

Greater Norwich Local Plan Examination in Public (Part 2)

Matter 9

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 9 – Residential based allocations – new sites without planning permission that are allocated for more 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 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.

1.0 Issue 1: Anglia Square (Ref GNLP0506)

Q3. Does the evidence support the expected delivery of the housing units 2026/27 – 2031/32? (Document 3.2C)?

1.1 No.

1.2 The Partnership assume delivery rates of 140 dpa for this site which is above local rates as per Table 4 in our Matter 2 (Issue 2) Statement. The SoCG (D2.15) simply states that 140 dpa will be achieved; but it does not provide any evidence to substantiate this (i.e., a phasing plan or delivery strategy). It therefore does not appear the Partnership have critically assessed whether or not that is a realistic figure. We have therefore suggested an amended delivery rate (the rate applied for 1,000+ unit sites as per the SoCG – see D2.15) as more appropriate.

Table 1 Amended Delivery – Anglia Square

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							140	140	140	140	140	100								800
Lichfields							60	60	60	60	60	60	60	60	60	60	60	60	80	720 (-80)

2.0 Issue 2: Land between Fir Covert Road and Reepham Road, Taverham (Ref GNLP0337R)

Q4. Does the evidence support the expected delivery of the housing units 2026/27 – 2036/37? (Document 3.2C)

2.1 No.

2.2 The SOCG (D2.74) for this site notes it is being promoted and is available for development. It also notes that planning application documents are being finalised (albeit to date we can find no application for the development); however, based on timescales in the SoCG the submission of an outline application has been delayed.

2.3 The promotor is assuming a c. three-year lead-in time for a 1,400-unit development with rates peaking at 150. There is no evidence before the examination to justify the trajectory has a realistic prospect of this occurring, such as in the SoCG (which does not appear to have been critically assessed).

2.4 For example, this evidence might include which developer might build out the site (if known); whether it might be disposed to multiple housebuilders; and/or how many outlets might they operate? What level of affordable housing will be delivered? What infrastructure is needed before homes can be occupied? When will the community infrastructure uses be triggered? Is there a piece of large infrastructure that needs to be delivered?

2.5 We have therefore suggested an amendment to the site's lead-in times and delivery rates in accordance with Start to Finish and local averages. We have assumed a 7-year lead-in assuming the application is submitted in 22/23 (i.e., the year the joint plan may be adopted).

2.6 The various iterations of the HELAA and Topic Papers produced offer no additional evidence in support of the housing delivery assumed by the Partnership.

Table 2 Amended Delivery - Land between Fir Covert Road and Reepham Road, Taverham

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	150	150	150	150	150	150	150	150	150	50			1,450
Lichfields							0	0	0	0	80	80	80	80	80	80	80	80	810	640 (-810)

3.0 Issue 3: Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (Ref GNLP0132)

Q5. Does the evidence support the expected delivery of the housing units 2026/27 – 2033/34? (Document 3.2C)

- 3.1 No.
- 3.2 There is currently no signed SoCG for the site and a planning application has not been submitted. The Partnership are assuming a four-year lead in time for a 1,200-unit development with rates at 190 dpa. There is simply no evidence before the examination that justifies such a short lead-in time or high rates for this site against known local rates (see Table 2, Matter 2 Issue 2).
- 3.3 The various iterations of the HELAA and Topic Papers produced offer no additional evidence in support of the housing delivery assumed by the Partnership.
- 3.4 We have therefore suggested an amendment to the trajectory which assumes a 7-year lead-in on the assumption an application is submitted in 22/23 (i.e., the year the joint plan may be adopted).

Table 3 Amended Delivery - Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston

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	190	190	190	190	190	190	10						1,200
Lichfields							0	0	0	0	80	80	80	80	80	80	80	80	560	640 (-560)

Conclusion

- 3.5 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.