

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

... continued

The housing commitments shown at the table under the Housing heading of Policy 1 should also be adjusted to exclude homes delivered through policy 7.5 and the windfall allowance and the 'New allocations' and 'Total minimum deliverable housing commitment' columns adjusted as follows:

Areas	New allocations	Total minimum deliverable housing commitment
Norwich Urban Area	6,696	32,715
Main Towns	1,913	7,064
Key service centres	777	3,761
Village Clusters		
Remaining parts of		
Broadland	735	
South Norfolk	A min of 1,836	5,109
Overall Total	11,957	48,649

These modifications would make the Plan sound by providing for an appropriate buffer of 20% on the housing need figure and by ensuring that only committed allocated sites are included within the total housing potential figure, thereby ensuring flexibility of sites within the market and the required certainty on housing delivery having regard to government guidance within the NPPF.

Meanwhile, our recommended distribution of housing allocations across the settlement hierarchy relates back to the percentage proportionate allocation at the Regulation 18C stage consultation draft Plan as assessed within the Sustainability Appraisal. A more even distribution of allocations across the settlement hierarchy in this way is more likely to address the objective of delivering homes. It provides for a wider dispersal of development across a large proportion of the settlements within Greater Norwich and would allow for additional growth in both towns and villages which would support existing local services and community facilities.

Notwithstanding the above, if it is determined on Examination that homes to be delivered through policy 7.5 and windfall allowance should contribute to the total housing potential figure, then based on the figures presented by the draft Plan, we consider that the distribution of homes noted in the Explanation column for D at Table 6 should read: 'These are homes to be provided on new sites

allocated through the GNLP (8,811), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,643) and the Diss and area Neighbourhood Plan (250).’

We further consider based on this assumption that the ‘New allocations’ and ‘Total minimum deliverable housing commitment’ columns at the table under the Housing heading of Policy 1 should be adjusted as follows:

Areas	New allocations	Total minimum deliverable housing commitment
Norwich Urban Area	5,994	32,013
Main Towns	1,713	6,864
Key service centres	696	3,680
Village Clusters		
Remaining parts of		
Broadland	658	
South Norfolk	A min of 1,643	4,839
Allocations Total	10,704	47,396
Homes delivered through policy 7.5		800
Windfall allowance		1,296
Overall Total		49,492

If it is determined that homes delivered through policy 7.5 and windfall allowance should contribute to the total housing figure, the above modifications would make the Plan sound for the reasons noted above. The approach would make for a more even distribution of allocations across the settlement hierarchy, which is more likely to address the objective of delivering homes. It would also provide for a wider dispersal of development across a large proportion of the settlements within Greater Norwich and would allow for additional growth in both towns and villages which would support existing local services and community facilities.

Having regard to the above comments, the respective figures relating to allocations across the settlement hierarchy at Policies 7.1 to 7.4 should be adjusted accordingly.