

## Home Builders Federation

### Matter 4

#### GREATER NORWICH LOCAL PLAN EXAMINATION

##### Matter 4 Sustainable Communities and the environment

##### Issue 1 Is Policy 2 justified, effective and consistent with national policy?

Q16 Is the modification to Policy 2 suggested by the GNLP (in the Nutrient Neutrality Mitigation Statement of Common Ground with Natural England) justified, effective and consistent with national policy, the Written Ministerial Statement of 16 March 2022, and the evidence?

The HBF is supportive of the approach taken by the GNLP in response to the issue of nutrient neutrality. This has been positive and proactive in finding solutions that will allow development to proceed as soon as possible. In particular we would like to support the adoption of the lower occupancy rate being used within the nutrient budget calculator as this reflects local evidence as to occupancy rates rather than the national average that is used by Natural England. It is important to recognise that it is for the Council's as the Competent Authority to make this judgement and we would have expected Natural England to be supportive of the new occupancy rates given the evidence provided.

Q17 is the application of the Policy 2 as suggested to be modified in Q16 likely to affect the viability and deliverability of residential development in the plan area?

The evidence suggests that there will be an impact on the viability of development in the area with a number of typologies being made unviable by the potential costs arising from nutrient neutrality. In particular it would appear that the impact will be felt with regard to PDL sites in the urban area of Norwich. However, it must be remembered that the cost of mitigation are estimates and that the costs may be higher than anticipated. The costs examples used in the viability report for example are based on mitigation measures proposed in areas seeking to address the issue of nitrates and not phosphates. In general mitigation of nitrates does not require as much land with which to mitigate the impacts of new development compared to phosphates and as such the cost may be higher.

As such it will be important the there is a positive approach within the local plan when considering the ability of development to make the required contributions to, for



example, affordable housing. Policies must support decision makers and applicants to swiftly agree contributions on a site by site basis taking full account of the costs of nutrient mitigation relating to that site and its ability to deliver the homes needed across Greater Norwich.

*Q18 is the nutrient neutrality mitigation strategy likely to be successful in facilitating the delivery of the plan?*

The approach taken by the GNLPP is positive and given the current legislative framework sets out an approach that will facilitate the delivery of development in the Greater Norwich area. However, it will be necessary for Council to continue to work proactively with all partners to facilitate delivery and take a positive approach when considering the impact of this issue on development.

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