

PROJECT TITLE: GREATER NORWICH LOCAL PLAN - EXAMINATION HEARINGS  
PROJECT REF: 5624  
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PREPARED BY: PW

## WOODS HARDWICK PLANNING HEARING STATEMENT IN RESPECT OF MATTER 15 - HOUSING PROVISION

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- 1.1 This Hearing Statement is prepared in respect of Woods Hardwick Planning Limited's appearance at the Greater Norwich Local Plan Examination Hearings on behalf of Gosford Ltd in respect of Matter 15 - Housing Provision.
- 1.2 We have also appeared at the Examination on behalf of Gosford Ltd in respect of Matter 2 - Housing Growth, Matter 3 - Issue 4 Village Clusters and Matter 3 - Issue 5 Small scale windfall housing.
- 1.3 We rely on our original Regulation 19 representations in answer to the main question: 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? As set out in our original representations, we consider that the plan is not sound on the basis that housing growth should be more evenly spread across the settlement hierarchy to reflect the percentage proportionate distribution of growth at Regulation 18 draft stage, whilst we would also question the inclusion of the windfall allowance within the total housing figure, in particular the estimated small scale windfall contribution from Policy 7.5. We understand from the hearing session for Matter 3 - Issue 5 that this policy is being further reviewed by the Partnership in light of the comments raised.
- 1.4 We seek to supplement our original Regulation 19 representations in answer to question 8 as below.

**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?**

- 1.5 We consider that there can be a high level of confidence in response to the first question above. Indeed, for the reasons set out in our original representations, we consider that the South Norfolk Village Clusters Plan can and should accommodate a higher level of housing growth over and above the minimum of 1200 currently allocated.
- 1.6 South Norfolk District Council is progressing with its Village Clusters Housing Allocations Plan. It published its Regulation 18 draft Plan for consultation between 7 June and 2 August 2021. The District Council's latest Local Development Scheme was published in May 2021. This indicates that the Council is aiming to publish its Regulation 19 Pre-Submission draft Local Plan in March 2022 with formal submission to the Secretary of State in June/July, examination hearings to start in November 2022 and with adoption expected in April 2023.
- 1.7 Evidence of the deliverability of a minimum of 1200 homes is set out in the Partnership's Response to the Inspectors' Initial Questions as updated 23 November 2021. The commentary at paragraphs 20 to 26 in response to Inspectors' Question 9 demonstrates the strength of response to the draft Village Clusters Local Plan and ability of the Local Plan to deliver on housing numbers.
- 1.8 As noted at paragraph 11 of the Partnership's Response to Question 8, Table 7 of the submission draft GNLP demonstrates that proportionately the level of growth in the clusters is 'notably smaller than the percentage of the population that currently lives in these locations; 9% of the

overall housing growth, compared to almost 25% of the current population'. As set out in our Regulation 19 representations in respect of Policy 1, Table 6 and Policies 7.1 to 7.4, we consider that the number of homes allocated to the village clusters should be increased to reflect the percentage proportionate distribution of housing allocations to the settlement hierarchy set out at the Regulation 18 Stage C consultation and also having regard to our representations that the homes to be delivered through Policy 7.5 should be excluded from the total housing supply figure. Effectively we argue that a minimum of 2,465 new homes should be allocated to the Village Clusters (Broadland 703, South Norfolk 1,762) if the numbers associated with the delivery of Policy 7.5 are excluded from the housing figure or a minimum of 2293 new homes (Broadland 653, South Norfolk 1,640) if the numbers associated with Policy 7.5 are included.

- 1.9 Even with the above proportionate distribution and associated uplift to the village clusters numbers, the number of homes proposed in the village clusters would still represent only approximately 10% of the total housing growth envisaged in the Local Plan. We consider that this level up uplift is reasonable and can readily be accommodated with the Village Clusters. As noted at paragraph 15 of the Partnership's Response to Inspectors' Question 8, the JCS strategy identifies 45 Service Villages and 33 Other Villages in South Norfolk whilst at paragraph 16 it is noted that there are over 60 smaller settlements in South Norfolk. Even excluding the smaller settlements, a distribution of 1,762 homes or alternatively 1,640 homes to South Norfolk as noted above would only result in an average of approximately 23 and 21 new homes respectively being allocated to each of the villages in South Norfolk (approximately 15 in the case of a minimum allocation of 1200).
- 1.10 We consider that this range of growth can readily be accommodated in the Village Clusters and will be important in enhancing and maintaining the vitality of rural areas as required by the NPPF, particularly in a District such as South Norfolk which includes a large rural area and significant number rural settlement.