

EXAMINATION OF THE GREATER NORWICH LOCAL PLAN

STATEMENT ON BEHALF OF TERRA STRATEGIC – ID 24244

LAND OFF BAWBURGH LANE, COSTESSEY

MATTER 15 – HOUSING PROVISION

This Statement is made on behalf of Terra Strategic in respect of Land off Bawburgh Lane, Costessey. Terra Strategic control much of the site, with the remainder controlled by Norwich City Council, who are supportive of the development proposal and have agreed for Terra Strategic to take the lead with promotion of the Site through the Local Plan process.

The site forms a contingency allocation within the draft GNLP Sites Document as part of Policy GNLP0581/2043. This contingency site allocation is identified on Submission Policies Map – South Norfolk for approximately 800 homes plus other infrastructure including a primary school and sixth form provision.

A Promotional Document is appended to our Matter 2 Statement, which sets out how the site responds to its context, and how it could be developed within the Plan period.

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 Topic Paper D3.2D summarises changes to the housing trajectory (site capacity and delivery) as previously published at D3.2C, which reflects April 2022 housing monitoring, examinations of individual sites at February/March 2022, updates regarding delivery from developers/site promoters and consideration of impact of Nutrient Neutrality advice published by Natural England on 16th March 2022.
- 1.2 Paragraph 38 of D3.2D suggests that the approach taken to the 'expected rate of housing delivery in the GNLP housing trajectory' means that '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'. However, the GNLN acknowledge that this number includes a reduced delivery of homes in the early years of the plan and an uplift of homes delivered in the longer-term¹.

1.3 We reiterate issues raised within our previous response to Matter 15 (11th February 2022) where constraints to the delivery of sites such as East Norwich were acknowledged². These constraints remain relevant and the updated evidence base [D3.2E – part 2] shows that the capacity of the East Norwich site has been subject to a modest reduction from 3,4693 to 3,362. The capacity reduction is largely due to a fall and delay in expected first delivery of dwellings from 100 in 2024/2025 [D3.2C] to 52 in 2025/26. Given that many sites summarised in the D3.2E table show modest or no reduction in capacity, alterations to housing land supply are most likely to be incurred from delays to delivery on the basis of the GNLN evidence base [DS3.2E – Part1], specifically the short-term/early stages of the plan (as demonstrated by East Norwich Strategic Site). The expected delays to commencement of housing delivery is to 'account for nutrient neutrality mitigation impacts'.

1.4 The GNLN [D3.2D paragraph 21] sets out that for minor sites:

'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'.

1.5 The GNLN [D3.2D paragraph 16] sets out that for major sites:

'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,

¹ D3.2D Paragraph 37 to 38, Page 11.

² Noting the concerns raised with the allocation from Historic England [E3.19] and [E8.7]

delaying expected delivery of a site for 18 months' (Unless evidence suggests otherwise).

- 1.6 The GNLP considers the delays to be 'proportionate and short-term'. However, given uncertainty relating to the implications of nutrient neutrality (see our response to Matter 4 submitted 3rd March 2023) delays could be longer than this. There is already evidence within D3.2E (Part 1) that some delays incurred are more significant. For example, the delivery of 200 homes at Land at Barrack Street would not be expected until 2034/35 as opposed to previously expected at 2030/31 [D3.2C]. The uncertainty around timescales for deliverability will alter the housing land supply position, particularly in the short term. As such, sites which are available now and currently not being considered or earmarked as a 'contingency' (i.e. the Costessey site) need to be prioritised for full allocation.
- 1.7 It is also pertinent to reiterate here the implications for affordable housing delivery – see our comments on our Matter 4 statement.

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

- 2.1 According to the GNLP⁴ *'In the Partnership's view, the clear progress that is being made towards identifying mitigation solutions to address nutrient neutrality...and should be given significant weight in the assessment of the deliverability of sites for the purposes of Plan Making'* and further states that *'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'*. However, we are concerned that there is a high level of uncertainty relating to the availability, timing and costs of Nutrient Neutrality mitigation and the impact this uncertainty could have upon specific site deliverability (this is acknowledged at by the GNLP⁵). As noted in our response to Matter 4, based on current available evidence for Nutrient Neutrality mitigation, 5 of the 12 identified housing typologies would fall into a viability deficit.
- 2.2 Sites comprising these typologies could be concluded by individual site promoters as being undeliverable. This includes the large strategic East Norwich site (over 3,000 homes). Whilst some of these sites are not expected to contribute to supply in the first five years, there are several sites which are needed, and the trajectory assumes many of these will be delayed due to the

⁴ D3.2D Topic Paper – Policy 1 Growth Strategy - Point 42, Page 12

⁵ Noting comment from GNLP Partnership [D3.2D] (paragraph 43, Page 12)

Nutrient Neutrality issue. In a note published by the Partnership in March 2023 clarification is provided regarding point 1 of the Nutrient Neutrality Evidence Base document (G2.2) which relates to housing numbers and those impacted ('held up') by NN in the Greater Norwich area. According to this note, 'of the 37,651 homes to be supplied within the plan period to 2038 (at 1st April 2022), 23,948 will be impacted/delayed by NN (11,259 in Broadland and 5,690 in South Norfolk)'. These figures demonstrate a much greater number of homes being delayed in their delivery compared with the 10,956 'total' homes 'held up' according to G2.2.

- 2.3 This latest update supports our view that many more sites will commence later than anticipated, which will affect the initial five year supply. Even in cases where sites would remain 'deliverable' there will be a delay. The Partnership has engaged with promoters/developers for all major committed sites and added 'delays of 18 months to delivery'⁶ (unless evidence suggests this would be different). Whilst this is considered a 'reasonable timescale to allow for mitigation schemes to come into effect and account for delays in decision making' we do not accept that sufficient evidence has been collected to justify this 18-month period. The delays could be longer especially given that official PPG relating to Nutrient Neutrality has not yet been published, and work regarding required mitigation is on-going.
- 2.4 Whilst the GNLP [D3.2D – Paragraph 42 and 43] states that: '*In the Partnership's view, the clear progress that is being made towards identifying mitigation solutions to address nutrient neutrality, should be given significant weight in the assessment of the deliverability of sites for the purposes of Plan Making. 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*'. However, the GNLP does accept 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*'. We consider that the latter is a more reasonable conclusion, and the plan may be at risk of being considered not sound without evidence to support the trajectory.

⁶ GNLP Partnership [D3.2D] (paragraph 16-19, Page 5-6)

2.5 The GNLP [D3.2D – Paragraph 45] suggest that *'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'. One of the solutions is to adopt a stepped housing requirement. This would involve '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. 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.'*

2.6 However, we do not consider the proposition of a stepped trajectory to be a credible solution. The PPG (Paragraph: 019 Reference ID: 68-019-20190722) states that:

'As set out in the National Planning Policy Framework, local planning authorities should identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Local plans and spatial development strategies may be able to satisfy the tests of soundness where they have not been able to identify specific sites or broad locations for growth in years 11-15. However, if longer-term sites are to be included, for example as part of a stepped requirement, then plan-makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged.'

2.7 Furthermore, PPG (Paragraph 021 Reference ID: 68-021-20190722) states that:

'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs.'

2.8 We consider that the approach set out by the GNLP would result in an unnecessary delay to meeting identified development need and that there are additional sites which should be allocated now to provide flexibility of supply, which would address the first five years and negate the need for a stepped trajectory. A Our site at Costessey is available now, and is of the scale to support on-site Nutrient Neutrality mitigation. Its identification as a full allocation would be the most obvious way to address the housing supply concerns.

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? 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? Is public funding necessary to deliver this site, particularly with regard to phases 2 and 3? If so, has this funding been secured? Are the assumed annual completion rates for this site likely to be achieved? Will there be multiple outlets on this site?)

3.1 Aside from a Reserved Matters for infrastructure that is still not approved, Reserved Matters for the rest of the site have not yet been submitted. We are unaware that there are any delivery partner(s) on board. We would therefore suggest that the assumed trajectory is unrealistic, and we will not see 25 dwellings in 2025/26, 75 dwellings in 2026/27 or 125 dwellings in 2027/28. There is currently insufficient evidence to justify the number of dwellings that could be delivered in the plan period generally.

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? Have planning applications for residential phases of this scheme been approved? Are the assumed annual completion rates for this site likely to be achieved?)

3.2 A review of the available 'Site allocation statements of common ground/Delivery statements'⁷ shows that no SoCG has been provided for this site. We are not aware of any applications having been approved.

⁷ GNLP: [D2 - Site Allocation Statements of Common Ground/Delivery Statements | GNLP](#)

3.3 Based on revised projections, the original allocation for 3,000 homes was reduced to 2,404 in Regulation 19 to 2038. This has been further reduced to 2,125 within the plan period⁸. It is unclear how this projection may be further affected and there is insufficient evidence to justify the number of dwellings that could be delivered within the plan period.

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? Why has this site not been developed since the original outline consent was granted? Is the site controlled by a housing developer?)

3.4 Outline permission was granted by South Norfolk and Broadland District Council in 2009. A number of conditions have been discharged between 2017 and 2018. There is an application, submitted 28th November 2018 (reference: 20181938), which seeks to discharge condition 4 of Planning permission 20171553 for highway improvement works. This application is still pending a decision. There does not appear to be any further documents available as part of the GNLP evidence base which show that the issues relating to access at the site have been resolved. There does not appear to be any SoCG. It is unclear why the site has not been developed but there are likely to be constraints inhibiting progress. More evidence needs to be provided to demonstrate deliverability.

Norwich RFU: (Are the club still committed to relocating from this site? Has an alternative site been identified? If so, how advanced are any such relocation plans? Is there a reasonable prospect that the site will be available at the point envisaged?)

3.5 The D3.2E – Part 2 states that ‘the RFU continue to explore opportunities to relocate, facilitated by the sale and redevelopment of their current site. No significant progress is currently being made towards an application. The Partnership considers that it is realistic to assume an application will be submitted in 2026/27’ and that ‘this would enable first completions to be achieved in 2031/32, approximately 4 years after the expected submission of the application’. Additional evidence should be made available to justify the timescales for housing delivery here.

Long Stratton: (Have planning applications for residential phases of this site been approved? Has public funding been secured in order to deliver the bypass? When is the bypass expected to be completed? Are

⁸ Topic Paper – Policy 1 Growth Strategy – Update to Housing Trajectory Tables and Graphs in Appendix 4, November 2021 (Page 10)

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

- 3.6 In relation to the larger site (east of Long Stratton for 1,275 homes) according to D3.2E – Part 2, the promoter of this site has submitted a planning application (reference: 2018/0111). The application has not yet been approved, it is pending approval and is currently under review with the most recent consultation period having completed on 16th February 2023⁹. According to Norfolk County Council, *'An outline business case submitted to the Department for Transport (DfT) to bid for Major Road Network funding to help facilitate delivery of the project was approved by government in July 2021'*¹⁰. The County Council go on to suggest that the construction works are anticipated to start April 2024 and be open to traffic in Autumn 2025. However, this is subject to *'planning approval, procurement, and completion of other necessary statutory approval processes'*. We anticipate that there could be delays to this proposed timescale which would delay delivery of the Long Stratton sites.
- 3.7 With regard to the smaller site (northwest of Long Stratton for 600 homes) the annual completion rates would be 30 dwellings [D3.2E – Part 1] from 2024/25 up to 2037/38 and with 180 homes delivered beyond 2038. With regard to the larger site development is forecast to be delivered at 2026/27 with 50 homes and will progress at annual completion rates of between 50-150 up to 2037/38 [D3.2E – Part 1]. Given that these sites are shown to be impacted by Nutrient Neutrality mitigation, falling into a viability deficit, these completion rates are uncertain. We consider more robust evidence is needed to demonstrate deliverability of all phases taking into account the timing of the bypass and nutrient mitigation.

⁹ [2018/0111 | Land East of the A140: Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions. | Land East Of The A140 Long Stratton Norfolk \(southnorfolkandbroadland.gov.uk\)](#)

¹⁰ [Long Stratton Bypass - Norfolk County Council](#)