



## **GREATER NORWICH LOCAL PLAN EXAMINATION**

### **Examination Hearing Statement for Matter 9**

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

**February 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 9 – RESIDENTIAL BASED ALLOCATIONS – NEW SITES WITHOUT PLANNING PERMISSION THAT ARE ALLOCATED FOR MORE THAN 500 DWELLINGS**

### **Issue 1 Anglia Square (Ref GNLP0506)**

Is the proposed site allocation soundly based? In particular:

#### **1. Is an assumed site capacity of 800 dwellings justified? How does this relate to the recent refusal of planning permission by the Secretary of state for a higher density mixed use scheme (Ref APP/G2625/V/19/3225505)?**

- 2.1 Following the dismissal of the appeal (which had proposed 1,250 homes), the Part 2 Sites Plan was amended to reduce the capacity of the site from 1,200 homes to 800 homes.
- 2.2 Section D2 - Site Allocation Statements of Common Ground/Delivery Statements, of the Local Plan Examination includes a SoCG dated October 2021 (ref. D2.15). This materially differs from the trajectory – e.g. it refers to a proposal of some 1,100 homes.
- 2.3 Given the dismissal of the appeal proposal for 1,250 homes, there must remain concerns that a proposal of 1,100 homes will fall foul of the same constraints.
- 2.4 Notably, the site promoter themselves have stated in the SoCG that the 800 home figure is:  
  
*"... arbitrary, not having been informed by the necessary technical assessment of impact of a scheme. ..."*
- 2.5 In summary, there is no justification for the 'assumed' site capacity of 800 homes.

**3. Does the evidence support the expected delivery of the housing units 2026/27 – 2031/32? (Document 3.2C)?**

2.6 The latest trajectory (D3.2C) shows the sites as delivering homes as follows:

Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/09	2029/30	2030/31	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038+
Delivery							140	140	140	140	140	100								

2.7 The only justification for this trajectory is seemingly the SoCG, which refers to:  
*"... a very approximate annual delivery rate of approximately 140 dwellings per annum."*

2.8 However, as we note above (Q1) in other respects the SOCG materially differs from the trajectory. Simply on a proportionate basis, if a proposal of 1,100 homes might deliver 140 homes per year, a proposal of just 800 homes might only deliver 100 homes per year.

2.9 We would suggest that in the absence of evidence to justify 140 completions per annum, a rate of 60-70 dwellings per annum, based upon the average build-out rates for schemes of 500-999 dwellings within Lichfields Start to Finish report (February 2020), should be assumed.

2.10 In summary, the evidence does NOT support the delivery of housing as per the expected trajectory.

#### **Issue 4 Costessey Contingency Site (Ref GNLP0581/2043)**

Is the proposed site allocation soundly based? In particular:

##### **1. Is the allocation justified and is it supported by the evidence?**

2.11 The Part 2 Sites Plan proposes this site as:

*"... a contingency site for an urban extension including housing, open and play space, a local centre and education facilities ... [that] could accommodate in the region of 800 homes."*

2.12 Understandably, the latest trajectory does not include the contingency site.

2.13 Generally speaking (and noting the lack of other available detail), a proposal of 800 homes could take 5 years or more from the point an application is submitted to the point where the first homes are completed. In contrast, a proposal of 100 homes will take far less time to progress from the submission of an application to first completions – possibly as little as 2 to 3 years.

2.14 In addition, and again generally speaking, a proposal of 800 homes might only deliver 100 homes per year, possibly less. In contrast, evidence suggests that a site of 100 homes could deliver 25 homes per year, and thus 8 sites of 100 homes could deliver a total of 200 homes per year – double the annual delivery rate.

2.15 Overall, the concept of a contingency site is supported in addressing potential under-delivery; however the proposed contingency site is flawed in being of such a size that it would take longer to start delivering homes and deliver fewer homes per year than could a collection of smaller sites, which would be a far more effective and appropriate method of delivering on the objective.

2.16 This issue is compounded by the fact that the contingency site falls within the Norwich Urban Area, which is already proposed to be the recipient of the majority of the GNLP housing allocations (66% of the total supply 2018-2038). As the requirement for the contingency site is most likely to arise as a result of too much development being focussed in the Norwich Urban Area, it is therefore counter-intuitive to seek to remedy this by releasing a further site within the Norwich Urban Area.

- 2.17 In order to be effective, the GNLP should identify a developable supply that is robust rather than relying upon contingency sites. If having identified a robust supply, there is an under-delivery this should be addressed through an appropriate monitoring framework that would trigger a review of the GNLP. This will then allow sites in appropriate locations to be identified that are capable of addressing any under delivery. For example, if sites within the Norwich Urban Area are not coming forward to due to market saturation, then sites in sustainable locations, outside of the Norwich Urban Area, that are capable of addressing that issue should be identified and allocated.
- 2.18 In summary, the proposed allocation is NOT justified by the evidence.

**5. Is the proposed trigger mechanism for the release of this site justified and effective?**

- 2.19 Policy GNLP0581/2043 states:
- "The site will become an allocation if there are three consecutive years in which Annual Monitoring Reports show that housing completions in Greater Norwich are more than 15% below annual targets in each year and where underdelivery is the result of site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites."*
- 2.20 The Partnership has clarified that the reference to 'annual targets' is a reference to the total figure of 40,550 homes, and thus (presumably) the annual figure of 2,028 homes, as set out in Policy 1.
- 2.21 On this basis the contingency site would be triggered if there were three consecutive years where delivery was less than 85% of that annual average figure – i.e. less than 1,724 homes.
- 2.22 However, it is not clear whether these figures are 'net additional dwellings' or take into account all forms of residential accommodation.
- 2.23 It should be noted that HDT figures show the delivery during 2020-21 of just 1,578 homes, with NAD figures showing delivery of just 1,466 homes. On either of these figures, the first of the three required consecutive years has already occurred.

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- 2.24 In relation to Policy 1 we set out that the housing requirement should be set at c. 49,600 homes – c. 2,480 homes per year. On this basis the contingency site would be triggered if there were three consecutive years where delivery was less than 85% of that annual average figure – i.e. less than 2,108 homes.
- 2.25 In addition to the quantitative aspect of the trigger the qualitative aspect introduces a number of unclear and/or unknown factors as a second strand.
- 2.26 It explains that the trigger will be engaged where under-delivery is the result of:
- site specific constraints (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified), ...
  - ... preventing the delivery of committed and allocated housing sites.
- 2.27 There is no explanation as to how this, subjective, aspect of the trigger would be considered, by who it would be considered, or when. As such it is unclear how or when the site would 'become an allocation'.
- 2.28 In summary, it is considered that the proposed trigger mechanism is neither justified nor will it be effective.