



Housing Supply Topic Paper

Local Plan for the Broads.

April 2018

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1. Introduction

- 1.1. The Planning Inspector requested a Housing Supply Topic Paper as part of the Examination of the Local Plan for the Broads to include:
- Tables which identify estimated annual phasing rates for each outstanding permission and proposed allocation site. Brief commentary in the phasing tables on delivery progress/planning applications for each of the sites would be useful. *See chapters 2 and 3.*
 - Commentary regarding the inclusion/non-inclusion of windfall rates, and evidence regarding historical windfall completions. *See chapter 4.*
 - An updated housing trajectory graph which reflects the identified annual phasing rates and includes all relevant sources of supply including outstanding permissions. The trajectory should show a totals column for each monitoring year, which is broken down into constituent supply sources by differential colouring/shading, and should be linked to a summary table which set out the sources, breakdown and annual totals. It should also show the annual target rate and cumulative target rate. *See chapter 5 and 6.*
 - Information on five year supply in the Broads Authority area. *See Chapter 7 and Appendix B.*
- 1.2. The Authority has contacted landowners to confirm the anticipated delivery timeframes if their allocation in the Local Plan was adopted. Please note that for the Utilities Site, Norwich City Council, as the lead Local Planning Authority, were contacted regarding progress on the site. Following these conversations which happened in the last three weeks, the delivery timeframe included within the Local Plan will need to be changed for some allocations; the anticipated delivery timeline is given in this Topic Paper.
- 1.3. The housing and residential moorings trajectories have also been updated to reflect the updated information. The five year land supply for the entire Broads Authority is included at Appendix B and takes into consideration the updated data.

2. Detail of potential delivery timeframes for residential moorings and dwellings allocated in the Local Plan

Policy number	Details	Local Plan anticipated delivery	Further clarification / updates	Anticipated delivery timeframe.
Allocations in the draft Local Plan				
PUBBEC2	Up to 5 residential moorings at Hipperson's Boatyard.	By end of 2020	The landowner has indicated that they would implement the first two moorings in 2025, followed by 1 per year in 2027, 2029 and 2031.	From 2025.
PUBBRU6	Up to 5 residential moorings at Brundall Gardens.	By end of 2020	The landowner has indicated that the plans for the wider site mean they may apply for permission later in the plan period.	From 2030.
PUBCHE1	Up to 5 residential moorings at Greenway Marine, Chedgrave.	By end of 2020	The moorings are already in place, but may need some improvements. So once receive permission, they are ready to be used. Would apply for permission immediately.	By end of 2020
PUBHOV3	Brownfield land off Station Road, Hoveton. Assume minimum of 6 dwellings.	By end of 2019	Late 2017 pre-application advice was sought for the Waterside Rooms part of the wider site. This indicated at least 6 dwellings could be delivered on this part of the site. However despite numerous attempts to follow up with the landowner, no response has been received. It was this initial pre-application request that inferred delivery could be forthcoming in the next couple of years. Given the lack of progress by the landowner and the potential for CPO by North Norfolk District Council, a revised timeframe is proposed.	By end of 2023
PUBL0D1	Up to ten residential moorings at Loddon Marina.	By end of 2020	Landowner confirmed this is their intention.	By end of 2020
PUBNOR1	120 dwellings at Utilities Site, Norwich.	Between 2021 and 2025	No set time line for delivery is confirmed at this stage. The landowner is still keen on the site being developed and so are both Norwich City Council, who is effectively the lead Local Planning Authority on the wider scheme of which the Utilities site is part of, and the Broads Authority. The site is brownfield land in central Norwich on the urban/rural fringe with access to many local services and facilities. That	Considering the willingness of the landowners and local planning authorities to bring this brownfield land on the urban/rural fringe of Norwich forward for development it seems prudent to continue its allocation within the Local Plan (and

Policy number	Details	Local Plan anticipated delivery	Further clarification / updates	Anticipated delivery timeframe.
			being said there are some issues to address in order to bring the site forward. Norwich City Council, with the support of the Broads Authority, submitted a bid to recent Government funding ¹ to bring sites forward for development, but were unsuccessful. The allocation was found sound in 2014 and is rolled forward in this Local Plan with minimal changes to the policy. Fundamentally, this site is part of a wider brownfield site in Norwich which is allocated and will continue to be allocated in future local plans. The withdrawn application for the entire site that was to be dealt with in a joint manner with Norwich City Council, saw an energy station, student accommodation and residential accommodation. According to the plans for the application, all the market and affordable housing were to be located in the Broads part of the site – so our part of the site is fundamental to the successful development of the wider site.	indeed the rest of the site in the Greater Norwich Local Plan) to give a positive stance on appropriate redevelopment of the site. The part of the wider site located within the Broads Executive area is fundamental to the successful development of this area of brownfield land. It is therefore assumed that the site will come forward later in the plan period, post 2030.
PUBOUL2	76 dwellings at the former Pegasus Site, Oulton Broad.	By end of 2020	Further information provided from the developer shows that they are hoping to commence construction of the units in approximately 3 months' time. Year 20/21 10 units Year 21/22 30 units Year 22/23 30 units Year 23/24 6 units.	By end of 2024
PUBSTO1	Up to 4 dwellings at Stokesby.	By end of 2019	Landowner confirmed this it is their intention to seek permission soon after allocation, but delivery more likely by end of 2021.	By end of 2021
PUBTHU1	16 dwellings at Hedera	By end of 2019	Planning permission was granted with condition by	Whilst planning permission has been

¹ Housing Infrastructure Fund: <https://www.gov.uk/government/news/866-million-investment-to-help-unlock-potential-200000-new-homes>

Policy number	Details	Local Plan anticipated delivery	Further clarification / updates	Anticipated delivery timeframe.
	House, Thurne		<p>Committee, decision issued on 13th September 2017. The permission included 25 conditions, a copy of the conditions was sent to the applicant's agent prior to the Committee meeting, no issue was raised at this time. The applicants submitted an application to remove 10 conditions and vary 3 others, citing these as the reason for the lack of serious interest in purchasing the site</p> <p>In considering the application to remove 10 conditions and vary 3 others, officer recommendation was to remove 1 condition relating to obscured glazing, and to remove 1 condition relating to grass cutting and move that to the informative section. Planning Committee members opted to remove the 1 condition relating to grass cutting and move that to the informative section, but to restate the remaining conditions as per the original decision. There has been no word on an appeal as yet although they do have until 7th September to lodge one.</p>	granted, there is uncertainty regarding delivery and as such it seems prudent to presume delivery later in the plan period. The site is currently up for sale. Presume delivered from 2022.
Proposed Changes to the Local Plan – additional sites				
HOR8	Up to 6 residential moorings in Horning.	From 2024	Site proposed through pre-submission consultation and landowner confirmed delivery timeframe. Timeframe also reflects potential future capacity improvements to the Knackers Wood Water Recycling Centre.	From 2024
SOM1	Up to 10 residential moorings in Somerleyton Marina.	By end of 2023	Site proposed through pre-submission consultation and landowner confirmed delivery timeframe.	By end of 2023

3. Detail of potential delivery timeframes for outstanding planning permissions for residential dwellings (including holiday homes).

3.1. Please note that this table includes the allocations at Thurne and Pegasus which are allocated in the Local Plan; these two sites are included in this table and the allocations table but will not be double counted. The holiday accommodation in this table counts towards OAN (as the SHMA assessed empty homes such as holiday homes). These are not sheds, caravans or camping pitches and they have a kitchen and bathroom so are self-contained. See section 8.46 of the 2017 SHMA (EB5).

Application Number	Date	District/County	Parish	Net Market Dwellings	Net Holiday Units	Net resi moorings	Notes	Likely delivery time frames
BA/2017/0383/FUL	20/12/2017	Broadland	Horstead	0	1	0	Not started but pre-commencement conditions recently discharged end of April 2018. Intend to start imminently.	Presume by end of 2019/20
BA/2017/0191/FUL	24/08/2017	Broadland	Postwick	0	1	0	Not started	Intend to discharge conditions and commence 2019/20
BA/2017/0103/OUT	13/09/2017	Great Yarmouth	Thurne	6	0	0	Permitted September 2017. Applied to vary conditions unsuccessfully in March 2018.	As scheme has outline permission, they need to apply for reserved matters within three years of permission and then commence within two years of that permission. Therefore presume delivery of 8 in 2022/23 and 2023/24
BA/2017/0103/OUT	13/09/2017	Great Yarmouth	Thurne	0	10	0	Permitted September 2017. Applied to vary conditions unsuccessfully in March 2018. *This development replaces small and run down units with substantial house-like units. These ten units are therefore considered as net new and count towards the OAN	As scheme has outline permission, they need to apply for reserved matters within three years of permission and then commence within two years of that permission. Therefore presume delivery of 8 in 2022/23 and 2023/24
BA/2017/0311/FUL	26/10/2017	Great Yarmouth	Ormesby ST Michael	0	1	0	-	Presume within the three years as per conditions so by 2020.
BA/2016/0444/FUL	06/03/2017	Great Yarmouth	Ormesby ST Michael	1	0	0	-	Presume within the three years as per conditions so by 2020.
BA/2008/0172	26/06/2008	Great Yarmouth	Stokesby	2	0	0	24/02/2009 started	Presume delivered within three years. By 2021.
BA/2005/1567/HISTAP BA/2013/0242/COND BA/2015/0256/COND BA/2017/0498/COND	26/02/2018	North Norfolk	Hoveton	8	0	0	Final permission is for 8 market dwellings. Commenced in 2005.	Site is on the market, no buyer, unable to predict when but keen to develop them.
BA/2017/0457/FUL	09/02/2018	North Norfolk	Ludham	0	1	0	Not started.	Proceeding with building regulations then to tender end of May start on site September. Intend to be completed this financial year.
BA/2017/0474/FUL	12/03/2018	South Norfolk	Chedgrave	2	0	0	Not started.	Agent expects commencement 2018/19.
BA/2015/0246/FUL	01/11/2015	South Norfolk	Claxton	2	0	0	Discharged pre-commencement conditions May 2016.	Presume 2019/20
BA/2017/0208/FUL	18/08/2017	South Norfolk	Surlingham	0	1	0	Not started.	Applicant unsure of exact time line. Presume commence within three years so presume 2020/21
BA/2015/0426/FUL	01/07/2016	Waveney	Mettingham	4	0	0	Have started site works.	Presume by end of 2019/20
BA/2012/0271/FUL; BA/2016/0151/COND; BA/2017/0037/NONMAT		Waveney	Oulton Broad	76	0	0	This is an allocation in the Local Plan but counted in the permissions data.	Pre-commencement conditions discharged, started on site. Delivery propsoed as follows: 2020/21: 10. 2021/22: 30. 2022/23: 30. 2023:24: 6
BA/2013/0381/CU BA/2012/0382/LBC	18/03/2013	Waveney	Oulton Broad	1	0	0	Started 26/5/15	Owner sold the site on. Preume delivery by 2021.
BA/2017/0151/FUL	03/07/2017	Waveney	Oulton Broad	1	0	0	Not started.	Agent indicated that the owner is looking into delivery of the scheme. Presume by 2020 in line with conditions.

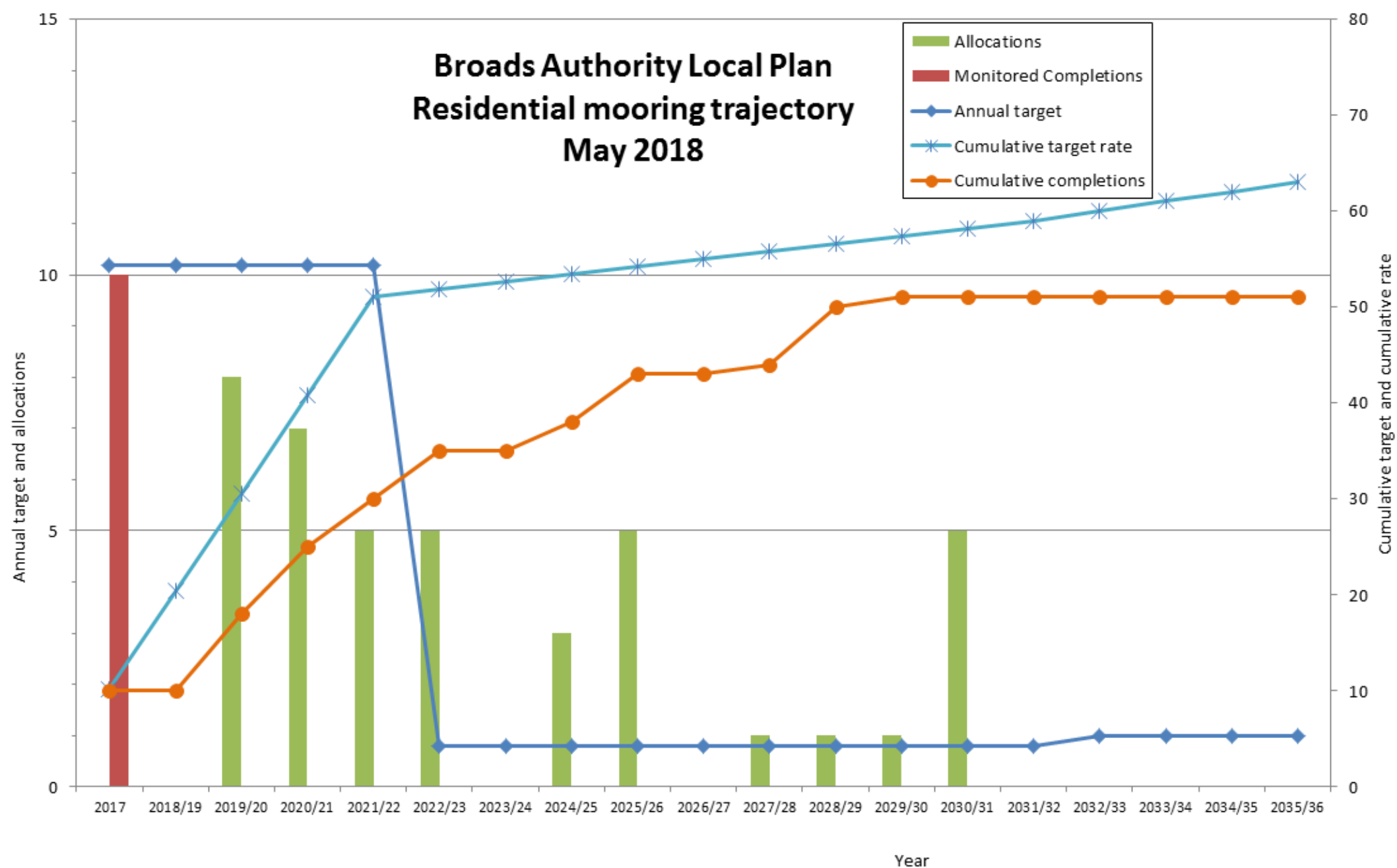
4. Windfall

4.1. Please note that windfall has been removed from both the amended residential moorings and residential dwellings trajectories. On reflection, the delivery of net new dwellings or residential moorings is erratic and a windfall allowance cannot be justified. The following table shows the windfall from each year from 2014/15. Prior to 2014/15 monitoring period, the Authority did not monitor completions.

2014/15	2015/16	2016/17	2017/18
6	3	2	11

5. Residential moorings trajectory and supporting table

5.1. The following residential moorings trajectory reflects the residential moorings policy delivery timelines in the previous section. It is proposed that this replaces the trajectory in the Local Plan. This does include the sites at Somerleyton and Horning that were submitted through the pre-submission consultation. The trajectory starts in 2017 as document EB11 calculated the need for residential moorings from 2017 to 2036. The annual target also reflects that set out in EB11 (see page 103).



5.2. The following table provides the detail for the allocation part of the trajectory (indicated in green in the graph above). Please note that this table includes allocations at Horning and Somerleyton which are proposed changes to the submitted Local Plan.

Site	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
PUBBEC2								2		1	1	1							5
PUBBRU6													5						5
PUBCHE1		3	2																5
PUBL0D1		5	5																10
HOR8							3	3											6
SOM1				5	5														10
Total		8	7	5	5		3	5		1	1	1	5						41

6. Residential dwellings trajectory and supporting table

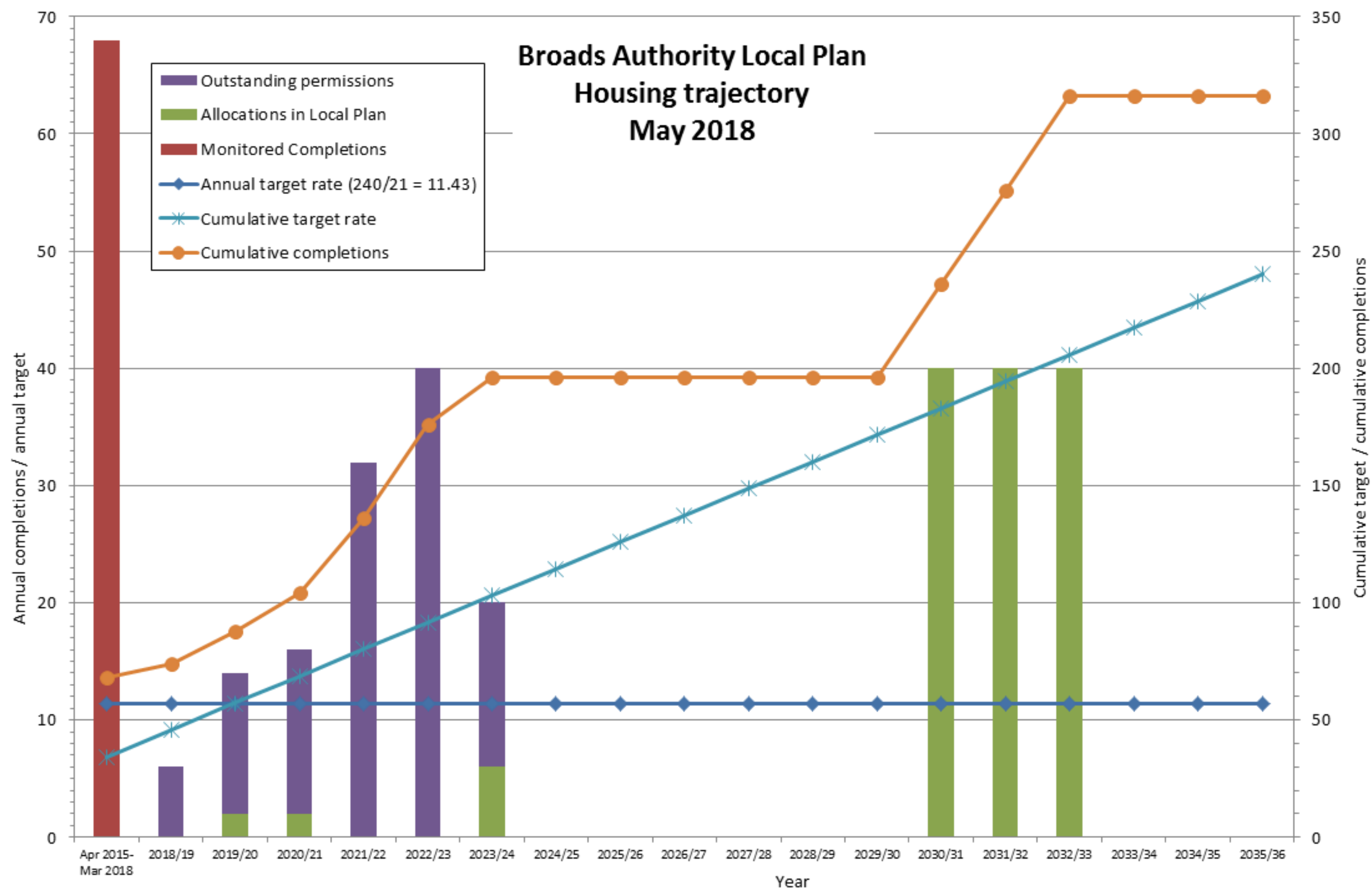
6.1. The following housing trajectory reflects the housing policy delivery timelines in the previous sections. It is proposed that this replaces the trajectory in the Local Plan. Please note that OUL2 and THU1 are included as permissions within this trajectory, as they have planning permission. The Central Norfolk SHMA identified housing need from 2015 to 2036 and that is why the trajectory starts at 2015.

6.2. The following table shows the delivery of the sites allocated in the Local Plan (indicated in green in the graph on the next page). The allocations at Oulton Broad and Thurne are not included in this table; as they have planning permission they are included in the permissions table below.

Site	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
PUBHOV3						6													6
PUBNOR1													40	40	40				120
PUBSTO1		2	2																4
Total		2	2			6							40	40	40				130

6.3. The following table shows the delivery of the sites with extant planning permission (indicated in purple in the graph on the next page). Please note that this table includes the allocations at Thurne and Pegasus which have planning permission.

Site	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	Total
PUBOUL2 BA/2012/0271/FUL BA/2016/0151/COND BA/2017/0037/NONMAT			10	30	30	6													76
PUBTHU1 BA/2017/0103/OUT					8	8													16
BA/2017/0383/FUL		1																	1
BA/2015/0426/FUL	2	2																	4
BA/2005/1567/HISTAP BA/2013/0242/COND BA/2015/0256/COND BA/2017/0498/COND		2	2	2	2														8
BA/2013/0381/CU BA/2012/0382/LBC			1																1
BA/2015/0246/FUL		2																	2
BA/2017/0151/FUL		1																	1
BA/2017/0191/FUL		1																	1
BA/2017/0208/FUL			1																1
BA/2017/0457/FUL	1																		1
BA/2017/0474/FUL	2																		2
BA/2017/0311/FUL		1																	1
BA/2016/0444/FUL		1																	1
BA/2008/0172	1	1																	2
Total	6	12	14	32	40	14	0	0	0	0	0	0	0	0	0	0	0	0	118



7. Five Year Land supply

7.1. Five year land supply on adoption.

7.1.1. As shown in Appendix A, the Broads Authority will have a five year land supply on adoption of the Local Plan. Please see the following summary table.

Area	Liverpool	Sedgefield
Broads Authority Executive Area	11.41 years	16.17 years

7.2. Rolling five year land supply.

7.2.1. The Broads Authority will not have a rolling five year land supply over the entire plan period because of the stepped profile, as a result of relatively small numbers which are sensitive to particular individual sites, as can be seen in the housing trajectory and in the following table:

0-5 years after adoption	5-10 years after adoption	10-15 years after adoption	15 to 16 years after adoption
102 dwellings	0 dwellings	120 dwellings	0 dwellings

7.2.2. The following table estimates five year land supply for each year of the plan period, from adoption. This presumes the dwellings will be completed in line with the trajectory with no windfall assumption included. The figures in red show where there is no five year land supply.

Year	Liverpool approach	Sedgefield approach	Commentary
2019/20	11.41	16.17	
2020/21	10.72	18.52	
2021/22	9.41	17.30	
2022/23	7.37	49.85	
2023/24	3.54	Not relevant	For Sedgefield (at -4.43 years), the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2024/25	0.00	Not relevant	For Sedgefield (at 0 years), the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2025/26	0.00	Not relevant	For Sedgefield (at 0 years), the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2026/27	7.73	Not relevant	For Sedgefield (at -24.21 years), the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2027/28	14.07	126.28	
2028/29	18.97	41.10	
2029/30	16.79	23.05	
2030/31	14.56	16.02	

Year	Liverpool approach	Sedgefield approach	Commentary
2031/32	45.01	45.01	
2032/33	Not relevant	Not relevant	For both Liverpool approach (-5.05 years) and Sedgefield approach (-10.16 years) the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2033/34	Not relevant	Not relevant	For both Liverpool approach (0 years) and Sedgefield approach (0 years) the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2034/35	Not relevant	Not relevant	For both Liverpool approach (0 years) and Sedgefield approach (0 years) the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.
2035/36	Not relevant	Not relevant	For both Liverpool approach (0 years) and Sedgefield approach (0 years) the total five year requirement over the coming five years is a negative figure indicating that housing need over that period has been met.

7.3. Commentary

7.3.1. This situation reflects that two larger sites (Pegasus at 76 dwellings and Utilities sites at 120 dwellings) amount to 196 of the 286 dwellings (240 if the Great Yarmouth Borough Council duty to cooperate agreement is considered). The Pegasus site has planning permission and delivery has commenced and is set to be completed within the first five years of adoption of the Local Plan, whereas the Utilities Site is set to be delivered later in the plan period.

7.3.2. Taking into account a similar situation in the Yorkshire Dales National Park where their trajectory showed that the five year land supply will not be maintained for the entire plan period, the Inspector recommended that the National Park Authority committed to a review of the land supply policy within five years of adoption. As stated in the Local Plan for the Broads (Page 208, section 33.4) the Authority is committed to start to review the policies of the Local Plan after around 18 months of adoption. Indeed the Government has recently set out requirements to review Local Plans within 5 years of their production. Furthermore, with a new version of the NPPF set to be published in July 2018, a review of the Local Plan soon after its publishing seems prudent anyway.

7.3.3. Fundamentally, the housing need for the Broads is met and exceeded as a result of allocations in the Local Plan.

7.3.4. It seems that the Five Year Land Supply approach was produced mainly for district councils and did not have specific areas such as the Broads Authority in mind. Given the overall context that a lack of a five year land supply would in the presumption in favour of sustainable development in the NPPF, this would contradict the protected status of the Broads. Indeed the National Parks England response to the NPPF consultation seeks an exemption from the five year land supply requirement to National Parks and the Broads.

7.3.5. The Authority considers that the stepped housing trajectory is appropriate and shows that over the years the housing target is met at the end of the period, even if the rolling five year land supply requirement might not be met for specific years during that period.

8. Delivery surplus

8.1. Taking into account the permissions, completions and allocations, Appendix A sets out the oversupply of residential dwellings over the period to 2036 as at April 2018. To summarise:

- a) In Central Norfolk HMA area: 23.92% over provision.
- b) In Waveney HMA area: 50.9% over provision
- c) Across the Broads Authority Executive Area: 31.7% over provision.

8.2. In the Great Yarmouth HMA area there is a Duty to Cooperate agreement in place that effectively covers 46 dwellings. As well as 20 dwellings allocated in the Local Plan, 4 were completed and 4 permitted between April 2015 and March 2018. This indicates an over provision against the 20 dwellings housing target of 40%.

9. Proposed amendments to the Local Plan

It is requested that the following amendments are made to the Local Plan:

- i. Replace the housing trajectory with the amended trajectory within this paper.
- ii. Replace the residential moorings trajectory with the amended trajectory within this paper.
- iii. Amend the timeframe for delivery of each allocation to reflect that stated within this paper.

Appendix A: Completions, permissions and how residual need is met

	Net completions since April 2015 (as at April 2018)					Permitted not completed (as at April 2018)					OAN in HMA*^	Total completions and permissions	OAN less completions and permissions in HMA	Outstanding allocations (2014 SS) not yet completed/permited~	Draft allocations in emerging Local Plan\$	Yet to find... (residual)#
	Market	Affordable	Second Home	Holiday Home	Total	Market	Affordable	Second Home	Holiday Home	Total						
Broadland	1	0	0	4	5	0	0	0	2	2	163	76	87	-		39
North Norfolk	1	0	0	0	1	8	0	0	1	9				-	Waterside Rooms, Hoveton - assume 6	
Norwich	0	0	0	0	0	0	0	0	0	0				Utilities site - assume 120	[Utilities Site]	
South Norfolk	52	0	0	2	54	4	0	0	1	5				-		
Great Yarmouth	3	0	0	1	4	9	0	0	11	20	20	24	-4	[Hedera House counted in the permissions section]	[Hedera House counted in the permissions section] Stokesby - assume 4	8
Waveney	3	0	0	1	4	82	0	0	0	82	57	86	-29	[Pegasus counted in the permissions section]	[Pegasus counted in the permissions section]	29
	60	0	0	8	68	103	0	0	15	118	240	186	54			76

Note that the plan period is to 2036. This table reflects the situation as at April 2018.

Note that Broadland DC do not monitor completions on the Broads part of their district. The BA started monitoring this in 2015.

* as calculated in Central Norfolk SHMA 2017

~ as allocated in the Broads Authority Sites Specifics Local Plan 2014

positive means over provision and negative means residual need

\$ Brackets show site rolled forward from 2014 Sites Specifics Local Plan. Stokesby and Waterside Room are additional sites allocated.

^The OAN for Great Yarmouth Borough Council part of the Broads is 66 dwellings. There is a Duty to Cooperate Agreement with the Borough which states that they will meet the entire need of the Broads. Twenty dwellings are allocated in the Local Plan so effectively the OAN/target used in the table is 20 dwellings.

Appendix B: Five Year land supply to reflect adoption at end of 2018/19 financial year

See Five Year Land Supply Statement on website (EPS7).