

22nd March 2021

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Dear Sir or Madam,

Re: Greater Norwich Local Plan Regulation 19 Pre Submission Draft Consultation.

I refer to the above document and the consultation upon its contents. Please accept this letter as our response on behalf of our client Land Allocation Ltd to the above consultation.

We wish to make representations upon housing numbers, the spatial strategy, and rural housing, particularly focusing on policies 1, 7 and 7.2. We also wish to comment upon the proposed allocations at Diss a Main Town within the settlement hierarchy.

Housing Numbers: Policy 1 The Sustainable Growth Strategy

Policy 1 identifies that to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes and sets the settlement hierarchy of Norwich urban area (Norwich and Norwich Fringe, Main towns, Key service centres and Village clusters).

It is centrally important to consider the Local Housing Need requirement in order for an appropriate and sustainable level of growth to be identified and provided for across the Great Norwich Area, delivering a sufficient amount of housing over the plan period. It is noted that this consultation includes a housing figure of 1,961 dwellings per annum, however, there is no real certainty within this Local Plan consultation in regards to the suitability of these figures. A key government objective is to 'significantly boost' housing supply, and it is felt a greater emphasis should be placed on the wording of the policy so that it is recognised as the minimum housing requirement.

Paragraph 60 of the NPPF states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

It is important to note that Paragraph 60 of the NPPF and the associated guidance within the PPG are clear that the standard method represents the “...minimum number of homes needed...” The plan must respond to the Government's key objective of boosting the supply of housing. It is important that there is flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period in order to meet the housing requirement. Therefore, the Council should be seeking to over-allocate housing land to ensure flexibility, choice and competition in the housing market reflecting government guidance.

Any Local Plan currently being prepared will also have to consider the effect of the coronavirus pandemic on the housebuilding industry, and subsequently, the deliverability of the Council's current five-year housing land supply. Whilst still relatively unknown, delays in the deliverability of housing are likely, and therefore, a subsequent undersupply may occur.

The Council have calculated the Local Housing Need, based upon the Standard Methodology resulting in 1,961 dwellings a year, but this calculation was carried out in June 2018. Further, the LHN, when calculated using the Standard Methodology, can fluctuate year to year based upon the housing projections, and the Standard Methodology doesn't take account of economic growth. We therefore, recommend a Housing Requirement between the aggregated Local Housing Need for the three authorities calculated by the Standard Methodology and a requirement that takes account of the economic growth that the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land.

Just as the Local Housing Need can fluctuate, so can the buffer that is required in the context of 5-year housing land supply. The District Council may decide to confirm their 5-year housing land supply, in which case a 10% buffer would apply, and the rate of deliverable may also fall over the plan period, in which case a 20% would apply. We consider that a 20% buffer would ensure that the plan is future-proofed and provide flexibility, choice and competition in the housing market, reflecting government guidance.

We consider that the Council should be targeting a higher housing requirement than the Local Housing Need calculated using the Standard Methodology. It is notable that the proposed requirement does not provide an uplift for economic growth, even though the draft Local Plan identifies 33,000 additional jobs and allocates 360

hectares of employment land. We support the Local Plans ambition with respect to economic growth and believe that a housing requirement uplift is necessary to support this.

In addition, the PPG identifies other factors which need to be considered when determining the housing requirement. These include growth strategies, planned infrastructure, previous levels of delivery and recent assessments of need such as Strategic Housing Market Assessments (SHMA) where this suggests a higher need (PPG ID 2a-010). The Plan must be aspirational but deliverable to be positively prepared (NPPF, paragraph 16), and the target of new homes per annum is insufficient to realise job-led housing need across the plan area. In order to be found sound, the Local Plan should be targeting higher growth within the Local Plan in accordance with the above explanation.

Housing Distribution: Policy 7 Strategy for areas of growth

Policies 7.1 to 7.5 provide details on the housing distribution. The Main Towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham provide just over 6,806 homes, approximately 14% of the proposed housing growth planned to 2038.

The GNLP identifies that the Main Towns *‘play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. As such, they are engines of rural growth and it is important that they are enabled to grow at appropriate scales, having regard to infrastructure and environmental issues, to enable them to thrive.’* Diss is identified as having *‘the widest range of shops and services of the main towns, as well as a broad range of employment opportunities mainly located to the east of the town centre close to the railway.’*

Policy 7.2 distributes the 6,208 new homes between the Main Towns. Given that Diss the Main Town that the GNLP identified as having the widest range of services, then it is counter-intuitive that other Main Towns have higher growth, for example, Aylsham and Harleston are allocated 550 and 555 new homes whereas Diss is allocated 400 new homes.

In order for sustainable growth to be delivered across the Area at the level that is required, the local plan strategy should encompass a need for development within rural areas. Whilst a larger proportion of housing and employment growth should be focused on the urban or improved infrastructure areas, growth should also be located within the areas that the GNLP identifies as playing a vital role in the rural economy.

By permitting development in such settlements, it would help to assist in maintaining the vitality of these rural areas. Further a mix of smaller and medium scale sites can be delivered at a faster rate than the larger, allocated sites. Such sites form an important contribution to the Council’s five-year housing land supply and should be

considered in order to allow the Councils to continuously maintain a healthy and constant supply of deliverable sites.

In combination with the growth dispersed to the larger settlements, development in rural areas would ensure that there was a level of housing growth across the areas where those houses are needed. It would promote housing and would also ensure that rural areas received appropriate growth levels to maintain and enhance economic vitality, and the services and facilities required would be maintained. This approach would take account of paragraph 78 of the Framework sufficiently to promote housing growth in the rural settlements of the District's. In such areas, more housing would assist in maintaining the vitality of rural areas, including the retention of services and facilities that depend on economic growth. Such an approach will promote greater and more sustainable developments.

Part 2: Allocations

To simply provide for the local housing need figure of 1,961 per year with an over-allocation of 22% would represent both a vulnerable overall strategy and would therefore be expressly contrary to the requirement to significantly boost the supply of housing embedded within the Framework. It would also lead to insufficient flexibility in the number of housing allocations to ensure that a five-year housing land supply can be maintained over the plan period to meet the housing requirement.

It is considered that this approach provides an overly vulnerable strategy, with little margin for error should there be even just a minor change in circumstances. It is therefore essential that the Council over-allocate housing land further to ensure flexibility, choice and competition in the housing market reflecting government guidance.

Policy 7.2 identifies that Diss as a Main Town and the preamble to the policy states that: *'the town has a strong local employment base and supports three main supermarkets, a wide range of local shops and services in the town centre, and a full range of facilities (including secondary school, GPs, leisure centre, library, a variety of sports clubs etc).'*

The GNLP provides for at least 400 new homes for the town of Diss, which consists of the allocation of Frontier Agriculture for 150 homes and the Diss & District Neighbourhood Plan fulfilling the remaining overall housing requirement. There are also three carried forward allocations and commitments this provides for Diss (including part of Roydon) 754 homes between 2018-2038.

Given the status of Diss and the Towns access to services, it is therefore difficult to comprehend the new allocation of only 150 dwellings in the GNLP with the future allocation of 250 dwellings in the Diss and District Area Neighbourhood Plan.

Policy GNLP0102 allocates land at Frontier Agriculture Ltd, Sandy Lane, Diss (3.61 ha) for residential development to accommodate approximately 150 homes. This site is located to the east of the railway, so noise mitigation will be required and is in an area historically characterised by employment premises, and the site is likely to be contaminated also. The preamble to the policy also states that *'the number of homes sought is set at 150 due to the highly sustainable town centre location, but the exact figure will be subject to detailed design and viability considerations.'* The site is unlikely to meet the definition of a deliverable site within the Framework.

Its allocation is even more difficult to comprehend when our clients site at land to the North of Walcot Rise, Diss is not constrained by such matters explained above. There is a willing landowner who has entered into a promotion agreement with our client Land Allocation Ltd who has submitted an outline planning application under reference 19/1555.

The Outline Planning Application was accompanied by substantial supporting documents such as Traffic Assessment, Heritage Impact Assessment, Flood Risk Assessment, Phase 1 Contamination Report, Landscape and Visual Impact Assessment and Ecological Surveys. None of which indicate that there are on-site issues that would prevent the sites allocation for residential development.

There are no significant abnormal or major infrastructure requirements. The Full Policy Requirements for Planning Obligations and CIL are expected to be made, as evidenced by the Outline Planning Application. There is no indication of any viability issues here.

The site forms a natural extension of the settlement, and there are no major constraints or viability matters to prejudice the development of the site for housing. There are no legal issues. The landowners are party to a promotion agreement with our client Land Allocation Ltd. Consequently, the site is deliverable, available and developable now.

Conclusion

We consider that the GNLP should be targeting a higher housing requirement than the Local Housing Need calculated using the Standard Methodology. It is notable that the proposed requirement does not provide an uplift for economic growth, even though the draft Local Plan identifies 33,000 additional jobs and allocates 360 hectares of employment land as a key priority for the Plan. We support the Local Plans ambition with respect to economic growth and believe that a housing requirement uplift is necessary to support this.

Just as the Local Housing Need can fluctuate, so can the buffer that is required in the context of 5-year housing land supply. District Councils may decide to confirm their 5-year housing land supply, in which case a 10% buffer would apply, and the rate of delivery on sites may also fall over the plan period, in which case a 20% buffer would apply. We consider that a 20% buffer above the uplift for economic growth would ensure that the plan is future-proofed and provide flexibility, choice and competition in the housing market reflecting government guidance.

As the Main Town that the GNLP identified as the Town with the widest range of services, the distribution of housing should reflect this by increasing the proportion of new homes to Diss. Overall, our clients site represents a deliverable, sustainable housing site and should be allocated in the emerging Local Plan for housing. Its inclusion within development limits and allocation will help to facilitate the future growth of Diss within the Greater Norwich area.

The site can deliver new housing within the short term and can make a significant and positive contribution towards addressing identified housing needs. The site adjoins the existing built-up and is seen in the context of the existing settlement. Through an appropriately designed scheme, an attractive residential development can be achieved, which will provide benefits to the local community as well as providing visual benefits.

If you need any further information or wish to discuss matters further, then please don't hesitate to contact me at this office. We trust that our representations will be taken account of in the future stages of the preparation of the Local Plan.

Yours Sincerely,

Joe O'Sullivan
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Head of Planning