



GREATER NORWICH LOCAL PLAN EXAMINATION

Examination Hearing Statement for Matter 8

**Response on behalf of Pigeon Investment Management Ltd and their
Landowners**

January 2022

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1. INTRODUCTION

1.1 This Hearing Statement has been prepared by Pigeon Investment Management limited ("Pigeon") and their Landowners, in respect of a number of land interests within both Broadland and South Norfolk Districts.

1.2 Pigeon has previously submitted representations in response to the Greater Norwich Local Plan (GNLP) and the accompanying Sustainability Appraisal (SA), including the Pre-Submission Regulation 19 Publication Stage, where we submitted representations in support of the following sites:

- Land north of Brecklands Road, Brundall (GNLP0352)
- Land at Nelson Road, Diss (GNLP1045)
- Land at Walcot Green Lane, Diss (GNLP1044R)
- Land at Hethersett (GNLP4054, GNLP1023BR, GNLP4052, GNLP4052)
- Land at Dereham Road, Reepham (GNLP0353R)
- Land at Rightup Lane, Wymondham (GNLP0355)

2. MATTER 8 – STRATEGIC GROWTH AREAS ALLOCATIONS

Issue 1 –East Norwich Strategic Regeneration Area

Q1. The report to the Cabinet of Norwich City Council on 16 November 2021 indicates that the expected number of homes on the site should be reduced to 3469. Is the capacity of 4000 homes for the East Norwich Strategic Regeneration Area realistic and justified by the evidence?

2.1 The report to the 17th November 2021 Cabinet meeting itself states (para. 28) (our emphasis):

"The overall level of housing development [identified in the emerging masterplan] is somewhat lower than that envisaged in the allocation policy in the emerging GNLP"

2.2 The evidence thus indicates that even if the site does come forward, it would not deliver 4000 homes, but instead some 530 fewer homes – a reduction of over 13%.

Summary: If retained in the GNLP, the capacity of the site should be reduced.

Q2. Is the expectation that all 4000 homes on the site can be delivered before the end of the plan period realistic and justified by the evidence?

2.3 The 17th November 2021 Cabinet meeting states (para. 9):

"It is important to note that the Stage 1 masterplan is intended to be a high level document which will be worked up in greater detail in Stage 2, particularly in relation to infrastructure provision, phasing, deliverability and viability".

2.4 The report continues (para. 34) (our emphasis):

"The GNLP public examination hearings will be held in early 2022 and, whilst the Stage 2 work may not be completed by then, the fact that the Stage 1 masterplan has been produced and that the Partnership members, including landowners and national agencies such as Homes England and Network Rail, are working together in a positive manner should give the Inspectors confidence in terms of the site's eventual deliverability."

2.5 It is considered that the GNLP is correct to suggest that East Norwich represents a 'long term growth option'. Even without such a reliance upon future documents, the brownfield regeneration of historic industrial and former manufacturing areas takes many years of concerted effort, often with the

- intervention of the public sector to address funding gaps owing to constraints such as contamination, heritage and flood risk.
- 2.6 As indicated by the commentary in the Cabinet report, there is currently no evidence to provide any certainty that the site will be delivered, no certainty on phasing and certainly no certainty that 4000 (or even 3,469) homes will be complete by 2038.
- 2.7 Overall, noting also our response to Questions 5 and 6 below, we consider that there is a significant likelihood, if not probability, that a substantial proportion of the homes proposed on the site will not be delivered during the plan period.

Summary: No evidence has been provided that the site can deliver 4,000 (or 3,469) homes during the plan period.

Q3. Is the site available and viable? Where is the evidence for this?

- 2.8 Whilst the site would appear to be available, this is subject to various identified constraints being overcome.
- 2.9 As noted above, the 17th November 2021 Cabinet meeting states (para. 9) (our emphasis):

"It is important to note that the Stage 1 masterplan is intended to be a high level document which will be worked up in greater detail in Stage 2, particularly in relation to infrastructure provision, phasing, deliverability and viability".
- 2.10 The report itself states (para. 29) (our emphasis):

"The emerging masterplan viability work suggests that the overall East Norwich development proposition will create some financial value, however there are likely to be challenges in terms of the relationship between the timing of costs and revenue. This is not uncommon in developments of this scale and complexity at this stage, and cost / value data is invariably highly sensitive subject to input assumptions".
- 2.11 This commentary does not provide evidence that the site is viable; in fact it identifies that there is not yet evidence of viability.

Summary: Whilst there is evidence that the site is currently available, there is no evidence of viability.

Q5. Does the evidence support the position that 100 homes will be delivered on site in the 2024/25 period? When is commencement expected? What are the key stages that have to be met? Does the evidence support that lead in time?

- 2.12 Outline planning permission was granted at the Deal Ground in 2013 but as yet no further progress has been made. This is not only indicative of the length of time that it can take to resolve issues on large brownfield sites prior to delivery, but it may also be symptomatic of a particular issue on this site which may not be able to be resolved. Similarly, the Utilities site was subject to a planning application in 2015 which was then withdrawn owing to funding issues.
- 2.13 The Stage 1 Masterplan does not include information regarding phasing, with the report to the 17th November 2021 Cabinet meeting recognising that further work is required in relation to infrastructure provision, phasing, deliverability and viability.
- 2.14 In this context, the delivery of 100 homes on the site in the 2024/25 has not been evidenced, nor has the delivery trajectory thereafter (see also our responses to Questions 2 and 6). Moreover, the time required (para. 30) 'to look in greater detail at the timing of costs / receipts and develop appropriate strategies for both securing upfront investment and capture long term value to repay that investment' should not be underestimated. Then there are the necessary permissions, lead in times, remediation and mobilisation as well as permissions required for a start on site. Overall, it would appear distinctly unlikely that completions will occur in a little over 2 years' time.

Summary: There is no evidence to support the proposed delivery trajectory, or the delivery of 100 homes during 2024/25.

Q6. Does the evidence support the housing trajectory for the site which includes a delivery of 500 homes in 2031/32 and 2033/34? What assumptions regarding infrastructure delivery, site assembly, and lead-in times have been made?

- 2.15 The absence of detail on infrastructure provision, phasing, deliverability, viability, appropriate strategies for both securing upfront investment and capture long term value to repay that investment means that delivery of 500 homes in 2031/32 and 2033/34 cannot be assumed.

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- 2.16 As highlighted above, the Cabinet report refers (para. 34) to (our emphasis):
"... the site's eventual deliverability."
- 2.17 Factors such as housing mix/tenure, the necessary permissions, lead in times, remediation and mobilisation, permissions required for a start on site and then absorption rates will also all influence the delivery timetable and are uncertain.
- 2.18 It is considered unlikely that this one site will deliver one quarter (500 / 2,000 homes) of all the housing to be delivered in the Greater Norwich Area in any particular year. By way of comparison, the next two largest sites in the housing trajectory – Beeston Park (3,520 homes) and North Rackheath (3,000 homes) are projected to deliver at a maximum rate of 150 and 175 homes per year. Indeed, no other site in the trajectory is expected to deliver more than 190 homes in any one year, and yet this site is expected to deliver an average of almost twice that (360 homes per year) consistently between 2028/29 and 2037/38.

Summary: There is no evidence to support the proposed delivery trajectory, or the delivery of 500 homes during 2031/32 and 2033/34.