



Greater Norwich Local Plan Examination – Matter 2 Statement: Vision, Objectives and the Spatial Strategy

Date: January 2022

For: Rosconn Strategic Land

Issue 2: Housing Growth

Q1. Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national policy and guidance?

The Plan's purported housing requirement, or more accurately its housing need figure, has been calculated using the standard methodology. The Planning Practice Guidance (PPG) is clear that the standard methodology does not produce a housing requirement figure and there are situations where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

The Partnership in its response to the Inspectors' initial questions [D1.3] outlines that the Plan includes a 22% "delivery buffer" over and above the minimum requirement to provide flexibility, substantially increase the supply of homes, future-proof the Plan against potential changes to the method of calculating housing need and to support the aims of the City Deal. These are good reasons to plan for an increased level of housing growth in Greater Norwich than that indicated by the standard methodology. However, in order for the Greater Norwich Local Plan (GNLP) to be effective in meeting these objectives they should be considered in the calculation of the housing requirement itself rather than expressed as a simple buffer. Without undertaking this exercise, the housing need figure of 40,550 homes is unsound for lack of justification as it has not been refined to factor in the need for additional growth above the minimum figure, despite the Partnership's clear view that more growth should be planned for than the figure suggested by the standard methodology.

In addition, despite the acknowledgement that further growth can and should be accommodated above the minimum figure suggested by the standard methodology, the approach within GNLP would see Greater Norwich's five year housing land supply and housing delivery test assessed against this minimum figure. Such an approach is not effective. It would not provide warning signs that the Plan's strategy was in danger of non-delivery nor would it trigger corrective action to ensure that an adequate pipeline of new homes was maintained against requirements.

The Growth Strategy Topic Paper [D3.1] illustrates that the delivery buffer is one of the Plan's more controversial aspects with many respondents expressing the view that it is either too high or too low. The delivery buffer of 22% comprises a significant scale of growth and there needs to be robust evidence to justify it. Whilst there are good reasons to plan above the standard method figure, an uplift beyond this should at least in part be considered through calculating the housing requirement for the purposes of clarity, transparency and greater objectivity so respondents can see how the scale of additional growth has been arrived at.

For the above reasons we consider that the Plan's housing requirement should be adjusted upwards to account for the extra growth required in the Plan area and to ensure that the Plan's strategy remains effective throughout the plan period.

Q2. Is the settlement hierarchy set out in Policy 1 appropriate and consistent with all the evidence?



We generally consider the settlement hierarchy to be appropriate in terms of each settlement's placement within it. However, the role and function of each settlement and how this has influenced the growth strategy is unclear. Similarly unclear is the role of the "Strategic Growth Area," which has had a significant impact on the content of the Plan in terms of the distribution of growth but which is not clearly situated within the hierarchy and which excludes sustainable settlements such as Long Stratton.

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

No. The distribution of growth through the settlement hierarchy continues the adopted Joint Core Strategy's (JCS) disproportionate focus on Norwich and its periphery. As set out in Rosconn's Regulation 19 representations the JCS has failed by a considerable margin to deliver the number of homes it envisaged.

The GNLP proposes a top-heavy growth strategy that is inflexible and this inflexibility is exacerbated by the focus of future housing growth on complex sites within the built-up area of Norwich such as the East Norwich Strategic Regeneration Area. Policy 1 identifies 32,691 homes as being delivered in the Norwich urban area over the plan period or 66% of the total supply. When accounting for urban windfall under Policy 7.5 this figure could be even higher and closer to 70% when, in 2011, approximately 55% of the plan area's population lived in the Norwich urban area. Whilst it is inevitable that Norwich as the principal conurbation within the plan area will act as a focal point for future growth, this should be considered in light of the scale of existing commitments at this location, which are significant.

Regulation 18A Sustainability Appraisal [B23.2] identified three options (Options 1, 2, and 3) that would see various concentrations of growth within Norwich urban area amounting to the delivery of 33,380, 32,280 and 32,080, respectively. The SA concluded that Options 1, 2 and 3 may be harder to deliver because they focus growth in locations that have already seen significant growth, have significant outstanding commitment and have experienced delivery issues of the JCS period. Despite this, the submission Plan proposes at least 32,691 homes (excluding urban windfall) for the Norwich urban area. Notably it did so with seemingly little consideration of the deliverability of either its proposed allocations or the strategic commitments identified under the JCS policy framework that had yet to come forward.

Additional deliverability evidence has been provided following submission of the Plan for examination within the Growth Strategy Topic Paper [D3.1]. Whilst RSL and other respondents were not given the opportunity to comment on this evidence at Regulation 19 stage, it only serves to underscore the material lack of progress with a number of strategic sites having not delivered significantly or in some cases at all many years after allocation within the adopted JCS. Three such sites are discussed below in response to Question 5 and in our statement addressing Matter 3.

Aside from the problems with deliverability, the chosen spatial strategy will not lead to a pattern of sustainable development. It will result in a significant long-term concentration of new homes in and around Norwich to the detriment of supporting sustainable rural communities such as the Main Towns and Key Service Centres. This will undermine the vitality of those rural communities contrary to the National Planning Policy Framework (paragraph 78) and reduce the choice and geographic range of new homes across the plan area.

The Main Towns have only been identified for 14% of the total housing growth, closely followed by the Key Service Centres at 9%. There is only a 5% difference of total housing growth between the Main Towns and the Village Clusters despite the significant sustainability credentials of the former when compared to the latter. This is not consistent with Policy 1's



stated approach of distributing growth in accordance with the hierarchy. The apportionment to the Main Towns must be increased if the Plan's overall housing numbers are to be deliverable and a sustainable pattern of growth achieved.

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?

The distribution of housing sites is heavily reliant on previous commitments and allocations some which remain unconsented and have not been reviewed to ensure they remain effective and justified against the evidence. Even where new allocations are proposed by the GNLP, these are often in areas with substantial pre-existing commitments/allocations suggesting that the Plan's distribution of growth is simply a continuation of the existing JCS strategy . However, Long Stratton remains a significant outlier to this approach with the town being excluded from accommodating net growth on the grounds of its existing commitment (circa 1,800 dwellings) when the size of commitment is no greater than other settlement where additional allocations have been proposed, including those of the same tier (e.g. Wymondham). As such there is little apparent consistency in how growth has been apportioned throughout the plan area.

Strategic allocations made under the JCS which have yet to receive outline planning permission should be reviewed and their long-term deliverability assessed as part of a comprehensive strategy that apportions growth in line with the settlement hierarchy whilst ensuring a balanced pattern of growth.

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

For the reasons set out in our response to Question 1 above we agree with the Partnership that there is a strong case to plan above the minimum level of growth suggested by the standard methodology. However, in order to be justified the scale of additional growth should be determined objectively and clearly evidenced as part of formulating the Plan's housing requirement rather than solely achieved through the application of a straightforward supply/delivery buffer.

Notwithstanding the above, we note that the Plan incorporates two particularly large and complex urban regeneration sites within Norwich which appear to have significant deliverability issues (see our Matter 3 statement) and which are assumed to deliver over 5,000 dwellings to 2038 equating to about half of the total delivery buffer. As such, there may not be as large a contingency against the minimum housing need figure there first appears and it will need to be carefully considered whether these strategic regeneration sites are deliverable for the number of units suggested within the plan period. If not, given that the Plan's 22% delivery buffer is a key part of its overall strategy, this should be retained through the identification of additional allocations.

Q7. Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?

No. As set out in our response to Question 4 above, the settlement hierarchy is skewed in that it is both top-heavy but also filters significant growth down to the plan area's least sustainable settlements, which are to accommodate comparable levels of growth to both the Key Service Centres and the Main Towns. We do not see how this approach aligns with the settlement hierarchy nor how it can lead to sustainable outcomes as it disregards the fact that both the Key Service Centres and Main Towns serve and underpin the sustainability of the wider rural hinterlands (as set out at paragraph 346 of the Plan). Accordingly, the best way to support



smaller rural settlements would be to support the growth of those principal rural settlements that serve them. The proposed 1,200 homes within the South Norfolk villages would result in an overly-dispersed pattern of growth which would encourage car dependence and fail to achieve the critical mass necessary to deliver affordable housing and other key infrastructure which is critical to the long-term viability and vitality of rural areas. Therefore we consider that the Plan should be changed to apportion the 1,200 homes to more sustainable rural settlements (i.e. Main Towns and Key Service Centres) and limit growth in village clusters to that necessary to support rural or local needs.