

## Greater Norwich Local Plan Pre-Submission Draft Strategy – Regulation 19 Publication Strategy Representations on behalf of Orbit Homes

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### Policy 1 – Growth Strategy

Policy 1 identifies the proposed housing requirement and spatial strategy for growth in the GNLP area between 2018-2038. Our representations on behalf of Orbit Homes focus on the proposed housing requirement and the distribution of growth to the Main Towns. Orbit Homes previously submitted representations to the Regulation 18 plan regarding the trigger for a Local Plan review not being in accordance with national policy and are pleased to see that this has been amended in the current draft strategy.

### Housing Requirement

Policy 1 proposes to set a housing requirement of **40,541 new dwellings** between 2018 and 2038 (**2,027 dpa**). This figure has been determined using the government's standard methodology and as such does not account for the clear need to set a higher requirement in Greater Norwich due to existing growth deal commitments.

NPPF paragraph 60 is clear that the standard method only determines the "*minimum number of homes needed*" (emphasis added) and Planning Practice Guidance (PPG, ID: 2a-002) states that the standard method "*identifies a minimum annual housing need figure. **It does not produce a housing requirement figure***" (emphasis added). The PPG (ID: 2a-010) goes on to provide advice on circumstances where setting a higher housing requirement (i.e. above that derived from the standard methodology) is appropriate, including situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area (e.g. Housing Deals); and
- strategic infrastructure improvements.

These points clearly apply in Greater Norwich with respect Greater Norwich City Deal and the ambitions of the Cambridge Norwich Tech Corridor:

- **The City Deal** was signed in December 2013 and in order to secure significant infrastructure funding totaling £440 million it commits the authorities to deliver a step change in housing delivery from an average 1,000 dwellings per annum (dpa) to 3,000 (dpa) for the 5 year period 2014-2019; and bring forward 3,000 additional homes by 2026 in the North East Growth Triangle (on top of the target of 37,000 set by the Joint Core Strategy for the whole plan area).
- **The Cambridge Norwich Tech Corridor (CNTC)** is an initiative that brings together private and public sector representatives (including Broadland and South Norfolk Councils) to achieve a vision of attracting 26,000 additional jobs and 46,000 new residents to the corridor before 2031.

Despite repeated references in the GNLP to the importance of achieving the vision set by the Cambridge

Norwich Tech Corridor and to meeting the City Deal growth requirements, it is clear that the currently proposed housing requirement pays no regard to these strategies. The table below analyses performance against the City Deal growth requirements since the start of the JCS plan period. It demonstrates that at no point between 2014-19 did the authorities deliver the average growth requirement of 3,000 dpa and due to this shortfall there is now a requirement to deliver 19,228 new dwellings by 2026 (or 3,205 dpa) in order to meet the City Deal requirement. The GNLP's current growth strategy fails to meet this growth requirement by nearly 4,000 dwellings due to the proposal to set a housing requirement of just 2,027 dpa and a subsequent under estimation of the number of short-term deliverable housing sites required to meet growth strategy ambitions.

*Table 1. Progress Towards Meeting City Deal Housing Commitment*

Year	Delivery - JCS Plan Period*	Forecast**
2008/09	1,736	
2009/10	1,237	
2010/11	1,168	
2011/12	1,182	
2012/13	1,214	
2013/14	1,241	
2014/15	1,681	
2015/16	1,728	
2016/17	2,251	
2017/18	2,034	
2018/19	2,936	
2019/20	2,304	
<b>Total delivered</b>	<b>20,712</b>	
<b>Additional Homes required to meet 40,000 home commitment to 2026</b>	<b>19,288</b>	
2020/21		1,987
2021/22		2,609
2022/23		3,349
2023/24		2,875
2024/25		2,615
2025/26		2,196
<b>Total forecast</b>		<b>15,631</b>
<b>Total delivered + forecast</b>		<b>36,343</b>
<b>Forecast shortfall against 40,000 home commitment at 2026</b>		<b>3,657</b>

\* Delivery data for 2008/09 – 2010/11 taken from Annual Monitoring Report 2010-2011

Delivery data for 2011/12 – 2017/18 taken from Annual Monitoring Report 2017-18

Delivery data for 2018/19 – 2019/20 taken from GNLP Appendix 6 Housing Trajectory

\*\* Forecast data for 2020/21 – 2025/26 taken from GNLP Appendix 6 Housing Trajectory

Further evidence of the need for additional housing to meet City Deal demand is contained in the Council's Strategic Housing Market Assessment (SHMA) published in April 2017. This document identifies that the jobs growth facilitated by the City Deal would likely result in a **demand for approximately 8,361 new homes above and beyond** those required as a result of general demographic change over the period until 2036. The standard methodology is purely based on demographic forecasts (with an uplift to address affordability) and this therefore indicates that the housing requirement for the GNLP should actually be **48,902 new dwellings** between 2018 and 2038 (**2,445 dpa**).

Orbit Homes recognises that the GNLP proposes to allocate sufficient sites to deliver **49,492 new homes by 2038**, which is 22% higher than the proposed housing requirement, but the plan makes clear that this should not be interpreted as the housing requirement. **In order to comply with national policy in the NPPF and PPG (and therefore pass the test of soundness at NPPF paragraph 35)**, we consider that it is necessary for the GNLP to set a higher housing requirement (in response to the City Deal) and not just an over allocation of homes to meet a lower requirement. Setting a housing requirement that accurately reflects the true housing need of the area is critical to ensure a strong monitoring position with respect to the delivery of housing (both as a trigger for reviewing the GNLP and for assessing 5 year housing land supply delivery).

We would also highlight our client's separate representations prepared by David Locke Associates (DLA) and Turley with respect to the proposed Silfield Garden Village. These representations set out the demographic evidence for a greater housing need than implied as a minimum by the standard method and forecast that housing need will increase during the plan period due to the scale of economic growth ambition.

**Recommendation:** Orbit Homes considers that the housing requirement proposed by the plan falls short of adequately reflecting the growth deal requirement by approximately 8,500 homes (as set out in the SHMA 2017). In which case the **housing requirement for the GNLP should be increased to approximately 49,000 dwellings**. We also concur, however, with the assessment put forward by DLA / Turley in our client's Silfield Garden Village representations that a new Housing and Economic Needs Assessment should be undertaken prior to the submission of the GNLP. The SHMA 2017 is now dated and urgently needs refreshing in order to inform the level of growth needed during the whole plan period.

It is also clear from the above table that the GNLP fails to allocate sufficient short term deliverable housing sites to meet the growth requirements to 2026. There is therefore a requirement to identify and **allocate additional sites that can be delivered within the next 6 years** to meet this shortfall.

## **Distribution of growth to the Main Towns**

Policy 1 proposes the following settlement hierarchy:

1. Norwich urban area (Norwich and Norwich Fringe)
2. Main towns (Aylsham, Diss, Harleston, Long Stratton and Wymondham)
3. Key service centres
4. Village clusters

It states that growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure through urban and rural regeneration, along with sustainable urban and village extensions. It focusses most of the housing, employment and infrastructure growth in the Strategic Growth Area (i.e. Norwich, the Tech Corridor and the Growth Triangle), but also allocates growth to other main towns and villages to support vibrant rural communities.

Orbit Homes is broadly supportive of the proposed settlement hierarchy, but has significant concerns regarding the appropriateness and sustainability of the proposed distribution of housing growth.

In Table 1 below, we provide a comparison of the distribution of existing and proposed growth to

different levels of the hierarchy. This demonstrates that, compared to existing commitments, the strategy for new allocations focusses a significantly higher proportion of growth to the village clusters (increased from 7% of existing commitments to 16% of new allocations), broadly similar levels of growth to the main towns (increased from 14%-15.5%) and key service centres (decreased from 8 to 6.5%) and a significant decrease in growth directed to the Norwich urban area (decreased from 71% to 62%).

Orbit Homes objects to this change of focus as it is clearly contrary to professed aims of the GNLP's Climate Change Statement to deliver growth in sustainable locations that reduce the need to travel. The allocation of an additional 1,682 dwellings in small villages is contrary to the principles of sustainable development. There has also been no assessment of the ability of village clusters in South Norfolk to sustainably accommodate the high level of growth proposed. **The strategy can therefore neither be considered justified (as it is not an appropriate strategy) nor effective (as there is no surety that the South Norfolk village clusters can sustainably accommodate the proposed growth) and it fails the tests of soundness set by NPPF paragraph 35.**

*Table 1. Settlement Hierarchy Distribution - Existing commitments and new allocations*

Area	Existing commitments		New allocations		Total Growth 2018-2038	
	No.	%	No.	%	No.	%
<b>Norwich urban area</b> (Norwich and Norwich Fringe settlements)	26,019	71%	6,672	62%	32,691	69%
<b>Main Towns</b> (Wymondham, Aylsham, Diss, Harleston and Long Stratton)	5,151	14%	1,655	15.5%	6,806	14%
<b>Key Service Centres</b> (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon, Poringland, Reepham and Wroxham)	2,984	8%	695	6.5%	3,679	8%
<b>Village Clusters</b> (Broadland and South Norfolk)	2,538	7%	1,682	16%	4,220	9%
<b>Total</b>	<b>36,692</b>	<b>100%</b>	<b>10,704</b>	<b>100%</b>	<b>47,396</b>	<b>100%</b>

**Recommendation:** To ensure a sustainable and deliverable distribution of development, Orbit Homes considers that a higher proportion of the housing requirement should be directed to the Main Towns that currently accommodate a relatively small proportion of proposed growth given their suitability for growth. As set in Orbit Homes' representations to Policy 7.2, the Main Towns are sustainable locations with deliverable housing options that could deliver a higher proportion of the growth needed in Greater Norwich, thereby avoiding unsustainable levels of growth in small villages.