



# **GREATER NORWICH LOCAL PLAN EXAMINATION**

## **Examination Hearing Statement for Matter 6**

**Response on behalf of Pigeon Investment Management Ltd and their  
Landowners**

**January 2022**

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## **1. INTRODUCTION**

1.1 This Hearing Statement has been prepared by Pigeon Investment Management limited ("Pigeon") and their Landowners, in respect of a number of land interests within both Broadland and South Norfolk Districts.

1.2 Pigeon has previously submitted representations in response to the Greater Norwich Local Plan (GNLP) and the accompanying Sustainability Appraisal (SA), including the Pre-Submission Regulation 19 Publication Stage, where we submitted representations in support of the following sites:

- Land north of Brecklands Road, Brundall (GNLP0352)
- Land at Nelson Road, Diss (GNLP1045)
- Land at Walcot Green Lane, Diss (GNLP1044R)
- Land at Hethersett (GNLP4054, GNLP1023BR, GNLP4052, GNLP4052)
- Land at Dereham Road, Reepham (GNLP0353R)
- Land at Rightup Lane, Wymondham (GNLP0355)

## **2. MATTER 6 – HOMES (POLICY 5)**

**Issue 1 – Is the policy for affordable housing justified, effective and consistent with the evidence and national policy?**

**Q1. Are the requirements for affordable housing set out in Policy 5 justified by the evidence?**

**Q2. Is the 33% requirement across the Plan area outside of Norwich City Centre justified by the evidence?**

**Q3. Is the 28% requirement for Norwich City Centre justified by the evidence? What is the evidence which leads to this being a lower figure than that for the plan area?**

- 2.1 The GNLP proposes to deliver 49,492 homes over the period 2018-38 as compared to the need identified in the SHMA (Document B22) for 44,174 homes over the period 2015-36 – a 15% increase in supply. If this is achieved, this will have beneficial effects on the accessibility of the housing market compared to that assumed in the SHMA, such that it would be expected that a lower proportion of households will fall into affordable housing need. As such, the need for 25% affordable housing identified in the SHMA should be treated as a maximum.
- 2.2 The latest Annual Monitoring Report indicates that 1,625 of the existing commitments are on sites of 9 homes or less and so the available evidence indicates that circa 40,531 homes will arise from major development sites if the trajectory is achieved.
- 2.3 Therefore to deliver the full affordable housing need of 11,063 affordable homes even assuming that all of this is delivered on the 40,531 homes proposed to be delivered on major development sites without any contribution from small exceptions sites, it would only be necessary for 27% of housing to be provided as affordable housing on these major development sites.
- 2.4 However, Policy 5 requires the delivery of at least 33% affordable housing on major development sites except in Norwich City Centre where at least 28% affordable housing is required. The available evidence demonstrates that this level of affordable housing is not required.

**Summary: The percentage requirements set out in Policy 5 are not justified.**

## Issue 2 – Accessible and Specialist Housing

### Q1. Does the Plan make adequate provision for older person's accommodation?

- 2.5 The GNLP identifies (para. 276) a need for 3,857 specialist retirement units in the plan area over the period 2020-38; however this is based on evidence that is not currently publicly available. It is unclear whether the reference to 'specialist retirement units' includes or excludes residential institutions, or whether this reflects only the need for supported accommodation such as sheltered housing, assisted living and extra care housing. The necessary evidence will need to be published to justify the identified need and to clarify precisely which forms of accommodation this includes.
- 2.6 Paragraph 277 then identifies that the GNLP contains allocations to provide such accommodation at Colney Hall, Taverham, Aylsham, Harleston and Barrack Street, Norwich. The proposed allocation at Barrack Street, Norwich (GNLP0409) however makes no reference to the provision of retirement housing. The remaining proposed allocations provide:
- (i) a dementia care unit of approximately 80 beds and approximately 120 units of extra care at Colney Hall (GNLP0253);
  - (ii) 1,400 homes including an unspecified amount of specialist care housing at Land between Fir Covert Road and Reepham Road, Taverham (GNLP0337);
  - (iii) a 90 bed care unit/extra care housing at Land at Norwich Road, Aylsham (GNLP0596); and
  - (iv) a 90 unit extra care housing scheme at Land at Briar Farm, Harleston (GNLP2136).
- 2.7 In combination, these sites will provide for approximately 170 beds in residential institutions, 210 extra care units and the opportunity for an unspecified number of specialist units but almost certainly significantly less than 1,400 at Taverham. There therefore clearly remains a significant unmet need for retirement homes and/or beds in residential institutions to address the identified need for 3,857 units over the period 2020-38.

**Summary: The GNLP fails to provide sufficient retirement homes and/or beds in residential institutions to address the identified need for 3,857 units over the period 2020-38.**

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**Q3. Is the requirement of at least 20% of homes on major housing development sites to conform to the Building Regulations M4 (2)(1) standard justified?**

2.8 Appendix 11a (A8.19) to the Statement of Consultation (A8.1) states (page 182 and 185):

*"... the requirement for at least 20% of homes to meet Building Regulation M4(2) for adaptable homes this is considered justified, given the context of an ageing population."*

2.9 However, there does not appear to have been any assessment of the need or otherwise for the application of this standard within the plan area as whole or within individual settlements.

**Summary: This aspect of Policy 5 is, evidentially, unjustified.**

**Issue 5 – Self/Custom Build Housing**

**Q1. Is the requirement for at least 5% of plots on sites of 40 dwellings or more to be self/custom build housing justified by the evidence and consistent with national policy? Has this requirement been subject to viability testing?**

**Q2. Is there evidence to indicate that this level of provision will be delivered?**

2.10 The requirement for at least 5% self/custom build housing is not justified by the evidence. National Policy requires an assessment of the need for self-custom-build housing is undertaken and reflected in planning policies.

2.11 As detailed in the Housing Topic Paper (Reference D3.6), this assessment has not been undertaken. Whilst we support the desire to increase supply by meeting the needs of those wishing to build or design their own homes, the requirement for 5% of plots to be self/custom build is not justified.

2.12 In our experience, many households wishing to build or design their own home wish to do so on plots in rural areas or villages, rather than in urban locations. As such, we do not consider that the policy will deliver this level of provision, notwithstanding the need for it to be evidenced. This issue is compounded by the level of growth that the GNLP directs towards the Norwich Urban Area, which is unlikely to meet the needs of the vast majority of self/custom builders.

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- 2.13      Once, the need for self/custom build homes has been assessed, then specific site allocations should be identified to deliver self/custom-build homes in locations which are more likely to meet the needs of self/custom build market.

**Summary: The requirement for 5% self-build is not justified by evidence or consistent with national policy.**