

Home Builders Federation

Matters 2

GREATER NORWICH LOCAL PLAN EXAMINATION

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?

6. Is it clear which policies in the Plan are strategic, and which are non-strategic?

The Greater Norwich Local Plan (GNLP) makes no distinction as to which policies are strategic and which are non-strategic as required by national policy. It would appear each of the seven policies are all strategic as the Greater Norwich Development Partnership (GNDP) have included each of these under the heading of the strategy. However, within each of these policies there are both strategic elements as well as development management requirements that would probably be considered to be non-strategic. The GNLP should make the distinction as to which aspects of each policy are strategic and which relate to development management in order to be consistent with national policy.

Issue 2 Housing Growth

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?

The level of need identified by the GNDP using the standard method is 2,027 dwellings per annum which, on the basis of the plan period results in a need of 40,551 new homes. This is based on the standard method using a base ten-year period of 2019 to 2029 and an affordability ratio from 2019. The GNDP recognises that the local housing needs assessment should be based on the most up to date evidence. On the basis of the most recently published evidence the GNDP's Topic Paper on policy 1 (Ref D3.1) outlines that using a 2021 to 2031 ten-year base period and the 2020 affordability ratio results in a minimum need of 1,972. However, in order to maintain consistency between plans and to reflect the Government's aspirations to boost housing supply the GNDP have decided to retain its housing requirement of 40,551 homes.



Including a housing requirement in the local plan that is above the minimum number of homes required to meet housing needs is in line with the objective of national policy of “*significantly boosting*” housing supply. However, Planning Practice Guidance (PPG) also recognises at paragraph 2a-010 there will be circumstances where needs will be higher than those arrived at using the standard method. This paragraph does not seem to have been considered by the GNDP in relation to Greater Norwich City Deal, which was agreed with Government in 2013, and the level of housing growth that this committed the GNDP to delivering between 2008 and 2026. The HBF considers the housing requirement should be higher than either of the minimum assessments outlined above in order to take account of the City Deal and ensure the GNDP deliver against its commitments.

Paragraph 18 of the GNLP notes that the growth requirements of the City Deal will be met through the GNLP. As set out in our representations the growth deal committed the Greater Norwich area to delivering not only the 37,000 homes between 2008 and 2026, as set out in their Core Strategy, but also a further 3,000 homes in addition to this target¹. Between 2008/09 and the start of this plan in 2018/19 total delivery, as set out in the GNDP’s monitoring reports, across the Greater Norwich area was 15,086² new homes. This leaves 24,914 new homes to be delivered between 2018/19 and 2025/26 in order to meet the number of homes required as part of the growth deal - significantly higher than the proposed minimum requirement of 16,212 homes obtained using the standard method

In terms of housing supply the latest delivery trajectory in D3.2B estimates that 21,859 homes will be built between 2018/19 and 2025/26 – circa 3,000 homes short of what is required to meet the growth deal. Ideally such a shortfall would be addressed prior to 2026. However, if the shortfall were to be addressed across the remaining plan period total need for the GNLP would be 49,238³. It would appear that the GNDP has the potential supply to meet this shortfall in the remaining plan period with the latest trajectory indicating the potential supply across the Greater Norwich area of over 50,000 new homes. However, whilst supply indicates that the level of development in the City Deal could be addressed no consideration appears to have been given as to whether the growth deal indicates that the GNDP should set a housing requirement above the minimum established using the standard method.

As outlined above the growth deal established that the Councils in the Greater Norwich area would, in return for £440m, deliver the 37,000 homes set out in the Core Strategy as well as unlock an additional 3,000 homes. The HBF consider it necessary that where there are agreements such as this to support the delivery of new homes that these agreements are continued across local plans and are reflected in the minimum number of homes that the GNDP are required to deliver. Such considerations are clearly the intention of Government with paragraph 2a-010 indicating that it is appropriate for

¹ Page 11 of the Greater Norwich City Deal, attached at Appendix 1 of this statement.

² Paragraph 3.24 of 2019/20 AMR indicates 20,326 new homes delivered between 2008/09 and 2019/20. On the basis that the most recent housing trajectory in D3.2 indicates delivery in 2018/19 and 2019/20 as 2,936 and 2,304 respectively.

³ Delivery required to meet the City Deal to 2025/25 of 24,914 added to minimum needs as set out in the GNLP for the remaining plan period of 24,324

Councils to consider where there are growth deals or funding to support new infrastructure that the higher growth requirements arising from such deal are reflected in the housing requirement. As such we consider the current housing requirement to be unsound as it does not take into account the Greater Norwich City Deal.

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

No comment

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

No comment

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

No comment

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?

No comment

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

Yes. Paragraph 60 of the NPPF establishes the minimum number of homes local planning authorities are required to plan for. In order to ensure this minimum requirement is delivered it is essential that there is sufficient flexibility in the land supply to take account of the fact that some sites will not come forward as expected and deliver fewer homes over the plan period. In addition to being consistent with national policy it also shows that the plan is deliverable over the plan period and as such must be considered to be effective. It is notable that the Joint Core Strategy for the Greater Norwich Area considered it possible to deliver 25,878 dwelling between 2008 and 2020, however during this period the 2019/20 AMR states at paragraph 3.4 that only 20,326 new homes were delivered – 21% lower than expected. This gives an indication as to the level of buffer required to ensure needs are met in full.

Indeed, other plans have been found sound with similar or higher levels of headroom to take account of potential delays in delivering strategic sites and ensure that the housing requirement could be met in full. For example, the Guildford Local Plan was found sound with a 36% buffer between the housing requirement housing land supply. It should also be noted that this degree of headroom was considered by the inspector examining the Guildford Local Plan as contributing to the exceptional circumstances required to justify amendments to Green Belt boundary. Whilst Green Belt is not an

issue for the GNLP it does show that even where constraints are significant a substantial headroom in land supply is considered a sound approach to plan making.

As such the HBF considers the principle of a 22% buffer between the housing requirement and housing supply to be sound as it provides the necessary flexibility to ensure the plan is effective in meeting minimum local housing needs. Indeed if, as we suggest above, the housing requirement were to be increased to reflect the City Deal it would be necessary for the GNDP to ensure that at least a 20% buffer between needs and supply is retained.

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

No comment

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