

Greater Norwich Local Plan Hearing Statement Matter 15 Housing Provision

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

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The Councils have responded to each question directly in the body of the Hearing Statement.

Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? In particular:

Question 1

Should Table 6 of the Plan be updated to a base date of 1st April 2021?

Response to question 1

1. The Partnership is of the view that Table 6 does not need updating in order to achieve a ‘sound’ plan. Yet should the inspectors be of a different opinion the Partnership would do this work as part of the plan’s modifications.

Question 2

Taken as a whole, do any alterations to the site specific delivery assumptions (arising under previous matters) significantly alter the overall housing land supply position?

Response to question 2

2. This question will be definitively answered as the examination hearings proceed. But at the time of writing (31st January 2022) no significant changes are expected about the delivery of individual site, and as a consequence the Partnership does not expect the overall housing land supply position to alter.

Question 3

Is it justified to identify contingency sites within the Plan?

Response to question 3

3. The Partnership remains of the view that to identify a contingency site is justified, as stated at paragraph 181 of the Strategy ([A1](#)): “To provide additional flexibility to ensure housing need can be met, a contingency site at Costessey for around 800 homes is included in this plan should this prove to be required due to low delivery of allocated housing sites.”

Question 4

Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?

Response to question 4

4. This question is dealt with in Appendix 4 of the Policy 1 Topic Paper ([D3.2](#), pages 19-20), which says there will be a land supply of 6.4 years on April 1st 2023.

Question 5

Are the assumptions for homes to be delivered on existing commitments justified? Will 31,452 homes be delivered on these sites between April 2020 and 2038?

Response to question 5

5. The Partnership through its annual monitoring for the five-year land supply statement knows when existing commitment sites are set to deliver and this information forms the basis of the latest housing trajectory ([D3.2C](#)). An overview of the housing trajectory is given in document [D3.2B](#) (at Table 4), which provides figures for the total housing supply. One of which is the ‘moderated’ supply of 48,132 homes and the other is the ‘potential’ supply of 50,307. The difference in these two figures relates to if certain existing allocations build out fully or not by 2038. In question are three existing commitments, where some later phases of the development may come forward after 2038. These total 2,145 homes, and comprise 1,270 homes at Beeston Park, 875 homes at North Rackheath, and 30 homes at Long Stratton

Question 6

Can the market absorb the number of additional homes envisaged in and around Norwich City Centre? Is this supported by demonstrable evidence?

Response to question 6

6. New homes in the City Centre are characterised by higher density schemes, which usually feature flats. This type of development has increased in recent years, as is shown by completions data in Norwich when in 2018/19 927 homes were completed, and then 495 in 2019/20. Notable schemes that have recently completed or are on site includes St Anne’s Wharf (16/01389F), Sentinel House (19/01405/MA), Barn Road (18/01315/F), St Stephen’s Street/Crown Place (17/00357/F), and Kerrison Road (17/0109/F). The Partnership is therefore confident that the market can absorb the additional homes that will come forward on higher density Norwich sites.
7. Another factor is that there is a strong need for flats, which will typically be delivered by higher density City Centre sites. Evidence for this is found in the Local Housing Needs Assessment ([B22.3](#)). In which it says at Figure 51 there is a need for 2,431 one bedroom flats and 2,701 two bedroom flats.

Question 7

Is there compelling evidence that the proposed windfall allowance (of 1,296) dwellings will provide a reliable source of supply?

Response to question 7

8. The windfall allowance of 1,296 is set at 100 homes per year from 2025/26 to the plan’s end-date. It is a cautious estimate that existing trends in windfall development will continue and is based on the current methodology the Partnership has. This methodology is explained in the Housing Land Supply Assessment, found in

Appendix A (Part 1) of the Annual Monitoring Report 2019-20. Also, a short summary of how the Partnership calculates windfall was given in the answer to question 17 of the Inspector's Initial Questions ([D1.4A](#)).

Question 8

What confidence is there that the South Norfolk Village Clusters Plan will identify sites for a minimum of 1200 homes and these sites can be delivered by 2038? Is it appropriate for this to be a minimum requirement?

Response to question 8

9. The South Norfolk Village Clusters Plan is moving ahead on a timetable, which aims to publish a pre-submission version in spring 2022, and to submit the plan to the Secretary of State in summer 2022. Having completed a Regulation 18 consultation in summer 2021 there is confidence that sufficient sites can be found to provide 1,200 homes. It is appropriate too that 1,200 homes is a minimum in order to give flexibility, so that appropriate sites do not have to be reduced or entirely ruled out if they exceed the strategic requirement.

Question 9

What confidence is there that the Diss and area Neighbourhood Plan will identify sites for 250 dwellings and that these sites can be delivered by 2038?

Response to question 9

10. The Partnership is confident in the work that has and is being done for the Neighbourhood Plan. In terms of latest news, the Steering Group is preparing a further Regulation 14 consultation that is due to start in March. This has been prompted by the Steering Group wanting to amend some of its policies in respect to the Diss Business Park, and the Waveney Quarter; and, to amend a site allocation in light of a recent appeal decision. These changes are not anticipated to unduly delay the Neighbourhood Plan, and the Steering Group aims to submit the final Neighbourhood plan to South Norfolk Council in May later this year.

Question 10

Does the Plan identify that at least 10% of the housing requirement will be met from sites no larger than one hectare in accordance with Paragraph 69 of the Framework?

Response to question 10

11. As stated in the Strategy ([A1](#), paragraph 188, bullet point f), 12% of the homes will be provided on sites of 1 hectare or less. To evidence this a list of smaller sites is provided – see appendix 1 to this matter. However, in summary 6,143 homes can be delivered on smaller sites, by counting existing planning permissions, current allocations, and new allocations. This divides as 3,272 homes in Norwich across 238 sites, 484 homes in the Urban Fringe across 129 sites, 644 homes in the Main

Towns across 166 sites, 287 homes in the Key Service Centres (KSCs) across 140 sites, 570 homes in the Broadland villages across 191 sites, and 886 homes in the South Norfolk villages across 419 sites. Furthermore, more flexibility towards small-scale housing developments is provided by policy 7.5.