
**EXAMINATION OF THE GREATER NORWICH LOCAL PLAN
STATEMENT ON BEHALF OF TERRA STRATEGIC – ID 24244
LAND OFF BAWBURGH LANE, COSTESSEY**

MATTER 15 – HOUSING PROVISION

This Statement is made on behalf of Terra Strategic in respect of Land off Bawburgh Lane, Costessey. Terra Strategic control the majority of the site, with the remainder controlled by Norwich City Council, who are supportive of the development proposal and have agreed for Terra Strategic to take the lead with promotion of the Site through the Local Plan process.

The site forms a contingency allocation within the draft GNLP Sites Document as part of Policy GNLP0581/2043. This contingency site allocation is identified on Submission Policies Map – South Norfolk for approximately 800 homes plus other infrastructure including a primary school and sixth form provision.

A Promotional Document is appended to our Matter 2 Statement, which sets out how the site responds its context, and how it could be developed within the Plan period.

QUESTIONS

Does the Plan set out a positively prepared strategy for the supply and deliver of housing development that is justified, effective and consistent with national policy: In particular:

1) Should Table 6 of the Plan be updated to a base-date of 1st April 2021?

1.1 Yes. This would represent a more up to date position on commitments, providing more certainty over housing supply, particularly in the first years of the Plan.

2) Taken as a whole, do any alterations to the site specific delivery assumptions (arising under previous matters) significantly alter the overall housing land supply position?

2.1 We do not propose to go into any detail on site specific matters, particularly before a number of sites have been subject to hearings. However we would reiterate at this stage that East Norwich Strategic Regeneration Area is subject to numerous significant constraints, including restricted

access, flooding, site contamination, local highway capacity, ground conditions / underground constraints, noise, heritage¹, and infrastructure requirements. This is summarised at paragraph 3 of a Report to Norwich City Council Cabinet:

'There are a number of significant challenges to delivery on the East Norwich sites. These include restricted access, flood risk, site contamination and heritage, and the limited capacity of the strategic road network in this part of the city to accommodate significant additional traffic generation. Key infrastructure requirements include roads and bridges, sustainable transport links, green infrastructure, potentially a marina (to justify a fixed bridge over the Wensum), and social / community infrastructure potentially including a new primary school.'²

- 2.2 At this stage insufficient work has been carried out to support the trajectory outlined. As we outline in our response to Matter 2, Issue 2, Question 6, we understand the site has not yet been subject to full Stage 2 work around infrastructure and viability, which is critical to understanding site capacity, infrastructure requirements, lead-in times, phasing and viability. The outcome of the Stage 1 works has already reduced the capacity of the site from 4,000 to 3,469 dwellings, which needs to be reflected in an updated trajectory. This is summarised in the Norwich City Council Report to Cabinet on 17th November 2021, which also notes that '*major upfront infrastructure investment is likely to be required*' (paragraph 30).
- 2.3 The trajectory at [D3.2C] suggests that the East Norwich site will deliver 100 dwellings in 2024/25 and 100 dwellings in 2025/26. Given the scale of the site and its challenges, including around upfront infrastructure, there is insufficient evidence to demonstrate how 200 dwellings will be delivered in this timeframe. The NPPF requires the Plan to be effective with reference to it being deliverable over the plan period. The supply of homes needs to identify specific developable and developable sites. The NPPF Glossary states at page 66 that in order to be considered deliverable:

'sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'

¹ Noting the concerns raised with the allocation from Historic England [E3.19] and [E8.7]

² Report to Norwich City Council Cabinet, 10th June 2020 (Item 7)

2.4 And where a site has outline planning permission:

'it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'

2.5 Beyond five years, the definition of developable is:

'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'

2.6 The Planning Practice Guidance (Paragraph: 007 Reference ID: 68-007-20190722) states:

'Such evidence, to demonstrate deliverability, may include:

- **current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;**
- **firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;**
- **firm progress with site assessment work; or**
- **clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.'**

2.7 It is not clear there is sufficient evidence to demonstrate deliverability or developability. We note that the SoCG with the promoters of the Utilities Site at [D2.2] states:

'In representations submitted to Regulation 18 in March 2020, we expressed that the site has been cleared and is available, suitable and deliverable for

development within years 0-5 of the plan. However, any progression of the site is subject to ensuring that a suitable access arrangement can be funded and viably implemented, or else a longer timeframe would ensue. Whilst in the intervening period there has been no physical progress on site, joint landowners, National Grid and RWE, are in early discussions with Homes England and East Norwich Partnership with a view to agreeing a programme of funding for the necessary new infrastructure which will help to facilitate development. If development can be accelerated, it will be.'

- 2.8 The site is inaccessible and reliant on the Deal Ground site to deliver a spine road and bridge over the river. Whilst we appreciate the Deal Ground / May Gurney site has outline permission and is progressing towards reserved matters, it is unclear whether the permission will be implemented before it expires, and if it is, what are the implications for the apparent uplift of in excess of 500 dwellings from the outline permission versus the draft allocation³. Notwithstanding this, the infrastructure required to unlock the site to the north is significant. The phasing plan and timetable submitted under 21/01369/D (Norwich City Council reference) appears to suggest up to 17 or 18 years to get from pre-commencement of May Gurney to completion of the Wensum Bridge / Spine Road in phase 2. This appears to exclude reserved matters preparation and approval.
- 2.9 We also note that from paragraph 78/79 from the Partnership's Matter 8 Statement [E8.1] that there are three components of the access infrastructure that will require third party land, and that no direct or formal engagement with the landowners on these issues has been undertaken. This may affect the deliverability of Carrow Works and the Deal Ground (and therefore the Utilities Site).
- 2.10 Given the concerns above it would be useful to separate out the trajectory for the various sites comprising the East Norwich allocation.
- 2.11 As we note in our response to Question 4 below, the five year supply calculation should start from the date of the Plan's adoption, rather than 2021/22 as shown in [D3.2C]. This means that even on the basis of the Partnership's questionable trajectory the site will deliver either 0 or 100 dwellings in the first five years of the Plan. We also query the assumed build-out rates of 300 to 500 dwellings per annum from 2028/29. Lichfields' Start to Finish (second edition)

³ As discussed in the Matter 8 hearing

suggests that brownfield sites had longer lead-in periods and lower build-out rates than greenfield sites, and average annual build out rates for schemes of 2,000+ dwellings is 160 dwellings per annum.

- 2.12 Given the likely viability issues we also query the site's contribution towards affordable housing. As we have set out in our other responses, based on historic completions, the Plan is likely to under-deliver on its affordable housing requirement. This may become more apparent in hearings for specific sites, for instance the 1,200 home site at Sprowston was noted by the promoter in the Matter 6 hearing that the site may be unable to meet the 33% affordable housing requirement.

Suggested change

- 2.13 The trajectory should be updated to reflect a reduced capacity for East Norwich, as well as more realistic lead-in and build-out rates. The trajectory should separate out the various East Norwich sites to be able to fully understand each site's contribution.

3) Is it justified to identify contingency sites within the Plan?

- 3.1 Yes. Please see our response to Matter 9, Issue 4. Whilst we consider the site at Costessey should be a full allocation, the principle of a contingency or reserve site is consistent with national policy and has been accepted in recently adopted plans such as North Warwickshire. It will help to provide flexibility within the plan period and therefore certainty over delivery across the Plan period (subject to further consideration over an appropriate trigger mechanism), which given the issues around supply is critical.

4) Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?

- 4.1 Paragraph 74 of the NPPF requires the five year supply to be measured against the housing requirement (as opposed to the housing need where the strategic policies are out of date). The Plan requires modifications to clarify what the housing requirement is.
- 4.2 Planning Practice Guidance requires a five year supply to be demonstrated '*from the intended date of adoption of the plan*' (Paragraph: 004 Reference ID: 68-004-20190722).

4.3 Appendix 6 of the Plan sets out the housing delivery trajectory. This states that:

'the figure of 49,492 is potential housing delivery during the plan period, not the housing need. As stated in table 6, the need is 40,541. The latter will be used to calculate 5-year housing land supply.'

4.4 This does not appear to be consistent with the NPPF in terms of using the housing requirement (subject to clarification from the Partnership). It is also inconsistent with the PPG as the calculations in the trajectory [D3.2C] appear to base the start of the five year calculation in 2021/22, rather than 2022/23 or 2023/24 (subject to confirmation on expected adoption date). For this reason and given the optimistic assumptions around lead-in times and delivery rates, we are concerned that a five year supply will not be achievable at the point of the Plan's adoption.

4.5 This lends weight to the need to make the contingency allocation a full allocation or, at the very least, to amend the triggers.

Suggested change

2.14 The trajectory should be updated to reflect the five year supply date starting from the likely adoption date of the Plan.

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

5.1 We have no specific comments to make.

6) Can the market absorb the number of additional homes envisaged in and around Norwich City Centre? Is this supported by demonstrable evidence?

6.1 We have no specific comments to make, besides noting the evidence from Halsbury Homes around demand for flats and apartments. The Partnership need to respond to this to avoid further issues with supply. If there is any doubt around demand, then it would make sense to ensure the contingency site fulfils its role.

7) Is there compelling evidence that the proposed windfall allowance (of 1,296 dwellings) will provide a reliable source of supply?

7.1 We have no specific comments to make.

8) What confidence is there that the South Norfolk Village Clusters Plan will identify sites for a minimum of 1200 homes and that these sites can be delivered by 2038? Is it appropriate for this to be a minimum requirement?

8.1 We appreciate this is subject to a separate Local Plan process, but flexibility through the contingency site can assist in the event that the Plan is delayed or housing delivery is delayed.

9) What confidence is there that the Diss and area Neighbourhood Plan will identify sites for 250 dwellings and that these sites can be delivered by 2038?

9.1 We have no specific comments to make.

10) Does the Plan identify that at least 10% of the housing requirements will be met from sites no larger than one hectare in accordance with Paragraph 69 of the Framework?

10.1 We have no specific comments to make.