
**EXAMINATION OF THE GREATER NORWICH LOCAL PLAN
STATEMENT ON BEHALF OF TERRA STRATEGIC – ID 24244
LAND OFF BAWBURGH LANE, COSTESSEY**

MATTER 2 – VISION, OBJECTIVES AND THE SPATIAL STRATEGY

This Statement is made on behalf of Terra Strategic in respect of Land off Bawburgh Lane, Costessey. Terra Strategic control the majority of the site, with the remainder controlled by Norwich City Council, who are supportive of the development proposal and have agreed for Terra Strategic to take the lead with promotion of the Site through the Local Plan process.

The site forms a contingency allocation within the draft GNLP Sites Document as part of Policy GNLP0581/2043. This contingency site allocation is identified on Submission Policies Map – South Norfolk for approximately 800 homes plus other infrastructure including a primary school and sixth form provision.

A Promotional Document is appended to our Matter 2, Issue 1 Statement, which sets out how the site responds its context, and how it could be developed within the Plan period.

ISSUE 2

Housing Growth

1) Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national planning policy and guidance?

1.1 The figure is based upon the standard method for Norwich, Broadland and South Norfolk. One of the key factors in establishing the housing requirement will be whether the housing growth will support job growth. This is approximately 33,000 jobs, which is based on East of England Forecasting Model for 33,000 jobs over the Plan period¹. This is also supported by the evidence base suggesting approximately 33,000 jobs 2020-2038 based on an Experian forecast². We support this.

¹ Greater Norwich Local Plan Pre-Submission Draft Strategy [A1], paragraph 290

² Employment Land Assessment Addendum, November 2020 [B3.10], page 50

- 1.2 It appears from the latest SHMA that the standard method housing figure will support the job growth³, however the process for how this is concluded could be made clearer. The SHMA looks to have used Office for Budget Responsibility (OBR) economic activity rates (to convert the population growth associated with the standard method into economically active population), a double jobbing rate of 4.5%, and an in-commuting rate of 17.6%. We would support use of the OBR economic activity rates, and the double jobbing assumption appears reasonable.
- 1.3 The ability to deliver affordable housing is an issue that needs further attention. The following tables summarise affordable delivery and overall housing delivery over the past decade across the GNLP area⁴.

	11/12	12/13	13/14	14/15	15/16	16/17
Affordable completions	470	463	321	334	89	545
Overall completions	1182	1229	1303	1715	1902	2307
Affordable delivery as a % of overall delivery	40%	38%	25%	19%	5%	24%

	17/18	18/19	19/20	20/21	2011-2021	2016-2021
Affordable completions	572	728	601	323	4,446	2,769
Overall completions	2034	2757	2156	1466	18,051	10,720
Affordable delivery as a % of overall delivery	28%	26%	28%	22%	25%	26%

- 1.4 Affordable completions have only ever reached 728 in a single year (2018/19), significantly lower than the net need of 1,332 affordable dpa set out in the SHMA⁵.
- 1.5 Overall, the past decade has seen 25% affordable delivery (as a proportion of all completions); this would require overall need of 5,328 dwellings per annum to meet affordable need in full. The past five years has not shown much improvement, with affordable delivery representing 26% of overall delivery⁶; this would require overall need of 5,123 dwellings per annum to meet affordable need in full. This is before undertaking any detailed analysis of stock losses, which

³ Greater Norwich Local Housing Needs Assessment, June 2021 [B22.3], page 52

⁴ Taken from the Government’s [‘Live tables on affordable housing supply’](#), Table 1008c

⁵ Greater Norwich Local Housing Needs Assessment, June 2021 [B22.3], paragraph 6

⁶ As noted in the table on page 4 of this Statement – 2,769 dwellings over five years

could lead to the recorded delivery of affordable housing being much lower due to losses to demolition and schemes such as Right to Buy.

- 1.6 This means that although affordable housing need does not have to be met in full, the proposed housing requirement would deliver less than half of the affordable need based on historic provision as a proportion of all completions. Within the Council’s evidence base, the forecast for affordable housing completions for August 2021 to 2026/26 only anticipates a peak (in this period) of 895 affordable dwellings, averaging 662.6 dwellings over five years⁷; still under half of the net need of 1,332 affordable dwellings per year. Whilst it is hoped delivery will pick up as more sites come forward, there are potential viability issues with a number of the strategic sites, for example East Norwich (see below) and Anglia Square (an application for its redevelopment was dismissed by the Secretary of State, and even then this high density scheme required public support to ensure it could be viably delivered⁸, although we understand there is funding from Homes England which will help). The combination of these factors means that the Plan does not make sufficient provision for affordable housing (as required by NPPF paragraphs 20 and 62) and will not result in sustainable development (NPPF paragraph 8). The approach is therefore unsound as it not positively prepared or consistent with national policy. There is a clear and compelling justification to fully allocate our site (Policy GNLP0581/2043) now, rather than wait for under-delivery against the Housing Delivery Test, which itself does not take into account affordable housing delivery.

Suggested changes/clarifications

- 1.7 In order to ensure the Plan delivers the required affordable housing, the contingency site at Policy GNLP0581/2043 should be included in the overall housing requirement as a full allocation. This will also assist with the early delivery of housing within the Plan period. If the site is to remain a contingency allocation we have suggested amendments to the triggers in our response to Matter 2.

2) Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?

- 2.1 Yes. We support the settlement hierarchy and the inclusion of Costessey within the Norwich Urban Area. This is consistent with the adopted Joint Core Strategy (Policy 9) and is further

⁷ Topic Paper for Policy 5: Homes [D3.6], paragraph 76

⁸ Greater Norwich Local Plan Pre-Submission Draft Strategy [A1], paragraph 320

justified by the latest evidence base documents [B1.2 to B1.13], for example the Costessey Booklet [B1.5], which sets out the sustainability of the area, stating that:

“Costessey has one of the largest populations in South Norfolk, having seen significant amounts of development in recent years, and includes one of Greater Norwich’s strategic employment locations at Longwater.”

“There is a wide range of local services within Costessey, including three primary schools and a secondary school. There are regular peak hour bus services into Norwich.”

3) Are all of the settlements listed in the correct level within the hierarchy?

3.1 Yes.

4) Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

4.1 Yes, albeit we object to the identification of our site as a contingency allocation, rather than full allocation.

5) To what extent does the distribution of housing sites across the settlement hierarchy reflect a policy down approach or one of site availability or previous commitments/allocations?

5.1 A significant proportion of the housing land supply is reliant on existing commitments, a large quantity of which are strategic sites which may prove to be challenging in their ability to deliver housing (especially affordable housing) within the earlier years of the Plan period. This includes East Norwich, which is anticipated to deliver 200 dwellings between 2024-26 and Anglia Square, which is expected to deliver 800 dwellings between 2026-32⁹.

⁹ Topic Paper - Policy 1 Growth Strategy - Appendix 4 spreadsheet [D3.2A], page 4

5.2 It is not immediately clear what the justification is for our site (Policy GNLP0581/2043) being a contingency site as opposed to a full allocation. There is a significant residual need for affordable housing and it is agreed that the site is suitable, viable, available and, therefore, acceptable in principle. Further, there is an agreed identified requirement for the relocation of a sixth form onto the site. There is no evidence that it is deliverable elsewhere. The site is, therefore, required to be developed because (otherwise) the required education infrastructure will not be delivered, contrary to NPPF 24-27 and 35(a), (b), (c) and (d).

Suggested change

5.3 Additional flexibility for housing supply (and to assure delivery of affordable housing and education provision) would be achieved through amending Policy GNLP0581/2043 to a full allocation.

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

6.1 Yes, we agree a significant buffer is required (as a minimum) to protect against under delivery and to accommodate potential higher growth rates through national changes including to the standard method. Under-delivery is a significant risk given the challenging nature of some of the sites, for instance East Norwich Strategic Regeneration Area¹⁰, with the Deal Ground / May Gurney Site, Utilities Site, and Carrow Works requiring significant coordination around infrastructure delivery, including bridges over the River Yare. There are significant constraints around flooding, utilities and the railway. Some of these sites have been proposed for some time, for instance the Deal Ground was initially allocated in both the City of Norwich Local Plan 1995 and the City of Norwich Replacement Local Plan 2004¹¹. Whilst we do not doubt there is now more evidence around deliverability, and it is appreciated the availability of Carrow Works should help to unlock this, we think there are still risks. Indeed, the report to Norwich City Council Cabinet on 17th November 2021 confirms that the Stage 1 masterplanning work has resulted in a reduction in capacity from 4,000 to 3,469 dwellings. Stage 2 work around infrastructure and viability is ongoing but there are likely to be challenges, as noted at paragraph 29 of the Cabinet report. The reduction in 531 dwellings already represents a reduction in the buffer from 22% to 20.8%.

¹⁰ Allocation totalling 4,000 dwellings

¹¹ Norwich Local Plan Site Allocations and Site Specific Policies Plan (2014), page 175

Suggested change

6.2 Amending Policy GNLP0581/2043 to a full allocation will restore the buffer and provide flexibility through early delivery of housing in a sustainable location.

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

7.1 We have no specific comments to make.