



GREATER NORWICH LOCAL PLAN EXAMINATION

Examination Hearing Statement for Matter 16

**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 16 – MONITORING

Is the Monitoring Framework set out in Appendix 3 of the Plan effective in delivering the policy requirements during the Plan period? In particular:

1. Are the proposed indicators and targets appropriate and measurable? Are they clearly time related such that they can be monitored during the Plan period rather than at the end of it? Are they clearly expressed as targets rather than objectives? Are any others necessary for monitoring to ensure soundness of the Plan?

2.1 Appendix 3 (p. 138 – 140) explains that:

"An essential part of the local plan is monitoring its implementation through the collection of relevant information. ..."

and:

"... The most valuable data source for how well the local plan is being implemented comes from planning application decisions. Other pertinent data about whether the local plan's overarching vision and objectives are being achieved comes from data collected by central Government and other public sector agencies."

2.2 As set out in Section 3 (p. 38) of the Plan, Appendix 3 notes the 'homes' objective:

"To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land."

2.3 With regard to total (i.e. all tenures) housing supply / delivery, it then sets out the following, sole, 'indicator':

Indicator Code	Theme	Indicator
GNLP32	Housing	The total number of new dwellings (all tenures) completed.

2.4 In short, the Plan contains no framework or indicators to monitor housing supply / delivery over the plan period.

- 2.5 With regard to the overall 'housing requirement', as we have discussed in relation to Matter 2 and Matter 15, the Partnership has clarified that the 'housing need' identified of 40,541 homes (equivalent to 2,028 homes per year) will be regarded as the 'housing requirement' and thus the basis for assessing housing delivery and housing land supply.
- 2.6 Appendix 6 confirms this, but goes further in stating (p. 144) that it is the 'residual annual target' of 1,961 homes per year that will be the 'target used to calculate the 5YHLS.
- 2.7 However, there is no basis in either national policy or guidance for this approach, which runs counter to the Government's "objective of significantly boosting the supply of homes". Such a 'residual' approach will not boost supply, but instead constrain it.

2. Does the monitoring framework clearly set out what actions will be taken if targets and policies are not being achieved?

- 2.8 As noted above in relation to Question 1, other than the potential allocation of the Costessey contingency site, and the delivery of the total housing requirement over the entirety of the plan period, the Plan contains no monitoring framework relating to the total (all tenures) supply / delivery of housing and thus does not set out any actions that will result if delivery falls short of that required during the plan period.

3. Is the Monitoring Framework effective in supporting the process of reviewing the Local Plan to assess whether it will need updating at least once every five years in accordance with paragraph 33 of the National Planning Policy Framework?

- 2.9 As noted above in relation to Questions 1 and 2, there is no monitoring framework relating to the total (all tenures) supply / delivery of housing during the plan period. As such, there is no framework to support reviews during the plan period.