

**Greater Norwich Local Plan  
Hearing Statement  
March 2023 Sessions  
Matter 15 - Housing Provision**

## Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

[www.gnlp.org.uk](http://www.gnlp.org.uk)

The Councils have responded to each question in the body of the Hearing Statement.

## Question 2

### Matter 15 Housing Provision

**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?**

#### Response to Q2

1. The GNLP is a positively prepared strategy for the delivery of housing, providing a flexible approach and additional provision that helps ensure the delivery of the housing requirement as a minimum. These general issues have been discussed at previous hearing sessions.
2. The submitted plan identified a total supply of around 49,500 homes (specifically 49,492 homes) against a housing requirement of 40,541 in the Plan period. This supply is made up of a wide range of scale and type of site distributed across the area, only takes account of a limited proportion of expected windfall and includes a contingency site to provide a further opportunity to ensure needs are met.
3. Land supply estimates will always change through time.
4. A re-assessment in 2021 included a revised trajectory within the appendices to the Policy 1 Topic Paper [D3.2B](#). This estimated a “moderated” supply for delivery in the plan period of around 48,150 and a “total potential” including homes more likely to be delivered after 2038 of around 50,300 homes. There is no policy constraint to the delivery of the total potential within the plan period.
5. The most recent trajectory from September 2022 [D3.2D](#) (page 21) takes account of delays caused by nutrient neutrality and revised conclusions about specific sites reflecting previous hearing discussions. It estimates a “moderated” supply of around 46,400 and a “total potential” of around 49,350. The reduction since the 2021 calculation results from revised assumptions discussed at previous hearing sessions. The moderated supply provides a delivery buffer in excess of 14% over the plan requirement. This may well be an underestimate as sites can deliver more than been assumed for the purposes of the September 2022 update; an example of which would be at Anglia Square where the trajectory includes 800 homes while the application is for 1,100 homes.

6. While some details will have evolved since [D3.2D](#) was published, the partnership does not consider that the overall position has changed substantively and the Plan clearly remains deliverable over the plan period.

#### Question 4

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

##### Response to Q4

7. The September 2022 update demonstrates a 6+ year housing land supply for the period 1st April 2023 to 31st March 2028. This assumes that housing sites requiring nutrient neutrality mitigation are considered deliverable within the five-year period. This position is set out at paragraphs 33-49 of document [D3.2D](#). This approach is consistent with the government's position expressed in the DLUHC Chief Planner's [letter](#) of July 2022 (bottom of 4th page). The Chief Planner stated "*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*" While detailed guidance has not yet been issued, the government's position on the principle is clear i.e. sites affected by nutrient pollution forming part of housing land supply calculations are capable of being considered deliverable.
8. Progress on mitigation opportunities is discussed under MIQs Matter 4 Q18.
9. In addition to taking account of discussions at previous sessions and of the impact of nutrient neutrality, the method used to calculate the five year land supply continues to take a cautious approach to delivery of windfall development ([D3.2D para 23](#)), and does not attribute any delivery of sites from the South Norfolk Village Clusters Plan ([D3.2D para 31](#)) in the 5yrs period (Refer to document [D3.2D page 31](#) - Appendix B - September 2022 Update to Table 4 Housing Trajectory 2018/9 to 2037/38).

## Question 5

*(Please note that links to documents are in the conclusion at the end of the response for each specific site).*

### **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?**

#### **Response**

10. A Reserved Matters (RM) application for a strategic infrastructure package on Phase One was submitted in 2018 (20180708) and has a committee resolution to permit, subject to approvals of the Lead Local Flood Authority, the Highways Authority and the Environment Agency. These have all now been received, subject to conditions on the RM, but issuing the permission has been delayed due to nutrient neutrality issues. Discussions on this issue are taking place with Natural England, and once agreed, will facilitate approval of the current application.

11. Once approved, it will allow for the delivery of serviced development plots to housebuilders following RMs for detailed design matters. The RM 20180708 and the conditions included for discharge have been caught by Nutrient Neutrality (NN), as such work has been ongoing to deliver a strategy that ensures the development achieves NN and can come forward with little delay.

- **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?**

#### **Response**

12. Other than normal on-site infrastructure, off-site works are set out in the Beeston Park Development Phasing & Infrastructure Improvements Strategy (DPIIS) paragraph 3.2 and largely relate to off-site highway works within the highway boundary to unlock phase 1 and 3. In the case of Phase 1 these are limited to three small off-site highway improvements to be delivered within the existing highway boundary. Beyond these works, improvements of bus services and upgrades to the electricity supply are required. An on-site wastewater treatment works and/or an off-site wetland needs to be delivered to ensure NN is achieved.

13. One of the junction improvements has already been agreed in principle by the County Council as the Highways Authority. Discussions have been held with the bus operator regarding Phase One service improvements and an in-principle agreement has been reached. These infrastructure works have not been undertaken further whilst the nutrient neutrality strategy is being finalised. The strategy has been the subject of detailed discussions with Broadland and is expected to be submitted in the near future.

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

#### **Response**

14. Public funding is not required for any phase. The previous HIF bid addressed the then absence of a strategic investor to deliver the site and provided an opportunity to speed up delivery. It did not indicate that the development is unviable.

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

#### **Response**

15. The intention of the incoming master developer, as well as being a developer in their own right, is to sell serviced sites. It is envisaged that multiple house builders will be on-site at Beeston Park simultaneously and the planning permission is structured to enable the contemporaneous delivery of individual phases, with the opportunity for the delivery of multiple phases concurrently.

16. The site benefits from outline permission, an approved site wide design code and a resolution to permit the strategic infrastructure application. The trajectory assumes first delivery in 2025/26 of 25 dwellings increasing to 150 homes per annum. On this basis the housing forecast indicates the first dwellings would likely be delivered in the first quarter of 2026, three years from now. Given the scale of the site and the visibility to 3 different radials, the delivery rate assumed could well be an underestimate.

17. The incoming master developer continues to consider development is likely to occur more quickly than is assumed in the housing forecast as set out in the Joint Delivery Statement.

#### **Conclusion on Beeston Park**

18. The evidence justifies the assumption of first completions in early 2026, rising to a delivery rate of around 150 per annum by 2028/29.

Relevant documents for Beeston Park include:

Previous Joint Delivery Statement: [D8.B20](#)

Latest Joint Delivery Statement: D8.B20.1 (link to follow)

Trajectory Forecast: [D3.2E](#) Part 1 page 2

Trajectory Rationale: [D3.2E](#) Part 2 page 6

Beeston Park Development Phasing & Infrastructure Improvements Strategy June 2021 TOWN: [B32.1](#)

### **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?**

#### **Response**

19. The site was allocated under Policy GT16 of the Growth Triangle Area Action Plan (AAP). Policy GT 16 states that the layout of development will be determined through a participative masterplan process. A council led masterplan for the site was prepared in accordance with the policy requirements and subsequently endorsed by [Broadland's Cabinet on 6 March 2018](#). The council's masterplan set out the distribution and interrelationship of land uses across the whole of the GT16 allocation site.
20. Following the masterplan's endorsement Taylor Wimpey agreed a contract with the majority owner of the GT16 site and made a long-term commitment to its delivery. Halsbury Homes have separately brought forward an application on a minority landownership to the east of the allocation site. An even smaller element of the allocation site, at its southern tip, is also in a third-party landownership. No application has yet been submitted on this third element of the site.
21. During 2021 and in preparation of its application Taylor Wimpey engaged with the local community alongside a range of other stakeholders to revise the endorsed masterplan to bring it up to date in line with the current arrangements for the delivery of the site. This informed their final submissions contained in their outline application for the site on 22 April 2022 (District Reference: 20220663). The council considers this process to be consistent with the expectation of the GT16 policy.
22. In between Taylor Wimpey starting its engagement on a revised masterplan and the submission of its planning application, a separate application was submitted by Halsbury Homes on 03 November 2021 (District Reference: 20212010).

23. As part of the consideration of these applications, the council is in parallel negotiations with both developers to refine and evolve their submitted development proposals. The purpose of these negotiations is, amongst other things, to ensure that the policy aspirations for the GT16 site, and more widely the development plan when taken as a whole, will be met through these developments.

24. Discussions remain ongoing in respect of both applications. However, the council does not currently consider that there are any fundamental planning issues related to the GT16 allocation policy that will prevent the progression of the Taylor Wimpey application towards an approval. Delivery is therefore anticipated in line with the evidence that underpins the housing trajectory.

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

**Response**

25. An outline application for the Taylor Wimpey site (20220663) was validated in April 2022 and an outline application for the Halsbury Homes site (20212010) was validated in November 2021. Negotiations continue on both applications. Taylor Wimpey's timetable is understood to envisage approval by autumn 2024 with reserved matters following swiftly.

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

**Response**

26. The updated Joint Delivery Statement for North Rackheath sets out Taylor Wimpey's intentions in respect of the progression of the current application, the preparation and the submission of further planning applications. It also sets out their approach to the development of the site in order to achieve housing delivery in accordance with the assumed completions rates.

27. The trajectory only includes the 3,000 homes identified in the AAP, with 1,950 delivered over 12 years from 2026/27 and the remaining 1,050 homes to be delivered after 2038. Assumed delivery rates have been agreed with Taylor Wimpey and based on their expected delivery using three outlets on their element of the allocation. This is a slightly more cautious estimate than is forecast in the Joint Delivery Statement.

28. The assumed rates in the trajectory for North Rackheath do not include the Halsbury Homes proposal which is not currently included separately in the supply or the trajectory. The inclusion of this proposal as a separate element of the allocation would provide an additional 350 homes and at least one additional outlet capable of boosting delivery of the allocation.



### **Conclusion on North Rackheath**

29. The evidence indicates that the North Rackheath site is deliverable at the assumed delivery rates and the housing forecast indicates the potential for first residential completions to be achieved in 2026/27. This is slightly slower than the developer's forecast included in the Joint Delivery Statement and reflects a slightly more cautious approach on behalf of the partnership.

Relevant documents for North Rackheath include:

Previous Joint Delivery Statement: [D8.B38](#)

Latest Joint Delivery Statement: [D8.B38.1](#)

Forecast: [D3.2E](#) Part 1 page 3

Rationale: [D3.2E](#) Part 2 page 12

North Rackheath Masterplan Framework, February 2018: [B33.1](#)

### **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?**

#### **Response**

30. Active negotiations are taking place between the site promoter (Lothbury) and the local authorities and acceptable solutions for access via both Plumstead Road and Middle Road have been agreed in principle with the authorities. The solutions avoid the need for any new bridge over the railway line.

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

#### **Response**

31. The scheme has been delayed by the need to develop an acceptable and deliverable access strategy. The scheme, as originally permitted, required the delivery of a new bridge over the Bittern Railway Line as part of the delivery of a new link road. The financial consideration that Network Rail require for the delivery of a new bridge would make the site unviable. In principle agreements have been reached on these matters enabling the scheme to be built out as per the forecasts in the updated housing trajectory.

- **Is the site controlled by a housing developer?**

## Response

32. The strategic promoter, Lothbury, is understood to have been discussing options with house builders but none have been confirmed at this time. It is not uncommon for a strategic promoter to secure an allocation and outline permissions for a site before disposing of it to one or more housebuilders. There are a number of sites within Greater Norwich that are currently, or are soon to be, delivered on this basis including land within the Growth Triangle. Land coming forward in this way can have the benefit of attracting new housebuilders into the area. The partnership's forecast provides ample time for permission to be secured and disposed of to a housebuilder.

33. Whilst the current 10-year outline permission (20090886) lapses in summer 2023, Lothbury continues to actively progress the scheme. This includes developing highway proposals to address the major constraint as set out above. Therefore, the site is considered to be developable.

## Conclusion on Brook Farm/Laurel Farm

34. The inclusion of the site in the trajectory is justified by the evidence. The site is within a single landownership. The strategic promoter holds an option on the land and has invested in the acquisition of 3<sup>rd</sup> party land to enable the delivery of the northern access to the site. As such they remain incentivised to deliver the scheme, and it is clear from their ongoing work to resolve the access issues that they are actively working to do so. The council's current forecast for the site is based on an assumption that a new application would be submitted in 2026/27, with first completions delivered some five years after this submission in 2031/32 and an element of the site being delivered beyond the plan period. Given the strong likelihood that a deliverable highway/access scheme will be agreed between the promoter and the highway authority in the near future, it is distinctly possible that the promoter will achieve delivery ahead of the council's forecast.

Relevant documents for Brook Farm include:

Joint Delivery Statement: [D8.B32](#)

Trajectory Forecast: [D3.2E](#) Part 1 page 3

Trajectory Rationale: [D3.2E](#) Part 2 page 10

## Norwich RFU

- **Are the club still committed to relocating from this site?**

## Response

35. The club are committed to finding a solution to ensure its long term financial and operational stability. The partnership understand that this has been the driving

force behind the actions of the club. To date, the club have sought to achieve these outcomes through their relocation and the development of their existing site. This included securing permission for an expanded facility at the University of East Anglia (UEA) (2016/0233). The relocation of the club to the UEA has now been ruled out. As stated in the partnership's October 2022 update to the housing trajectory, the site remains allocated within the Growth Triangle AAP and the relocation of the facility remains a potential outcome for the club in pursuit of the objectives stated above. The club continues to explore opportunities for relocation, alongside other solutions to deliver their outcomes. Given the current uncertainty about the club's relocation, housing completions from this site are not forecast until 2031/32. This allows ample time for the issues to be resolved. If the solution to the club is not to relocate, and the site is not developed, then this would have only a minimal impact on the partnerships Housing Forecasts and would not materially affect the achievement of the Housing Trajectory.

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

#### **Response**

36. The partnership understands that currently no alternative site is available. The partnership understands that the club's current focus is on negotiations with the incoming strategic investors for the Beeston Park development.

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

#### **Response**

37. Despite the uncertainty about the club's strategy for the future, there is a reasonable prospect the site will be available at the point envisaged. As set out above, if the solution for the club is not to relocate, and the site is not developed then this would have only a minimal impact on the partnership's Housing Forecasts and would not materially affect the achievement of the proposed Housing Trajectory.

#### **Conclusion on the RFU site**

38. Relocation and redevelopment of the Norwich RFU site remains an option to ensure the long term financial and operational stability of the club. The site has been identified as suitable for development through its allocation in the Growth Triangle Area Action Plan and there remains a reasonable prospect that the site will be available at the point envisaged. Inclusion of the site within the trajectory is justified by the evidence. The partnership's Housing Forecasts provide ample

time for issues to be resolved, with first delivery not forecast until 2031/32 and completion in 2036/37.

Relevant documents for Norwich RFU include:

Trajectory Forecast: [D3.2E](#) Part 1 page 3

Trajectory Rationale: [D3.2E](#) Part 2 page 12

### Long Stratton

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

#### **Response**

39. Both the hybrid application 2018/0111 for 1,275 homes and a bypass (in full) on the eastern side of Long Stratton and the hybrid application for 600 homes (213 in full) to the north-west are due to be considered by South Norfolk Council's Development Management Committee on 15<sup>th</sup> March 2023. Proposed conditions will allow for up to 250 homes to be occupied prior to the completion of the bypass.

40. Norfolk Land has submitted a nutrient neutrality strategy that covers all 1,875 homes and is working with Natural England and the council/s on what the long-term position and the technical achievable limits are. In the short-term there are solutions to create the capacity for constructing circa 600-700 dwellings (including the first phase on the west) with on-site measures such as increased SUDs capacity, and the fallowing of agricultural land so that fewer nutrients drain into nearby watercourses. Longer-term solutions that could enable all 1,875 homes to be constructed include Norfolk Homes/Norfolk Land awaiting improvement to the existing wastewater treatment works by Anglian Water to the best Technically Achievable Limit (TAL), or constructing new off-site wetlands.

41. Substantial progress continues to be made on the section 106 agreement for both applications. This includes in principle agreement on the level of affordable housing, although the detail of this remains confidential at the present time.

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

#### **Response**

42. The bypass scheme is funded by contributions from both central government and local contributions. The Department for Transport has committed to funding £26.1 million (subject to submission of a successful full business case) which has been phased across both development and delivery of the proposal. Local contributions have been provided from both the developer and Greater Norwich

Growth Board (GNGB). The developer has committed to £4.5 million, alongside £10 million from the pooled Community Infrastructure Levy (CIL) fund managed by the GNGB. The remainder of the £46.23 million cost estimate will be underwritten by Norfolk County Council until the remaining local contributions have been confirmed.

43. The proposed scheme is programmed to commence in April 2024, subject to the necessary approvals, and currently has a construction duration of 18 months. This would put completion in the monitoring year 2025/26.

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

### **Response**

44. The trajectory continues to envisage the western scheme of 600 homes with first completions in 2024/25 building out at 30 homes per year. This is assumed because Norfolk Homes will be the sole developer and 30 homes per year is a typical build out rate for them as a housebuilder.

45. The eastern part of the scheme starts with 50 homes in 2026/27 and accelerates to 150 homes per year. This is a realistic estimate as a site of this scale would normally be expected to be built out by multiple outlets and it is Norfolk Land's intention to sell tranches of the site to other regional and national housebuilders. It is understood that a large number of developers have registered interest in the site; and the expectation of Norfolk Land is that development will comprise a multi-developer project with potentially three developers building at any one time.

46. A proposed link road through the scheme will create multiple points of access and reinforce the opportunity for multiple developers to build out simultaneously.

### **Conclusion on Long Stratton**

47. The starts and delivery rates included in the trajectory for these two sites are consistent with the evidence on planning decisions and reasonable assumptions on developers.

48. Up to 250 homes can be occupied prior to the completion of the bypass. The bypass is on track to be completed in the monitoring year 2025/26. The trajectory assumes just under 250 homes will be delivered by 2027/28. Therefore, even if the bypass were to slip two years the trajectory would be unaffected.

Relevant documents for Long Stratton include:

Previous Joint Delivery Statement: East [D8.S30](#) / West [D8.S31](#)

Latest Joint Delivery Statement: East [D8.S30.1](#) / West [D8.S31.1](#)

Trajectory Forecast: [D3.2E](#) Part 1 page 13

Trajectory Rationale: [D3.2E](#) Part 2 page 59