



Greater Norwich Local Plan Examination Inspectors Matters, Issues and Questions (Part 2)

January 2022

MATTER 15 – HOUSING PROVISION

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?

Whilst the South Norfolk Village Clusters Plan has the potential to identify sufficient sites to accommodate this level of future residential development, it is highly uncertain that the timescales for the progression and Adoption of the Plan will enable the delivery of development by 2038.

The overall progression of the Village Clusters Plan is now behind schedule and yet to undergo formal Examination, further shortening the available period within which to deliver the required quantum of development.

We have also previously raised serious concerns regarding the lack of transparency or evidence-based assessment as to how the levels of growth proposed to be apportioned to each respective settlement cluster were made, together with the fact that in clusters where Neighbourhood Plans are currently being progressed, even where they are at very early stages, the South Norfolk Village Clusters Plan has nevertheless sought to 'defer' any allocations within these clusters to the subsequent Neighbourhood Plan. Clearly if the respective Neighbourhood Plan stalls, then so to does any proposed allocation for residential development which would otherwise derive from it.

Alongside this, the insistence that, for the most-part, proposed Allocations are restricted to within the 12 – 25 dwelling range places a further artificial and unnecessary constraint upon development coming forward within the Plan period.

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

Whilst the Diss and District Neighbourhood Plan has the potential to identify sufficient sites to accommodate this level of future residential development, it is highly uncertain that the timescales for the progression and Adoption of the Plan will enable the delivery of development by 2038.

Whilst the Plan currently proposes a total number of sites suitable to potentially accommodate in excess of 400 dwellings, it is noted that 200 of these dwellings are currently proposed upon a single site to the north of Diss, hence should this site not come forward, the Plan would be totally reliant upon all of the other identified sites being delivered over the Plan period.





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As indicated within previous Representations to both this Examination and the Diss and District Neighbourhood Plan, scope exists to provide additional allocations at Scole to provide the necessary flexibility within the Plan to address this current shortcoming.

<u>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?</u>

Whilst Paragraph 188 (f) of the Plan suggests that 12% of the homes allocated through the plan are on sites of no larger than 1 hectare, it is difficult to be able to verify this claim, as no discernible breakdown of how this figure has been derived is immediately apparent.

It does appear, however, that a significant proportion of these sites comprise existing brownfield sites within the Norwich urban area, where the principle of reuse for residential purposes would accord with existing Development Plan Policy in any event, without the need for positive identification and allocation.

In a similar vein to the comments made in respect of the Diss and District Neighbourhood Plan, it would therefore be wholly prudent to allocate additional sites within the Broadland and South Norfolk areas to provide the necessary flexibility within the Plan to address this potential shortcoming.