



25 March 2024

Mr David Reed  
Planning Inspector  
c/o Mrs Annette Feeney  
North Norfolk Local Plan Examination Programme Officer  
Sent via email

Dear Mr Reed,

### **NORTH NORFOLK LOCAL PLAN EXAMINATION: REVISED HOUSING TRAJECTORY**

I refer to your request made during the examination hearing session for Matter 7 on Thursday 7<sup>th</sup> March:

*'Q2. Please re-submit a revised Housing Trajectory to reflect any conceded sites which are not deliverable within five years (or in the plan period at all) in the light of the discussion, to remove any double counting of dwelling numbers when allocations have planning permission and to include any revised windfall assumptions the Council think are appropriate.'*

*'There is no need to revise the trajectory for small growth villages in the light of nutrient neutrality because the trajectory is already extended across the plan period.'*

This document, including Appendices, updates the evidence relating to the delivery of development over the next five years solely in relation to any sources of housing supply which have been contested through the Local Plan examination hearings, and in order to reflect the discussions held during those hearings.

The updated spreadsheet (see **Appendix A** - Updated version of Five-Year Land Supply Delivery Table) includes those sources of supply included in the published Five-Year Land Supply Statement 2023-2028 [EX007] but now shows up to date delivery expectations for each source of supply for the period **2024-2029**. **Appendix B** presents this information as a trajectory graph, for visual representation of how housing delivery is anticipated to take place across the period 2016-2040, when factoring in these adjustments.

We have not updated the spreadsheet to include new permissions granted since 1 April 2023, or recorded completions during the year 2023-2024, as this data will not be available until shortly after year end on 31 March 2024 (we note that the Inspector has requested that we provide this information as soon as possible following year end). For those sources of supply where delivery was not challenged during the Hearings, we have not altered the trajectory as provided in the Council's original response [EX007].

The changes made in relation to the contested sources of housing supply are summarised in the following sections:

## 1. Contested Sites

Contested Site Reference	Change in delivery expectations compared to EX07 Five Year Land Supply Statement 2023-2028
<b>COR01</b> Land Between Norwich Road and Adams Lane, Corpusty	Expected commencement and completion remains as per Five Year Land Supply Statement.
<b>F01</b> Land North of Rudham Stile Lane (east of Water Moor Lane), Fakenham	Moved expected delivery back by one year to align with Trinity expectations and ability to address nutrient neutrality requirements for initial phases on site.
<b>ROU3</b> Land at Back Lane, Roughton	No change in delivery expectations.
<b>PF/17/0729</b> Land at Former RAF Base, West Raynham	Moved expected delivery back by one year reflecting ability to address nutrient neutrality on site for most of the proposed development.
<b>BRI01</b> <b>BRI02</b> Land East & West of Astley Primary School, Briston	No change in delivery expectations reflecting ability to address Nutrient neutrality requirements on land controlled by promoter.
<b>F10</b> Land South of Barons Close, Fakenham	Pushed commencement back two years to reflect Nutrient Neutrality requirements and ability to address on-site.
<b>F03</b> Land at Junction of A148 and B1146, Fakenham	Pushed commencement back two years to reflect Nutrient Neutrality requirements and likely availability of credits in Wensum catchment during 2024.
<b>F02</b> Land Adjacent to Petrol Filling Station, Wells Road, Fakenham	Pushed commencement back two years to reflect Nutrient Neutrality requirements and likely availability of credits in Wensum catchment during 2024.
<b>HOV01/B</b> Land East of Tunstead Road, Hoveton	Pushed commencement back two years to reflect nutrient neutrality requirements.
<b>ST19/A</b> Land Adjacent Ingham Road, Stalham	Removed from five-year period reflecting lack of known developer interest
<b>ST23/2</b> Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Increased site yield to 101 units to reflect planning application
<b>H20</b> Land at Heath Farm, Holt	No adjustment made. Developers accepted trajectory.
<b>NW01/B</b> Land at Norwich Road & Nursery Drive, North Walsham	Pushed delivery back one year to 2026/27 although earlier start appears more likely.

<b>NW62 – North Walsham West SUE</b>	Pushed delivery back one year to 2027/28 to match consortium expectations.
<b>HOR6</b> Land East of Abbott Road, Horning	Removed from trajectory entirely due to drainage constraints.
<b>PF/19/0989</b> Land East of Stiffkey Road, Warham	No change made as development has commenced on site.

## 2. Treatment of Windfalls

At the Hearings there was a discussion about the Authorities approach to windfall development and in particular the relationship between ‘future windfall allowances’ and the ‘Small Sites with planning permission’ source and what approach should be taken to avoid the potential for double counting dwellings which might be accounted for in both sources. In this regard the Authority argued that a 50% discount on historic delivery rates as applied in the Five-Year Land Supply Statement coupled with a 100% discount in year one of the five-year period was more than sufficient to address any concern and further reductions were not justified. This approach has been retained in the revised trajectory for the five-year period 2024-2029.

However, we consider a strong case can be made for the 50% discounted rate being excessive and a smaller reduction being applied for the remainder of the Plan period. The 50% figure is not based on any evidence of diminishing supply, on the contrary we consider that the Plan will provide increased opportunities for this source of development. The 50% discount is simply applied to avoid the suggestion that the Plan risks being over reliant on this source of homes. The updated trajectory applies a 33% discount on historic windfall delivery rates over the Plan period but retains the 100% discount in year one and applies a 50% discount rate in years two, three, four and five.

## 3. Small Growth Village Allowance

We have removed all delivery in the next five years from those villages impacted by Nutrient Neutrality requirements. We have apportioned the allowance in Policy SS1 for the Selected Small Growth Villages over the remaining Plan period to 2040.

Yours sincerely

**Mark Ashwell**

Planning Policy Manager

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Enclosures:

Appendix A - Updated version of Five-Year Land Supply Delivery Table

Appendix B - Updated Housing Trajectory graph for period 2016-2040

The table below provides details of all those sites where the Council considers there is a realistic prospect of development being delivered in the next five years. It includes the three main sources of supply identified in the land supply statement, namely, large sites which are either allocated or have planning permission for development, sites of less than 10 dwellings which already have planning permission and an allowance for windfall developments. The site reference numbers are either those given to the site in the North Norfolk Site Allocations Plan or are the planning application reference. Both the Allocations Plan and details of each planning application, including location plans, are available on the Council's web site. Many of the sites included within this schedule are already under construction and some of the approved dwellings have been completed. Precise delivery rates of development will vary year on year and will be kept under review via production of annual statements of land supply.

Schedule of Sites & Projected Delivery Rates																																	
Site reference	Parish	Location	New Local Plan Allocations	Planning Status					Build Info					Trajectory 2024-29						Trajectory from 2029-40													
				Adopted Plan Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2023	Left to be built (inc under construction)	Total dwellings in 5yr supply	2016/17	2017/18	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	2036/37	2037/38
ALD01 PF/19/1154	Aldborough	Garage site / Pipits Meadow Aldborough		8				2	1	7	0						1																
BACT03	Bacton	Land adjacent to Beach Road, Bacton		20						20	0																						
PF/88/1996 PF/17/1265	Briston	Land at Hall Street, Briston						64	60	4	0						4																
BRI24 PF/15/1746 PF/19/1648	Briston	Land at rear of Holly House, Briston		10				9		9	9							2	2	4	1												
CAT01	Catfield	Land off Lea Road, Catfield		15	15					15	0																						
COR01 PF/21/1990	Corpusty	Land between Norwich Road & Adams Lane, Corpusty		18	18			38		38	38									18	20												
09/0826	Cromer	Burnt Hills, Cromer						13		13	13							3	3	3	3	1											
19941720 19961424 19960965 19960292 19951110	Cromer	Central Road, Cromer						99	46	31	0																						
22.002 19741952 PF/17/0626	Cromer	Cromwell Road, Cromer						20	13	7	5						2	1	1	2	1												
19901666 NMA/22/1470	Cromer	Highview, Cromer						20		20	10					10	10																
C01	Cromer	Land adjacent to East Coast Motors, Beach Road, Cromer		40						40	0																						
C04 PO/15/0572 PM/17/0751 PO/18/1779 RV/23/1131	Cromer	Land at rear of Sutherland House, Overstrand Road, Cromer		60	68		68		14	54	32					22	10	22															
C07 PF/13/0451 PF/14/0863	Cromer	The Embankment, Jubilee Lane, Cromer						10	9		0																						
C07 PO/19/0281 Withdrawn	Cromer	Land at Jubilee Lane / Cromer High Station, Cromer		40							0																						
ROS3	Cromer	Land between Loudon Rd & Church Street, Cromer		15							0																						
ROS4	Cromer	Land South of Loudon Rd, Cromer		20						20	0																						
C14 13/0247	Cromer	Land West of Roughton Road, Cromer		160				145	145		0																						
ED2	Cromer	Cromer Football Club Mill Rd. Cromer		10							0																						
F01 PO/17/0680	Fakenham	Land North of Rudham Stile Lane, Fakenham. Remaining Allocation. Fakenham		768			950			950	40										10	30	80	80	100	100	100	100	100	100	100	100	50
F01 (Picken) PO/14/1212 PM/17/1183	Fakenham	Land North of Rudham Stile Lane, Fakenham						78	78		0																						
F01 (Places for People) PF/15/1167	Fakenham	Land North of Rudham Stile Lane, Fakenham Trinity Road						101	101		0																						
HAP07	Happisburgh	Land West of Whimpwell Street, Happisburgh		14						14	0																						
PF/20/1345	Hindringham	Land South Of Wells Road, Hindringham						11			11						11																
PM/16/1512 PM/15/1578 PM16/1511	Holt	Land South of Cromer Road and North/East of Grove Lane, Holt						150	150		0																						

Site reference	Parish	Location	New Local Plan Allocations	Planning Status					Build Info					Trajectory 2024-29							Trajectory from 2029-40																		
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H01 PM/15/0804	Holt	Land West of Woodfield Road, Holt		100			83		83	83								15	30	38																			
H09 PM/16/1204	Holt	Land at Heath Farm / Hempstead Road, Holt		200			215	212	212	0																													
H09 PM/20/2643	Holt	Land To East Of Nightjar Road, Holt					36	36		0																													
PF/20/2047	Holt	Land To The North Of Hempstead Road, Holt					36			36							36																						
PO/18/1857 PM/22/2985	Holt	Land Off Beresford Road, Holt					110			110	108						30	40	38																				
H12 PF/17/1803	Holt	Land off Hempstead Road, Holt		70			52	20	32	0						32																							
HOR06 PO/11/1505 - Pending	Horning	Land East of Abbot Road, Horning		26		26				26	0																												
PF/17/1802	Hoveton	Residential Development. Church Field, Hoveton					25	25		0																													
PO/15/0539 PM/20/1641 - Pending	Hoveton	Land to the north of Tilia Business Park, Tunstead Road, Hoveton					28			28	28							14	14																				
SN01 PO/14/1249 PM/18/0334	Little Snoring	Land at junction of Holt Road & Kettlestone Road, Little Snoring		20			20	20	20	2	0																												
SN05	Little Snoring	Land adjacent to Little Snoring Primary School, Kettlestone Road, Little Snoring		10						10	0																												
LUD01 PF/19/0991	Ludham	Land South of School Road, Ludham		15			12			12	12							12																					
LUD06	Ludham	Land at Eastern end of Grange Close, Ludham		10						10	0																												
NW28a	North Walsham	North Walsham Football Club, North Walsham		60						60	0																												
OVS03 PF/18/0179	Overstrand	Land at rear of 36 Bracken Avenue, Overstrand		6			4	4		0																													
PF/20/1781	Northrepps	Land North Of Broadgate Close, Northrepps					19			19							9	10																					
PM/14/0854 75.001	Overstrand	Hillingdon Park, Overstrand					10	4	6	4						2	4																						
ROU03/10 PO/14/0986 PF/19/1028 - Pending (Replacing Application RM/19/0359)	Roughton	Land at Back Lane, Roughton		30			30			30	30							15	15																				
PM/10/0295 PF/18/2053 PF/19/0191	West Runton	39 - 52 Renwick Park, West Runton					10	3	7	5						1	1	1	1	1	1	1	1																
SH04	Sheringham	Land adjoining Seaview Crescent, Sheringham		45						45	0																												
SH06 PM/16/1725 PM/18/1502 PF/22/1928 - Pending	Sheringham	Land rear of Sheringham House, Sheringham		70			62			62	62							30	30	2																			
SH14 15/0114	Sheringham	Land at Holway Road, opposite Hazel Avenue, Sheringham		50			52	34	18	0						18																							
PF/14/0644	Sheringham	Land at Seaview Crescent, Sheringham					11	6	5	3						2	3																						
PF/77/0968	Sheringham	The Esplanade, Sheringham					55	24	31	0																													
PF/20/2483	Sheringham	St Nicholas Nursing Home, Sheringham					13			0																													
PF/21/3141	Sheringham	Land South Of Weybourne Road, Sheringham					39			39							39																						
PF/21/3141	Sheringham	Land South Of Weybourne Road, Sheringham					24			24								24																					
PF/17/1524	Stalham	Slaughter House, Upper Staithe Road, Stalham					42	42		0																													
SOU02 PF/19/0771	Southrepps	Land West of Long Lane, Southrepps		10			15	15		0																													
SOU07	Southrepps	Land North of Thorpe Road, Southrepps		12						12	0																												
PF/20/1582	Walcott	Land off Ostend Road, Walcott					18			18	18						2	8	8																				
WAL01	Walsingham	Land East of Wells Road, Walsingham		24						24	0																												

Site reference	Parish	Location	Planning Status						Build Info		Trajectory 2024-29										Trajectory from 2029-40																								
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PF/17/0729 - Pending	West Raynham	RAF West Raynham, Massingham Road, West Raynham				94				94	94									35	35	24																							
PF/19/0989	Warham	Development Land east of Stiffkey Road, Warham						12			12								6	6																									
WEY09	Weybourne	Land South of Beck Close, Weybourne		4						4	0																																		
<b>Emerging Local Plan (Small Growth Villages)</b>				400							82								19	20	22	21	21	58	63	62	60	58	49	0	0	0	0	0	0										
<b>Emerging Local Plan (Site Allocations)</b>																																													
BLA04/A	Blakeney	Land East of Langham Road, Blakeney	Y	30							30								10	20																									
BRI01	Briston	Land East of Astley School, Briston.	Y	25							25									10	15																								
BRI02	Briston	Land West of Astley School, Briston	Y	40							40									10	30																								
C07/2	Cromer	Land at Cromer High Station, Norwich Road	Y	22							0																																		
C16	Cromer	Former Golf Practice Ground, Overstrand Road, Cromer	Y	150							80										30	50																							
C22/2	Cromer	Land West of Pine Tree Farm, Cromer	Y	400							40									10	30			60	18																				
F01/B (Part)	Fakenham	Land North of Rudham Stile Lane, Fakenham	Y	560							0															10	30	50	77	160	100	100	100												
F10	Fakenham	Land South of Barons Close, Fakenham	Y	55							40										10	30	15																						
F03	Fakenham	Land at Junction of A148 and B1146, Fakenham	Y	65							25											25	40																						
F02	Fakenham	Land Adjacent to Petrol Filling Station, Wells Road	Y	70							10											10	30	30																					
H17	Holt	Land North of Valley Lane, Holt	Y	27							27								13	14																									
H20	Holt	Land at Heath Farm, Holt	Y	180							90										30	60	60	60	10																				
HV01/B	Hoveton	Land East of Tunstead Road, Hoveton	Y	120							40											40	50	30	40																				
LUD01/A	Ludham	Land South of School Road, Ludham	Y	20							0																																		
LUD06/A	Ludham	Land at Eastern End of Grange Road	Y	15							0																10	5																	
NW01/B	North Walsham	Land at Norwich Road & Nursery Drive, North Walsham	Y	416							120									40	40	40	73	73	70	40	40																		
NW62	North Walsham	Land West of North Walsham	Y	1800							177										83	94	134	121	141	126	86	110	147	141	114	173	126												
MUN03	Mundesley	Land off Cromer Road & Church Lane, Mundesley	Y	30							30										10	20																							
SH04	Sheringham	Land adjoining Seaview Crescent, Sheringham	Y	45							10											10	10	15	10																				
SH07	Sheringham	Former Allotments, Weybourne Road, Adjacent to The Reef, Sheringham	Y	40							0																																		
SH18/1B	Sheringham	Land South of Butts Lane, Sheringham	Y	48							48								10	30	8																								
ST19/A	Stalham	Land Adjacent Ingham Road, Stalham	Y	70							0												10	30	30																				
ST23/2	Stalham	Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Y	80							101										30	40	31																						
W01/1	Wells-next-the-sea	Land South of Ashburton Close, Wells-next-the-sea	Y	20							20							10	10																										
W07/1	Wells-next-the-sea	Land Adjacent Holkham Road, Wells-next-the-sea	Y	50							50								10	20	20																								
Total from small sites (under 10 dwellings which already have planning permission)											441											150	189	187	61	3	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Windfall											540																	135	135	135	135	180	180	180	180	180	180	180	180	180	180	180	180	180	180
Small Growth Villages											82																		0	19	20	22	21	21	58	63	62	60	58	49	0	0	0	0	0
<b>Totals</b>											2801																		244	358	520	606	662	655	814	778	728	608	551	548	583	581	494	503	406



# Trajectory of Expected Housing Delivery 2016-40

Number of dwellings projected to be completed each year (1 April - 31 March) over period

