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Working locally and nationally to
promote, protect and enhance a
beautiful and thriving countryside
for everyone's benefit.

Further Written Statement for GNLP Public Examination – CPRE Norfolk

Matter 2, Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?

Questions 1, 2, 3 and 5

Please refer to our written statement for Matter 1, Issue 2, as well as previously submitted documents including CPRE Norfolk's Reg. 19 consultation response.

Matter 2, Issue 2: Housing Growth

Q6 Is the identification of a supply buffer of 22% against the housing requirement justified?

It is clear that the supply buffer of 22% is not justified. The analysis in Topic Paper D3.1, Policy 1 Growth Strategy, and Topic Paper D3.2, Policy 1 Growth Strategy – Appendices reveals that there is no proper basis for including such a high buffer.

In fact, it is clear that the proposed 22% buffer is not actually a buffer, based on the Council's own justification for it in those Topic Papers. The Council itself describes it as entailing a 10% buffer and an entirely novel concept of a "flexibility allowance". Such an approach is entirely inconsistent with national policy and guidance:

- The NPPF at para. 74 indicates that a standard buffer is 5%, with 10% where the LPA needs to account for market fluctuations, or 20% where there has been "*significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply*". This section of the NPPF relates to the calculation of the Council's 5YLS: it is plainly relevant to the setting of the buffer as part of the housing requirement at the plan making stage.
- The PPG on Housing Supply and Delivery also suggests that a 10% buffer may be appropriate to "*account for potential fluctuations in the market over the year and ensure their 5 year land supply is sufficiently flexible and robust*" (para. 10). It states that where the Housing Delivery Test indicates that delivery has fallen below 85% of the requirement, a 20% buffer should be added instead.

There is no evidence presented by the Council in its evidence base of significant under-delivery, nor that the HDT reveals less than 85% of the requirement has been delivered. The PPG recognizes that a 10% buffer is justified to allow for flexibility. Adding a further "flexibility allowance" of 12% in effect means that the Council is applying the recommended buffer twice. That is plainly unjustified as there is nothing which suggests any particular reason for increased fluctuation or flexibility here.

Set out below is more detail on how this "flexibility allowance" was introduced in an entirely arbitrary manner.

The introduction of the "flexibility allowance" at Reg 19

The addition of a claimed total buffer of 22% consisting of a 10% buffer and 12% “additional flexibility” needs to be understood in the context of how the housing delivery target (at various stages of the plan’s formulation) was comprised. The table below illustrates the various contributions towards the housing delivery target for the GNLP.

	Reg 18A	Reg 18C	Govt 16.12.20	Reg 19	Reg 19 max
Plan Period	2017-2036	2018-2038	2018-2038	2018-2038	2018-2038
Local Housing Need	38,988	40,541	40,160	40,541	40,541
Delivery		2,938		5,240	5,240
Existing Commitment	35,665	33,565		31,452	31,452
<i>Shortfall</i>	<i>3,323</i>	<i>4,038</i>		<i>3,849</i>	<i>3,849</i>
<i>Costessey Contingency</i>					<i>800</i>
<i>SNVCHAP & Diss</i>				<i>[1,450]*</i>	<i>[1,450]*</i>
New Allocations	7,222	7,840		10,704	10,704
Policy 7.5				800	800
Windfalls				1,296	4,450
Target Housing Delivery	42,887	44,343	40,160	49,492	53,446
Buffer above GNLP need (40,541)				22.08%	31.83%
Buffer above Govt need – allocations (40,160)				18.02%	20.01%
Buffer above Govt need – all (40,160)				23.24%	33.08%

* Note the 1,200 for the SNVCHAP is stated as a *minimum* number

This shows that the final total number of new dwellings will exceed the target housing delivery figure if dwellings as a result of the SNVCHAP are greater than the minimum target of 1,200 over the plan period, the Costessey contingency of 800 dwellings is built-out, and a greater number of windfalls than have been included within the Plan’s housing target numbers are developed. Historic rates strongly suggest that the included number of 1,296 windfalls will be greatly exceeded, to a more likely total of 4,450 windfalls over the plan period. This means that the possible buffer could well exceed the published figure of 22%, with a potential buffer of c.32%-33%. Such a high buffer is grossly disproportionate and unnecessary.

Paragraph 89 of D3.1 explains how the housing numbers were arrived at following the Regulation 18B consultation and the publication of the “Towards a Strategy” document, with a housing need to 2036 of 37,200 homes and then applying a 10% delivery buffer due to “general uncertainty”, giving a plan requirement of 40,900 dwellings, although a larger buffer of 11% was actually advocated. The Draft Strategy referred to in Paragraph 98 of D3.1 includes further details of the Plan’s housing numbers (now extended to 2038), with the total being 44,343, including 7,849 new allocations, which consisted of 6,640 through the GNLP and 1,200 through the separate South Norfolk Village Clusters Housing Sites Allocation Plan.

Paragraphs 110 – 115 of D3.1 then go on to describe how the GNLP’s housing numbers increased further over time. Paragraph 110 states that “between the Regulation 18C and the Regulation 19 draft plans the key change to the growth strategy, and indeed to the plan as a whole, was that overall housing provision was increased by just over 5,000 homes with consequent changes to site allocations and the use of other sources of housing supply.”

Topic Paper D3.2, Policy 1 Growth Strategy – Appendices, is the key document which shows how the 22% buffer has been arrived at in an illogical and unsound way. On page 17 it states: “This results in a total plan provision of around 49,500 homes. Whilst it is not expected that all of these homes will be needed, the **10% delivery buffer** and **12% flexibility allowance** allow for higher household and economic growth “*should they be required*”. **In total, this adds up to the 22% buffer referred to in the Delivery Statement and Table 6 of the GNLP Strategy.**” It goes on to state that: “This approach is consistent with the government’s overall aim to increase the supply of housing and the NSPF agreement to at least meet LHN.”

This adding of a “flexibility allowance” to a buffer is therefore entirely based on speculation about household and economic growth, not evidence of what is actually needed. If it is not expected that all of these homes will be needed, they could all (or at least a number significantly above the housing need figure) be delivered, resulting in unneeded additional housing.

Whilst some additional growth may be justified to help facilitate the City Deal, other reasons for additional housing numbers do not exist, such as strategic infrastructure improvements which could drive an increase in local housing need, or the GNLP taking on an unmet need from neighbouring authorities as agreed in the statement of common ground, and especially do not justify this “double-counting” of having a buffer plus a flexibility allowance. The aspirational reasons given for higher housing numbers, consisting of a large buffer and a large “flexibility allowance” are largely to encourage economic growth, not to improve deliverability, and are therefore unsound.

The real reason for the inclusion of this disproportionate buffer appears to be perceived pressure from government at the time to substantially increase the supply of homes, as emphasised in their “Planning for the Future” white paper published in August 2020 (see paragraph 112, D3.1.)

However, there has been a clear change in government messaging since the change to a new Department for Levelling Up, Housing and Communities, with Michael Gove rethinking the earlier proposals. This change was summed up by the Prime Minister at the 2021 Conservative Party Conference when he said: “you can also see how much room there is to build the homes that young families need in this country. Not on green fields, not just jammed in the Southeast, but beautiful homes on Brownfield sites in places where homes make sense.”

Moreover, the proposed changes to the standard methodology which would have increased the annual housing requirement in Greater Norwich to over 3,000 homes a year have not been implemented, meaning that the uplift in the GNLP’s housing numbers is unjustified and unsound for this reason. However, the GNLP has maintained these higher figures, despite the lower 2014-based projections being required.

None of this is a sound reason for further increasing of the buffer contrary to the NPPF, which did not materially change since the Government’s White Paper proposals were not in fact carried through.

The ONS Household Projections

Worse still, reference (on page 17) is made to the now-discarded 2018 ONS-based household projections, rather than the relevant 2014 figures, which should be the figures used for the Plan to be compliant to national policy and guidance. For any inclusion of the higher figures, thorough analysis to demonstrate this need should have been carried out, rather than a vague assertion that higher growth may materialise, despite there being no requirement to accommodate such levels. Instead, by relying on the 2018 figures the GNLP is, in effect, double-counting when all that can be justified is an initial buffer and the 2014 figures. The size of this buffer is also disputed, in part due to the conclusions of the SA Addendum.

Finally, the suggestion that higher than needed housing numbers are needed due in part to the “uncertain long-term impacts of Brexit and the Covid-19 pandemic” (page 18, Topic Paper D3.2, Policy 1 Growth Strategy – Appendices) is not based on any real evidence and is speculative. It goes on to claim that: “Clearly, the GNLP housing provision can provide a significantly higher surplus of workers to support enhanced job growth” (page 18.) There is no methodological basis for this housing growth leading to jobs’ growth, and it is not the process which should be used.

The issue is aggravated by the fact that the way the housing targets have been set also include a third type of “flexibility” in addition to the buffer with additional flexibility referred to above, as it now includes a “contingency” site: see the draft Plan at (footnote 109). It is entirely unclear how or why there should be any justification for this contingency site being included, particularly given such a large buffer.

The intention to provide housing disproportionately beyond the housing need, is further shown by how the GNLP proposes to include approximately 9,000 houses above the figure indicated by the 2014 based household projections. 5,000 of these are due to using the 2018 household projections, with an additional 4,000. Question 12 of the Inspectors’ initial questions (Document D1.3) addresses this issue. The partnership’s response in paragraphs 41 – 43 shows how the GNLP is set to include inflated housing numbers without any policy justification for these. Rather than using the

Government's guidance to use the 2014 household growth figures, the partnership uses the 2018 figures to give higher housing numbers.

Conclusion

Throughout the various stages of consultation for the GNLP, an increasing number of parishes across Broadland and South Norfolk have supported CPRE Norfolk's call that existing commitments are built-out before additional sites for housing are allocated, as there are sufficient of these, along with windfalls, to meet the housing need. This has led to currently 72 parishes within the Plan area having signed a pledge supporting this position. This groundswell of opinion across the districts should be taken into account.

With the failure of the current Local Plan, the Joint Core Strategy, to deliver an overlarge housing target with 31,452 existing commitments being carried over to the GNLP, albeit for a plan which was due to run until 2026, we hope that this lesson would have been taken on board for the new Plan. However, it appears that the same mistake is set to be made again, with the GNLP setting over-ambitious, unrealistic, unnecessary and unneeded housing targets.

Given the need for sustainable development and with only the government guidance of meeting housing need, there is no strict need for any buffer. The SA Addendum supports the view that any buffer should be smaller than the various options including 20% in the original SA. To provide a reasonable amount of flexibility as is provided by a buffer as widely understood, CPRE Norfolk suggests that a buffer of between 1%-5% is more than sufficient, and if any larger would not be policy/guidance compliant, particularly as put forward in the draft GNLP, where a 10% buffer is added to with a "flexibility allowance" and potentially the further addition of more housing through the SNVCHAP providing more than the minimum number of dwellings, the Costessey contingency site being developed and in the likelihood of more windfalls being delivered than included in the GNLP's housing numbers.

Our view on how this can be made sound is to remove the 12% "flexibility allowance" and to reduce the 10% buffer to zero or to an absolute minimum, to ensure adherence to the concept of the sustainable location of housing and to combat climate change, as well as to reflect the current central Government direction of travel.

Question 7 Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?

Questions 8 and 9 of document D1.3 address parts of this issue. Here, we draw attention to the serious problem and, we contend, unsoundness of the separation of the SNVCHAP from the remainder of the GNLP. Paragraph 26 admits that if the SNVCHAP is not adopted/delivered then speculative planning applications would result due to the lack of an up-to-date Plan, although these are implied to be acceptable as they would help to ensure housing delivery targets would be met through an increase in windfalls. Unfortunately, the majority if not all of such planning applications would likely to be in less sustainable locations than those allocated through the GNLP's (and presumably the SNVCHAP's) site assessment process: the real possibility of this occurring makes this policy and its separation from, and different timetable to, the GNLP unsound.

To ensure soundness, the SNVCHAP needs to be brought into the same timetable as the GNLP, which would mean delaying adoption of the latter until the outstanding consultations for the former have been conducted.