

# **Greater Norwich Local Plan Examination in Public (Part 2)**

Matter 10

Statement on behalf of Halsbury Homes Ltd



# Greater Norwich Local Plan Examination

**On behalf of** Halsbury Homes  
**Our ref** 64264/01/MS/BHy  
**Date** 11 February 2022

## **Subject Matter 10 – Housing and mixed-use allocations - new sites without planning permission that are allocated for less than 500 dwellings**

For Matters 9, 10, 11, & 12 we set out our review of the sites raised in the Part 2 MIQs. There are additional sites (such as those in the Growth Triangle and the LNGS1AAP Allocation) for which questions have not been asked. Our amends to these are detailed in Matter 15 (for the Growth Triangle sites) and in our Matter 2 (Issue 2) Statement.

For all the sites, we have reviewed them considering the following:

- The definition of ‘deliverable’ in the NPPF noting the requirement to publish ‘clear evidence’ for sites without a detailed planning permission. Furthermore, we have considered the types of evidence that can form ‘clear evidence’ as set out in the PPG (ID: 68-007).
- The definition of ‘developable’ in the NPPF and its test relating to whether or not there is a ‘realistic prospect’ of the site being available at the point envisaged, as well as being viability tested at that point;
- The requirement to undertake an overall risk assessment in the PPG with regards to a housing trajectory (ID: 3-024); the types of considerations to assess where sites are ‘likely’ to be developed (ID: 3-017); and from this factors associated with availability, achievability, and presentation of the rate of development (ID: 3-018 to 3-022).
- Lichfields ‘Start to Finish’ (2<sup>nd</sup> Edition) report which details average lead-in times for development sites based on development size. It also provides some evidence on how higher delivery rates on sites can be achieved which is useful for considering whether there is evidence to justify higher rates where they have been assumed;
- Evidence of local delivery rates as per our Matter 2 (Issue 2) Statement; and
- The evidence produced by the Partnership including the various iterations of the HELAA, Topic Papers, and SoCGs.

### **1.0 Main Towns**

#### ***g. Land at Briar Farm, Harleston (Ref. GNLP2136)***

#### **Q4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)**

- 1.1 No.
- 1.2 The site is assumed deliverable, but no planning application has been submitted to date. The SoCG (ref. D2.83) notes an application was assumed to have been made by April 2021 (though this may be a drafting error?). Notwithstanding, given known lead-in times and local delivery rates, when looking at the evidence in the SoCG we do not consider there is sufficient evidence to

demonstrate this site can deliver as quickly as anticipated or at the rates expected. This is with reference to the definition of deliverable (Annex 2, NPPF) requiring the publication of 'clear evidence' and the types of evidence to demonstrate deliverability in the PPG (ID: 69-007).

- 1.3 We have therefore suggested an amendment to the trajectory; noting that whilst this does not reduce the Partnership's overall supply it will impact on the delivery of homes in the early part of the plan period.

Table 1 Amended Delivery - Land at Briar Farm, Harleston

Trajectory	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)
Partnership				75	75	75	75	75	30											405
Lichfields				0	0	0	40	40	40	40	40	40	40	40	40	40	5			405 (-0)

***i. Land south of Burgh Road and west of the A140, Aylsham (Ref GNLPO311, 0595 and 2060)***

**Q4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)**

- 1.4 No.
- 1.5 The site is assumed deliverable, but no planning application has been submitted to date. The SoCG (ref. D2.77) notes the site is being taken forward by Hopkins Homes and an application will be submitted in 2022. Notwithstanding this, given known lead-in times and local delivery rates, when looking at the evidence in the SoCG we do not consider there is sufficient evidence to demonstrate this site can deliver as quickly as anticipated or at the rates expected. Nor do we consider the site to be deliverable (as per Annex 2, NPPF); noting the requirement to publish 'clear evidence' and considering the types of evidence to demonstrate deliverability in the PPG (ID: 69-007).
- 1.6 We have therefore suggested an amendment to the trajectory; noting that whilst this does not reduce the Partnership's overall supply it will impact on the delivery of homes in the early part of the plan period.

Table 2 Amended Delivery - Land south of Burgh Road and west of the A140, Aylsham

Trajectory	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)
Partnership					50	50	50	50	50											250
Lichfields					0	0	40	40	40	40	40	40	10							250 (-0)

## *j. Land at Frontier Agriculture Ltd, Sandy Lane, Diss (ref. GNLPO102)*

### **Q4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)**

- 1.7 No.
- 1.8 The site is assumed deliverable, but no planning application has been submitted to date. The SoCG (ref. D2.81) notes an application will be submitted in 2023 but does not state whether a developer is in place to deliver the site. Notwithstanding, given known lead-in times and local delivery rates, when looking at the evidence in the SoCG we do not consider there is sufficient evidence to demonstrate this site can deliver as quickly as anticipated or at the rates expected. This is with reference to the definition of deliverable (Annex 2, NPPF) requiring the publication of 'clear evidence' and the types of evidence to demonstrate deliverability in the PPG (ID: 69-007).
- 1.9 We have therefore suggested an amendment to the trajectory; noting that whilst this does not reduce the Partnership's overall supply it will impact on the delivery of homes in the early part of the plan period.

Table 3 Amended Delivery - Land at Frontier Agriculture Ltd, Sandy Lane, Diss

Trajectory	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)
Partnership						75	75													150
Lichfields						0	0	40	40	40	30									150 (-0)

## **Conclusion**

- 1.10 Given the uncertainties over the delivery trajectory for the above sites and the consequential impact on the ability of the plan to deliver the homes needed in the Plan area to 2038, we consider it is appropriate for the Partnership to review and amend Table 6 of the GNLP.