



HEARING STATEMENT

Examination of the Greater Norwich Local Plan

On behalf of:
Orbit Homes

In respect of:
Matter 15 – Housing Provision

Date:
February 2022

Document Reference:
GA/DJ/00320/S0005

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Orbit Homes in respect of **Matter 15 – Housing Provision** of the Inspector’s Matters, Issues and Questions (Part 2) for the Examination of the Greater Norwich Local Plan (the ‘GNLP’). It answers Question 5 with respect to the delivery of Policy LNGS 1 of the Long Stratton Area Action Plan.
- 1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan and will form the basis of our points for discussion at the Examination Hearing session on 9th March 2022.

2.0 Questions

Question 5

Are the assumptions for homes to be delivered on existing commitments justified? Will 31,452 homes will be delivered on these sites between April 2020 and 2038?

- 2.1 No, with respect to the delivery of Policy LNGS 1 of the Long Stratton Area Action Plan the delivery assumptions are not justified by evidence. As set out below, we forecast that 970 dwellings will be delivered on this allocation between April 2020 and 2038. This is 800 fewer than the 1,770 dwellings forecast in the current GNDP trajectory (ref. D3.2C).

Background

- 2.2 The Long Stratton Area Action Plan (LSAAP) sets out policies and guidance to help deliver the required growth of at least 1,800 new houses and 9.5 hectares of employment development up to 2026 to support the form and function of the village and to deliver a bypass on the A140. Policy LNGS1 allocates 140.1 hectares of land for such uses to the east, south-east and north-west of Long Stratton. The policy sets out that the delivery of the bypass must be secured before any housing is permitted on this site and that the bypass must be completed before 250 of the new homes are occupied.
- 2.3 Two planning applications have been submitted that cover the extent of the Policy LNGS1 allocation:
- **2018/0111 | Land East of the A140:** Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions.

- 2018/0112 | Land West of the A140:** Hybrid Application on 40.8 hectares of land to the west of the A140 seeking outline planning permission for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road (including a roundabout access at the north to the A140 and a priority junction access to Swan Lane at the south) and with phase 1 housing consisting of 213 no. dwellings, associated infrastructure and public open space.

2.4 These application were submitted in 2018 by Norfolk Homes, but placed on hold due to issues with securing funding for the bypass. The delay in securing this funding has led to repeated delays in the delivery forecasts for the allocation. As shown in the table below, which compares the trajectories set out in recent Joint Core Strategy (JCS) Annual Monitoring Reports (AMR) and the Policy 1 Topic Paper (Ref: DC3.2C), the allocation was originally forecast to deliver all 1,800 dwellings during the JCS plan period to 2026, but it is now forecast to deliver only 90 dwellings by 2026.

Table 1. Forecast delivery at Policy LNGS1 as set out in previous Annual Monitoring Reports

| Annual Monitoring Report | Forecast Delivery at the 1,800 Home Allocation (Policy LNGS1) | | | | | | | | | |
|-----------------------------|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------------|
| | 2017 / 18 | 2018 / 19 | 2019 / 20 | 2020 / 21 | 2021 / 22 | 2022 / 23 | 2023 / 24 | 2024 / 25 | 2025 / 26 | Total within JCS |
| AMR 2014-15 | 50 | 140 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 1,800 |
| AMR 2015-16 | | 15 | 80 | 130 | 180 | 210 | 210 | 210 | 210 | 1,245 |
| AMR 2016-17 | | | | 35 | 110 | 135 | 135 | 135 | 135 | 685 |
| AMR 2017-18 | | | | 15 | 20 | 20 | 35 | 35 | 35 | 160 |
| AMR 2018-19 | | | | | 15 | 20 | 20 | 110 | 135 | 300 |
| Policy 1 Topic Paper | | | | | | | 30 | 30 | 30 | 90 |

2.5 The table above demonstrates that the partnership has continually made inaccurate delivery assumptions for Policy LNGS1 that are not justified by the evidence. Our analysis below demonstrates that the partnership hasn't yet broken free of their unfounded optimism regarding the delivery of this allocation.

Assessment

- 2.6 The partnerships forecast for the delivery of Policy LNGS1 is contained in the Policy 1 Topic Paper (Ref: DC3.2C) which sets out that the allocation is expected to deliver 1,770 dwellings during the GNL P plan period to 2038. This forecast is based on the assumption that the first homes will be delivered on land west of the A140 in 2023/24, on land to the east of the A140 in 2026/27 and that collectively the allocation will deliver up to 190 dwellings per annum (dpa).
- 2.7 As set out in our hearing statement for Matter 5, the partnership now has a commitment to government funding for 70% of the costs of the bypass, with the remaining 30% to come primarily from developer contributions. This has removed the main hurdle to delivering the site, but it is clear that there are other issues still to be resolved with the planning applications. At the time of writing in February 2022, both applications are still pending determination with a number of objections, most notably from the Local Highways Authority, still to be resolved. A revised submission was made on 24th January 2022 and it remains to be seen if the issues identified have been resolved. There is also the matter of viability still to resolve as Norfolk Homes have submitted a viability appraisal stating that the scheme can only viably deliver 10% affordable housing (as set out in our Matter 5 hearing statement).
- 2.8 It is understood that the Council's forecasts are based on the site achieving planning permission by the end of 2021. This has clearly not happened and given the number of outstanding issues still to be resolved we consider the end of 2022 to be the earliest possible date for approval of the applications. This would push the first homes back by a year meaning that land west of the A140 would commence delivery in 2024/25 and land east of the A140 in 2027/28.
- 2.9 In terms of the forecast build out rate, whilst the Council has split this into the two applications, it is necessary to consider them as one large site as they are both being brought forward by the same housebuilder. In this respect, using Lichfields analysis in Start to Finish (Second Edition)¹, the average build out rate for sites of 1,500-1,999 homes nationally is 120 dwellings per annum(dpa). However, as set out in Lichfield's analysis presented to Matter 2 of this Examination in Public (Ref: E2.19) sites in Greater Norwich deliver more slowly than the national average with sites of 1,000+ dwellings delivering just 80 dpa. There is also good reason why we wouldn't expect Policy LNGS1 to deliver at the average national level as Start to Finish is clear that delivery rates are lowest when there is only 1 sales outlet which is true in this case as the site is being brought forward by a single housebuilder and where the proportion of affordable housing is low which is also true in this case where just 10%

¹ https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf [Accessed 09/02/22]

affordable housing is proposed.. For these reasons a maximum of 80 dpa across the whole allocation is considered to be a reasonable forecast.

- 2.10 Based on the above assessment, we set out below a revised forecast delivery for Policy LNGS1 which is justified by the available evidence.

Table 2. Revised forecast delivery at Policy LNGS1

| | Policy 1 Topic Paper | | Revised Forecast | |
|-----------------------|-----------------------------|---------------------------|-----------------------------|---------------------------|
| | LNGS1 (Part) 1,200 Homes | LNGS1 (Part) 600 Homes | LNGS1 (Part) 1,200 Homes | LNGS1 (Part) 600 Homes |
| 2023/24 | | 30 | | |
| 2024/25 | | 30 | | 30 |
| 2025/26 | | 30 | | 30 |
| 2026/27 | 50 | 40 | | 30 |
| 2027/28 | 75 | 40 | 40 | 40 |
| 2028/29 | 100 | 40 | 40 | 40 |
| 2029/30 | 150 | 40 | 40 | 40 |
| 2030/31 | 150 | 40 | 40 | 40 |
| 2031/32 | 150 | 40 | 40 | 40 |
| 2032/33 | 150 | 40 | 40 | 40 |
| 2033/34 | 150 | 40 | 40 | 40 |
| 2034/35 | 100 | 40 | 40 | 40 |
| 2035/36 | 75 | 40 | 40 | 40 |
| 2036/37 | 50 | 40 | 40 | 40 |
| 2037/38 | 0 | 40 | 40 | 40 |
| Total | 1,200 | 570 | 440 (-760) | 530 (-40) |
| Combined Total | 1,770 | | 970 (-800) | |

Summary and Conclusion

- 2.11 In summary, there is a long track record of the partnership overestimating the deliverability of Policy LNGS1. The issues preventing development on the allocation appear to now be resolving with government funding having been secured for the Long Stratton bypass, but there are still significant issues that remain to be resolved with the 2 planning applications, such that it will be at least another year before consent is granted. This will push back the first completions by a year and following this there is good evidence to suggest that a site in Greater Norwich that is being brought forward by a single housebuilder and that proposes just 10% affordable housing will deliver a maximum of 80 dpa. This more than halves the partnerships forecast delivery rate for the allocation and results in a reduction of 800 dwellings to the total forecast for the plan period.

- 2.12 In conclusion, with respect to the delivery of Policy LNGS1 of the Long Stratton Area Action Plan the delivery assumptions are not justified by evidence. We forecast that 970 dwellings will be delivered on this allocation between April 2020 and 2038. This is 800 fewer than the 1,770 dwellings forecast in the current GNDP trajectory (ref. D3.2C). This would in turn reduce existing commitments across the plan area from 31,452 to 30,652 dwellings.