

Greater Norwich Local Plan Examination in Public (Part 1)

Matter 3, Issue 1

Statement on behalf of Halsbury Homes Ltd



MATTER 3 – STRATEGY FOR THE AREAS OF GROWTH

Issue 1 - The Norwich Urban Area including the fringe parishes

Q1. Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?

[Jointly prepared with Lichfields]

- 1.1 As set out in Matter 2, we have concerns that the spatial strategy and selection of development sites as proposed in the GNLP will not be effective in ensuring the overall deliverability of the housing growth required, and that in order to ensure that the Plan is found sound in meeting its housing needs throughout the plan period, the growth strategy requires amendment to ensure that policy is in place to allow a new settlement to come forward that will deliver homes within the plan period to 2038. Our response to Matter 3 Issue 6 suggests how we consider this should be achieved in policy.
- 1.2 The reason we contend that the growth strategy is not deliverable is because a strategy which focuses development in the Norwich urban area relies on sites that are (a) unlikely to come forward at all and/or (b) will not deliver at the rate assumed by the GNDP. There is a lack of evidence from the GNDP that many of its urban sites are: suitable for development (for example, the East Norwich site faces difficulties with pollution and biodiversity/ecology); available (including those with existing uses which have no realistic prospect of vacating/relocating in the short or medium term); or achievable (because of viability issues, owing to the weak market for flats in the local housing market).
- 1.3 We have provided details below on the factors which we consider adversely affect the deliverability of the site allocations in the Plan as submitted.

(i) Historic Under-Delivery

- 1.4 We are concerned at the over-reliance on large scale brownfield urban sites with known delivery constraints. Specifically in relation to East Norwich, there is clear evidence that historically the site has repeatedly failed to come forward and the Greater Norwich Development Partnership (GNDP) has not presented any evidence to show that circumstances have substantially changed such that it will soon begin delivering. At least two parcels within the site carry allocations dating back to at least 1995, featuring again in subsequent plans in 2004 and most recently in the Norwich Site Allocations Local Plan 2014 ('SALP', sites refs R9 and R10). Specifically:

- (i) For the SALP Site **R9** (south of the river, the Deal Ground) an initial options appraisal and various technical studies were prepared and consulted on in 2007, with the various local authorities preparing a pre-application advice note in 2009 (updated in 2010). The SALP

identifies a number of key issues and constraints including viability, the need for substantial new infrastructure (including new bridges over the river), impact of noise/dust/odour from the nearby railway and other industrial uses, removal of existing redundant utility infrastructure (including overhead power lines) and address site contamination. The site also has issues related to flooding, biodiversity, heritage, water environment vulnerability and landscape will need to be addressed. An outline application for up to 670 dwellings was submitted in April 2012 and granted in 2013. In June 2020 an application for a non-material amendment to this application was made to alter the wording of a number of conditions (this was subsequently approved in September 2020) although there appears to have been no further planning progress on this site in the interim period or since;

- (ii) For the SALP Site **R10** (north of the river, the Utilities site), this has similarly been allocated since at least 1995. The SALP refers to an outline application dating from 2010 (10/02172/O) although this cannot be found on the Council's website and there does not appear to have been any activity since. Again, the site is subject to a number of the same constraints as site R9.

- 1.5 This raises significant questions as to the assumed lead-in time of the East Norwich site, given the site has been identified for nearly c.25 years with almost no real progress made towards delivering development on the site. Our wider concerns about the East Norwich site are set out in further detail in our response to Matter 8 Issue 1. Whilst the Part 2 Plan (at para 2.9) asserts that the allocation of the Carrow Works site (south of the river, west of the railway line) will now help in unlocking the sites east of the railway line (Deal Ground, Utilities), many of the fundamental constraints (the need for new bridges and roads, and the need to address flooding, biodiversity and other issues) remain; these are constraints which continue to exist and the allocation of the Carrow Works site does not in and of itself address these constraints and make the development of the Deal Ground/Utilities sites suddenly feasible.
- 1.6 In relation to other urban sites, our response to Matter 2 Issue 2 (Q6) sets out a detailed review of the housing trajectory. It illustrates that a number of urban sites were allocated in the previous local plan (or indeed earlier plans) and were anticipated to have commenced delivery, but have not. They have been carried over into the emerging plan without being re-appraised for their deliverability and without new evidence to show why they are now expected to deliver, having failed to start delivering as anticipated in the previous plan. For example, the site 'King Street, 125-129, 131-133 and Hoborough Lane' (allocation CC7) was originally anticipated to commence delivery in 2015/16 but has still not come forward.
- 1.7 Given the historic lack of delivery across many of its urban sites, especially East Norwich, the GNDP should provide clear evidence to show why it considers these sites are now able to come forward. Focusing development on sites with a historic lack of delivery – especially where these

sites were previously allocated but did not deliver as expected – risks undermining the overall spatial strategy and deliverability of the plan.

(ii) Site Availability

- 1.8 In relation to East Norwich specifically, Statements of Common Ground submitted by the various landowners show parts of the site not to be currently available (for example the Network Rail owned land, as outlined in D2.4 is subject to a number of current operations). Further, the nature of uses on these sites (railway maintenance sites and depots) means the site is highly unlikely to be available even in the medium or long term, since the relocation of these uses will take years, potentially decades and relies upon suitable and feasible alternative sites being found. We provide further detail on the availability of the sites in the East Norwich area in our response to Matter 8 Issue 1 Q3.
- 1.9 In relation to other urban sites, our response to Matter 2 Issue 2 Q6 notes numerous urban sites which are currently unavailable, including:
- (i) Thorpe Road: 13-17 Norwich Mail Centre (CC15) - this site is in use as a royal mail centre that requires an alternative to be developed;
 - (ii) Waterworks Road, Heigham Water Treatment Works (R31) - this site is in use as an Anglian Water treatment site; and
 - (iii) Bowthorpe Road, Norwich Community Hospital Site (R37) – this site in use as part of wider hospital complex.
- 1.10 Whilst some sites may become available in the short-term, like the Network Rail owned land in the East Norwich area others require alternative sites to be identified to relocate their current use (for example, the Norwich Mail Centre). This relies on there being suitable and feasible alternative site, with the potential for new development needed on any new site to allow the use to continue, followed by the demolition of existing buildings (plus remediation work, if necessary) on the site before any delivery of housing can occur. There is no evidence from the GNDP as to the anticipated timescales for this.
- 1.11 The GNDP should provide evidence on the availability of these urban sites and provide a realistic timescale for their availability for housing, having consulted with any existing landowner/occupier to understand their likely timescales for vacating the site. Without this evidence there is a risk that urban sites will be allocated which have no realistic prospect of delivering housing in the plan period, undermining the deliverability of the plan. There is evidence of this having occurred in the previous plan with carried forward allocations which did not become available as envisaged, and there is a real risk this will continue to occur in the emerging plan.

(iii) Delivery rates and Market Absorption

- 1.12 Our response to Matter 2 Issue 2 Q6 provides a detailed review of historic housing delivery across Greater Norwich which concluded there is clear evidence that housing delivery in Greater Norwich occurs at a lower rate than the national average, by around 20%. This was based on how sites which are currently being built out in Greater Norwich - all of which are greenfield sites - compare with delivery rates for comparably sized sites analysed in Lichfields research 'Start to Finish' (see Matter 2 Statement). The research also found that greenfield sites deliver 34% more homes per year than brownfield sites, meaning delivery rates for brownfield sites in Greater Norwich were likely to be even lower than wider averages. Our response to Matter 2 Issue 2 Q6 subsequently provides a revised housing trajectory, based on this analysis, including for urban sites.
- 1.13 Slower delivery rates on urban sites in Greater Norwich are also anticipated due to the inability for the market to quickly absorb development of this nature – which is primarily higher density, flatted development; this is evident from house price data. House prices nationally, regionally and across Norfolk now stand comfortably above their pre-recession peak (54% for England across all dwelling types, 67% for East and 50% for Norfolk) as shown in Table 1. Across England, terraced housing and flats have also seen strong growth, now 45% and 41% above their pre-recession peak respectively. However, in Greater Norwich flat price growth has been notably weak with prices failing to grow in line with wider averages or growth for other types of housing (e.g. terraced housing). Indeed, in Norwich itself flat prices have struggled to recover to their pre-recession peak and have been fairly flat over the last decade or so.

Table 1 Change in median prices - December 2007* to March 2021

	All types	Terraced	Flats
England	54%	45%	41%
East of England	67%	63%	37%
Norfolk	50%	36%	12%
Broadland	46%	41%	17%
Norwich	34%	38%	0%
South Norfolk	45%	37%	8%

Source: ONS House Price Statistics. *December 2007 broadly represents the pre-recession peak in each area.

- 1.14 This illustrates the lack of demand specifically for flats in Greater Norwich, especially in Norwich itself, relative to other housing types and wider averages. This issue is likely to become even more apparent in the aftermath of the Covid-19 pandemic which will see an increased importance placed on space, potentially leading to an increase in demand for houses in accessible locations and reducing demand for flats in city centre locations. It further justifies the adoption of a more modest build-out rate for brownfield, flat-led developments in Norwich (compared with, for example, national averages).

- 1.15 In relation to East Norwich specifically, there is a fundamental issue with the trajectory because the exact quantum of development will be unknown until the masterplan is progressed. This masterplan will need to factor in the numerous site constraints whilst also delivering a product which can be absorbed into the market (a point we turn to below). Secondly, the trajectory assumes that once commenced, East Norwich will deliver 500 dwellings each year from 2031/32 to 2033/34. Lichfield's research 'Start to Finish' did not find any evidence of such high and sustained build-out rates, even on greenfield sites with multiple outlets in very strong housing markets (i.e. in the wider South East, within London's sphere of influence¹). Sites of 2,000 or more homes delivered anywhere between 50 and c.300 dwellings per year on average, with an overall average of c.160 dwellings per year². Assuming delivery at 500 dwellings per year consistently, the GNDP is effectively assuming that it can meet and exceed by 40% the highest average build out rate seen on any large-scale development elsewhere. There is simply no evidence that any site – let alone a brownfield site delivering primarily flatted development within this specific housing market area - could be capable of delivering anywhere near 500 dwellings per year. The market for flats in Greater Norwich is not buoyant which suggests a preference for larger, lower density suburban/rural housing and poses potential viability issues for urban sites.
- 1.16 The GNDP's current housing trajectory is considered overly optimistic because it assumes rates of housing delivery which exceed what is likely to be seen across Greater Norwich, especially so on brownfield sites. The trajectory should be revised (our suggested revisions are set out in detail in our response to Matter 2 Issue 2 Q6) to reflect the likely delivery on sites to ensure enough sites are allocated overall to meet the housing requirement.

(iv) Site specific issues (East Norwich)

- 1.17 The GNDP is now working with Homes England to bring forward the East Norwich site. However, the numerous and substantial issues and constraints which have been identified across the site (in the SALP and in the various applications on some parcels of land) still fundamentally remain and there is no evidence of these constraints being overcome or issues being addressed. Statements of Common Ground have been submitted by the three key landowners; Network Rail, Fuel Properties Ltd and National Grid/RWE (D2.2/2.3/2.4). Two of these highlight key deliverability issues for the East Norwich Regeneration Area:
- (i) The Network Rail SoCG (D2.4) notes that large areas are subject to significant noise, smell and dust pollution which may be incompatible with residential development. Without these uses being moved elsewhere (which may not be possible, let alone feasible or achievable in the short or medium term) this could be a fundamental barrier to delivery at this site; and
 - (ii) The National Grid/RWE SoCG (D2.2) notes that development of the Utilities Site is 'entirely reliant' on the delivery of a spine road from the Deal Ground site and a new bridge. This

¹ For example the sites included The Hamptons in Peterborough, The Wixams in Bedford, Cambourne in South Cambridgeshire, East of Milton Keynes, Beaulieu Park in Chelmsford, Great Western Park in South Oxfordshire, Kings Hill in Tonbridge and Malling, North West Cambridge in Cambridge/South Cambridgeshire, West of Waterloo in Havant/Winchester and various sites in Wokingham.

² This finding was broadly consistent between the First Edition (2016) and Second Edition (2020) of Start to Finish.

represents a significant upfront infrastructure requirement for which no viability or deliverability evidence has been prepared.

1.18 There is no evidence that the site overall is suitable (owing to the various landscape, biodiversity and heritage constraints that exist, plus the range of existing uses which conflict with potential residential uses) and achievable (particularly given the scale of remediation works needed and necessary infrastructure including roads, bridges and various public transport networks). We explore this further in our response to Matter 8 Issue 1.

(v) 'Rollover' of Allocations

1.19 In addition, we note that the majority of these site allocations are those rolled forward from previous plans, and of the 26,019 homes proposed under Policy 7.1, c. 80% are previous allocations. Furthermore, over 90% of the housing numbers newly allocated are located on three strategic sites (with around 50% reliant on the regeneration of the East Norwich brownfield sites).

1.20 We also note that the remainder of the Greater Norwich area is characterised by a dispersed settlement pattern made up of predominantly small scale settlements. Whilst 14% of growth is allocated to the Main Towns, only one third of these are new allocations with the remainder being rolled forward from previous plans. The balance of the housing requirement is proposed to be met in key services centres or villages.

1.21 The significant 'rollover' of previous allocations – including strategic urban extensions in and around the Growth Triangle – accounting for "*almost half the housing growth and the majority of the strategic employment areas*" (GNLP paragraph 338) - are located in the Norwich Urban Area. This undoubtedly poses a risk to the overall deliverability and soundness of the Plan.

(vi) Perpetuation of Dispersed Growth Strategy

1.22 The area growth strategy as set out in Policy 7.1 – effectively a continuation of previous growth plans - will also fail to secure a meaningful shift from a car-dominated 'in-commuting/high travel' dispersed settlement growth strategy to the highly sustainable, clean growth/post-carbon spatial growth strategy which the Plan itself states as part of its Vision and Objectives (as well as to secure the regional priority now being given to focused growth supporting CNTC ambitions).

(vii) Contingency Site

1.23 Our Matter 2 Issue 2 (Q6) response addresses the Costessey contingency site. In summary, we are of the view that delivery of this site would only be triggered very late in the local plan period and as such this site would deliver very few homes within the plan period.

Q2. Does Policy 7.1 support the city centre's role as a key driver of the Greater Norwich economy and is it consistent with national policies for ensuring the vitality of town centres?

Q3. Do the sites listed in the East Norwich section of Policy 7.1 on page 106 of the Plan, form part of the East Norwich Strategic Regeneration Area as defined on the proposals map, other allocations on the proposals map, or potential sites for future development? For example, is 'Land East of Norwich City FC' site reference CC16 in the Plan?

Q4. Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?

Q5. Does Policy 7.1 need to be modified to replace references to primary and secondary retail frontages with 'Primary Shopping Areas'?

Q6. Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNLP0360/3053/R10?

1.24 It is anticipated that these questions will be addressed by the GNLP Authorities and other participants.