

Greater Norwich Local Plan Examination in Public (Part 1)

Matter 2, Issue 2

Statement on behalf of Halsbury Homes Ltd



MATTER 2 – VISION, OBJECTIVES AND THE SPATIAL STRATEGY

Issue 2 – Housing Growth

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

[prepared jointly with Lichfields]

- 1.1 A buffer in the order of 20+% is justified for the Greater Norwich Local Plan (“GNLP”) in the context of the Greater Norwich Development Partnership’s (“GNDP”) housing supply make up and the actual need for homes in the area.
- 1.2 The current supply includes a number of urban sites which are suitable, and the subject of well-intentioned development ambitions, but which are inherently unreliable in terms of delivery based on the current evidence. The GNDP has also made overly optimistic delivery assumptions against known average lead-in times and local delivery rates; without evidence to justify more optimistic assumptions. Accounting for both of these factors, our analysis – based on the GNDP evidence as it stands – suggests a significant risk that the GNDP housing trajectory will not deliver and thus not fully meet housing needs across the plan-period, especially from the middle of the plan period. A large buffer along the lines of that proposed by the GNDP is a sensible reflection, to some degree, of that risk, although our analysis suggests even that may not be enough to hedge against the shortfall of housing that will result if sites do not come forward to the ambitious assumptions assumed in the GNLP.
- 1.3 It is for this reason, plus potentially higher housing need, and the diminishing options for urban extensions in the Greater Norwich area (see A.2 Para 395), that it is essential for the plan to both solidify the position on the need for a new settlement(s) through an amended Policy 7.6 (see Matter 3, Issue 3); taking account of the need to adopt a longer term vision to provide early certainty to release such developments (PPG ID: 61-059).

Is the current identified supply buffer 22%?

- 1.4 As a starting point the GNDP’s 22% buffer is miscalculated. The 22% figure is based on the ‘Total Potential Supply’ (now 50,307 units, see ref. D3.2B) against the total local housing need (40,541). In this scenario, the GNDP assume the full delivery of two sites (Beeston Park and North Rackheath) within the plan-period, which is a wholly unrealistic scenario based on known lead-in times and local delivery rates. The buffer should therefore be calculated upon the ‘moderated supply’ figure (48,132 units, see ref. D3.2B): this equates to a 19% buffer.

Why is a buffer in the order of 20+% justified?

- 1.5 The reasoned justification for a 20+% buffer for this plan follows two strands: (1) Potentially higher housing need and (2) An uncertain housing supply.

1. Housing need

- 1.6 The Plan (Table 6, A.1) identifies local housing need for the three areas based on the standard method (as required by NPPF Para 61, with the methodology set out in the PPG section 'Housing and Economic Needs Assessments') as being 40,541 over the 2018-38 period (2,027 per annum).
- 1.7 The PPG is clear¹ that the standard method is a 'minimum' figure, and highlights that "there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates" (PPG ID 2a-010). Where such circumstances are applicable, Government is clear that it is "committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth" (PPG ID 2a-010); indeed Government is reliant upon many authorities delivering more than the minimum if the objective of delivering 300,000 homes per year is to be achieved².
- 1.8 Examples of scenarios where need may be higher than the standard method include – but are not limited to – where growth strategies or infrastructure improvements are in place, unmet housing need, previous housing delivery levels of previous [recent] assessments of need. In the case of Greater Norwich, at least two of these apply:

- 1 The most recent ONS Sub-National Population Projections (and Household Projections) suggest that, based on recent trends, household growth across Greater Norwich could be 11% higher than anticipated in the 2014-based projections (which underpin the standard method). As shown in Table 1, if housing need were assessed (using the standard method) on these projections, the need would be for 2,218 dwellings per annum. If this level of need manifested, this alone would reduce the buffer from 19% to 8.5%³; and

Table 1 Housing need for Greater Norwich using 2018-based Household Projections

	2014-based projections (2021-31)	2018-based projections (2021-31)	Difference	Standard method using 2018-based projections
Broadland	390	517	33%	664
Norwich	505	298	-41%	353
South Norfolk	670	922	38%	1,201
Total	1,565	1,737	11%	2,218

Source: Lichfields analysis, ONS/DLUHC

- 2 Recent delivery levels show (Table 2) that in the five-years to the pandemic (i.e. to 2019/20) the area has delivered 2,392 dwellings per annum on average – this is 18%

¹ The PPG section on 'Housing and Economic Needs Assessment' uses the word 'minimum' 27 times in the context of the standard method, and the NPPF Para 61 similarly 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..." (*emphasis added*)

² This is because the standard method, as calculated in December 2021, yields a figure nationally of 289,000 homes per year. Therefore, in order to reach 300,000 homes per year, authorities collectively need to fine 11,000 extra homes per year above the minimum standard method. In reality, the figure is likely to need to be higher, because this 289,000 includes c.85,000 homes in London which will certainly not be delivered (see London Plan Panel Report).

³ Based on the 'moderated' supply figure

more than standard method yields and suggests the area is capable of sustaining housing growth above the standard method. In line with the PPG this is yet another reason to suggest 'actual' housing need is higher than the standard method (and thus the 'actual' buffer between 'need' and 'requirement' is far less than that claimed in the GNDP).

Table 2 Recent Housing Delivery

	2015/16	2016/17	2017/18	2018/19	2019/20	Average (5 Years)
Combined Delivery	2,059	2,513	2,093	2,912	2,384	2,392

Source: Housing Delivery Test (2018, 2019, & 2020)

- 1.9 The Government has indicated it will be reviewing the Standard Method for local housing need, but what this would mean specifically for GNLP area is not known; however, based on the above indicators there is every reason to believe – and the GNLP would be consistent with policy and guidance – in considering that actual housing need is higher than the minimum standard method figure, such that, in the event that if housing supply did exceed the proposed housing requirement figure, there would be a demand and housing need to accommodate it.

2. Housing supply

Is GNDP's identified housing supply realistic?

Assessing past delivery

- 1.10 Using the GNDP's latest five year land supply assessment we have analysed the delivery rates of sites of over 100 units currently under construction, shown overleaf in Table 3. Lichfields analysis in Start to Finish (Second Edition)⁴ ("S2F") provides a detailed review of large-scale housing sites nationally, and shows the average annual build-out rate by site size. This shows:
- 1 For sites of 1,000-1,499 units, the average build-out rate nationally is 107 dpa, which compares with 81 dpa for comparably-sized sites in Greater Norwich (see Table 3);
and
 - 2 For site of 100-499 units, the average build-out rate is 55 dpa. This compares with 43 dpa for sites of a comparable size in Greater Norwich.

⁴ Available [here](#). See Figure 7 for build-out rate by size of site. Start to Finish was described as "credible research" by Inspector Roger Clews in his report examining the North Essex Local Plan.

Table 3 Analysis of delivery rates of sites currently under construction (100+ units)

Site					Past delivery							
Location	Name	Developer	Outlets	Total units	2015/16	2016/17	2017/18	2018/19	2019/20	Total	Annual Average	Average per outlet
Broadland	Royal Norwich Golf Club	Persimmon	1	1,000					25	25	25	25
	Blue Boar Lane, Sprowston	Persimmon, Hopkins Homes and TW	3	1,233	39	198	198	243	180	858	172**	57
Norwich	Three Score, Bowthorpe	Norwich City Council	1	1,000				61	18	79	40	40
South Norfolk	West of Lodge Farm, Costessey	Taylor Wimpey	1	509	25	82	75	48	44	274	55	55
	North Village, Hethersett*	Taylor Wimpey and Persimmon	2	1,196		33	95	124	92	344	86	43
	Heath Farm, Poringland	BDW	1	270	3	76	65	44	38	226	45	45
	South of Stoke Road, Poringland	Norfolk Homes	1	232	9	41	26	13	15	104	21	21
	North of Shotesham Road, Poringland	Norfolk Homes	1	221	13	27	36			76	25	25
	South, Silfield Road, Wymondham	Taylor Wimpey	1	250		8	32	58	50	148	37	37
	Carpenters Barn, Wymondham	Persimmon	1	250		77	91	58	70	296	74	74
	South, Rightup Lane, Wymondham	Hopkins Homes	1	153			4	46	40	90	30	30
	Spinks Lane/Norwich Road, Wymondham	Persimmon	1	259		33	59	75	76	243	61	61
Overall average										56	43	56
Sites 1,000+ units										81	41	81
Sites 100-500 units										43	43	43

Source: Analysis of Greater Norwich Five Year Land Supply Position 2019/20. *Delivery figures reported in FYLS Position for this site appear to contain a typo - delivery figures for Phase A1-B appear cited in text as all 62 complete, but table only shows 3 in 2018/19 and 3 in 2019/20 – assumed to be 31 each. **Average delivery for the 4 full years of delivery is 205 dpa.

- 1.11 This analysis provides clear evidence that build out on sites in Greater Norwich occurs at a lower rate than the national average; by at least 20%. This is because the build-out rates from S2F include both greenfield and brownfield sites, with greenfield sites delivering 34% more dwellings each year than brownfield sites. However, the examples from Greater Norwich are all greenfield sites, so represent the highest delivery rates the area is likely to see. On the basis that S2F shows greenfield sites delivering 34% more homes per year than brownfield sites, it would be reasonable to assume that a brownfield site in Greater Norwich of 1,000-1,499 units could deliver around 60 dpa and a brownfield site of 100-499 units could deliver around 30 dpa.

Table 4 Assumed delivery rates in Greater Norwich

Site size	Greenfield	Brownfield
100-500	40	30
500-1000*	60*	45*
1000-1500	80	60

Source: Lichfields Analysis *mid-point taken for this site size given a lack of local data.

Trajectory Review

- 1.12 We have undertaken a review of the current GNDP trajectory and the specific sites included (ref. D3.2C) with much of the GNDP evidence split across SoCGs, topic papers, and background evidence. From this review, we conclude that for some of the sites there is insufficient justification to claim that they have a realistic prospect of delivery, and for other others there is insufficient justification for the delivery rates claimed in the trajectory. This highlights the high level of risk in the GNL P trajectory. To illustrate the impact on delivery, we have made adjustments to the trajectory based on our analysis of the sites, drawing on the GNDP evidence (where it exists), and our own assessment, based on known factors affecting specific sites or typologies.
- 1.13 There are two principal categories of sites where we have amended the delivery on the basis of the evidence currently available:
- 1 **New allocations:**
We have reviewed the new allocations and have found examples where overly optimistic delivery rates and build rates have been adopted without justification.
 - 2 **Rolled forward allocations:**
A significant proportion of the GNDP’s supply (c. 19,585 units) is from rolled forward allocations. These include some sites that were allocated and now either have an extant planning permission or are delivering; but in many cases these sites have no planning permission. This total figure does not include new allocations that – at least in part – include some land that was previously allocated (i.e. East Norwich Strategic Regeneration Area – GNL P0360/3053).

For many of these rolled forward allocations, there does not appear to have been a robust assessment of whether there is a realistic prospect of delivery to match that required for a site (or its assumed rate of build out) to be considered developable. The HELAA (2017) (ref. B11.1) stated that given these sites were – at that time – recently adopted allocations they would not be reassessed (Para 3.4). That may have been a reasonable approach in 2017 but these sites were not assessed in later updates to the HELAA and it is now 2022. Some sites do have recently signed SoCGs with relevant landowners/developers and the GNDP has prepared document D1.3A (at the Inspectors request); but again, some of the assumptions made are not based on sound evidence. Moreover, some of the SoCGs confirm the very low prospects of delivery in the plan-period, contrary to the assumptions in the plan. The trajectory for many of these sites also include overly optimistic lead-in times and/or delivery rates.

- 1.14 Table 5 below sets out what Lichfields considers to be a more likely trajectory, based on the evidence supporting the plan. In essence, this represents the 'overall risk assessment' of the trajectory required by PPG (ID:3-024). This uses lead-in times based on Lichfields 'Start to Finish (Second Edition)' and the local build rates (see Table 4). The purpose of the risk assessment is to show that based on the evidence available, and taking into account challenges typical for different site typologies there is considerable doubt over a significant proportion of the overall supply. It may be that the GNDP prepare additional evidence to justify its supply, but as it stands, this is the position we come too taking a prudent approach.
- 1.15 For brevity, in Table 5 we have categorised the site amends building on our analysis above. Should the Inspectors wish a fuller analysis of each site we can provide this but as an aid, we have included a table of our brief reasons for each site amend (see Table 7).

Table 5 Lichfields Amended Trajectory

LPA: Broadland																								
Site Name	Site Ref	Net Homes	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)	Diff to GNDP	Conclusion
Land between Fir Covert Road and Reepham Road	GNLPO337	1,450							0	0	0	0	80	80	80	80	80	80	80	80	490	640	-810	New allocations: optimistic lead-in & rates not justified
White House Farm, off Blue Boar Lane/Salhouse Road	GNLPO132	1,200							0	0	0	0	80	80	80	80	80	80	80	80	560	640	-560	New allocations: optimistic lead-in & rates not justified
Beeston Park	20121516 S8/1	3,250			0	0	0	0	0	0	13	80	80	80	80	80	80	80	80	80	2,517	733	-1,517	Rolled forward: optimistic lead-in & rates not justified
North Rackheath	GT16	3,000						10	40	40	40	40	120	120	120	120	100	80	80	80	2,010	990	-1,135	
Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew	20090886 GT6	600									40	40	40	40	40	40	40	40	40	40	200	400	-200	
Norwich RFU	GT13	250								0	0	0	0	0							0	0	-250	
Land to the south of Burgh Road & West of A140	GNLPO311 / GNLPO595 / GNLPO2060	250					0	0	40	40	40	40	40	40	10							250	0	New allocations: optimistic lead-in & rates not justified
Total from above sites		10,000	0	0	0	0	0	10	80	80	133	200	440	440	410	400	380	360	360	360	5,777	3,653	-4,472	
Amended Trajectory																								
	Net Homes	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)			
GNDP	18,064	589	880	1,148	1,291	1,220	1,153	1,378	1,300	1,317	1,282	1,208	1,049	1,036	798	726	736	544	409	2,145	18,064			
Lichfields	18,064	589	880	1,123	1,166	1,020	913	1,008	611	608	690	856	717	708	640	558	548	513	444	5,777	13,592			
Difference	0	0	0	-25	-125	-200	-240	-370	-689	-709	-592	-352	-332	-328	-158	-168	-188	-31	35	3,632	-4,472			

LPA: Norwich																								
Site Name	Site Ref	Net Homes	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)	Diff to GNDP	Conclusion
East Norwich Strategic Regeneration Area	GNLPO360/3053/R10	4,000					0	0	0	0	0	0	60	60	60	60	60	60	60	60	3,580	420	-3,580	New allocations: optimistic lead-in & rates not justified
Anglia Square	GNLPO506 08/00974/F 18/00330/F	800							60	60	60	60	60	60	60	60	60	60	60	60	80	720	-80	New allocations: optimistic lead-in & rates not justified
Ber Street 147-153 (allocation)	CC2	20										0										0	-20	Rolled forward: Unreliable site (not evidenced as developable)
Ber Street, 10-14 (allocation)	CC3	10				0																0	-10	
Bethel Street, land to rear of City Hall (allocation)	CC24	20										0										0	-20	

LPA: South Norfolk																								
Site Name	Site Ref	Net Homes	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)	Diff to GNDP	Conclusion
LNGS1 AAP Allocation	LNGS1 (part)	1,200							40	40	40	40	40	40	40	40	40	40	40	40	720	480	-720	Rolled forward: optimistic lead-in & rates not justified
	LNGS1 (part)	600				0	30	30	40	40	40	40	40	40	40	40	40	40	40	40	60	540	-30	
Briar Farm, Mendham Lane	GMLP2136	405				0	0	0	40	40	40	40	40	40	40	40	40	40	5			405	0	New allocations: optimistic lead-in & rates not justified
Frontier Agriculture Ltd, Sandy Lane	GMLP0102	150						0	0	40	40	40	30									150	0	
South of Spirketts Lane	GMLP2108	150				0	0	0	0	40	40	40	30									150	0	
Total from above sites			0	0	0	0	30	30	120	200	200	200	180	120	120	120	120	120	85	80	780	1,725	-750	
Amended Trajectory																								
	Net Homes	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)			
GNDP		761	1,216	1,251	1,340	1,106	855	982	613	695	558	428	395	315	265	215	115	90	40	115	11,240			
Lichfields		761	1216	1251	1220	991	665	822	608	725	568	418	325	245	195	195	120	85	80	865	10,490			
Difference		0	0	0	-120	-115	-190	-160	-5	30	10	-10	-70	-70	-70	-20	5	-5	40	750	-750			

Summary Trajectory																								
	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38+	Total (in PP)		
GNDP Position																								
Previous Delivery*	2,936	2,304																				5,240		
Broadland			589	880	1,148	1,291	1,220	1,153	1,378	1,300	1,317	1,282	1,208	1,049	1,036	798	726	736	544	409	2,145	18,064		
Norwich			528	458	1,044	386	475	556	689	470	718	852	679	750	380	600	350	450	425	482	0	10,292		
South Norfolk			761	1,216	1,251	1,340	1,106	855	982	613	695	558	428	395	315	265	215	115	90	40	115	11,240		
Greater Norwich Forecast			1,878*	2,554	3,443	3,017	2,801	2,564	3,049	2,383	2,730	2,692	2,315	2,194	1,731	1,663	1,291	1,301	1,059	931	2,260	39,596		
South Norfolk Village Clusters Plan							40	60	100	100	100	100	100	100	100	100	100	100	60	40	~	1,200		
Policy 7.5						54	54	54	54	54	54	54	54	54	54	54	54	54	54	44	~	800		
Windfall Allowance								100	100	100	100	100	100	100	100	100	100	100	100	96	~	1,296		
Total Supply (Moderated)	2,936	2,304	1,878	2,554	3,443	3,071	2,895	2,778	3,303	2,637	2,984	2,946	2,569	2,448	1,985	1,917	1,545	1,555	1,273	1,111	2,260	48,132		
Lichfields Position																								
Previous Delivery*	2,936	2,304																				5,240		
Broadland			589	880	1,123	1,166	1,020	913	1008	611	608	690	856	717	708	640	558	548	513	444	5,777	13,592		
Norwich			528	443	990	334	275	385	484	265	284	268	241	311	295	195	124	120	120	120	3,660	5,782		
South Norfolk			761	1,216	1,251	1,220	991	665	822	608	725	568	418	325	245	195	195	120	85	80	865	10,490		
Greater Norwich Forecast			1,878*	2,539	3,364	2,720	2,286	1,963	2,314	1,484	1,617	1,526	1,515	1,353	1,248	1,030	877	788	718	644	10,302	29,864		
South Norfolk Village Clusters Plan							40	60	100	100	100	100	100	100	100	100	100	100	60	40	~	1,200		
Policy 7.5						54	54	54	54	54	54	54	54	54	54	54	54	54	54	44	~	800		
Windfall Allowance								100	100	100	100	100	100	100	100	100	100	100	100	96	~	1,296		
Total Supply (Lichfields)	2,936	2,304	1,878	2,539	3,364	2,774	2,380	2,177	2,568	1,738	1,871	1,780	1,769	1,607	1,502	1,284	1,131	1,042	932	824	10,302	38,400		
Difference to GNDP	0	0	0	-15	-79	-297	-515	-601	-735	-899	-1,113	-1,166	-800	-841	-483	-633	-414	-513	-341	-287	8,042	-9,732		
Local Housing Need (per annum)																								
Local Housing Need (per annum)	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	2,027	~	40,541	
Surplus / Shortfall	909	277	-149	512	1,337	747	353	150	541	-289	-156	-247	-258	-420	-525	-743	-896	-985	-1,095	-1,203	~	-2,141		
Cumulative																								
Cumulative Lichfields Delivery	2,936	5,240	7,118	9,657	13,021	15,795	18,175	20,352	22,920	24,658	26,529	28,309	30,078	31,685	33,187	34,471	35,602	36,644	37,576	38,400	~	~		
Cumulative Local Housing Need	2,027	4,054	6,081	8,108	10,135	12,162	14,189	16,216	18,243	20,271	22,298	24,325	26,352	28,379	30,406	32,433	34,460	36,487	38,514	40,541	~	~		
Cumulative Surplus / Shortfall	909	1,186	1,037	1,549	2,886	3,633	3,986	4,136	4,677	4,388	4,231	3,984	3,726	3,306	2,781	2,038	1,142	157	-938	-2,141	~	~		

Source: Lichfields Analysis, Document D3-2C

Note: Red inputs denoted where amends have been made either to the timing of delivery or the number of units delivered. *

***Clarification required:** There is a discrepancy between the completion figures in the annual monitoring reports, the housing delivery test (including the latest 2021 measurement), and document D3-2B for the years 2018/19, 2019/20, and 2020/21. The delivery figures need clarifying.

Summary of Lichfields' amended supply

1.16 Based on our risk assessment, and the associated adjustments to the trajectory, we present what we consider to be a prudent scenario where – based on the evidence as it stands – 9,732 units are at significant risk of not being delivered within the current plan period. In this scenario, the local housing need would not be met across the plan-period and the buffer completely eroded.

Table 6 Supply Position Summary

	GNDP Position	Lichfields Position
Previous Delivery*	5,240	5,240
Supply (Specific sites)	39,596	29,864 (-9,732)
S Norfolk Village Clusters Plan	1,200	1,200
Policy 7.5 Allowance	800	800
Windfall Allowance	1,296	1,296
Total Supply	48,132	38,400
Housing Requirement	40,541	40,541
Surplus / Shortfall	7,591	-2,141
Buffer %	+19%	-5%

Source: Document D3-2B & D3-2C, Lichfields Analysis

***Note** – There is a discrepancy between the completion figures in the annual monitoring reports, the housing delivery test (including the latest 2021 measurement), and document D3-2B for the years 2018/19, 2019/20, and 2020/21. The delivery figures need clarifying.

1.17 Expanding on our above analysis:

- Urban sites in Norwich:** A significant proportion of our risk adjusted supply amendments (in terms of the number of sites and number and units) relate to brownfield regeneration sites in the Norwich urban area that are rolled forward allocations. More widely, the demand for flatted homes in Norwich is weaker compared to other forms of housing (see Matter 3, Issue 1 for additional detail on this point). As a result, many sites in Norwich simply have not come forward for development in the past and no progress has been made since their original allocation. There may also be viability issues with these sites.

We are not suggesting that these sites should be deleted as allocations. They may well be suitable sites and would deliver urban regeneration benefits on previously developed land. However, these **are** sites where there is not the evidence available to suggest they have a realistic prospect of delivery at the point in time envisaged. The delivery from these sites should therefore not be relied upon in the trajectory, instead representing opportunity sites that could deliver in the plan-period; providing certainty to developers on their ability to bring forward applications. Their inclusion in the trajectory is what necessitates the significant buffer.

- **Contingency supply:** The GNDP has also identified an 800 unit 'contingency' location for growth at Costessey should it be required (Section 4 Delivery Statement, A1) (allocation ref. GNL2043/0581). From our analysis, its delivery would not be sufficient to make up the potential shortfall that may arise, based on our risk assessment. Moreover, it may only be triggered for release around 2030 based on our trajectory (based on the triggers set out in document D1.4A). With a circa five-year lead-in time (see Figure 4, S2F), this site could not contribute any supply until the very latter years; unable to meaningfully rectify any shortfall.

Why is a buffer in the order of 20+% reasonable when considering the other reasonable alternatives?

- 1.18 We note the conclusions of the latest SA Addendum (D1.6) with regards to newly tested reasonable alternatives in respect of the housing buffer (prepared at the request of the Inspectors; D1.1). However, the SA Addendum (D1.6) in its analysis appears to assume that in all the housing scenarios, the number of homes delivered represents the total supply, including the buffer, and that housing need is met. This is to misunderstand the purpose of the buffer, which is, at least in part, to provide sufficient flexibility to cover for non-delivery in the event sites (particularly those with higher risk delivery assumptions) do not come forward, and to ensure the plan addresses housing needs (NPPF Para 15).
- 1.19 On our assessment of the GNDP supply, a 1% or 10% buffer (as tested in D1.6) would not be sufficient to ensure the local housing need in the Greater Norwich area if our risk assessment turns out to be the realistic trajectory scenario. If one assumed that large elements of the supply did not materialise on the ground, this would of course mean that they would not generate environmental impacts. In addition, if all that housing potential was realised – contrary to our risk assessment – then – as shown in this statement – there is evidence that actual housing needs in the Greater Norwich Area will absorb that supply (acknowledging in any event the Government's own objective to significantly boost the supply of homes nationally, NPPF Para 60).
- 1.20 Respectfully, we therefore conclude the scoring of these additional buffer scenarios is not robust as it misunderstands the purpose of the buffer and what the implications would be on the ground.

Conclusions

- 1.21 To conclude, a supply buffer in the order of 20% is justified given the housing need and supply position of the Greater Norwich Area. While there may be a large pool of sites, there has been an inherent optimism bias in preparing the trajectory in respect of lead-in times, delivery rates, and site developability. These together lead us to conclude there is sufficient uncertainty to justify the buffer that has been adopted in this plan, even with some of the highest risk sites removed from the supply. Lower levels of buffer would fail to deliver the number of homes needed in Greater Norwich over the plan-period.

1.22 Taking the evidence as it stands, a supply gap may begin to occur as early as 2027/28. As the Local Plan (A.2) identified, the sustainable options for settlement extensions are diminishing and therefore a new settlement(s) may be needed (Para 395). Our supply analysis demonstrates that this route to achieving new housing therefore needs to be solidified now through an amended Policy 7.6 (see Matter 3, Issue 3) to ensure it can deliver in this plan period and shore up the supply position.

Table 7 Lichfields Justification for Site Amends

Site Name	Site Ref.	No. Units (Total)	Lichfields Commentary
LPA: Broadland			
Land between Fir Covert Road and Reephams Road	GNLPO337	1,450	Lead-in times and rates amended. Assumed 7-year lead-in assuming application is submitted in 22/23 (i.e. the year the joint plan may be adopted). Not sufficient evidence to demonstrate why higher rates would be achieved or shorter lead-in times achievable. <i>Site pushed back. Rates amended. Lack of evidence to justify proposed delivery.</i>
White House Farm, off Blue Boar Lane/Salhouse Road	GNLPO132	1,200	No SoCG and no planning application has been made. Assumed 7-year lead-in assuming application is submitted in 22/23 (i.e. the year the joint plan may be adopted). Not sufficient evidence to demonstrate why higher rates would be achieved or shorter lead-in times achievable. <i>Site pushed back. Rates amended. Lack of evidence to justify proposed delivery.</i>
Beeston Park	20121516 S8/1	3,250	The delivery of Phases 2 and 3 of the site is reliant on the funding of a road. A bid for HIF funding was unsuccessful. Outline application approved and Phase 1 infrastructure RM has been made in 2018 (still undetermined). Phase 1 (c. 733 units) is all that can come forward. Rates amended to local averages. <i>Site pushed back. Rates amended. Lack of evidence to justify proposed delivery.</i>
North Rackheath	GT16	3,000	Site is a former allocation anticipated to start delivering in 2019/20. Part of the site will be developed by Halsbury Homes with an application for 350 units made in outline (ref. 20212010). Based on average lead-in times this will start delivering in Q1 2026 at a local rate of 40dpa. The majority of the site was formally being taken forward by Barratt homes but now taken over by Taylor Wimpey. No application has been made for their 4,000-unit masterplan; albeit one was expected before the end of 2021. Lead-in times and delivery rates overly optimistic for the Taylor Wimpey site. Assumed application for this development by April 2022. Higher rates justified across the allocation given its being developed as two separate sites by two separate developers. <i>Rates amended. Lack of evidence to justify proposed delivery.</i>
Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew	20090886 GT6	600	Site originally anticipated to start in 18/19. Remains with only an outline permission (approved Sep 21, having been submitted in 2016). Appears to have been delayed by the need to amend the roundabout that was originally approved. Rates are high against local rates. <i>Rates amended. Lack of evidence to justify proposed delivery.</i>
Norwich RFU	GT13	250	Development was originally anticipated to start delivering in 2018/19. Local media reports that the rugby club can no longer relocate as the University of East Anglia has pulled out of the plans given changing priorities and difficulty with a legal agreement on the uses on the land. There isn't sufficient evidence to suggest the site is developable. <i>Lack of evidence to demonstrate site is developable.</i>
LPA: Norwich			
East Norwich Strategic Regeneration Area	GNLPO360/3 053/R10	4,000	See Matter 8, Issue 1. Development pushed back to Year 11 and local rates applied. Not sufficient evidence to demonstrate why higher rates would be achieved or shorter lead-in times achievable. <i>Site pushed back. Rates amended. Lack of evidence to justify proposed delivery.</i>
Anglia Square	GNLPO506 08/00974/F 18/00330/F	800	Not sufficient evidence to demonstrate why higher rates would be achieved. <i>Site pushed back. Rates amended. Lack of evidence to justify proposed delivery.</i>
Ber Street 147-153 (allocation)	CC2	20	Originally allocated in 2004 and assumed to start delivering in 2018/19. Currently in use as a car sales forecourt. SoCG (ref. D2.21) does not provide sufficient detail to demonstrate why a site that is in use and has been allocated since 2004 will come forward now. <i>Lack of evidence to demonstrate site is developable.</i>
Ber Street, 10-14 (allocation)	CC3	10	Former allocation site from 2014 owned by the Council. Originally anticipated to start delivering in 2015/16. No development has occurred and the SoCG (ref. D2.22) does not provide the evidence to suggest its developable now after not coming forward since 2014. <i>Lack of evidence to demonstrate site is developable.</i>

Site Name	Site Ref.	No. Units (Total)	Lichfields Commentary
Bethel Street, land to rear of City Hall (allocation)	CC24	20	The site is in active use by the police. The SoCG (ref. D2.33) states " <i>Land to be assessed under strategic asset management framework and options considered. no programme for delivery at this time</i> ". Does not provide a realistic prospect of delivery at the point envisaged. Lack of evidence to demonstrate site is developable.
Bethel Street, 59, Labour Club site (permission, unimplemented residue of consented 22) (permission)	08/00671/F	14	This is not an allocation and the permission has expired. Permission expired.
Land at Ketts Hill and east of Bishop Bridge Road	R14 + R15	80	The SoCG provides some evidence that National Grid are bringing the site forward to enable development. However, it's a site that has been allocated since 2004 and has not come forward. There is not sufficient evidence to suggest the site is deliverable. Not deliverable. Site pushed back.
Bowthorpe Road, Norwich Community Hospital Site (allocation)	R37	80	This is a hospital site for which part of the allocation has a wider permission (ref. 18/00372/O) which includes various health related development and 12 units. The SoCG (D2.47) states that the site will be developed for a healthcare hub which may include some extra care units and key worker units. Unclear how this site will come forward for housing. Lack of evidence to demonstrate site is developable.
Dereham Road, Site of former Earl of Leicester PH, 238a (allocation)	R33 10/00335/ET	12	At the time of writing, there is no SoCG for the site. No progress since the site was allocated in 2014 where it was originally anticipated to start delivering in 2021/22. There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.
Garden Street, land at (allocation)	CC10	100	The site is in active use for car park and business uses. Originally allocated in 2014 and was anticipated to start in 2021/22. SoCG (ref. D2.27) states that its owned by the County Council and that its at the early stages of " <i>exploring options</i> ". There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.
Gas Hill, Gas Holder (allocation)	R13 18/00081/DEM	15	The SoCG provides some evidence that National Grid are bringing the site forward to enable development. However, it's a site that has been allocated since 2004 and has not come forward. There is not sufficient evidence to suggest the site is deliverable. Not evidence to demonstrate site is deliverable. Site pushed back.
Hurricane Way (allocation)	R29 - (A&B)	30	The SoCG (ref. D2.44) shows that there has been no progress on this site at all since it was previously allocated. Indeed, it is being appraised as part of the whole airport industrial estate. There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.
Lower Clarence Road, car park (allocation)	CC13	45	The site is currently a car park for the train station and used by the maintenance delivery unit. The SoCG (ref. D2.29) states that Network Rail need to liaise and develop the plans with the Local Authorities and taking account of the East Norwich masterplan. Document D1.3A notes " <i>currently limited likelihood of progressing with housing</i> ". There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.
Mile Cross Depot (allocation)	R36 18/01290/DEM	170	There is some evidence the site is coming forward being cleared. However, it was originally suggested that it was start delivering in 2020/21 and to date there is no planning application. The lead-in times are too small to achieve development in the 5-year period. Not evidence to demonstrate site is deliverable. Site pushed back.
Pottergate, Kiln House, 27-43 (permission)	18/01270/PDD 18/01271/PDD	0	The GNPD include 0 units in the supply. Notwithstanding, the site should be removed as these are office to residential permissions that appear to have expired. Permissions expired.
Rose Lane and Mountergate, land at (allocation)	CC4a + CC4b	250	The site was originally anticipated to start delivering in 2016/17 after allocation in 2014. The SoCG (ref. D2.23 & 24) states that the site is part owned by the City Council but has multiple landowners making assembly difficult. Its also suggest the Council will bring in temporary retail/leisure uses. They also show that one landowner is bringing forward an application for non-housing uses on part of the site. There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.
Thorpe Road: 13-17 Norwich Mail Centre (allocation)	CC15	150	From the SoCG (ref. D2.30) states that the site is in use by the Royal Mail and won't come forward until an alternative site is found. However, no timescales for that is given. Moreover, it states that Royal Mail needs to undertake further assessments to confirm that moving is operationally and financially viable. There isn't sufficient evidence to suggest the site is developable. Lack of evidence to demonstrate site is developable.

Site Name	Site Ref.	No. Units (Total)	Lichfields Commentary
Waterworks Road, Heigham Water Treatment Works (allocation)	R31	60	The site is in active use as a water treatment centre and the SoCG (ref. D2.46) confirms that its developer relies on Anglian Water changing its operational processes. Its of note that Anglian Water has recently made a major £36 million investment in the plant. There isn't sufficient evidence to suggest the site is developable. <i>Lack of evidence to demonstrate site is developable.</i>
Westwick Street Car Park (allocation)	CC30	30	The site was originally anticipated to start delivering in 2019/20. The SoCG (ref. D2.34) states that the site is owned by Norwich City Council but options are being assessed and there has been "no progress" to date. There isn't sufficient evidence to suggest the site is developable. <i>Lack of evidence to demonstrate site is developable.</i>
Westlegate 1-17, Boars Head Yard & St Stephens Street 1-9. (allocation) (permission)	18/00642/F 18/00651/PD D	69	New permission submitted for 143 bed HMO (ref. 21/01169/F). 143 beds will be arranged in 28 'clusters' which could be counted as 28 completions (in accordance with PPG ID: 68-029). <i>Amend delivery based on HMO.</i>
LPA: South Norfolk			
LNGS1 AAP Allocation	LNGS1 (part)	1,200	Applications submitted for the development and lead-in times justified (based on Lichfields averages). However, there is not sufficient evidence to suggest that these sites will deliver concurrently and achieve higher rates of delivery against local averages. <i>Amend rates. Lack of evidence to justify proposed delivery.</i>
	LNGS1 (part)	600	
Briar Farm, Mendham Lane	GMLP2136	405	Site is assumed deliverable, but no planning application has been submitted to date (the SoCG originally anticipated it would by April 2021). Given lead-in times, there is not sufficient evidence to demonstrate this as a deliverable site. <i>Not evidence to demonstrate site is deliverable. Site pushed back.</i>
Frontier Agriculture Ltd, Sandy Lane	GMLP0102	150	Owned by an agricultural company not a developer. The site is assumed deliverable but there is not sufficient evidence of development in the five-year period from the SoCG. <i>Not evidence to demonstrate site is deliverable. Site pushed back.</i>
South of Spirketts Lane	GMLP2108	150	Site owned by a farming family not a developer. The site is assumed deliverable but there is not sufficient evidence of development in the five-year period from the SoCG. <i>Not evidence to demonstrate site is deliverable. Site pushed back.</i>

Source: Lichfields Analysis

Q7. Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?

1.23 It is anticipated that this question will be addressed primarily by the GMLP Authorities. We have provided commentary in relation to the GMLP overall approach to Village Clusters allocations under Matter 2 Issue 4.