

## Summary of issues raised by Cllr Waters for recording in minutes of GNDP meeting of 20<sup>th</sup> Nov 2017

### 1) Overall scale of Growth

The consultation document is based on a single number for Objectively Assessed Housing need (39,000) and for new allocations required (7,200) over the plan period. Whilst it is recognised that for purposes of consultation having a single number is simpler it is concerning that the numbers proposed are very much towards the lower end of a range which may reasonably be considered sound in the light of government guidance.

It is noted that the housing need figure has been reduced from the figure that was contained in the housing numbers paper endorsed by the GNDP on 23<sup>rd</sup> June. It is appreciated that the new figure is based on the proposed standard government methodology rather than local evidence provided in the Strategic Housing Market Assessment, but the proposed reduction in need is considered difficult to justify in the light of the standard methodology suggesting that the annual need for housing was 174 dwellings per year more than the SHMA suggested across Greater Norwich.

It is also noted that the housing allocations number was now calculated by including a 10% delivery buffer whereas the paper endorsed in June described 20% as one "considered to be a reasonable minimum buffer" and no explanation offered for this change of assumption.

Cllr Waters stressed that he was keen to see ambitious growth plans embodied in the new Local Plan as a failure to do this would increase the risk of the emerging plan being found unsound, compromise the ability of the GNGB to secure further government investment and potentially reduce the level of housing delivery in the overall plan area.

### 2) Distribution options and recognition of the role of Norwich

Owing to the very low level of new allocations needed compared to the level of sites already identified for development it was noted that the overall differences between the different options being consulted on was not huge.

Cllr Waters commented that whilst he had no problem with these matters being subject to consultation he had concerns over:

- The potential impact of a rural dispersal approach and how placing estate scale development in villages with no or few services would impact on the environment and service providers; and
- The danger that any new settlement proposed would attract scarce funds away from the existing strategic scale development that we should be trying harder.

He wanted to see a clear focus in the Plan on how it would address the growth needs of a vibrant and dynamic City. The Plan will need to appropriately delineate

the urban growth area from the wider rural hinterland as this is needed to: allow appropriate monitoring and attracting investment both through marketing to private sector and institutional investors; and by serving to allow different policies to be applied to different parts of the plan area.

The marketing case has recently been powerfully made in the recent GVA Hatch work which Norwich City Council will submit formally to the GNDP as part of its own consultation response and expect that due regard will be had to this in taking the plan forward.

### 3) Lack of detail proposed about delivery

The draft consultation document rightly acknowledges the importance of delivery in a number of places and the current activities of the GNGB. It goes on to ask a single question about delivery on page 16 – “do you support the broad strategic approach to delivering jobs, homes and infrastructure?”

However, the document doesn't really explore the options further in relation to delivery notwithstanding the fact that we are clearly failing to deliver against our current targets. For instance it doesn't ask about delivery plans being required for new allocations in the GNLP and there is no talk of an enhanced role for the GNGB in this regard. The absence of such material from the consultation document itself isn't regarded as problematic but the importance of the GNDP and GNGB taking a more active role in ensuring that strategic allocations can be delivered in a timely manner should be explored further in the coming months.

### 4) Time it has taken to produce and implications of detailed member involvement

It was noted that the timetable for the production of the GNLP had already slipped and that the discussions being held today should have been held in September. It is clear that in producing a joint local plan there is an issue with the three different local Councils having different ways of working and these need to evolve as the Local Plan is produced. However in order for it not to become a very adversarial and time consuming process it will be necessary for members to focus on strategic issues and allow the joint officer team to resolve matter of technical detail in future.

Norwich CC  
20<sup>th</sup> Nov 2017