



GREATER NORWICH LOCAL PLAN EXAMINATION

Examination Hearing Statement for Matter 15

Response on behalf of Pigeon Investment Management Ltd and their Landowners

February 2022

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 15 – HOUSING PROVISION

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:

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

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?

- 2.1 Under Matter 2 we set out how, in calculating the housing need, the Plan does not follow the process set out in the PPG – whilst it takes demographics and economic growth into account it does so in relation to identifying housing sites, not as part of identifying housing need.
- 2.2 In matter 2 we set out that, taking demographic indicators into account results in a local housing need of approximately 45,100 homes, and that taking economic indicators into account could increase this figure to a total of 47,350 – 49,610.
- 2.3 On that basis we concluded that it would therefore be appropriate to establish a housing requirement of approximately 49,600, and that adopting the approach taken in the GNLP of including a 10% deliverability buffer would result in sites having to be found for approximately 54,560 homes, some 5,000 more than proposed in the Plan.
- 2.4 In short, the conclusions that we reached in relation to the housing requirement need to be reflected in Row A of Table 6.
- 2.5 Supply considerations relating to individual sites and supply assumptions then need to be reflected in Rows B to G of Table 6; undoubtedly there will need to be changes as a result of the detailed discussions under Matters 9 to 14, and as a result of other considerations.

- 2.6 These amendments will likely result in a reduction to the projected supply, possibly by thousands of homes. With a revised housing requirement already exceeding the projected supply by some 5,000 homes, it is clear that additional deliverable, and developable, sites need to be identified; these changes will then require further updates to Table 6.
- 2.7 Summary: Table 6 should be amended to reflect any revised housing requirement, any amendments to the projected supply, updated to 1st April 2021, and further updated every year thereafter.

3. Is it justified to identify contingency sites within the Plan?

- 2.8 If national policy and guidance are properly followed, and sufficient sites identified to meet the Local Plan housing requirement, plus a suitable buffer to ensure delivery, there is no need to identify a contingency site.
- 2.9 We have discussed the proposed contingency site in more detail under Matter 9 / Issue 4.

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?

- 2.10 It remains uncertain whether the Diss & District Neighbourhood Plan will identify sites sufficient to deliver 250 homes. The Plan is yet to be submitted to the Local Planning Authority and remains unclear whether it will meet the statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

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

- 2.11 It remains uncertain whether the South Norfolk Village Clusters Plan will identify sites sufficient to deliver 1,200 homes.