



Greater Norwich Local Plan Examination

Matter 15 Hearing Statement

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MATTER 2 – HOUSING PROVISION

Q1 Should Table 6 of the Plan be updated to a base-date of 1st April 2021?

1.1.1 In order to ensure that Table 6 provides the most up-to-date position and takes account of delivery during the year 2021/21, a modification should be made to update the base-date of Table 6 to 1st April 2021.

Q3 Is it justified to identify contingency sites within the Plan?

1.1.2 Gladman in part support the identification of additional sites in order to build greater flexibility into the Plan, however we contend that it would be more appropriate to allocate the land as opposed to identify it as a contingency. Allocating the land for housing provides the greatest level of certainty that the site can come forward without delay, is available and deliverable for housing and reduces the need for a future review.

1.1.3 Whilst Gladman is in part supportive of the GNLP's identification of additional sites in order to provide greater flexibility, we have doubts in relation to the suitability and logic of identifying Costessey as the location for the contingency site. The Plan intends for the contingency site to be brought forward if delivery of housing in the GNLP area does not meet local plan targets. Gladman contend that the current location of the contingency site is fundamentally flawed. If the market around Norwich is failing to deliver new homes around the edge of Norwich, providing further land for development in the same location is not going to resolve the matter.

1.1.4 Gladman therefore submit that a more appropriate location would be around the edge of Wymondham as was originally proposed in the Regulation 18 consultation. A site in this location would offer an alternative choice over more new homes on the edge of Norwich and would be capable of providing additional infrastructure to meet the future needs of the town.

Q5 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?

- 1.1.5 Gladman has serious concern in relation to the GNLP's reliance on existing commitments, especially as 74% of the future growth through to 2038 across Greater Norwich is expected to come from these existing commitments, which consist of extant permissions and existing allocations in Site Allocation Plans, Area Action Plans and Neighbourhood Plans.
- 1.1.6 A number of the sites included within the commitments have simply been rolled forward from the previous allocation and area action plans without further evidence being provided in relation to their deliverability. Given that these sites have failed to be delivered since the adoption of these plans in 2015, Gladman has significant doubt over the prospects of them coming forward within this plan period and are not satisfied that sufficient evidence has been provided to the examination to prove otherwise, save for statements of common ground. Gladman accept that it is right that existing commitments count towards the total requirement however we contest that without extant permission, or clear, empirical evidence of their deliverability, relying on the source to the extent which the GNLP does seriously risks undermining the aspirations of the GNLP and could result in the failure of the Plan to deliver the required quantum of new homes.
- 1.1.7 The over reliance on existing commitments is even more pertinent in the Main Towns where the GNLP relies on the source for 75% of planned growth and as a way of justifying only allocating 150 dwellings in Wymondham and no new homes in Long Stratton. Within Long Stratton the GNLP is reliant upon the east Long Stratton extension to deliver the Town's new homes, however despite an Area Action Plan being adopted in 2016 and an application submitted in 2018, there is yet to be one home delivered on the site. Within Wymondham, all of the committed growth is on sites with extant permission, many of which have already been delivered and which only provide growth for the town through to 2026. As such, without directing further growth to Wymondham the GNLP will fail to plan for suitable growth in the town throughout the life of the Plan to 2038.

Q6 Can the market absorb the number of additional homes envisaged in and around Norwich City Centre? Is this supported by demonstrable evidence?

- 1.1.8 Gladman have serious doubts over the market's ability to absorb the level of housing that the GNLP is proposing to deliver within Norwich City Centre. Whilst Gladman support the identification of the city centre as a sustainable location for growth, we do not believe that sufficient evidence has been provided to the examination to demonstrate the strength of demand for city centre living in Norwich to justify the significant quantum of development that the GNLP is proposing.
- 1.1.9 The COVID-19 pandemic has altered demand for urban living with an emerging pattern of counter-urbanisation as more people look for larger properties with gardens. This trend is only likely to be further exacerbated as technology advances, increasing the ability for more people to work from home. A Savills Survey published in May 2020¹ demonstrated the increased demand for larger properties in rural locations with access to the countryside and private gardens. The Survey showed that 71% of younger (under 40) buyers, the group who were historically most likely to live in city centres, stated that a garden or outdoor space had become more of a pressing consideration when looking to purchase a new home.
- 1.1.10 The East Norwich Strategic Regeneration Area is expected to deliver 4,000 homes within the Plan period to 2038. In addition to significant deliverability concerns, Gladman also has concerns regarding the demand for such a significant quantum of development within this part of the city centre and the impact that this would have for the delivery of new homes across Greater Norwich, especially when considering that 30% of all the new allocations identified in the GNLP are at the East Norwich Strategic Regeneration Area.

¹ Savills - Covid-19 will reshape what prime UK home buyers and sellers want (May 2020) – online - <https://www.savills.co.uk/insight-and-opinion/savills-news/299736/covid-19-will-reshape-what-prime-uk-home-buyers-and-sellers-want>

Q8 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?

- 1.1.11 The Diss and district Neighbourhood Plan undertook consultation on the Regulation 14 version of the document during the summer of 2021, proposing to allocate a total of 494 dwellings. Removing existing Local Plan allocations, the neighbourhood plan is proposing to allocate 390 dwellings, comfortably in excess of the emerging Local Plan requirement.
- 1.1.12 It must be noted that strategic issues such as highways mean that the Local Plan is not proposing more significant growth to the main town of Diss. Gladman are supportive of neighbourhood planning and would not normally be concerned with decisions around housing development being deferred to the local community. However, sites being allocated in the neighbourhood plan are dispersed within the plan area and as Diss remains as the focus of service provision, will likely mean an increased number of trips by the private car in to Diss.
- 1.1.13 The strategy of the neighbourhood plan will therefore exacerbate highways issues already limiting growth to the settlement. In deferring decisions likely to have strategic consequences, the partnership need to be satisfied that housing can be delivered sustainably. Gladman is not currently confident that these sites can be delivered without causing highways issues. A more appropriate response may well be strategic intervention from the partnership in terms of highways, for example allocating a site that could contribute to mitigation measures, with allocations within the neighbourhood plan bolstering growth to the area, not being the sole focus.