



HEARING STATEMENT

Examination of the Greater Norwich Local Plan

On behalf of:
Orbit Homes

In respect of:
Matter 15 – Housing Provision

Date:
March 2023

Document Reference:
GA/DJ/00320/S0006

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Orbit Homes in respect of **Matter 15 – Housing Provision** of the Inspector’s Matters, Issues and Questions (March 2023 Sessions) for the Examination of the Greater Norwich Local Plan (the ‘GNLP’). It answers Question 2 and Question 5 with respect to the delivery of Policy LNGS 1 of the Long Stratton Area Action Plan.
- 1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan and will form the basis of our points for discussion at the Examination Hearing session on 22nd March 2023.

2.0 Questions

Q2. Taken as a whole, do any alterations to the site delivery assumptions significantly alter the overall housing land supply position?

- 2.1 Yes. In the housing trajectory update topic paper (D3.2D), the GNP forecast that securing mitigation for stalled developments will result in a delay in delivery of 18 months. As set out in our hearing statement for Matter 4 this length of delay is extremely optimistic given that projects have already been delayed by a year and there is no chance that sufficient mitigation will be in place to release sites within the next 6 months. In other parts of the country affected by Nutrient Neutrality it has taken significantly longer than 18 months (3 years+ and counting) to establish mitigation schemes and we consider this to be a more realistic length of delay in delivery for Greater Norwich. A 3 year+ delay will significantly impact the overall housing land supply position.
- 2.2 The GNP’s housing land supply position will also be significantly affected by current uncertainty and indecisiveness in decision making regarding which sites are actually caught by Nutrient Neutrality. In this respect we note that the commentary provided in the housing forecast topic paper (D3.2E) for our client’s site at Land off Green Lane West states that:

"On review, LPA do not consider that the discharge of outstanding conditions is constrained by nutrient neutrality. On this basis, partnership considers that the developer's forecast is realistic."

- 2.3 Our client has since submitted conditions discharge applications on this site and has been advised by officers that they are caught by Nutrient Neutrality. Our client submitted a detailed legal justification for why these conditions are not caught on 1st February 2023 and is still awaiting to hear anything back from the Council 4 weeks later. This site is currently included within the trajectory as delivering 50 dwellings in 5 years, but unless the above is resolved it will be delayed significantly by NN.

Q5. Are the assumptions for homes to be delivered on existing commitments justified in relation to the following sites?

Long Stratton

Have planning applications for residential phases of this site been approved?

- 2.4 No they are still pending determination. The applicant submitted a Nutrient Neutrality mitigation strategy in January 2023 but no comments have yet been received on this from Natural England.

Has public funding been secured in order to deliver the bypass? When is the bypass expected to be completed?

- 2.5 This is unclear from the information we have seen. We understand from a press release on Norfolk County Council's website dated 25th August 2022 (<https://www.norfolk.gov.uk/news/2022/08/long-stratton-bypass-recommended-to-progress>) that latest cost projections estimate the impact of unforeseen delays caused by the planning process, being led by the developer, combined with ongoing national and worldwide impacts linked to inflation, such as the pandemic and more recently the war in Ukraine, will see the likely cost of delivering the bypass rise by £8.789m to £46.232m.
- 2.6 The press release states that *"the original scheme cost was fully funded with a government contribution of £26.2m already secured from the Department for Transport. The council will continue to explore all sources of infrastructure funding to close the gap and a revised breakdown of funding contributions will be included in the Full Business Case that will be submitted for approval by government when all statutory approval processes are completed."* From this there would appear to be a question mark over whether the full funding for the scheme is available.

Are the assumed annual completion rates for this site likely to be achieved? Will there be multiple outlets on the larger site?

- 2.7 As set out in our previous hearing statement from February 2022, using Lichfields analysis in Start to Finish (Second Edition)¹, the average build-out rate for sites of 1,500-1,999 homes nationally is 120 dwellings per annum(dpa). However, as set out in Lichfield's analysis presented to Matter 2 of this Examination in Public (Ref: E2.19) sites in Greater Norwich deliver more slowly than the national average with sites of 1,000+ dwellings delivering just 80 dpa. The expected low proportion of affordable housing at just 10% affordable (reduced to help fund the bypass) will also affect delivery rates as affordable dwelling delivery is normally quicker due to it not being reliant on sales rates.

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

- 2.8 We understand that multiple sales outlets are proposed and this would help improve delivery rates, but the annual completion rates of up to 180 dpa are still considered excessive.
- 2.9 In summary, the delivery of this site has been repeatedly pushed back and it was subject to detailed questions in the examination hearings a year ago. Since this time, it has taken 10 months for the application to submit a Nutrient Neutrality mitigation strategy which has not yet been reviewed by Natural England and there is no indication that it will be deemed sufficient. There remain questions over the full funding of the bypass and the Council's forecast delivery rates are far higher than industry standards and local evidence suggest would be achievable. The site is not currently deliverable within 5 years and following this we would recommend a conservative estimate of 80 dwellings per year in line with local evidence.