



North Norfolk Local Plan Examination Hearing Statement – Matter 7

Boyer

Report Control

Project:	North Norfolk Local Plan Examination
Client:	Richborough
Reference:	23.3029
File Origin:	
Primary Author	Amy Harrison / Simon Atha
Checked By:	Simon Atha

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	29/11/2023	Draft	SA
2	19/12/2023	Final	SA

TABLE OF CONTENTS

1. Introduction	2
2. Question 7.1 – The Housing Trajectory	3
3. Question 7.2 – Five-Year Supply	6

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Richborough in response to the Inspectors' Matters, Issues and Questions in relation to Matter 7 (Housing Trajectory, Five Year Supply & HOU Policies 3, 4, 6-9) of the North Norfolk Local Plan Examination.
- 1.2 Boyer have been appointed by Richborough to act on their behalf in respect of promoting land interests at Land End of Mundesley / Land at Paston Gateway (HELAA ref: NW16/1) for residential development.
- 1.3 Boyer have previously made representations to the Regulation 19 Local Plan consultation (March 2022) and our Hearing Statement should be read in conjunction with those representations.

2. QUESTION 7.1 – THE HOUSING TRAJECTORY

7.1 In the light of the site-by-site discussion, is the overall housing trajectory in the plan justified by the evidence? How has the trajectory for both large and small sites been affected by the need to secure nutrient neutrality and is this realistic?

- 2.1 We consider that the housing trajectory that is provided within the Five-Year Supply of Housing Land 2023-2028 September 2023 (EX007) is not justified or positively prepared as it does not meet the needs required. The plan, as evidenced by the proposed trajectory, is heavily reliant on strategic scale development with overly optimistic delivery rates. By seeking to meet the majority of the housing requirement on the proposed SUE at North Walsham means that the number of smaller and medium sites that could deliver earlier in the plan period have not been put forward as allocations.
- 2.2 This is evident given the Council are presently expecting to deliver 1,500 dwellings from the proposed North Walsham SUE between 2026/27 and 2039/40, which we consider to be unrealistic.
- 2.3 Within the Lichfields Start to Finish Report (February 2020) it was found that on average, the larger the site, the longer the process takes from when the first application is validated to the completion of the first dwelling. The largest allocation within the trajectory is by far the proposed North Walsham Sue (NW62) at 1,800 dwellings. The Council predicts that it will complete provide the first 30 dwellings in 2026/2027. Within the Start to Finish Report, it was found that sites of this size take on average 7 years to deliver the first dwelling. As the emerging Local Plan will not be adopted until 2024 or 2025 the first dwellings would not be delivered until 2031/32 using the timescales set out by Lichfields, reducing the number of dwellings that would be planned for and delivered within the early to mid part of the plan period.
- 2.4 As we have set out previously, it would take approximately 24.5 years to deliver all the proposed dwellings of the North Walsham SUE. This would result in the SUE not being completed until 2048, 12 years beyond the current proposed plan period end in 2036. If the SUE began to deliver dwellings in 2031/32, the revised projections of completed dwellings to the end of the Council's proposed plan period are as follows:
- 2031/32 – 30 dpa
 - 2032/33 – 60 dpa
 - 2033/34 – 100 dpa
 - 2034/35 – 160 dpa
 - 2035/36 – 100 dpa
- 2.5 Under the Council's trajectory 450 dwellings would be completed within the plan period from the SUE, leaving 1,350 dwellings to be completed after the plan period.

- 2.6 However, as suggested by the Lichfields Start to Finish Report sites of this size will deliver an average of 102 dwellings per annum. This will lead to there being 510 completions from 2031/32 until the end of the plan period in 2036, with 1,290 dwellings to be completed after the plan period.
- 2.7 If the plan period was extended to 2040, this would potentially deliver 918 dwellings from the SUE within the plan period and 882 dwellings after the plan period.
- 2.8 No evidence has been provided by the Council or North Walsham West Consortium to suggest that the anticipated rates of delivery from the SUE would be different to the timeframes as detailed within the Lichfields Start to Finish Report.
- 2.9 North Norfolk does not have any history in delivering large scale strategic sites such as that proposed as the North Walsham SUE. When the current Local Plan was adopted in 2011, Policy F01 Land North of Rudham Stile Lane, Fakenham was allocated for 800-900 dwellings. As is evident from the trajectory, construction is not due to start until 2027 (16 years post adoption of the 2011 plan), and completion in 2038, beyond the proposed new plan period. The Development Brief alone for that site took 4 years to be approved by the Council (2012 – 2016). This has all taken place in a period of generally favourable economic and market conditions and low interest rates over that period. The time it has taken for this site to come forward, which is roughly half the size of the proposed SUE at North Walsham, fills us with little confidence that the Council will see delivery come forward from the SUE as it anticipates.
- 2.10 This issue is not unique to North Norfolk. Delays to delivery of large, allocated strategic sites has been apparent across Norfolk as a whole and provide a useful comparison as to the challenges that the Council is likely to face with delivery from a large strategic SUE:
- In Kings Lynn and West Norfolk, Policy E2.1 (SADMP) West Winch SUE was adopted in 2016 allocating land for a minimum of 1,600 dwellings to be completed prior to 2026. As of 2022 when most recent published housing trajectory schedule was published not a single dwelling has come forward and it is projected that the first dwelling will not be completed until 2025/26 (10 years since policy adoption). No planning application has been approved as yet.
 - Breckland District Council adopted their Local Plan in 2012 and allocated land for the Thetford SUE for up to 5,000 dwellings. Despite the Local Plan being adopted 11 years ago, not a single dwelling has been completed and the first dwelling is not due to be completed until 2027/28 (15 years from adoption) according to the July 2023 Five-Year Housing Land Supply Statement.
 - Broadland adopted their Local Plan in 2016, where a site for approximately 3,000 dwellings was allocated under Policy GT16 (Growth Triangle Area Action Plan) at North Rackheath. The Annual Monitoring Report projected that the site will begin to deliver its first dwelling in 2024/25, up to 8 years after adoption. As of December 2023, no planning application has been made or any further progression towards delivery evident.

- South Norfolk adopted the Local Plan in 2016 including Policy LNGS1 (Long Stratton Area Action Plan) allocating land for up to 1,800 dwellings. The SUE, which is dependent on the delivery of a new bypass, has been granted planning permission in September 2023 but delivery is not expected until 2025, 9 years after the plan was adopted.

- 2.11 This above evidence highlights that the Council's proposed lead in times for delivery from the strategic sites, particularly the North Walsham SUE, is not realistic or justified based on the evidence available. We consider that the housing trajectory requires revision to make the plan sound.
- 2.12 In addition to the above, we consider that the areas of the district which are affected by nutrient neutrality will be faced with ongoing challenges to deliverability until mitigation measures have been put in place. We would therefore question whether these sites should be allocated within the Local Plan and included within the trajectory as they are arguably not deliverable.
- 2.13 Taking into account the information above, a revised trajectory should be provided to show realistically what can be achieved within the plan period, and to include provision of additional small and medium site allocations to support the long term growth and provision of the North Walsham SUE.
- 2.14 In the Council's final response to the Inspector's initial clarification letter (EX006), it states that they have considered the potential impact of nutrient neutrality in the supply of housing. We understand this covers 3,500 to 3,700 dwellings (EX003) to be delivered over the plan period. It is understood a mitigation strategy that involves credits is being purchased has been developed with neighbouring authorities should sites not be able to provide their own mitigation. We are not clear what evidence there is of the availability and quantum of credits that will be available, the likely cost and how this may relate to the delivery of the dwellings affected by nutrient neutrality detailed within the housing trajectory.

3. QUESTION 7.2 – FIVE-YEAR SUPPLY

7.2 Does the plan provide for a five-year supply of deliverable housing sites on adoption (say April 2025 for this purpose) against the housing requirement if it is a) 480 dpa, b) 531 dpa or c) some other figure? Is an appropriate allowance made for windfall sites and the non-implementation of commitments, and if not, what should these be? Has the need to secure nutrient neutrality been sufficiently taken into account?

- 3.1 It is our understanding following publication of the revised NPPF in December 2023 that this plan will be examined under the previous September 2023 NPPF due to the transitional arrangements put in place. However, on adoption of the plan the new NPPF will come into effect. The December 2023 NPPF states that Councils with an up-to-date local plan that has been assessed as having a five year land supply on adoption will, for the first five years, not be required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of supply.
- 3.2 We consider that this represents an important change and means that the consideration of the five year housing land supply on adoption of the plan is important because should supply not come forward as the Council expects, there is no requirement to bring forward additional sites to address any shortfall.

We have undertaken a review of the housing trajectory to remove sites which we do not consider meet the NPPF's definition of deliverable (e.g. awaiting as of yet unspecified nutrient neutrality mitigation).

- COR01 - Land between Norwich Road & Adams Lane, Corpusty – 38 dwellings. Nutrient neutrality issues.
- F01 – Rudham Stile Lane, Fakenham – 40 dwellings. Nutrient neutrality issues.
- HOR06 – Land east of Abbot Road, Horning – 26 dwellings. Drainage issues.
- ROU03/10 – Land at Back Lane, Roughton - 30 dwellings. Nutrient neutrality issues.
- PF/17/0729 – West Raynham – 94 dwellings. Nutrient neutrality issues.
- BRI01 & 02 – Briston – 65 dwellings. Nutrient neutrality issues.
- F10 – Land South of Barons Close, Fakenham - 55 dwellings. Nutrient neutrality issues.
- F03 – Land at A148/B1146, Fakenham – 65 dwellings. Nutrient neutrality issues.
- F02 – Wells Road, Fakenham - 40 dwellings. Nutrient neutrality issues.
- HV01B – Hoveton – 70 dwellings. Nutrient neutrality issues.
- Total of 523 dwellings removed from supply.

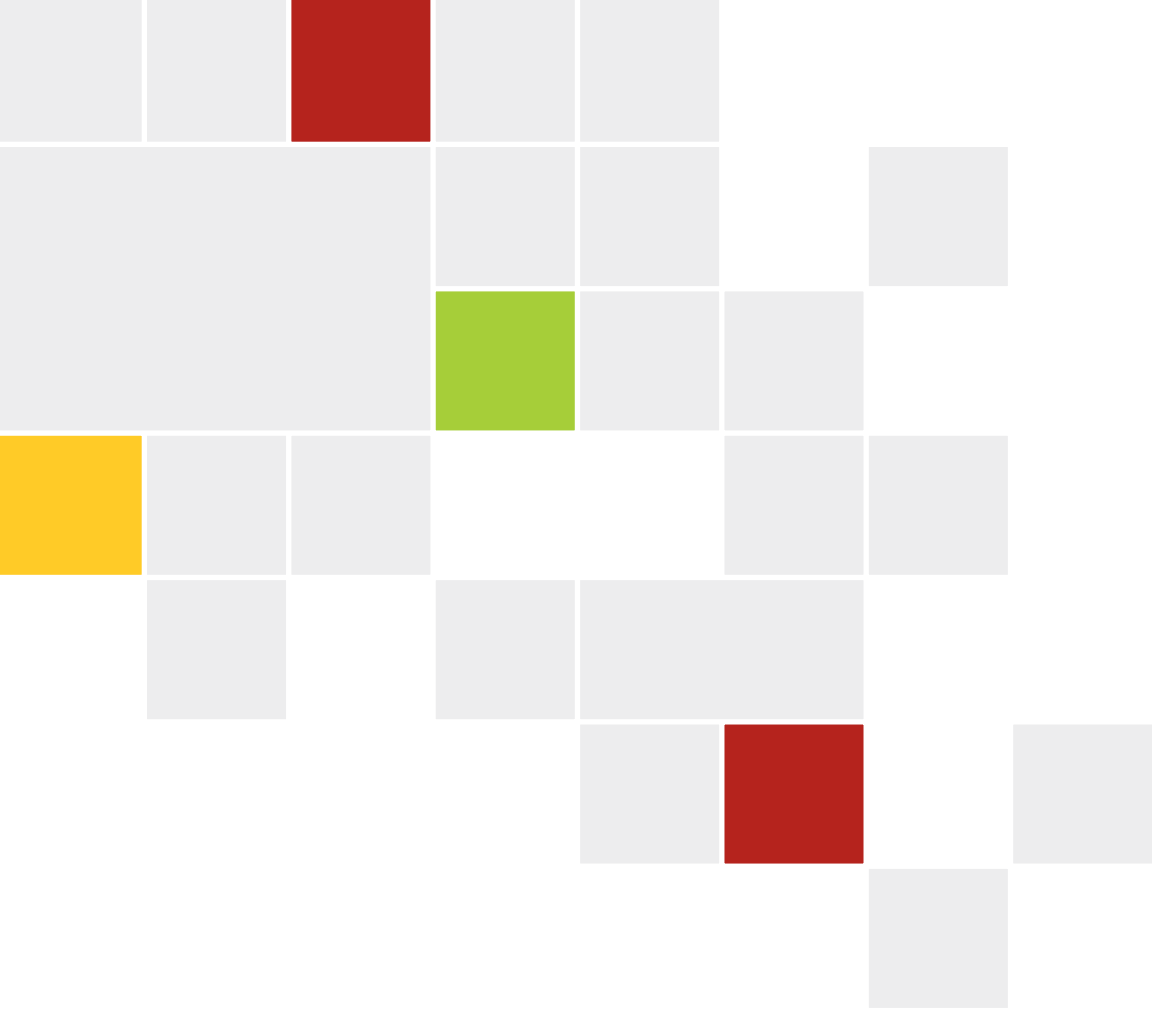
3.3 To carry out this review, the Council's method as set out within the Five-Year Supply of Housing Land (September 2023) (EX007) was used. In addition to the 2016 household projections, the ONS figures for the 2014 and 2018 household projections were calculated. Following this, the affordability ratio that the Council have used of 9.07 (2020) was applied in addition to a 5% delivery buffer that is required by the NPPF (September 2023). Following this, the need over a 20 year period was calculated and then the need over a 5 year period was calculated.

A. Requirement	480 dpa (LPA preferred figure on 2016 projections)	531 dpa (based on 2014 projections)
B. Five-year requirement (Ax5)	2,400	2,655
C. 5% buffer (B x 0.05)	120	133
D. Total Five-year requirement B+C)	2,520 (504 dpa)	2,788 (558 dpa)
E. Five-year supply*	2462	2462
F. Non-implementation rate of 5%	123	123
G. Total supply (E-F)	2,339	2,339
H. 5YHLS	4.64	4.19

**625 dwellings in committed supply. 707 from future allocations. 540 from windfall. 590 from small sites. Total supply – 2462 dwellings.*

- 3.4 Following removal of sites from the supply that are principally effected by nutrient neutrality issues, the Council would be left with either a 4.64 year supply of deliverable sites or a 4.19 year supply of deliverable sites dependant on which method of calculating the requirement is used.
- 3.5 As we have set out previously, the inclusion of the North Walsham SUE (NW62) in the five year land supply is considered to be unjustified on the basis of lead in times from the Lichfields Start to Finish Report and local evidence. This would remove a further 120 dwellings from the supply if the commencement date for this site is pushed back to 2031/32 as we consider it should be. This leads to a supply of only 4.40 years under the 480 dpa scenario or 3.97 years under the 531 dpa scenario.
- 3.6 The inclusion of a windfall allowance from 24/25 is likely to see significant double counting within the supply and should be included only from 2027/28. This would remove 3 years' worth of windfall at 135 dpa or a further 405 dwellings from the supply.

- 3.7 It would appear that no allowance has been made within the Council's five year housing land calculations for a non-implementation rate. Within our calculations above we have taken a conservative estimate and allowed for a 5% non-implementation rate, but we are aware other authorities have used up to 10% elsewhere previously.
- 3.8 In regard to the allowance the Council makes for windfall dwellings within the supply, it is appreciated that the Council have previously relied on high levels of windfall for delivery. This may be due to the lack of housing allocations within the previous Local Plan. The Council has made an allowance of 135 dpa within the supply for four years. This is a 50% reduction from the previous average of 295 dpa delivered as windfall between 2016 and 2023. Whilst we agree that the Council should provide a level of windfall within its supply, we would question what evidence there is that a 50% figure is an acceptable amount and whether a more conservative approach should be taken in light of the Council's new plan looking to deliver allocations that would presumably result in less windfall coming forward in the future. We would suggest that the Council needs to justify its approach further here in relation to windfall.
- 3.9 In relation to the buffer, the Council will now need to set out its approach to this in the context of the new December 2023 NPPF, with a buffer no longer required to be provided on adoption of the plan. We consider that it would be good practice to allow for fluctuations in delivery to continue with the inclusion of a buffer within the supply of a minimum of 5%. If the Council wished to provide a buffer, it would not be an unsound approach given the plan is being examined against the September 2023 version of the NPPF.



Boyer

1a Cedars Office Park, Butt Lane, Normanton, Loughborough, LE12 5EE |
01509 324 262 | midlands@boyerplanning.co.uk | boyerplanning.co.uk