable location for growth however query what evidence there is to justify directing over 66% of overall growth in the plan to the area. In directing growth to the Norwich Urban Area there is a fine balance to be struck between other elements of the settlement hierarchy to ensure the needs of the rural communities are not overlooked.
- 1.1.2 Housing delivery in the Norwich Policy Area has been a persistent challenge since adoption of the Joint Core Strategy in 2014. Seeking to provide an even greater number of dwellings in an already saturated market does not appear to be justified and does not strike the balance required between the other elements of the settlement hierarchy.
- 1.1.3 Latest available monitoring data, table 3.4 from the 2019/20 AMR below, clearly demonstrates the difficulties of meeting the adopted housing targets within the Norwich Policy Area whilst the rural areas, the lower tiers of the settlement hierarchy, have consistently delivered above the housing targets.

Table 3.4 Objective 2: to allocate enough land for housing, and affordable housing, in the most sustainable settlements

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Net housing completions	NPA – 1,825 per annum	LPA	NPA	1,164	1,810	1,685	2,382	1,624	R
	Greater Norwich area – 2,046 pa		Greater Norwich area	1,728	2,251	2,034	2,779	2,075	G
	Broadland NPA – 617 pa		Broadland - NPA	340	410	449	482	540	R
	Broadland RPA – 89 pa		Broadland - RPA	258	234	230	158	123	G
	Norwich – 477 pa		Norwich	365	445	237	927	495	G
	South Norfolk NPA – 731		South Norfolk - NPA	459	955	999	973	589	R
	South Norfolk RPA – 132		South Norfolk - RPA	306	207	119	239	328	G

1.1.4 Instead, a more modest increase towards the Norwich Policy Area with focus to the rural areas of the settlement hierarchy would be justified. The Main Towns and Key Service Settlements are clearly recognised for their sustainability, however their roles in the settlement hierarchy do not appear to be supported by the growth attributed to the individual settlements in these tiers.

Q5 To what extent does the distribution of housing sites across the settlement hierarchy reflect a policy down approach or one of site availability or previous commitments/allocations?

1.1.5 Gladman notes that 74% of the growth expected to come forward over the plan period to 2038 is from completions since the start of the plan period in 2018, permitted sites and existing allocations and commitments from the Site Allocations Plans, Area Action Plans for Wymondham, Long Stratton and the Growth Triangle and Neighbourhood Plans. Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise concern over the deliverability of these sites. It is clear that previous delivery rates have not matched targets and instead a change of approach from the top down is warranted.

1.1.6 In this regard, Gladman submits that further growth should be allocated to the Main Towns and Key Service Centres to ensure the housing need figure is delivered and to allow for greater flexibility. Offering a wider variety of sites to the market in varied locations across the Greater Norwich area will provide greater certainty that the housing requirement will be met.

Q6 Is the identification of a supply buffer of 22% against the housing requirement justified?

1.1.7 Gladman acknowledges and supports the GNLP in its provision of a 22% buffer above the local housing need figure. This is justified due to the extensive level and nature the of commitments making up the overall level of housing provision.