Greater Norwich Local Plan Examination in Public (Part 2)

Matter 12

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 12 – Housing and mixed use allocations – sites with extant planning permission

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 suggested 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' (2nd 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.

g. The Norwich Community Hospital site, Bowthorpe Road (Ref R37)

- 1. Does the site still benefit from an extant planning permission for housing development?
- 1.1 Yes 18/00372/O.
 - 2. Are the site specific delivery assumptions justified?
- 1.2 No.
- 1.3 This is a hospital site for which part of the allocation has a wider permission (ref. 18/00372/O) which includes various health related developments and 12 residential 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. It is therefore unclear how this site will come forward for additional housing in the quantum and timescale envisaged.

Table 1 Amended Delivery - The Norwich Community Hospital site, Bowthorpe Road (Ref R37)

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											40	40								80
Lichfields											12	0								12
																				(-68)

Conclusion

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.