

Submission by Bryan Robinson

1. Matter 2 - Vision, objectives and the spatial strategy.

Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?

Issue 1.1 - Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?

1.1. It is assumed that the statement at paragraph 125 is an overall vision of the Plan:

As a result, by 2038 Greater Norwich will have vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment. Growth will make the best of Greater Norwich's distinct built, natural and historic assets.

1.2. This will be achieved through the 7 Strategic Policies.

1.3. The summary section of 'Topic Paper 1 – The Growth Strategy' contains two statements which can also be interpreted as part of the vision for the whole Plan which is based on growth:

1.3.1. The paper shows that the plan will ensure that Greater Norwich's housing and jobs needs from 2018 to 2038 will be fully met in a sustainable manner, supporting the growth of the post carbon economy in the area, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.

*1.3.2. This approach will both assist the ability to access external funding and **emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retailing, leisure, entertainment and cultural activities, and the NRP for employment, play as a driver of the regional economy, generating travel and contributing to the economy.** This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the **co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.** [Emphasis added].*

1.4. I question whether the Plan actually meets this vision and whether there are sufficient actions to ensure that the vision is achievable.

1.5. Climate change and environmental matters are discussed elsewhere.

- 1.6. I have serious concerns that the Plan does not emphasise the city centre as a regional centre for jobs with a deliberate realignment to the urban fringes.
- 1.7. An orbital route around Norwich along the urban fringes, as promoted by Norfolk County Council (NCC) for the Norwich Western Link (NWL) will, together with the proposals for employment allocations on this route, either deliberately or consequentially, compete with and probably supersede the city centre as the primary employment area for Greater Norwich.
- 1.8. Whilst not judging the merits of one or the other location as the regional centre for employment, there needs to be a full debate on the issue and whether an orbital route around Norwich will be a good or bad thing for the City.
- 1.9. My personal opinion is that a concentration of development at diverse locations at the urban fringes primarily along the recently completed Northern Distributor Road (NDR) will be disastrous for the city resulting in the reduction of office space; associated loss of small business reliant on the office staff; diminution of retail; and a greater reliance on the use of cars.
- 1.10. The concentration of employment allocated sites to the urban fringe within Broadland was instigated under the extant Joint Core Strategy (JCS) adopted in 2014 and the subsequent Development Policy Documents and forms the basis of the GNLP employment allocations.
- 1.11. Policy 6 lists various locations for employment along or near the NDR, all of which are designated sites in JCS and/or Broadland Site Allocations DPD.

Employment Site	Undeveloped area (ha)	Employment Uses
Norwich Airport	46.5	Aviation
A140/Broadland Northway junction (GNLP0466)	35	Focussed on uses benefiting from an airport location
Rackheath	25.6	General
Broadland Business Park, St Andrews Business Park and Broadland Gate	33.1	General
Total	140.2	

- 1.12. St Andrews Business and Broadland Business Parks are established assets which have attracted many businesses out of the City, although recently one of the larger companies, Aviva, have indicated that it will move back to the city centre.
- 1.13. Broadland Gate is a new Trade Park and the implications to retail trade elsewhere in Greater Norwich is unknown.

- 1.14. Norwich Airport was given outline permission in 2013 for an Aeropark of aviation related companies.
- 1.15. This scheme has since drifted into the ether and currently an application has been lodged for 50:50 split between aviation and general business use which is deliberately downplayed in the Plan by describing still the use as focussed on aviation.
- 1.16. The A140/Broadland Northway junction site is noted as ‘uses befitting from an airport location’, but there is a current outline application (20211959) for general Class B use plus a hotel and petrol filling station.
- 1.17. In the extant Site Allocations DPD in the Local Plan for Broadland this is site HNF2 and the glossary defines befitting from an airport location as:
- “B1, B2, B8 uses or similar sui generis uses for which it **can be demonstrated there is a significant benefit from being located close to the airport, for example in relation to the movement of goods, resources, etc. or the provision of goods or services for the airport or other uses ancillary or related to it.**”* [Emphasis added]
- 1.18. The definition was inserted at the instigation of the Examining Inspector for the document in the report dated 30 March 2016.
- 1.19. In June 2020 Norfolk County Council approved its own planning application for a recycling facility on part of this site for which the planning statement cited as justification for overcoming the benefitting test definition:
- “The ‘emerging’ policy in the GNLP has sought to change the emphasis of the policy to **allow a full range of employment uses including those benefitting from a location close to the airport.** The proposed recycling centre falls within a sui generis use which is a compatible use in an employment area as suggested by the hierarchy for the location of waste related facilities in policy CS6 of the CSM&WDMPDPD and would be consistent with ‘emerging’ policy in the GNLP.”*
- 1.20. It is noted that the definition for Employment Use benefitting from an airport location is omitted from the Glossary in GNLP confirming this intended relaxation to general use.
- 1.21. It will be interesting to see how Broadland determines application 20211959, noting that it supported the County’s recycling centre application despite the airport related restriction in the Site Allocations DPD.
- 1.22. The general use for application 20211959 has already prompted an objection from Norwich City Council that it will compete with the city centre for office provision and hotel accommodation.

- 1.23. The 140.2 hectares allocated on the NDR is far in excess of the 30.8 hectares in the city centre for office, digital and creative industries, retail and leisure provision.
- 1.24. It is acknowledged that the allocation in the city centre excludes the employment projections for East Norwich, which must be regarded as a further separate location discussed later.
- 1.25. There does not appear to be justification for the extent of general employment allocations along the NDR which is far greater than employment forecasts and is promoted as an 'encouragement to remove traffic from the city'.
- 1.26. Unfortunately this does not promise a reduction in traffic, only that it will be moved elsewhere.
- 1.27. Without firm commitments for public transport direct to these sites from hubs such as park & ride, the only connectivity, particularly from South Norfolk and Central Norwich, remains by car.
- 1.28. Looking at past employment trends suggest a bias to South Norfolk.
- 1.29. One of the measures in the Greater Norwich Annual Monitoring Reports is for the annual employment count across the three Councils
- 1.30. I extract the numbers as reported between 2008/9 and 2018/19 (there is no data for 2019/20 or 2020/21)

Council	2008/9	2018/19	Difference	Percentage
Broadland	40,800	48,000	7,200	17.6%
Norwich	92,700	89,000	-3,700	-4.0%
South Norfolk	42,200	56,000	13,800	32.7%
Totals	175,700	193,000	17,300	9.8%

Note: the 2018 employment numbers differ from the Avison Young Addendum report.

- 1.31. It will be noted that the employment growth is over the past 10 years is concentrated in South Norfolk, principally at the Norwich Research Park (NRP) and sites along the Norwich/Cambridge Tech Corridor.
- 1.32. Employment is set to continue in South Norfolk as the allocation of the following key Employment sites listed in Policy 6 for the Economy.

Employment Site	Undeveloped area (ha)	Employment Uses
Browick Interchange, Wymondham	22	General
Norwich Research Park/NNUH/UEA	39.6	Health, Higher Education and Science

Hethel	20.8	Advanced Engineering
The Food Enterprise Park	18.7	Agri Food Sector
Total	101.1	

Note: the FEP is included although it is in the Broadland Council area as it is more easily accessed from the south of Norwich.

- 1.33. As noted for Broadland this exceeds the 30.8 hectares allocated in the City Centre.
- 1.34. The importance of the City Centre has declined and will continue to do so with the disproportionate employment land allocations between the three districts.
- 1.35. If the vision is to *“emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retailing, leisure, entertainment and cultural activities, and the NRP for employment, play as a driver of the regional economy, generating travel and contributing to the economy”*, it fails by allocating most of the employment sites at the urban fringes and along a principle highway route.

Issue 1.2 - Are the plan’s objectives soundly based and consistent with the vision and the evidence?

- 1.36. Normally growth is promoted for the economy but the vision is based on a growth strategy for employment and housing numbers provision only, both based on arbitrary targets, with economic growth as a consequence.
- 1.37. There is a dichotomy of the term ‘sustainable economic growth’ in that continued growth using the limited natural resources cannot in the long term be considered as sustainable, particularly concerning the environment.
- 1.38. I have always been confused whether the principle is to create jobs then build houses for the workers or build houses which will attract families attracting investment to take advantage of the labour supply.
- 1.39. I refer to my original Reg. 19 submission and the references in the Appendix to the existing employment demographics as set out in Norfolk Insight which did not receive a response by the Partnership at the time, so I repeat these at this examination stage.
- The commuting patterns presented in Avison Young Employment Land Addendum are of interest and may have implications to the Employment to Housing numbers ratio for Greater Norwich in Reg. 19, leading to further investigation of other data.
 - Figure 14 on page 15 of the Addendum notes that in 2011 48,471 people came to Norwich area for work while 21,504 moved out of the area.

- Further investigation of the Nomis website for the 2011 census show that 33,659 people commute from outside the Greater Norwich districts to work in one or other of the three authorities.
- The number commuting out of the three authorities to districts outside Greater Norwich is 27,119.
- Assuming that that personal choice will be similar to the 2011 analysis, this would suggest that 15% of the jobs will be filled by people living in the surrounding districts of Norfolk and therefore will not require housing in Greater Norwich.
- On the same basis Greater Norwich will require housing for the outward commuting people if these trends are repeated. Although there is no direct relationship between the number of jobs in an area and those commuting outside the area, for comparison with the inward commuters only, this is 12.5%, giving a net reduction of 2.5% for homes not required with the new job targets.
- It is disappointing that authorities still do not realise that growth based on an increase in the number of jobs in an area not only might come from outside the area by choice, but if the number of jobs exceed the shrinking employment workforce pool over a period then increasing numbers must come from inward migration and this will be to the detriment of other competing authorities, both locally and nationally.
- The stark reality that never-ending continuous sustained growth for a region or the country cannot rely on the number of jobs which then in turn dictates the housing need for the area.
- The GNLP targets 33,000 jobs over 20 years of the plan while the 2019 unemployment figures in the ONS Nomis Official Labour Market Statistics show a total of 6,000 unemployed in the three districts prior to the Covid pandemic.
- Norfolk Insight gives indications of the population in 5 year age groups for the three authorities and using a crude measure over the next 20 years of those under 20 taking up employment and those over 45 retiring, there is a net loss of 15,791 employable people by the end of the plan.
- It must therefore be assumed that the plan is based on attracting the majority of the people from the employment pool from outside Greater Norwich to fill both the 33,000 extra jobs plus the extra vacancies from the net loss of 9,791 (15,791 – 6,000) existing jobs.

- This highlights another failure in the plan to recognise that travelling to work from a 30 or even 40 mile radius is considered normal for Norfolk and the plan should assess the response to job opportunities from other urban areas along the existing radial routes such as East Dereham, Great Yarmouth, Aylsham and Attleborough.
- If this is being repeated across the country in all local plans of all trying to attract the same diminishing workforce, clearly this is unsustainable.
- It is noted that the employee count since 2008/09 as shown in the GN Annual Monitoring Reports (GNAMRs) is grew at more than 1,900 average per annum while housing completions over the same period have averaged 1,655, a ratio of jobs to houses of 1:0.86.
- It appears disproportionate that the GNLP is now suggesting 2,475 houses annually for 1,650 new jobs annually a ratio of 1:1.5.
- I suggest that the plan needs to look more closely at the number of jobs being filled between 2008/09 and 2018/19 from the surrounding districts with the attendant implications for travelling and the environment.
- Recognising the fact that the domicile of employment labour is likely to change over the life of the GNLP though the proposed modal shift away from private cars and home working, the stimulus should not simply be on the creation of new jobs but creating an improved environment with jobs of a higher **productivity rate and wages** so that companies want to invest and people want to come to **live and work**.
- The emphasis on growth via extra jobs is only valid and sustainable if there is a large surplus of workers locally and nationally, which was not the case before the pandemic.
- One aspect which is not covered in the Plan or evidenced is why there are both inward and outward movement of people for jobs.
- This has prompted a further review of published statistics and data to understand existing patterns.
- The following is a table compiled from Nomis and Norfolk Insight.

	Broadland	Norwich	South Norfolk
Population & Employment (Nomis)			
Total Population 2019	130,800	140,500	140,900
In Employment (2019 – 2020)	66,200	80,300	70,700
Unemployed	1,500	3,000	1,500

Employee Full-Time	33,000	54,000	35,000
Employee Part-Time	15,000	35,000	22,000
Commuting Patterns (2011 Census)			
Net change Inward to Outward (total)	-14,387	26,888	-5,961
Inward to totals	18,858	48,392	22,686
Outward from totals	33,245	21,504	28,647
Outside Greater Norwich – Inward to	7,722	15,055	10,882
<i>Percentage of total</i>	41%	31%	48%
Outside Greater Norwich – Outward from	8,490	6,798	11,831
<i>Percentage of total</i>	26%	25%	41%
Employee Jobs by Industry (Nomis)			
Mining & Quarrying	500	50	45
Manufacturing	5,000	4,500	4,000
Electricity & Gas etc Supply	5	100	125
Water, Sewerage & Waste etc	300	225	700
Construction	3,500	2,500	3,500
Wholesale & Retail	8,000	16,000	7,000
Transportation & Storage	900	3,500	1,250
Accommodation & Food Services	3,000	6,000	3,500
Information and Communication	1,000	3,000	1,000
Financial & Insurance Activities	7,000	3,500	700
Real Estate Activities	900	2,000	800
Professional, Scientific & Technical	2,500	6,000	4,000
Administrative & Support Services	3,000	8,000	3,000
Public Administration etc	1,250	7,000	3,000
Education	3,500	12,000	4,000
Human Health & Social Work	7,000	8,000	17,000
Arts, Entertainment & Recreational	900	3,500	1,000
Other	600	2,250	1,000
Housing (Norfolk Insight)			
Number of Dwellings	58,930	67,160	62,980

- The highlighted cells show the predominance of a particular sector. It is assumed that the Financial & Insurance in Broadland is at the Broadland Business Park and the Human Health in South Norfolk is the Norfolk and Norwich University Hospital.
- The Financial and Insurance at Broadland Business Park is likely to change during the life of the Plan after Aviva's announcement to condense its office space and relocate to the City Centre.
- I did attempt to relate the target jobs and housing locations into the three districts but due to the chaotic format of the various documents admitted to failure.

- The questions arising from this data are:

Why is there a base need for 40,541 houses let alone 49,492 for 33,000 additional jobs which is a ratio 1:1.23 (or 1:1.50) when the existing ratio for all three districts is 1:0.83?

[Note: the existing ratio is comparable with the growth in GNAMRs over the past 10 years at 1:0.86 - see above]

How do the employment site allocations relate to housing locations?

With the considerable commuting as the 2011 census from outside Greater Norwich, what impact will this have on the ratio of housing to jobs?

Has any discussions taken place with neighbouring authorities concerning housing for jobs in Greater Norwich?

What is the judgement on whether 2011 commuting patterns will apply to the new jobs and if so what will be the implications for both the modal change away from the car and climate change?

1.40. These questions remain.

1.41. Housing numbers were arbitrarily increased between the Reg. 18 consultation and the Reg. 19 draft submission based upon a hypothesis of a draft Government paper which was later withdrawn but the increase housing numbers were left in the Plan.

1.42. The Plan does not state why the apparent random figure of 22% above Housing Need has been selected as the increase.

Issue 1.3 - Is the reference to clean growth and progression towards a post carbon economy based upon evidence and is it deliverable?

1.43. The plan states that "Growth of five sectors will help Greater Norwich to play a key role nationally and internationally in assisting the transformation to a post-carbon economy.

1.44. The five sectors are advanced manufacturing and engineering; agri-tech; energy; ICT/digital culture and life sciences.

1.45. This is at variance with the Avison Young reports which forecast that 77% of the jobs growth will be in health and retail.

1.46. Does this mean that the existing carbon economy outside these five sectors will disappear?

- 1.47. If nothing else the Covid pandemic has taught us that employment levels must be maintained in all sectors of the economy and it is naïve to say that future employment growth will be in specific sectors.
- 1.48. While the expansion of these sectors may be a laudable **ambition**, this should be a gradual movement while protecting existing important sectors such as tourism and traditional agriculture (as opposed to agri-tech) which have been the bedrock for many in the County; the proposed domination of new jobs by these sectors is out of kilter with existing employment by industry in Greater Norwich.
- 1.49. With a major change of the industrial base, there is also a need to ensure the back-up economic and social facilities keep pace with the change and the need for an assessment of implications for employment opportunities in these other sectors, which is absent from the Plan.
- 1.50. A major unanswered question is whether the growth is anticipated from within the existing populations or is the expectation from inward migration either from other parts of the UK or internationally?
- 1.51. The source of either local or migratory labour will be the major factor in housing need.

Issue 2: Housing Growth

Issue 2.1 - 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?

- 1.52. I suggest clarification is needed for the interpretation of the general **Housing Requirement**, which I deduce from the National Planning Policy Framework (NPPF) to be different to that of Housing Need.
- 1.53. My understanding of Housing Requirement is a **binding commitment** for the number of homes which the authority will deliver annually and is used in connection with the Government's annual Housing Delivery Test and the 5 year land supply.
- 1.54. NPPF (2019) requires a Housing Requirement figure but does not explain how this is to be calculated defining at paragraph 65 that the figure should show the "*extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.*"
- 1.55. GNLP does not specifically identify a Housing Requirement figure but describes the 49,492 homes at Table 6 as the "**total housing potential figure**".
- 1.56. Policy 1 uses the same figure in setting out in its accompanying table under the heading of "**Total Minimum deliverable Housing Commitment 2018 – 2038**".

- 1.57. In the absence of a figure described as Housing Requirement, must it be assumed that this statement of **commitment** is effectively the Housing Requirement for the Plan, equating to 2,475 annually.
- 1.58. The annual Housing Delivery Test is the main tool used by the Government for monitoring and resetting targets for land allocation and measures performance against housing requirement, which is calculated by the Government for each area and reflects any past under delivery.
- 1.59. It is therefore unclear how the Housing requirement/commitment for GNLP fits in with the general national policies and practices and the annual Delivery Test.
- 1.60. I fail to understand why a Plan should set a Housing Requirement in excess of the Local Housing Need calculation for the Housing Delivery Test and would appreciate clarification from the Partnership on how the two figures are used and why they should be different.
- 1.61. What is the basis for the Housing Requirement (commitment) being the same as the land allocations?
- 1.62. Even where authorities are meeting the delivery targets the minimum 'buffer' required for land provision over the next 5 years is 5% rising to 20% if targets are not being met.
- 1.63. Based on the 5 year supply for a Local Housing Need under the Delivery Test of 2,000 homes p.a., the 'running' annual allocation buffer would be between 500 (5%) and 2,000 (20%) compared to the 9,000 front loading of site allocations in GNLP.
- 1.64. If an Authority sets a very high commitment for the Housing Requirement, what are the implications if these are not met?
- 1.65. I assume that a built in buffer in the Housing Requirement in a Plan is permissible under NPPF but it would seem more appropriate to use the minimum Local Housing Need as the Housing Requirement commitment rather than an arbitrary figure determined from an excessive addition and manage growth through the annual Housing Test and 5 Year Land Supply.
- 1.66. As an aside, it would be useful to clarify in the Glossary which version of NPPF has been used for paragraph references in the Plan, which I assume to be 2019.
- 1.67. Compliance with this earlier version of NPPF is unfortunate as it does not contain the requirement for homes and places to be beautiful and as a consequence, equally regrettable that the Plan also ignores this aspect in setting expectation quality standards.

- 1.68. Although beauty is said to be in the eye of the beholder, by looking at the current developments taking place in Greater Norwich this eye seems to have a lower standard of beauty than mine.
- 1.69. How will the built quality standard to be strengthened through the Plan?.
- 1.70. The Local Housing Need is stated to be **40,451** as the minimum figure which has been identified using the Government’s standard methodology using 2014-based projections for the period 2018 – 2038. [see Table 6 in the draft Plan]
- 1.71. I have not seen a calculation of this figure and I am unable to reconcile it with my own calculations as below and would be grateful if the Partnership could provide its calculations with the data references.
- 1.72. Chapter 8 of the Greater Norwich Housing Needs Assessment dated July 2021 by OPS calculates the number as **39,440** based on annual figures of 1,972 x 20 years. [see figure 47]
- 1.73. This OPS annual calculation is based on the 10 year period between 2021 and 2031 from the ONS household projections in table 406 of the 2014-based spreadsheet and the 2020 affordability ratios from worksheet 5c of the ONS publication for house prices against workplace-based earnings.
- 1.74. I question why the calculation in the report was not undertaken for the period of the Plan 2018 to 2038 and the more appropriate (to the Plan date) 2018 affordability ratio.
- 1.75. My revised 2014-based calculations are:

	2018	2038	Increase	Affordability ratio (2018)	Adjustment factor	LHN
Broadland	55,885	63,282	7,397	9.27	1.329375	9,833
Norwich	64,740	74,562	9,822	7.01	1.188125	11,670
South Norfolk	58,214	70,949	12,735	8.74	1.29625	16,508
Totals	178,839	208,793	29,954			38,011

- 1.76. Confirmation of the calculation for a Housing Need figure is requested.
- 1.77. 43% of the household growth between 2018 and 2038 is forecast in South Norfolk with the lowest growth in Broadland.
- 1.78. To determine the site allocations as a comparison of the Housing Need by Local Authority is a time consuming exercise requiring various assumptions.

- 1.79. My deliberations conclude that the site allocations for each LA district are approximately Broadland 19,500; Norwich 8,500 (including East Norwich); South Norfolk 21,500.
- 1.80. Effectively Broadland has provision for 40% more than its adjusted Housing Need calculation; Norwich is 16% underprovided; and South Norfolk has a 23% surplus provision.
- 1.81. The discrepancy of Broadland can be related to carried forward commitment from the Growth Triangle in JCS.
- 1.82. The shortage of housing in Norwich and the surplus in the urban area of Broadland is likely to result in a migration of residents out of the city to where there is the greater provision of new housing stock.
- 1.83. Is this anticipated in the Plan and what will be the effect on the City Centre?
- 1.84. Or is it anticipated that more office space will be converted to housing under permitted rights to fill the shortage with a resultant diminution of employment opportunities but increases in housing?
- 1.85. There are already projects in the pipeline for converting empty office blocks in the city to student accommodation against the ambition for the city to be the driver of commerce.
- 1.86. Looking at age demography, an increase in the number of elderly people over the plan period is forecast, which is likely to result for the need for smaller properties.
- 1.87. The numbers and location of smaller properties for this aging population should be a critical consideration to ensure sustainable access to facilities and services.
- 1.88. As far as I can see there is no attempt in the Plan to determine property sizes within the settlement hierarchy which raises the question of how property types and sizes will be managed to accommodate the housing needs for increasing numbers of the older aged group.
- 1.89. The Partnership states in its document titled 'Response to Sustainability Appraisal Residual Effects from the Reg 19 GNLP' in answer to item 13 - "*The introduction of 110,367 new residents would be expected to result in increased pressure on the local water resource*", that the increase in the number of residents arising from the development is over-stated as a large proportion of the need for new homes arises from the existing population.
- 1.90. The 110,367 is stated in the SA by Lepus Consulting and not a calculation by the respondent.

- 1.91. It seems critical that the Plan authors and advisers should be basing assessments on the same agreed data and it is disturbing that there is a discrepancy of the number of residents associated with the proposed housing numbers.
- 1.92. The response suggests that if the 'household size' of the new properties will be smaller than the current average with an increase of single and two person occupancy.
- 1.93. This is confirmed in table 8 which notes in the density statement that there will be a greater number of 1 bedroom units than 5 bedroom units.
- 1.94. ONS has published 2018-based sub-national population projections for State Pension and working ages. The figures for Greater Norwich are;

	Working Age			State Pension Age		
	2018	2038	Increase	2018	2038	Increase
Broadland	74,779	83,252	8,473	33,442	41,496	8,054
Norwich	96,125	104,096	7,971	21,109	24,745	3,636
South Norfolk	79,775	98,621	18,846	33,325	44,488	11,163
Totals	250,679	285,969	35,290	87,876	110,729	22,853

- 1.95. I reconfigure the presentation of these numbers as;

	2018			2038		
	Working	Pension	Total	Working	Pension	Total
Broadland	74,779	33,442	108,221	83,252	41,496	124,748
Norwich	96,125	21,109	117,234	104,096	24,745	128,841
South Norfolk	79,775	33,325	113,100	98,621	44,488	143,109
Totals	250,679	87,876	338,555	285,969	110,729	396,698

	2018			2038		
	Total	Pension	%	Total	Pension	%
Broadland	108,221	33,442	30.9%	124,748	41,496	33.3%
Norwich	117,234	21,109	18.0%	128,841	24,745	19.2%
South Norfolk	113,100	33,325	29.5%	143,109	44,488	31.1%
Totals	338,555	87,876	26.0%	396,698	110,729	27.9%

- 1.96. It will be noted that the number of people over State Pension Age is expected to increase significantly, particularly in South Norfolk where this is forecast to be nearly 30% of the adult population increase over the 20 year Plan period.
- 1.97. This older generation are predominately couples or singles and where is the evidence of how the property sizes in the site allocations to accommodate these smaller households will be managed?

- 1.98. How will the plan ensure that the over provision in Broadland and South Norfolk will also be suited to the increase in the older aged group?

Issue 2.4 - Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

- 1.99. I would like to see evidence that the housing locations in the Plan align with the above household projections providing the approximate percentage split of Broadland 25%, Norwich 31% and South Norfolk 44%.
- 1.100. Housing targets from the Growth Triangle in Broadland carried forward from the JCS, together with the new allocations for that Council, would suggest an over provision of housing in excess of the ONS projections.
- 1.101. If the ONS projections are correct, it would seem that the Housing Requirement should be rebalanced in favour of South Norfolk and Norwich.

Issue 2.5 - 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?

- 1.102. The previous commitments in Broadland carried forward in to the GNLP suggest an oversupply in this Council area compared to the household projections forming the Housing Need figure.
- 1.103. The bias towards Broadland in the Plan is as a result of previous commitments, which may have influenced the introduction of the buffer to meet the Housing Need in South Norfolk to compensate.
- 1.104. A disproportionate allocation of employment sites is also provided in Broadland, mainly at the two airport and three Postwick sites, against the population growth in South Norfolk.
- 1.105. The workforce movement from South Norfolk is dependent on whether a stringent airport related use is maintained or relaxation for general development.
- 1.106. The consequence of general employment use in Broadland is likely to be a significant reliance on the private car from South Norfolk to these general employment uses as opposed to the specialist uses at the NRP and Norwich/Cambridge corridor.

Issue 2.6 - Is the identification of a supply buffer of 22% against the housing requirement justified?

- 1.107. The 49,492 homes in the Plan include a buffer of 22% above the Housing Needs of 40,451, which would equate to 30% against my revised assessment of 38,011. (paragraph 4.48 above).

1.108. The site allocations have been managed to equate to a 22% buffer on the housing need figure for the whole period of the Plan.

1.109. Under NPPF guidance a buffer is required for identification of sufficient land in annual 5 year returns.

1.110. The buffer percentages applicable to specific circumstances are set out in NPPF paragraph 74 as:

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”

1.111. Based on the existing JCS housing numbers, the Partnership is using the base 5% buffer, noting that completions 2015/16 to 2017/18 were 133% of the planned supply.

1.112. With a new Plan, I can see that this may have to be adjusted to 10%.

1.113. However, I do not see why this should be for the whole of the Plan period and for the total number of housing need.

1.114. The crucial phrase in the NPPF is that the buffer ***“is moved forward from later in the plan period”***.

1.115. With the housing need at 40,451 an annual figure over the period is 2,023. (Or 1,901 if the housing need total is 38,011)

1.116. The figure of 22% itself is misleading as this includes 5,240 homes already built in the first two year of the plan. [see Table 6 in the draft Plan]

1.117. The buffer percentage as the Plan on homes still to be built between 2020 and 2038 is 25.7% and on my revised housing need figures 35%.

1.118. The OPS July 2021 report gives an explanation of the affordability adjustment to the housing projections as

“Help respond to housing market pressures which have suppressed past rates of household formation.”

- 1.119. This relationship between household formation and house price affordability seems far too simplistic and it would be helpful to know if this is the government’s reasoning for the adjustment.
- 1.120. The more logical explanation is that it is an attempt to oversupply to reduce prices to attract more buyers.
- 1.121. Whatever the reason the affordability uplift can also be considered as a buffer above the projected new household formations needing housing.
- 1.122. Table 6 includes 1,296 an allowance for windfalls which is acknowledged as a limited reliance in the numbers against historic trends suggesting that 4,450 can be expected.
- 1.123. I fail to understand why the full 4,450 is not part of the buffer.
- 1.124. The justification for the buffer is stated at paragraph 178 of the Plan.

“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 to provide the potential to accommodate higher growth rates as signalled both by the Government’s “Planning for the Future” consultation and by the 2018- based projections for Greater Norwich which are somewhat higher than the 2014-based projections. The potential growth indicated by the 2018-based projections would equate to the identification of around 5,000 additional homes.”

- 1.125. I suggest that the Partnership provides evidence that 10% is the typical buffer allowance and explain why additional is required for mechanisms in a Government consultation which has since been withdrawn and the use of 2014-based projections confirmed.
- 1.126. As noted in my Reg. 19 submission, I fail to see why a buffer is required in the Plan when the management tool for housing numbers should be the annual 5 year land supply calculation which only requires a 5% buffer.
- 1.127. I am unable to exactly pinpoint where the new housing development is proposed across the three Councils, but note that 32,691 homes are provided in the Norwich Urban area out of the 49,492 total.
- 1.128. The City itself will provide 4,482 with another 4,000 in East Norwich regeneration totalling 8,482, which leaves 24,209 in the urban fringes.

1.129. Over half this number 13,507 will be provided in the extant JCS allocation of the Broadland Growth Triangle.

1.130. The site allocations do not match where the housing need is predicted for each of the three authorities.

Issue 3: Economy

Issue 3.1 - Is the identified need for around 360 hectares of employment land supported by robust and credible evidence?

1.131. The land for employment need as demonstrated by the data is considerably less than the 360 hectares as discussed elsewhere in the submission.

1.132. There is insufficient evidence for the classes of planning uses applicable to each designated location or the type of uses dependent on the 5 target sectors or health and retail as predicted by Avison Young.

Issue 3.3 - Do the key strategic employment locations set out in Policy 7.1 and Policy 6, together support the vision and objectives of the Plan?

1.133. I have noted concerns that the employment along the edges of an orbital road around Norwich which will be mainly car dependent will not support the vision or one of the principle objectives for a modal shift in transport preferences.

Issue 3.4 - Are the key strategic employment locations consistent with the spatial distribution of growth set out in the Plan?

1.134. This is largely dependent on the expectation of housing locations of the demographic change to an increase in the older aged groups.

1.135. If the extra working aged increased population growth has a preference to live in the rural areas and the older group in the urban area for access to public transport and amenities, employment locations may be better in the rural areas to assist reductions in commuting by car.