
North Norfolk Local Plan

Local Plan Examination
Hearings Statement relating to:
Matter 7: Housing Trajectory, Five Year Supply &
HOU Policies 3,4,6-9

On behalf of:
Pigeon Investment Management Ltd



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NB1 All references to the NPPF in this Statement (unless explicitly noted) are to the September 2023 version of the Framework, as paragraph 230 of the latest, December 2023, version of the Framework sets out that (emphasis added): “*The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework ...*” However, it should be noted that, on adoption of the Plan, the December 2023 version of the Framework will take effect.

Issue: Whether the overall housing trajectory is justified, whether a five-year supply of deliverable housing sites would be provided on adoption and whether housing policies 3, 4, 6-9 are positively prepared, justified, effective and consistent with national policy.

Question 7.1: In the light of the site-by-site discussion, is the overall housing trajectory in the plan justified by the evidence? ...

NB2 The Council has published virtually no evidence to justify the latest trajectory as contained in EX007. Question 7.1 refers to the evidence that will presumably be forthcoming from the site-by-site discussion – i.e. Matter 5. In light of this, Savills reserves the right to update our response to Question 7.1, and subsequent questions relating to Matter 7, to take into account any new evidence.

For the time being, no.

The Context for and Purpose of the Question

It is assumed that this question relates primarily to the test of soundness that the Plan be ‘effective’, i.e. that the Plan be (generally) (NPPF, para. 35) (emphasis added):

“deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground ...”

This is a different test of ‘deliverability’ to that which must be undertaken in relation to the 5-year housing land supply (5YHLS), the NPPF (para. 68) requiring that:

“... Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period³⁴;*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”*

In this context, it should be noted that the questions as set out for the site-by-site discussion under Matter 5 address

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whether the sites should be considered 'deliverable' in accordance with paragraph 35 of the NPPF, rather than in accordance with paragraph 68 and the definition within the glossary of the NPPF. This is notwithstanding Standard Question (k) that asks (emphasis added):

“Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? ...”

Specifically, the question asks whether the site is 'deliverable' within the plan period, not 'deliverable' within the next 5 years.

As such, this question highlights the above point, that it relates to the plan period, rather than to the first 5 years of the plan period (i.e. rather than to the 5YHLS). Indeed it would be exceptional if the Council were able to demonstrate that the entire housing supply for the entire plan period already met the test of 'deliverability' necessary for the purposes of demonstrating a 5YHLS.

As such (and noting NB1 above), it is considered that it is necessary for a two-layered assessment of 'deliverability' to be undertaken:

- i) Firstly, as to whether a site is deliverable over the plan period (i.e. as per NPPF para. 35 / Standard Question (k)); and
- ii) Secondly, as to whether there is a 5-year supply of specific deliverable sites (i.e. as per NPPF para. 68 / NPPF Glossary definition of 'deliverable').

We discuss the latter of these – i.e. the 5YHLS, under Question 7.2 below.

The Trajectory

At Appendix 3 to this Statement we have set out our high-level analysis of the housing trajectory and 5YHLS position for the period 2023 – 2028 (1st April 2023 to 31st March 2028), as contained within Examination Document EX007.

In summary, we have identified that:

- Two sites that should be removed from the trajectory – RAF West Raynham (94 dwellings) due to underlying deliverability concerns, and Stiffkey Road, Warham (12 dwellings) as the permission appears to have lapsed.
- The projected delivery from some sites should be delayed, which has an effect on the 5YHLS (see Question 7.2 below) but not overall (i.e. the trajectory will still show the sites being delivered in full during the plan period).
- The likely adoption of the Plan (assuming it is adopted) around April 2025 should also be taken into account. Site NW62 – Land west of North Walsham is a site of 1,800 dwellings and it is considered unlikely that planning permission will be granted before the adoption of the Local Plan. At present, the trajectory shows delivery starting in 2026/27, just one year after the assumed adoption of the Plan. Even in a best case scenario this is considered extremely unlikely with it being far more likely that the actual delivery of homes will commence three years from the adoption of the Plan in 2028/29. This would reduce overall delivery from the site by 260 dwellings (whether the plan period runs to 31st March 2036 or 2040).

- We have identified that the windfall allowance as included in the trajectory in EX007 should be reduced by 270 dwellings.

In addition, the next part of Question 7.1 (see below) raises the issue of nutrient neutrality, and the significant impact that this might have on the trajectory.

... How has the trajectory for both large and small sites been affected by the need to secure nutrient neutrality and is this realistic?

Table 1 as included in both Examination Document EX003 and subsequently the 'North Norfolk Local Plan HRA Addendum, August 2023' as included within Document EX006, set out that the Council considers that between 3,515 and 3,715 dwellings are affected by nutrient neutrality concerns. At present, it is not clear whether or when these concerns will be overcome, hence the deliverability of the sites identified remains questionable. While the Council has entered into a joint venture (Norfolk Environmental Credits) with the other Norfolk Councils affected by nutrient neutrality (Breckland Council, Broadland District Council and South Norfolk Council) with the intention of trading credits that will provide mitigation, at the time of writing there are still no credits available to purchase. Furthermore, the only confirmed mitigation scheme is within the River Yare catchment, as opposed to the River Bure and River Wensum catchments, which affect North Norfolk. There are no confirmed mitigation schemes within the River Yare or the River Wensum catchments and no confirmed timetable for any such mitigation within these catchments to be provided.

Question 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?

NB3 Prior to responding to this question it is worth noting that the context for it is paragraph 68 of the NPPF, as noted above in relation to Question 7.1.

NB4 It should be noted that the provisions of paragraph 226 of the December 2023 NPPF only relate to decision-taking, not plan-making.

NB5 It should also be noted that, on adoption of the Local Plan, paragraph 76 of the December 2023 NPPF now explains that the Council will not be required to identify and update annually a 5YHLS until 5 years following adoption, if the adopted plan identifies at least a 5-year supply of specific deliverable sites at the time the examination is concluded. (The reference to the 'conclusion' of the Examination is taken as being a reference to the issuing of an Inspector's Report.)

If the Examination identifies that, at the point it is concluded, the Council is able to demonstrate a 5YHLS, and the Plan is adopted on 1st April 2025, then the Council would not need to otherwise demonstrate a 5YHLS until 1st April 2030.

This places significantly greater emphasis on the need to ensure that the assessment of the 5YHLS conducted during the Examination is very robust and that in the context of the definition of 'deliverable' in the Glossary to the NPPF, that housing delivery will take place as projected.

In short, the immunity from having to demonstrate a 5YHLS now introduced by paragraph 76 of the December 2023 NPPF requires that a full, robust, assessment of the 5YHLS, with reference to the definition of 'deliverable' in the Glossary to the NPPF, be carried out as part of the Examination of the Plan, and that a 5YHLS can be demonstrated at the point the Examination is concluded.

No.

Context

In relation to Question 7.2, it is suggested that the Plan could be adopted in April 2025, whilst in relation to Question 1.12 it is suggested that adoption could, hopefully, take place some time in 2024. This follows the previous reference in EX002 to the need to demonstrate the 5YHLS as at 1st April 2024 and 1st April 2025. It is thus clear that the 5YHLS as will exist on these two dates needs to be considered.

Predicting a 5YHLS figure at some point in the future is difficult as the existence of permissions and/or clear evidence of deliverability is unknown. As such, it is considered possible that the 5YHLS will need to be revisited closer to the end of the Examination, to ensure that there will be a 5-year supply of specific deliverable sites at the conclusion of the Examination.

The Council has not sought to calculate the 5YHLS as at 1st April 2024 and 1st April 2025, but has simply produced a trajectory. At paragraph 4.5 of EX006 it states:

"... The updated trajectories also demonstrate the five-year housing land supply position on adoption of the plan as at April 2024 or April 2025, and beyond."

So far as Savills can see, they do not.

The 5YHLS Requirement

The Baseline Requirement

Question 7.2 refers to three possible baseline housing requirement figures:

- a) The figure of **480 dpa** is the housing requirement figure proposed in the draft Local Plan. It is notable that the latest 5YHLS calculation provided by the Council in EX007 (see the table on page 4) is not based on this figure, but rather on a requirement of 457 dpa. However, given that the draft Plan makes it very clear that the proposed housing requirement is 480 dpa, we have not considered the 5YHLS in the context of a requirement of 457 dpa.
- b) The figure of **531 dpa** is the Standard Method LHN figure identified by the HBF in its representations to the Regulation 19 consultation. However, as we set out in our Matter 3 Statement, as at 1st April 2023 the (capped) up-to-date Standard Method LHN Figure is 560 dpa. Whilst we have considered the 5YHLS in the context of a housing requirement of 531 dpa, we see no justification for any such figure.
- c) With regard to 'some other figure', as noted above, the (capped) up-to-date Standard Method LHN Figure is **560 dpa**. We have therefore considered the 5YHLS in the context of this figure. However, we also consider that the 5YHLS should be considered in the context of two other possible housing requirement figures.

The housing requirement figure of 480 dpa set out in the draft Local Plan includes a 5% buffer that has been added on to the baseline housing need figure (see Background Paper C1, Figure 2 on page 7, Stage 2, and elsewhere). As set out in our Matter 3 Statement (see Appendix 2, Table App1, Column 7), an up-to-date calculation would result in a housing need figure of 482 dpa, not 457 dpa (see (a) above). As we set out, adding a 5% buffer to this figure would result in a housing requirement figure of **506 dpa**. Given that this is the up-to-date figure stemming from the Council's proposed approach, and notwithstanding that Savills disagrees with the use of the 2016 household projections, we consider that the 5YHLS should be assessed in this context.

Adopting the same approach, adding a 5% buffer to the (capped) housing need figure of 560 dpa results in a potential housing requirement of **588 dpa**. This is the Council's proposed approach, but using the 2014 household projections as required by national policy. As such, we consider it appropriate to consider the 5YHLS in this context.

We also considered the potential for a figure stemming from the 2018 household projections. As set out in our Matter 3 Statement (again Appendix 2, Table App1), this approach also results in a (capped) housing need figure of 560 dpa, and with a 5% buffer added, 588 dpa.

Shortfall to Date

Planning Practice Guidance (PPG) explains (ID: 68-031-20190722):

"... The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgfield approach), then the appropriate buffer should be applied. ..."

The plan period of the submitted Plan is 2016 – 2036, although it has been suggested that a plan period of 2020 – 2040 would be more appropriate.

Appendix B to Examination document EX006 sets out that between 1st April 2016 and 31st March 2023 a total of 3,264 net additional dwellings were delivered, with 1,311 delivered between 1st April 2020 and 31st March 2023.

Given that it is impossible to know how many homes will be delivered between 1st April 2023 and 1st April 2024 or 2025, Savills has used the total projected delivery for the years 2023/24 and 2024/25. The trajectory included in EX007 identifies projected delivery of 244 and 550 dwellings in these years. However, factoring in Savills conclusions on the trajectory as set out at Appendix 3 hereto, the latter of these figures reduces to 385¹.

At Appendix 1 to this Statement we assess this past / projected delivery against the range of housing requirement figures identified above. As is evident, the wide variety of different parameters (Local Plan base date, baseline housing requirement figure, and the point at which the 5YHLS is being demonstrated) all serve to produce a wide variety of shortfall figures.

The Buffer

¹ 550 dwellings – 135 windfall allowance – 30 dwellings on emerging allocations = 385

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Footnote 34 to paragraph 68 explains that the calculation of the 5YHLS requirement should include: “... *an appropriate buffer, as set out in paragraph 74 ...*”, and goes on to cross-reference the definition of ‘deliverable’ in the glossary to the NPPF.

The 2021 Housing Delivery Test (HDT) measurement and the 2022 HDT measurement for North Norfolk were 100% and 95% respectively. Based on these results, the NPPF requires that a 5% buffer be incorporated into the calculation of the 5YHLS requirement.

Summary

At Appendix 2 hereto we have calculated the 5YHLS requirement based on the different parameters discussed above. The results of these calculations are summarised below.

	v. 480 dpa*	v. 531 dpa*	v. 560 dpa	v. 506 dpa	v. 588 dpa
Local Plan Base Date 1 st April 2016					
Requirement as at 1 st April 2023	2621	3264	3629	2949	3982
Requirement as at 1 st April 2024	2869	3565	3961	3224	4343
Requirement as at 1 st April 2025	2969	3719	4144	3351	4556
Local Plan Base Date 1 st April 2020					
Requirement as at 1 st April 2023	2656	3084	3328	2874	3563
Requirement as at 1 st April 2024	2904	3386	3660	3149	3924
Requirement as at 1 st April 2025	3003	3539	3843	3276	4137

* Those figures faded out are so because the baseline figures (480 and 531 dpa) are out-of-date and should be superseded (by 506 and 560 dpa respectively).

The 5-Year Supply

At 1st April 2023

EX007 identifies a total projected supply from 1st April 2023 of 3,095 dwellings, but notes (para. 4.2) that supply on the proposed allocations should not be included in the 5-year supply until the Plan is adopted. As such, it identifies a reduced deliverable supply of 1,983 dwellings.

At Appendix 3 to this Statement we have set out our high-level analysis of the Council’s updated 5-year housing land supply for the period 2023 – 2028 (1st April 2023 to 31st March 2028) as set out in EX007. That analysis suggests that the 5-year supply should be reduced as set out below.

	Projected 5-Year Supply (EX007)	Savills Assessment	Projected 5-Year Supply (Savills)
Existing Local Plan allocations and planning permissions (shaded grey)	853	-210	643

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Emerging Local Plan allocations (shaded red)	1,112	-1,112	0
Small sites (shaded pink)	590	No change	590
Windfall allowance (shaded orange)	540	-270	270
Total	3,095	-1,592	1,503

At 1st April 2024

The trajectories in EX006 and EX007 project a supply from 1st April 2024 of 3,511 dwellings, including from the proposed allocations. However, as discussed above and in Appendix 3, Savills considers that this figure should be reduced for the following reasons:

- Two sites should be removed from the supply (-106 dwellings).
- The supply from Site NW62 should be delayed by two years (-160 dwellings).
- Two years of windfall allowance should be removed from the supply (-270 dwellings).

Overall, this reduces the projected supply to 2,975 dwellings.

At 1st April 2025

The trajectories in EX006 and EX007 project a supply from 1st April 2025 of 3,673 dwellings, including from the proposed allocations. However, as discussed above and in Appendix 3, Savills considers that this figure should be reduced for the following reasons:

- Two sites should be removed from the supply (-106 dwellings).
- The supply from Site NW62 should be delayed by two years (-260 dwellings).
- One years of windfall allowance should be removed from the supply (-135 dwellings).

Overall, this reduces the projected supply to 3,172 dwellings.

The 5YHLS

It is noted that at paragraph 4.2 of EX007 the Council states:

“The deliverable supply of housing sites has reduced in the last two years. This can be attributed to a number of factors but most significantly relates to ... the impacts of new requirements to demonstrate nutrient neutrality before new planning permissions can be granted in large parts of the district. Consequently, the Authority is only currently able to demonstrate 4.13 years of deliverable housing supply.”

The Council continues (EX007, para. 4.2):

“... As the Local Plan is currently being examined these emerging sites (proposed allocations) have not currently been included in the deliverable supply. If the deliverable supply on these sites were to be included the land supply position improves to 6.45 years.”

Assuming a 5YHLS requirement of 2,400 dwellings as per the Table on page 4 of EX007, and a total 5-year supply of 3,095 dwellings as per the trajectory at Appendix 2 to EX007 (which includes all emerging allocations), the Document arrives at a figure of 6.45 years.

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This is a completely meaningless figure – the Council itself accepts that the emerging sites cannot currently be included in the 5-year supply, and by the time the Plan is adopted (assuming it is) the correctly-calculated 5YHLS requirement will be different.

We have set out below a comparison between the different 5YHLS requirement figures, and the projected supply, as per our discussions above.

	v. 480 dpa*	v. 531 dpa*	v. 560 dpa	v. 506 dpa	v. 588 dpa
Local Plan Base Date 1 st April 2016					
Requirement as at 1 st April 2023	2621	3264	3629	2949	3982
Supply	1053	1053	1053	1053	1053
5YHLS (years)	2.01	1.61	1.45	1.79	1.32
Requirement as at 1 st April 2024	2869	3565	3961	3224	4343
Supply**	2975	2975	2975	2975	2975
5YHLS (years)	5.18	4.17	3.76	4.61	3.43
Requirement as at 1 st April 2025	2969	3719	4144	3351	4556
Supply**	3172	3172	3172	3172	3172
5YHLS (years)	5.34	4.26	3.83	4.73	3.48
Local Plan Base Date 1 st April 2020					
Requirement as at 1 st April 2023	2656	3084	3328	2874	3563
Supply	1053	1053	1053	1053	1053
5YHLS (years)	1.98	1.71	1.58	1.83	1.48
Requirement as at 1 st April 2024	2904	3386	3660	3149	3924
Supply**	2975	2975	2975	2975	2975
5YHLS (years)	5.12	4.39	4.06	4.72	3.79
Requirement as at 1 st April 2025	3003	3539	3843	3276	4137
Supply**	3172	3172	3172	3172	3172
5YHLS (years)	5.28	4.48	4.13	4.84	3.83

* Again, we would note that those figures faded out are so because the baseline figures (480 and 531 dpa) are out-of-date and should be superseded (by 506 and 560 dpa respectively).

** It should also be very clearly noted that the 'supply' stated, assumes that all emerging allocations are deemed to meet the NPPF paragraph 68 / Glossary definition of deliverability, whereas in practice they will not (to be updated post Matter 5). In short, the supply set out below should be regarded as the **best case** and is only likely to reduce.

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Summary

In summary, it is clear that the Council is currently unable to demonstrate a 5YHLS, and will be unable to demonstrate a 5YHLS on adoption of the Plan, **even if all** emerging allocations are deemed to meet the NPPF paragraph 68 / Glossary definition of deliverability. In practice, it is likely that the shortfall in the 5YHLS will be even greater than identified above as not all allocation sites will meet the NPPF paragraph 68 / Glossary definition of deliverability.

Is an appropriate allowance made for windfall sites and the non-implementation of commitments, and if not, what should these be?

Windfall Allowance

No.

For the reasons we set out in more detail at Appendix 3 to this Statement, it is considered that the projected delivery from windfall sites should be deleted from Years 2 and 3 of the 5-year period (2024/25 and 2025/26) as shown below, and thus the total contribution to the 5-year supply reduced by 270 dwellings, from 540 to 270 dwellings.

Source of Supply	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Small sites with planning permission	150	189	187	61	3	590
Windfall allowance	0	435 0	435 0	135	135	540 270
Total	150	324 189	322 187	196	138	1,130 860

Non-Implementation Allowance

As per our response to the first part of Matter 3, Question 3.9: The Council has not published any information on the number of homes that are permitted, but not delivered – i.e. the ‘non-implementation’ rate. However, it is inevitable that some sites on which permission is granted will not be developed. As a consequence, it is generally agreed that planned housing supply should include a ‘buffer’ of at least 5% and ideally at least 10% above the minimum housing requirement, to provide flexibility and ensure that the LPA is able to facilitate the delivery of the housing needed.

Has the need to secure nutrient neutrality been sufficiently taken into account?

No.

Table 1 as included in both Examination Document EX003 and subsequently the ‘North Norfolk Local Plan HRA Addendum, August 2023’ as included within Document EX006, set out that the Council considers that between 3,515 and 3,715 dwellings are affected by nutrient neutrality concerns. At present, it is not clear whether or when these concerns will be overcome, hence the deliverability of the sites identified remains questionable.



Appendices



Appendix 1: Comparison of Shortall in Delivery to Date

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Appendix 1: Comparison of Shortall in Delivery to Date

Local Plan Base Date: 1st April 2016

At 1st April 2023

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2016/17	447	-33	-84	-113	-59	-141
2017/18	561	81	30	1	55	-27
2018/19	526	46	-5	-34	20	-62
2019/20	419	-61	-112	-141	-87	-169
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274
Total:	3264	-96	-453	-656	-278	-852

At 1st April 2024

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2016/17	447	-33	-84	-113	-59	-141
2017/18	561	81	30	1	55	-27
2018/19	526	46	-5	-34	20	-62
2019/20	419	-61	-112	-141	-87	-169
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274
2023/24	244	-236	-287	-316	-262	-344
Total	3508	-332	-740	-972	-540	-1196

At 1st April 2025

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2016/17	447	-33	-84	-113	-59	-141
2017/18	561	81	30	1	55	-27

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2018/19	526	46	-5	-34	20	-62
2019/20	419	-61	-112	-141	-87	-169
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274
2023/24	244	-236	-287	-316	-262	-344
2024/25	385	-95	-146	-175	-121	-203
Total	3893	-427	-886	-1147	-661	-1399

Local Plan Base Date: 1st April 2020

At 1st April 2023

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274
Total	1311	-129	-282	-369	-207	-453

At 1st April 2024

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274
2023/24	244	-236	-287	-316	-262	-344
Total	1555	-365	-569	-685	-469	-797

At 1st April 2025

	Delivery	v. 480 dpa	v. 531 dpa	v. 560 dpa	v. 506 dpa	v. 588 dpa
2020/21	481	1	-50	-79	-25	-107
2021/22	516	36	-15	-44	10	-72
2022/23	314	-166	-217	-246	-192	-274

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2023/24	244	-236	-287	-316	-262	-344
2024/25	385	-95	-146	-175	-121	-203
Total	1940	-460	-715	-860	-590	-1000



Appendix 2: 5YHLS Requirement Calculation

Appendix 2: 5YHLS Requirement Calculation

Local Plan Base Date: 1st April 2016

At 1st April 2023

	Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A Baseline housing requirement	480	531	560	506	588
B Years to date (2016/17-2022/23)	7	7	7	7	7
C Baseline requirement to date (A x B)	3360	3717	3920	3542	4116
D Delivery to date	3264	3264	3264	3264	3264
E Shortfall to Date (C - D)	96	453	656	278	852
F 5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G 5-Year Baseline Requirement + Shortfall to Date (E + F)	2496	3108	3456	2808	3792
H 5% Buffer (F x 0.05)	124.8	155.4	172.8	140.4	189.6
I 5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	2620.8	3263.4	3628.8	2948.4	3981.6
J 5YHLS Requirement (rounded up)	2621	3264	3629	2949	3982

At 1st April 2024

	Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A Baseline housing requirement	480	531	560	506	588
B Years to date (2016/17-2023/24)	8	8	8	8	8
C Baseline requirement to date (A x B)	3840	4248	4480	4048	4704
D Delivery to date	3508	3508	3508	3508	3508
E Shortfall to Date (C - D)	332	740	972	540	1196
F 5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G 5-Year Baseline Requirement + Shortfall to Date (E + F)	2732	3395	3772	3070	4136
H 5% Buffer (F x 0.05)	136.6	169.75	188.6	153.5	206.8
I 5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	2868.6	3564.75	3960.6	3223.5	4342.8
J 5YHLS Requirement (rounded up)	2869	3565	3961	3224	4343

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At 1st April 2025

		Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A	Baseline housing requirement	480	531	560	506	588
B	Years to date (2016/17-2024/25)	9	9	9	9	9
C	Baseline requirement to date (A x B)	4320	4779	5040	4554	5292
D	Delivery to date	3893	3893	3893	3893	3893
E	Shortfall to Date (C - D)	427	886	1147	661	1399
F	5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G	5-Year Baseline Requirement + Shortfall to Date (E + F)	2827	3541	3947	3191	4339
H	5% Buffer (F x 0.05)	141.35	177.05	197.35	159.55	216.95
I	5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	2968.35	3718.05	4144.35	3350.55	4555.95
J	5YHLS Requirement (rounded up)	2969	3719	4145	3351	4556

Local Plan Base Date: 1st April 2020

At 1st April 2023

		Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A	Baseline housing requirement	480	531	560	506	588
B	Years to date (2020/21-2022/23)	3	3	3	3	3
C	Baseline requirement to date (A x B)	1440	1593	1680	1518	1764
D	Delivery to date	1311	1311	1311	1311	1311
E	Shortfall to Date (C - D)	129	282	369	207	453
F	5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G	5-Year Baseline Requirement + Shortfall to Date (E + F)	2529	2937	3169	2737	3393
H	5% Buffer (F x 0.05)	126.45	146.85	158.45	136.85	169.65
I	5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	2655.45	3083.85	3327.45	2873.85	3562.65
J	5YHLS Requirement (rounded up)	2656	3084	3328	2874	3563

At 1st April 2024

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		Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A	Baseline housing requirement	480	531	560	506	588
B	Years to date (2020/21-2023/24)	4	4	4	4	4
C	Baseline requirement to date (A x B)	1920	2124	2240	2024	2352
D	Delivery to date	1555	1555	1555	1555	1555
E	Shortfall to Date (C - D)	365	569	685	469	797
F	5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G	5-Year Baseline Requirement + Shortfall to Date (E + F)	2765	3224	3485	2999	3737
H	5% Buffer (F x 0.05)	138.25	161.2	174.25	149.95	186.85
I	5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	2903.25	3385.2	3659.25	3148.95	3923.85
J	5YHLS Requirement (rounded up)	2904	3386	3660	3149	3924

At 1st April 2025

		Q. 7.2 (a)	Q. 7.2 (b)	Q. 7.2 (c)	Q. 7.2 (c)	Q. 7.2 (c)
A	Baseline housing requirement	480	531	560	506	588
B	Years to date (2020/21-2024/25)	5	5	5	5	5
C	Baseline requirement to date (A x B)	2400	2655	2800	2530	2940
D	Delivery to date	1940	1940	1940	1940	1940
E	Shortfall to Date (C - D)	460	715	860	590	1000
F	5-Year Baseline Requirement (A x 5)	2400	2655	2800	2530	2940
G	5-Year Baseline Requirement + Shortfall to Date (E + F)	2860	3370	3660	3120	3940
H	5% Buffer (F x 0.05)	143	168.5	183	156	197
I	5-Year Baseline Requirement + Shortfall to Date + 5% Buffer (F + G)	3003	3538.5	3843	3276	4137
J	5YHLS Requirement (rounded up)	3003	3539	3843	3276	4137



Appendix 3: High-Level Analysis of the Housing Trajectory and 5-Year Supply

Appendix 3: High-Level Analysis of the Housing Trajectory and 5-Year Supply

The housing trajectory at Appendix B to EX007 seemingly separates delivery into four categories:

- Existing Local Plan allocations and planning permissions (shaded grey) (853 dwellings)
- Emerging Local Plan allocations (shaded red) (1,112 dwellings)
- Small sites (shaded pink) (590 dwellings)
- Windfall allowance (shaded orange) (540 dwellings)

This totals an overall projected 5-year supply of 3,095 dwellings.

Existing Local Plan Allocations and Planning Permissions (853 dwellings)

Savills has undertaken a high-level analysis of the sites listed in the trajectory and has identified issues with the following:

- Land between Norwich Road & Adams Lane, Corpusty (COR01; PF/21/1990) (38 dwellings in 5-year supply)

A Category (b) site by virtue of the existing Local Plan allocation. Whilst an application for planning permission was submitted on this site on 19/07/21, the application webpage shows no activity since 11/03/22, and it is again understood that there are nutrient neutrality issues that remain to be resolved. Conclusion: Reduce supply by 38 dwellings.

- Land North of Rudham Stile Lane, Fakenham (F01; PO/17/0680) (40 dwellings in 5-year supply)

A Category (b) site by virtue of the existing Local Plan allocation. Whilst outline planning permission was granted in October 2021 no applications for the approval of Reserved Matters have yet been submitted (the deadline for the submission of the first of these is later this year) and cannot be submitted until certain conditioned matters have been addressed, with some condition discharge applications yet to be submitted. It is also understood that there are significant issues regarding nutrient neutrality that remain to be addressed. Until the unresolved matters are addressed, we consider that there is not clear evidence of deliverability such that there is a realistic prospect to delivery as projected and as such the site should be removed from 5-year supply. Conclusion: Reduce supply by 40 dwellings.

- Land East of Abbot Road, Horning (HOR06; PO/11/1505) (26 dwellings in 5-year supply)

A Category (b) site by virtue of the existing Local Plan allocation. The referenced application for outline permission was withdrawn on 26/09/23 and at the time of writing there is no other clear evidence of deliverability. Conclusion: Reduce supply by 26 dwellings.

- RAF West Raynham, Massingham Road, West Raynham (PF/17/0729) (94 dwellings in 5-year supply)

Neither a Category (a) or (b) site. The application was submitted on 10/05/17 and remains undetermined. The application webpage shows no activity since 22/10/20. The comments in the trajectory refer to a

resolution to grant permission, however this resolution dates from 19/04/18 and as such Savills considers that it cannot be relied upon. The comments note that the site is delayed by nutrient neutrality and infrastructure concerns yet the former has only recently become a consideration thus it is considered likely that there are also other significant underlying issues that remain to be resolved. Conclusion: Reduce supply by 94 dwellings)

- Development Land east of Stiffkey Road, Warham (PF/19/0989) (12 dwellings in 5-year supply)

Full planning permission granted on 11/12/19. Implementation was required by 11/12/22, and this does not appear to have taken place. As such, the permission appears to have lapsed. Conclusion: Reduce supply by 12 dwellings.

Conclusion: Reduce supply by 210 dwellings

Emerging Local Plan Allocations (1,112 dwellings)

So far as Savills is aware, no extant full planning permissions exist in relation to any of these sites. As such, none of these sites fall within NPPF deliverability Category (a) and cannot be included in the 5YHLS by default.

Further, so far as Savills is aware, no extant outline planning permissions exist in relation to any of these sites. Until such time as the sites are allocated, they therefore also do not fall within NPPF deliverability Category (b), but rather fall within Category (c) (see discussion above). On adoption of the Plan, all sites would fall within Category (b) by virtue of the proposed allocations (assuming the site is not deleted from the Plan).

Whether falling within Category (b) or (c), no housing delivery from any of these sites should be included unless there is clear, tangible and robust evidence of deliverability.

The Council has not published any such evidence and thus, at the time of writing, no delivery from any of these sites should be included (see above regarding the onus to demonstrate). However, it is anticipated that additional evidence will be forthcoming during the Examination (which should then be published / included by the Council in support of its updated 5YHLS) that might constitute clear evidence of deliverability, and thus justify the inclusion of housing delivery from a site in the 5-year supply.

As such, Savills reserves the right to issue an update to this assessment following the Matter 5 Hearing sessions.

Conclusion: Reduce supply by 1,112 dwellings (subject to review following Matter 5)

Projected Timeframe for Delivery

Notwithstanding this, Savills also has concerns regarding the year that some sites are projected to deliver. In short, insufficient time appears to have been allowed for applications to be submitted, planning permission to be granted, conditions to be discharged, and site infrastructure to be delivered, all of which is necessary ahead of housing completions.

Given that 2024/25 commences within a few months, and that no planning permissions have been issued on any of the sites (with the exception of site SH07 where full permission was granted on 20/05/22), it would appear unlikely

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that housing completions will take place as projected during 2024/25 or 2025/26 (the exception being site SH07 where full permission was granted on 20/05/22) – a lead-in time of 2 years prior to first completions being reasonable.

On this basis, the projected delivery from the following sites should be delayed by a year with the noted effect to the 5-year supply: F10 (-15 dwellings); NW01/8 (-40 dwellings); SH18/1B (-8 dwellings); and ST19/A (-30 dwellings) (we have only noted those sites where there would be an impact on the 5-year supply). Overall, this would reduce the projected 5-year supply by 93 dwellings but not have any impact overall (all sites are projected to complete sufficiently ahead of the end of the plan period such that a one-year delay would still see them fully completed).

Setting to one side the sites in Small Growth Villages (for which there is no detail in the trajectory), there would also be a one-year delay to the following sites, although no impact on the 5-year supply, or overall: BLA04/A (10 dws), H17 (13 dws); MUN03 (10 dws); ST23/2 (30 dws); W01/1 (20 dws) and W07/1 (30 dws).

The above delay would reduce the projected delivery during 2024/25 by a total of 30 dwellings and during 2025/26 by a total of 173 dwellings.

In addition, the likely adoption of the Plan (assuming it is adopted) around April 2025 should also be taken into account. Site NW62 – Land west of North Walsham is a site of 1,800 dwellings and it is considered unlikely that planning permission will be granted before the adoption of the Local Plan – an application does not yet appear to have been submitted. At present, the trajectory shows delivery starting in 2026/27, just one year after the assumed adoption of the Plan. Even in a best case scenario this is considered extremely unlikely with it being far more likely that the actual delivery of homes will commence three years from the adoption of the Plan in 2028/29. This would reduce the projected 5-year supply by 90 dwellings, and reduce overall delivery from the site by 260 dwellings (whether the plan period runs to 31st March 2036 or 2040).

Small Sites (590 dwellings)

No detail is provided regarding these sites. It is suggested that the Council be requested to provide the detail of these sites. For the time being, Savills has assumed that there are extant planning permissions.

Conclusion: Retain at 590 dwellings (subject to review)

Windfall Allowance (540 dwellings)

Examination Document EX007 sets out the approach taken to windfall sites at Appendix A.

At paragraph A1.12 the Document sets out an 'estimate' of the future supply of housing on windfall sites, equating to a total of 135 dpa.

The housing trajectory at Appendix B of the document includes the anticipated delivery of this 135 dpa from 2024/25 onwards – i.e. in Years 2, 3, 4 and 5 of the 5-year period. However, housing delivery on windfall sites over the next few years is likely to be on sites that already have planning permission, and it is generally accepted that a windfall allowance should not be included in a housing trajectory for the first two or three years – i.e. it should only be included for the latter two or three years of the 5-year period, to avoid 'double-counting'. This principle appears to be recognised by the Council, which has not included a windfall allowance for the first year – 2023/24.

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Noting the analysis and discussion in Appendix A it would seem likely that windfall sites are likely to be small sites of less than 10 dwellings. The projected delivery from small sites that already have planning permission, as set out in the housing trajectory would appear to corroborate the principle of not including a windfall allowance in Years 1, 2 or 3 of the 5-year period.

As such, it is considered that the projected delivery from windfall sites should be deleted from Years 2 and 3 of the 5-year period (2024/25 and 2025/26) as shown below, and thus the total contribution to the 5-year supply reduced by 270 dwellings, from 540 to 270 dwellings.

Source of Supply	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Small sites with planning permission	150	189	187	61	3	590
Windfall allowance	0	435 0	435 0	135	135	540 270
Total	150	324 189	322 187	196	138	1,130 860

Conclusion: Reduce supply by 270 dwellings.

Overall Conclusion (5YHLS)

In summary:

- Two sites that should be removed from the trajectory – RAF West Raynham (94 dwellings) due to underlying deliverability concerns, and Stiffkey Road, Warham (12 dwellings) as the permission appears to have lapsed.
- The projected delivery from some sites should be delayed, which has an effect on the 5YHLS (see Question 7.2 below) but not overall (i.e. the trajectory will still show the sites being delivered in full during the plan period).
- The likely adoption of the Plan (assuming it is adopted) around April 2025 should also be taken into account. Site NW62 – Land west of North Walsham is a site of 1,800 dwellings and it is considered unlikely that planning permission will be granted before the adoption of the Local Plan. At present, the trajectory shows delivery starting in 2026/27, just one year after the assumed adoption of the Plan. Even in a best case scenario this is considered extremely unlikely with it being far more likely that the actual delivery of homes will commence three years from the adoption of the Plan in 2028/29. This would reduce overall delivery from the site by 260 dwellings (whether the plan period runs to 31st March 2036 or 2040).
- We have identified that the windfall allowance as included in the trajectory in EX007 should be reduced by 270 dwellings.

In addition, the issue of nutrient neutrality, and the significant impact that this might have on the trajectory needs to be taken into account.

With regard to the 5YHLS as at 1st April 2023, our analysis above suggests that the 5-year supply should be reduced as follows:

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	Projected 5-Year Supply (EX007)	Savills Assessment	Projected 5-Year Supply (Savills)
Existing Local Plan allocations and planning permissions (shaded grey)	853	-210	643
Emerging Local Plan allocations (shaded red)	1,112	-1,112	0
Small sites (shaded pink)	590	No change	590
Windfall allowance (shaded orange)	540	-270	270
Total	3,095	-1,592	1,503

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