

HEARING STATEMENT FOR

GREATER NORWICH LOCAL PLAN EXAMINATION

MATTER 3

ON BEHALF OF BARRATT DAVID WILSON HOMES (EASTERN COUNTIES)

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004

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Matter 3 - Strategy for the Areas of Growth

Issue 5 - Small scale windfall housing development

Q.1. To what geographical area would Policy 7.5 apply? Would it apply to land on the edges of Village Clusters, Key Service Centres, or Main Towns? Would it apply to land within the South Norfolk Village Clusters Housing Site Allocations Local Plan?

The Local Plan¹ states the policy applies to all parishes, defined as 'small' or 'larger' with separate thresholds for each. The policy is not clear whether dwellings permitted under other policies will use up a parish's threshold. The policy should be amended specifically to permit self and custom build dwellings above the thresholds to boost their delivery. The smaller geographical extent of 'small' parishes will naturally limit the number of sites permissible adjacent to development boundaries.

Q.2. Would Policy 7.5 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

New dwellings will be permitted within the development boundaries of all villages under Policy 1. Therefore, some growth will occur in poorly served locations. Amending Policy 7.5 to deliver self and custom build housing will make it consistent with the requirements of the NPPF requiring policies to reflect the different housing needs of communities² to identify opportunities for villages to grow and thrive³.

Q.3. What does 'positive consideration will be given to self and custom build' mean in the context of the policy? Is this necessary? Is this justified? Is this an effective approach?

The term 'positive consideration' is ambiguous. Policy 7.5 should be amended to clarify how it will deliver self and custom build housing. Policy 7.5 should be the councils' principal

¹ Para. 389

² Para. 62

³ Para. 79

policy for securing self and custom build housing, rather than requiring the delivery of 5% of plots on major developments under Policy 5. This approach is consistent with the evidence of how the councils have met demand between 2016 and October 2020⁴.

The councils would still be able to assess the appropriateness of additional sites that came forward above the thresholds for self and custom build based on the other criteria of the policy. Principally, whether they respect the form and character of the settlement and would not result in an adverse impact on the landscape and natural environment.

The 'Greater Norwich Local Housing Needs Assessment' (LHNA)⁵ confirms that the councils have provided sufficient single dwelling plots to meet the numbers on Part 1 of their register. The LHNA also confirms that this has been achieved without any designated policy requirement for plots on larger sites⁶. This further strengthens the case for Policy 7.5, which will deliver more single dwelling plots, to be the principal policy for securing self and custom build housing.

Q.4. Is the policy effective in the way in which it would work? Is it justified that the policy allows 100% market housing?

Yes. It is inevitable that the policy will deliver 100% market housing. This is only justified if opportunities to deliver affordable housing are maximised elsewhere. This strengthens the case for reducing the burden of delivering self and custom build plots on larger developments where the specific needs of self-builders for separate accesses, site compounds, etc. could reduce densities and the overall numbers of homes that allocated sites deliver.

Q.5. Are the caps on development within each parish capable of operating effectively in the event that multiple applications are lodged around the same time?

Whilst the councils have confirmed that two acceptable applications submitted at the same

⁴ Para. 9.40 of the Greater Norwich Local Housing Needs Assessment (June 2021)

⁵ Para. 9.41

⁶ Para. 9.41

time could be approved⁷ any subsequent 'acceptable' applications would not be. The policy refers only to small scale residential development being 'permitted'. This does not guarantee that permitted sites will subsequently be built out. However, it does mean that once the threshold for 'permitted' dwellings within a parish has been met no other sites will be permissible under the policy, even if they comply with the other criteria of the policy. Amending the policy to remove the threshold for self and custom build housing will ensure that applications that may otherwise be refused, solely for exceeding the threshold, will be permitted.

Q.6. Is the assumed contribution of 800 dwellings from this source justified?

Based on the response to question Q.5 there is no certainty that as worded Policy 7.5 will deliver 800 dwellings as the thresholds for parishes will only be met by 'permitted' dwellings, which for one reason or another may not subsequently be delivered. However, by amending the policy to promote the delivery of self and custom build housing, by allowing the thresholds to be exceeded by self and custom build dwellings only, there will be greater certainty that Policy 7.5 will deliver the 800 dwellings accounted for in the Councils' housing numbers.

This approach would not result in the uncontrolled development of sites in the countryside as proposed dwellings would still need to be adjacent to existing settlements. The councils will still have the ability to assess the appropriateness of additional sites that came forward for self and custom build dwellings based on whether they respected the form and character of the settlement and would result in an adverse impact on the landscape and natural environment.

Recommendation: The wording of Policy 7.5 should be amended to read:

Small scale residential development will be permitted adjacent to a development boundary ~~or on sites within or adjacent to a recognisable group of dwellings~~ where:

- *Other than proposals for self and custom build, cumulative development permitted under this policy will be no more than 3 dwellings in small parishes or 5 dwellings in larger parishes (as defined in appendix 7) during the lifetime of the plan; and*

⁷ Document D1.3 para. 104

- *The proposal respects the form and character of the settlement; and*
- *The proposal would result in no adverse impact on the landscape and natural environment; and*
- *The proposal accords with other relevant Local Plan policies*

~~*Positive consideration will be given to self and custom build.*~~