

Home Builders Federation

Matters 4

GREATER NORWICH LOCAL PLAN EXAMINATION

Matter 4 Sustainable Communities and the environment.

Issue 1 Is Policy 2 justified, effective and consistent with national policy?

1. Is Policy 2 clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals?

No comment

2. Is the term 'as appropriate' sufficiently clear as to what kind and scale of development proposals Policy 2 would apply to? P62 of the Plan indicates that the policy would apply to minor developments. Is all this minor development? If not, which ones would it apply to?

No comment

3. Does Policy 2 apply to all applications or only those that fall within the thresholds identified within sections i-iv of the Policy?

For GNDP

4. Are the indicative minimum residential densities of 25 per hectare in the Plan area and 40 per hectare in Norwich justified and deliverable? Are they supported by the requirements on individual site allocations? Is it effective to describe minimum net densities as 'indicative' and does this imply that they are optional?

It is necessary for there to be flexibility with regard to the application of densities given that national policy sets out that whilst local plans should seek to make the most efficient use of land there will be circumstances where it is not possible to achieve the densities set out in policy. Therefore, to some extent they should be indicative and in decision making subject, as set out in paragraph 124 of the NPPF, to a range of other factors such as the character of the surrounding area, market conditions, viability, and the capacity of local infrastructure.

5. Is it clear what purposes Strategic Gaps are intended to serve and how development proposals within them will be assessed?



No comment

6. Is the proposed modification to Table 8 (in response to comments made by Natural England) justified? In order to be effective, should this be moved to the policy wording itself?

No comment

7. Is it justified to require housing development to meet the higher optional standard for water efficiency, and non-residential development to meet the BREEAM “Very Good” water efficiency standard, or any equivalent successor?

No comment.

8. Is it justified for Policy 2 to refer to a future optional water efficiency standard when any such standard, and the conditions for its adoption, are currently unknown?

The HBF recognises that in a water stressed area that the lower optional technical standard for water efficiency is justified. However, given that current policy requires the introduction of this standard to be evidence based there is a strong possibility that the adoption of a future higher standard within a local plan would also require further justification and an amendment to the local plan. Standards may change outside of the planning system through mandatory Building Regulations but as a developer would be required to use these standards no reference is necessary in the local plan to meeting future higher standards.

9. Is it justified for Policy 2 to require new development to provide a 19% reduction against Part L of the 2013 Building Regulations? The policy states that it will apply to “all new development” – is this justified?

Paragraph 6-012 of PPG outlines that local planning authorities can set higher energy performance standards but only up to the equivalent of part 4 of the Code for Sustainable Homes. As is highlighted in PPG this is approximately 20% above current Building Regulations. However, this will be superseded by the latest part L Building Regulations which, when adopted in the summer of 2022, set out what would be a 31% improvement on current Building Regulations. As such it may be prudent to delete the 19% requirement in policy 2 in order to avoid confusion. It will also be necessary for the GNDP to consider the impact of delivering the higher standards of energy efficiency that will be introduced on development viability.

10. Is it justified for Policy 2 to require ‘appropriate’ non-housing development of more than 500 square metres to meet the BREEAM “Very Good” energy efficiency standard, or any equivalent successor? How will it be determined whether a proposal is ‘appropriate’ in this regard?

No comment

11. The explanatory text states that master planning using a community engagement process will be required on sites for more than 500 dwellings or 50,000 square metres. However, the policy wording does not refer to this requirement. The policy wording does however refer to master planning being encouraged on larger sites and particularly for proposed developments of 200 dwellings or 20,000 square metres plus. Should the policy be modified to address this inconsistency? Does the policy need to be made clearer in this regard to be effective?

The GNDP should set out any requirements in policy and not in the supporting text.

12. Is it clear what form any master planning and community engagement is expected to take? Has any such requirement been considered in the assumed lead-in times for the delivery of larger sites?

For GNDP.

13. Is the requirement for developments of more than 100 dwellings to be accompanied by a delivery statement justified and effective? How would this work in situations where planning permission is secured in outline, or with the intention of disposing the land to a developer?

No comment

14. Is Policy 2 and the Plan in general, consistent with the provisions of the National Planning Policy Framework in respect of climate change?

No comment

15. Have all of the proposed requirements in Policy 2 been subject to viability testing?

No, the requirements for electric vehicle charging points have not been considered in the viability assessment. The HBF accept that electric vehicles will form a key part of the Government's strategy to reduce carbon emissions it is necessary for these to be properly considered with regard to their potential impact on the viability of new development. The GNDP needs to take account not only of the cost of installing charge points, generally considered to be around £1,000 per charge point, but also the potential infrastructure improvements to the local electricity network.

The HBF and its Members also have serious concerns about the capacity of the existing electricity network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the electricity grid to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially

jeopardise future housing delivery. Following the Government's announcement that all new homes with a parking space will be required to have a EVCP fitted from 2022 the details of this announcement are still to be set out in detail. However, the Government's proposal from its consultation in EVCPs in 2019 was to automatically cap charges to developers for upgrading local electricity networks at figure of £3,600 per charge point so clearly the costs could be significant and should be included in the viability assessment.

Issue 2 Is Policy 3 justified, effective, and consistent with national policy?

1. Does Policy 3 provide an appropriate policy framework for the conservation and enhancement of the areas built and natural environment? Is it consistent with national policy in this regard?

Whilst the requirement of all development to deliver a 10% net gain in biodiversity is consistent with the Environment Act 2021 there is no recognition in the plan that there is a two-year transition period from the Act receiving Royal Assent before this legal requirement comes into force. This should be recognised within the policy to ensure consistency with legislation. The 10% net gain in biodiversity does not appear to have been considered within the viability assessment. As we set out in our representations the Government's impact assessment of this policy indicated that the costs of meeting this requirement range from between £18,000 to £60,000 per ha and should be included within the viability assessment.

2. Is Policy 3 consistent with the HRA?

No comment

3. The supporting text refers to a contribution of £205 per new home made towards mitigation measures on protected sites. Policy 3 refers to this. Does this apply to all residential development across the Plan area including single dwellings? Is it justified and how would be it be implemented?

No comment

4. Map 8A sets out the Green Infrastructure Corridors in the Plan area. These are not reflected in Policy 3. How do these corridors relate to Policy 3? Should the policy include provision to preserve and enhance the Green Infrastructure Corridors?

No comment

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E