



HEARING STATEMENT

Examination of the Greater Norwich Local Plan

On behalf of:
Orbit Homes

In respect of:
Matter 2 – Vision, objectives and the spatial strategy
Issue 2 – Housing Growth

Date:
January 2022

Document Reference:
GA/DJ/00320/S0001

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Orbit Homes in respect of **Issue 2 Housing Growth** of **Matter 2 – Vision, objectives and the spatial strategy** of the Inspector's Matters, Issues and Questions (Part 1) for the Examination of the Greater Norwich Local Plan (the 'GNLP').
- 1.2 The Statement is intended to assist the Inspector's consideration of the soundness of the Plan and will form the basis of our points for discussion at the Examination Hearing session on 2nd February 2022.

2.0 Questions

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?

- 2.1 In our previous representations we set out that this figure was not sound as it does not take into account the likelihood that increases in housing need in Greater Norwich will exceed past trends because of growth strategies for the area (i.e. the Greater Norwich City Deal and the Cambridge Norwich Tech Corridor). We made the case that this is contrary to: NPPF paragraph 61 which states that the standard method should be used to determine the minimum number of homes needed, unless exceptional circumstances justify an alternative approach; and PPG ID: 2a-010 which specifically sets out that one such exceptional circumstance is the presence of clearly defined growth strategies that are likely to be deliverable such as housing deals.
- 2.2 In response to our concerns and those raised by others, a new Greater Norwich Local Housing Needs Assessment (Ref: B22.3) has been published. This report contains an assessment of whether the GNLP target of 33,000 additional jobs will be met by sufficient numbers of new economically active people based on the population growth associated with the standard method Local Housing Need. It shows that there is enough housing supply to meet the jobs target.
- 2.3 We have the following concerns regarding this assessment. Firstly, it is based on the assumption that high levels of in-community at 17.6% will continue (B22.3, p.53). This is surely not the optimum policy outcome. To promote sustainable commuting patterns, there should be an aim to reduce this figure by planning for enough homes to enable people to live close to where they work.

- 2.4 Secondly, the GNLP provides for significantly more employment land than is required for the scale of jobs growth proposed (i.e. 33,000 new jobs). One of the reasons given for this at GNLP paragraph 289 is that:

"The scale and range of our employment allocations facilitates choice and flexibility, provides for growth in the longer term and supports more ambitious levels of jobs growth if demand can be stimulated." (emphasis added)

- 2.5 In the Councils' response to the Inspectors' Initial Questions (Ref: D1.4A) they provide a similar justification for why the GNLP plans for around 9,000 more homes than the housing requirement. In the response to Question 12 (p.11-12) the Councils recognise that housing needs are likely to be higher than the standard method figure both due to the City Deal and as indicated by the 2018-based household projections.
- 2.6 It is therefore clear that the GNLP is proposing to allocate both more employment and housing land to account for likely higher levels of economic growth. This implies that they consider that the growth strategies for the area (i.e. the City Deal and the Cambridge to Norwich Tech Corridor) will deliver higher levels of growth. In which case, PPG ID: 2a-010 specifically sets out that the presence of clearly defined growth strategies that are likely to be deliverable is an exceptional circumstance that should be recognised in setting a higher housing requirement.
- 2.7 **Recommendation:** The housing requirement is increased to take account of the likelihood that increases in housing need in Greater Norwich will exceed past trends because of growth strategies for the area.

Question 4

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

- 2.8 No. It is contrary to the GNLP's Climate Change Statement set out at p.42-44. The decision to allocate an additional 1,682 dwellings to rural village clusters will not reduce the need to travel by private car or encourage the highest possible share of trips made by sustainable travel.
- 2.9 The Council's response to the Inspectors' initial question 8 (Ref: D1.4A, p.3) states that the level of growth in these clusters is just 9% of the overall housing growth, but this hides the fact that the actual decision being made in the GNLP is to increase the proportion of housing growth in these settlements from 7% of existing commitments to 16% of new allocations. Orbit Homes do not object to the allocation of some additional growth to these settlements where it is required to

support local services, but we consider that the current level of growth proposed is unsustainable. The vitality and sustainability of rural communities would be better served by allocating additional growth to the main towns that serve the rural parts of the district.

Question 6

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

- 2.10 Yes. A supply buffer is essential to ensure that the housing requirement set is actually met. Not all sites will deliver as quickly as initially forecast which is demonstrated in our discussion of the 1,800 home allocation in Long Stratton in our previous representations to Policy 7.2. This allocation was expected to deliver 1,800 homes by 2026 and it is now forecast to deliver just 300. In order to ensure a robust 5 year housing land supply for the lifetime of the plan it is essential that there is a buffer to allow flexibility in delivery timescales.
- 2.11 It is critical, however, that any buffer in supply is actually intended as such. As set out in our answer to question 1, it is clear from the Council's response to the Inspectors' Initial Question 12 (Ref: D1.4A) that there is a recognition that housing needs are likely to be higher than the standard method figure both due to the City Deal and as indicated by the 2018-based household projections (Question 12 on p.11-12). The currently proposed buffer appears to have been added in order to meet actual housing needs and not to provide flexibility in supply. There is a need to ensure the housing requirement is set correctly, before adding a supply buffer to it.

Question 7

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

- 2.12 No. As set out under question 4, we consider the level of development proposed to be allocated to village clusters to be unsustainable. Further, as set out in our previous representations to Policy 7.4, we object to the approach of producing a separate village clusters plan on the grounds that the level of growth proposed (11% of new allocations) is clearly strategic and the ability for this level of growth to be sustainably accommodated should be assessed as part of the GNLP.