

## **Greater Norwich Local Plan Reg 19 Draft Plan Consultation**

### **Land to the North and South of Norton Road, Loddon**

#### **Introduction**

These representations are submitted on behalf of our client Halsbury Homes Ltd in response to the Greater Norwich Local Plan (GNLP) Regulation 19 consultation.

Our client is promoting Land to the North and South of Norton Road, Loddon, for residential development through the GNLP and previously submitted Regulation 18 representations in March 2020.

Since the submission of Regulatory 18 representations, our client has carried out various technical assessments to demonstrate that the site is deliverable and free from technical constraints. This includes air quality, contamination, ecology, flood risk, heritage, minerals and transport assessments. These reports will be referred to (where relevant) during these Regulation 19 representations.

These representations will address the following two questions from the GNLP Regulation 19 form:

- **Question 5- Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**
- **Question 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.**

Our client considers that the Draft Local Plan in its current form is legally compliant, complies with the Duty to Cooperate and is legally sound. Nevertheless, certain Draft Strategy Policies (namely 1, 5 and 7.3) would benefit from amendments to provide greater certainty for delivery over the plan period (2018-2038). Therefore additional sites in sustainable locations, including Land to the north and south of Norton Road, Loddon are required.

## **Policy 1- the Sustainable Growth Strategy**

Policy 1 outlines the broad strategic approach for the plan period, which includes the proposed housing requirement and housing commitments.

### Housing requirement

Paragraph 65 of the NPPF requires that a housing requirement is established within a Local Plan, which shows the extent to which their identified housing need can be met over the plan period.

The foreword to the Draft Local Plan identifies a "requirement" for about 49,500 homes over the period 2018-38. Paragraph 177 and Table 6 of the GNLP however identify a housing "target" for only 40,541 homes and Policy 1 identifies a "need" for around 40,550 homes.

The GNLP is therefore not only ambiguous such that it may not be effective, it also does not accord with national policy and therefore would benefit from a set housing requirement in strategic policies.

*Recommended modification:* to provide consistent references throughout the Local Plan to the 'housing requirement' as per Paragraph 65 of the NPPF.

### The minimum housing need

The need for 40,541 homes is identified as having been calculated using the standard method. The standard method provides the minimum local housing need and is calculated using the average household growth for 10 consecutive years, with an affordability uplift based on the median workplace-based house price to earnings ratio of the preceding year<sup>1</sup>. The Draft Local Plan covers the period from 1st April 2018. In order to establish the minimum local housing need for the plan period it is therefore necessary to calculate either the standard method at 2018; or to calculate the current standard method and apply this to the remainder of the plan period in addition to the number of completions which have already occurred.

In the case of the Greater Norwich Plan Area, the average household growth over the 10 consecutive years from 2018, namely 2018-28, was 400 in Broadland, 510 in Norwich and 704 in South Norfolk. The median workplace-based house price to earnings ratios in 2017 were 9.82, 6.93 and 8.92 respectively. Using these figures, the minimum local housing need over the plan period equates to **41,388 homes**.

Alternatively, the minimum local housing need from 2020 onwards can be calculated using the average household growth over the 10 consecutive years from 2020, namely 2020-30, with

---

<sup>1</sup> As confirmed in paragraph 15 of the Housing Delivery Test Measurement Rule Book.

the affordability ratios of 2019 applied. The average household growth was 394, 505 and 680 respectively and the median workplace-based house price to earnings ratios were 9.01, 6.97 and 9.02 respectively. These figures produce a minimum local housing need of 2,008 homes per annum which equates to 36,148 homes over the period 2020-38. Table 6 of the GNLP identifies that 5,240 homes were completed in 2018-20. In addition to the minimum local housing need of 36,148 over the period 2020-38 this would again produce a minimum local housing need for **41,388 homes** over the plan period.

It is therefore apparent that the standard method has been miscalculated within the GNLP and that the minimum local housing need is greater at **41,388 homes**.

*Recommended modification:* In combination with the subsequent considerations, it will therefore be necessary to modify the emerging housing.

#### Historic under-delivery

In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 25,878 housing completions in the period 2008-20. However, only 20,924 homes have been delivered which demonstrates that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa 23.7%. The overestimations of supply can be mainly attributed to the delivery rates of strategic infrastructure projects, and consequently, the ability of large scale SUE's to be delivered across Greater Norwich. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement which is 25% in excess of the minimum need for 40,541 homes. This would produce a housing requirement for 50,676 homes. Our client welcomes the Council's decision to include a substantial buffer of over 20% between its housing requirement and housing supply. This is essential to ensure the plan has sufficient flexibility to meet needs in full across the plan period.

*Recommended modification:* It is, therefore, recommended that a proposed minimum contingency of 25% is retained as a minimum.

#### **POLICY 5 – HOMES**

Policy 5 of the GNLP Draft Strategy sets out a requirement of 33% affordable housing on sites of 10 or more units, even though the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifies that there was a need for 39,486 homes, of which 11,030 represents 28% affordable housing. The affordable requirement should be based on up to date evidence and should be subject to detailed viability testing at a range of scenarios. Therefore, this aspect of Policy 5 will need to be amended.

*Recommendation:* In order to address this, it will be necessary to either recalculate the affordable housing needs based on the planned supply and then set affordable housing policies accordingly, or to reduce the affordable housing requirement within Policy 5 to 28%.

### **POLICY 7.3 – KEY SERVICE CENTRES**

Paragraph 372 of the GNLP outlines that Key Service Centres have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving rural areas. It also identifies that these roles are intended to continue supported by appropriate levels of development.

The Draft GNLP Strategy states that the Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham, will deliver 3,679 homes over the plan period (approximately 7% of the proposed housing growth).

Loddon has one new proposed housing allocation in the Draft GNLP Strategy, which is to the south-east of the settlement (Policy GNLP0312, Land to the east of Beccles Road) for the development of over 180 homes. Land to the north and south of Norton Road would adjoin onto the northwestern boundary of 'Land to the east of Beccles Road' (GNLP0312) and lead to the natural extension of the sustainable settlement of Loddon. The GNLP Loddon and Chedgrave Site Assessment Booklet assesses submitted sites in these settlements for consideration in the GNLP. It states that our client's site is *"well related to services, is adjacent to a site which has been preferred for housing allocation, and offers the potential to increase permeability within this part of the town."* As a result, the site was shortlisted for further assessment (Stage 6). The Stage 6 Assessment centred on the impacts on highways, flood risk, landscape visual and local services, as further set out in the paragraphs below.

#### Highways Impact

The initial Highways Authority comments from the Booklet state that Norton Road is not suitable for development traffic, but the southern section of the site may be accessed via the adjacent allocation Land to the east of Beccles (GNLP0312). As outlined with our client's Regulation 18 representations, they agree that suitable accesses can not only be achieved via the neighbouring allocation but also onto Norton Road.

Since the submission of Regulatory 18 representations, our client has commissioned technical transport assessments to evaluate the feasibility of creating two T-junctions on either side of Norton road, to serve both the site's northern and southern sections. At present, a through route via Land to the east of Beccles is not possible as this is a draft allocation (GNLP0312) and does not benefit from an extant consent. Therefore, the Transport Assessment (TA) solely assessed the highway's impact on two proposed Norton Road accesses. The Transport

Assessment recommended that a new footway is included on both sides of Norton Road and an extension of the existing 30mph towards the east. The TA concluded that such a proposal should be considered acceptable on transport-related grounds. Therefore, contrary to the initial Highways Authority comments, this detailed TA has found that it could be feasible to create safe vehicular access onto Norton Road.

### Landscape Visual impact

Comments from Development Management raise concerns that the site would "*cause harm to the landscape and the rural setting of the Broads.*" However, no further details are provided. A Landscape and Visual Impact Assessment (LVIA) instructed by our client, states that the views of the Site are considered to be well contained and highly localised within the context of the existing visual environment. The assessment concludes that the Site and receiving environment have the capacity to accommodate a strategic residential scheme. The allocation will not result in significant harm to the landscape character or visual environment and, as such, it is considered that a strategic housing proposal can be successfully integrated in this location.

### Flood Risk impact

In terms of the other comments raised in the Loddon and Chedgrave Site Assessment Booklet, the Lead Local Flood Authority (LLFA) outlines that a complete geotechnical investigation will be needed to determine infiltration potential. Nevertheless, the LLFA outlines that "*the site is at risk of surface water flooding, but this is not severe enough to prevent development of the site*" and mitigation could be provided at the required planning *stage.*" This is further supported in a Flood Risk Assessment (FRA) prepared by our client. The FRA concludes that with appropriate mitigation measures, the risk of flooding from all sources is generally low, and a development proposal can be operated safely and without significantly increasing flood risk elsewhere.

### Sustainability

Land to the north and south of Norton Road is considered to be located in a sustainable location as it is easily accessible to Loddon's High Street (less than 10 minutes walk from the site), which has an excellent range of shops, services, employment opportunities and bus stops with a frequent bus service to Norwich city centre (one bus every 30 minutes). Furthermore, there are employment opportunities available at Loddon Industrial Estate (less than 10 minutes walk from the site). By affording sustainable levels of growth to areas such as this it will assist in safeguarding existing services, public transport links and infrastructure which local people currently rely upon and support vibrant rural communities.

However, the Loddon and Chedgrave Site Assessment Booklet states that if this site was allocated in addition to the two other allocations in Loddon & Chedgrave, "*development of this site may overwhelm public services.*" However, as previously stated in our clients' Regulatory 18 Representations, there is the potential to deliver new community facilities at Land off Norton Road, Loddon, for a range of uses, including public open space. Halsbury Homes Ltd will explore whether it may be possible to deliver additional facilities at the site. There is also the potential for off-site contributions to upgrade existing facilities. Halsbury Homes would welcome the opportunity to engage with the local community to understand what kind of facility will achieve the greatest benefit to the community.

### Other Issues

Other technical reports commissioned by our client found there would be no adverse effects (subject to suitable mitigations) on nearby heritage assets, air quality, amenity and noise and trees.

### Conclusion

The Loddon and Chedgrave Site Assessment Booklet concludes that the site is considered unsuitable for allocation. However, our client considers that the Councils should consider identifying additional available and deliverable small and medium sized sites from a range of locations capable of accommodating housing growth within the plan period. The site is available and deliverable within the plan period, with site access feasible to both the northern and southern sections of the site. The absence of additional allocations at Loddon is therefore not justified. The resultant disproportionately low level of growth will compromise the vitality of the settlement contrary to paragraph 78 of the NPPF

*Recommendation:* In order to provide greater certainty for the plan period, it will be necessary to increase the amount of housing in Key Service Centres, such as Loddon, which is capable of accommodating housing growth within the plan period. This provides the opportunity to allocate Land to the North and South of Norton Road, Loddon.