

Representation to the Inspectors' Matters Issues and Questions (March 2023 Sessions) for the Greater Norwich Local Plan

Matter 15

On behalf of Barratt David Wilson Homes (Eastern Counties)

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Matter 15 Housing Provision

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?

In particular:

With regard to the September 2022 housing trajectory update (Document D3.2D Topic Paper) and housing forecast (Document D3.2E Topic Paper):

Q2 Taken as a whole, do any alterations to the site delivery assumptions significantly alter the overall housing land supply position?

Q4 Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?

- 1.1. In response to the delays already experienced by nutrient neutrality, the updated housing trajectory (D3.2E) (Part 1) indicates that the Partnership is due to deliver 2,118 homes per year. This represents a slight reduction, but remains broadly similar to the average of 2,182 per year achieved in the early years of the plan period. It is agreed that the outlined alternative approaches are less certain to ensure housing delivery throughout the plan period. Therefore, the approach to amending Policy 2 is supported.
- 1.2. The Partnership believes that, on the basis of current evidence, there would be a circa 6.05-year housing land supply as of 1 April 2023 on the adoption of the plan. Our client does not wish to specifically question this figure. Though they do suggest that it may be overly optimistic. Moreover, as it is predicated on housing delivery on allocated sites it is essential that the Partnership does not just rely on developers to deliver these sites. The Partnership will need to take a pragmatic approach to planning applications where the implementation of the credit system may cause further delays during their determination.
- 1.3. Maintaining a five-year supply will rely on allocations served by existing infrastructure coming forward early on in the plan period. If there is any delay in the release of credits for such sites then this will inevitably mean that a five-year supply cannot be maintained. Again, it is essential that the Partnership prioritises the release of credits to sites that are allocated and ones that are already delivering housing. Further resources may also be needed to ensure that applications for sites that are delivering housing are fast tracked through the planning system as best they can be.
- 1.4. Nutrient neutrality remains a significant constraint for developers in bringing forward new development in Greater Norwich, particularly from a viability perspective, with the additional costs associated with the mitigation credits. Alongside the uncertainty of the timescales for rolling out the credits, there are significant unknowns for developers. These ongoing issues are likely to mean that delays will continue in the short term, which is likely to impact on the five-year housing of deliverable housing land on the adoption of the Plan. The extent of any delays are for the Partnership to identify and manage.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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