

Greater Norwich Local Plan Examination (March 2023 Sessions)

On behalf of Halsbury Homes
Our ref 64264/01/MS/BHy
Date 03 March 2023

Subject Matter 15 - Housing Provision

1.0 Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?

In particular:

With regard to the September 2022 housing trajectory update (Document D3.2D Topic Paper) and housing forecast (Document D3.2E Topic Paper):

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

- 1.1 Yes.
- Issues regarding Nutrient Neutrality ('NN'), current market conditions (see our response to Q4), and wider issues with specific sites (i.e. East Norwich Strategic Regeneration Area ('SRA') and those discussed as part of Q5), means the housing land supply position has been significantly altered. Based on our own initial amendments to the Council's trajectory (see Annex 1) the Greater Norwich Development Partnership ('the Partnership' 'GNDP') only has a buffer of c.o.7% above its local housing need.
- 1.3 This buffer just 270 homes is in effect made up entirely of windfall development (including Policy 7.5 sites) and homes expected to be allocated as part of the emerging 'South Norfolk Village Clusters Housing Allocations Plan' (expected to deliver 2,825 homes in the plan-period); noting that the latest addendum to the Local Plan Viability Study (Appendix 2 to document ref. G2.1) finds the clusters site typology to be unviable (see our response to Matter 4).
- 1.4 We do not consider that this buffer is sufficient given the inherent development challenges in Greater Norwich, some of which have arisen since the Partnership's last trajectory update in September 2022:
 - Nutrient Neutrality: As per our response to Matter 4, the NN issue has and will continue to cause significant delays to bringing forward housing sites across affected areas in Greater Norwich. The Partnership's trajectory updates (ref. D3.2E) do seek to account for these changes but there are some issues we do not consider are adequately reflected. For example, the Viability Appraisal addendum (ref. G2.1) concludes urban typologies of sites in Norwich will be unviable. Many urban sites in Norwich may not only be delayed but never come forward.
 - **East Norwich SRA**: As per our response to Matter 4 and consistent with our position at previous hearing sessions, this site should be allocated but removed from the trajectory.



The site was already unviable before NN was an issue locally; requiring £129 million grant funding to come forward alongside lower infrastructure requirements. Now NN means that it may require an additional £16.8 million to £23.5 million based on the current estimates of costs of mitigation per dwelling.

- 3 **Other site specific issues:** While the trajectory is more realistic than that originally prepared (for example, we note the much greater use of our 'Start to Finish' report to benchmark build out on sites) the trajectory still does not reflect the latest position on sites and includes overly optimistic lead-in times (see our response to Q5).
- 4 **Wider market conditions:** Since the September update to the trajectory, the market has changed significantly. Mortgage rates are now markedly higher and as a result there is the prospect that house prices may fall by 9% to Q3 2025 according to the Office for Budget Responsibility¹. In response, many housebuilders are adjusting their sales forecasts and thus outputs from developments. For example:
 - a Barratt Developments noted that in January 2023 net private reservations per outlet were 45.6% lower than the same period in 2022².
 - b Persimmon noted weaker customer demand, reduced their forward sales position by£1 billion (from 2021's figure of £1.6bn), and paused the start of around 30 sites³.
 - c Taylor Wimpey notes that it entered 2023 with a lower private order book that in recent years, expecting volume to reduce⁴.

In addition, there have been strong increases in the costs of materials and labour⁵. For example, insulating materials have risen by 38.6% in the last year. The above factors will result in lower short-term output. Housebuilders will not build homes they cannot sell. This is not factored in the Council's latest trajectory update or its viability assessment.

- 5 **Affordable housing:** Linked to the above issues regarding NN and wider market conditions, it is likely that sites may need to provide lower levels of affordable housing to be viable. Additional housing sites will therefore be needed to deliver the same number of affordable homes originally planned for.
- 1.5 Overall, there is a significant risk that the plan will not deliver the number of homes either expected to be delivered or required (both overall and in terms of affordable housing). There were already delivery challenges in the Greater Norwich area as highlighted by key allocations sites not coming forward (such as Beeston Park, Brook Farm & Laurel Farm, and the many rolled forward allocations within Norwich City). NN has increased the overall delivery risk associated with the plan as has recent marked deterioration in market conditions. In this context, the Council should reflect once more on its trajectory but also allocate additional sites to increase the buffer to account for non-delivery of market and affordable housing; ensuring the plan is positively prepared and effective.

¹ OBR, Economic and Fiscal Outlook - November 2022

 $^{{}^2\,\}underline{\text{https://www.barrattdevelopments.co.uk/media/media-releases/pr-2023/pr-08-02-2023-half-year-results}}$

³ https://www.persimmonhomes.com/corporate/media/news/2023/trading-statement-

 $[\]underline{110123/\#:\sim:} text = The \%20 Group's \%20 private \%20 average \%20 selling, increased \%20 by \%208\%25\%20 to \%20 c.$

⁴ https://www.taylorwimpey.co.uk/corporate/investors/results-and-reports - Trading Update 13th January

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1134673/23-cs2_Construction_Building_Materials_- Commentary_January_2023.pdf



1.6

Q4. Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?

- If it were an accurate assessment, the GNDP's September trajectory (ref. D3.2E) would imply the GNLP will be able to demonstrate a supply of at least five-years upon adoption. However, this position is likely to be marginal or at risk of being under five-years both at the point of adoption but also continuing in the early years of the plan-period: This is for the following reasons:
 - Nutrient Neutrality: The Council identifies a supply of 12,473 homes in the first five-year period upon adoption (i.e. starting from the base date of 1st April 2022, as per Table 4, Appendix B, ref. D3.2D). Of this total supply, 3,984 homes are expected to come forward on sites identified as 'Red' in respect of NN: equivalent to 32%. This increases to 5,810 homes of the total 13,313 home supply expected for the next five-year period (starting 1st April 2023): equivalent 44% of the total supply.

A proportion of these 'Red' sites already have detailed permissions issued so can come forward despite being in the affected area while others relate to larger schemes that may be able to provide onsite mitigation. However, based on some initial analysis of the Council's trajectory:

- Out of the 3,984 'red' homes in the first five-year period (i.e. 1st April 22 base date),
 c.2,483 are expected to come from sites currently without a detailed approval (i.e. those sites with just an allocation or outline permission);
- Out of the 5,810 'red' homes in the second five-year period (i.e. 1st April 23 base date), c.4,042 are expected to come from sites without a detailed permission.

Some of these sites will eventually come forward – either purchasing credits or implementing on-site solutions – but some will have delivery delayed beyond the five-year period assessed and others will simply be unviable. For example, a significant portion of the "red" supply without a detailed permission was expected to come forward from the East Norwich SRA (300 homes between 2022/23 to 2026/27 and 565 homes to 2023/24 to 2027/28). We consider that this supply should be removed in full given the uncertainties related to the site's delivery in the context of the deliverability and viability challenges it faces.

- Market conditions: As per our response to Q2, there are immediate challenges in bringing forward development given the current market conditions. Mortgage rates have increased, house prices are expected to fall, and there has been lower demand for housing. This is in combination with higher costs of materials and labour. Housebuilders are therefore likely to reduce rate of output on individual sites to match reduced demand; meaning delivery rates originally anticipated early in the plan-period may no longer be achieved.
- 1.7 Overall, there is a significant risk that the Council's position five-year supply position will be marginal at best or fall under five-years. We have partially updated the Council's trajectory at Annex 1 of this statement. This includes amendments to the sites discussed in Q5 below, East Norwich SRA, but also other sites we previously amended as part of earlier hearing sessions. Based on these figures the Council would still be able to demonstrate a five-year supply but a marginal one at best, being at risk of falling below five-years if NN continues to delay sites being consented.



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

Beeston Park

Have reserved matters applications for residential phases of this site been submitted and/or approved?

1.8 No. While there was an NMA (ref. 20211172) approved in August 2022 (to amend the areas of development within the red-line) the latest RMA remains that seeking permission for the Phase 1 infrastructure (ref. 20180708) which was submitted in 2018 and is still not approved.

What upfront infrastructural works need to be completed before significant numbers of homes can be delivered? How advanced are those infrastructural works, and when are they expected to be completed?

This is a question for the developer and the Council to answer. However, the infrastructure needed will include that proposed in the pending RMA but also NN mitigation. No details of NN mitigation have yet been submitted for this site and it is unclear at what point any on-site measures – such as potential new wetlands – might be implemented to enable occupation/delivery of homes.

Is public funding necessary to deliver this site, particularly with regard to phases 2 and 3? If so, has this funding been secured?

- 1.10 Previously, the site required Government funding to deliver homes beyond Phase 1 (for 733 homes). A bid was made for HIF funding, but it was unsuccessful. The previous proforma return from TOWN. as part of the 'GNHLS 2019/20'6 noted that without public sector funding, the landowners and promotors will need to consider their strategy.
- 1.11 A new SoCG (ref. D8.B20) has been prepared which notes an incoming strategic investor has "sufficient capital and appetite for investment risk to deliver phases 2&3 scheme without the need for additional public funding". This investor is not named.
- While a new investor may be on board, there is no substantive evidence before this examination that provides sufficient certainty that a site where two phases were unviable given high infrastructure costs, to the point they needed Government funding to come forward (as part of a wider £57 million bid), is now viable without that funding. Especially so in the context of rising costs associated with NN and but also build material and labour cost inflation. The absence of any information as to the identity of the investor, their financial standing or viability evidence consistent with Government guidance to explain why a scheme that previously required gap funding now does not is of significant concern, and lacks credibility.

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

1.13 The rates of completion are in themselves considered reasonable. However, the lead-in times suggested are still too optimistic. The Partnership expects first completions in 2025/26; however, the current RM for infrastructure is yet to be approved and implemented, there are still no RM applications for housing, and it is unclear when that future application for homes could be granted permission given the need to provide suitable NN mitigation (and implement

⁶ https://www.southnorfolkandbroadland.gov.uk/downloads/file/1338/gnhls-2019-20-statement-for-amr - see page 51 of the PDF



that mitigation). The identity of the investor has not been revealed, let alone their ability to unlock the site demonstrated or on what basis. A more realistic timeframe for first completions would be 2027/28 at the very earliest; albeit even this is reliant on the scheme not requiring change and on when NN mitigation can be implemented, so it may be later than this date.

North Rackheath

At previous hearings it emerged that there was a dispute regarding whether an agreed Masterplan is required before development can take place at this site. Has this dispute now been resolved?

1.14 No. The LPA is still seeking informal working arrangements to take place between Halsbury and Taylor Wimpey before the application is determined. It has not been confirmed that a formal masterplan will not be required as Policy GT16 (in the adopted Growth Triangle AAP) originally envisaged.

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

- 1.15 No. Both pending applications are within the NN affected area. At this stage, Halsbury are unclear when it will be able to purchase credits to mitigate its scheme's impacts and therefore cannot confidently predict when delivery will commence on site. There is no firm evidence available to Halsbury or this examination to reliably say when a permission will be granted for the reasons outlined in relation to the delays that will be borne out of the delays in obtaining credits.
- 1.16 We understand that the Taylor Wimpey site is exploring options to provide onsite NN mitigation. However, the developer notes in its latest joint delivery statement (ref. D8.B38) that the incorporation of mitigation will require significant amendments to the submitted application and may affect the percentage of affordable homes delivered. It is therefore also unclear when that permission might be granted following the scheme being reworked and considered. It is therefore likely that Taylor Wimpey site will experience delays in obtaining an implementable planning permission.

Are the assumed annual completion rates for this site likely to be achieved?

- 1.17 The annual rates of completions expected are reasonable with reference to 'Start to Finish' averages for a site of this size. It is likely that there will be multiple outlets as both Halsbury and Taylor Wimpey deliver concurrently for part of the delivery trajectory. Taylor Wimpey's 'Joint Delivery Statement' notes that it will be them alone developing the wider permission out which may limit future rates; albeit, albeit it does intend to operate three different outlets. Therefore, 150 dpa is reasonable.
- 1.18 While the rates are considered reasonable, the lead-in times are overly optimistic with completions starting in 2026/27 for the following reasons:
 - Firstly, for the Taylor Wimpey site 'Start to Finish' found that sites for this size on average take 8.4 years from application to first completion; 2.3 years of this timescale being from the granting of the first detailed permission to that first delivery. This would put first delivery in 2030 and those averages were calculated prior to NN affecting lead-in times and Taylor Wimpey have already indicated it needs to rework its application.
 - Moreover, Taylor Wimpey is developing an almost adjacent site, 'Green Lane West', in Rackheath; a scheme of 205 homes. This site already has an outline permission but a future



RM is on hold given NN issues. Taylor Wimpey aims to secure a detailed permission in 2025 for this site (presuming a strategic mitigation scheme for NN is in place to allow that to occur) and then deliver the first homes in 2027. Presumably, Taylor Wimpey would not deliver homes at North Rackheath until that site is either largely complete or would supress rates during any overlap on both sites as it would seem implausible unless market conditions significantly changes that Taylor Wimpey would operate two outlets from this site in conjunction with a third on an adjacent 'Green Lane West' site. This means completions are unlikely to begin in earnest from the Taylor Wimpey site until 2031/32.

- While there is the prospect that the Halsbury element could deliver earlier as a smaller site it remains unclear when permission will be granted. If outline permission can be granted in c. 2024/25, then it is unlikely that first completions will occur until 2027/28 at the earliest; then delivering at c.40 dpa.
- 1.19 In line with the above comments, we have amended the site's delivery in our Annex 1 trajectory.

Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew

Have the access issues relating to this site now been resolved? Has a solution been agreed with the Highway Authority?

1.20 It does not appear that the issue has been resolved given permission has been granted for a roundabout in 2021, but we understand that this will now not be implemented, with a new solution sought for the longer term.

Why has this site not been developed since the original outline consent was granted?

1.21 As we understand it, there have been a mix of constraints associated with providing a bridge over the railway line and difficulties in securing this with Network Rail. This has led to access issues for the site which have proved insurmountable as the scheme was unable to come forward viably in phases ahead of that bridge being implement. The original permission — which included a 10-year long stop date — is now expected to lapse in June 2023 as confirmed in the LPA comments in (see D3.2E, part 2). Given the change in viability brought about by the Network Rail involvement to date and NN credits, any new permission on this site may be some years away and may be materially different to that currently approved.

Is the site controlled by a housing developer?

No. The site is controlled by a promoter and not a housebuilder. The promoter will now need to secure a suitable and viable access arrangement via a new planning application.

Norwich RFU

Are the club still committed to relocating from this site?

1.23 There is no updated evidence before this examination that Norwich RFU is committed to relocating to enable delivery on this site.

Has an alternative site been identified? If so, how advanced are any such relocation plans?

1.24 There is no updated evidence before this examination that Norwich RFU has found an alternative site to which it would move, which would enable the site to become available for development.



Is there a reasonable prospect that the site will be available at the point envisaged?

1.25 No, given our answers to the above questions.

Long Stratton

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

No. Both applications remain pending determination with revised schemes to accommodate the proposed bypass. The two schemes can provide a level of onsite NN mitigation; enabling 857 homes to come forward (569 homes from the larger eastern parcel and 288 from the smaller northern parcel). However, Natural England is still objecting to the schemes, requiring updated information regarding the proposed mitigation.

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

1.27 No specific response.

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

- No. The Council assume completion rates of 180 dpa (combined across the two sites). There is not the evidence that these rates will be achieved with reference to the number of outlets that will be operating and variety of development; especially when sites for this size were found to deliver at 120 dpa on average in 'Start to Finish'.
- 1.29 While both schemes may be subject to objection by Natural England, the timing of a wider mitigation strategy to enable to delivery of the scheme in full remains unclear, and first completions are some time off. The Council's delivery trajectory expecting first homes in 2024/25 appears over optimistic in this context. More realistically, homes are likely to come forward in 2026/27 at the earliest in line with other large schemes affected by NN (allowing also for c. two years from detailed permission being granted i.e. on the 600 home hybrid permission to first completion).



Annex 1: Amended Trajectory

LPA: Broadland Site Name	Site Ref	Арр Туре	Net Homes		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	Diff to GNA	NN RAG	Conclusion
Beeston Park	20121516	Reserved	nonles		22/23	23/24	24/23	2.57.20	20,27	2.7,20	20,25	23/30	50/31	JajJE	32,33	33/34	34,33	33,30	30,31	,-~		(in PP)	J 20 GRA		- See our Matter 15 statement.
DECKON PAIK	(Outline) 20180708	B Matters																						Red	- See our marter 15 statement.
	(pending determination)		3520	0					~	~ 2	5 7	5 12	25 150	15	0 150	150	150	150	150	150	2095	1425	-300		
North Rackheath	GT16	AAP Allocatio	n																						- See our Matter 15 statement. - Net homes increased to reflect Taylor Wimpey and Halsbury applications.
																									- Assumed Halsbury (Wroxham Rd) site starts in 27/28. Assumed then that Taylor
																								Red	Wimpey site starts in 31/32 (after their Green Lane West site has completed).
Land at Brook Farm & Laurel Farm, Green	20090886	Outline	4200				+	+	-	~ 4	0 4	10 4	10 40	15	0 150	150	150	150	150	150	150	1210	-740		- See our Matter 15 statement.
Lane, Thorpe	10030000	Outime																						Red	See our matter 13 statement.
St Andrew			600	0										6	8 68	68	68	68	68	68	124	476	5 0		
Norwich RFU	GT13	AAP	250																				-250	Red	- See our Matter 15 statement.
Total of Amended Sites	-	TAIL CALLED		•						0 6															
Total of Afficiated Sites						OJ.	oj	0] (D)	0] 6:	5 11	5] 16	55 190	36	8] 368	368	368	5] 358	S] 358	368	2369	3111	-1290	1	
LPA: Norwich				_																		Total			
Site Name	Site Ref 08/00974/F	Арр Туре	Net Homes		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+	(in PP)	Diff to GNA	NN RAG	Conclusion
Anglia Square	(extant) 18/00330/	/F																							 Pushed back site. 24/25 for first completions seems unrealistic given NN issues halting the grant of a
	(call-in refused) 22/00434/F (pending consideration)																							Red	planning application. - Application pending for 1,100 homes. Delivery likely to be higher than allocation amount if scheme approved.
			800					~ -	~ 20	0 200	20	0 20	10									800			
GNLP0360/3053/R10: East Norwich Strategic Regeneration Area (including	STR.01 - 12/00875/O																								- See our Matter 4 and 15 statement. - Site should be allocated but not be counted in the supply; instead being a reserve:
element of site within South Norfolk Area)	(Bracondale Deal																								 Site is unviable and there is no evidence of funding being in place to enable deliver
	Ground R9) 15/00997/F																							Red	- NN will cause further viability challenges to compound existing issues.
	(withdrawn -																								
	Utilities site)																								
Bethel Street, land to rear of City Hall	CC24		3362	-				+	-	-		-	-		1	-	-	-	-			0	-3363		- As per our previous matters statements, site should not be relied upon as there is a
allocation)			1									1	1												reasonable prospect the site will be developed in the plan period.
			1																					Red	 Typology of site found to be unviable given NN. New JDS (D8.N17) provides no firm evidence of developability. States that they are
			1	1																					"considering options".
		_	20												-							0	-20		
arden Street, land at (allocation)	CC10																								 - As per our previous matters statements, site should not be relied upon as there is reasonable prospect the site will be developed in the plan period.
			1									1	1												- Typology of site found to be unviable given NN.
			1									1	1											Red	 New JDS (D8.N24) provides no firm evidence of developability. States that they are
			1																						"considering options".
Gas Hill, Gas Holder	R13	+	100	1								+	1	 	+ -	-	1	\ 	1			0	-100		- As per our previous matters statements, site should not be relied upon as there is
			1									1	1											Red	reasonable prospect the site will be developed in the plan period. - Typology of site found to be unviable given NN.
																									I ypology of site found to be unviable given NN. Site was originally allocated in 2004.
Hurricane Way	R29	+	15	-			-	+	-	1	_	_	+ -	1				_				0	-15		No exidence to suggest the site is developable As per our previous matters statements, site should not be relied upon as there is
Turneanc way	1.23																								reasonable prospect the site will be developed in the plan period.
																								Red	- Typology of site found to be unviable given NN New owner noted. Unclear of their intention.
																									NEW OWNER INCLUSION CHEST INCLUDED.
Rose Lane and Mountergate, land	CC4a	+	30	-			-	+	-	-			+	_	_				-	~		0	-30		- As per our previous matters statements, site should not be relied upon as there is
at	1																								reasonable prospect the site will be developed in the plan period.
																								Red	 Typology of site found to be unviable given NN. New JDS (D8.N29) provides no firm evidence of developability. States that they are
			50				-												-	~		0	-50		"considering options".
Mountergate/Prince of Wales, land at	CC4b																								 Not the evidence to conclude that these sites - with active uses - have a reasonable prospect of being available and being viably developed at the point envisaged.
																									prospect of sering assistant and sering analy developed at the point enranged.
	1		200	ļ						-		-		-	~							0	-200		
Thorpe Road: 13-17 Norwich Mail Centre	CC15																								 As per our previous matters statements, site should not be relied upon as there is neasonable prospect the site will be developed in the plan period.
																									- Typology of site found to be unviable given NN.
																								Red	 No evidence that Royal Mail are actively looking for alternative site. Site does not la a reasonable prospect of being available and being viably developed at the point
																									envisaged.
			150	,														-		~		0	-150		
Waterworks Road, Heigham Water Treatment Works	R31																								 As per our previous matters statements, site should not be relied upon as there is reasonable prospect the site will be developed in the plan period.
neignam water freatment works																								Red	Typology of site found to be unviable given NN.
			60	,												~						0	-60		
Westwick Street Car Park	CC30																								 As per our previous matters statements, site should not be relied upon as there is reasonable prospect the site will be developed in the plan period.
																									- Typology of site found to be unviable given NN.
																								Red	 No evidence that there is a reasonable prospect of the site being developed at the point envisaged.
			30																				n .ar		point envisages.
Table of Assessed a 1 To 1	-	-	, 30					-					-										-30	1	-
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LPA: South Norfolk						and a	1															Total			
Site Name	Site Ref	Арр Туре	Net Homes		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	58+	(in PP)	Diff to GNA	NN RAG	Conclusion
Long Stratton 1	LNGS1 AAP Allocation (part -	-	1																						- See our Matter 15 statement.
	East of		1275			0				~	0	5	00		0 1~	430				7*		1075	, ,	Ked	1
Long Stratton 2	LNGS1 AAP	~	14/3							1		1	120	12	120	120	120	200	/:	/3	30	10/3	-200		- See our Matter 15 statement.
	Allocation (part - North West of Long		1																					Red	1
	Stratton)	1	600			0		~ -	~ 3	30	0 3	10 3	30 30	3	0 30	30	30	30	30	30	240	360	-60		L
Total of Amended Sites						0	0	0 0	31	0 80	10	5 13	10 150	15	0 150	150	150	130	105	105	290	1435	-260]	
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Summary																							•		
	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 in PP				
GNDP Position		el -		188	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16		8,728			
Previous Delivery Broadland	2,93	16 2,30	1602	188	90	05 73	34 87	7 971	1 1,021	8 1,141	1 1,18	2 1,20	9 1,168	1,15	6 1,057	1135	1092	1112	845	621		16,233			
Norwich			<u> </u>		21	12 59	96 56	632	2 102	6 776	5 78	4 81	5 920	68	4 541	426	298	304	191	176		8,945			
South Norfolk					77								_									9,648 34,826			
outh Norfolk Village Clusters Plan					1,89	95 2,20	2,45	6 2,790	3,115	5 2,710	2,78									877 120		34,826 1,200			
outh Norroik Village Clusters Plan								5	5 10	0 25				8	0 80							795			
											8							83	83	83		830			
/indfall Allowance	2,93	2,30	1,602	1,880	1,89	95 2,20	2,45	6 2,795	3,12	5 2,735	3,03	3,13	3,072	2,60	2,245	2,103	1,866	1,804	1,424	1,160		46,379	4		
rindfall Allowance otal Supply (Moderated)	2,53	_	1602	188																		8,728			
/indfall Allowance otal Supply (Moderated) ichfields Position revious Delivery	2,93	6 2,30			90									110								14,943 4,927			
/indfall Allowance otal Supply (Moderated) ichfields Position revious Delivery roadland		16 2,30		_						8 511	1 45	8 47	254							78					
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Windfall Allowance otal Supply (Moderated) ichfields Position Previous Delivery roadland forwich iouth Norfolk		2,30			21 77 1,89	78 87	72 98	1157	7 101:	1 768	78									105			1		
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