

D3.2D Topic Paper - Policy 1 Growth Strategy – Update to Housing Trajectory Tables and Graphs in Appendix 4, September 2022

Contents

| | |
|--|----|
| Background and Context..... | 3 |
| Update on Progress Following the Written Ministerial Statement on Nutrient Levels in River Basin Catchments of 16 th March 2022 | 4 |
| Implications of Nutrient Neutrality for the Delivery of Committed, Allocation and Windfall Sites | 5 |
| Policy 7.5 and the Delivery of Additional Windfall Development | 7 |
| Conclusion on Policy 7.5..... | 8 |
| The South Norfolk Village Cluster Housing Allocation Plan..... | 9 |
| The Housing Trajectory | 9 |
| Delivery Forecasts | 9 |
| Implications of Nutrient Neutrality for Delivery of Homes in the First Five Years of the Plan Period Post Adoption | 12 |
| Delivery on Sites not Affected by Nutrient Neutrality..... | 12 |
| Delivery on Site Affected by Nutrient Neutrality. | 12 |
| Conclusions on Delivery of Homes in the First 5 Years Post-Adoption | 12 |
| Application of a Stepped Housing Requirement/Trajectory | 14 |
| Alternative Distribution Strategies | 14 |
| Conclusion | 15 |
| Appendix A – Approach to Predictions of Long Term Windfall Housing Supply | 16 |
| Approach to Windfall Allowance in the GNLP | 16 |
| GNLP Strategy – Submission Version | 16 |
| GNLP Housing Trajectory submitted in November 2021 (Documents D3.2B and D3.2C) | 17 |
| Inspectors Initial Question October 2021 | 18 |
| Update to windfall in revised trajectory. | 19 |
| Total Windfall Allowance..... | 20 |
| Appendix B - September 2022 Update to Table 4 Housing Trajectory 2018/9 to 2037/38 | 21 |
| Explanatory Text to “Update to Table 4 Housing Trajectory 2018/9 to 2037/38”... .. | 22 |
| Appendix C - August 2022 Proposed GNLP Housing Trajectory 2018/9 to 2037/38 24 | |
| Explanatory Text to Proposed GNLP Housing Trajectory 2018/9 to 2037/38 | 25 |

| | |
|--|----|
| Appendix D - September 2022 Update Graph: Housing Trajectory - Delivery of Greater Norwich's Local Housing Need (LHN) 2018/19 to 2037/38 | 26 |
| Appendix E - August 2022 Update Table: Housing Supply Summary | 27 |
| Appendix F – Housing Land Supply Estimates at 1 April 2023 | 28 |

Background and Context

1. The Regulation 19 submission draft of the Greater Norwich Local Plan (GNLP) ([Document A1](#)) was prepared in late 2020. Table 6 of the GNLP set out how the plan made provision for 49,492 dwellings. This was referred to as the “total housing potential” of the plan. This figure was derived from latest comprehensive housing monitoring information available, which was dated 1 April 2020, and comprised:
 - housing completions during the first two years of the plan, 2018/9 and 2019/20 (5,240 homes);
 - the delivery of the existing housing commitment as at 1 April 2020 (31,452 homes);
 - new allocations proposed in the GNLP (10,704 homes);
 - delivery of small-scale sites of 3 or 5 homes enabled by Policy 7.5 of the GNLP (800 homes total); and,
 - the expected supply of new homes from windfall sites (1,296 homes).
2. A housing trajectory, also based on 1 April 2020 information, was published on 1 October 2021 as document ([D3.2](#)). Further detail on the delivery of individual sites that formed part of the trajectory was set out, at the same time, in document ([D3.2A](#)).
3. An update to Documents [D3.2](#) and [D3.2A](#) was published in November 2021. These updates were contained in documents [D3.2B](#) and [D3.2C](#). These updates took account of monitoring information from 1 April 2021, including recorded completions during the 2020/21 financial year. [D3.2B](#) and [D3.2C](#) formed the basis of discussions at the examination hearings held in February and March 2022.
4. This document provides an update to the following elements of [D3.2B](#)
 - Table 4 Housing trajectory to 2018/9 to 2037/38
 - Graph: Housing Trajectory -- Delivery of Greater Norwich's Housing Requirement 2018/19 to 2037/38
 - Housing Supply Summary
5. Document D3.2E, which is published separately, is an update to document [D3.2C](#). [D3.2](#) is published in 2 parts. Part 1 includes individual site forecasts. Part 2 sets out the Partnership’s rationale for the forecast of each major site.
6. The updates in these documents take account of:
 - i. comprehensive housing monitoring information as of 1 April 2022, including recorded housing completion figures for 2021/22;
 - ii. information about individual sites discussed at the examination hearing sessions in February and March 2022;
 - iii. updated information on delivery provided by developers and site promoters; and,

- iv. assessments of how housing delivery rates may be affected by Natural England's advice of 16 March 2022 on nutrient neutrality.

Update on Progress Following the Written Ministerial Statement on Nutrient Levels in River Basin Catchments of 16th March 2022

7. Following the ministerial advice of 16th March, the Partnership (along with other affected authorities in Norfolk) appointed Royal Haskoning DHV. The purposes of this appointment included:
 - a detailed review of existing catchment mapping to ensure that only sites which genuinely were within a relevant catchment were subject to nutrient neutrality restrictions;
 - preparation of a locally specific nutrient “calculator”, informed by detailed locally specific information to ensure that the need for mitigation is accurately calculated; and,
 - the formulation of short and medium/long term nutrient mitigation solutions.
8. Since the appointment of Royal Haskoning, there have also been further government announcements that are relevant to the impact of nutrient neutrality. Specifically, Government has announced plans for:
 - A new legal duty on water companies in England to upgrade wastewater treatment works by 2030 in ‘nutrient neutrality’ areas to the highest achievable technological levels; and,
 - A new Nutrient Mitigation Scheme established by Natural England, helping wildlife and boosting access to nature by investing in projects like new and expanded wetlands and woodlands. This will allow local planning authorities to grant planning permission for new developments in areas with nutrient pollution issues, providing for the development of sustainable new homes and ensuring building can go ahead. Defra and DLUHC will provide funding to pump prime the scheme.
9. These interventions will have a significant impact on addressing nutrient neutrality issues by: (a) providing increased certainty that sites will be deliverable through the delivery of the Natural England mitigation scheme; and, (b) substantially reducing mitigation burdens after 2030. Furthermore, in their letter to Chief Planning Officers and Local Planning Authorities of 21 July 2022, Government's Chief Planner also foreshadowed changes to planning practice guidance, stating that:

“We will make clear in planning guidance that judgements on deliverability of sites should take account of strategic mitigations schemes and the accelerated timescale for the Natural England's mitigation schemes and immediate benefits on mitigation burdens once legislation requiring water treatment upgrades comes into force” ([Nutrient neutrality and habitats regulations assessment update \(publishing.service.gov.uk\)](#), *Chief Planner, 21 July 2022*)

10. The local nutrient calculator and refined catchment mapping from Royal Haskoning was published on 30 September 2022. Recommendations on a short-term mitigation strategy for Norfolk from Royal Haskoning are currently expected during autumn 2022, with a medium and long term mitigation strategy for Norfolk delivered around the end of the year.
11. In parallel, the Partnership, alongside key stakeholder partners Anglian Water and Water Resources East, are developing proposals to establish an appropriately constituted body that will be able to: (a) deliver mitigation schemes identified in the Royal Haskoning strategies; and, to (b) sell credits to developers. The Partnership consider that there is a realistic prospect that this body could be in a position to be selling nutrient credits as early as Spring 2023.
12. It is also important to recognise that the Norfolk mitigation scheme would operate alongside the Natural England strategic scheme announced by Government and individual mitigations implemented by developers on major strategic sites or strategic solutions delivered by large housebuilders to enable delivery of their portfolio.
13. As such the Norfolk mitigation strategy will not represent the sole mitigation for development in Norfolk. Rather, it will operate as part of a portfolio of mitigations strategies that will operate together to release the full scale of the of development planned on affected sites.

Implications of Nutrient Neutrality for the Delivery of Committed, Allocation and Windfall Sites

14. Nutrient neutrality will affect each of the 3 sources of supply that contribute to the GNLPH Housing Forecasts and Trajectory:
 - Major sites (permissions and allocations) of more than 10 dwellings;
 - Minor committed sites of 9 or fewer dwellings; and,
 - Windfall development.
15. The Partnership has assessed the effect of nutrient neutrality on each of these sources. Reasonable adjustments have then been accounted for in the Partnership's housing supply forecasts. The adjustment varies between different sources, but are considered to be consistent. These adjustments are described in turn below:

Major sites
16. The Partnership has sought to engage with the promoters/developers for all of the major committed sites. Taking account of information provided by promoters/developers, each major site has been considered individually, identifying whether or not the site is constrained by nutrient neutrality and, if it is, delaying expected delivery of a site for 18 months.

17. This has been applied consistently unless: (a) the developer/promoter has indicated a longer delay has been programmed; or, (b) the lead-in timescale for delivery of the site, taking account of any dependency on previous phases of development, is sufficiently long that there is no realistic prospect of nutrient neutrality issues impacting on expected delivery. Records of the discussions held with developers are contained in a series of updated Joint Delivery Statements or officer commentaries of discussions with developers/promoters that are published separately to this document. Where forecasts were simply confirmed by a developer this is referred to in the notes.
18. For development schemes that were due to start in the current monitoring year, or are underway but potentially constrained, this 18month delay has been applied from 1 April 2022.
19. An 18month delay is considered to be a reasonable timescale to allow for mitigation schemes to come into effect and to account for delays in decision making that has taken place as a result of uncertainty created by nutrient neutrality requirements. The delay also allows time for renegotiations to take place on schemes that need to be amended to take account of the impact of nutrient neutrality on scheme layout or viability.

Minor sites

20. The basis of the Partnership's approach to the delivery of small sites, remains as set out in its published [Housing Land Supply Statement](#). For the sake of brevity, an explanation of the approach is not repeated here. The Partnership does however consider it necessary to make a further adjustment to the non-implementation/lapse rate discount that the Partnership applies to smaller sites. This is necessary to account for delays in decision making or other constraints that result from nutrient neutrality.
21. As set out elsewhere, a precautionary delay (in line with paragraph 16) has been applied to individual site forecasts where those sites are affected by nutrient neutrality. A comparative precautionary delay has been applied to the expected delivery of minor sites. For the purposes of minor sites, the Partnership has further discounted delivery from this source by removing the expected contribution from small sites in years 2022/23 and 2023/24.

Windfall development

22. Similarly to the approach on minor sites, the basis of the Partnership's approach to the delivery of windfall in the short term, i.e. the first five years of the plan following adoption, remains as set out in its published [Housing Land Supply Statement](#). For the sake of brevity, an explanation of the approach is not repeated here. The Partnership does however consider it necessary to make an adjustment to the Partnership's stepped approach to windfall supply. This is to account for any delays in decision making and/or the implications for windfall sites as a result of nutrient neutrality.

23. As set out elsewhere, a precautionary delay (in line with paragraph 16) has been applied to individual site forecasts where those sites are affected by nutrient neutrality. A similar precautionary delay has been applied to the expected delivery of windfall. For the purposes of windfall, this delay has been increased to 2 years from 1 April 2022. This reflects the Partnerships inherently prudent approach to forecasting windfall supply. This approach is set out in the table below:

| | | | | |
|---------|---------|---------|---------|---------|
| 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 |
| Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
| 0% | 0% | 33% | 66% | 100% |

24. The longer-term approach to assessing and accounting for the supply of windfall development in the years beyond 2027/28, but not including the additional contribution that is expected to be delivered through the adoption of Policy 7.5, is set out in (Appendix A).

Policy 7.5 and the Delivery of Additional Windfall Development

25. Submitted policy 7.5 was limited to 3 or 5 dwellings per parish within the Plan period. This policy was expected to deliver 800 dwellings. In the Partnership’s view, potential modifications to this policy, following discussions at the hearing sessions, may result in main modifications where development is limited to no more than 3 self/custom build dwellings on sites adjacent to settlement boundaries or within an existing settlement without boundaries.

26. For the purposes of this paper and given the impracticality of a detailed assessment of all potential sites that could come forwards through this revised approach, the Partnership has reassessed the scale of potential growth based on a number of reasonable assumptions linked to potential modifications to the policy.

| Steps in the calculation | Discussion | Assumed result |
|---------------------------------------|---|-----------------|
| Number of settlements with boundaries | Site allocations DPDs indicate around 120 settlements with development boundaries. Several villages have multiple boundaries. Where these boundaries are clearly separated from each other there is the potential for additional sites to come forward. | 120 settlements |

| Steps in the calculation | Discussion | Assumed result |
|---|--|---------------------------------|
| Average number of potential sites per settlement boundary | <p>Assuming that, on average, there are at least 4 road entrances into a settlement, then with a site on each side of the road there are at least 8 potential sites in settlements with a development boundary.</p> <p>Assuming 50% of these sites will be unsuitable, then there could be at least 4 sites per boundary.</p> <p>There will also be an unknown number of other opportunities on back land.</p> | 4 sites per settlement boundary |
| Sites in settlements with no boundary. | There are an unknown number of settlements without boundaries, but for this exercise we can assume 50 settlements with an average of 1 site each. | 50 additional sites |
| Average number of dwellings per site. | The policy allows for up to 3 dwellings per site, so it is reasonable to assume an average of 1.5. | 1.5 dwellings per site |
| | <p>Possible output from sites adjacent to settlement boundaries = $120 \times 4 \times 1.5 = 720$</p> <p>Possible output from sites in settlements without development boundaries = $50 \times 1 \times 1.5 = 75$</p> <p>Total = 795 homes</p> | |

Conclusion on Policy 7.5

27. The actual total delivered will depend on site specific issues, and may be constrained by the demand for self/custom build dwellings and the capacity of the SME building sector. In addition, although Policy 7.5 is opening up new opportunities for development, there may be a limited number of sites that would have come forward as windfall under previous policies and would have contributed to the general windfall allowance. Nonetheless, on the basis of the rationale above, the Partnership considers it reasonable to assume 795 dwellings in the trajectory will be provided through a revised Policy 7.5 in line with the Partnership's expectations. This remains consistent with the initial assessment of potential delivery in connection with Policy 7.5 as currently drafted.

The South Norfolk Village Cluster Housing Allocation Plan

28. The South Norfolk Village Cluster Housing Allocation Plan (VCHAP) is being prepared separately by South Norfolk Council. A Regulation 18 consultation on the VCHAP was undertaken in Summer 2021. The consultation identified sufficient preferred and shortlisted sites to deliver the 1,200 homes proposed within the GNLP.
29. The most recently published version of the Local Development Scheme, which at the time of writing is subject to committee sign-off, estimates publication of the Regulation 19 pre-submission draft of the VCHAP by January 2023 at the latest, with submission planned in June/July 2023 and adoption expected by April 2024.
30. On this basis, and in advance of the final proposed allocation sites being agreed for publication, the GNLP trajectory assumes an annualised rate of delivery of approximately 120 units per year from 2028/29 onwards. This allows approximately 4 years between adoption of the plan and delivery of the first homes on those allocation sites.
31. In reality, it is likely to be the case that developers will bring forward applications that would allow for earlier delivery than assumed here. This is because housebuilders are already promoting, or being engaged, in respect of some of the emerging VCHAP allocation sites. It can be expected, as has happened with GNLP allocations, that some promoters and developers will begin to prepare applications once the certainty afforded by the publication of a Regulation 19 document is achieved. Some of which may even be submitted ahead of the adoption of the plan.

The Housing Trajectory

Delivery Forecasts

32. By applying the above rationale to the individual elements of the housing supply, the results of which are set out updated housing trajectory (Appendix B) and summarised in Figure 1, the following conclusions can be drawn:
- Delivery over the early years of the plan period has exceeded local housing need by approximately 600 units resulting in a reduction of the residual annualised housing need requirement.
 - Assuming proportionate short-term delays to the delivery of sites affected by nutrient neutrality, there is credible evidence that housing delivery could exceed Greater Norwich's objectively assessed need for housing by circa. 14% or circa. 5,800 homes over the plan period.
 - The additional homes identified within the trajectory were included as a delivery buffer. The purpose of this buffer is to mitigate the risk of non-

delivery or slower than expected delivery on identified development sites. As such, even if there were significant further fallout or delays to the implementation of sites, the plan clearly provides flexibility to ensure Greater Norwich's objectively assessed need remains deliverable over the plan period.

- At the other end of the scale, the plan also continues to provide for additional housing capacity on strategic development sites that could mean that even more development than forecast in the base (or “moderated”) supply forecasts would imply. Specifically, the additional housing capacity comprises some 2,955 homes on strategic development, which the base forecast predicts will come forward beyond the plan period.
- In respect of such strategic sites, it is notable that there is no strategic planning impediment, beyond meeting the requirements of a sites own permission, that would prevent such sites being brought forward more quickly if the housing market is sufficiently strong.

Figure 1: Summary of Housing Trajectory

| Source of Supply -- 'Moderated' | New Homes | Source of Supply -- 'Potential' | New Homes |
|--|------------------|---|------------------|
| Housing Requirement 2018/19 to 2037/38 | 40,541 | Housing Requirement 2018/19 to 2037/38 | 40,541 |
| Delivery in 2018/19, 2019/20, 2020/21, 2021/22 | 8,728 | Delivery in 2018/19, 2019/20, 2020/21, 2021/22 | 8,728 |
| Broadland Forecast (2022/23 to 2037/38) | 16,233 | Broadland Forecast (2022/23 to 2037/38) | 19,008 |
| Norwich Forecast (2022/23 to 2037/38) | 8,945 | Norwich Forecast (2022/23 to 2037/38) | 8,945 |
| South Norfolk Forecast (2022/23 to 2037/38) | 9,648 | South Norfolk Forecast (2022/23 to 2037/38) | 9,828 |
| South Norfolk Village Clusters Plan | 1,200 | South Norfolk Village Clusters Plan | 1,200 |
| Policy 7.5 delivery (up to 80 home per year, gradually increasing) | 795 | Policy 7.5 delivery (approximately 85 per annum from 2024/25) | 795 |
| Windfall allowance (approximately 83 per annum from 2028/29) | 830 | Windfall allowance (approximately 83 per annum from 2028/29) | 830 |
| Total Housing -- Moderated Supply | 46,379 | Total Housing -- Potential Supply | 49,335 |

Illustrating the Expected Rate of Housing Delivery in the GNLP Housing Trajectory

33. Paragraph 74 of the NPPF states that:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate for specific sites”.

34. Within document D3.2E (Part 1), the Partnership has set out the anticipated rate of delivery for all identified sites of 10 or more homes where they have planning permission as of 1 April 2022, are allocations within adopted local plans but do not yet have planning permission or are proposed allocations within the GNLP.

35. It is however the case that the overall housing forecasts set out within document D3.2E (Part 1) includes a wider range of sites that provide a “delivery buffer” to ensure that the plan has flexibility in order to ensure that it can meet the area’s objectively assessed need.

36. Therefore, whilst the site-by-site forecast is considered to be a credible assessment of housing delivery based on proportionate evidence, the Partnership considers that the plan trajectory should take a more cautious line that takes account of recent delivery trends alongside the evidence of future delivery provided by the individual site by site forecasts.

37. To achieve this, the cumulative delivery forecast to be achieved across the commitment, allocation and windfall elements of trajectory has been calculated. This total figure is then discounted by a precautionary 10% to account for ‘fallout’ (fluctuations in the market and to ensure the land supply is sufficiently flexible and robust) and then annualised across the remainder of the plan period between 2022/23 and 2037/38’. This equates to the delivery of 2,118 homes per year. This represents a small reduction on, but is broadly similar to, the average of 2,182 per year achieved in the early years of the plan period. This close relationship between recent delivery and future forecasts adds credibility to the proposed trajectory. It also represents a significant uplift over the longer-term delivery trends of circa. 1,680 homes achieved over the period 08/09 to 2020/21 (Average delivery has been calculated on the basis of Joint Core Strategy monitoring data, this does not include the delivery equivalent dwellings from student accommodation), thereby being consistent with Government’s objective of significant boosting the supply of homes. Delivery at this rate would also be notably above the annualised housing requirement of 1,988 homes as of 1 April 2022.

38. This approach is considered a realistic forecast of what is likely to be delivered and, if achieved would result in 42,614 homes being delivered over the whole of the plan period, over-delivering against the plan requirement by circa.2,050 homes.

Implications of Nutrient Neutrality for Delivery of Homes in the First Five Years of the Plan Period Post Adoption

Delivery on Sites not Affected by Nutrient Neutrality

39. Not all housing development is affected by Nutrient Neutrality. This can be because a site lies outside an affected catchment (as is the base for locations such as Acle, Diss and Loddon), because a site has all the relevant planning permissions in place and has discharged all relevant conditions prior to Natural England's advice on the 16th March 2022, or because the outstanding consents or requirements to discharge conditions are not constrained by the Habitat Regulations.
40. The individual site forecasts included in Document D3.2E identifies those sites that are not constrained by nutrient neutrality, the are rated as Green in the RAG assessment within those tables. Considering the "Green" sites of 10 or more homes in isolation, the Partnership calculates that there are 10,760 homes with permission or currently allocated across Greater Norwich that are not constrained by nutrient neutrality, of which 5,823 homes could realistically be delivered over the first five years of the plan period (an average of circa 1,160 homes per year), from 1 April 2023 to 31 March 2028. This alone is more than half of the homes that would be required (9,973, or 1,995 per year) for the period 1 April 2023 to 31 March 2028, calculated on the basis of the forecast position at 1 April 2023.

Delivery on Site Affected by Nutrient Neutrality.

41. If sites affected by nutrient neutrality and future windfall is factored in, taking account of realistic estimates of delays as set out in paragraphs 14 to 24, then this 5 year supply increases substantially to 13,273 dwellings. This is equivalent to a 6.05 year housing land supply, when measured against the plan's housing requirement of 1,995 homes per year, as per forecast position at 1 April 2023.

Conclusions on Delivery of Homes in the First 5 Years Post-Adoption

42. In the Partnership's view, the clear progress that is being made towards identifying mitigation solutions to address nutrient neutrality, as outlined in paragraphs 7 to 13, should be given significant weight in the assessment of the deliverability of sites for the purposes of Plan Making. In the Partnership's view these are the exact type of strategic mitigation schemes the Chief Planner refers to in their letter of 21 July 2022 and should, as set out in that letter, be taken into account in the assessment of the deliverability of sites.
43. The Partnership considers that consequently there would be, based on current figures, a clear justification to confirm a housing land supply of circa 6.05 years on adoption of the plan for the period 1 April 2023 to 31 March 2028.
44. Notwithstanding the above, the Partnership does however recognise that the updates to the Planning Practice Guidance referred to by the Chief Planner have not yet been put in place. Also, that in other circumstances the current level of

uncertainty in respect of the availability, timing and cost of mitigation in advance of the publication of the Norfolk and Natural England mitigations strategies and the site-specific mitigation being developed by individual site promoters for affected sites would likely lead to the conclusion that these sites could not be considered deliverable.

45. Should the Inspectors take this view then the Partnership considers that there are two possible solutions that would enable the plan to be found sound.

Progress without Confirming a 5 Year Housing Land Supply on Adoption of the Plan

46. The first option would simply to progress to the adoption of the plan irrespective of the ability to find or confirm a five year's supply of land for housing. In this respect, Paragraph 68 of the NPPF sets out that:

“Planning Policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period ...”

47. However, paragraph 68 does not say that authorities must identify such a supply or that they must have it confirmed. The circumstance that the Greater Norwich Authorities find themselves in respect of nutrient neutrality is in no way of their own making. Indeed prior to the submission of the plan the authorities had prepared, in consultation with the relevant environmental bodies, both a Water Cycle Study and a Habitat Regulations Assessment, which specifically looked at the capacity for waste water disposal and assessed the impact of the plan on protected Habitat sites. The water cycle study finding specifically that:

“The assessment has shown that subject to the revision of discharge permits and the implementation of the necessary treatment process upgrades (using conventional treatment technologies), changes in water quality as a result of additional discharge can be managed to ensure there is no overall increase in pollutant load, and no adverse change in water quality or connected water dependent ecologically protected sites as a result of growth.”

(Document B27.4, Greater Norwich Water Cycle Study (Final March 2021), March 2021, Aecom, page 5).

48. The Partnership had also been successful in increasing the delivery and supply of homes. It has exceeded the Housing Delivery Test significantly in each year that this measure has been published and has provided clear evidence of a demonstrable 5-year housing land supply, a fact that was confirmed through a planning appeal hearing at Becket's Grove, Wymondham (Ref. APP/L2630/W/20/3256206), 28 June 2021. On this basis the Partnership considers it would be highly unfair to find its plan unsound on the basis of factors outside of its control and when it had taken all reasonable and proportionate steps in its preparation, and when other options are available.

49. Furthermore, the Partnership is resolute in its view that the adoption of the GNLP, and the certainty it will bring to allocated development sites, remains clearly the

most effective way to achieve government's ambition of "significantly boosting the supply of land for housing", and ensure the area meets its objectively assessed need for homes.

Application of a Stepped Housing Requirement/Trajectory

50. The other alternative would be to apply a stepped housing requirement within the plan, reflecting the level of development that could be achieved on major sites within the plan that are not constrained by nutrient neutrality, but still allowing for the cautious discounted rates of delivery on small sites and windfall development.
51. If considering the application of a stepped housing requirement/trajectory, the Partnership recommends that a lower flat rate requirement is set for the first five years post adoption with a larger flat rate target for the remaining 10 years of the plan period.
52. In order to ensure that such a restriction is proportionate, the partnership would recommend that the requirement for years 0 to 5 (2022/23 to 2027/28) is set at 1,150 home per year, and at 2,491 for the remainder of the plan period. This would ensure that the residual housing requirement of 31,813 at 1 April 2022 continues to be met over the remainder of the plan period.
53. This approach would provide a housing land supply of circa 5.46 years as of 1 April 2023, based upon the approach outline in paragraph 50. The change towards a higher requirement in years 6-15 would also, over time, result in a gradual increase the rolling 5-year requirement in sequential housing land supply assessments as more years of the higher requirement fall within the 5-year period.
54. Should a stepped requirement/trajectory be applied to the GNLP, it needs to be recognised that there would be the strong likelihood that nutrient neutrality constraints will be overcome earlier than would be implied by the stepped trajectory. As such, the Partnership thinks it likely that it would achieve a surplus of housing in the early years of the plan. It is important to ensure that the policies of the GNLP make clear that any surplus delivery over the early years of the plan period should be offset against the housing requirements later in the plan period. This will ensure that there are clear rewards to enabling early delivery.

Alternative Distribution Strategies

55. In other circumstances it may have been appropriate to consider whether an alternative distribution of homes would help overcome a short-term issue of supply.
56. However, given the scale of the unaffected site deficit and limited areas within Greater Norwich that lie outside the affected catchments, it is not considered that the substantial, but ultimately short-term, interruption to housing delivery is proportionate justification to reconsider the strategy in this way.

Conclusion

57. The Partnership considers that the updated evidence on housing supply within this and associated documents clearly demonstrates that the plan is deliverable over its plan period.
58. The Partnership is also of the view that significant weight should be given to Government's announcements/commitments in respect of nutrient neutrality, the changes to Planning Practice Guidance foreshadowed by the Chief Planner and the progress being made with Norfolk's mitigation strategy. As such, the Partnership is of the view that it is possible to conclude, on the basis of current evidence, that there would be a circa 6.05 year housing land supply as of 1 April 2023 on adoption of the plan.
59. The partnership is also of the view that its revised approach to the Plan's housing trajectory represents the most sensible and pragmatic approach to the illustration of a trajectory within a strategic plan of this nature.
60. The Modifications to the GNLP resulting from the updated housing trajectory would be as follows:
 - i. Update policy 1 including update and revision to Table 6
 - ii. Update to figures in policies 7.1 to 7.4

Appendix A – Approach to Predictions of Long Term Windfall Housing Supply

Approach to Windfall Allowance in the GNLP

1. A small proportion of expected future windfall housing development is included in the GNLPs housing figures. In producing the current update of the housing Trajectory, it has become apparent that there has been a discrepancy between the way the allowance has been calculated and explained across various documents. This paper explains these differences and provides an up-to-date assessment for discussion at the hearing and inclusion in the GNLP.

GNLP Strategy – Submission Version

2. Table 6 in the submitted version of the GNLP Strategy ([A1](#)) breaks down the Plan’s total housing potential. Row F of Table 6 sets out the windfall allowance. The explanation states: *There is a limited reliance on windfall sites. Evidence provides an estimated 4,450 homes resulting from windfall development during the remainder of the plan period. As windfall delivery is likely to remain robustly high it is appropriate to include a limited proportion as part of total potential delivery.*
3. The figure of 1,296 dwellings is attributed to windfall allowance for the then remaining 18 years of the plan period.
4. The figure in Table 6 Row F was calculated using the *discounted windfall per annum* calculation method set out in the [AMR](#) (page 9).
5. The approach is very cautious as the historic data excludes windfall sites of 10+ dwellings in Broadland and South Norfolk, applies a 33% reduction to past rates of delivery. The analysis of past rates calculated an average of 416 dwellings per year. The 33% discount is then applied (416×0.67) = 279. A stepped approach for the first 3 years of the forecast is utilised i.e.

| Year 1 | Year 2 | Year 3 | Year 4 | Year 5 |
|--------|--------|--------|--------|--------|
| 0% | 33% | 66% | 100% | 100% |

6. Consequently, for the plan period the calculation used to inform Table 6 was as follows:
 - 2018/19 delivery already monitored = 0 windfall (counted in delivery)
 - 2019/20 delivery already monitored = 0 windfall (counted in delivery)
 - 2020/21 first year of 5yls 0% = 0 windfall
 - 2021/22 2nd year of 5yls 33% $279 \times 0.33 = 92$ windfall
 - 2022/23 3rd year of 5yls 66% $279 \times 0.66 = 184$ windfall
 - 2023/24 to 2037/38 (remaining 15 years of the plan at 100% of the 33% discounted rate) $279 \times 15 = 4,181$
 - Total = $92 + 184 + 4,181 = 4,457$
7. Page 33 of the Growth Strategy Topic Paper ([D3.1](#)) includes a copy of Table 6 as included in the Regulation 19 plan. The discounted windfall of 4,457 was

further reduced by around 70% and entered in row F of Table 6 as 1,360. This very significant reduction prevents over reliance on windfall, provides a high level of caution for the longer term which militates against any double counting with other sources of supply whilst providing flexibility to recognise that if the market delivers windfall development this reflects demand. Before submission some minor modifications were made to Table 6 to correct and update the existing commitment and new allocation values in rows C and D. As a result, the windfall allowance was reduced from 1,360 to 1,296 to ensure that the Total Housing Potential that carries forward into Policy1 remained at the Regulation 19 value of 49,492 homes.

GNLP Housing Trajectory submitted in November 2021 (Documents D3.2B and D3.2C)

8. Housing trajectories change through time as more up-to-date data becomes available. The updated Housing Delivery Trajectory submitted in November 2021 was derived from the separately published AMR 5 Year Land Supply calculation with the addition of the new GNLP allocations and extended to include subsequent years of the plan. The windfall element of the 5 Year Land Supply has been tested at appeal and judged to be realistic and appropriate (paragraphs 75-76 of [D1.4B](#)). To ensure consistency, the windfall allowance from the 5 Year land Supply for the years 2020/21 to 2024/25 was retained in the GNLP housing trajectory and is included in the “Forecast” row for each district. For the remaining 13 years of the plan the 1,296 from Table 6 was distributed evenly.

9. This was calculated as follows:

| Year | As submitted | Figure |
|-------------|--|---------------|
| 2018/19 | Delivery (including windfall) | 0 |
| 2019/20 | Delivery (including windfall) | 0 |
| 2020/21 | 0% of 276 (as per 5-year land supply calculation) | 0 |
| 2021/22 | 33% of 276 (as per 5-year land supply calculation) | 89 |
| 2022/23 | 66% of 276 (as per 5-year land supply calculation) | 184 |
| 2023/24 | 100% of 276 (as per 5-year land supply calculation) | 276 |
| 2024/25 | 100% of 276 (as per 5-year land supply calculation) | 276 |
| 2025/26 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2026/27 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2027/28 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |

| | | |
|------------|--|--------------|
| 2028/29 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2029/30 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2030/31 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2031/32 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2032/33 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2033/34 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2034/35 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2035/36 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2036/37 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 100 |
| 2037/38 | 1,296 from Table 6, row F dispersed equally over the remaining 13 years of the plan (approximately 100 per annum). | 96 |
| n/a | Total Windfall | 2,121 |

Inspectors Initial Question October 2021

10. Question 17 ([D1.4A](#) pp16-17) of the Inspectors Initial Questions asked: Can we be directed to the evidence which supports the assumed windfall contribution?

11. The GNLP response explaining the derivation of the windfall allowance in GNLP Table 6 was:

The GNLP's assumed windfall contribution is derived from the evidence in the latest Housing Land Supply Assessment in Appendix A (Part 1) of the Annual Monitoring Report 2019-20. This explains how the contribution of windfall development is assessed in paragraphs 26 to 40. The calculation of past rates is tabulated separately on page 146 of the Windfall assessment summary which is referred to in the Housing Land Supply Assessment as Appendix D1. The lapse rates referred to in the assessment are tabulated in Appendix D2.

The assessment looks at the 10-year period 2008/9 to 2017/18. Based on these past rates the total annual average windfall across the three districts is expected to be

414 dwellings per year. The analysis is generally cautious and to further ensure no over-counting the Housing Land Supply windfall allowance reduces the past rates by 33% to 276 dwellings per year (totals from the penultimate row of each of the tables at the end of the Housing Land Supply assessment on pages 18, 22 and 26 in Appendices B1-B3). The contribution is also tapered in the first three years of the assessment period as explained in paragraph 34 of the Housing Land Supply Assessment.

Taking this approach, the windfall contribution to provision in the period between 2020 and 2038 is 0 in year one, 87 in year two, 184 in year three and 276 for the remaining years. This totals 4,411 dwellings.

The submission GNLP figure of “in the region of 4,450 dwellings” was based on draft analysis which indicated a past average of 416 dwellings per year, 2 dwellings a year higher than the published Housing Land Supply Assessment. As only 30% of the total is included in GNLP housing provision, the difference between these two figures is inconsequential.

12. This explanation is largely correct in relation to the windfall allowance in submitted Table 6, but it has now become apparent that it is incomplete.
- It did not explain the small reduction of the windfall allowance in the submission version of Table 6 (discussed in paragraph 7 above)
 - It did not highlight that the trajectories in [D3.2B](#) and [D3.2C](#) incorporated the 5 Year Land Supply derived windfall allowance for the years 2020/21 to 2024/25 within the “Forecast” rows of D3.2B and in the “Discounted Windfall” rows of D3.2C.
 - It did not recognise that incorporating the allowance from the 5 Year Land Supply for the first five years of the forecast required either a recalculation and reduction of the 1,296 total for the remaining years or clarity on what proportion of the total calculated windfall this represents.

Update to windfall in revised trajectory.

13. While there has been some inconsistency and minor errors in counting and forecasting of windfall in the GNLP, the impact of this is moderated by the heavily discounted and cautious rates used in all estimates.

14. In moving forward, the two key elements that should inform the allowance are:
- a. Consistency with the windfall allowance in the 5 Year Land Supply; an approach that has been supported at appeal. For clarity the figure of 276 used below is calculated as follows, based on figures presented on pages 146-148 of appendix [A\(5\)](#) of the Annual Monitoring Report 2019-20 ‘windfall assessment summary’:

i.

| District | Annual Average | Apply 33% discount | Discounted windfall per annum |
|---------------|----------------|--------------------|-------------------------------|
| Broadland | 90 | 90 x 0.67 | 60 |
| Norwich | 193 | 193 x 0.67 | 129 |
| South Norfolk | 131 | 131 x 0.67 | 87 |
| Total | 414 | n/a | 276 |

- b. Continuing to apply a further 70% reduction for the remaining years of the Plan. As set out at paragraph 7, this very significant reduction maintains the high level of caution for the longer term which militates against any double counting with other sources of supply, and accounts for the greater uncertainty of forecasting windfall over the whole plan period.

Total Windfall Allowance

| Year | Proportion | Figure |
|------------|---|--------------|
| 2018/19 | Delivery (including windfall) | 0 |
| 2019/20 | Delivery (including windfall) | 0 |
| 2020/21 | Delivery (including windfall) | 0 |
| 2021/22 | Delivery (including windfall) | 0 |
| 2022/23 | 0% of 276 (as per 5-year land supply calculation) | 0 |
| 2023/24 | 0% of 276 (as per 5-year land supply calculation) | 0 |
| 2024/25 | 0% of 276 (as per 5-year land supply calculation) | 0 |
| 2025/26 | 33% of 276 (as per 5-year land supply calculation) | 89 |
| 2026/27 | 66% of 276 (as per 5-year land supply calculation) | 184 |
| 2027/28 | 100% of 276 (as per 5-year land supply calculation) | 276 |
| 2028/29 | 30% of 276 = 83 per annum | 83 |
| 2029/30 | 30% of 276 = 83 per annum | 83 |
| 2030/31 | 30% of 276 = 83 per annum | 83 |
| 2031/32 | 30% of 276 = 83 per annum | 83 |
| 2032/33 | 30% of 276 = 83 per annum | 83 |
| 2033/34 | 30% of 276 = 83 per annum | 83 |
| 2034/35 | 30% of 276 = 83 per annum | 83 |
| 2035/36 | 30% of 276 = 83 per annum | 83 |
| 2036/37 | 30% of 276 = 83 per annum | 83 |
| 2037/38 | 30% of 276 = 83 per annum | 83 |
| n/a | Total | 1,379 |

15. The proposed figure of 1,379 is 742 dwellings less than the 2,121 windfall in the trajectory submitted in November 2021; it is 83 more than the 1,296 in table 6 of the submitted strategy.

Appendix B - September 2022 Update to Table 4 Housing Trajectory 2018/9 to 2037/38

The table below details the calculated housing requirement over the plan period and provides the annual housing delivery forecast to meet this requirement. The total housing requirement to 2037/38 is 40,541. The total moderated housing supply for the plan is 46,379. If all sites come forward in their entirety in the plan period, there is a total potential housing supply of 49,334. There is further row by row explanation of the contents of this table under 'explanatory text to Update to Table 4 Housing Trajectory 2018/19 to 2037/38'.

| | 18/19 | 19/20 | 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 | Total |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|-------|-------|-------|--------|--------|--------|--------|--------|
| Managed Annual Housing Requirement Taking Account of Past/Projected Completions | 2,027 | 1,979 | 1,961 | 1,982 | 1,988 | 1,995 | 1,980 | 1,943 | 1,872 | 1,758 | 1,661 | 1,508 | 1,305 | 1,052 | 794 | 504 | 104 | -483 | -1,627 | -4,678 | |
| Housing Requirement to 2037/38 | 40,541 | 37,605 | 35,301 | 33,699 | 31,813 | 29,918 | 27,716 | 25,260 | 22,465 | 19,340 | 16,605 | 13,572 | 10,438 | 7,366 | 4,764 | 2,519 | 416 | -1,450 | -3,254 | -4,678 | |
| Housing Delivery | 2,936 | 2,304 | 1,602 | 1,886 | | | | | | | | | | | | | | | | | |
| Broadland Forecast | | | | | 905 | 734 | 877 | 971 | 1,028 | 1,141 | 1,182 | 1,209 | 1,168 | 1,156 | 1,057 | 1,135 | 1,092 | 1,112 | 845 | 621 | 16,233 |
| Norwich Forecast | | | | | 212 | 596 | 564 | 632 | 1,026 | 776 | 784 | 815 | 920 | 684 | 541 | 426 | 298 | 304 | 191 | 176 | 8,945 |
| South Norfolk Forecast | | | | | 778 | 872 | 1,015 | 1,187 | 1,061 | 793 | 814 | 842 | 701 | 479 | 364 | 259 | 193 | 105 | 105 | 80 | 9,648 |
| Sub-total (Greater Norwich Forecast) | | | | | 1,895 | 2,202 | 2,456 | 2,790 | 3,115 | 2,710 | 2,780 | 2,866 | 2,789 | 2,319 | 1,962 | 1,820 | 1,583 | 1,521 | 1,141 | 877 | 34,826 |
| South Norfolk Village Clusters Plan | | | | | | | | | | | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 120 | 1,200 |
| Policy 7.5 delivery (building to approximately 80 per annum from 2030/31) | | | | | | | | 5 | 10 | 25 | 50 | 65 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 795 |
| Windfall allowance (approximately 83 per annum from 2028/29) | | | | | | | | | | | 83 | 83 | 83 | 83 | 83 | 83 | 83 | 83 | 83 | 83 | 830 |
| Annual Total Housing Supply ('Moderated') | 2,936 | 2,304 | 1,602 | 1,886 | 1,895 | 2,202 | 2,456 | 2,795 | 3,125 | 2,735 | 3,033 | 3,134 | 3,072 | 2,602 | 2,245 | 2,103 | 1,866 | 1,804 | 1,424 | 1,160 | 46,379 |
| Annual Total Housing Supply ('Total Potential') | 2,936 | 2,304 | 1,602 | 1,886 | 1,895 | 2,202 | 2,456 | 2,795 | 3,125 | 2,735 | 3,171 | 3,447 | 3,385 | 2,915 | 2,558 | 2,416 | 2,179 | 2,117 | 1,737 | 1,473 | 49,334 |
| Remaining Greater Norwich Requirement to 2037/38 | 37,605 | 35,301 | 33,699 | 31,813 | 29,918 | 27,716 | 25,260 | 22,465 | 19,340 | 16,605 | 13,572 | 10,438 | 7,366 | 4,764 | 2,519 | 416 | -1,450 | -3,254 | -4,678 | -5,838 | |

Explanatory Text to “Update to Table 4 Housing Trajectory 2018/9 to 2037/38”

| Row Heading | Row content |
|--|--|
| Managed Trajectory - Annual Housing Requirement Taking Account of Past/Projected Completions | <p>The first cell in this row (year 18/19) contains the annual housing requirement for the plan, established using the standard methodology calculation.</p> <p>Subsequent cells (years 19/20 – 37/38) show a calculated annual housing requirement taking into account delivery or forecast delivery of the previous year.</p> <p>The calculation in this row is the remaining 'Housing Requirement' at the start of the year divided by the number of remaining years of the plan. (i.e. the calculation for 23/24 is $29,965 / 15 = 1,998$)</p> |
| Housing Requirement to 2037/38 | <p>It is important to note that this figure is as of 1st April at the commencement of the monitoring year.</p> <p>The figure in the first cell is the total Local Housing Need for the plan period from 2018 to 2038, calculated using the standard methodology which is the Housing Requirement for the GNLP.</p> <p>For the years 2019/20 to 2022/23 the annual delivery from the previous year is subtracted from the previous total. (i.e. the calculation for 19/20 is $40,541 - 2,936 = 37,605$).</p> <p>For the years 2023/24 to 2037/38 the 'Annual Total Housing Supply (Moderated)' of the previous year is subtracted from the previous year's Housing Requirement figure. (i.e. the calculation for 23/24 is $31,813 - 1,848 = 29,965$)</p> |
| Delivery | This is the delivery as reported in the Annual Monitoring reports for the years 2018/19, 2019/20, 2020/21, 2021/22. |
| Broadland Forecast | <p>This is the annual total forecast delivery taken from the row titled 'moderated supply – including windfall' in the 'Broadland Forecast' table, this includes:</p> <ul style="list-style-type: none"> • Delivery forecast on allocations and consented commitment for sites of 10 and above. • An annual average for delivery of consented sites of 9 or fewer (for the years 2022/23 – 2026/27), The Greater Norwich authorities have assumed that all sites of 9 or fewer will be delivered over the 5-year period at an average annualised rate. However, this is subject to a lapse/non-implementation rate discount of 27%, in accordance with the finding set out in appendix D2 of the AMR. (See Appendix D2–Lapse Rate Study Summary on page 35.) • Discounted windfall per annum for the years 2023/24 to 2027/28 (calculation informed by the method set out in the AMR (pages 6 to 10)) |
| Norwich Forecast | This is the annual forecast delivery taken from the row titled 'moderated supply – including windfall' in the 'Norwich Forecast' tab this includes delivery forecast for allocations and consented commitment for sites of 10 and above. As set out above in the Broadland Forecast, this also includes an annual average for delivery of consented sites of 9 or fewer for Norwich and discounted windfall per annum for Norwich. |
| South Norfolk Forecast | This is the annual forecast delivery taken from the 'SNC Forecast' tab this includes delivery forecast for allocations and consented commitment for sites of 10 and above. As set out above in the Broadland Forecast, this also includes an annual average for delivery of consented sites of 9 or fewer for South Norfolk and discounted windfall per annum for South Norfolk. |
| Sub-total (Greater Norwich Forecast) | The sum of the annual forecast delivery in the rows 'Broadland Forecast', 'Norwich Forecast' and 'South Norfolk Forecast' (For the years 2022/23 – 2037/38 as earlier years have confirmed delivery & therefore they are not forecast). |
| South Norfolk Village Clusters Plan | As set out in The GNLP Pre Submission Draft Strategy at paragraph 32 South Norfolk District Council Village Clusters Housing Allocations Local Plan is to allocate a minimum of 1,200 additional homes to contribute to meeting the Housing Requirement. This row averages out the delivery of these homes between 2028/29 – 2037/38 At a rate of 120 d.p.a |
| Policy 7.5 delivery (approximately 57 per annum from 2024/25) | Policy 7.5 provides for delivery of homes on small scale sites adjacent to settlement boundaries or on small sites. For the sake of forecasting, this has been estimated to result in the development of approximately 800 dwellings over the remaining plan period |
| Windfall allowance | <p>Annual discounted Windfall per annum is calculated in the five-year land supply as part of the annual monitoring report.</p> <ul style="list-style-type: none"> • For consistency of forecasting the 5yrs rates at individual district level are counted within the 5yrs supply period in the housing trajectory for the years 2022/23 – 2027/28 • Following this a further discounted standardised windfall rate is used in forecasting for the combined districts for the remainder of the plan period, this has been calculated at 83 dwellings per annum for the years 2028/29 – 2037/38. |
| Annual Total Housing Supply ('Moderated') | This is the forecast total annual delivery. It should be noted that this is the 'moderated' supply reflects which are expected to commence within the plan period, but not fully complete all phases before 2038. A breakdown of what is included each year is as follows: |

| | |
|--|---|
| | <ul style="list-style-type: none"> • For the years 2018/19, 2019/20, 2020/21, 2021/22 the figures used are the combined housing completions totals for the Greater Norwich Authorities, this figure includes delivery of Institutional development at the appropriate ratio (PBSA, C2 residential care homes). • For the years 2022/23, 2023/24 this is the combined total forecast delivery for the Greater Norwich Authorities only, with no additional delivery factored in. • For the years 2025/26 – 2027/28 this is the combined total forecast delivery for the Greater Norwich Authorities with the addition of average forecast delivery resulting from policy 7.5 • For the years 2028/29 – 2037/38 this is the combined total forecast delivery for the Greater Norwich Authorities with the addition of delivery in the South Norfolk Village Clusters Plan and average forecast delivery resulting from policy 7.5. As the 5yrs windfall allowance is no longer factored in at this point, the further discounted windfall allowance described above is added. |
| Annual Total Housing Supply ('Total Potential') | <p>This is the same as the above row, with the addition of 'additional potential supply if all sites completed by 2038 on the basis that there is no planning restriction that would allow these sites to delivery more quickly should the housing market be sufficiently strong.</p> <ul style="list-style-type: none"> • For Broadland this assumes full delivery of Beeston Park and North Rackheath. • For South Norfolk this assumes completion of Long Stratton AAP sites by 2038. • There is no additional potential supply related to Norwich, full housing potential is expected to be delivered in the plan period. |
| Remaining Greater Norwich Requirement to 2037/38 | <p>It is important to note that this is 'at year end' of the monitoring year which is 31st March.</p> <p>The calculation is the annual figure from the row 'Housing requirement to 2037/38' with the 'Annual Total Housing Supply (Moderated)' subtracted from the total. i.e. for 19/20: 37,605 - 2,304 = 35,301</p> <p>For the years 2018/19 to 2021/22 the 'Annual Total Housing Supply (Moderated)' figure is the monitored delivered housing, For the years 2022/23 to 2037/38 the 'Annual Total Housing Supply (Moderated)' is forecasted deliverable housing.</p> |

Appendix C - August 2022 Proposed GNLPH Housing Trajectory 2018/9 to 2037/38

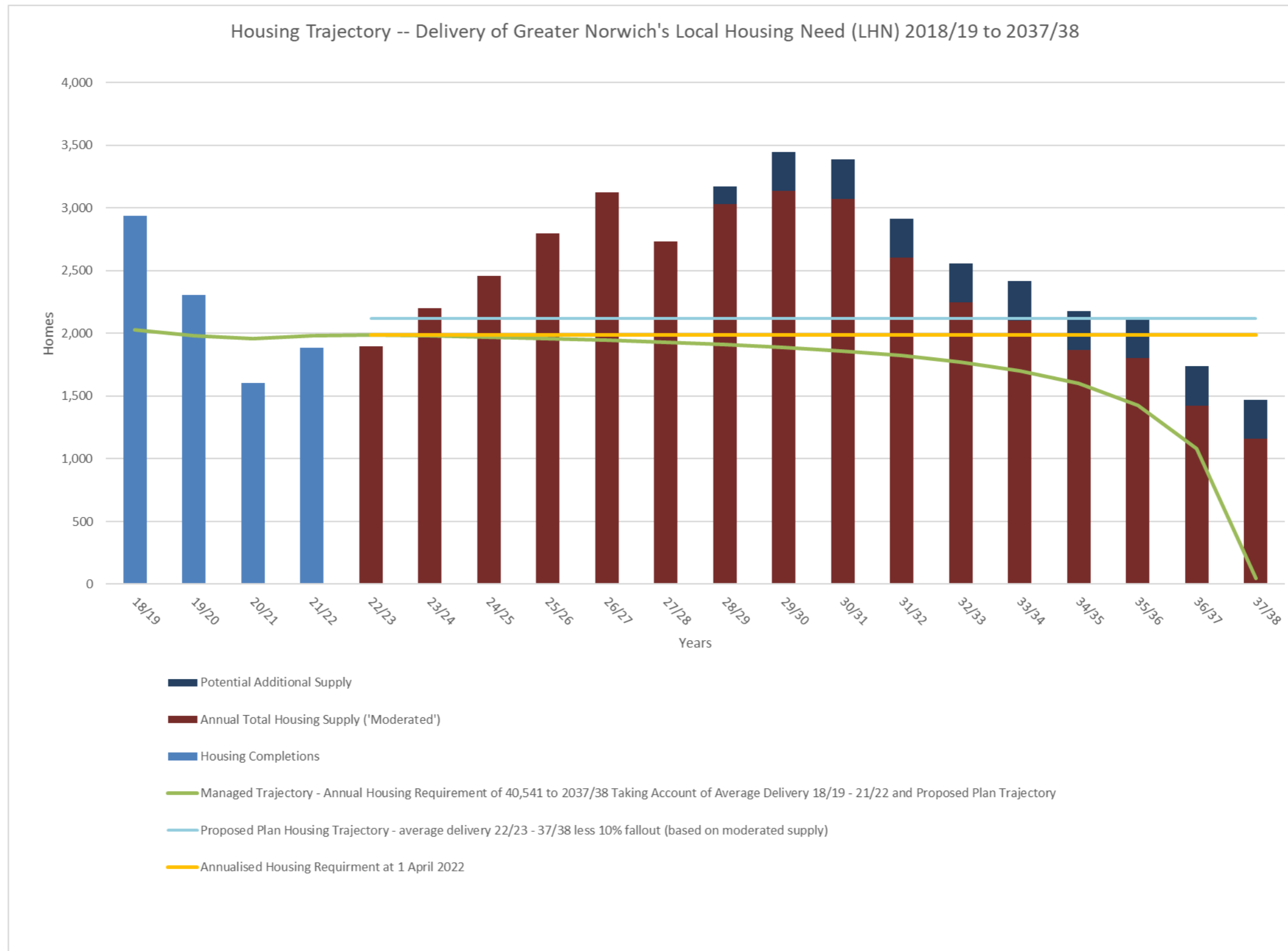
The table below provides the data for the graph in appendix D of this document. It shows that 8,728 homes were delivered in the period 2018/19 to 2021/22 against a requirement of 8,108 in that period. There is total remaining moderated supply of 33,886 for the period 2022/23 to 2037/38 for the remaining housing requirement of 31,813. There is further row by row explanation of the contents of this table below under 'explanatory text to Proposed GNLPH Housing Trajectory 2018/19 to 2037/38'.

| | 18/19 | 19/20 | 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 | Total |
|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|-------|-------|-------|-------|-------|--------|
| Managed Trajectory - Annual Housing Requirement of 40,541 to 2037/38 Taking Account of Average Delivery 18/19 - 21/22 and Proposed Plan Trajectory | 2,027 | 1,979 | 1,961 | 1,982 | 1,988 | 1,980 | 1,970 | 1,958 | 1,945 | 1,929 | 1,911 | 1,888 | 1,859 | 1,822 | 1,772 | 1,703 | 1,600 | 1,427 | 1,081 | 45 | |
| Housing Requirement to 2037/38 | 40,541 | 37,605 | 35,301 | 33,699 | 31,813 | 29,695 | 27,577 | 25,459 | 23,342 | 21,224 | 19,106 | 16,988 | 14,870 | 12,752 | 10,634 | 8,516 | 6,399 | 4,281 | 2,163 | 45 | |
| Housing Completions | 2,936 | 2,304 | 1,602 | 1,886 | | | | | | | | | | | | | | | | | 8,728 |
| Annual Total Housing Supply ('Moderated') | | | | | 1,895 | 2,202 | 2,456 | 2,795 | 3,125 | 2,735 | 3,033 | 3,134 | 3,072 | 2,602 | 2,245 | 2,103 | 1,866 | 1,804 | 1,424 | 1,160 | |
| Average delivery 18/19 - 21/22 | 2,182 | 2,182 | 2,182 | 2,182 | | | | | | | | | | | | | | | | | 8,728 |
| Proposed Plan Housing Trajectory - average delivery 22/23 - 37/38 less 10% fallout (based on moderated supply) | | | | | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 2,118 | 33,886 |
| Annualised Housing Requirement at 1 April 2018 | 2,027 | 2,027 | 2,027 | 2,027 | | | | | | | | | | | | | | | | | 8,108 |
| Annualised Housing Requirement at 1 April 2022 | | | | | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 1,988 | 31,813 |

Explanatory Text to Proposed GNLP Housing Trajectory 2018/9 to 2037/38

| Row Heading | Row content |
|--|---|
| Managed Trajectory - Annual Housing Requirement of 40,541 to 2037/38 Taking Account of Average Delivery 18/19 - 21/22 and Proposed Plan Trajectory | Calculates for each year the remaining annual housing requirement needed to deliver the Plan's Housing Requirement, taking account of historic completions and future delivery in accordance with the proposed Plan Housing Trajectory. |
| Housing Requirement to 2037/38 | The total number remaining homes to be delivered to meet the overall plan housing requirement. Calculated at 1 April of each financial years by subtracting recorded/forecast completions from preceding years from the overall housing requirement. |
| Housing Completions | Number of housing completions recorded between 2018/19 and 2021/22 |
| Annual Total Housing Supply ('Moderated') | Replication of years 2022/23 to 2037/38 from the same row within the September 2022 Update to Table 4 Housing Trajectory 2018/9 to 2037/38 |
| Average delivery 18/19 - 21/22 | Average of the yearly completions recorded over the period 2018/19 to 21/22. |
| Proposed Plan Housing Trajectory - average delivery 22/23 - 37/38 less 10% fallout (based on moderated supply) | Average of the forecast "moderated" housing supply for the remainder of the plan period (2022/23 – 2037/38) less a 10% fallout rate to account for unforeseen delay or non-delivery. |
| Annual Housing Requirement at 1 April 2018 | The Annual Housing Requirement for Greater Norwich at 1 April 2018 calculated in accordance with government's Local Housing Need methodology |
| Residual Annual Housing Requirement at 1 April 2022 | The Annual Housing Requirement for Greater Norwich at 1 April 2022. Calculated by subtracting record completions 18/19 – 21/22 from the Housing Requirement and dividing this number of remaining years of the plan period. (40,541 – 8728 = 31,813; 31,813/16 = 1,988) |

Appendix D - September 2022 Update Graph: Housing Trajectory - Delivery of Greater Norwich's Local Housing Need (LHN) 2018/19 to 2037/38



Appendix E - August 2022 Update Table: Housing Supply Summary

| Source of Supply -- 'Moderated' | New Homes | Source of Supply -- 'Potential' | New Homes |
|--|------------------|--|------------------|
| Delivery in 2018/19, 2019/20, 2020/21, 2021/22 | 8,728 | Delivery in 2018/19, 2019/20, 2020/21, 2021/22 | 8,728 |
| Broadland Forecast (2022/23 to 2037/38) | 16,233 | Broadland Forecast (2022/23 to 2037/38) | 19,008 |
| Norwich Forecast (2022/23 to 2037/38) | 8,945 | Norwich Forecast (2022/23 to 2037/38) | 8,945 |
| South Norfolk Forecast (2022/23 to 2037/38) | 9,648 | South Norfolk Forecast (2022/23 to 2037/38) | 9,828 |
| South Norfolk Village Clusters Plan | 1,200 | South Norfolk Village Clusters Plan | 1,200 |
| Policy 7.5 delivery (up to 80 homes per year, gradually increasing following adoption) | 795 | Policy 7.5 delivery (up to 80 homes per year, gradually increasing following adoption) | 795 |
| Windfall allowance (approximately 83 per annum from 2028/29) | 830 | Windfall allowance (approximately 83 per annum from 2028/29) | 830 |
| Total Housing -- Moderated Supply | 46,379 | Total Housing -- Potential Supply | 49,334 |

Appendix F – Housing Land Supply Estimates at 1 April 2023

5 Year Housing Land Supply, based on approach as set out in paragraphs 41 to 43

| Greater Norwich 5 Year Housing Land Supply Assessment | Calculation | Numbers at 1 st April 2023 |
|---|----------------------------|---------------------------------------|
| LHN Annual Requirement | n/a | 1,995 |
| Requirement 1 April 2023 to 31 March 2028 | n/a | 9,973 |
| Adjustment for Shortfall/Surplus | n/a | n/a |
| Plus NPPF HDT Buffer at 10% | $9,973 \times 0.1$ | 997 |
| Total 5 year requirement 2018/19 to 2022/23 | $9,973 + 997$ | 10,970 |
| Revised Annual Requirement | $10,970 / 5 \text{ Years}$ | 2,194 |
| Supply of Housing | n/a | 13,273 |
| Shortfall/Surplus of Supply | $13,273 - 10,970$ | 2,303 |
| Supply in Years | $13,273 / 2,194$ | 6.05 |

5 Year Housing Land Supply, based on stepped trajectory approach as set out in paragraphs 50-54

| Greater Norwich 5 Year Housing Land Supply Assessment | Calculation | Numbers at 1 st April 2023 |
|---|---------------------------|---------------------------------------|
| LHN Annual Requirement | n/a | 1,150 |
| Requirement 1 April 2023 to 31 March 2028 | n/a | 5,750 |
| Adjustment for Shortfall/Surplus | n/a | n/a |
| Plus NPPF HDT Buffer at 10% | $5,750 \times 0.1$ | 575 |
| Total 5 year requirement 2018/19 to 2022/23 | $5,750 + 575$ | 6,325 |
| Revised Annual Requirement | $6,325 / 5 \text{ Years}$ | 1,265 |
| Supply of Housing | n/a | 6,912 |
| Shortfall/Surplus of Supply | $6,912 - 6,325$ | 587 |
| Supply in Years | $6,912 / 1,265$ | 5.46 |