
Greater Norwich Local Plan

Local Plan Examination
Hearings Statement relating to:
Matter 15

On behalf of
Barratt David Wilson Homes (Eastern Counties)



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Matter 15 – Housing Provision

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

Yes.

However, and of more importance, is that Table 6 (in Part 1 of the Plan) – ‘Establishing the Plan’s total housing potential figure’, should be updated to reflect a properly-established and justified housing requirement.

In relation to Matter 2 the Partnership commented that references to the ‘housing target’ should be amended to instead be references to the ‘housing requirement’. It is therefore assumed that the Partnership proposes that Row A in Table 6 should be amended from:

“Local housing need (2018 to 2038)”

to:

“Local Plan Housing Requirement (2018 to 2038)”

However, as we set out in relation to Matter 2, the Plan does not follow the required approach to properly establish a housing requirement.

To recap, the Partnership has taken into account demographic indicators and economic growth drivers, but as part of the supply, rather than as part of establishing a housing requirement.

In relation to Matter 2 we explained that the consideration of these factors by different parties would lead to different conclusions as to what represented a properly-established and justified housing requirement.

However, for the purposes of this Question:

- Utilising the latest household projections would result in a Standard Method Local Housing Need of approximately 45,100 homes; and
- Adding a 5-10% uplift in response to economic drivers (either figure would require justification) would increase this housing need figure to 47,350 – 49,610. (A mid-point between these figures would be 48,480 homes.)

The Partnership has not yet responded, in writing, to the points we raised in relation to Matter 2, so it is unclear what revised ‘housing requirement’ figure it might arrive at.

It is therefore proposed that, for the purposes of answering this question, and in the absence of a response from the Partnership to the ‘housing requirement’, Row A of Table 6 should be viewed as being approximately 48,500 homes. This is the figure that should be included in Row A of Table 6.



With regard to whether Table 6 should be updated to a base date of 1st April 2021, it is considered that whilst this would be helpful, it would not address the over-riding issues discussed both above, and below, in relation to Question 2.

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?

Yes.

In part the answer to this question will depend on the outcome of / conclusions drawn from the discussion on Matters 9 to 14.

The Policy 1 Growth Strategy Topic Paper¹ explains that the Partnership considers that a ‘delivery buffer’ of 10% is appropriate.

Adding this to a ‘housing requirement’ of 48,500 homes as we suggest above in relation to Question 1 would necessitate the identification of sites sufficient to deliver 53,350 homes – 3,858 homes more than the total projected supply set out in Table 6.

However, in relation to Matter 2, we also heard the case that the ‘delivery buffer’ should be greater than 10% - if set at 15-20%, it would necessitate the identification of sites sufficient to deliver 55,755 – 58,200 homes – approximately 6,200 – 8,700 homes more than the total projected supply set out in Table 6.

In relation to Matter 2, an analysis² of the individual sites suggested that the deliverable supply from all specific deliverable sites was in fact not 39,596 homes, but rather 29,864, some 9,732 fewer homes.

In summary, this suggests that Table 6 should be amended as follows:

		GNL Table 6	Properly-Established Housing Requirement	Properly-Established Housing Requirement + Actual Deliverable Supply ³
A	Housing Requirement	40,541	48,500	48,500
A1	Housing Requirement +10% Buffer	44,500	53,350	53,350
G	Projected Supply	49,492	49,492	38,400
	SHORTFALL (G-A1)	n/a	3,858	14,950

Overall, it is considered clear that additional, robust-identified sites, are required, sufficient to supply several thousand, and possibly many thousand, more homes than currently provided for.

¹ D3.2, Appendix 3, p. 17

² E2.19

³ E2.19

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

No.

Generally, the Local Plan should (NPPF para. 68):

“... identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability ...”

The NPPF continues (ibid):

“Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

The Plan makes it clear that the Costessey contingency site will be ‘allocated’ if housing supply over three consecutive years falls below 85% of the ‘annual target’. In other words, the Plan is clear in that the contingency site is proposed to address the, short-term, potential under-supply of housing. Accordingly, the Policy 1 Growth Strategy Topic Paper⁴ states that the Costessey contingency site has been retained:

“... to ensure that housing needs will be met through the plan”.

However, if national policy and guidance are followed, and a sufficient supply and mix of sites are identified following a robust assessment process, then there will be no need for the identification of a contingency site.

Question 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?

None.

The Village Clusters Plan has not yet been refined beyond Regulation 18 stage, and it is unclear whether it will be successful in robustly identifying sufficient sites to meet the 1,200 home minimum, let alone any buffer to ensure delivery.

⁴ D3.1, para. 117

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