APPEAL BY: Quantum Land (Brundall) Ltd against the refusal of Broadland District Council to grant outline planning permission with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C3), and a community/sports pavilion (Class D1 and D2 use), a country park, formal and/or informal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans.

PLANNING INSPECTORATE REFERENCE: APP/K2610/W/19/3239986

LOCAL PLANNING AUTHORITY REFERENCE: 20171386

Proof of Evidence of Paul Harris BSc, MA, PG DIP (Urban Design and Placemaking)

Place Shaping Manager

South Norfolk and Broadland District Councils

August 2020
1.0 Qualifications and experience

1.1 My name is Paul Harris, I am currently employed as the Place Shaping Manager at South Norfolk and Broadland District Councils. I hold a Masters degree in Town Planning and a Post Graduate Diploma in Urban Design and Place Making.

1.2 I have 17 years of experience working in planning in both development management and planning policy roles.

1.3 I have worked at Broadland District Council (‘the Council’) since 2008. I am currently the manager of the Place Shaping Team responsible for Planning Policy, Infrastructure Planning, Neighbourhood Planning and monitoring functions. I have been closely involved in the preparation of the Greater Norwich Area Housing Land Supply Assessment, I am familiar with most of the larger residential development sites in Broadland and have a good working relationship with locally active developers, agents and land promoters.

2.0 Introduction

2.1 This proof provides evidence in relation to the Greater Norwich five year land supply position. I will also outline the steps that the Council has taken to boost the supply of housing in Broadland.

2.2 Other than as it relates to the Council’s position on five year land supply, my evidence does not deal with the adopted policy context or the National Planning Policy Framework. Nor does it deal with detailed matters of landscape. Matters of landscape are addressed by the Council’s Landscape Architect, Mr Robin Taylor. All other planning matters, including the planning balance taking account of the Council’s position on five year land supply, are dealt with by the Council’s lead officer for this appeal, Mr Charles Judson.

2.3 I confirm that the evidence which I have prepared are my true and professional opinions.

2.4 Whilst in its Statement of Case the appellant had sought to contest the robustness of the Council’s Housing Land Supply (HLS) Statement. Subsequently, and having reviewed further information published by the Council, the appellant agreed in a
Statement of Common Ground dated 18 February 2020 that it would “not contest the LPA’s 5 YHLS assumption”. Based on an email from the appellant to the planning inspectorate dated 7 July 2020, I understand that the appellant now wishes to give evidence challenging the Council’s position on five year land supply due to “the effects of the COVID-19 pandemic and change in circumstances in housing delivery”.

2.5 It is currently unclear what particular effects of the COVID-19 pandemic change in circumstances in housing delivery the appellant is referring to. The appellant has confirmed that the substantive areas of disagreement relate to supply-side issues and that a schedule of sites that are in dispute would be set out in their proof of evidence. However, the Council is not currently aware which sites are disputed. Therefore, it has not been possible to focus this proof of evidence on the matters in issue between the parties, and any specific issues raised by the appellant in their proofs of evidence are likely to need to be dealt with through a rebuttal statement.

2.6 It should be noted that the Council has already begun the preparation of an update to the current HLS statement with a basede of 1 April 2020, this will take account of all new commitment approved in the previous year. It is currently expected that an updated statement will be completed and published in October 2020.

3.0 Greater Norwich Five Year Housing Land Supply

3.1 For the purposes of determining planning applications housing land supply is measured across the Greater Norwich area i.e. the combined areas of Broadland, Norwich and South Norfolk Councils excluding the Broads Authority. This measurement of housing land supply across this area reflects the fact that the three authorities operate under a single joint core strategy, which sets out strategic policies for the whole of the Greater Norwich area, and that the three authorities intend to continue to work under a joint local plan in the form of the Greater Norwich Local Plan (GNLP) which is currently at the Regulation 18 stage of the plan making process.

3.2 The Council’s latest published position on five year land supply is set out in the Greater Norwich area Housing Land Supply Assessment 1st April 2019 (‘2019 HLSA’). This is in Appendix A - of the JCS Annual Monitoring Report for 2018-2019 (Core Document 8.22), which was published in February 2020 and formally agreed by the
relevant local authorities thereafter. The 2019 HLSA is included as Appendix A of Core Document CD8.22.

3.3 The 2019 HLSA has been completed in a manner consistent with the requirements of the NPPF and advice contained in Planning Practice Guidance. The assessment clearly sets out how the authorities have determined or dealt with:

a. The starting point for calculating 5-year land supply;

b. Past under delivery of new homes;

c. Sources of Supply;

d. Methodology for Calculating Housing Land Supply; and, the final Calculation of Housing Land Supply.

e. Appendices to the Housing Land Supply Assessment set out:
   i. the housing forecasts for individual sites of 10+ units;
   ii. joint statements between the Council and relevant house builders or sites promoters regarding the delivery of sites; and
   iii. summaries of the windfall and lapse rate/non-implementation assessment.

3.4 To avoid repetition, the full explanation contained in the 2019 HLSA in respect of the matters set out in paragraph 3.2 above is not repeated here. However, key points from the assessment are as follows:

a. The Housing Requirement figure within the JCS became 5 years old on 10 January 2019 and has not been reviewed and found not to need updating, as set out in NPPF Footnote 37. Therefore the standard methodology for the calculation of Local Housing Need (‘LHN’) is the correct starting point for the calculation of five year land supply.

b. The calculation of LHN includes an uplift to take account of any past under-delivery, as part of the affordability adjustment. Therefore, no further adjustment is needed to LHN to address historic under-delivery against the JCS housing requirement.
c. The correct geographical area over which to calculate five year land supply when using LHN as the starting point is the whole of Greater Norwich i.e. the combined areas of Broadland, Norwich and South Norfolk.

d. An assessment of the deliverability of major sites and the evidence supporting assumptions about minor development have been prepared in accordance with the requirements of the NPPF and advice of the Planning Practice Guidance.

e. Greater Norwich has delivered 133% of its requirement under the Housing Delivery Test between 2015/16 and 2017/18\textsuperscript{1}. Therefore, a 5% buffer needs to be added to the supply of deliverable sites when calculating five year land supply.

f. The Greater Norwich authorities, comprising Broadland, Norwich and South Norfolk, have a 5.89-year housing land supply.

3.5 Although the appellant’s case on five year land supply is currently unclear, from the 7 July 2020 email to the Planning Inspectorate the Council does not anticipate that the above aspects of the 2019 HLSA are disputed. Rather, the issues appear to be around changes in circumstances since the 2019 HLSA was published.

4.0 Steps taken to Boost Significantly the Supply of Land for Housing

4.1 Since the basedate of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk, the total housing commitment (sum of planning permissions and allocations) has increased from 14,090 homes at 1 April 2008 (as shown in the housing allocation tables under Policy 4 of the JCS, Policy 4 of the JCS is included as Core Document CD4.3) to 33,270 homes at 1 April 2019 (as shown by the sum of total commitments across Greater Norwich in the 2019 HLSA, Appendix A of Core Document 8.22). This is equivalent to a percentage increase of 136%. This substantial increase in commitment has been delivered against a backdrop of the 18,251 housing completions between 1 April 2008 and 31 March 2019. This shows that the Councils have not just delivered replacement permission for the number of

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\textsuperscript{1} Since the Publication of the 2019 HLSA the results of the Housing Delivery Test for the period 2016/17 to 2018/19 have been published. They were published on 13 February 2020. The latest results demonstrate that Greater Norwich has delivered 140% of its housing requirement over this period. Therefore the position has improved since the publication of the 2019 HLSA.
homes built, an number in excess of the commitment at 2008, but has actually increased the level of commitment substantially whilst this delivery has occurred.

4.2 Within Broadland itself, the total housing commitment has increased from an estimated 3,014 at 1 April 2008 to 16,407 at 1 April 2019 (as shown by the sum of total commitments across Broadland in the 2019 HLSA, Appendix A of Core Document 8.22). This is equivalent to a percentage increase of 444%. Again, this substantial increase in commitment has been delivered against a backdrop of the 4,356 housing completions between 1 April 2008 and 31 March 2019.

4.3 Greater Norwich’s and Broadland’s commitment to boosting significantly the supply of housing is therefore indisputable.

Housing Enabling

4.4 The Council has engaged positively and pragmatically with infrastructure providers, land promoters, agents and developers. This has resulted in:

- development schemes being supported through the Local Infrastructure Fund scheme established as part of the Greater Norwich City Deal, specifically providing developer finance to enable the delivery of residential development sites in at Little Plumstead Hospital and in Horsford;

- land acquisition and site assembly, specifically acquiring the GT8 allocation to ensure the delivery of key transport infrastructure. Key infrastructure needed to release the site for delivery is now planned to be delivered in January 2021 supported by Greater Norwich’s pooled CIL infrastructure investment fund. This investment will also release the GT8 site for development;

- accelerating or front funding the delivery of key green infrastructure in the form of Harrisons Woods and/or Houghen Plantation. The delivery is green infrastructure is necessary to address the impact of increased recreational pressure on internationally protected habitat and wildlife sites;

- forward funding an update of the Rackheath Masterplan, endorsed February 2018, in partnership with the landowner (Manor Farms Rackheath) and developer (Barratt / David Wilson Homes). This established
an up-to-date masterplan and supporting infrastructure assessments that was endorsed by the Council and which can be used to give confidence to the market around what is expected of the development.

4.5 In combination these interventions are helping to advance the housing commitments across the district.

**Local Plan**

4.6 Broadland District Council, Norwich City Council and South Norfolk Council are working with Norfolk County Council to prepare the Greater Norwich Local Plan ('GNLP').

4.7 The Greater Norwich Local Plan builds on the long-established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and jobs needs of the area to 2026 and the GNLP will ensure that these needs continue to be met to 2038.

4.8 Like the JCS, the GNLP will include strategic planning policies to guide future development, and plans to protect the environment. It will look to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area. Unlike the JCS, the GNLP will include allocations of land.

4.9 A Regulation 18 consultation on the GNLP has recently been completed. The partners continue to be committed to meeting the growth needs of the area.

**5.0 Conclusions**

5.1 The 2019 HLSA has been prepared in accordance with the National Planning Policy Framework and Planning Practice Guidance. The statement demonstrates a 5.89 year housing land supply, a surplus of 1,899 homes above the five year requirement. As the Council is currently unaware of which sites within the 2019 HLS the appellant disputes, the Council will address any such disputes through a rebuttal statement.

5.2 Broadland District Council, and the Greater Norwich authorities as a whole, are acting wholly in accordance with the Government’s intentions to significantly boost the supply of land for housing. This is evidenced by the very significant increase in housing commitments since 2008, the excellent recent performances against the Housing Delivery Test, the Council’s extensive development enabling programme
and its ongoing commitments to work with partners to plan for the development needs of the Greater Norwich area.