

NORFOLK STRATEGIC FRAMEWORK STRATEGIC HOUSING DELIVERY STUDY





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STRATEGIC HOUSING DELIVERY STUDY

NORFOLK LOCAL AUTHORITIES

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NORFOLK LOCAL AUTHORITY REPRESENTATIVES

Kings Lynn and West Norfolk Council

Norwich City Council

Broadland District Council

North Norfolk Council

Great Yarmouth Borough Council

Breckland District Council

South Norfolk Council

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NP Law

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1 INTRODUCTION

1.1 BACKGROUND

This study has been prepared on behalf of the Norfolk Local Authorities in response to the Housing White Paper “Fixing our broken housing market” Feb 2017 which seeks more rapid delivery of housing across the UK.

The Norfolk Local Authorities jointly face a challenging future of more onerous targets for housing delivery than they have experienced in recent times. In preparation for addressing these new requirements, the Local Authorities have commissioned a Norfolk Strategic Framework (NSF) which seeks to accelerate growth and drive forward development plans, aiming to achieve more responsive timescales for housing delivery in line with policy expectations.

In the last five years the local planning authorities of Norfolk have in some instances struggled to meet their existing housing delivery targets, despite planning approvals and allocations being in place for several large strategic housing sites. This study seeks to improve understanding of key delivery issues and identify potential opportunities for improving their approach (where possible) to encourage housing development to proceed more rapidly and for planning permissions to result in actual delivery of housing on the ground in accordance with realistic housing trajectories.

1.2 AIMS AND OBJECTIVES

There is a growing level of national concern on the issue of housing delivery and the role of local authorities. Locally this includes the Norfolk Authorities. Although the County is varied and experiences are different for each housing market area, there is a growing evidence base that over recent years there has been a significant uplift in the number of extant planning consents without a corresponding increase in the rate of delivery of homes.

The Norfolk Authorities would therefore like to gain a better understanding of the time it takes for strategic scale sites identified for development through the local plan process to come forward for housing delivery and the reasons why this has sometimes varied from the timetable originally envisaged.

The Authorities also require guidance on what actions could be taken in future to increase both the speed of commencement on strategic sites and/or the rates of delivery on strategic sites. In addition to informing the content of the NSF, the project will be of use in the formulation of local planning policies and the operation of development management services and further potential for the results of the study to be taken into account of the review of the Strategic Economic Plan in 2017.

The key questions which this study seeks to respond to are as follows:

- **What is the ‘normal’ timeline for a large scale development to come to delivery?**
- **Is there a high level of expectation not being appropriately managed at the outset?**
- **Are there key stages in the planning process where excessive delay occurred & why?**
- **What external factors outside the public sector influence may have affected the rate at which sites come forward for development?**
- **What public sector interventions can help (both local & central government)?**
- **What innovative mechanisms for delivery are happening elsewhere?**

1.3 METHODOLOGY

This project is primarily focused on understanding the private sector drivers behind the pace of growth and housing delivery together with the challenges and successes in delivering strategic sites. The evidence base for the study has therefore been derived from direct contact with a range of local house builders, strategic land developers, planning consultants, land agents, and landowners. However, in order to prevent a one-sided view being presented, each of the local authorities were also contacted and involved in a workshop to discuss the initial findings of the study on 6th June 2017. The output of the workshop is explained in section 6.

The approach to the study can be summarised as follows:

- To undertake a high level review of national and local evidence about the time taken to deliver strategic scale housing sites (defined principally as sites delivering 500 homes or more, although for local purposes there are some smaller sites included) and establishing whether delivery issues being faced in Norfolk may be more or less acute than the national picture and the reasons for this; and
- Conduct a series of structured interviews with relevant people (this includes representatives of developers, agents, landowners and local authorities) to better understand the reasons for comparative success and failure of the 'Deep Dive' sites selected by the Norfolk Authorities, as set out in Appendix A. This will also provide a form of soft market testing to inform future strategic developments.

The methodology has several steps which are explained below:

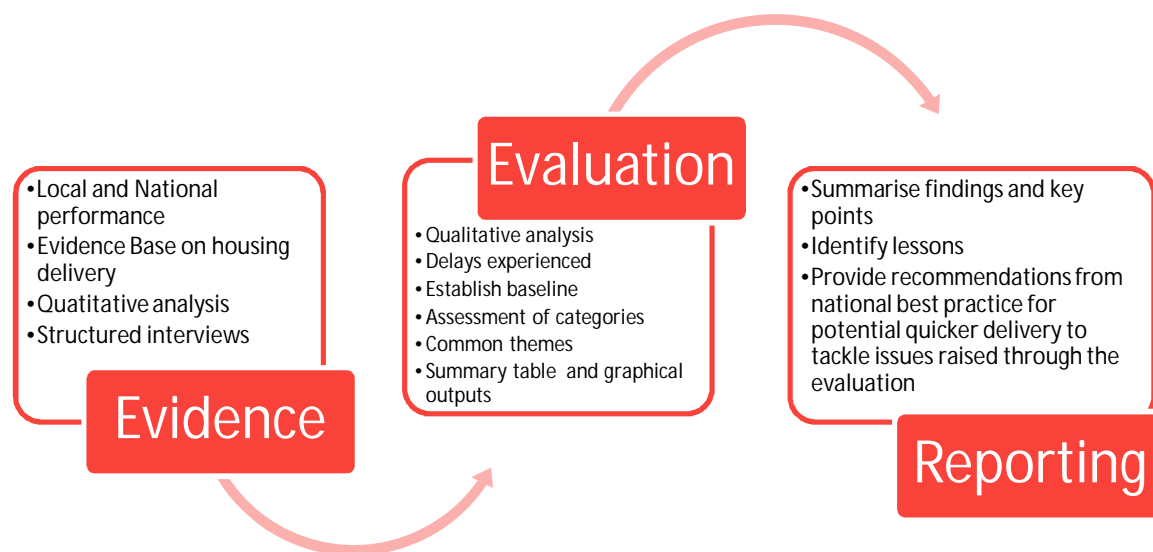


Figure 1 Appraisal Methodology

Development of the Evidence Base

To inform this study a review has been carried out covering local and national planning and housing policy. This includes the recently published White Paper which seeks to drive growth going forward, and the National Planning Policy Framework published in 2012, which has significantly changed the emphasis of UK policy.

For each local authority in Norfolk, the Local Plans and other relevant adopted and emerging planning documents have also been reviewed to understand, in particular, the role that strategic sites are envisaged to play in housing delivery in Norfolk and the extent of reliance on strategic allocations for achieving growth in comparison with smaller sites.

The socio-economic backdrop for the study has also been reviewed based on demographic and housing data from the UK census, comparing patterns between 2001 and 2011 to understand how the housing market and key drivers from growth may have changed over time for example in response to an aging population. The patterns within Norfolk have also been compared with other areas of the UK to identify comparator locations which may experience similar challenges with housing delivery.

It is also expected that the buoyancy of the local housing market is likely to be a key influential factor affecting developer decision making on when and where to invest and it is likely that development growth is naturally focussed on areas of higher value and those areas where house prices are rising more rapidly. To investigate this further, a review of house price data from Zoopla has been undertaken to identify how different areas within Norfolk have been affected by the housing market in the last decade, along with benchmarking against other UK locations.

In order to understand the housing trajectories which have been forecast by the various authorities and five year land supply (against which progress on housing delivery is typically measured), a review of Annual Monitoring Reports has been carried out, comparing this with the Local plan forecasts. To provide a fair comparison across the UK, the strategic housing delivery performance for areas with similar housing market values and socio-economic trends have been compared with those in Norfolk.

Case Studies

The study has been informed by case studies of 14 'Deep Dive' sites which were identified by the local authorities. The sites included in the case studies cover a range of scales and are spatially distributed across the Norfolk Local Authority areas. Background details such as planning references and key dates were provided to the project team by the LPAs. This data has been used to map out the timelines for planning, although not all sites had reached the same stage in the planning process – some had achieved allocation only, whilst others have progressed through outline planning, reserved matters and commenced delivery of housing.

Further background research was also carried out by WSP to review the progress and key issues, objections and planning conditions encountered through planning, as well as mapping the sites to understand potential delivery constraints and site-specific issues which may have affected development costs, infrastructure requirements and timescales.

Structured Developer Interviews

The developers of the 14 Deep Dive sites were invited to participate in the study and provide feedback on their experience of the planning system and strategic site delivery in Norfolk. The interview feedback has been collated in a database of anonymised records but seeks to identify the positive and negative lessons learned from practical experience.

The developers were also asked to make suggestions on opportunities for improvement of the local system within Norfolk and where possible comparing their experience with other local authorities across the UK. A consistent approach to the interviews was achieved via a standard pro-forma questionnaire which was used to guide the discussion. The pro-forma was not supplied to the developer but was used as a tool for capturing feedback on the key factors of interest to the study.

Analysis and Evaluation

The findings within this report are based on a variety of qualitative and quantitative data. Where possible, key trends have been mapped or analysed systematically but the interview feedback has also been grouped into key themes, seeking to identify the factors that have had the greatest influence and highlight recurring issues which could be translated into opportunities for further investigation and development.

Local Authority Officer Workshop

The initial findings of this study were presented to local authority planning policy and case officers at a workshop on 6th June 2017, seeking to understand the vision and aspirations of each district for housing delivery at the time of allocation, lessons learned from positive experience within Norfolk and the wider UK context and discussion of opportunities for tackling the key themes within the developer feedback.

The key element of the work is the structured interviews and qualitative analysis of the responses, together with quantitative analysis of Local Authority monitoring data combined with the qualitative information from the interviews to provide evidence to allow recommendations on making changes in the NSF.

We consider that currently the thinking is undermined by insufficient understanding of the relationship between planning permissions and completions, the commercial drivers of land promoters, house builders and other developers who bring forward land for housing development. This work seeks to test the factors behind this.

Factors to Test

The report considers that the main factors that might influence the time it takes to go from planning permission to a start on site through to completion, are as follows:

- Even in a buoyant market, there may be a tendency for developers to manage the delivery of private sale units in order to maintain sales values and address concerns about '**market absorption**' – supply and demand balance and housing stock flow into the market;
- Linked to the above there may be a **limited number of house builders** currently involved in Norfolk's housing market means slower delivery;
- **Concerns regarding build out costs**, including access to materials and the availability of construction staff, which may present additional barriers to increasing housing output;
- Understanding of the **site risk** – the **cost of delivering new physical infrastructure** necessary to support new development (eg. PT, rail, road and utilities) versus the **viability assessment at pre-planning** (particularly on marginal sites) and the associated phasing requirements for development – how long infrastructure takes to deliver (eg Norwich Northern Distributor Road);
- Small versus large sites, and the **role of scale** in terms of whether there is a focus on sites below <500 homes;
- **Condition discharge**, and delivering s106 **obligations** take longer than planned and timing of ecology/environmental mitigation. Planning permission often comes with stipulated requirements and conditions, which may themselves lead to further delay. This can be further delayed if there is major infrastructure or site remediation requirements. Conditions that have been agreed are renegotiated at reserved matters stage causing delays. This uncertainty can delay funding and financing;
- **Permitted scheme is not deliverable** due to onerous requirements – comes back for planning in revised form less acceptable to planning authorities, but better market value – lack of flexibility;
- Challenges with **land assembly** fall out or lack of agreement on **land values and cash-flow issues** for what are larger scale and more complex sites with greater abnormal costs. Linked to this are the form of contracts for promotion, purchase and construction/delivery of homes relate to market pressures. Sites with outline planning only may then be parcelled up and sold on for others to resolve reserved matters/conditions, introducing delay to agree this. For example, land promoters could derive their return from the granting of permission achieving a residential land value (with profit reflecting planning and land disposal risk) rather than the margin on the sale of houses (construction and sales risk);

- Developers buy the land (or option on the land) and gain consent in order to demonstrate to their shareholders that they have land available in the future to continue house building, so making them a worthwhile investment, and whether “**land banking**” exists. Albeit there may be maximum timescales before needing to trigger a return on the up-front investment on a site;
- **Changing economic climate** uncertainty versus mix of housing types, tenures consented; and
- **Outside/external factors from third parties** – unable to control utilities providers and time, for example Traffic Regulation Orders (TRO) and powers to deliver (eg any CPO) and third party land requirements.

Evaluation Criteria

Through the outcomes of the interviews we will categorise the reasons for the timescales into the following qualitative analysis headings:

Headline factors	Criteria
Nature of permission	Lead party (land promoter, developer, house builder, land owner etc) Reasons for seeking permission Priorities at start and now Re-planning proposals (new developer wants different)
Land related issues	Nature of contracts/investment/options – cash flow Risk management Banking land assets Point/timing of return (eg permission, sale etc)
Viability	Finance provisions Price issues Site currently not financially worthwhile pursuing (internal or external factors) Infrastructure requirements too onerous (utilities, transport etc) Costs of construction Lack of local skills/capacity to deliver Capacity of market (number of promoters/house builders in area)
Obligations / conditions take longer	Reliance on third parties Ecology/environment timing constraints Site remediation Technical work requirements
External influences	Market uncertainty due to changing economic climate Market absorption

Table 1 Key Criteria for Assessment

1.4 REPORT STRUCTURE

The remainder of the report is structured as follows:

Chapter 2 – Local Evidence Base and Policy

Chapter 3 – Socio-Economic Backdrop

Chapter 4 – The UK Context

Chapter 5 – Deep Dive Site Assessment

Chapter 6 – Housing Delivery timescales

Chapter 7 – Developer Perspectives

Chapter 8 –Key Factors affecting Delivery

Chapter 9 – Benchmarking & Best Practice

Chapter 10 – What Lessons Can Be Learnt?

Chapter 11 - Recommendations

2 LOCAL EVIDENCE BASE & POLICY

2.1 LOCAL HOUSING POLICY AND FORECASTING

Policy and guidance documents published by local authorities seek to guide development within the policy areas to appropriate locations which are expected to be sustainable and support local housing need. Housing development policies are primarily contained within local plan documents and this forms the basis against which all major planning applications are considered. Local Plans also set out housing targets and site specific requirements. These documents are developed over a number of years in an iterative process and are subject to extensive consultation and scrutiny via the Examination in Public (EiP process).

The local plan documents are underpinned by an evidence base which includes objectively assessed housing need and site availability assessments via the call for sites and SHLAA (Strategic Housing Land Availability Assessment) processes.

The adopted Local Plan documents which have been assessed as the basis for this research include the following:

- Breckland Local Plan – Preferred Directions, December 2015;
- Broadland Local Plan, Norwich Local Plan, South Norfolk Local Plan – Joint Core Strategy, January 2014;
- Great Yarmouth Local Plan – Core Strategy 2013 - 2030, December 2015;
- King's Lynn & West Norfolk Local Plan – Core Strategy, July 2011; and
- North Norfolk Local Plan – Core Strategy, September 2008.
- Greater Norwich Joint Core strategy
- Growth Triangle Area Action Plan

The outline targets set out within these local plan documents are summarised in Table 2 below.

The above listed local plans in most cases were developed prior to the housing market collapse in 2008 and subsequent recession which lasted until 2011 and prior to the major housing policy reform which came about in 2012 via the National Planning Policy Framework.

The information in the table shows the scale of housing proposed throughout Norfolk by district. This also highlights the local differences in housing policy throughout the county with annual housing trajectories ranging from 400 new homes per year to almost 900 on average, although several of the adopted local plans are now relatively old (eg North Norfolk and Kings Lynn/West Norfolk policies date back to 2001) and some authorities are at different stages in the development of their emerging policy which is also a material consideration in terms of 5 year land supply.

The various Norfolk authorities also have vastly different geographic scale and coverage, local characteristics and population as well as existing housing stock. Demand for new housing also varies depending on the buoyancy of the local housing market and population growth as well as economic factors such as employment growth, tourism and affordability of housing. The influence of local socio-economic factors is considered further in section 2.4 below.

Local Authority	Document	Plan Period	Housing Target	Annual Target	Other
Breckland	Breckland Local Plan Part 1 – Preferred Directions December 2015	2011 - 2036	14,925	597	Majority of new allocations within Attleborough. Thetford allocations are already committed.
Broadland	Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk	2008 - 2026	12,704 - 13,094	706 - 727	-
Great Yarmouth	Great Yarmouth Local Plan – Core Strategy 2013 – 2030	2013 - 2030	7,140	420 (average)	-
King's Lynn & West Norfolk	King's Lynn & West Norfolk Local Development Framework – Core Strategy	2001 - 2026	16,500	660	Majority of new allocations within King's Lynn. Downham Market allocations are already committed.
North Norfolk	North Norfolk Local Development Framework – Core Strategy	2001 - 2021	8,000	400	-
Norwich	Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk	2008 - 2026	8,592	477	-
South Norfolk	Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk	2008 - 2026	15,524 - 16,064	862 - 892	-

Table 2 - Summary of Norfolk LPA Local Plans

2.2 STRATEGIC SITE ALLOCATIONS IN NORFOLK

The majority of Local Authorities have allocated a range of sites but with a substantial proportion of the total in the form of larger sites which form strategic allocations with >500 dwellings. Sites of this scale are more likely to provide schools, shops and other supporting facilities as well as key infrastructure. Often strategic sites have been selected that are adjacent to key transport routes such as rail corridors and strategic roads (eg A11/A10/A47).

The local plan documents set out site specific requirements e.g. highway improvements, flood mitigation or school provision and the same is true for Norfolk districts. Some Local Plans are more prescriptive in the site specific wording of mitigation or other associated requirements. It would appear flood risk at sites within flood zones (King's Lynn and Great Yarmouth in particular) and perhaps in some cases upfront infrastructure costs are some of the biggest barriers to site development, as outlined in the local plans.

Remediation associated with redeveloping brownfield sites for housing is a key viability issue. However, in flood sensitive areas, brownfield sites are often easier to allocate as they already have hard landscaping and

their redevelopment would have less impact on flood plain. Brownfield sites have therefore emerged as sequentially preferable since they require less flood compensation and are less likely to increase risk.

2.3 HOUSING DELIVERY WITHIN NORFOLK

Each local authority produces an Annual Monitoring Report (AMR) which contains information on the progress with housing delivery against the forecast trajectory for housing delivery which is embedded within wider policy such as the Local Plans as outlined above. These AMRs contain observed data on actual delivery of housing and jobs across the district and they are a key piece of evidence on trends in local markets. Information from annual monitoring reports for each local authority is shown below in Table 3.

Local Authority	Document	2011 / 12	2012 / 13	2013 / 14	2014 / 15	2015 / 16	Average Annual Target*	Actual Annual Average	% of target
Breckland	Breckland Annual Monitoring Report 2016	346	329	425	491	619	764	442	58%
Broadland	Joint Core Strategy for Broadland, Norwich and South Norfolk Annual Monitoring Report 2015-2016	227	167	356	405	598	706	351	50%
Great Yarmouth	Annual Planning Monitoring Report	-	-	152	193	212	420	186	44%
King's Lynn & West Norfolk	Borough Council of King's Lynn and West Norfolk 2015/16 Housing Trajectory Commentary	624	322	472	313	520	661	450	68%
North Norfolk	North Norfolk Local Development Framework Annual Monitoring Report 2015 - 2016	-	242	383	503	479	400	402	100%
Norwich City	Joint Core Strategy for Broadland, Norwich and South Norfolk Annual Monitoring Report 2015-2016	280	407	210	252	365	477	303	63%
South Norfolk	Joint Core Strategy for Broadland, Norwich and South Norfolk Annual Monitoring Report 2015-2016	675	669	675	1019	765	862	775	90%
Norfolk Total	From Above	2152	2136	2673	3176	3558	4290	2998	70%

Table 3 - Norfolk Housing Completions 2011 - 2016

*Information taken from the Norfolk 2016 Housing Monitoring Report

In almost all cases, the above table shows that actual housing delivery in Norfolk has generally not kept pace with the projected housing delivery forecasts based on objectively assessed need enshrined in local policy.

North Norfolk and South Norfolk are shown to be the best performing districts and are generally on target in terms of delivering growth in accordance with envisaged trajectories. However, it should be noted that North Norfolk has the lowest target for housing delivery of all the authorities (with only 400 dwellings per annum as a target trajectory) and South Norfolk has the highest target of 862 dwellings per annum.

The majority of Norfolk Authorities have fallen behind their targets for housing delivery since 2001, in some cases by 50% or more. However, it is notable that there has been a general upward trend in completions within Breckland, Broadland and Great Yarmouth since 2011.

Overall the target for housing delivery across Norfolk was 4290 dwellings over the last five years but only 2998 were delivered, leaving a 30% gap in delivery across the county. The Norfolk Authorities consider that housing delivery could be improved if the key factors affecting delivery of strategic sites can be understood.

2.4 CIL AND LOCAL STRATEGIC INFRASTRUCTURE

The Community Infrastructure Levy is a planning charge on new development, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area.

Where CIL is in place, the monies collected are used towards the delivery of infrastructure and services required as a result of new housing and employment growth - for example, school places, strategic infrastructure and provision of public open space. Unlike Section 106 agreements, which are specific to each site in order to make them acceptable in planning terms, CIL is a levy on all development, designed to raise funds generally as a result of an increase in development in the district.

CIL Policy within North Norfolk

Introducing CIL has been considered previously in North Norfolk and if implemented would largely replace the current system of securing contributions from developers via Section 106 agreements. However, Section 106 agreements would likely continue being used to secure local site-related infrastructure such as open space, access and habitat protection, and affordable housing. If introduced, CIL would therefore operate in tandem with a scaled-back system of Section 106 agreements.

North Norfolk District Council undertook work in 2012 regarding the possible introduction of CIL, however, further work was suspended following a decision by Cabinet at the meeting on 15 July 2013. It was considered that although the Community Infrastructure Levy (CIL) had been introduced in other districts, it was felt that it did not provide enough value to make it viable in North Norfolk.

Evidence indicated that the growth that was planned in the district could be delivered without CIL and as market conditions continued to remain uncertain and delivery rates for development were already below required targets, it was likely that many large scale proposals would be unable to deliver fully policy compliant development whilst remaining commercially viable. Consequently, it was recommended that consideration of introducing the Community Infrastructure Levy should be suspended and reconsidered at a future date when there were clearer signs of economic recovery.

Greater Norwich Delivery Partnership (GNDP)

Since 2013/14 CIL policies have been adopted and implemented within the GNDP area around Norwich where Norwich City Council, Broadland District Council and South Norfolk Council work in partnership with the County Council and the New Anglia LEP in relation to strategic infrastructure delivery and funding. This is supported by adopted policies within the Joint Core Strategy. It is recognised that the policy required to support this approach takes significant resource and time to put into place and requires partnership working between infrastructure-led authorities (LHA) and housing-led authorities (LPAs). However, it is more likely to reduce the infrastructure delivery burden on strategic developers via a fairer system of pooled funding including smaller sites and hence improve opportunities for achieving on target delivery of affordable housing. Despite this, the negotiation of affordable housing via s106 may then focus on the phasing and timing of affordable housing delivery rather than quantum, so may again result in delay.

Within the Broadland Growth Triangle Area around Norwich, CIL contributions are helping to provide funding towards the delivery of the NDR (Northern Distributor Road) which was an essential strategic road infrastructure item to support the extent of allocated housing and employment growth – upto 10,000 new homes to the North East of Norwich on predominantly strategic sites along the NDR route have been unlocked by the capacity provided by the NDR. The County Council have been able to use their statutory powers to assemble the land required for the NDR and this is now under construction.

The CIL and corresponding infrastructure delivery plan, provides certainty that infrastructure and capacity to accommodate development sustainably will be forthcoming (especially where off-site infrastructure is a key issue on third party land which maybe beyond the control of a single developer). This places more reliance on the County Council resources to undertake the required land assembly and deliver major infrastructure schemes but they are often better placed and more able to assemble the land cost effectively using CPO powers which are not available to developers. However, due to the restriction on pooled contributions to a maximum of five sites, developments within CIL policy areas are often more likely to result in larger strategic allocations to enable sufficient revenue to be raised from five sites to pay for the required infrastructure.

There still remains the risk of funding gaps, for instance if a scheme is to be paid for by five sites but only three come forward, there may not be sufficient revenue to pay for all of the scheme or it may be delayed until more housing is brought forward. However, in some cases the Council has been able to take a loan to bridge the funding gap or secure additional investment via the LEP (eg the Greater Norwich City Deal) to help support housing investment.

Great Yarmouth

GYBC has chosen not to implement or move towards a CIL based infrastructure regime as yet.

Kings Lynn and West Norfolk

The Borough of Kings Lynn and West Norfolk have also recently introduced CIL. The CIL schedule and supporting documents were agreed and formally adopted at the full Council meeting on 19 January 2017. CIL formally commenced on 15 February 2017. From this date all planning permissions issued which are included in the Charging Schedule are liable to pay CIL. The draft charging schedule published for consultation in 2016 requires a contribution of upto £60 per m² for housing sites to the north and east of Kings Lynn, and upto £40 per m² for sites south and west of Kings Lynn. The urban unparished area of Kings Lynn itself has a much lower CIL rate of £10 per m². The CIL schedule also notably has a £0 per m² for several specified strategic development sites (>150 dwellings) where allocation or other policy requires associated site-specific infrastructure to be provided:

- Boal Quay, King's Lynn
- South of Parkway, King's Lynn
- Bankside – West Lynn,
- West Winch, strategic growth area
- East of Lynn Rd, Downham Market
- Wisbech Fringe, Walsoken

2.5 THE ROLE OF STRATEGIC SITES IN HOUSING DELIVERY

A wider dataset covering recent completions across the whole of Norfolk has been reviewed and the relationship between scale of growth and timescales for delivery has been considered.

In relation to the adopted local plans and emerging policy, the reliance on strategic sites is clear. This is intended to direct growth to sustainable locations, and enable new community facilities, open space and infrastructure to be delivered in addition to housing, so that there is wider benefit and increased opportunity for containment of trips and stimulating economic growth.

Across Norfolk, a small number of large scale strategic sites currently account for more than 50% of the planned growth. Therefore, in terms of delivery of dwellings and meeting housing need, it is vitally important

to make sure that these large scale sites proceed through the planning process, swiftly and efficiently, with appropriate stakeholder buy-in from an early stage. However, due to the complexity of larger scale sites and the associated infrastructure requirements, these sites are likely to experience longer lead time before development can commence.

The timescales for delivery of large sites have been seen to vary but the 6 year average quoted in the NLP study is beyond the five year land supply forecasting horizon, so a housing strategy which is overly reliant on large scale strategic sites is unlikely to meet delivery targets when measured to a 5 year timeframe. It could be that a longer term, more realistic housing trajectory is needed based on observed experiences if a strategy based on larger sites is required to enable sustainable growth to occur.

Alternatively, a more piecemeal approach which is more reliant on small to medium scale sites c100-300 units, which tend to be less reliant on strategic infrastructure, would help to overcome the delivery timescales. LPAs should therefore be more likely to achieve the 5 year supply criteria, albeit this could have a longer term detrimental impact on sustainability. Hence a carefully balanced housing strategy that seeks to meet housing need in a sustainable way, whilst enabling rapid delivery and market response. Norfolk authorities should ensure that the assessments of viability and delivery timescales that inform their Local Plans are rigorous to minimise delivery risks on allocated sites.

3 SOCIO-ECONOMIC BACKDROP

A review of Census data has been carried out, looking at changes in population by age, employment status and housing stock in Norfolk and comparing this with the rest of the UK. The maps in Appendix B indicate the key trends and socio-economic changes in Norfolk which may have influenced housing demand and growth:

Aging Population & Disability

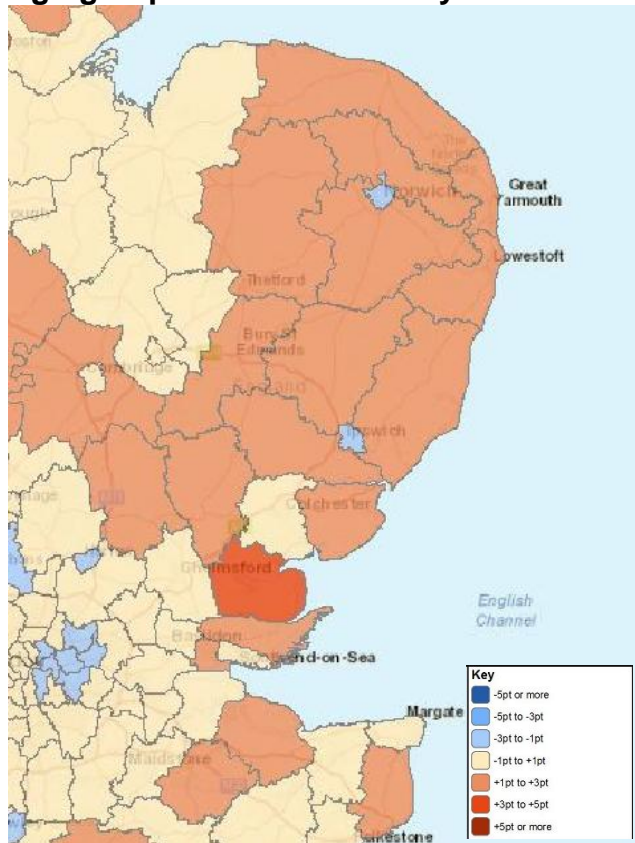


Figure 2 Growth in Population Aged 65-75 (Census 2011 versus 2001)

As shown in Figure 2, Norfolk generally has an aging population with the majority of Local Authorities outside of Norwich experiencing 1-3% growth in the population aged 65-75 years of age. Norwich has seen a decline in older population between the 2001 and 2011 census surveys. However, Kings Lynn has remained stable, with less than 1% increase in older residents.

The aging population can cause a problem in relation to occupation of housing stock if there is a lack of supply of additional suitable dwellings such as bungalows, retirement properties and lifetime homes. Linked to this, due to longer lifetimes, people naturally need more accessible places as mobility impairment tends to increase with age.

If new developments include additional purpose built property and accessible dwellings, this would enable existing housing stock to be freed up for those who have a need for housing.

Second homes

North Norfolk has the fourth highest number of second-owned homes in the country, according to a study by the National Housing Federation. Home Truths 2016/17 found that almost 10 per cent of all properties in the district - 5,006 homes - are second homes.

The prevalence of second homes is increasing, particularly along the Norfolk coast and around the Broads Area where there appear to be a growing trends for regular holiday makers who live outside the county boundary to invest in additional properties. This is seen as a negative by many, as it can increase housing need, especially for affordable dwellings, when local residents are priced out of the housing market by outsiders who do not contribute directly to the local economy on a full time basis.

Working from home

The extent to which home working is increasing due to availability of new technologies such as high speed broadband should also be taken into account, as people are becoming increasingly more able to work from remote locations and this means that they can live further away from the usual place of work or avoid the need for commuting entirely. A study undertaken by TUC indicates that in 2016, the number of people who worked from home had increased by a fifth over the last decade. With improvements in new technology and

increased access to high speed broadband, full time working from home is likely to further increase in the next decade and those who are office based are also likely to increase their frequency of working at home.

Data on Travel to Work patterns from the 2001 and 2011 Census have been compared to identify the extent to which working from home occurs within Norfolk. Table 4 indicates that the extent to which people work from home (as their usual workplace) has increased in the last 10 years, with North Norfolk currently showing the highest proportion of home workers and also the biggest percentage increase since 2001.

District	Census 2001	Census 2011	% Increase
Kings Lynn & West Norfolk	11.09%	11.84%	7%
North Norfolk	13.16%	15.80%	20%
Broadland	9.76%	10.93%	12%
Breckland	11.47%	12.20%	6%
Great Yarmouth	8.88%	9.25%	4%
Norwich	6.65%	7.66%	15%
South Norfolk	12.02%	12.96%	8%

Table 4 - Proportion of employed residents who worked at or from home (source: UK Census 2001 and 2011).

The increased propensity to work from home is likely to in the future create a more dispersed pattern of housing growth as people will be less constrained on choice of home location as advances in technology continue and there is likely to be more flexibility on how and when people travel. In the context of Norfolk, this could result in more remote areas becoming increasingly attractive for housing, if people are able to select where they live on the basis of non-employment related factors such as quality of life. However, this is likely to be dependent on the availability of high speed broadband infrastructure which can often more limited in rural areas, so may require policy support and additional investment as a catalyst for change.

3.1 THE LOCAL HOUSING MARKET

According to property website Zoopla “The current average value in Norfolk in May 2017 is £254,529. This has increased 1.59% from February 2017. Terraced properties sold for a current average value of £187,478 and semi-detached properties valued £216,891. In the past year property prices in Norfolk have increased 5.55%. This is according to Zoopla estimates, although it should be noted that housing stock varies significantly between areas.

In comparison with the whole of the UK, the average house price within Norfolk is very close to the UK average of £254,529 and also closely corresponds with Worcestershire, Herefordshire, Somerset, Cheshire, Isle of Wight and Southampton.

County/Region	Average House Price (May 2017)
East of England	£316,751
Bedfordshire	£305,060
Cambridgeshire	£352,937
Essex	£360,830
Hertfordshire	£502,765
Norfolk	£254,529
Peterborough	£217,712
Suffolk	£282,351

Figure 3 House prices comparison against neighbouring authorities

Within the East of England Norfolk is most similar to Suffolk and Bedfordshire in terms of current house values. However, average house prices within Norfolk are below the East of England average of £316,751. Within Norfolk, house prices vary considerably across the county, with over a £200,000 difference in average house price between the most expensive and least expensive areas of Wells Next the Sea versus Great

Yarmouth respectively. Comparing Figure 4 and Figure 5 below, it is also evident that within each District there is a wide range of values.

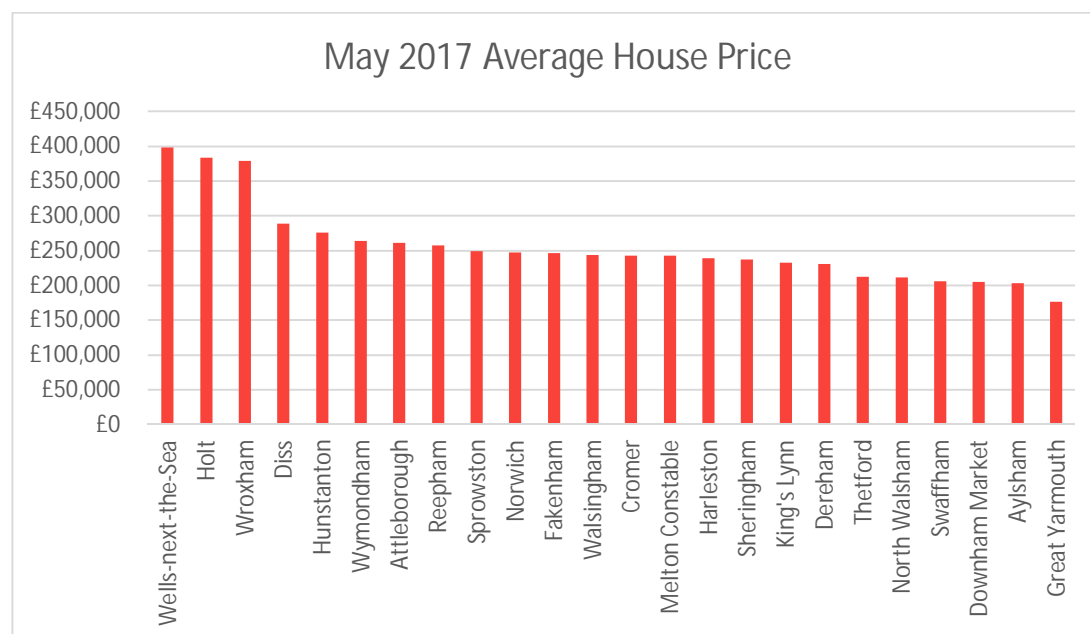


Figure 4 - May 2017 Average House Prices by Location (Zoopla)

The averages by District are shown below:

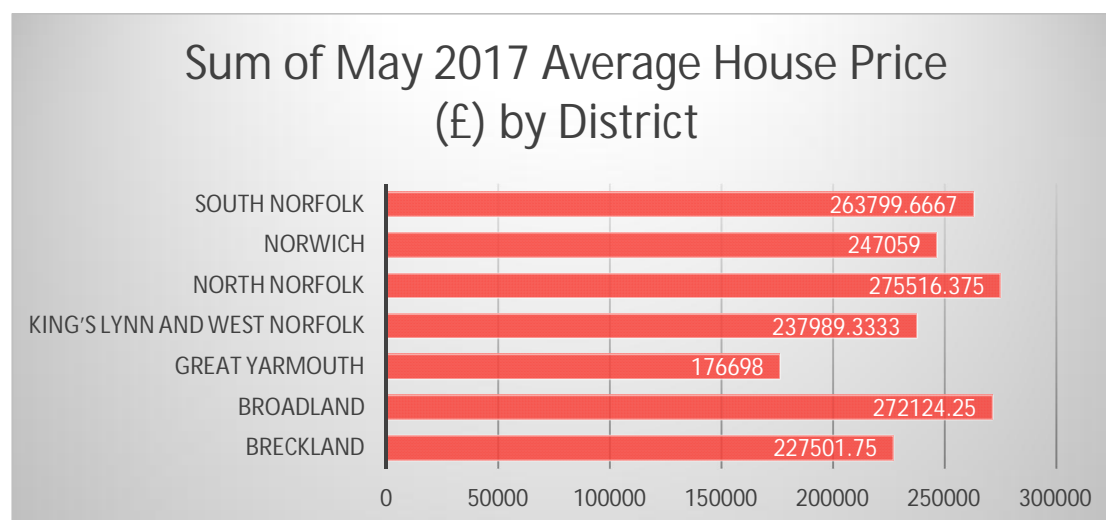


Figure 5 May 2017 Average House Prices by district (Zoopla)

3.2 LOCAL AFFORDABLE HOUSING POLICY

Within Norfolk, affordable housing requirements are embedded in local development policies. These vary across local authorities and can even vary considerably between neighbouring authorities and adjacent settlements, for example along the boundary of North Norfolk with Kings Lynn and West Norfolk there is a vast difference in policy with North Norfolk having the highest policy requirement of 45% affordable, whilst Kings Lynn & West Norfolk have one of the lowest requirements of just 20%. The differences between authorities are highlighted further in Table 5 below:

	District	Affordable Housing Policy Requirements (%)
Districts in Norfolk	Breckland	Breckland Council Affordable Housing Policy § 40% on all sites
	Broadland, Norwich City and South Norfolk	Policy 4 of the Joint Core Strategy § 20% on sites of 5-9 dwellings (or 0.2-0.4ha); § 30% on sites for 10-15 dwellings (or 0.4-0.6ha); § 33% on sites of 16 dwellings or more (or over 0.6ha) However, bullet point one can no longer be applied under the National Planning Policy of Nov 2014, and bullet point two only relates to sites of 11-15 dwellings (see Affordable Housing SPD 2015).
	Great Yarmouth	CS4 of the Great Yarmouth Local Plan Core Strategy 2013-2030 § 20% on sites with 5+ dwellings in Caister-on-Sea, Gorleston, Great Yarmouth North and Northern Rural (affordable housing sub-market area 1) § 10% on sites with 5+ dwellings in Bradwell, Great Yarmouth South and South Quay, Gorleston West and South West Rural (affordable housing sub-market area 2) § 10% on sites with 15+ dwellings in Great Yarmouth Town Centre (affordable housing sub-market area 3)
	King's Lynn & West Norfolk	Affordable Housing Policy § 15% within built up area of King's Lynn; § 20% in all other areas
	North Norfolk	Policy HO2 of Development Control Policies § 50% on schemes of 2+ units or on sites larger than 0.1ha in Service Villages § 45% on schemes of 10+ dwellings or sites larger than 0.33ha in Primary and Secondary Settlements;
Neighbouring Districts	East Cambridgeshire	Policy HOU3 of the Local Plan 2015 § 30% in the north of the district § 40% in the south of the district
	Fenland	Position Statement on Affordable Housing (guidelines only; decision to be made on case by case basis) § 20% on sites up to 9 dwellings § 30% on sites of 10-99 dwellings § 35% on sites of 100+ dwellings
	Forest Heath and St Edmundsbury	Joint Affordable Housing SPD § 20% on sites of 5-9 dwellings § 30% on sites of 10+ dwellings
	Mid Suffolk	Altered Policy H4 of Local Plan 35% site threshold being as followed:

		§ on sites of 15+ dwellings (or 0.5+ ha) in Stowmarket and Needham Market
		§ on sites of 5+ dwellings (or 0.17+ ha) in the remainder of Mid Suffolk
	South Holland	Requirements are currently being tested as part of the emerging Local Plan
		§ 33.3% (one third) of all developments of more than 10 dwellings (or max combined gross floor space of no more than 1000sqm)
	Waveney	Policy DM18 of the Affordable Housing SPD
		§ 35% on all sites

Table 5 - Affordable housing by District

There is a direct link between house prices and affordable housing requirements (but not with affordable housing need). The requirement for affordable housing is likely to be lower in areas with low property values, not necessarily because of lower need, but because a requirement more commensurate with the local need cannot be achieved because of viability considerations. Hence the areas more likely to be attractive to developers due to higher values will often also have high affordable housing requirements. (The need for affordable housing is usually higher in areas of high market value, where it is more difficult for key workers to find housing that they can afford, but the need may also be very high where house prices are lower but local incomes also lower).

The affordability of housing and lack of affordable housing stock within the market is a growing issue which the February 2017 UK Government White Paper seeks to address. However affordable housing is often the cornerstone of s106 negotiations and tends to be the item which is sought to be reduced by developers for sites where viability is a key issue. The ability and willingness to negotiate the affordable element of the development rests firmly with the Local Planning Authority, whilst the infrastructure requirements are often imposed via objections from the County Council or other third parties, so are not in the control of the LPA and if an onerous approach is taken to major enabling works (such as off-site utilities upgrades) the LPA can be left vulnerable to a reduction in the outturn affordable housing component delivered.

Larger scale sites often have more onerous requirements for strategic infrastructure to be delivered ahead of or alongside housing development, which affects viability, hence in some examples, a negotiated lower component of affordable housing has helped strategic sites to begin delivering housing more rapidly than in areas where more onerous policy requirements on affordable housing have been adhered to more strictly.

Section 106 negotiations, in particular affordable housing discussions, have been cited by developers and Local Authorities as a key source of delay and often these involve unpredictable legal administration costs which increase risk to developers and there is also a lack of finite time bounds for completing the negotiations (the planning system does not monitor this element of a permission but it has been seen as a recurring issue affecting timescales for delivery of housing).

In areas where local authorities have adopted CIL (Community Infrastructure Levy) policies in place, underpinned by strategic infrastructure frameworks, this appears to have been helpful in overcoming strategic infrastructure delivery issues. The CIL policies can also help to reduce the timescale impact of s106 negotiations and reduce legal fees and the resources required to undertake viability assessments for developers. The CIL policies also provide certainty for developers on contribution requirements from the outset so that there are no surprises at the s106 stage and less scope for reducing affordable housing.

4 THE UK CONTEXT

4.1 LITERATURE REVIEW

A literature review has been carried out of relevant background documents relating to housing delivery and policy. The aim of the literature review is to provide a comparative baseline for the research which will help to further inform and build upon the findings of this study.

The documents which have been reviewed include policy documents, monitoring reports, white papers and more.

This review has divided documents by document type. All of these documents broadly fall within three categories. These are:

- Policy and Guidance;
- House Building Studies; and
- Monitoring and Housebuilding Reports.

Policy documents include those written by central or local government which outline either policy relating to house building or set out a series of guidelines or best practice for stakeholders such as developers, land promoters/owners or agents/consultants.

House building studies are studies carried out by any organisation or individual e.g. local authorities, LEAs, academia, property developers, which have carried out research into any aspect of house building which may inform the challenges associated with this type of development be it economic, technical, environmental or other.

Monitoring reports and housebuilding rates are being reviewed in order to assess historic development across Norfolk and to identify trends or changes in recent years. If changes in house building are identified, contributory factors for this change will be examined.

4.2 NATIONAL POLICY AND GUIDANCE DOCUMENTS

The National Planning Policy Framework was published in 2012 seeking to enable and accelerate the delivery of sustainable development throughout the UK. The NPPF seeks to simplify the UK planning system, making it more explicitly linked to the Local Plan process, following the abolition of Regional Spatial Strategies in 2010 and actively seeks to encourage housing delivery and growth via a presumption in favour of sustainable development. The NPPF also seeks to drive forward and speed up the adoption of Local Plans to enable development to proceed in a coherent district-wide strategy and minimise the risk of less appropriate sites coming forward on the basis of appeals.

The NPPF indicates that Local Plans are those which were developed and adopted under the Planning and Compulsory Purchase Act published in 2004. Therefore where the most recent local plan was adopted before 2004, emerging policy can also be used as the basis for material planning considerations. The NPPF encourages housing developers to work more closely with Local Planning Authorities and local communities in the formulation of planning policy for example via the call for sites and SHLAA (Strategic Housing Land Availability Assessment) process. The SHLAA process involves developers putting forward sites for consideration for inclusion in the local plan making process and a risk-based scoring system is used to assess sites in terms of sustainability criteria to help sift out unsustainable sites (such as those within active flood plains or environmentally sensitive areas).

The Localism Agenda also has a role to play in the development of Neighbourhood Plans, which are also recognised in the NPPF. In recent times this has stimulated a key focus of activity predominantly in rural parishes developing plans based on a consultation-led approach within local communities.

However, in growing areas, this new accelerated approach places pressure on Local Planning Authorities to have local plans updated more rapidly and to demonstrate that they have a five year land supply in place.

The recently published UK Government Housing White Paper entitled “Fixing Our Broken Housing Market” explains the impact of increasing house prices and the barrier to progress which is considered by the Department of DCLG presented by unaffordable housing.

The White Paper states that “Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000”.

This economic situation is likely to have changed the housing market considerably since 2000, with the increased focus on rented accommodation and increasing need for affordable housing.

The White Paper has five key objectives to help address the issue of housing affordability:

- Increasing the amount of land available for development in areas of demand and to support this local plan process needs to keep pace with demand.
- Improving the rate of delivery once planning permissions are granted for new housing.
- Achieving a more open and accessible planning system, improved co-ordination of public investment in infrastructure, supporting timely utilities connections and tackling sources of delay.
- We’re giving councils and developers the tools they need to build more swiftly.
- Increasing supply of a range of housing types by diversification of the housing market and encouraging housing associations and local authorities to implement more housing, and attracting new investors including homes for rent.

4.3 HOUSE BUILDING STUDIES

Due to the social and political sensitivity surrounding the topic of house building, a vast array of studies have been carried out on this topic. It has been widely acknowledged that there are many difficulties and barriers within the current housing market and many organisations have views on how to address these barriers.

A number of studies, reports and white papers on the topic of house building and delivery have been compiled and reviewed in order to determine if there is any consensus amongst organisations conducting research in this field. These documents have been grouped into Government commissioned studies, Private Sector studies and Academic studies in order to see if different sectors have different viewpoints on the same topic.

4.3.1 GOVERNMENTAL STUDIES

Government is ultimately the key driving force for housing delivery in the UK whereby national and local Government have specific roles and responsibilities. It is Government policy which facilitates house building and delivery.

The documents in this category are:

- The Callcutt Review of Housing Delivery 2007;
- House of Commons Communities and Local Government Committee – Capacity in the Homebuilding Industry 2016-17;
- House of Commons Library Briefing Paper – Tackling the under supply of housing in England;
- A New Approach to Developer Contributions – A Report by the CIL Review Team 2016; and
- Local Government Association – Building Our Homes, Communities and Future 2016.

The Callcutt Review was commissioned in December 2006 by then Secretary of State for Communities and Local Government to “examine how the supply of new homes is influenced by the nature and structure of the housebuilding industry”, to consider how these factors contribute towards meeting Government’s house building target and to make recommendations for improvements.

It should be noted that this report explains that Government does not and will not place obligations on housebuilders but does suggest working in partnership with them. A situation whereby private sectors freely taken investment decisions lead to the delivery of the housing targets should be encouraged.

The review reaches a number of conclusions, one of which is that there is sufficient land available to meet the UK's housing needs and therefore perhaps in the eyes of the Government, land supply is not a key barrier to delivery. The review states that development within the countryside should be minimised with development taking place on brownfield sites within cities and towns where possible. This helps to minimise the risk of urban sprawl but does result in sites which are more expensive and slower to build out due to site complexities. The case may exist whereby housebuilders would rather develop greenfield sites, however this is not explicitly stated in the review. In contrast to the above statement the Communities and Local Government Committee states that development land is not in abundant supply in high demand areas, the areas in which people wish to live. To develop land in high demand areas may result in purposely slow delivery to increase return on higher upfront land costs in these areas and incentives to encourage faster build outs may act to reduce the attractiveness of a development. So there may be enough land to meet demand but is there enough land in the right places?

The Callcutt review acknowledges that inner city spaces are often deemed as risky projects by developers and there is work to be done make these sites attractive to investors but at the same time states that there is much to gain from an amicable relationship between local authorities and private sector developers, particularly in relation to community management. Local authorities have the scope to aid developers in this regard. This sentiment is mirrored by the Local Government Association but goes further to state that developers should support the delivery of strategies for supporting the diversification of the house building industry.

The Communities and Local Government Committee is of the opinion that there is little incentive for housebuilder to build at a quick rate even though there is no evidence of land banking. Regarding land-banks, the Callcutt review does not recommend action to force faster build out as the review is of the opinion that this will result in production risks rather than adding to it. This is however different to stipulating faster build out rates when disposing of land for housebuilding, provided that any loss of value which may incur as a result can be justified. The Local Government Association take a hard stance on this stating the Local Authorities should have the power to compulsory purchase land where not being built out. This stance is not common to other documents in this review as many believe this will act to discourage development.

There is the question of quantum of developers in the market place to consider. The Communities and Local Government Committee states that half of new builds are undertaken by eight companies and believes there is merit to encouraging smaller builders to build homes which would be aided with smaller development land parcels. Encouraging these smaller developers in the market may be difficult to do while still maintaining good developer relations with the larger builders as recommended in the Callcutt Review.

The House of Commons Library Briefing Paper makes the point that high land prices in themselves are a barrier to development as housebuilders are required to pay large sums for land without any security that any planning permission can be secured for the land. However the gain in value a planning permission brings does not lead to development but often to strategic land trading. This results in a situation whereby the main beneficiaries of housebuilding are the land owners and not the developers.

The same paper later goes on to recognise a divergence of opinion relating to Section 106 Agreements and to the Community Infrastructure Levy. Some are of the opinion that they act as a means to secure affordable housing and necessary infrastructure while other are of the viewpoint that they are a barrier to development, particularly for smaller housebuilders. The document 'A New Approach to Developer Contributions' by the CIL Review Team in fact then goes on to recommend that the CIL be replaced with a hybrid system of a broad and low level Local Infrastructure Tariff and Section 106 for larger developments.

The review recommends that the CIL be linked to the Local Plan so that it can feed into bigger plans. There is a clear acknowledgement that there are issues with the CIL and Section 106 processes and efforts are being made to amend this. Again in contrast to this the Local Government Association is of the opinion that CIL contributions should be increased. There is a trend emerging of varying opinions amongst various governmental organisations. The acknowledgement of an issue is universal but recommendation for solutions vary.

The above reports do contain some specific East of England findings which informed the interview process:

- CIL adoption rates are high in East of England relative to other parts of the UK;

- There are water and drainage capacity issues in East of England;
- Average house price increases are significantly exceeding increase in average earnings.
- East of England experienced the third highest increase in the number of dwellings in the UK between 1991 and 2011 at a 20% increase (behind Northern Ireland and South West).

4.3.2 PRIVATE SECTOR STUDIES

As it is the private sector which is ultimately responsible for delivering new homes it is their thoughts on the matter which have the potential to be most insightful. The studies listed below have been collected from a range of private sector bodies, from banks to property developers, in order to form a complete picture of the private sector market.

- Lloyds Bank Research Series – Housebuilding, Building for Growth 2015;
- Savills Policy Response – Housing White Paper 2017;
- Savills Spotlight – Planning: Uncertainty, Challenges and Opportunity 2016;
- CBI Housing Britain - Building New Homes for Growth 2014;
- RTPI – How best to unlock large scale housing development? 2013;
- RTPI Delivering Large Scale Housing – Unlocking Schemes and Sites to Help Meet the UK's Housing Needs 2013;
- Joseph Rowntree Foundation – How can the planning system deliver more housing? 2010; and
- Nathaniel Lichfield & Partners – Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? 2016.
- Barrett Homes - The Role of Land Pipelines in the UK Housebuilding Process

The review undertaken by Lloyds bank aims to provide an overview of the current state of the housebuilding industry by interviewing 106 UK housebuilders. It concludes that there is a generally positive outlook but yet there are challenges within the sector. One of which is a skills shortage as there is not a large enough skilled workforce available to fill demand for roles. This was echoed by many governmental studies. The Lloyds study provided a wealth of detailed information regarding the outlook of the construction industry. Some of the key findings are:

- 75% of SMEs see additional staff as an investment priority;
- 87% of housebuilders plan to increase the size of their workforce in the next 12 months;
- 24% state that a skills shortage is the biggest challenge currently facing their business;
- 58% of respondents believe that the sector has the resources it needs to play a role in managing the housing shortage;
- 46% blame a slow planning system as a factor contributing to the housing shortage and 42% cite opposition to construction projects; and
- 42% say that affordable housing obligations can be met but that they are concerned about the effect on profit.

These facts demonstrate a situation whereby there is a substantial desire for an industry to grow but there are clear difficulties in doing so. When asked about how developers planned to achieve growth, 30% of respondents stated that a part of their growth plan would include increasing demand for new property and 27% said they wished to build properties in more affluent areas. It is perhaps possible that land banking will occur to increase demand for housing and building in more affluent areas may be to the detriment of smaller rural communities.

Savills make the point in their policy response to the Housing White Paper that clear assessment of housing needs is required and this true assessment must feed into local plans. The need for plans with definite housing allocations is mirrored by RTPI. Savills appear to be of the broad opinion that housing targets are not realistically going to meet housing needs. Savills also point out that only 38% of English Local Authorities currently have an adopted local plan compliant with the National Planning Policy Framework. This in turn will not aid housing delivery. Savills also state that if speed of build out were considered to be an important factor during land promotion it could result in more housing coming forward more quickly. A point made by Savills in the Planning, Uncertainty, Challenges and Opportunity spotlight is that the absence of a five year supply of housing is a significant factor contributing to successful housing appeals as the lack of a supply 'makes it

clear that all policies in a plan which restrict housing development could be considered out of date'. Similar sentiments have been mirrored in other documents.

CBI set out a series of recommendations for means to encourage housebuilding and address many of the issues that review has identified but their recommendations largely put the responsibility on Government to provide more land for development, provide financial incentive for development and speed up the planning process. For example they recommend commitment from Government to start development of ten new garden communities by 2025 and giving local authorities incentive to review their greenbelts and release low environmental quality land for development.

These recommendations appear to be, at least in part, in conflict with those from Government who appear to broadly be of the opinion that there is land available for development but it is not being taken forward. AS RTPI point out, it is the common view of developers that it is restrictive policies which hinder housebuilding and new settlements are viewed as easier to develop. The Lloyds study largely found housebuilders were frustrated with slow planning systems and were looking to invest in land (although land was in short supply) is also in contradiction to the prevailing Governmental findings.

It is also thought by Nathaniel Lichfield & Partners that new settlements should be put forward for development and an increase in planning permissions would lead to more homes as there is no evidence of land banking present. This is a common view in the private sector. The review provides good baseline values from a survey of 70 sites which may offer a good comparison for Norfolk sites. These are:

- 3.9 years is the average lead in time for large sites prior to the submission of the first planning application;
- 6.1 years is the average planning approval period of schemes over 2,000 dwellings;
- The average annual build out rates for schemes over 2,000 dwellings is 161;
- There is an approximate 40% increase in the annual build rate for large sites delivering over 30% affordable housing compared to those delivering under 20%; and
- On average 50% more homes are built per annum on large greenfield sites compared to large brownfield sites.

This report goes on to make a number of recommendations for improvements, most of which have been stated in other documents. Amongst these it calls to adjust spatial strategies to take account of higher delivery rates in stronger local markets.

The Barratt Homes report on housing pipelines, derived from new 2017 Barbour ADI data also contains some useful evidence on timescales for delivery of homes and key indicators. For example this indicates that the estimated delivery of homes on a site with permission for 1000 dwellings is typically 100 dwellings per annum, so a 1000 home site would therefore take 10 years to build out. The report also refers to DCLG research which indicates that 10-20% of planning permissions never materialise into development on the ground because they expire prior to implementation, with a further 15% to 20% re-submitted as a fresh application. It is also recognised that 55% of all planning permissions in England are not held by builders at all and 87% of outline permissions are not held by builders.

The new data for 2017 presented in the Barratt report, from Barbour ABI, indicates that 'post-planning permission' development timescales have substantially increased as compared to the earlier LGA estimates of 1.7 to 3.2 years. On sites of 20 homes or more it now takes at least 4.0 years on average from the grant of detailed planning permission to site completion. The report identifies that it is taking longer to deliver new housing in the 'post-planning permission' Phases and the authors CW Economics infer that this is likely to be the result of (i) an increased burden of pre-commencement conditions and an increased reliance in England for housing delivery on 'large sites' that take longer to build out.

The RTPI Policy Paper 'Delivering Large Scale Housing' references general discontent with the current planning system. Some believe that the planning system is too bureaucratic while some believe it is too liberal but there is the overarching view that it is insufficient. RTPI also identify local objections as significant barriers to development and there is a resentment towards top down housing targets.

A number of recommendations outlined in this report around delivering large scale developments are set out in the report. The recommendations broadly focus around improving community engagement regarding development, increased local authority roles in land assembly, land risk sharing and incentives for faster building of large sites and linking of infrastructure expenditure with housing. The problems in the housing market identified by RTPI have also been identified by the Joseph Rowntree Foundation.

Recommendations put forward by the Joseph Rowntree Foundation are to bring forward bottom up targets from the local level ensuring enough housing is being built to meet local demand and including sufficient incentives for developers for local communities.

4.4 SUMMARY

Reviewing literature on the subject of housing delivery from a number of sources has highlighted the broad range of opinions. Many are of the opinion that a slow planning system is resulting in housing delivery delay while others blame an absence of suitably developable land. However others are of the view that there is adequate land available for development, just not in the most profitable locations to develop.

Governmental studies often state land banking as a possible cause for slow delivery and if not land banking, often purposely slow delivery so as not to oversaturate a local market is cited as a cause for delay. Governments and planning policy want development on brownfield sites wherever possible and practical but housebuilders would rather build on greenfield sites as this is cheaper and thus more profitable. There is a distinct conflict of ideologies here.

Although there is an apparent willingness for co-operation between private developers and other supporting private sector industries and Governments at all levels there appears to be blame culture between the parties. Government blame the need to make profit from housebuilding as a reason for delay while housebuilders blame slow and complex planning and constraints imposed on available sites. Therefore Government seems to struggle with a means of incentivising fast house building without discouraging housebuilders from developing a site.

A number of solutions to the slow housebuilding issue have been proposed in some of the documents considered above, such as:

- Breaking up site allocations into smaller parcels to encourage smaller developers into the market and increase competition;
- Compulsory purchase sites where build out is not taking place;
- Planning policy changes to add build out rates as part of allocations site specific requirements; and
- Provide financial incentives for a fast build out which will compensate developers for any loss of profit which may occur as a result.

At this stage, these ideas do not appear to be substantiated with a suitable evidence base which enables any of them to be put forward immediately as a definitive solution within Norfolk. However, these suggestions appear to be worthy of further assessment and consideration by the Norfolk Authorities in the context of this study.

5 DEEP DIVE SITE ASSESSMENT

5.1 SITE SELECTION

A total of 14 strategic housing sites were identified for consideration within this study. The sites were selected by the Local Authorities themselves as examples of larger sites (>100 dwellings). In most cases the sites involved more than one land owner or required major infrastructure or mitigation requirements. The purpose of the study was to investigate in more detail a range of examples varying in scale and location across Norfolk. The location of sites across the county is shown below in Figure 5. More detailed maps are provided in the appendices of the report.

Intentionally, the selection of sites has included a mix of those which had performed well and those which appear to be falling behind in terms of housing delivery. It was envisaged that this would allow the challenges faced by developers to be understood where sites have struggled to deliver housing, as well as deriving lessons learned and examples of best practice from those sites which have performed well.

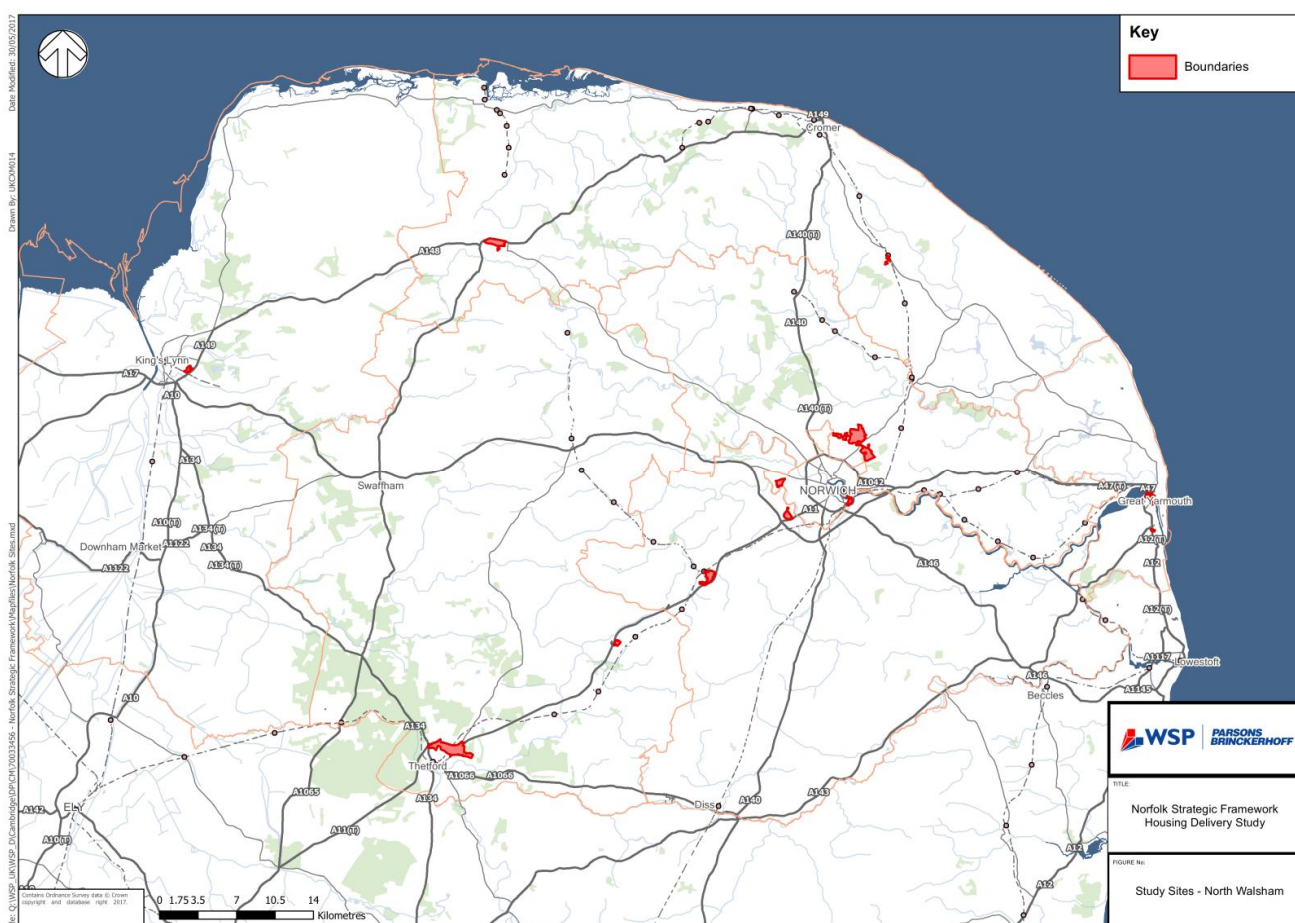


Figure 6 - Overview Map of Deep Dive Sites

Table 6 below summarises the list of sites considered and key statistics. More detailed on each of the sites

No	Local Authority	Site Name & Address	No of units	Allocation Date
1	Kings Lynn & West Norfolk	King's Reach, South Fairstead	395	1998 Local Plan – Policy 5/33 provision for 22.9 hectares of housing land in Lynn East at South Fairstead.
2	Kings Lynn & West Norfolk	South Fairstead, King Lynn	196	1998 Local Plan
3	Breckland	Thetford Sustainable Urban Extension	5000	Allocated through the Core Strategy (2009) and Thetford Area Action Plan DPDs (2012)
4	Breckland	Land at London Road, Attleborough	375	n/a
5	Broadland	Land to the North of Sprowston and Old Catton, Between Wroxham Road & St Faiths Road	3520	2016 (outline permission granted Feb 2016)
6	Broadland	Blue Boar Lane: White House Farm	1233 +460	2006 2016
7	Great Yarmouth	Great Yarmouth Waterfront	1000	2015
8	Great Yarmouth	East Anglian Way	100	2001
9	North Norfolk	Northern expansion of Fakenham	Up to 900	2011
10	North Norfolk	Former HL Food Site and adjacent land, North Walsham	400-500	2011
11	Norwich City Council	Three Score, Bowthorpe	1000	Originally allocated in 2004 Local Plan (HOU8). Reallocated in 2014 Local Plan
12	Norwich City	Deal Ground	550	Originally allocated for employment use in 2004 Local Plan. Reallocated for housing in 2014 Local Plan
13	South Norfolk	South Wymondham	1230	2015
14	South Norfolk	Roundhouse Park, Cringleford	1065	2003

Table 6 - List of Deep Dive Sites Considered

5.2 DATA COLLECTION & ANALYSIS

Structured interviews were undertaken involving the key private sector contacts for each of the Deep Dive sites identified above. The contributors to this study include housebuilders, strategic land developers, land owners, planning consultants and land agents.

The interview candidates were asked the same set of questions about their experience of development planning and delivery in Norfolk in relation to the specific Deep Dive site example. An interview pro-forma was prepared to guide discussions, so that a consistent approach was maintained as shown in Appendix C. However, to enable the discussion to flow and more widespread experience to inform the study, the questions were not always asked in the order of appearance in the questionnaire and the discussions were not always limited to the Deep Dive site in question.

The majority of the information gathered via the interview process was qualitative rather than quantitative data. The responses have therefore been categorised and grouped into key themes. The number of instances a particular issue has been cited by different contributors was used to rank the themes and suggestions as priorities for further investigation and action planning (as set out within Section 7).

The timeline information along with evidence from the planning portal has been used to understand the typical timescales for delivery. The developer responses have been categorised by delivery stage and listed against the original research questions posed in the interviews with anonymised responses from all sites summarised for each question.

It should be noted that at the time of conducting the interviews, some sites were at different stages of delivery (either land promotion, outline planning, reserved matters or construction), and different people have been involved at each stage, so the level of detail in responses provided often varied and in some instances the respondents were not able to fully answer all questions as their experience was limited to particular stages at which they had provided input to the project. In a small number of cases there are gaps in the evidence base where key individuals have moved on to other companies and it was not possible to contact them or they were unable to participate in the study as part of their new role.

6 HOUSING DELIVERY TIMESCALES

The timescales for each of the deep dive sites within the assessment have been mapped against key milestones as shown below (some have not completed the planning process and others went through planning prior to or in parallel with the allocation process, so equivalent data was not available for all sites).

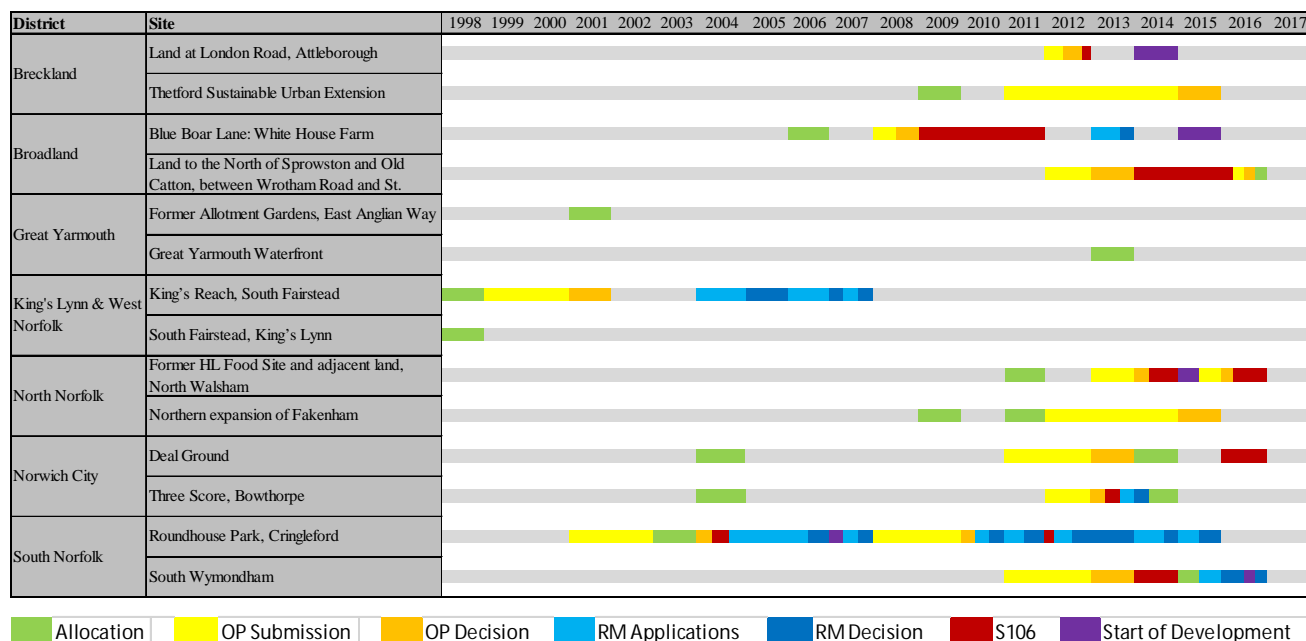


Figure 7- Timeline of Planning Progress for Deep Dive Sites

In relation to delivery of housing, two strategic sites in Great Yarmouth and one site in Kings Lynn have not progressed beyond allocation. Only 7 out of the 14 Deep Dive sites have reached or gone beyond the reserved matters stage and started to build out the permitted development with approximate timescales of 5-7 years from starting promotion to delivering houses.

The observed trends from the Deep Dive sites appear to be in line with national averages according the Savills research referred to in section 3.3 above. The Nathaniel Lichfield & Partners report entitled "Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?" (NLP, 2016) also indicates (based on a survey of 70 sites):

- 6.1 years is the average planning approval period for schemes over 2,000 dwellings;
- The average annual build out rates for schemes over 2,000 dwellings is 161 dpa;

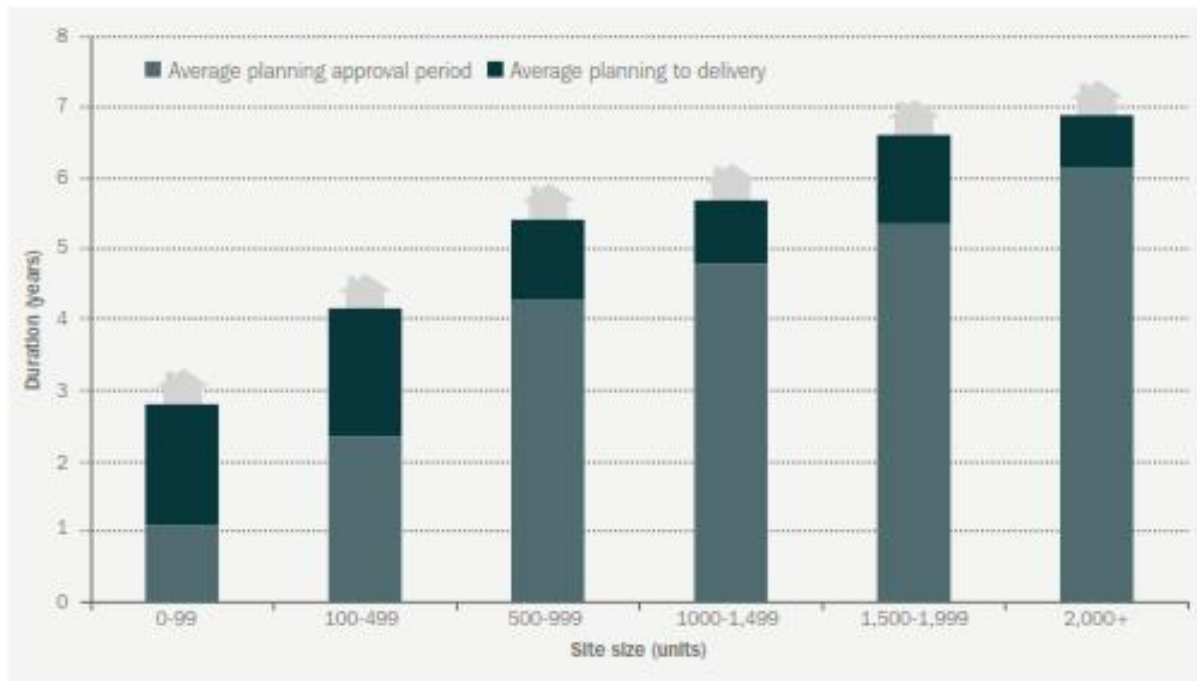


Figure 8- Average Timescales Planning to Delivery

(Source: Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?" NLP, 2016)

It is evident that those completing planning in parallel with the allocation process have performed better than others in terms of timescales completing the planning process. Feedback from developers and LPA representatives indicates that this approach to the planning of strategic sites is favoured as it enables the development proposals to inform policy and vice versa so that a practical approach to delivery is possible.

Some developers noted that Allocation wording and policy can be overly prescriptive which may be helpful for providing members of the public and decision makers with certainty on key principles but this can lead to inflexibility which in the fullness of time can leave developers less able to respond and adapt the development to suit changing market conditions.

The time required prior to submission also varies considerably, (ie the time involved promoting a site and seeking allocation then working up a planning application), this can depend on various factors the sensitivity of the site, the political climate in the local area, the appetite of the local housing market for new development and the complexity of land assembly (amongst others cited by developers). The NLP study indicates an average of 3.1 years based on a study of 70 sites but the timescales shown in Figure 9 below range from <1 to 8 years.

In most cases it also appears that in general sites being promoted and led by housing developers have been able to deliver housing more rapidly than those led by other types of organisation (strategic land developers, agents and landowners), these tend to be at the smaller end of the scale. However, there are some exceptions to this, for instance the land at South Wymondham which is a larger site being led by a strategic land promoter.

The statutory time limits for determining a planning application are usually 13 weeks for major development proposals and 8 weeks for all other types of development (unless an application is subject to an Environmental Impact Assessment, in which case a 16 week limit applies). The majority of the larger scale sites considered within this report are likely to fall into the category of EIA development, which further adds complexity, risk and cost to the planning process for developers.

Where a planning application takes longer than the statutory period to decide, and an extended period has not been agreed with the applicant, the government's policy is that the decision should be made within 26 weeks at most in order to comply with the 'planning guarantee'.

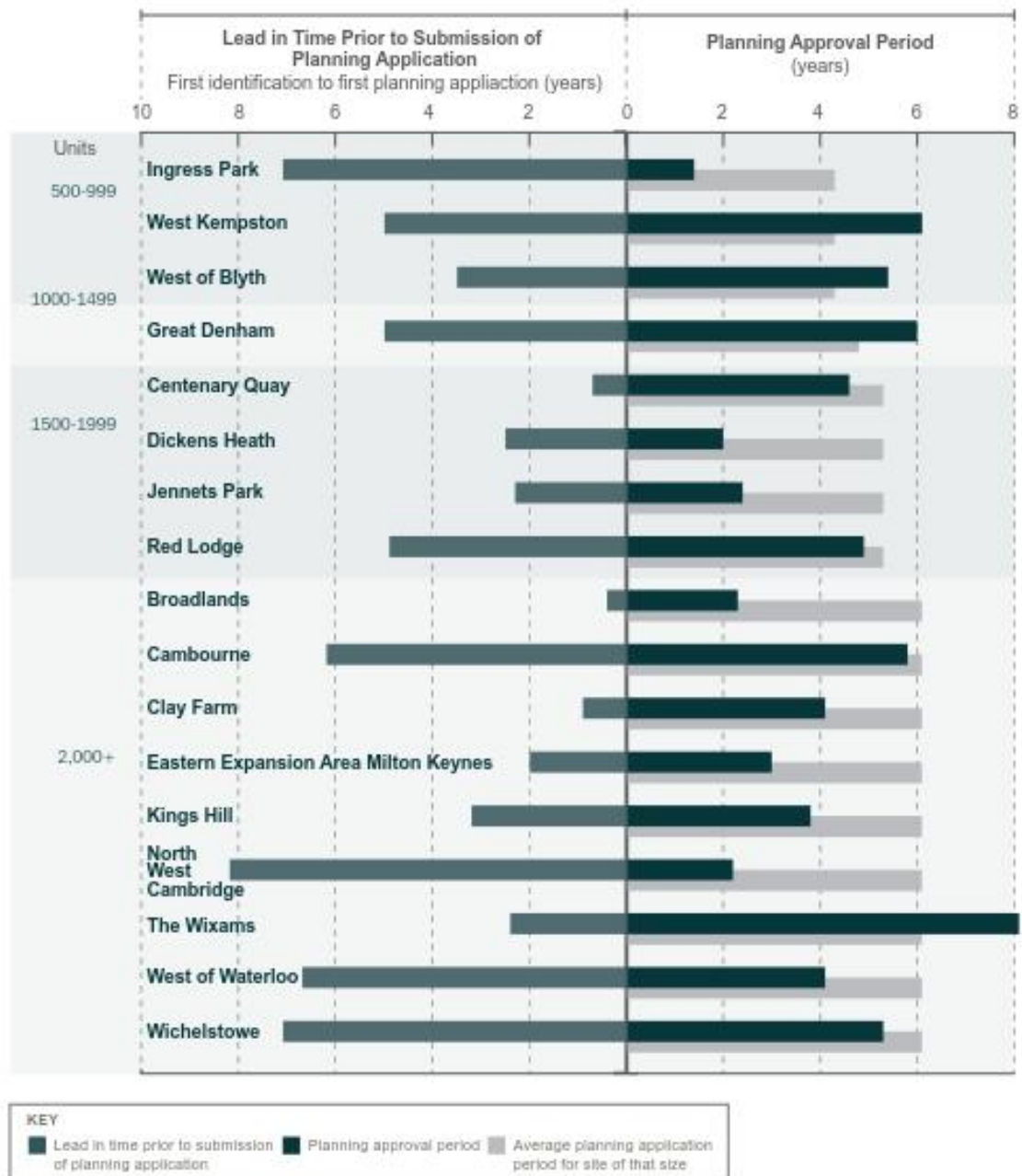


Figure 9- Large Site Timescales to Planning Submission and Determination

(Source: Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?" NLP, 2016)

The majority of the Deep Dive sites have exceeded the 13 or 16 week time limits in most cases by agreement with the developer. However, this was considered to be no different in Norfolk than elsewhere in the UK for sites in excess of 500 homes. Although it was thought to be possible for sites of 100-300 units to progress through planning within 13-16 weeks. The majority of developers could see that more time is generally needed for larger sites, (especially those which are coupled with major infrastructure or schools) and had low expectations of achieving the 13 or 16 week for large sites. However, where allocations and other adopted Area Action Plans or Development Briefs are already in place, many developers find this frustrating as they have often spent many years working up the supporting information alongside the District Councils and therefore, unless the proposals have changed significantly from the overarching policy, the developers can see no reason for delay.

6.1 IMPACT OF HOUSE VALUES ON DELIVERY

District	Site	Nearby Residential Area	May-07 Average Price Paid	May-12 Average Price Paid	May-17 Current Average Value	2007-2012 Sales	2012-2017 Sales	2007-2017 Value change	2007-2017 Value Change (%)
Breckland	Land at London Road, Attleborough	Attleborough NR17	£209,767	£221,222	£270,401	1,248	1,654	£53,580	25%
	Thetford Sustainable Urban Extension	Thetford IP24	£160,439	£170,246	£199,858	1,669	1,868	£36,528	22%
Broadland	Blue Boar Lane: White House Farm	Sprowston NR7	£191,392	£201,502	£249,257	2,180	2,694	£47,990	24%
	Land to the North of Sprowston and Old Catton, between Wrotham Road and St. Faith's Road	Catton NR6	£179,704	£190,336	£231,745	1,766	2,023	£44,611	24%
Great Yarmouth	Former Allotment Gardens, East Anglian Way	Great Yarmouth NR31	£153,173	£158,567	£184,540	3,164	3,683	£32,020	21%
	Great Yarmouth Waterfront	Great Yarmouth	£156,184	£161,495	£195,034	6,568	7,519	£29,797	18%
King's Lynn & West Norfolk	King's Reach, South Fairstead	King's Lynn	£191,167	£201,835	£238,474	7,400	8,449	£38,011	19%
	South Fairstead, King's Lynn	King's Lynn PE30	£143,795	£150,734	£178,923	2,921	3,264	£28,793	19%
North Norfolk	Former HL Food Site and adjacent land, North Walsham	North Walsham NR28	£182,775	£192,821	£236,285	1,186	1,467	£35,621	18%
	Northern expansion of Fakenham	Fakenham NR21	£210,871	£217,203	£269,930	1,165	1,475	£47,219	21%
Norwich City	Deal Ground	Norwich NR1	£172,624	£179,907	£223,663	2,303	2,549	£40,674	22%
	Three Score, Bowthorpe	Norwich NR5	£166,530	£178,111	£211,538	1,714	1,910	£40,343	24%
South Norfolk	Roundhouse Park, Cringleford	Cringleford NR4	£257,117	£270,875	£339,512	1,350	1,733	£66,664	24%
	South Wymondham	Wymondham NR18	£217,700	£232,483	£290,486	1,403	1,869	£60,613	26%

Table 7 - Average House Price Changes 2007-2017 in the vicinity of Deep Dive sites

It is apparent comparing the above table of Zoopla average house prices and reviewing the increases in average values evident over the last 5-10 years, that the areas which have seen the most significant average value uplift are strongly correlated with those that have progressed through planning most quickly and started to deliver housing. However, it should be noted that the average house price value can be skewed by the type and mix of housing stock and housing density which varies considerably throughout the study area – in urban areas there is likely to be a higher proportion of higher density, smaller properties than in rural areas where density is lower.

It is often difficult to separate cause and effect but the feedback from developers generally is that with strategic large scale sites a longer term vision is usually in mind so strategic land promoters and landowners are often able to wait for the market to pick up and expect fluctuations to arise.

In contrast, housebuilders tend to take a shorter term view and focus on delivering a single phase of large sites or individual small sites so are perhaps more sensitive to market value changes. However, the sites which have moved forward more quickly were well timed in relation to promoting the site and seeking allocation whilst the recession occurred in parallel with preparing an outline planning application and securing approval after the down turn so have been able to start delivering as values increased.

7 DEVELOPER PERSPECTIVES

7.1 SITE PROMOTION & ALLOCATION

When asked the question ‘What attracted you to invest in this site initially?’ Key influential factors cited by developers, land agents, strategic land promoters and landowners included accessibility to jobs in Norwich and rail services, A11, housing market growth areas, responding to demographic spread and aging population requirements – specific feedback included:

- The site has good access to central Norwich jobs & the rail station
- It is an attractive setting with good access to the A11, rail station and in easy reach of Norwich.
- The location was ideal for attracting rail commuters.
- The site is strongly located close to the Airport, NDR route and key jobs in Norwich.
- An option to purchase the site arose via the local authority and it was centrally located close to strategic access routes.
- The sites’ relationship with Norwich and the housing market were attractive. It seemed like a relatively low risk greenfield site which had potential to get through reserved matters quickly.
- We were instructed by the landowner to promote the land via the local plan process. At the time the local authority wanted to argue for higher targets and this fitted well with landowner aspirations. Initially it was slow progress to demonstrate the need and justify higher demand but eventually resulted in allocation of the site as a broad growth area.
- Proximity to town centre and rail station.
- Well located to cater for commuters to Norwich or Cambridge.

It is clear there is a general consensus that accessibility is vital to attracting developer investment in strategic sites, with the majority of those interviewed referring to key transport infrastructure and local facilities in established settlements and town centres as a catalyst for their decisions to invest and promote the site. There are also clear economic drivers such as proximity to local jobs and key employment areas such as central Norwich, and key business parks in A11/A47 corridors. The NDR route also seems to be a key catalyst for development in the rural fringe of Norwich.

The current Local Plans include strategic sites adjacent to the main rail corridors – this can be helpful to reduce reliance on cars for commuting and the opportunity to attract the commuter market. However this is a double edged sword as it involves people commuting away from Norfolk for instance to Cambridge, Ipswich and London. The challenge is therefore providing jobs in addition to homes to make homes attractive and stimulate further local economic growth. To encourage a more dispersed growth, more research and promotion is needed on local economy/jobs as well as quality of place to ensure developers see an attraction in building houses in all Norfolk locations and not just in Norwich or on key accessible routes such as A10, A11, A47 or the rail corridors.

The status and competitiveness of the housing market is also evidently a key factor for some affecting the decision to invest, with increased developer interest in areas with growing prices, although there is a difference between strategic site promoters who operate nationally and look for a more rapid return on investment than those who are local landowners, who often take a longer term view, seeking to promote land that they have already invested in to gain value from gaining an allocation, whilst still earning from the current (ag agricultural use of the land).

7.2 WHAT WENT WELL?

Key positive feedback was evident from more than 50% of developers interviewed regarding relationships with the Norfolk Authorities, including the following:

“We have had good continuity of officers and this has enabled a positive working relationship to be established, especially at the policy stage through the allocation process”

“Continuity of the main contact at LPA has been a positive. Have generally found that the policy officers have been very helpful at the allocation stage, in general they have been more effective than the development management team.

“The opportunity to present the scheme to members and the Town Council prior to submission was welcomed and this seemed to help inform the planning committee to be adequately briefed on a major scheme such as this ahead of the decision making process”.

“We seem to have built up a good working relationship with LPA – they are always responsive and positive. Local Authorities around Norwich in general seem to be doing a good job working together. The Joint Core Strategy and Greater Norwich Development Partnership are a good example of policy making which has worked well - without this it would be much harder to move forward”

“The planning process was relatively smooth, even though site overlaps 2 LPA boundaries”

“The LPA have an open door culture and this meant that officers were accessible to us. The developer was able to work jointly with local plan policy officers throughout the allocation process with the outline planning application being prepared in parallel with the draft allocation”.

“The requirement to prepare an AAP/Development Brief seems to have helped politically in addressing concerns from members at an early stage and has helped to fix several parameters and principles at an early stage.”

“The planning process was easier because the policies were in place and we followed the proper process”.

7.3 WHAT PROBLEMS WERE ENCOUNTERED?

Developers are finding that the costs and timescales associated with getting a strategic housing scheme through the planning process are increasing and when coupled with protracted timescales for determination and s106 agreements, this can have a substantial impact on development finances, whilst potentially leaving the project with more ground to make up in terms of viability from the outset.

In general the majority of developers when interviewed mentioned that they had encountered a more onerous system over the last 10 years, with increased upfront costs due to increased level of detail to consider at the outline planning stage, and additional surveys required by approving authorities in order to facilitate decision making. This issue is not unique to Norfolk. However, this seems to be at odds with planning policy which has also changed in parallel and now advocates that a more simplified pragmatic approach should be employed to help accelerate housing delivery. House builders consider that this more obstructive approach which seems to be championed predominantly by third party statutory consultees should be re-looked at seeking to limit objections to items which make a significant difference and deal with matters of detail by condition where possible.

Highways objections were quoted by housebuilders as a key source of delay, particularly at the reserved matters stage, despite experienced developers putting forward sustainable sites at accessible locations, with designs based on direct experience at other sites which have been approved and found to operate acceptably (albeit in other counties). The point was also highlighted that the extent of traffic modelling required at the outline stage needs to be proportionate to the scale of the development and sensitivity of the surrounding highway network. Whilst it is accepted that some sites will be more challenging than others, clearer guidance on modelling requirements may be helpful. On the other hand, strategic land promoters have generally stated that their experience on Highways has been positive at the outline planning stage. NCC offer a highway design and build service in house which is also relatively unique amongst local Highway Authorities.

The LLFA role and the changes surrounding the Flood and Water Management Act over the last few years have also been cited by more than one developer as a source of delay. In particular there is now much more

uncertainty over adoption of SUDs features, which is a real problem as the EA require there to be a sustainable surface water management train in place and often a strategic site-wide strategy is needed for large scale developments. Planning conditions requiring the detail of site-wide surface water strategies to be provided prior to development are then seen as problematic for developers as the design of the SUDs features can be heavily influenced by the adopting authority. For some sites this has caused delay with progressing reserved matters applications.

The recent change in guidance on climate change has also caused redesign of SUDs features (with the EA now seeking more capacity) which has been difficult to deal with at the reserved matters stage when parcels have already been allocated and viability has been assessed based on a specified number of units but increased requirements for SUDs and open space then reduce the developable area. This has also increased the complexity of land negotiations between strategic promoters, landowners and housebuilders which may have also contributed to the delayed delivery of housing.

Land assembly has also been a key factor for some site – as those with consortium agreements in place such as South Wymondham have delivered more quickly where landowners had less formal agreements in place such as Land north of Sprowston.

There is also an issue where some landowners have unrealistically high expectations on land value uplift associated with larger sites – they do not always perceive that there will be significant infrastructure required to support the proposed scale of development, or only partially realise this when deciding to invest. There are also examples where the housing market may not have performed as well as expected at the outset. This may be due their expectations not being appropriately managed but often there are hidden costs such as strategic utilities upgrades and off-site reinforcements totalling tens of millions of pounds in some cases that landowners may not be aware of at the outset (or capacity may be allocated elsewhere over time).

A more open dialogue with the utilities companies at the allocation/promotion stage is therefore likely to be of assistance and could be promoted by the Authorities. Whilst it is not the specific responsibility of the Norfolk Authorities to provide guidance or liaison with the utilities undertakers, it is perceived by developers that the LHA or LPAs could play a more active role, helping to facilitate such relationships or look at whether CIL or other funding sources have a role to play in delivering strategic utility capacity so that the cost of the upgrades could be more evenly distributed across all developments rather than over burdening the delivery of larger strategic sites.

7.4 WHAT WERE THE MAIN SOURCES OF PLANNING DELAY?

Allocation Issues

At the strategic allocation stage, several developers indicated that they experienced political opposition and poor support from council members from the outset, despite the need for a 5 year land supply to be in place. However, the political backdrop seems to be more sensitive in certain locations more so than others (particularly in urban areas along the east Norfolk coast). In coastal areas for instance, tourism is a key driver, more so than housing and Council members were considered to be extremely protective of sites with a former hotel use with a local presumption against change of use (eg to housing) for any sites that are in the primary tourism areas and to a slightly lesser extent in secondary tourism areas.

Feedback suggests that there are some sites which could potentially be unlocked for housing via change of use but this approach is typically opposed by members. It is felt that the focus on tourism as a priority rather than housing may have led to poorer or more challenging and less viable brownfield sites being allocated for housing which are intrinsically difficult to deliver, requiring significant mitigation (eg due to flood risk or contamination) and these are less attractive to housebuilders and developers from the outset. This may explain why allocations in Great Yarmouth have not translated into housing delivery and the housing market is more stagnant with lower values as the local plan policy is not helping to stimulate investment from housebuilders.

Outline Planning Stage Issues

An issue surrounding land assembly was raised by one team where there were several landowners within a strategic allocation site and they were all prepared to work together to promote the land for allocation but at the outline stage, some landowners were not signed up to a consortium agreement and decided to pull out, so

whilst the majority of land has been put forward for outline planning, the application has been complicated by EIA requirements to consider the full picture in the context of the wider allocation and cumulative effects.

Infrastructure delivery issues were cited by the majority of developers as a key risk to their scheme and the negotiations surrounding major infrastructure have been listed as a source of delay for large sites in particular. These issues are elaborated upon further in section 6.10 below.

As mentioned previously, the majority of outline planning applications for strategic sites struggle to meet the 13 or 16 week time window for determination, even if there has been good positive engagement over a number of years and the developer has worked in parallel with the LPA preparing and informing the site allocation process. The uncertainty of timescales for determination causes frustration amongst developers and housebuilders who are usually keen to build and respond to changing market conditions.

S106 Negotiations

S106 negotiations becoming protracted are also widely found to be a major source of delay – there are less time pressures at this stage of the process once a recommendation has been made and the timescales for agreement are generally not monitored or conditioned. However, developers and landowners may be incurring additional costs via loans and mortgages and unable to realise the value of this land until the s106 is signed and the delays also further protract the delivery of housing. Whilst it is acknowledged that sometimes the delay has been on the developer side, there have also been several reports of slow delivery and unresponsiveness on the part of the legal teams or with negotiations on affordable housing or infrastructure and travel plans.

The requirements for Travel Plan contributions are noted as becoming more onerous and costly to deal with – several developers seem to find this off-putting in comparison with other counties. For example the cost per house for the provision of travel information packs was highlighted as quite expensive in comparison with most other county councils, especially when factored up across a large scale development – developers of strategic sites consider that there should be economies of scale for larger sites and the cost per house should reduce in an inversely proportionate manner relative to the scale of development. On discussion with the LHA, it was explained their approach to travel plan delivery has more flexibility now with more prescriptive bond sums which are site related but in some cases, the developers are reliant on the travel plan as a form of mitigation for securing the mode shift required to enable the surrounding highway network to operate safely and efficiently. The monitoring included in the cost per household is also helpful in guiding when interventions are needed and sometimes this can be later than would be required if specific housing-related triggers are set in stone at the s106 stage. This approach is also less likely to cause development to halt when a specific trigger is reached.

During the S106 process, Several developers indicated that the standard template used by all of the Norfolk authorities for s106 agreements is better suited to smaller sites and does not lend itself to larger scale phased strategic developments where there are longer timeframes and more uncertainty around later phases. Whilst this was an issue mentioned by more than one developer, on discussion with NCC legal advisors, it was found that this is a historic issue that has more recently been addressed with a more flexible approach to s106 large sites going forward, and this is also more explicitly linked with the monitoring process, with a consistent approach and larger sites allocated to senior lawyers. Heads of Terms are now clarified earlier in the planning process for larger sites and a Developer Guide has been produced jointly with the Norfolk Authorities and their legal teams.

Reserved Matters

Several of the large scale allocations have achieved outline planning but have a huge number of pre-commencement conditions to deal with - this places a substantial resource requirement on the LPA and other agencies at the Reserved Matters stage and also makes it very onerous for the developer. Some sites have over 30 planning conditions to discharge. For some sites, site-wide pre commencement conditions and early stage enabling works with high cost or challenging delivery issues have left developers exposed to risk as they need to deal with major infrastructure costs up front but from a practical point of view require cash flow created by an early stage of housing to raise revenue to finance the infrastructure works. Cash flow is often a real problem for developers and can be more influential than overall viability but is not often looked at soon enough by developers and the LPAs do not tend to understand this well enough to be able to advise. In some cases this has left strategic land developers unwilling to commit resources to delivering houses and instead prefer to sell the site on.

7.5 INFRASTRUCTURE DELIVERY & VIABILITY

The Growth Triangle AAP (Area Action Plan) was recently adopted and the allocated sites along this route are now beginning to come forward through the planning process. The AAP includes several strategic housing allocations such as Beeston Park (Land north of Old Catton and Sprowston), part of the White House Farm site at Blue Boar Lane (GT20) and North Rackheath (GT16) amongst others. However, despite the evident upfront delivery of the NDR and the Postwick Hub A47 interchange, developers in the area are still concerned about the viability and cost of other strategic upgrades such as major utilities reinforcement, with insufficient capacity available in the local sewer and electricity network in particular, to support the allocated scale of development.

It is acknowledged that there was early engagement and dialogue through the JCS and AAP process with statutory undertakers such as UK Power Networks and Anglian Water as part of the AAP, ideally the required reinforcement infrastructure such as sewer pipes of sufficient scale and appropriate ducting for electricity to supply the housing could have been co-ordinated with the NDR works. If this is driven by individual developers, the works are likely to be in a piecemeal approach with multiple requirements for road openings. The recently published GNIP (Greater Norwich Infrastructure Plan) is starting to address this issue but still leaves the responsibility to implement major off-site utilities upgrades to statutory undertakers funded directly by individual developments.

Similar utilities and highways infrastructure co-ordination issues were also highlighted in relation to sites in South Norfolk, where for example, works to a rail underpass were delivered by Norfolk County Council on behalf of a developer and then later a strategic sewer needed to be installed, causing further disruption to the highway network.

Another recurring theme relating to strategic infrastructure cited by developers as a major problem causing delay to delivery or planning is the need for new strategic highway links crossing railways. Several of the sites allocated within Local plans are adjacent to railway lines and close to rail stations – whilst this makes the sites attractive in terms of future resident accessibility and there are increased opportunities for sustainable travel which may result in additional rail patronage, it does not seem to be recognised that new rail infrastructure and strategic roads crossing railways via underpasses is very costly and has a major impact on viability and delivery.

Network Rail (NR) are another example of a third party infrastructure provider that is not directly involved in planning infrastructure for new developments directly as a partner organisation in the local plan and site allocation process. NR therefore tend to be involved only as a statutory consultee at the planning stage and the feedback from developers tends to suggest that Network Rail seek to object to many planning applications involving works to the railway and are able to use their powers to hold the developer to ransom as they do not have any budget or revenue stream requiring them to contribute towards or help developers to deliver infrastructure.

Land assembly around the railway to deliver such schemes is also a problem which developers often struggle to overcome to deliver optimum solutions for access as they may not control all of the land on both sides of the line. Sometimes there is also unregistered land around the railway which is difficult to unlock without the ability to use statutory powers. Whilst there are Developer Service agreements available these take a substantial amount of time to negotiate and works around the railway need significant lead times due to the need for possessions. This also contributes to delayed delivery of housing if planning conditions or s106 requirements prevent a particular phase of housing coming forward until a specific infrastructure enhancement is in place. The cost of the works to the railway can be prohibitive to developers and where possible developers often actively avoid engaging with Network rail and push for alternatives which are perhaps less sustainable but are more affordable and easier and more practical to implement due to their extent of land holding or ability to control the delivery timescales where they are not reliant on Network Rail.

An innovative approach to strategic infrastructure delivery has been taken in Kings Lynn and West Norfolk, where the local authority has used an in-house team of developers to deliver housing as well as assembling the land required to support much needed strategic infrastructure enhancements such as new roads and strategic flood risk interventions using CPO powers (which are not available to private sector developers). The sale of (affordable and market housing) housing helps to raise revenues to pay for the infrastructure – this approach is likely to be best suited to challenging regeneration sites and may not be suitable for all authorities but offers a potential way forward for unlocking sites with third party land reliance for delivery of strategic

infrastructure. This approach is expected to help minimise risk of objection and ransom situations in relation to land assembly and site with a Network Rail or Broads Authority boundary.

7.6 ENVIRONMENTAL MITIGATION ISSUES

The majority of the sites within the Deep Dive assessment are large enough to require environmental Impact Assessments to be prepared. In relation to timescales this adds extra processes such as screening and scoping prior to assembling a planning application and also adds cost.

The developers interviewed were asked about the extent to which they have suffered delays due to EIA processes at the planning stage and if this has affected the timescales for delivery of housing beyond planning. The key areas of concern were noted in relation to environmental mitigation and challenge related to archaeology and ecology as well as flood risk for sites within the floodplain.

Several housebuilders and strategic developers have found that Archaeology costs and requirements have substantially increased over the last decade with much more onerous upfront survey requirements (such as geophysics surveys and trial trench evaluation of 3-5% of the site area) prior to submission (or in some cases during determination). Whilst it is very difficult to know what is below the ground, and in some cases there is a genuine need to excavate or preserve in situ important remains. In most cases the sites are relatively low risk and even where mitigation has been required, significant cost has been incurred with costs quoted of £30K-£60K per ha taking weeks of digging on site and the excavation has often only resulted in a small number of low grade finds which can seem like poor value for money.

The extents of archaeology mitigation areas required to be stripped has also often been considered to be overly extensive in some cases. Developers understandably seem frustrated by this. It would be helpful if below ground imaging techniques could be improved to enable more high quality geophysics results to be produced, so that intrusive testing is only required for high risk sites. Perhaps in some cases it may be more appropriate for developer contributions to be put towards research into improved below ground scanning and imaging technology development (which could also help to create high tech jobs or PhD opportunities) rather than intrusive investigation per se which can more radically impact on timescales and cost.

Ecology is the other key area where mitigation and upfront survey costs and timescales are having a significant impact but not translating proportionately into added value. Especially regarding off-site mitigation, Developers accept that they need to mitigate on-site impacts and follow Natural England licensing procedures to deal with directly affected species on site. However, there are often numerous requirements to undertake detailed population or activity surveys of off-site ecology, sometimes on third party land (eg Great Crested Newts) which can be costly, especially when the surveys have a finite shelf life of only 2 years. In some examples, where sites were close to designated areas but these did not fall within the red line, the survey requirements and level of scrutiny at the time of the planning application especially from other ecology-related consultees has gone far beyond what the developer considered to be a proportionate requirement.

In relation to flood risk and SUDs design, a small number of housebuilders seem to be generally perturbed by ever-increasing upfront costs and requirements for infiltration testing to be carried out to BRE365 standards at locations of proposed soakaways. However, developers in general can understand that flooding must be adequately managed in order to avoid damage to property and risk to lives.

Potential contamination of brownfield sites and requirements for intrusive testing and remediation was also noted as a key risk with associated time and cost impacts but developers tend to take a cautious approach and can understand the need for this, although the cost and risk aspect of dealing with contamination is generally off-putting for many house builders, so greenfield or lower risk brownfield sites are generally sought by developers. This may explain why the majority of brownfield site examples on the Deep Dive site assessment have yet to start to deliver housing, with the exception of the former HL food site in Fakenham.

8 KEY FACTORS AFFECTING DELIVERY

To summarise the outcomes of the developer interviews, the evidence base which informed this study suggests that key barriers and risks to housing delivery on strategic sites (once planning and reserved matters have been addressed) are predominantly related to the following factors:

- Expense and cash flow to support key strategic infrastructure delivery (especially where it is needed early on to unlock the scheme) Developers reluctant to proceed because money for strategic works stays in the ground for a very long time and they are likely to get a very slow return on investment - need help to access funding/lending opportunities (eg via NCC, HCA or LEP).
- LPAs do not seem to be properly geared up for dealing effectively with strategic sites – some officers are inexperienced and case officers are often under resourced or focussed on smaller sites. An A-Team of strategic site experts or dedicated person focussing on strategic land delivery is needed, rather than case officers getting bogged down in smaller sites.
- Growth can be more rapidly deliverable from smaller schemes <300 homes. Housebuilders can drive these sites themselves or strategic land promoters can easily market these to housebuilders once permission is secured. CIL can be used for strategic infrastructure.
- Affordable housing – there are significant variations in requirements between adjacent districts (eg North Norfolk 45%) but ultimately this is usually the key point of negotiations for developers and for large scale sites LPAs can lose out on affordable housing because of wider infrastructure and viability issues caused by third parties.
- Coastal and tourism areas – political difficulties re leisure and tourism industry. Planning constraints on former hotel sites – cannot change use even if not commercially viable to bring back into use.
- Lack of major housebuilders operating in Norfolk (TW, Persimmon, Hopkins, Bovis are the main ones). This limits capacity for building houses.
- Market conditions seen as better than some parts of UK but difficult to achieve high value in Norfolk generally. Development market more buoyant around Norwich where there are young people looking for housing and along rail routes where there is good access to other locations – these areas are more attractive to strategic land developers (where £200 per sq ft exceeded) but elsewhere less profitable. Despite this when compared to other coastal areas, Norfolk seen as less challenging due to relative flatness of land and limited environmental constraints eg in comparison with Cornwall.
- Sites near railway stations have been allocated but developers have found that working with Network Rail very challenging and this has sometimes resulted in a ransom situation which makes strategic infrastructure delivery (such as bridges and underpasses) off putting at the delivery stage. Hence developers seek to delay delivery of infrastructure as long as possible or invest in alternatives to avoid dealing with Network Rail.
- Developers feel that due to limited market and values, they need to work harder to differentiate their housing product in order to capture the market. Some feel pressure to deliver something really iconic to make sure that people want to live there. Whilst this would ultimately contribute to attractive place-making, this may push costs up and require a different approach to housebuilding (involving non-traditional housebuilders).
- In some locations brownfield sites have been allocated which need lots of intervention and infrastructure enhancements so are more challenging to get started due to cash flow requirements eg if a new bridge is needed for access they first need to sell some houses to pay for it. Placing housing in the floodplain is also not ideal and these sites should be allocated to less vulnerable development.

- There is a need to work in partnership with developers to minimise objections through the planning process and deal with issues by condition where possible so that delays are limited to points that actually add value to the development rather than points that make little difference but cause lots of delay.
- Archaeology is also seen as major cost item that could be made less onerous at the planning stage. Developers feel that (whilst some sites are sensitive and need mitigation), for less sensitive sites it can feel like a mechanism to keep people in jobs or do research rather than add value.
- In some cases land assembly has caused problems – where a large allocation is put forward involving multiple land owners, ideally consortium agreements should be put in place.
- Major off-site reinforcements for utilities is a key issue for strategic developments. Especially foul water and electricity. At present it is difficult/costly to secure capacity until planning is granted.
- Due to the longer term nature of strategic sites, the capacity may be soaked up by smaller sites which are able to progress more quickly before the larger site comes forward for build out. Needs earlier input on capacity planning to support strategic sites from key players such as AW and UKPN at the allocation stage and better support through the planning process.

To summarise in the context of the initial key factors considered within the assessment, a RAG matrix has been produced to indicate whether the factors identified at the start of the study were indeed factors that affected decisions to invest or promote one of the strategic Deep Dive sites. A summary of the matrix is provided in Table 8 below showing the prevalence of key factors affecting the delivery of strategic sites.

It is evident from the above table that the main recurring issues which have affected 50% or more of the sites as a primary factor are understanding of risk and infrastructure constraints and mitigation/reinforcement requirements, land assembly and land value/cash flow, as well as Third party issues such as utilities and stakeholder objections.

When secondary and primary factors are taken into account together (as shown blue in the table below), Concerns regarding build out costs and access to construction market, extensive and onerous conditions/s106 issues, as well as market absorption were also prevalent issue amongst the sites surveyed, with 57% citing this as a secondary or primary factor. However, the issue of scale is skewed by the range of sites which includes about half with less than 600 dwellings.

Hypothesis:	not evident as a key	Potentially a secondary factor	Likely to be a key factor	Primary or secondary factor
Market Absorption	43%	57%	0%	57%
Limited number of house builders currently involved in Norfolk's housing market;	50%	36%	14%	50%
Concerns regarding build out costs;	36%	43%	21%	64%
Understanding of the site risk – the cost of delivering new physical infrastructure necessary to support new development (eg. PT, rail, road and utilities) versus the viability	0%	29%	71%	100%
Small versus large sites, and the role of scale in terms of whether there is a focus on sites below <500 homes;	57%	14%	29%	43%
Condition discharge , and delivering s106 obligations take longer than planned and timing of ecology/environmental mitigation.	43%	14%	43%	57%
Permitted scheme is not deliverable due to onerous requirements – comes back for planning in revised form less acceptable to planning authorities, but better market value – lack of flexibility;	71%	7%	21%	29%
Challenges with land assembly fall out or lack of agreement on land values and cash-flow issues for what are larger scale and more complex sites with greater abnormal costs.	21%	29%	50%	79%
Developers buy the land (or option) and gain consent in order to demonstrate to their shareholders that they have land available in the future to continue house building.	79%	14%	7%	21%
Changing economic climate uncertainty versus mix of housing types, tenures consented; and	57%	21%	21%	43%
Outside/external factors from third parties – utilities providers, Traffic Regulation Orders (TRO) and powers to deliver (eg any CPO) on third party land.	21%	29%	50%	79%

Table 8 - Summary of Key Factors Affecting Housing Delivery for Deep Dive Sites

9 BENCHMARKING & BEST PRACTICE

9.1 HOW DOES NORFOLK COMPARE?

Developers were asked whether they had found the planning process easier or more challenging in Norfolk than in other counties and whether there were any examples of good practice from outside Norfolk. The anecdotal feedback from developers is summarised below:

“Cambridgeshire seem to be more accustomed and better resourced to deal with larger scale developments than Norfolk. Officers were helpful and accessible in Norfolk but often inexperienced in relation to larger sites or their hands were tied by local politics”.

“Greater Norwich local authorities seem to have a more positive and receptive attitude towards new development than other areas of experience for example in comparison with the Thames Valley authorities where there is a growing commuter market, the LPA stance is more fundamentally opposed to development”.

“Waveney have exemplar document production but housing land supply is clogged up. Waveney have joined up with SCDC and have in-house strategic planning officers which is helpful for larger scale sites”

“House values are slightly lower in Norfolk than some areas but we found that due to the topography being flat in Norfolk and available sites were relatively unconstrained, we expected that the timescales for planning would be more rapid and less onerous in terms of mitigation, so we decided it would be worthwhile investing in this area”

“The Norfolk Authorities are generally perceived as being slower performing through the planning process than neighbouring authorities. Most LPAs in Norfolk rarely meet 13 or 16 week window and routinely ask for time extensions to avoid penalties/appeals for non-determination.

“Officer experience needs to be suitable for the scale and type of development and sufficient resource needs to be available to respond to queries relating to allocated sites in a timely manner. The LPA should prioritise allocated strategic sites and give more resource to developers progressing these”. “For a similar scale scheme in Leicestershire, there were 3 officers at LPA and 3 at the LHA dealing with the site”.

“Other authorities have strategic development officers in place - Northants have this and seems to work well”.

“The reserved matters process was a longer more drawn out affair in Suffolk”

“Norfolk County Council Highways and Education departments have been helpful. They seem to have competent officers and have been reasonable to deal with”

Key trends apparent from the developer feedback seem to be focussed on the need for strategic development officers in Norfolk which has worked well elsewhere and that expectations for planning determination timescales for planning of large sites could be managed more effectively via PPAs in Norfolk.

Consultation and engagement also appears to be a key area of positive feedback where Norfolk Authorities can build upon their strength in attitude towards developers and open door policy. This could potentially be extended to early stage promotional activities working in partnership with developers to brief Members and council leaders to help reduce objections downstream within the planning process. Norfolk County Council have even started to brief and educate their members to enable them to understand how development sites are assessed from a technical point of view through planning.

9.2 COMPARATOR LOCATIONS

The socio-economic data on demographic trends and house prices has been used to identify locations in the wider UK which may be similar to the Norfolk housing market, so may have experienced similar challenges regarding development delivery. In particular, we have sought to identify local authorities which have already implemented practical solutions to help maximise housing growth in similar housing markets.

Based on the evidence base presented above, the following locations have been identified as potential comparators:

- Suffolk – East of England location with similar house prices and coastal location
- Bedfordshire - East of England location with similar house prices and demography
- Essex - East of England location with coastal boundary
- Lincolnshire – coastal boundary and similar demography
- Worcestershire – similar house prices and demography
- Herefordshire - similar house prices
- Somerset - similar house prices and coastal location
- Cheshire - similar house prices
- Isle of Wight and Southampton - similar house prices and coastal boundary
- Cornwall & Devon – similar coastal location and historic landscape

9.3 IDENTIFYING BEST PRACTICE

Taking the above comparator locations as the starting point for best practice research, several helpful examples were identified where other Local authorities are addressing the issue of housing delivery and working with developers and third parties to unlock growth on larger scale sites more efficiently. Relevant examples are shown in Appendix D and include:

The West of England (WofE) LEP and the four WofE authorities have published a planning toolkit which sets out their shared vision for a more positive and consistent planning system based on collaboration and engagement and outlines practical steps which the Councils and developers can take to improve the way large scale and complex planning applications are managed. It identifies shared commitments between the councils and developers for further improvement and greater consistency. The toolkit is divided into three sections:

- The culture, values and behaviour which underpin how the authorities will engage with business
- Improvements for handling large scale and complex proposals
- A practice guide to help the Councils and developers to work together more consistently.

The key ingredient that the LEP appear to have brought to the table in this example is commercial awareness. There appears to be knowledge sharing between the LEP and local authorities as well as developers to enlighten case officers and planning policy makers on viability issues and demonstrating that the authorities 'speak the language' of those with commercial interests.

A defined protocol also sets the framework for councillor and developer engagement on large scale sites, with the objective of supporting the delivery of sustainable economic growth and the creation of new jobs. It was informed by a West of England Member and Developer Summit (Building Trust) held on 23 October 2012. The LEP have subsequently published further technical guidance specifically related to large scale and complex planning applications to assist with early councillor engagement in the planning application process'. It provides a single, simple, set of guidelines which can apply across the West of England authorities for elected members who are on committees that decide planning applications on getting involved in the planning application process in relation to large scale and complex planning proposals.

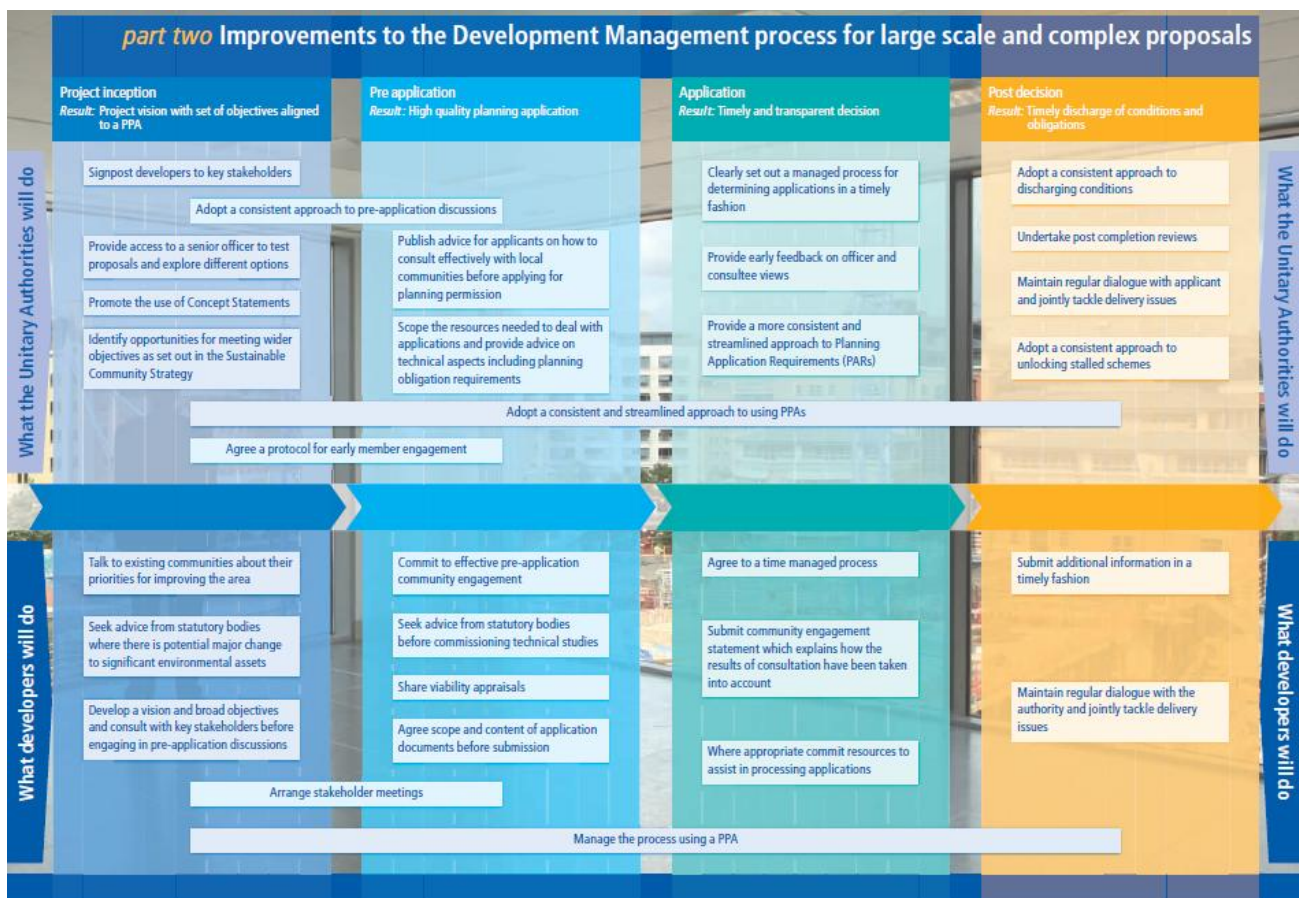


Figure 10 - Extract from West of England Planning Toolkit

Epping Forest are also moving towards a PPA-based system, seeking to meet their objectively assessed need for housing across the district. They have additionally invoked a developer forum. However, this is on a smaller scale at the District level which has not been as well received as it is more difficult to discuss general issues facing developers without getting into site-specific detail – the emphasis is considered to be too local and whilst developers regularly attend the meetings, they are often reluctant to share their experiences as they are worried about downstream impacts on their planning applications in the District.

Initiatives such as the Cambridgeshire Development Forum (CDF) are growing and becoming more prominent as a developer-led action group aiming to tackle barriers to housing and economic development delivery. The CDF was initiated by Savills and Endurance Estates Strategic Land and is led by a consortium of developers, rather than the LPA or County Council. Andrew Lansley former MP has been elected to Chair the meetings. This forum is currently engaging with the Mayor of Cambridge and Greater Cambridge Partnership, seeking to work proactively with them to unlock growth and accelerate delivery of infrastructure, utilities to support housing growth. This forum is starting to gain influence locally within Cambridgeshire in relation to development delivery and is particularly effective at bringing together various parties with local authorities to facilitate improved working relationships.

A best practice guide called 'Planning Positively Through Partnership' published by the Local Government Association, British Property Foundation and Home Builders Federation in association with the Planning Advisory Service has also recognised several good examples of how to do business with the development industry. These included Planning Performance Agreements in County Durham and Central Bedfordshire as well as early engagement and consultation on strategic sites.

The Housing Commission publication - 'Housing Shortages: What Councils Can Do,' which was jointly commissioned by LGA and DCLG, highlights the key role of councils in meeting the housing supply challenges in their areas and notes the entrepreneurial and innovative approach being taken by councils in bringing together partners, working with the community to secure support for much needed development and providing expertise and resources to support the successful completion of schemes.

South Gloucestershire council have put in place a PPA Charter since 2009 which is now recognised as a well-established system. As shown below in Figure 11, there is a defined protocol which is published explaining which sites the policy applies to and the process they will follow if a PPA is agreed.

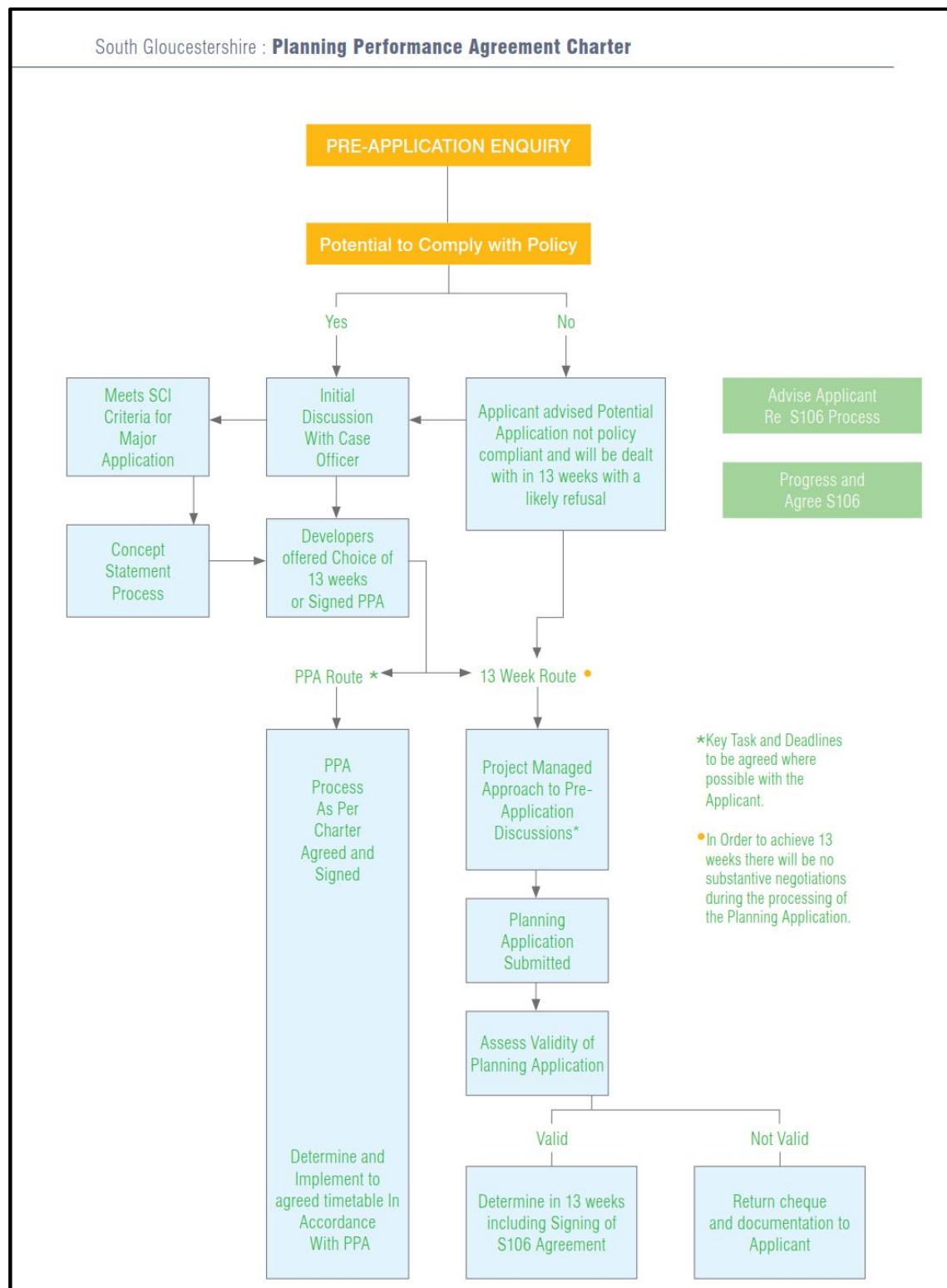


Figure 11 - South Gloucestershire Council (SGC) PPA Charter Process Flow Chart

The benefits of entering into a PPA are clearly set out as well as SGCs expectations of developers who are subject to PPAs. The Charter is applicable to large scale proposals of 200 or more dwellings or non-residential uses comprising floor space of 10,000sqm or more. There may be other complex or sensitive sites below these thresholds that may be suitable for a PPA by agreement. These will be treated on a case by case basis. This approach could be piloted in Norfolk, particularly where there are areas of higher demand such as Greater Norwich.

In relation to the second homes market, it is clear that parts of Cornwall have experienced the pressure this places on affordable housing by driving up prices and demand with external competition. Cornwall have taken the unusual step to intervene by actively discourage the uptake of second homes in some areas. Norfolk coastal areas experience similar seasonal issues and pressures. However, adopting the Cornwall approach may be too radical for parts of Norfolk that are reliant on the tourism industry economically. Therefore, it is more likely to be helpful to reduce the seasonality of tourism by encouraging investment in activities that operate all year round so that second home owners are attracted to spend more time in the county providing that sustained economic benefit throughout the year, rather than at only during the summer time. It is also recognised that often those investing in second homes, may also be seeking a future retirement home, and wish to become part of a community, even as a long term aspiration. This needs to be embraced and planned for with adequate provision for retirement homes and suitable accommodation if it is to become a sustainable aspect of Norfolk life in the longer term.

Due to the aging population of Norfolk, the recommendations in this report on retirement housing offer a potential opportunity for addressing housing need which is likely to have a good fit with commercial developers. An increased emphasis on retirement housing and also encouraging developers to include bungalows in rural areas and also to plan for lifetime homes in new housing would assist with freeing up standard housing stock that may be inappropriately occupied by elderly residents. With an aging population, planning for the future is vital and as a result of the topography, the East of England in general is a key area that is attractive to those with mobility impairments, so this is a potential market that can be explored further in Norfolk by creating accessible developments that are inclusive with high quality public realm. This will require a joined up approach with the Local Highway Authority.

10 WHAT LESSONS CAN BE LEARNT?

The following table suggests potential opportunities for addressing some of the developer issues raised within this study and discussion with the Norfolk Authorities at the workshop on 6th June 2017:

Planning Stage	Opportunity For Addressing Key Sources of Delay
Site Allocation policy	<p>Developers and LPAs need to build on the strength that has been identified of working co-operatively and in partnership where possible to promote sustainable sites which are relatively unconstrained.</p> <p>The LPAs could enable earlier opportunities for face to face meetings with Council Members which would potentially help to speed up the downstream approval process. Norfolk County Council have already commenced training of Members on how development sites are assessed to smooth the planning process. A similar approach could be undertaken more holistically across Norfolk that would help to maximise awareness and dialogue between developers and Members.</p> <p>In relation to strategic infrastructure – a key issue faced by developers is dealing with costly upgrades and lack of early engagement with utility undertakers. It would therefore be helpful for Local authorities to engage sooner with statutory undertakers (water, electricity, gas and sewerage treatment authorities) to understand where capacity exists in the system and where major upgrades may be needed prior to allocation. In the same way as an SFRA is produced, a similar county-wide or district-wide approach could be followed for strategic utilities infrastructure or whether major upgrades could be addressed via CIL contributions.</p> <p>To maximise speed of housing delivery and affordable housing targets, a more balanced mix of allocation sizes may be helpful – There has perhaps been a tendency for larger scale sites to be the main source of growth but these take much longer to come to fruition. The Norfolk Authorities should review whether this approach going forward remains appropriate. If delivery is key, it may be preferable to not be entirely dependent on 1-2 large scale sites for housing delivery across an entire district. More sites in the mid-range scale (100-300 units) could be included at allocation stage, with CIL used to obtain pooled infrastructure funding. This will help to attract housebuilders to take the lead on development.</p> <p>Where possible, brownfield sites that require significant mitigation within flood risk areas, should be allocated for less vulnerable development rather than housing. In tourism areas, perhaps these sites could be allocated for mixed use including retail, employment and hotels so that there is some flexibility and no overall loss of tourism land but enabling housing (especially affordable housing) to come forward on former hotel sites or greenfield sites to maximise opportunity for housing developers to be attracted to invest. Increased opportunity for medium scale sites may also help to stimulate more housebuilders to operate in Norfolk.</p> <p>Alternatively, building upon the success of the Kings Lynn and West Norfolk in-house development and regeneration team, other local authorities could take on a role in delivering brownfield sites or those with challenging infrastructure or access requirements that would make them less attractive to a commercial developer.</p> <p>Where possible, site allocations could seek to promote competition between developers which may help to encourage more rapid delivery of homes or stimulate a need for simultaneous development on two sites which may help to attract more housebuilders to the area. For instance if two similar scale sites are allocated in close proximity – there would be a certain amount of peer pressure on both developers to create vibrant and high quality places in order to maximise their market share.</p>

Strategic Infrastructure	<p>An early indication of strategic infrastructure requirements for larger sites is essential (especially utilities reinforcements, highways and flood risk mitigation), working with statutory undertakers and NR sooner to make sure the authorities are planning for growth coherently so the delivery delays are minimised.</p> <p>The LEP and other agencies should also be involved in strategic sites to maximise opportunity for external funding to assist with cash flow in early stages. Interface with the LEP could also offer an insight into investment opportunities and how to stimulate additional local employment growth as a catalyst for housing growth.</p> <p>The County Council already use their in-house expertise to assist developers with delivery of infrastructure. Taking this a step further, pay-back mechanisms to enable housing delivery to pay off infrastructure costs could be included within the s106.</p> <p>Minimising the number of landowners has also been found to be helpful for strategic sites. However, the use of Local Authority CPO powers should be considered for securing third party land where strategic infrastructure is required (albeit Crown land is exempt from such processes).</p>
Outline Planning	<p>In several cases, developers have suggested that a PPA (Planning Performance Agreement) would be useful to improve certainty on application determination timescales. It may not be realistic to meet a 13 or 16 week time window for a major strategic site but it is considered by developers to be better and clearer to agree a realistic programme for determination.</p> <p>To minimise risk of land assembly issues, a condition of the PPA could also be that a consortium agreement is required amongst the landowners of strategic sites (if more than one applicant).</p> <p>For strategic sites a suitably experienced case officer is required – ideally a strategic sites officer who predominantly deals with larger allocation sites. They also need to be empowered to make appropriate decisions and able to respond swiftly, without being bogged down – this could be a shared role between neighbouring authorities if unable to resource a full time person or if insufficient workload arises from a single authority. Strategic developers may also be prepared to contribute towards financing this role. It was also suggested that regular steering group meetings should be held with senior portfolio holders for large scale allocated sites.</p> <p>Delivery timescales can be affected by environmental risks and the need for extensive surveys which are seasonally constrained such as ecology or requiring a long duration of intrusive site work (such as archaeology). Norfolk tends to have a higher prevalence of heritage assets than some parts of the UK. It needs to be recognised that in the majority of cases, mitigation can be provided and the site selection process is generally guided by sustainability appraisal and environmental risk assessment. Therefore to avoid planning permission delays, it may be helpful for lower risk sites, if any non-essential detailed surveys are able to be conditioned and carried out prior to construction, rather than during determination.</p>
S106	<p>A time limit for closing out discussions or a PPA could be applied to this stage, similar to a game of chess. An appropriate time limit (eg one year for large sites) could be applied and a review carried out after the tie has elapsed.</p> <p>Delivery of affordable housing should be incentivised where possible and not delayed or overall quantum reduced significantly in response to viability issues. However a more flexible approach is required to enable early stages of development to proceed. This could instead be balanced against revised trigger points for other items to assist with cash flow.</p>

S106 legal issues	<p>A more flexible or phased approach to s106 drafting and Heads of Terms has already started to be put in place in response to some of the previous experience identified in this report (as the sites went through the s106 process before this new procedure was developed). However, it is clear that some flexibility is essential for longer term developments where there is more certainty on the earlier phases but over a longer period of time markets and policies change, so an opportunity to reopen discussions around later phases eg with a forward looking review would make the approach more adaptable and responsive to market conditions which may not be as restrictive to housing delivery. This also gives LPAs an opportunity to relook at affordable housing in the context of updated viability assessments.</p> <p>A delivery-led/cash-flow based approach would also be helpful when deciding whether site-wide and pre-commencement conditions are practical. A condition or s106 item could be imposed requiring a Housing Delivery Plan to be agreed with targets for housing delivery agreed upfront which could be enforced or incentivised based on actual outturn delivery. A review mechanism would be needed to support this to make sure that the targets remain appropriate and fair.</p> <p>For large sites a phased expiry of outline planning could also be proposed, so each phase has a defined time limit for making a material start on site, rather than a single eg 5 year trigger for the whole site.</p>
Reserved Matters	<p>The LPA could work with LHA, LLFA and other statutory consultees to ensure that any objections are limited to those with issues where there is good reason for objection and delay, rather than causing delay without adding value. Developers are more likely to respond to a commercially driven approach where they can see there is a mutual benefit eg in terms of value uplift on the housing for making a particular change.</p>
Housing Delivery/Enforcement	<p>Enforcement officers could help to follow up with developers to seek feedback on why development is not proceeding in line with agreed housing trajectories. In extreme cases, financial penalties or compulsory purchase powers could be used to obtain/control sites where build out is not taking place. For example where a Local Authority is entirely reliant on a large scale strategic housing site for delivery of the majority of its housing targets and has invested many years of planning input to get the site through allocation and secure permission, lack of delivery then frustrates the whole planning process. Or financial incentives could be applied to encourage more rapid build out which will compensate developers for any loss of profit which may occur as a result.</p> <p>The National Construction College East is conveniently located in Norfolk near to Kings Lynn and there may be potential opportunities for this organisation to be engaged more holistically in development delivery. Given the local capacity constraints on supply chain locally with a limited number of housebuilders operating within Norfolk, the NCCE could potentially assist with additional resource for local builders by providing placements on strategic sites, with s106 contributions towards the college development.</p>

Table 9 Key opportunities for accelerating housing delivery in Norfolk

11 RECOMMENDATIONS

11.1 ADDRESSING KEY FACTORS AFFECTING DELIVERY

Taking the most prevalent factors that were highlighted by developers as affecting housing delivery during the deep dive sites review, it is recommended that the Norfolk Authorities look into the following in more detail:

Understanding of the site risk – the cost of delivering new physical infrastructure necessary to support new development (eg. PT, rail, road and utilities) versus the viability assessment at pre-planning (particularly on marginal sites) and the associated phasing requirements for development – how long infrastructure takes to deliver (eg Norwich Northern Distributer Road);

Undertake a strategic utilities assessment prior to allocation to understand the district-wide infrastructure requirements or require developers to investigate this for their individual site and submit information on this as part of SHLAA/call for sites process.

Engage with statutory undertakers earlier in the process and seek their buy-in. It is assumed that developers will pay for infrastructure regardless of cost but in constrained market conditions this leads to poor viability.

Engage with Network Rail sooner regarding infrastructure issues affecting accessibility of strategic sites and seek an undertaking that NR will not hold developers to ransom. Consider the use of statutory powers eg TWAO to assist with the delivery of essential infrastructure.

Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and not covered by CIL.

Challenges with land assembly fall out or lack of agreement on land values and cash-flow issues for what are larger scale and more complex sites with greater abnormal costs.

Require developers of large scale sites to enter into a PPA to demonstrate commitment to delivery and progress through planning within a specified timescale (Planning Performance Agreement).

Require developers/landowners of large sites to demonstrate that an appropriate consortium agreement is in place prior to allocation/planning permission or make this a PPA condition if applicable.

Break down large sites into smaller component parts/phases with logical access and broadly equivalent infrastructure costs so that these become attractive to housebuilders to take through planning.

Use CPO powers to acquire land required for delivery of challenging but much needed sites via in-house development team – eg in Kings Lynn & West Norfolk they have a self-financing but not for profit delivery vehicle in house that helps push forward challenging sites alongside strategic infrastructure.

Condition discharge, and delivering s106 obligations take longer than planned and timing of ecology/environmental mitigation. Planning permission often comes with stipulated requirements and conditions, which may themselves lead to further delay. Conditions that have been agreed are renegotiated at reserved matters stage causing delays. This uncertainty can delay funding and financing;

For large sites, site-wide pre-commencement conditions are typically the most onerous to implement and have most cost and viability impact. An extensive list of these can be off-putting for developers to get started on delivering homes. Where possible the number of these conditions should be minimised and triggers should be prior to occupation or linked to phasing as developers can start building and selling houses so cash flow occurs.

Conditions are often imposed in response to objections to make the development acceptable. Enable early stage engagement with key stakeholders and seek to flesh out environmental issues at an early stage, so mitigation can be designed into the scheme and dealt with in the application rather than retro-fitted by condition.

A phasing strategy condition can be used to set out what items are delivered with each parcel to pass on to the reserved matters stage. Geographic phasing is often more logical and flexible for large sites than arbitrary trigger points based on housing numbers overall (albeit within a geographic phase it may be helpful to specify unit-based triggers). This could be supported by a monitor and manage arrangement with additional failsafe mitigation options once delivery commences, so that appropriate interventions are put in place as they are required.

11.2 THE FOLLOWING STEPS ARE RECOMMENDED FOR IMPROVING THE DELIVERY OF STRATEGIC SITES:

- (1) A balanced range of allocated sites and scales of development are required to enable growth targets to be met more rapidly and to stimulate interest from commercial housing developers. For some authorities reducing reliance on very large strategic housing sites in Local plan policies may be preferable, to help facilitate competition and attract more housebuilders to the area.**
- (2) Enable early stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage. Albeit a fair and equitable approach is required.**
- (3) Support and encourage allocation and development of retirement developments, bungalows, lifetime homes and extra care facilities for independent elderly living in suitable environments to help address the aging population and free up existing housing stock.**
- (4) Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites in excess of 300 units to enable realistic determination timescales to be agreed and act in the best interests of the developer and LPA.**
- (5) Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff should have appropriate experience in the delivery of large scale development and may be a shared resource between neighbouring authorities. PPA fees or pre-application charges may be used to pay for resourcing of such roles.**
- (6) Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions. Engage with such third parties more proactively at the allocation stage, seeking to reduce development risk.**
- (7) Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes for delivery.**
- (8) Facilitate the creation of a county-wide developer forum by providing meeting venues and opportunity for an audience with higher profile council members and leaders. This should help to improve LPA awareness of commercial issues affecting delivery of strategic sites.**
- (9) Consider whether statutory powers can be used to assist with unlocking difficult sites, especially where additional third party land take is required to support strategic infrastructure delivery.**

- (10) Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL. For example a loan is obtained by NCC to pay for major infrastructure at the early stages of development and this is repaid by the developer using revenue from early stage housing delivery via a payback mechanism. This would help to secure delivery of housing along with supporting infrastructure.**
- (11) Consider the viability effects and delivery risks of site-wide pre-commencement conditions. Where possible, the number of these conditions should be minimised and triggers should be 'prior to occupation' or linked to geographic phasing as developers can start building and selling houses so that cash flow occurs. Identify a monitor and manage strategy for mitigation once development has commenced.**

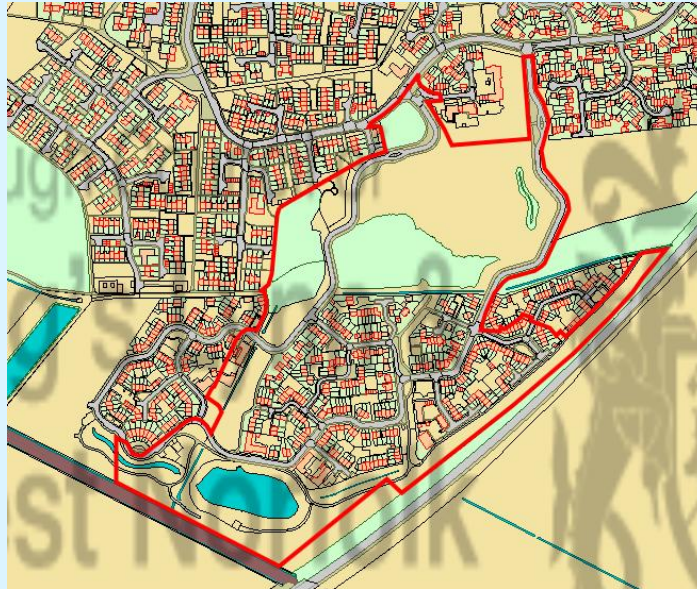
APPENDIX

A SITE LIST

Overview of Deep Dive Sites in Norfolk

No 1 – King's Reach, South Fairstead

Site Plan:



Site Details:

The proposal was for a residential development including associated infrastructure, open space and a storm water reservoir. In total 395 units were developed in 3 phases which are all complete and built out.

Site History:

The site was allocated in the 1998 Local Plan (Policy 5/33: provision for 22.9ha of housing land in Lynn East, South Fairstead).

After OP permission was granted, an application was made (06/01397/F) for a 3 year extension for submission of reserved matters and implementation. Permission was granted with 22 conditions (for more details on these conditions view [Decision Notice](#)).

During Phase 3, complaints were raised about the breach of conditions 4 and 5 regarding hard and soft landscaping as attached to the RM application (07/01620/RMM). The breach was remedied following informal action.

In 2016 an application for a non-material amendment (06/01397/NMA_1) to improve the sustainability of the landscape scheme was made and granted.

Timeline:

Phase 1 – 2/99/1367/O; 2/01/1515/D; 04/02708/RM

à OP application submitted Oct 1999; permitted Sep 2001 (23 conditions; for more detail view [Decision Notice](#))

à RM application submitted Dec 2004; permitted Mar 2005

à 50 units

Phase 2 – 06/02139/RMM; 10/00829/F

à RMM application submitted Oct 2006; permitted Mar 2007

à 195 units (original application for 188 units comprising 131 private & 57 affordable units)

Phase 3 – 07/01620/RMM

à RMM application submitted Aug 2007; permitted Nov 2007

à 150 units

Local Authority: King's Lynn and West Norfolk

Developer or Owner: Taylor Wimpey; Taylor Woodrow Developments Ltd.

(Planning) Consultant or Promoter: Kings Lynn & West Norfolk

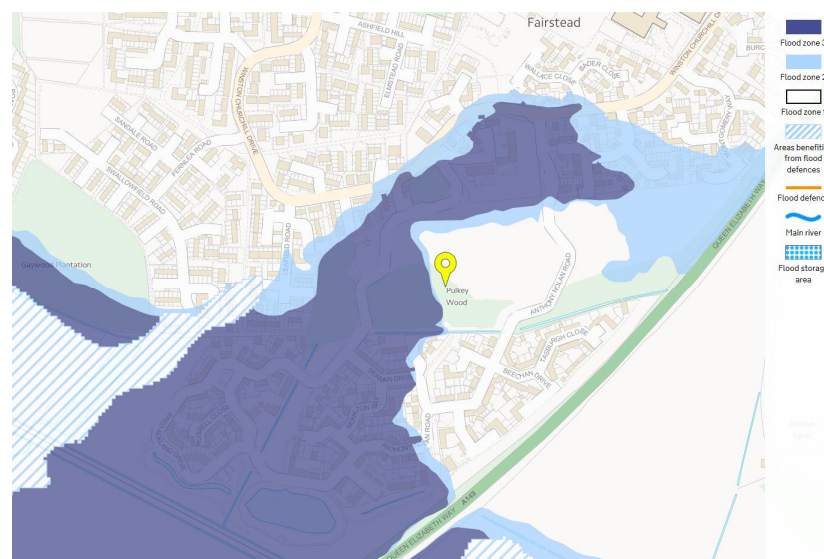
Site Specific Requirements: Unknown

Perceived Issues: à Strategic Drainage & Flood Risk

Source Documents: [Planning Applications and Decision Notices](#)

Parts of the site are within flood zones 2 and 3.

Additional Comments:



No 2 - South Fairstead, King's Lynn

Site Plan: Unknown

Site Details: Site of unknown size allocated for 196 dwellings within the 1998 Local Plan.

Site History: Allocated in the 1998 Local Plan (Policy 5/33 Lynn East, South Fairstead – Housing).
No Longer allocated but within the development boundary so potentially could come forward.

Timeline: Unknown

Local Authority: King's Lynn and West Norfolk

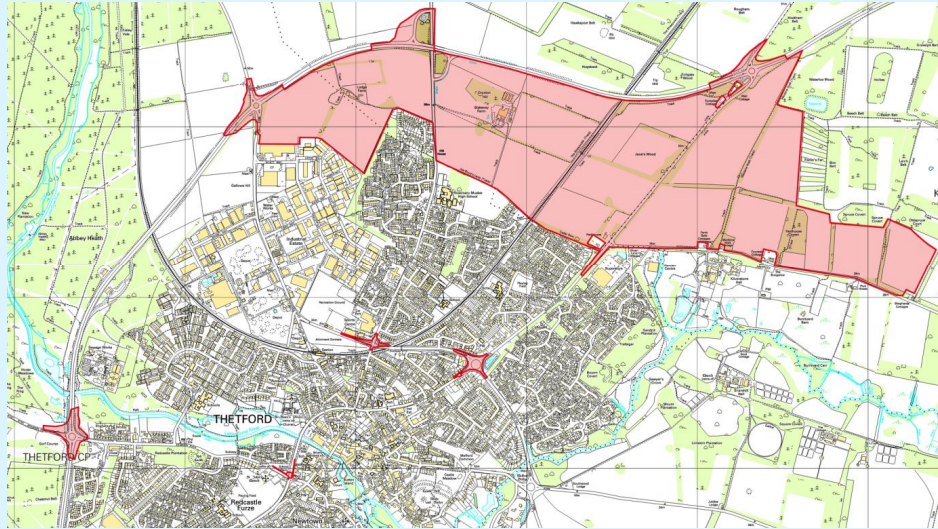
Developer or Owner: King's Lynn and West Norfolk

Perceived Issues:
 → Large S106 requirement for public transport link over a railway line bridge or tunnel;
 → Site Viability;
 → Desirability/Market Ability; and
 → Reservoir within the site.

Source Documents: 1998 West Norfolk Local Plan

No 3 - Thetford Sustainable Urban Extension

Site Plan:



Site Details:

5,000 dwellings, 22.5ha of employment land, local centres, 3 primary schools, green infrastructure, playing fields, amenity areas and means of access.

The application includes a number of secondary sites (not all included in the above image).

Site History:

Site allocated within the Core Strategy (2009) and Thetford Area Action Plan DPDs (2012).

Planning application submitted July 2011 and determined in November 2015. (3PL/2011/0805/O). The site received outline permission for 5,000 dwellings. Case officer – Gary Hancox. [Planning Portal Link](#)

There are ongoing discussions regarding detailed planning applications with and initial detailed application expected Spring 2017. There are 53 conditions attached to the outline permission.

Timeline:

- à Allocated – December 2009
- à Planning application (outline) submission – July 2011
- à Decision notice (reserved matters) – November 2015 (outline permission expires in 5 years unless detailed application for the first sub-phase is received)
- à Planning application (detailed) submission – Expected Spring 2017
- à Section 106/CIL - Unknown

Local Authority: Breckland

Developer or Owner: Kilverstone Estate / Crown Estate

(Planning)
Consultant or
Promoter: Pigeon (Promoter) / Carter Jonas / Savills

Site Specific
Requirements: à Major infrastructure; and
à Other requirements unknown as the site is not allocated within an adopted local plan.

Perceived
Issues: à Market conditions

Source
Documents: [Breckland Core Strategy](#)
[Application documents](#)

Additional
Comments: Extensive list of 53 conditions attached to this application.

No 4 – Land at London Road, Attleborough

Site Plan:



The site is located on the western edge of Attleborough between London Road and the A11 Attleborough bypass. It is currently in agricultural use. The surrounding areas are predominately residential.

Application was made for 375 dwellings (including 25% affordable housing) with associated parking, garages, landscaping and for employment development.

Site Details:

The entire development would measure approximately 18.6ha in area. The residential development would occupy 10.6ha, employment land 3.9ha, open space 2.4ha and allotments 1ha. The employment land would provide up to 12,000sqm of floorspace for use classes B1 (light industrial/offices) and B8 (warehousing/distribution).

The development is currently under construction.

Site History:

The planning application was made in Sep 2012 and granted in Dec 2012, subject to 34 conditions (for more detail, see [Decision Notice](#)).

The proposal was a resubmission after refusal of a similar proposal made in July 2012. The previous application was refused on policy and highway safety grounds.

The new application in Dec 2012 differed from the July 2012 application in the following respects: no 2.5 storey properties on London Road, B1 office space limited to 9,600sqm.

Timeline:

- 3PL/2012/0958/H:
- Application submitted: Sep 2012
 - Granted permission: Dec 2012
 - S106 Agreement signed: Dec 2012
 - Start of development: March 2014

Local Authority: Breckland

Developer or Owner: Taylor Wimpey UK Ltd.

(Planning) Consultant or Promoter: Unknown

Site Specific Requirements: Flood Risk Assessment addressing the surface water drainage strategy (see [FRA](#)).

Perceived Issues:

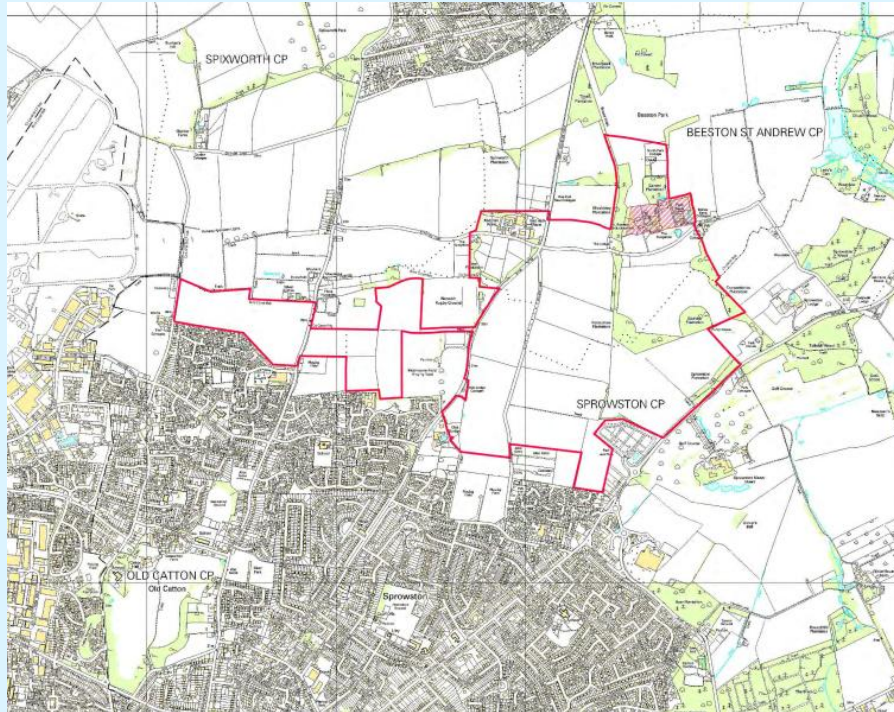
Key issues raised by the Planning Committee (see [Planning Committee Report](#)):

- à Planning Policy: site is outside settlement boundary and not included in ASHAAP allocation.
- à Transport: Norfolk County Council Highways insists on package of mitigation measures including the narrowing of London Road, provision of pedestrian crossing facilities, 30mph speed limits etc.
- à Viability of Development
- à Local Character
- à Residential Amenity
- à Drainage: site lies in Flood Zone 1 and is greater than 1ha; it requires surface water drainage strategy

Source Documents: [Planning Application Documents and Decision Notices/Reports](#)

No 5 - Land to the North of Sprowston and Old Catton, between Wrotham Road and St. Faith's Road

Site Plan:



207.4ha site for the provision 3,520 dwellings to the north of Norwich. This is a greenfield site that will function of an urban extension of Norwich. The site falls within the Growth Triangle Area Action Plan.

Site Details:

The development is to include 16,800 sqm of employment space, up to 8,800sqm for retails/services/cafes etc., 1,000 sqm of hotel accommodation, two primary schools, up to 2,000 sqm of community space including a health centre, library and more, and sustainable drainage.

An outline planning application was put forward for this site which was granted by Broadland District Council. However the phasing of the site would result in significant upfront infrastructure costs.

A second application was therefore put forward to vary conditions of the previous application. This applies to change the phasing to minimise initial infrastructure prior the completion of housing. This was done by bringing forward the western phase.

Site History:

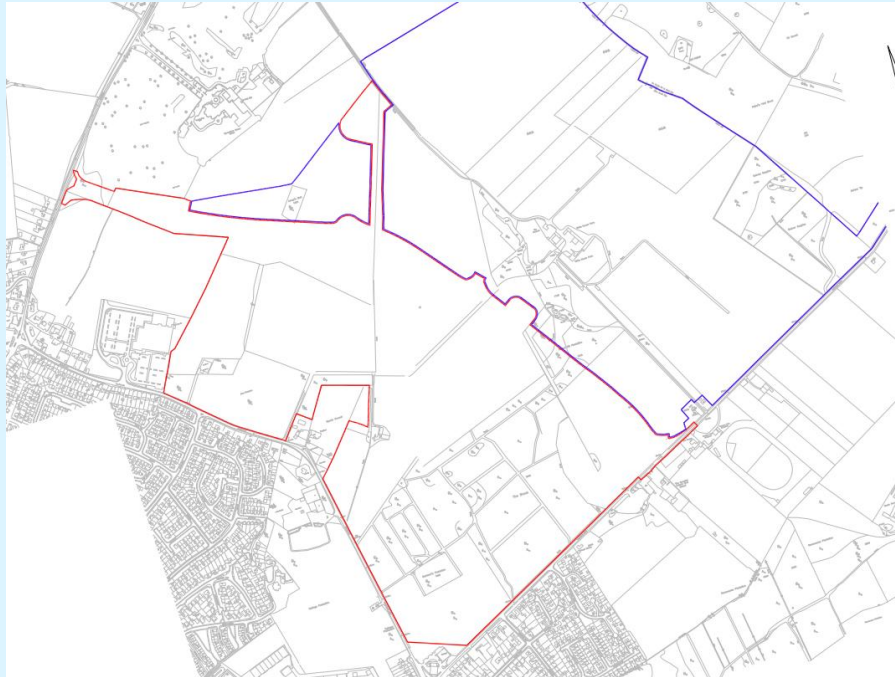
Negotiations are ongoing with different developers and land promoters in regard to NCC design and build using a LIF loan (agreed in principle) to enable construction of the link road. This link road would support the delivery of associated schemes at Norwich RFU and Land East of Buxton Road.

NCC and BDC are in negotiations with TOWN about redirecting LIF loan for original phase of 20121516 to enable construction of link road and thus deliver the required link road scheme for the first phase of 20161058, enable further subdivision of land parcels, increasing range of potential developers and hastening delivery of homes.

	The site is listed in the Growth Triangle Area Action Plan which was formally adopted in July 2016.
Timeline:	<ul style="list-style-type: none"> à Planning application (outline) submission for 20121516 – October 2012 à Resolve to grant outline permission – September 2013 à Decision notice (reserved matters) – February 2016 (outline permission expires in 3 years unless detailed application for the first sub-phase is received) à Section 106 agreement – February 2016 à Planning application (outline) submission for 20161058 – June 2016 à Resolve to grant outline permission – October 2016 à Allocated in Growth Triangle Area Action Plan (part of the adopted Local Plan) – July 2016 (previously included in draft documents)
Local Authority:	Broadland
Developer or Owner:	Beyond Green Development Ltd / Beyond Green Developments (Broadland) Ltd
(Planning) Consultant or Promoter:	Strutt and Parker LLP
Site Specific Requirements:	<ul style="list-style-type: none"> à Link road
Perceived Issues:	<ul style="list-style-type: none"> à Section 106 negotiation took a long time due to delay associated with securing agreement from all landowners rather than disputes over S106 clauses; à Funding of upfront infrastructure delivery. Second application aims to address this by amending the phasing; à Disposal of development parcels to developers; and à Ensuring cooperation between different development interests.
Source Documents:	"\\uk.wspgroup.com\central_data\Projects\700334xx\70033456 - NSF Study\02 WIP\TC Town and Country planning\03 Document\Incoming\Broadland\Land to the North of Sprowston"

No 6 - Blue Boar Lane: White House Farm

Site Plan:



Site Details:

This development (84.2ha) includes outline permission for up to 1,223 dwellings, a link road, recreation areas, a primary school, open space and associated works. It will form part of an urban extension of Norwich and is adjacent to Land to the North of Sprowston and Old Catton above.

The development is under construction and adjacent sites have been allocated for additional development through the Growth Triangle Area Action Plan (June 2016). 460 units allocated on continuity site.

Site History:

An outline planning application was put forward for 1,223 homes to the north east of Norwich in 2008. A long section 106 agreement negotiation delayed the decision notice, it is understood that affordable housing was the cause of delay. Economic conditions at the time of application also resulted in delay as under the promotion agreement at the time, bringing forth the development would have been disadvantageous to all parties.

These delays resulted in the submission of a reserved matters application due to renegotiation between developer and land owner.

The scheme is now underway and has shown initial strong delivery.

In addition to 1,223 at this site, 460 dwellings at an adjacent site (GT20) which is covered by the same promotional/option agreement was secured once the Growth Triangle Area Action Plan was adopted in June 2016. A 1,226 dwelling site to the north, also covered by the same promotional/option agreement, is currently being promoted through the Greater Norwich Local Plan.

Timeline:

- Allocation in Broadland Local Plan – May 2006 (Saved policy SPR6)
- Planning application (outline) submission for **20080367** – March 2008
- Resolve to grant outline permission – August 2008

à Decision notice (reserved matters) – May 2011 (outline permission expires in 2 years unless detailed application for the first sub-phase is received)

à Section 106 agreement – May 2011

Phase 1a Part 1 (Taylor Wimpey – 115 units)

à Planning application (reserved matters) submission for **20130209** – February 2013

à Decision notice – May 2013

Phase 1a Part 2 (White House Farm Dev Consortium – 54 units)

à Planning application (reserved matters) submission for **20130224** – February 2013

à Decision notice – May 2013

Parcels P1 & P2 (Persimmon Homes – 140 units)

à Planning application (reserved matters) submission for **20130696** – May 2013

à Decision notice – August 2013

Parcels HH1 & HH2 (Hopkins Homes Ltd – 139 units)

à Planning application (reserved matters) submission for **20130699** – May 2013

à Decision notice – August 2013

Allocation

à Allocated in Growth Triangle Area Action Plan (part of the adopted Local Plan) – July 2016 (previously included in draft documents)

Local Authority: Broadland

Developer or Owner: Persimmon Homes / Hopkins Homes / Taylor Wimpey

(Planning) Consultant or Promoter: Bidwells

Site Specific Requirements: à Link Road; and
à Ecological survey of site and ponds within 500m of site to ensure protected species are not harmed.

Perceived Issues: à Affordable housing / section 106
à Market conditions

Source Documents: ["\\uk.wspgroup.com\central_data\Projects\700334xx\70033456 - NSF Study\02 WIP\TC Town and Country planning\03 Document\Incoming\Broadland\Blue Boar Lane White House Farm"](\\uk.wspgroup.com\central_data\Projects\700334xx\70033456 - NSF Study\02 WIP\TC Town and Country planning\03 Document\Incoming\Broadland\Blue Boar Lane White House Farm)

No 7 - Great Yarmouth Waterfront

Site Plan:



The aim of this project is to regenerate the Great Yarmouth Waterfront and transform it into a vibrant urban quarter. The 40ha site spans both sides of the River Yare and is centrally located with access to the railway station.

Site Details:

The regeneration should include provision for 1,000 new dwellings, 16,500sqm of employment floorspace and 14,200sqm for retail and leisure. This is a long term heritage-led regeneration project to address social exclusion and high levels of deprivation and unemployment.

Site History:

The Great Yarmouth Waterfront has been marked for regeneration and development since 2007 when the first Area Action Plan was drafted. The proposal has changes and the boundary altered but has now been adopted. The original large boundary was reduced in size for the following reasons:

- à focus delivery on a small number of priority sites due to challenging economic environment;
- à resistance to the scale of port land redevelopment ;
- à Completion of the first phase of Eastport UK (Great Yarmouth's Outer Harbour) was undertaken;
- à preferred route for the Third River Crossing had been identified ; and

à inclusion of The Conge would help to promote better connectivity between the railway station, riverside and the market place in the town centre.

There are many difficulties associated with bringing this site forward, largely due to numerous individual land owners and thus no planning applications have been made for this site.

Timeline:

- à Great Yarmouth Waterfront Area Action Plan – 2007
- à Great Yarmouth Waterfront Area Action Plan – 2010
- à Allocation in Great Yarmouth Local Plan: Core Strategy 2013-2030 – December 2015 (Policy CS17)
- à Supplementary Planning Document to come

Local Authority: Great Yarmouth Borough Council

Developer or Owner: Unknown

(Planning) Consultant or Promoter: Unknown

Site Specific Requirements:

- à Heritage led regeneration;
- à Flood risk assessment;
- à Safeguard port operation land as employment land to serve offshore energy related business for 2013-2025;
- à Maximise the on-site provision of affordable housing via a site-specific viability assessment; and
- à Improve links between the railway station and the market place/town centre.

Perceived Issues:

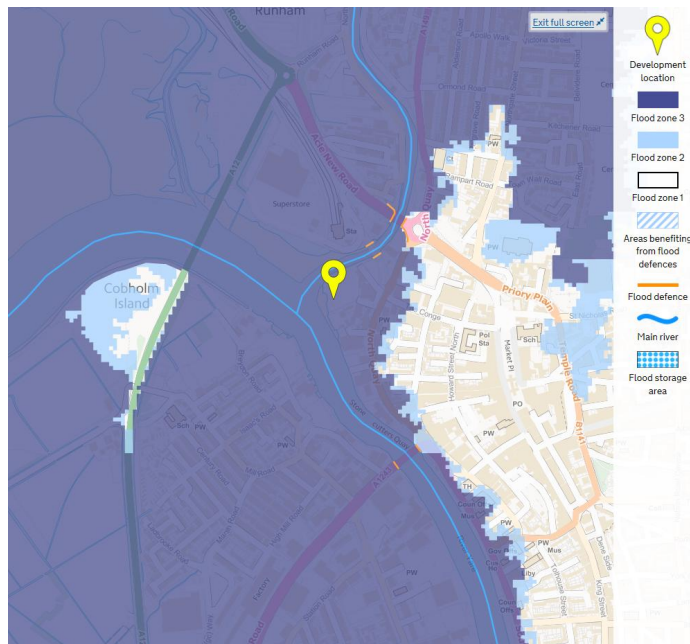
- à Global economic downturn;
- à Resistance to the scale of the port land redevelopment;
- à Significant flood risk; and
- à Multiple ownerships.

Source Documents: \\uk.wspgroup.com\central_data\Projects\700334xx\70033456 - NSF Study\02 WIP\TC Town and Country planning\03 Document\Incoming\Great Yarmouth\Great Yarmouth Waterfront

Additional Comments:

Unlike other sites with multiple ownership there does not appear to benefit from a single land promoter for this area.

The flood risk in the area makes for difficult development.

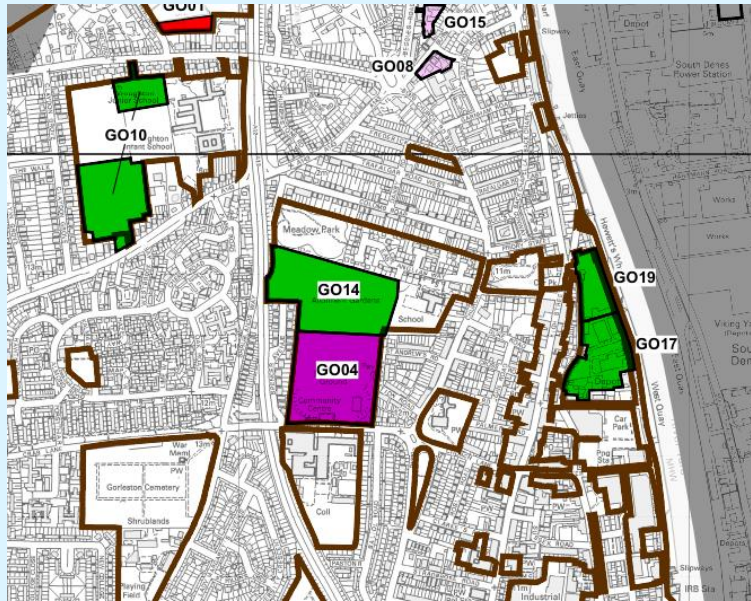


Policy CS17 of the 2015 Core Strategy states that the waterfront is to be developed for 1,000 new dwellings, of which 300 are anticipated to be delivered by 2030. This document states a Great Yarmouth SPD is due in 2017. Applications have been refused as they don't meet the criteria of CS17.

However the 2014 SHLAA has identified the site (GR05b, GR6, GR26) for 421 dwellings and states there are significant flood risks and flood defences will be necessary. The land is also potentially contaminated.

No 8 - East Anglian Way, Great Yarmouth

Site Plan:



Site Details: A 3.92ha site for 100 dwelling site within Great Yarmouth

Site History: Listed in the 2014 SHLAA (GO14) as 'East Anglian Way'. It's suggested for 117 dwellings in the SHLAA.

Timeline:

- à Allocated 2001 in the Borough-Wide Local Plan
- à Listed in 2014 SHLAA

Local Authority: Great Yarmouth Borough Council

Developer or Owner: Badger Builders (prospective)

(Planning) Consultant or Promoter: Unknown

Site Specific Requirements: Unknown

Perceived Issues:

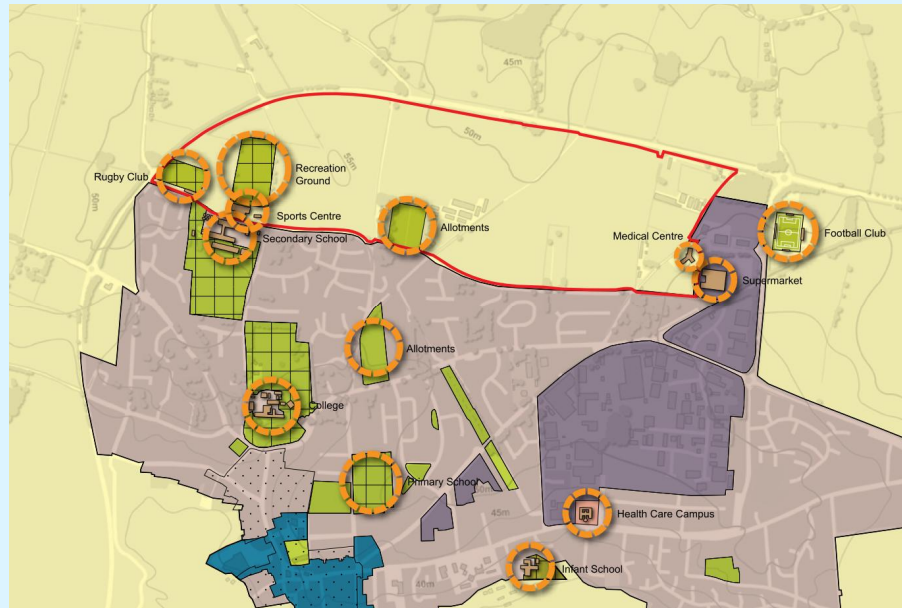
- à Site access – NCC have implied the site is not accessible and no further development should take place from East Anglian Way; and
- à May only be deliverable in conjunction with adjacent site GO04.

Source Documents:	Unknown
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Additional Comments:	Council owned land
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No 9 - Northern expansion of Fakenham

Site Plan:



Site Details:

The site lies north of Fakenham with the A148 to the north and west, Rudham Stile Lane to the south and Thorpland Road to the east.

The Site Allocation Development Plan proposes mixed use urban expansion north of Fakenham. Approximately 85h of development land of which majority (approximately 59ha) is in ownership of Trinity College Cambridge.

The Development Framework Schedule proposes ~27ha of residential developments (~ 900 units; 84 units at Brick Kiln Farm), ~8ha employment land, community facilities, public parks and natural green space.

Site History:

A 'Master Plan' for the development was produced by the main landowner (Trinity College, Cambridge) in 2009 and submitted as evidence base to support allocation of the site through the Local Development Framework process.

A draft Development Brief was published for public consultation in March 2012. The brief was not approved and the following further considerations were asked for:

- à Traffic circulation impacts on the existing highway network; and
- à Strategy for green infrastructure.

A revised Brief was submitted to the Council in late 2014. Following consultation, changes were proposed and the [Final Development Brief](#) approved in 2015.

Timeline:

- à Pre-Application Masterplan – 2009
- à Allocation in North Norfolk Core Strategy and Site Allocations Development Plan – 2011
- à Development Brief submission – 2012 (Draft), 2014 (Final);
- à Approval of Final Development Brief – March 2015

Local Authority: North Norfolk

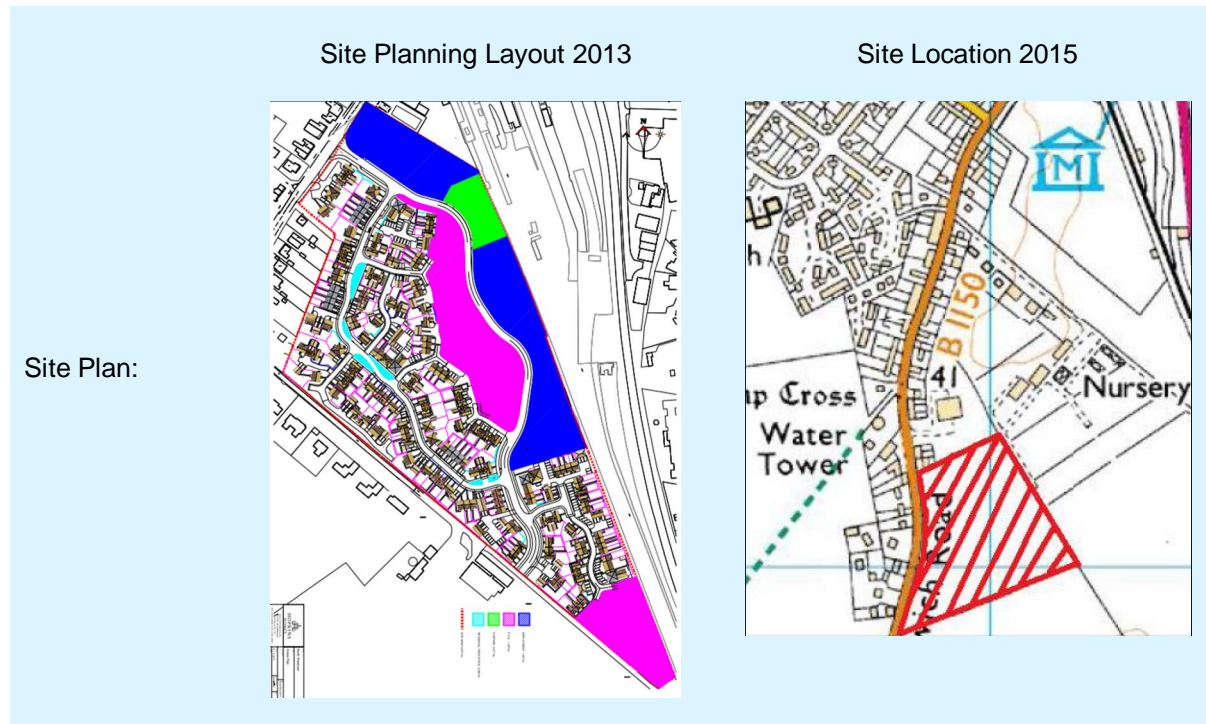
Site Specific
Requirements: Development Brief

Perceived
Issues:

- à Landowner appears slow to promote (Trinity College have better sites);
- à Plurality of landowners but one overall authority needed to deal with entire project;
- à Upfront cost of supporting infrastructure; existing roads etc. insufficient; and
- à Poor market conditions and number of potential developers unknown.

Source
Documents: [Final Development Brief and Planning Policy & Built Heritage Working Party meeting minutes.](#)

No 10 - Former HL Food Site and adjacent land, North Walsham



Site Plan:

Site Details:

A 24.5ha site allocated for 400-500 dwellings. Both sites are located east of Norwich Road in North Walsham and are allocated for mixed use development. The 2013 site is a former HL Foods factory site southwest of North Walsham railway station. The 2015 site lies further south along Norwich Road.

Site History:

Part of the site was originally an agricultural field but has been allocated for mixed use development (allocation NW01).

2013 application for 176 dwellings with access, open space and associated works and formation of station car park and outline application for employment development. Around 40 units completed.

2015 Hybrid Proposal submitted by Persimmon Homes Ltd for full planning permission for erection of 100 dwellings and outline planning permission for 0.89 ha of commercial space.

Timeline:

- à Allocation in Site Specific Allocations Development Plan – February 2011
- 13/0866 – 176 Units (Hopkins Homes)
- à Planning application (outline) submission for **13/0866** – July 2013
- à Decision notice (reserved matters) – August 2014 (outline permission expires in 5 years unless detailed application for the first sub-phase is received)
- à Section 106 agreement – August 2014
- à Commencement – Early 2015 (40 units no complete)
- 15/1010 – 100 Unites (Persimmon Homes)
- à Planning application (outline) submission for **15/1010** – July 2015
- à EIA Screening – July 2015

- à Decision notice (reserved matters) – December 2016 (outline permission expires in 3 years unless detailed application for the first sub-phase is received)
- à Section 106 agreement – December 2016

Local Authority: North Norfolk District Council

Developer or Owner: Persimmon Homes / Hopkins Homes

(Planning) Consultant or Promoter: Strutt and Parker

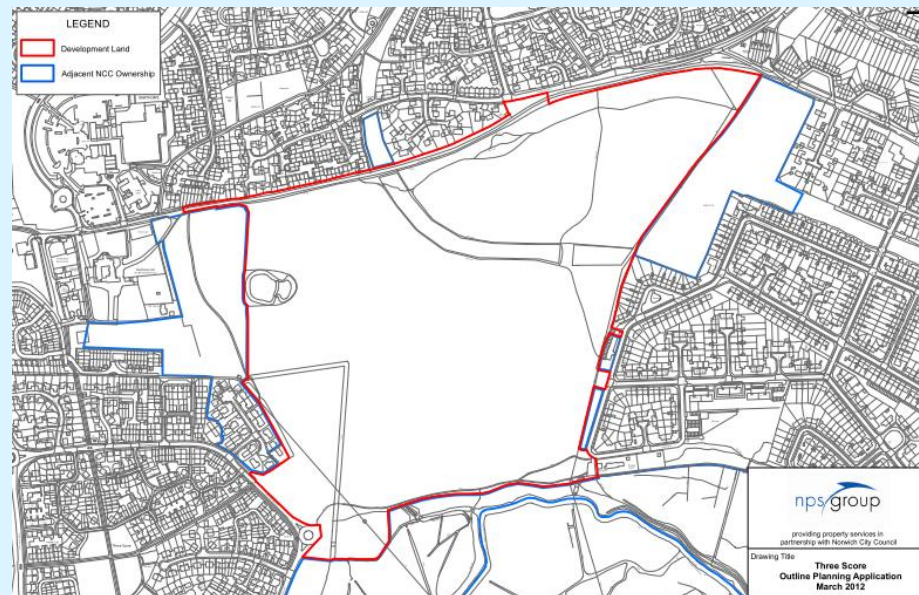
Site Specific Requirements: à Rural Residential Conversion Area (HO9) Rural Residential Conversion Area (HO9) (The site lies within an area where the re-use of an existing good quality building as a dwelling may be permitted).

Perceived Issues: à Lack of affordable housing provision as developer viewed this as unviable;
à Multiple ownerships;
à No single promoter; and
à Poor market conditions.

Source Documents: [North Walsham Planning Applications & Decision Notices & S106](#)

No 11 - Three Score, Bowthorpe

Site Plan:



The site, a greenfield development in Council ownership, lies south of Clover Hill. To the northwest lie Bowthorpe Main Centre and the Health Centre; in the south runs the River Yare. The site currently forms a greenfield pocket in an otherwise built up area. It lies approximately 5km west of Norwich.

Site Details:

Original OP application for up to 1000 homes, including affordable housing, care home, a new village center including at least one local shop, public open space and associated roads and infrastructure.

Reserved matters application for erection of a care village comprising 80 apartments for dementia care and 92 flats with care schemes.

Site History:

First allocated for residential development in 2004 – applications brought forward and were linked to a deal with Persimmon. However in light of a change in market circumstances in 2008 Persimmon withdrew from the deal and planning permission was never released.

Norwich City Council then sought to bring the site forward for development itself working through a strategic partnership with the HCA. First phase (care home and sheltered flats) now completed – subsequent phases proceeding.

Timeline:

- à Allocation in Local Plan (HOU8) – 2004
- à Planning application (outline) submission for **12/00703/O** – March 2012
- à EIA Statement – April 2012
- à Decision notice (reserved matters) – July 2013
- à Section 106 agreement – July 2013
- à Allocation in Local Plan (R38) – December 2014
- à Planning application (reserve matters) submission for **13/02031/RM** – December 2013
- à Decision notice – March 2014

Local Authority: Norwich City

Developer or Owner: Norwich City

(Planning) Consultant or Promoter: Mouchel (environmental)

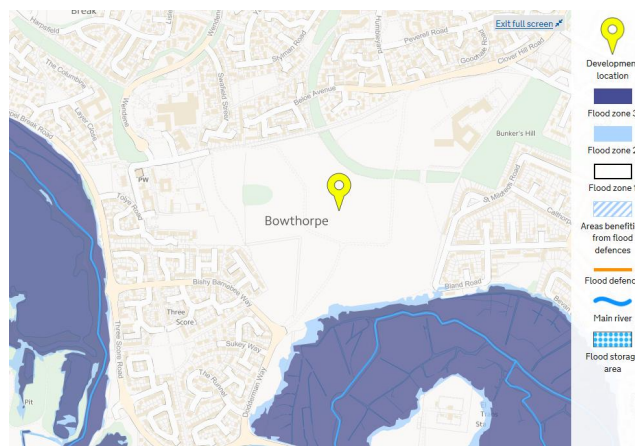
Site Specific Requirements: à All works to be done in accordance with Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement

Perceived Issues: à Public concerns expressed regarding loss of green space and potential impact on biodiversity.
à Small area of land along southern site boundary lies within designated flood plain of the River Yare. Development in this area is within Flood Zone 2 and restricted to surface water attenuation and ponds.
à 2008 economic downturn (market issues)

Source Documents: [Three Score Planning Applications & Decision Notices and other](#)

Although the southern site boundary touches on Flood Zones 2 and 3, most of the development land is not at risk of flooding.

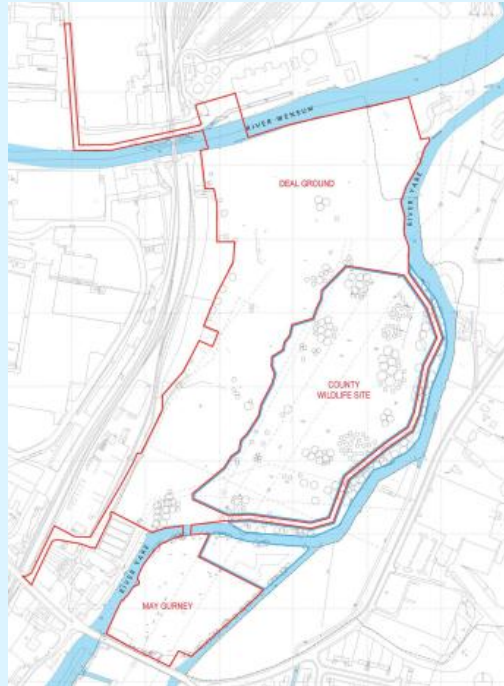
Additional Comments:



The 47 conditions can be read [here](#)

No 12 - Deal Ground

Site Plan:



Site Details:

The site allocated for 550 dwellings is located in the southeast of Norwich bordering the River Yare in the south and the east. The River Wensum runs along the northern and the railway line along the western site boundary. The county wildlife site in the east is a priority habitat site.

First outline planning application for a mixed development consisted of a maximum of 670 dwellings; a local centre comprising commercial uses; demolition of buildings on the May Gurney site (excluding the former public house); an access bridge over the River Yare; new access road; car parking; flood risk management measures; landscape measures inc earthworks to form new swales and other biodiversity enhancements including the re-use of the Grade II Listed brick Kiln for use by bats.

Further outline planning application for a pedestrian, cycle and emergency access bridge over the River Wensum.

Site History:

Complicated urban brownfield site involving 3 administrative areas (mostly Norwich City Council but parts in South Norfolk with access across river in Broads Authority area).

Essentially single ownership (Serrys Property Company) but with access agreement in place with landowners to the north to provide access.

Policy guidance note agreed led to planning application being submitted in advance of Local Plan adoption, (viability suggested low level of affordable housing to be required) consent issued prior to CIL coming into force with a long date for implementation (10 year consent). Site subsequently marketed but no apparent interest.

Now a joint venture is being formed to take forward the redevelopment of the site but the intention for the Deal Ground is to build out a different scheme on which pre-application discussions are due to start in the new year.

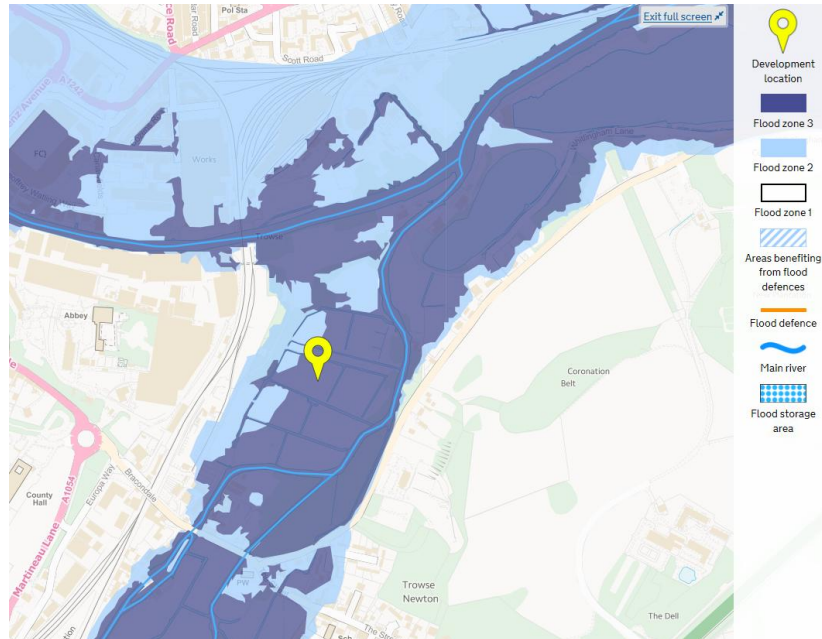
- Timeline:
- à Allocation in Local Plan – 2004
 - à Allocation in Local Plan – December 2014
 - 12/00875/O – 670 Units
 - à Planning application (outline) submission for **12/00875/O** – March 2012
 - à Decision notice (reserved matters) – July 2013 (outline permission expires in 10 years unless detailed application for the first sub-phase is received)
 - à Section 106 agreement – July 2016
 - 12/00996/O - Bridge
 - à Planning application (outline) submission for **12/00996/O** – December 2011
 - à Decision notice (reserved matters) – October 2013 (outline permission expires in 2 years unless detailed application for the first sub-phase is received)
 - 14/01219/D – Deed of access
 - à Planning application (access and infrastructure deed) submission for **14/01219/D** – August 2014
 - à Decision notice – November 2014 (outline permission expires in 2 years unless detailed application for the first sub-phase is received)

Local Authority: Norwich City Council

Developer or Owner: Serruys Property Company Ltd

(Planning) Consultant or Promoter: Landpro Services / Savills/ Erebus Ventures

Site Specific Requirements: Flood Risk Assessment - The site is located within Flood Zones 2 and 3.



Perceived
Issues:

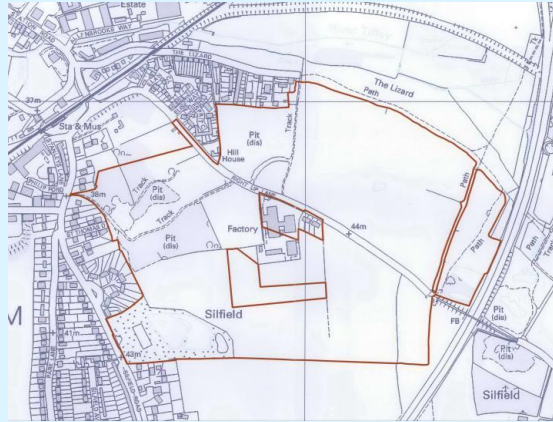
- à Includes county wildlife site (priority habitat inventory)
- à Flood risk

Source
Documents:

[Deal Ground Planning Applications & Decision Notices](#)

No 13 - South Wymondham

Site Plan:



The site is located in the southeast of Wymondham with the railway in the northwest and the A11 Wymondham Bypass running southeast of the development area. It is allocated for 1,230 dwellings and totals 67ha.

Two linked sites to be planned as one, allocated in the Wymondham Area Action Plan.

Site Details:

Land North Of The A11 At Park Farm Silfield Road [Pelham]: Proposed development to include up to 500 dwellings, Community facilities, site infrastructure including new access roads, public rights of way and drainage, green infrastructure including public open spaces and structural landscape planting.

Land To The East And West Of Rightup Lane [Endurance]: Mixed use development of up to 730 dwellings, up to 128 bed care home / homes (in one or two buildings), up to 250 square meters of retail / commercial floor space, a new primary school together with all other associated temporary and permanent infrastructure and green infrastructure, including new access arrangements, sports pitches, allotments and community orchard.

Site History:

Sites received resolution to grant planning permission on 18 June 2013 subject to S106 agreement.

Reserved matters application for development of 153 dwellings submitted 13 Oct 2015 and granted 06 May 2016.

Timeline:

à Allocation in Wymondham Area Action Plan WYM3 (Local Plan) – October 2015

Pelham

2011/050/O – 500 Units

à Planning application (outline) submission for **2011/0505/O** – March 2011

à Environmental Statement – December 2011

à Decision notice (reserved matters) – February 2014 (outline permission expires in 3 years unless detailed application for the first sub-phase is received)

à Section 106 agreement – February 2014

2015/1280/D – 10 Units + Site Infrastructure

à Planning application (reserved matters) submission for **2015/1280/D** – June 2015

à Decision notice – December 2015

2015/1649/D (Taylor Wimpey) – 159 Units

à Planning application (reserved matters) submission for **2015/1649/D** – July 2015

à Decision notice – December 2015

2015/1760/D – 90 Units

à Planning application (reserved matters) submission for **2015/1760/D** – July 2015

à Decision notice – January 2016

2015/2380/D (Bovis) – 150 Units

à Planning application (reserved matters) submission for **2015/2380/D** – October 2015

à Decision notice – April 2016

Endurance

2012/0371/O – 750 Units

à Planning application (outline) submission for **2012/0371/O** – February 2012

à Environmental Impact Assessment – February 2012

à Decision notice (reserved matters) – February 2014 (outline permission expires in 3 years unless detailed application for the first sub-phase is received). Granted permission for 730 units.

2015/2168/D (Hopkins Homes) – 153 Units + Infrastructure

à Planning application (reserved matters) submission for **2015/2168/D** – September 2015

à Decision notice – May 2016

Local Authority: South Norfolk

Developer or Owner: Pelham Holdings Ltd / Endurance Estate Strategic Land / Hopkins Homes ' Taylor Wimpey / Bovis Homes Ltd

(Planning) Consultant or Promoter: Boyer Planning / Terence O'Rourke / Grafik Architecture Ltd

Site Specific Requirements:

- à Extensive list of contributions outlined in local plan;
- à Extensive areas of open space including play areas;
- à Heritage statement;
- à Historic Environment Record investigation;
- à Ecological assessment; and
- à New primary school and secondary school expansion provision.

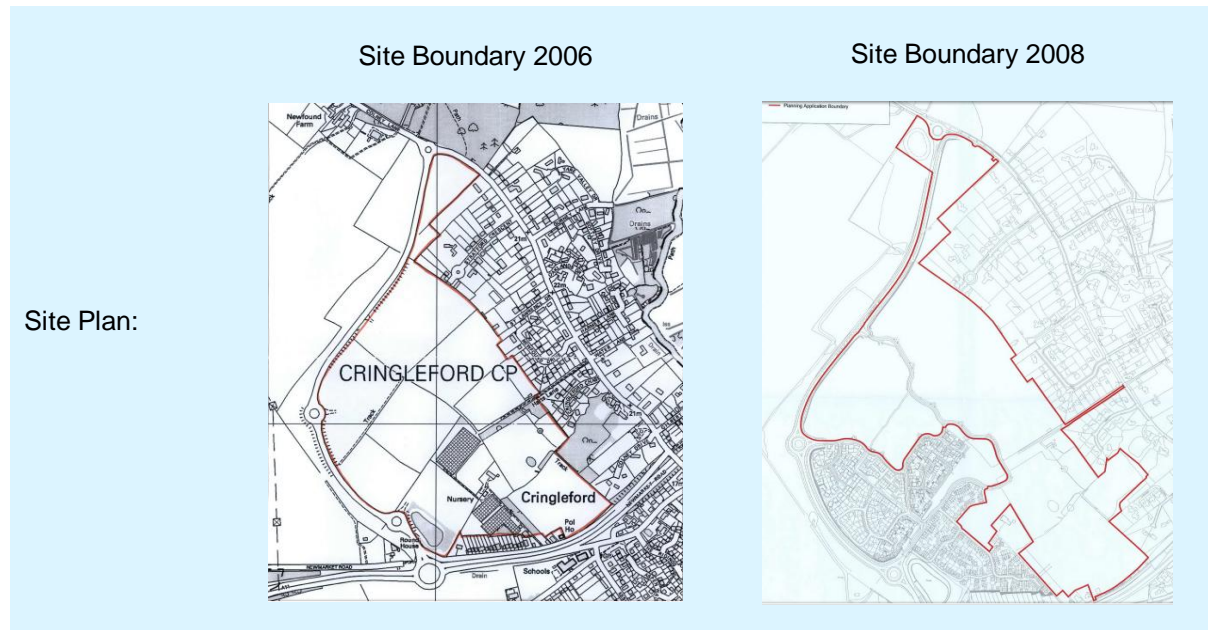
Perceived
Issues:

- à The railway bridge was a major infrastructure constraint in terms of highways and drainage resulting in prolonged negotiation and a delay in signing S106 agreement.

Source
Documents:

[South Wymondham Planning Applications, Decision Notices and other](#)

No 14 - Roundhouse Park, Cringleford



Located southwest of Norwich with the A11 to the south and the A47 to the west.

Site Details: 1065 units although original OP application limited to 750 dwellings, school, local shop, community facilities, playing fields, open space, roads, cycleways and footpaths.

Site History:

First outline application submitted by Cringleford Consortium Of Landowners in 2001 but limited to 750 dwellings on advice of Highways Agency. Approved with conditions in Aug 2004.

Further outline application (Bovis Homes Ltd & Twigden Homes Ltd) in 2008 for residential development (626 units) and associated infrastructure including open space and recreational woodland, site for Primary School, Community facilities and up to 1486sqm mixed use Neighbourhood Centre. Approved with conditions in Jul 2010.

Steady build up and reserved matters applications for housing developments over past years with several developers on site. This follows the completion of a new link road to the Norfolk and Norwich University Hospital which was completed in 2006.

à Allocation in South Norfolk Local Plan – 2003

01/1852/O

à Planning application (outline) submission for **01/1852/O** – 2001

Timeline: à Decision notice – August 2004

à Section 106 agreement – August 2004

à Construction start – 2007/2008

04/1823/D

à Planning application (reserved matters) submission for **04/1823/D** – 2004

05/2478/F (Variation on infrastructure condition)

à Planning application (reserved matters) submission for **05/2478/F** – November 2005

à Decision notice – January 2006

06/1407/D by Allison, now Bovis (40 Units)

à Planning application (reserved matters) submission for **06/1407/D** – June 2006

à Decision notice – September 2006

06/2031/D by Bovis (150 Units)

à Planning application (reserved matters) submission for **06/2031/D** – September 2006

à Decision notice – December 2006

06/2571/D by Twigden (98 Units)

à Planning application (reserved matters) submission for **06/2571/D** – November 2006

à Decision notice – February 2007

07/0435/D by Bloor (85 Units)

à Planning application (reserved matters) submission for **07/0435/D** – February 2007

à Decision notice – April 2007

08/2347/O (691 Units)

à Planning application (outline) submission for **08/2347/O** – December 2008

à Decision notice (reserved matters) – July 2010 (outline permission expires in 5 years unless detailed application for the first sub-phase is received). Permission for 626 units.

à Section 106 agreement – August 2004 with deed of variation December 2012

10/1324/D by Twigden (41 Units)

à Planning application (reserved matters) submission for **10/1324/D** – July 2010

à Decision notice – February 2011

10/1712/D by Bovis/Twigden (32 Units)

à Planning application (reserved matters) submission for **10/1712/D** – October 2010

à Decision notice – February 2011

11/1842/D by Kier (35 Units)

à Planning application (reserved matters) submission for **11/1842/D** – October 2011

à Decision notice – May 2012

11/2058/D by Persimmon

à Planning application (reserved matters) submission for **11/2058/D** – November 2011

à Decision notice – March 2012

12/1456/F by Bovis (132 Units)

à Planning application (reserved matters) submission for **12/1456/F** – July 2012

à Decision notice – March 2013

13/0400/D by Kier (27 Units)

à Planning application (reserved matters) submission for **13/0400/D** – February 2013

à Decision notice – April 2013

13/1523/F by Kier (45 Units)

à Planning application (reserved matters) submission for **13/1523/F** – August 2013

à Decision notice – November 2013

14/1019/D by Bovis (58 Units)

à Planning application (reserved matters) submission for **14/1019/D** – May 2014

à Decision notice – November 2014

14/1605/D by Kier (15 Units)

à Planning application (reserved matters) submission for **14/1605/D** – August 2014

à Decision notice – November 2014

15/1376/D by Bovis (106 Units)

à Planning application (reserved matters) submission for **15/1376/D** – June 2015

à Decision notice – December 2015

Local Authority: South Norfolk

Developer or Owner: Bovis Homes Ltd / Persimmon Homes Ltd / Twigden Homes / Kier Homes / Bloor Homes Eastern

(Planning) Consultant or Promoter: Bidwells

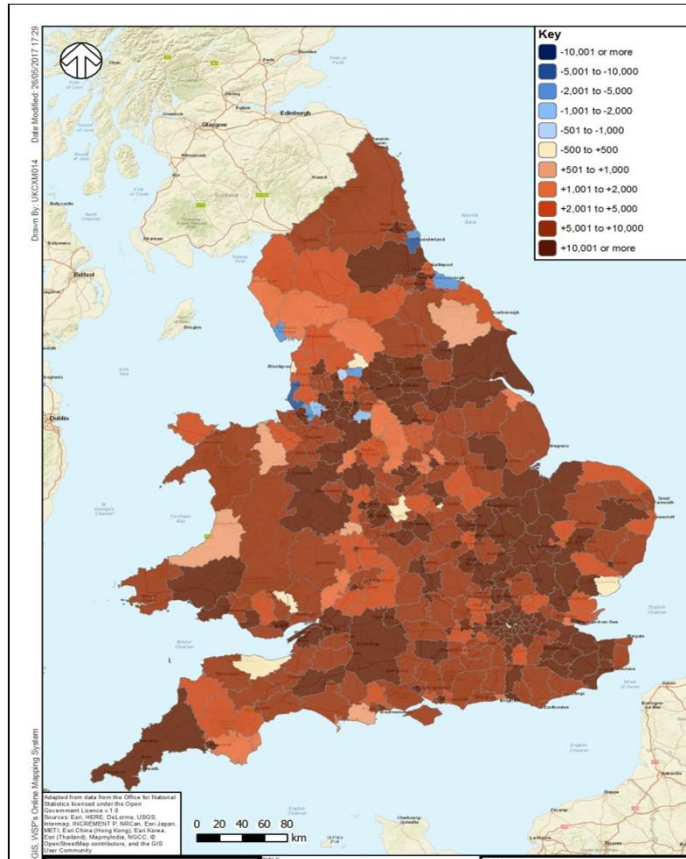
Site Specific Requirements: à Link road to Norfolk and Norwich University Hospital (constructed 2006)
à Affordable Housing Agreement

Source Documents: [Roundhouse Park Planning Applications & Decision Notices & S106 Agreements](#)

APPENDIX

B DEMOGRAPHICS





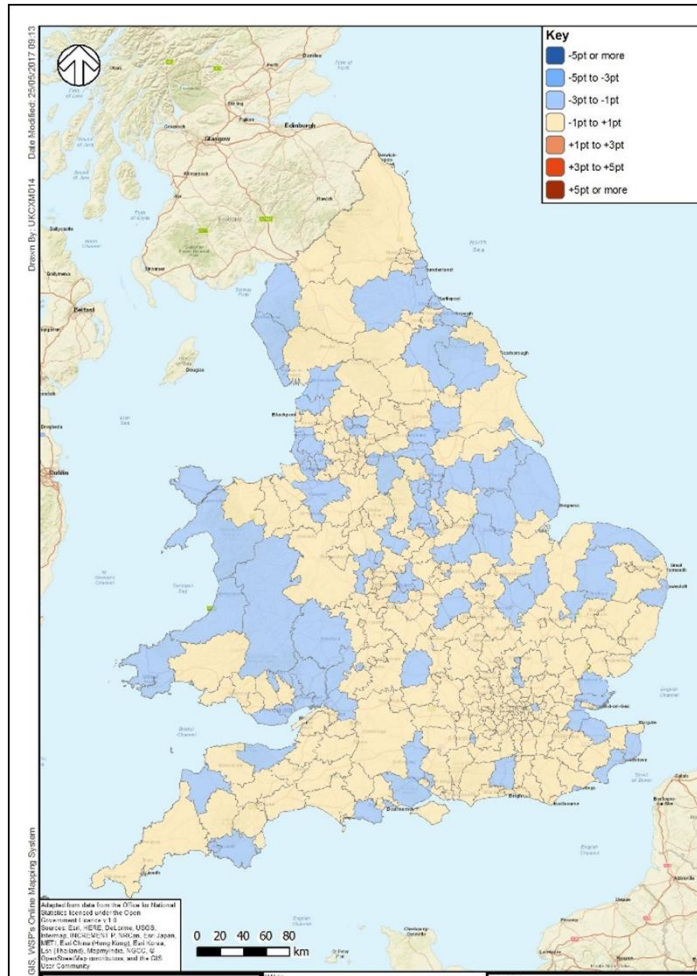
UK Growth in Total Population (2001-2011)

The population growth of England and Wales was distributed fairly evenly across the all regions. The greatest increase was recorded in urban areas but also in the southern districts of Yorkshire and The Humber, and the more western districts in the East. Very few districts in the North recorded population losses. Immigration and the UK's above average birth rate compared to other EU countries are contributing factors to population growth.



Local Growth in Total Population (2001-2011)

Within Norfolk, King's Lynn and West Norfolk, Norwich City, and South Norfolk experienced the greatest population growth of 10,001 persons. North Norfolk gained considerably fewer persons (1001 to 2000 persons). However it is known to be an area which has become attractive for second homes for people with primary residences outside of the district (so housing growth and demand in North Norfolk may be driven by external factors and not as closely related to resident population growth within the district).



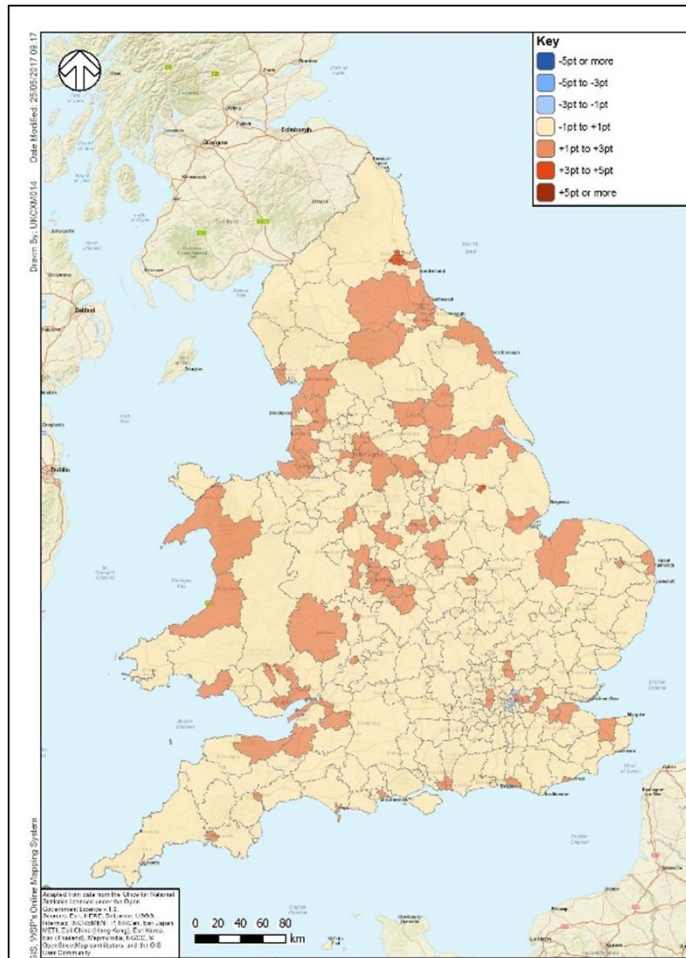
UK Growth in Population aged 0-5 (2001-2011)

The number of 0-5 year olds was stagnant in most parts of England and declining by 1-3% in some areas, particularly in Wales. The decline could be due to a variety of factors such as lower birth rates or the emigration of parents with young children.



Local Growth in Population aged 0-5 (2001-2011)

While in most districts the population aged 0-5 stayed the same in the decade between 2001 and 2011, a 1-3% decrease was recorded in Breckland, Great Yarmouth and North Norfolk.



UK Growth in Population aged 20-24 (2001-2011)

No big changes in the number of 20-24 year olds were recorded across England and Wales. While some parts of London saw a slight decrease of 1-3%, there were pockets of population growth all across Wales and England. Possible reasons could be the movement of students and young graduates as conditioned by the job and/or the housing market.



Local Growth in Population aged 20-24 (2001-2011)

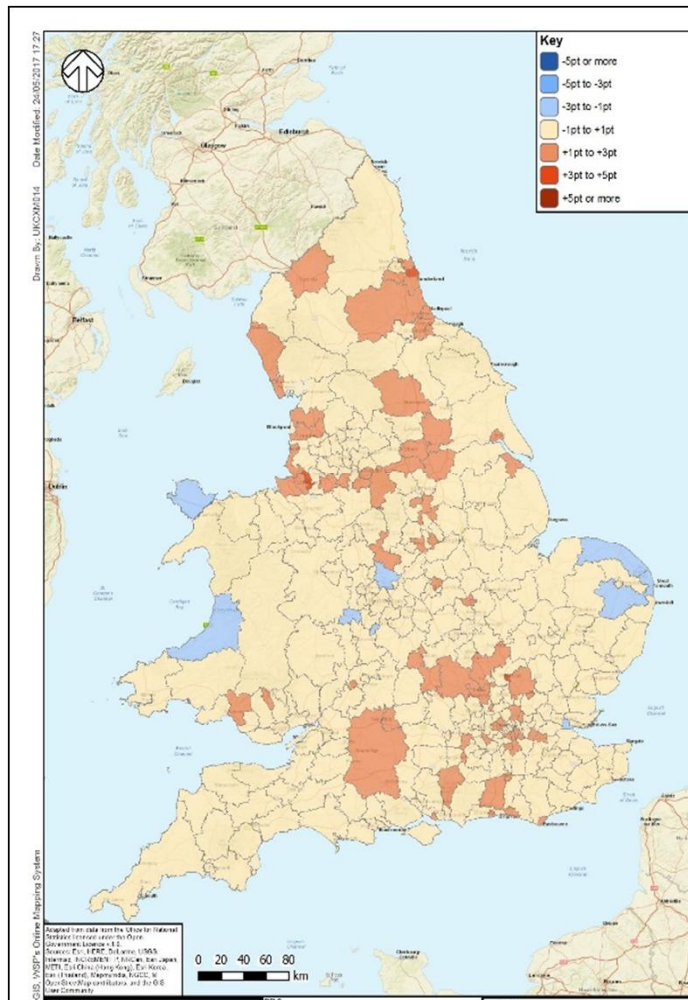
In the East, only Great Yarmouth, King's Lynn and West Norfolk, and Norwich City experienced a slight increase in the population aged 20-24. In other parts of the region no significant changes were recorded.



A map of the East of England region, showing administrative boundaries and place names. The map is color-coded: blue for most areas, yellow for some coastal and inland areas, and orange for a few specific areas. Place names include Skegness, Great Yarmouth, Lowestoft, Norwich, Thetford, Bury St Edmunds, Ipswich, Colchester, Chelmsford, Malden, and Margate. The English Channel is labeled to the south. The map also shows the River Great Ouse and the River Sture.

Local Growth in Population aged 25-44 (2001-2011)

The East follows a pattern very similar to that of England and Wales. While Norwich and Cambridge City were both marked by an increase in population aged 25-44, all other districts recorded decreases. These trends suggest a level of attractiveness of bigger cities, perhaps conditioned by the job market, that rural areas do not seem to match.



UK Growth in Population aged 45-59 (2001-2011)

Not too much change was recorded in the population aged 45-59. Noteworthy is however, that Wales and the East were the only regions without small pockets of population growth among 45-59 year olds. Instead they in parts recorded a slight decrease by 1-3%.



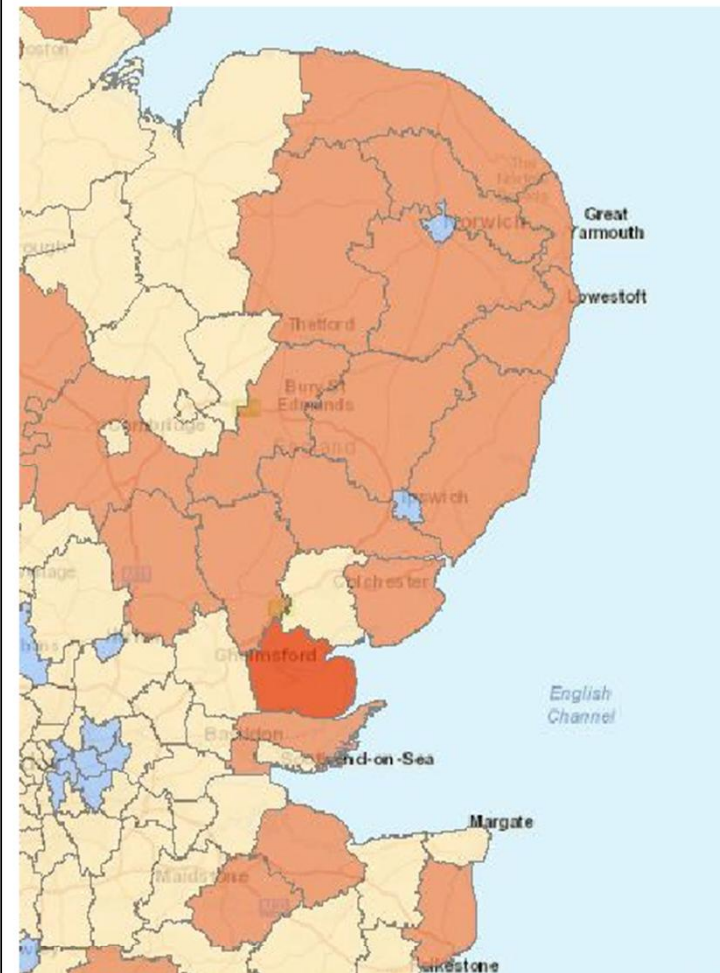
Local Growth in Population aged 45-59 (2001-2011)

In the East the population aged 45-59 decreased slightly. The declines of 1-3% were concentrated in three districts, namely North Norfolk, South Norfolk and Great Yarmouth. The out-migration of middle-aged adults could, among other factors, be conditioned by changes in lifestyle following the maturing of children.



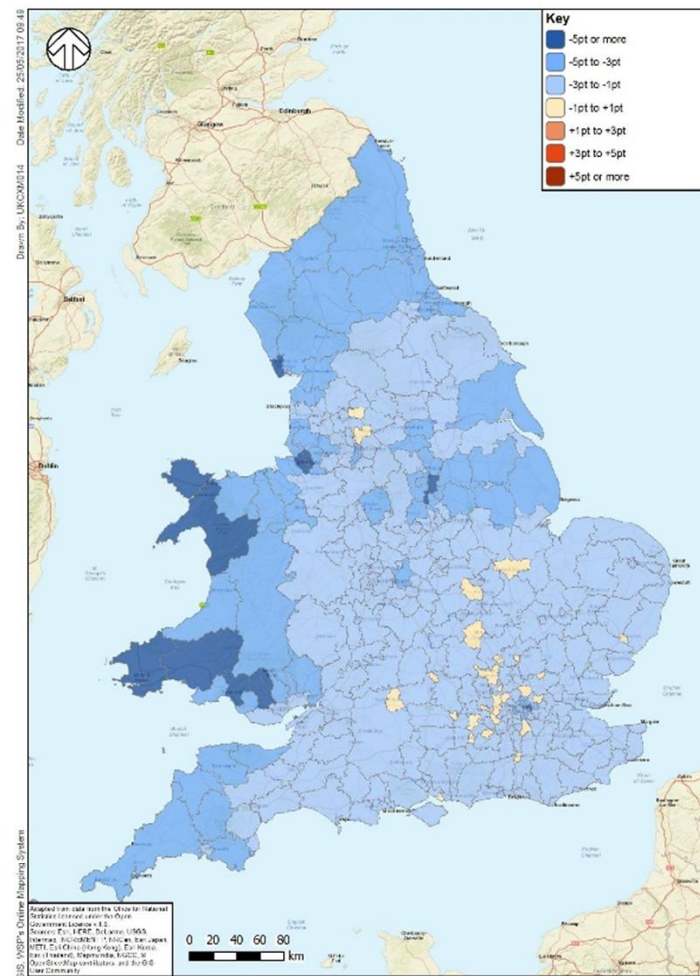
UK Growth in Population aged 65-74 (2001-2011)

Almost in reverse to the trends recorded for the population aged 25-44, most areas recorded slight increases of 1-3% in the population aged 65-74, while bigger cities such as London, Manchester and Norwich recorded slight decreases. Changes in lifestyle due to retirement and potentially conditioned by the housing market are a likely reason for these patterns.



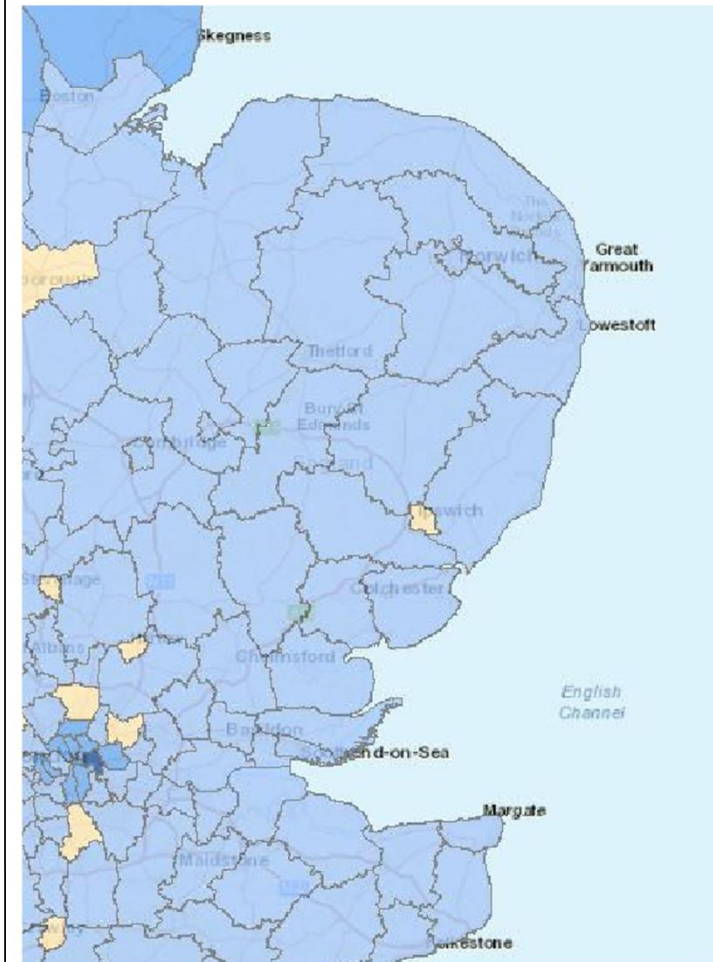
Local Growth in Population aged 65-74 (2001-2011)

The East mirrors the more general patterns of England and Wales regarding the population aged 65-74. While the cities of Norwich and Ipswich recorded a decrease of 1-3% in older adults, most other more rural and coastal districts experienced an increase of 1-3%. The district of King's Lynn and West Norfolk is a notable exception to this rule, as are the districts to its south and west.



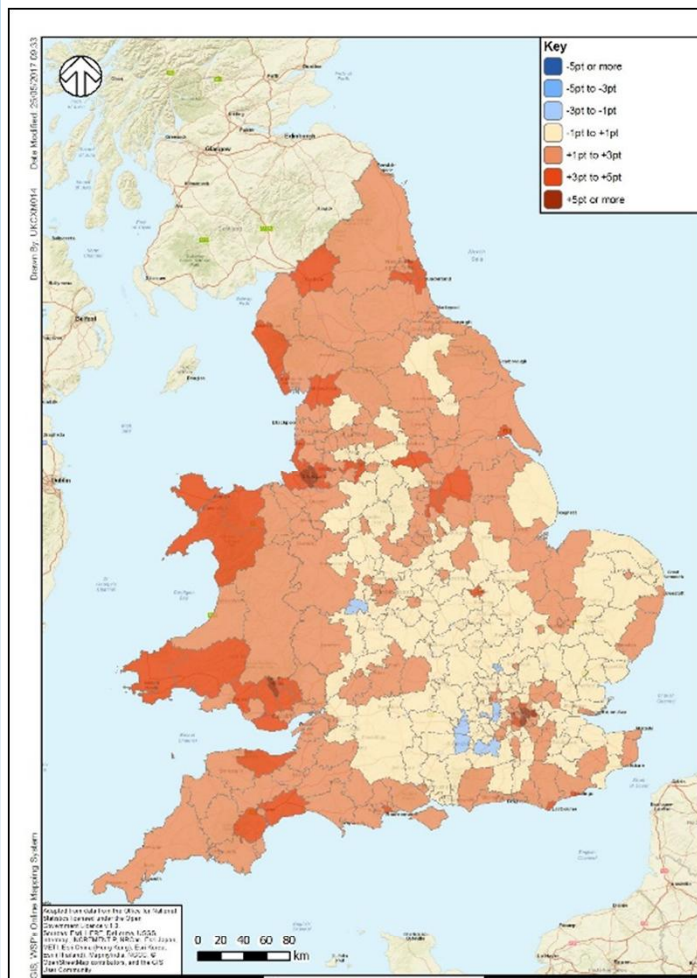
UK Change in non-working population (2001-2011)

The size of the non-working population shrunk across England and Wales. Particularly in the North West, the North East, Wales, the South West and in parts of the East Midlands the non-working population decreased most by 3 to more than 5%.



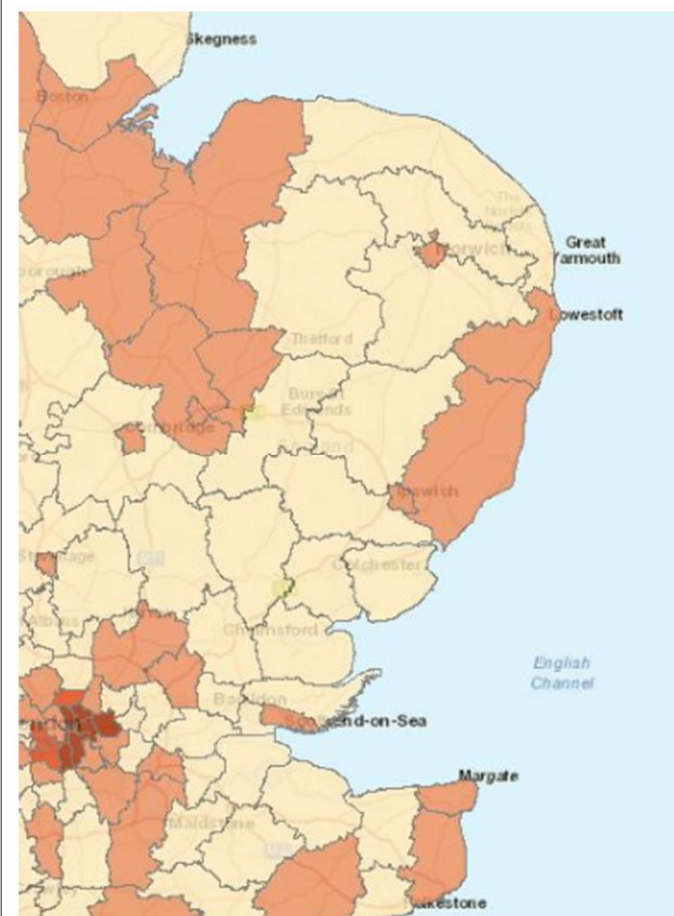
Local Change in non-working population (2001-2011)

In the East the profile is very homogeneous and mirrors that of most of England. In all districts, except Ipswich, the non-working population decreased by 1-3% in the decade between 2001 and 2011.



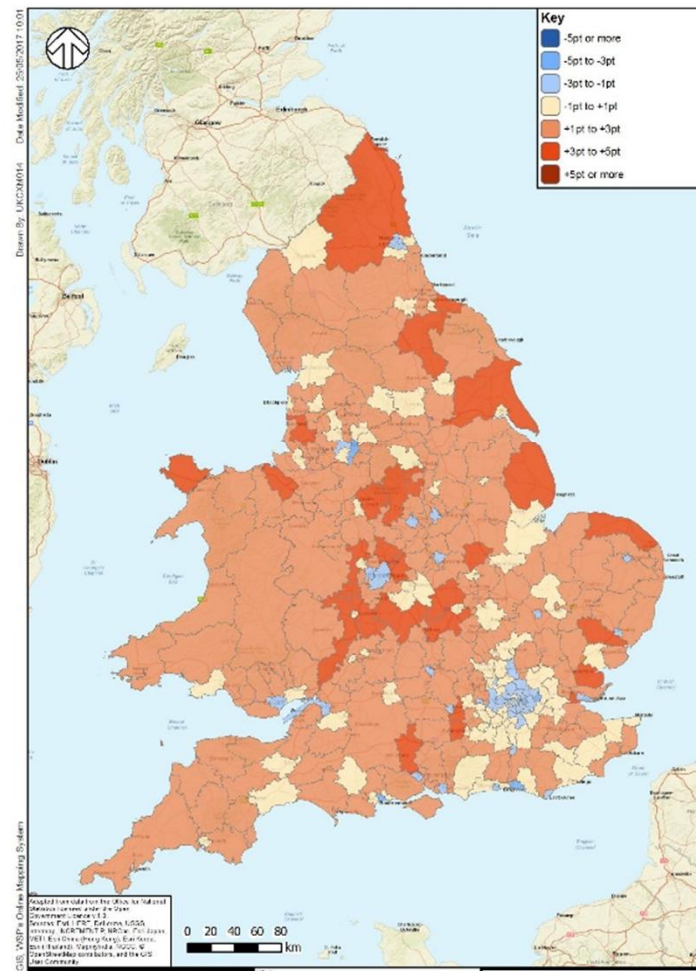
UK change in employed population (2001-2011)

The changes in the employed population in England and Wales match those in the non-working population. Regions and districts that recorded the highest decrease in the number of non-working persons also recorded the highest increase in employment levels. Districts with slightly lower decreases in their non-working population tended not to record changes in their employment levels.



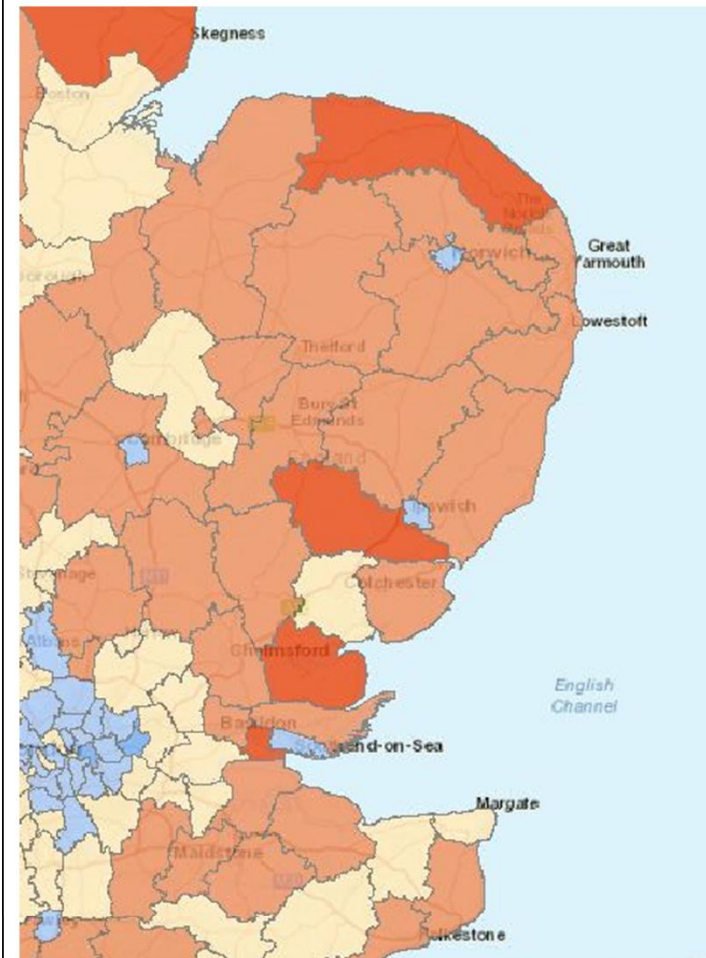
Local change in employed population (2001-2011)

While all districts in the East recorded a decrease in the non-working population, only King's Lynn and West Norfolk, Norwich City and a few other districts were marked by an increasing employed population. With regards to King's Lynn and West Norfolk, and the districts to its south and west, this ties in with them being some of the few districts that did not experience and increase in older adults aged 65-74.



UK change in retired population (2001-2011)

In line with the spatial patterns regarding age, most areas with an increasingly older population also recorded an increase in their retired population. Cities tended to experience a decline by 1-3% in their retired population suggesting that it is more attractive and/or feasible to retire in rural areas.



Local change in retired population (2001-2011)

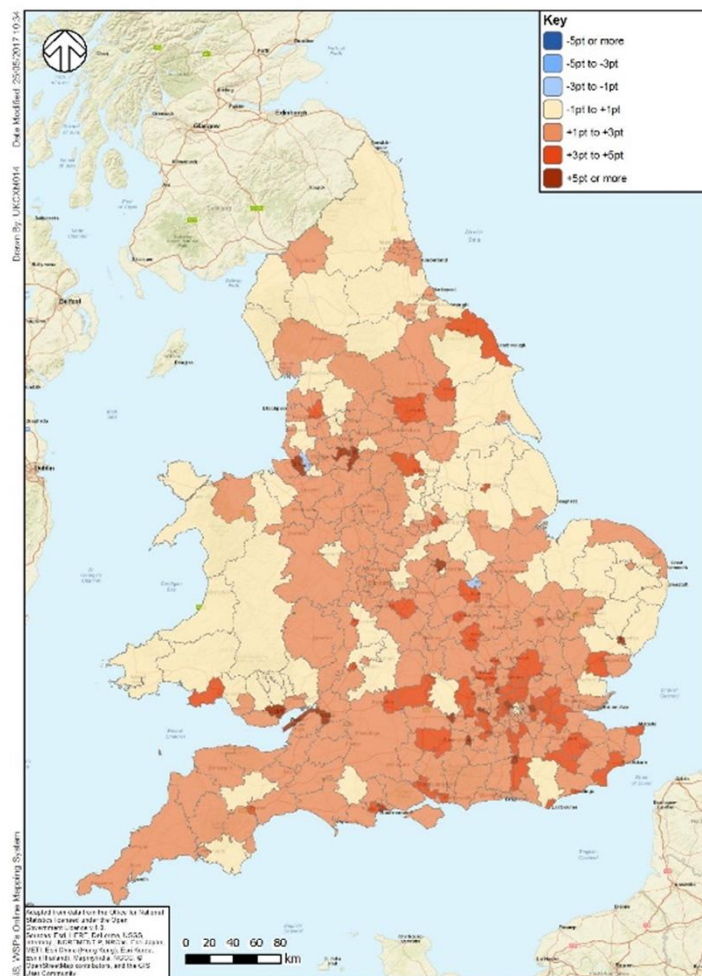
As was the pattern across England and Wales, the cities in the East, namely Cambridge, Norwich and Ipswich, recorded a lower number of retired persons in 2011 than in 2001. More rural areas on the other hand, and in particular North Norfolk by the coast, experienced an increase in retired population.



A map of Essex, England, showing its constituencies colored according to the 1997 election results. The map includes labels for various constituencies: Skegness, Boston, Great Yarmouth, Lowestoft, Thetford, Burgh, Epsom, Colchester, Chelmsford, Basildon, Malden, and Margate. The English Channel is also labeled. The map shows a mix of colors, with some areas in dark red (Conservative), some in light red (Labour), and some in yellow (Liberal Democrat).

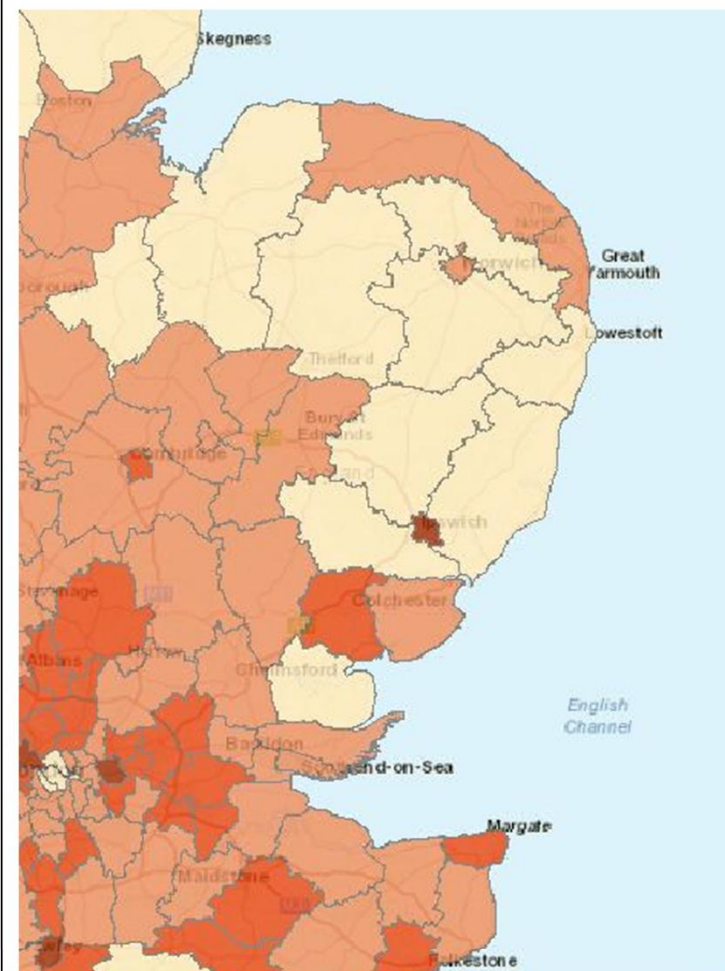
Local change in vacant dwellings (2001-2011)

King's Lynn and West Norfolk showed the biggest increase in vacant dwellings despite comparatively high population growth, a decrease in houses and bungalows, and a rise in employment levels. This may be a sign that the available housing does not match the needs of the population or may not be affordable.



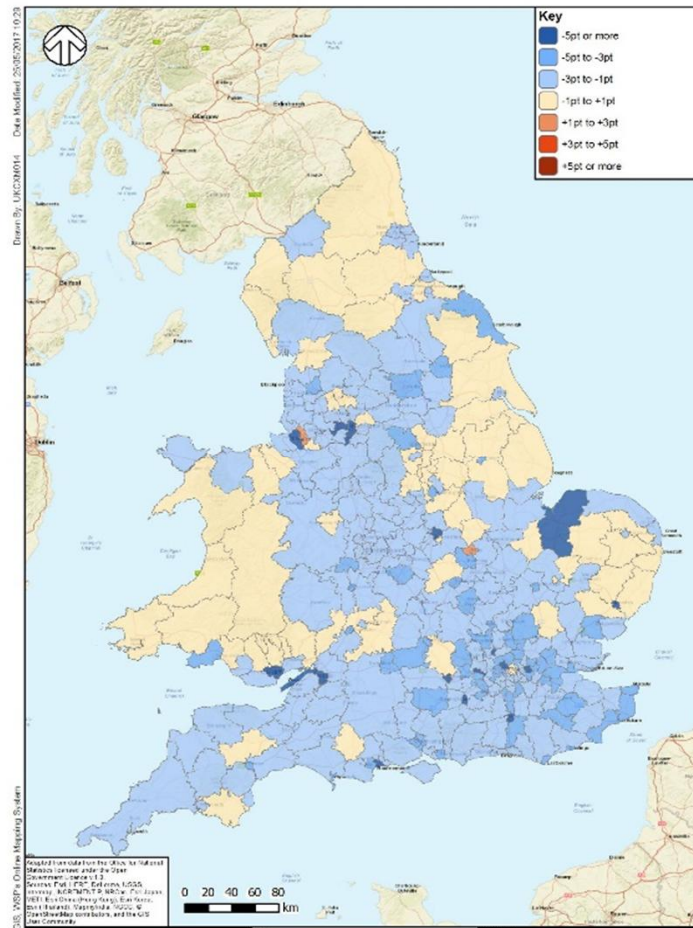
UK housing stock change - flats (2001-2011)

While Wales and large parts of the North and the East did not see a change in the number of flats, across the South and in the West Midlands, an increase of approximately 1-3% was recorded. Urban areas such as Liverpool, Manchester, Cardiff, Bristol, Ipswich and Greater London were marked by an even greater increase in housing.



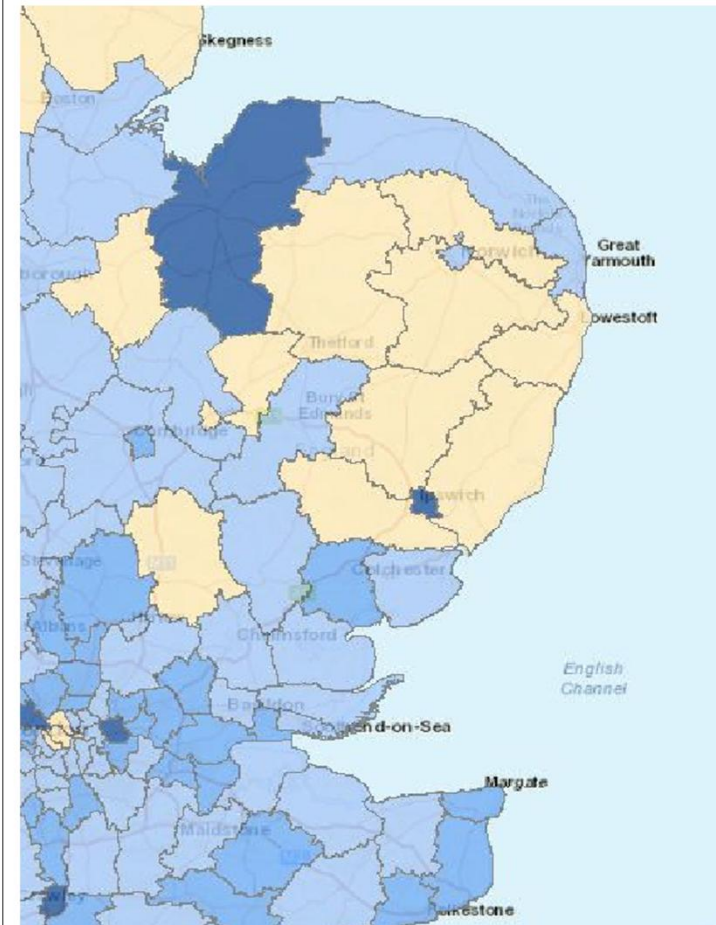
Local housing stock change - flats (2001-2011)

In the East, the cities of Cambridge, Ipswich and Norwich all saw an increase in flats. In other districts along the coast, namely North Norfolk and Great Yarmouth, more flats were built too. These areas were also among those that saw the greatest reduction in houses and bungalows suggesting a change in the housing stock more generally.



UK change in houses & bungalows (2001-2011)

Across England and Wales, the districts that saw an increase in flats also saw a decrease in houses and bungalows. Particularly in urban areas and in a number of districts in the Southeast the reduction in houses and bungalows and the increase in flats is most noteworthy with over 3%. This suggests a change in the housing stock to accommodate the needs of a growing population. In the areas where this change did not take place, such as Wales, a greater increase in vacant dwellings was recorded.



Local change in houses & bungalows (2001-2011)

Most districts in the East did not show too much change in the number of houses and bungalows. A slight reduction of 1-3% was recorded in North Norfolk, Great Yarmouth and Norwich City, the places that also experienced an increase in flats. Noteworthy are the changes in the district King's Lynn and West Norfolk where despite a decrease in houses and bungalows, little to no changes in flats, and a growing population, there was an increase in the vacant dwellings.

APPENDIX

C RAG MATRIX



	King's Reach, South Fairstead	South Fairstead, King Lynn	Thetford Sustainable Urban Extension	Land at London Road, Attleborough	Land to the North of Sprowston and Old Catton, Between Wroxham Road & St Faiths Road	Blue Boar Lane: White House Farm	Great Yarmouth Waterfront	Former Allotment Gardens, East Anglian Way	Northern expansion of Fakenham	Former HL Food Site and adjacent land, North Walsham	Three Score, Bowthorpe	Deal Ground	South Wymondham	Roundhouse Park, Cringleford
Hypothesis:	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Even in a buoyant market, there may be a tendency for developers to manage the delivery of private sale units in order to maintain sales values and address concerns about 'market absorption' – supply and demand balance and housing stock flow into the market;	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor
There may be a limited number of house builders currently involved in Norfolk's housing market means slower delivery;	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	not evident as a key factor	not evident as a key factor	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	Likely to be a key factor affecting delivery	not evident as a key factor
Concerns regarding build out costs , including access to materials and the availability of construction staff, which may present additional barriers to increasing housing output;	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Potentially a secondary factor
Understanding of the site risk – the cost of delivering new physical infrastructure necessary to support new development (eg. PT, rail, road and utilities) versus the viability assessment at pre-planning (particularly on marginal sites) and the associated phasing requirements for development – how long infrastructure takes to deliver (eg Norwich Northern Distributer Road);	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor
Small versus large sites, and the role of scale in terms of whether there is a focus on sites below <500 homes;	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor	Potentially a secondary factor
Condition discharge , and delivering s106 obligations take longer than planned and timing of ecology/environmental mitigation. Planning permission often comes with stipulated requirements and conditions, which may themselves lead to further delay. This can be further delayed if there is major infrastructure or site remediation requirements. Conditions that have been agreed are renegotiated at reserved matters stage causing delays. This uncertainty can delay funding and financing;	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor	N/A	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	Potentially a secondary factor	not evident as a key factor
Permitted scheme is not deliverable due to onerous requirements – comes back for planning in revised form less acceptable to planning authorities, but better market value – lack of flexibility;	not evident as a key factor	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Likely to be a key factor affecting delivery	not evident as a key factor	N/A	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor
Challenges with land assembly fall out or lack of agreement on land values and cash-flow issues for what are larger scale and more complex sites with greater abnormal costs. Linked to this are the form of contracts for promotion, purchase and construction/delivery of homes relate to market pressures. Sites with outline planning only may then be parcelled up and sold on for others to resolve reserved matters/conditions, introducing delay to agree this. For example, land promoters could derive their return from the granting of permission achieving a residential land value (with profit reflecting planning and land disposal risk) rather than the	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	not evident as a key factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Potentially a secondary factor
Developers buy the land (or option on the land) and gain consent in order to demonstrate to their shareholders that they have land available in the future to continue house building, so making them a worthwhile investment, and whether "land banking" exists. Albeit there may be maximum timescales before needing to trigger a return on the up-front investment on a site;	not evident as a key factor	not evident as a key factor	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor
Changing economic climate uncertainty versus mix of housing types, tenures consented; and	not evident as a key factor	not evident as a key factor	Potentially a secondary factor	Potentially a secondary factor	not evident as a key factor	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	Likely to be a key factor affecting delivery	not evident as a key factor	Potentially a secondary factor	Likely to be a key factor affecting delivery	not evident as a key factor	not evident as a key factor
Outside/external factors from third parties – unable to control utilities providers and time, for example Traffic Regulation Orders (TRO) and powers to deliver (eg any CPO) and third party land requirements.	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	not evident as a key factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Likely to be a key factor affecting delivery	Potentially a secondary factor	Potentially a secondary factor	Potentially a secondary factor	Likely to be a key factor affecting delivery	not evident as a key factor	Likely to be a key factor affecting delivery	Likely to be a key factor affecting delivery	not evident as a key factor

APPENDIX

D EXAMPLES OF BEST PRACTICE



theWestofEngland Planning Toolkit 2012

making the planning process work better for everyone

The four West of England authorities and the Local Enterprise Partnership (LEP) have jointly published this toolkit to promote a more positive and consistent approach to handling large scale and complex development proposals – one where the authorities, developers and stakeholders work together to deliver high quality planning applications and effective decision taking.

It has been produced because a streamlined and collaborative planning system is key to securing the investment needed to protect and enhance the environment and enable sustainable economic growth.

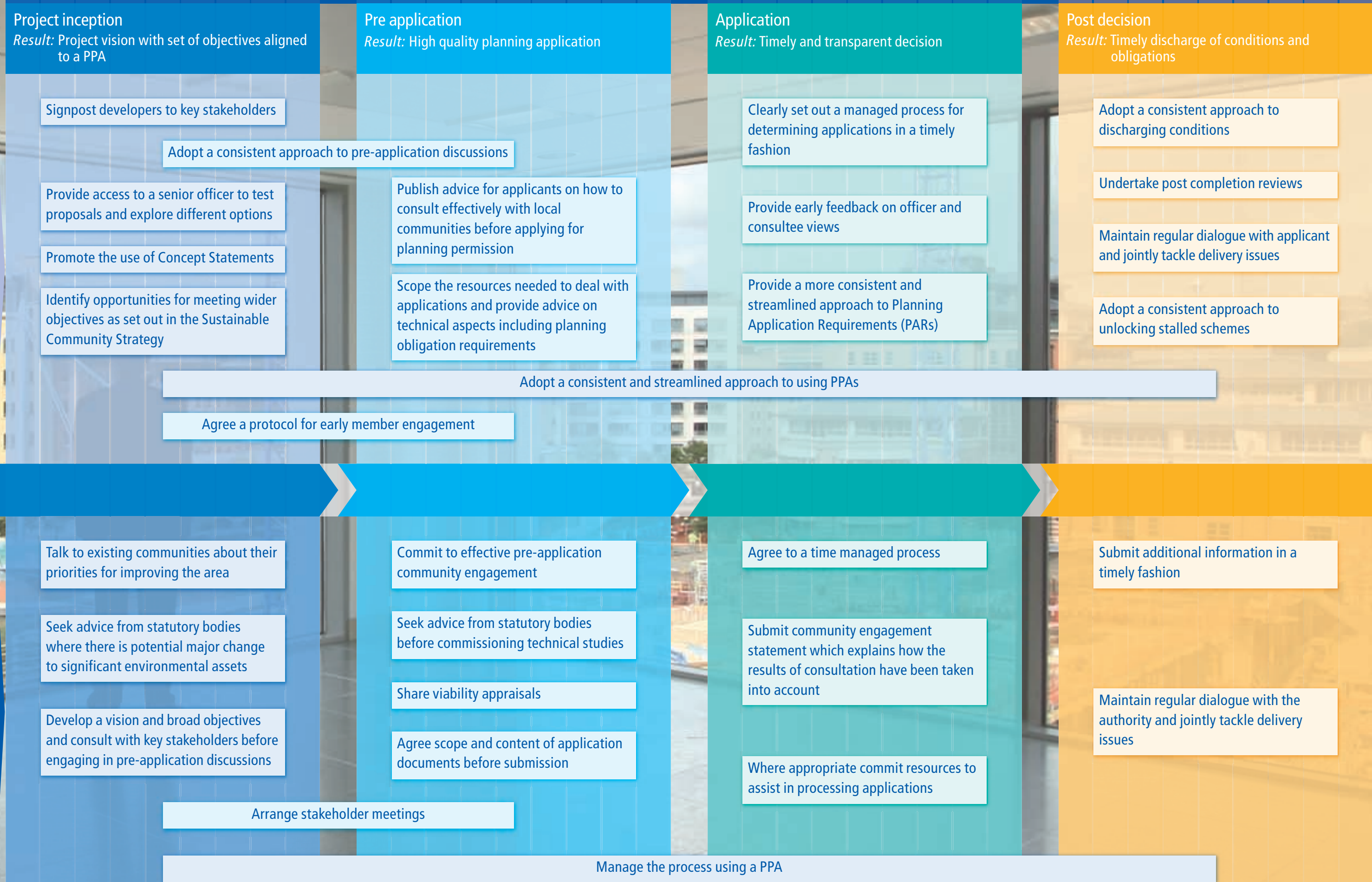


part one Culture, Values and Behaviour

Our approach to managing development proposals within the West of England will be based on the following principles:

- **Working in partnership:** the authorities will work collaboratively with applicants and other stakeholders to simplify the development management process.
- **Acting positively:** we will adopt a positive "can-do" approach, working proactively with applicants to unblock development and identify opportunities to add value to proposals which meet local visions.
- **Front loading:** we will explore with applicants different ideas and options for sites early on before proposals get fixed.
- **Effective pre-application discussions:** we will encourage applicants to enter into pre-application discussions and to engage with those communities most affected by development before planning applications are submitted.
- **Be proportionate and realistic:** we will discuss with applicants what information is required to support plans and proposals and be realistic about the resources required.
- **Being businesslike:** we will use robust project management tools to reduce uncertainty and delay when dealing with applications.
- **Being open and flexible:** we will be open and transparent in the sharing of information and work flexibly to respond to changing circumstances.

part two Improvements to the Development Management process for large scale and complex proposals



What the Unitary Authorities will do

What the Unitary Authorities will do

What developers will do

What developers will do

"Business needs planning applications to be decided quickly and efficiently. The publication of the new planning toolkit is therefore timely and provides an excellent framework for all parties to work to and Knightstone welcomes its publication."

Mike Day – Director of Development and Home Ownership, Knightstone Housing Association, part of the Arcadia Housing Group

"The four Councils are already working to simplify the way in which planning applications are handled. Including some examples of good practice within the Planning Toolkit will help us to work together with business more consistently. We think this will make the planning process work better for everyone and result in higher quality planning applications and effective decision taking."

Councillor Tim Ball, Executive Member for Homes and Planning, Bath & North East Somerset Council

part three Practice Guide

The four authorities have published their own detailed protocols and practices which have been tailored to each area and these will continue to operate.

Each authority is also committed to importing good practice from its neighbours, especially when dealing with large scale and complex proposals, in order to improve consistency and certainty for developers thinking of investing in the area. The following examples are linked to the key principles, set out in Part One of the toolkit.

Partnership Working

In 2011 Bristol City Council updated its Planning Protocol for engaging with business. It contains detailed guidance when dealing with 'Major' applications.

Concept Statements

South Gloucestershire Council encourages developers to prepare 'Concept Statements' before they submit a planning application. These are concise illustrations of the vision and broad principles for developing a major site and are usually submitted to the council for endorsement following public consultation. Further details are set out in the council's Statement of Community Involvement – adopted May 2008.

Planning Performance Agreements

All four authorities promote the use of Planning Performance Agreements (PPAs) as a project management tool for dealing with large scale and complex proposals. South Gloucestershire Council has published its own PPA Charter and Bristol City Council has included guidance in its Planning Protocol document.

The Development Team approach

For large scale and complex schemes each authority establishes a Development Team of officers representing a range of services. These teams meet regularly and provide detailed advice to applicants.

North Somerset Council has taken this one step further by introducing an Economic Development Protocol aimed at maximising the benefits of investing in major employment opportunities.

Next Steps Programme

The authorities are committed to working collaboratively with developers using this toolkit as a framework. Alongside the Planning Toolkit they will also publish and keep up to date a 'next steps programme' which will aim to continuously improve how large scale and complex proposals are handled as part of the development management process.

"The delivery of infrastructure and housing is a key priority for the LEP, and the Planning Toolkit will help to achieve a quick and efficient planning system capable of delivering sustainable development which will help the LEP to meet its targets for jobs and economic growth."

Robert Sinclair, CEO Bristol Airport

"The Planning Toolkit provides a significant step forward in creating a more consistent and ultimately more timely approach to determining applications. As a framework for developing greater understanding between all parties concerned it is warmly welcomed."

Nigel Holland, Managing Director, Taylor Wimpey Bristol

Planning Performance Agreement Charter

Approved November 2009



Introduction

The management of future development to deliver well designed, high quality and sustainable communities is one of this Council's main priorities – as set out in the Sustainable Community Strategy.

In line with this and to support delivery of planning policy, this Charter promotes a partnership approach to bringing forward major development in South Gloucestershire to ensure that planning decisions are made in a timely manner, preferably through the use of a Planning Performance Agreement (PPA) that is formally agreed and signed. PPAs set out a structured approach to work programming and project teams, to bring forward major new development proposals.

This Charter was approved by Executive Member decision (September 2009) as the Council's preferred approach to project managing the planning and delivery of large and complex development proposals.

Aims

- South Gloucestershire Council is committed to encouraging new investment of the highest quality that contributes to the well-being of existing and future communities
- South Gloucestershire Council recognises that successful delivery of significant major developments requires commitment to partnership working, sound project management and effective communications with developers, the community and other agencies
- South Gloucestershire Council recognises that it is important to reduce delays and uncertainty for developers and local communities in bringing forward proposals for sustainable development.

Consultation

This Charter has been prepared in consultation with Developers, Councillors and key stakeholders including the Homes and Communities Agency Advisory Team for Large Applications, the Environment Agency, Natural England and the Highways Agency.

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3	Benefits of a planning performance agreement
4	Developments qualifying for a PPA
5	Key tasks and information required
6	Responsibilities under the charter
7	Signing the PPA
8	Process for submissions of major planning applications
8	Funding

Front cover (main photo):
Western Approach
Business Park Avonmouth

Right:
Carsons Road
Mangotsfield

Approach to planning performance agreements

- Where large major development proposals are in principle considered by South Gloucestershire Council to be in accordance with policies in the Local Development Framework for South Gloucestershire and other relevant policy, and capable of delivering significant social, economic, and environmental benefits as part of realising the Council's vision for the locality, the Council will set up a Project Team approach with relevant key stakeholders and seek to manage the project through a Planning Performance Agreement (PPA).
- South Gloucestershire Council is committed to delivering quality development in line with planning policy and best practice and in a manner that meets or exceeds Government performance target on timely processing of planning applications (NI157).
- South Gloucestershire Council therefore offers applicants either a tailored, agreed and signed PPA specific to meet the needs of their development proposals, **or** a commitment to deliver a planning decision, within 13 weeks from registration (or for 16 weeks where there is an Environmental Impact Assessment). In order to achieve the thirteen/sixteen week deadline, there could be no substantive negotiations during the processing of a planning application.
- It is important that all partners understand that a PPA is a structured way of working and is not a contract. As such, a PPA will not bind South Gloucestershire Council officers to a final recommendation nor override the requirement for a formal planning application to be determined without prejudice and within the statutory requirements of current planning legislation.



Stoke Park

Benefits of a planning performance agreement

A PPA will deliver clarity, speed and certainty through the following:

- Early consideration of relevant issues, an agreed approach to the project management and resourcing of a proposed development from initial inception through to determination and implementation of a planning application(s)
- An initial inception meeting with key South Gloucestershire Council officers, and appropriate delivery partners to discuss a proposal and to formalise a PPA, including:
 - *the broad vision and objectives*
 - *approach to consultation*
 - *key issues and tasks*
 - *project team(s)*
 - *decision making framework*
 - *the project programme*

Further advice and guidance on PPA's can be found in the ATLAS guide www.atlasplanning.com

- A model PPA can be found on the South Gloucestershire website www.southglos.gov.uk





*New housing -
Bradley Stoke*

Developments qualifying for a PPA

While the Council recognises that there is a need for efficient processing of all applications, it will seek to secure a PPA approach to large scale proposals as defined in the Statement of Community Involvement (SCI):

- Residential - with 200 or more dwellings
- Non-residential- for all other uses a large scale major application is where the floor space proposed is 10 000sq metres or more, or the site is over two hectares

There may be other complex or sensitive sites below these thresholds that may be suitable for a PPA by agreement. These will be treated on a case by case basis.

For developments and associated infrastructure that come under the new Infrastructure Planning Commission, it is expected that a Planning Performance Agreement will be entered into with the developer, including agreement to funding the necessary Council staff time. This will ensure that resources can be allocated and work programmes met.

The Council will not normally enter into a PPA or be prepared to commit its resources to support work on proposals which are in clear conflict with planning policy, unless other material planning considerations indicate that there would be clear positive spatial planning outcomes for the locality from such proposals. Careful consideration will be given to such proposals in advance of entering into a PPA to ensure that there is sufficient common ground to enable effective partnership working amongst key stakeholders, including members of the Council.

The PPA is intended to cover the full process of planning a major development from an initial inception meeting when a shared vision for the site would be developed, through Concept Statement and public engagement to management of the application process and the post decision stages. A PPA approach is however also suitable for sites where a Concept Statement and/or masterplan is already in place. The Adopted Statement of Community Involvement (SCI) sets out requirements for stakeholder involvement, including community, external organisations and Councillors in both the development of planning policy and the determination of planning applications.

As set out in the SCI, for larger and some more sensitive sites, a Concept Statement will be required. This is a concise, diagrammatic document that sets out a vision, illustrates broad principles for the development of the site, and sets the context for the Design and Access Statement and subsequent development of more detailed proposals. The Concept Statement should be the subject of public consultation and is submitted to the Council for formal 'endorsement' by the Executive Member for Planning, Transportation and Strategic Environment before any planning application is submitted. Councillor and community involvement is critical to the evolution of Concept Statements, and local members should be involved in the very early stages of setting the vision and broad principles for the site. For further information on Concept Statements see South Gloucestershire Council's Statement of Community Involvement. Subsequent to the Concept Statement, Masterplans and design briefs may be required, and the approval process for this has again been endorsed by Executive Member decision.

These requirements will need to be taken into account when developing the work programmes and approaches set out in a Planning Performance Agreement. Failure to do so would make it impossible to enter into a PPA, and would be a material consideration in determining any planning application.

Key tasks and information requirements

Preparation Stage

The developer will need to consider and agree with SGC and key stakeholders the information that will need to be understood or be required to progress the proposal through each work stage. This will include:

- A review of the policy position
- A review of the evidence base, including identification of gaps
- Evolving a shared vision and agreed development objectives
- Understanding the requirements of the SCI, including the need for a Concept Statement and subsequent masterplans and design briefs where appropriate
- Identification of relevant stakeholders and consultees, including Councillors and external organisations
- Identification of issues and tasks
- Consideration of the material needed for a planning application to be validated, processed and determined, including where relevant the need for an Environmental Statement, Transport Assessment, Design and Access Statement, Sustainability Appraisal, Appropriate Assessment etc
- Consideration of available resources, including statutory agency and service provider input.

At this stage the parties will also need to consider and agree the following procedural issues:

- Composition of the project team
- Project management structure and roles and responsibilities
- Decision making process, including conflict resolution
- Community engagement strategy
- Member involvement
- Preparation of a work programme, including timetable, key dates and workstream owners.



New housing Stoke Park



Carsons Road Mangotsfield



New housing
Carsons Road

Responsibilities under the charter

For PPAs to work successfully, responsibility rests with **both** South Gloucestershire Council **and** the potential planning applicant/developer.

Shared responsibilities:

- When a proposal is accepted for a PPA, both South Gloucestershire Council and the developer will identify project managers and point of contact who will co-ordinate their respective teams. For South Gloucestershire Council this will usually be a member of the Major Sites Team
- Arrange an inception meeting of key stakeholders, to discuss issues and agree a shared vision, identify key issues and tasks and develop a work programme to an agreed timescale
- Agree membership and roles for the steering group meetings involving the development team in a timely manner
- Agree a project plan for each development with the developer, setting out the key stages and milestones of the process and any review mechanisms, including preparation of a Concept Statement, masterplans and design briefs if appropriate
- Respond within the agreed timescales to requests for further information and/or revisions
- Regularly review the work programme and provide feedback for necessary revisions
- Agree mechanisms so differences can be resolved, such as negotiating changes to work programme or dealing with unforeseen site conditions
- Agree the fee for pre-application work in accordance with the Council's charging policy www.southglos.gov.uk/NR/exeres/fa254484-6049-4744-a0e3-f7e80ff1b521
- All parties will use their best endeavours to commit resources to ensure that project timescales and key milestones are met. In the event that delays are encountered, it is acknowledged by both parties that this is highly likely to have a knock on effect for the future work programme

South Gloucestershire Council Responsibilities:

- Set up inception meeting with relevant South Gloucestershire Council Councillors and officers and provide details of key stakeholders
- The Council's project manager will appropriately engage with South Gloucestershire Council members to ensure that they are openly engaged with the development of the project, but ensuring that their decision making function is not compromised. The project manager will keep the local ward members, Executive Member and the spokespersons of the relevant Development Control committee informed at the key milestones of the PPA
- Commit resources to ensure delivery on the agreed project plan, and keep the developer informed of progress on key work stages
- Identify whether a Concept Statement is needed and the timetable to achieve it
- Provide details of what further information may be required for assessment/acceptability of the scheme

- Provide early identification of key issues that need to be resolved in any development
- Set up in-house project team to include other service departments as appropriate, and ensure appropriate representation at meetings
- Promote the engagement and commitment of external agencies to the PPA work plan
- Ensure early commencement of discussions to agree benefits and impact mitigations, via planning obligations/Community Infrastructure Levy

Developer Responsibilities:

- Approach discussions on the development in an open, collaborative and a creative manner
- Employ high quality staff/consultants with sound and appropriate expertise
- Pay the required pre-application/planning fee
- Provide a single project team member/manager empowered to represent the collective developer interest where multiple interests are involved
- Ensure early and ongoing engagement with external agencies as appropriate
- Ensure compliance with the Adopted Statement of Community Involvement, including where necessary the production of a Concept Statement
- Undertake an urban design analysis to inform the evolution of the scheme, including the development of masterplans and design briefs as appropriate and subsequent design and access statement
- Fully commit to the process and recognise that adequate time needs to be allowed for preparation of essential information, community engagement and assessment of proposals
- Attend project meetings with the relevant persons
- Keep South Gloucestershire Council informed of progress at all key stages of the project
- Submit a complete planning application with all the requested and supporting information as agreed with South Gloucestershire Council, including a draft legal agreement where appropriate
- Demonstrate a commitment to the long term delivery of the proposals.

Signing the PPA

In order for a PPA to be formalised it must be signed by both parties. It is proposed that signatories on both sides are at Director level or as delegated.

Where there are critical issues eg transport, flooding, relating to an external organisation, it will be necessary to gain the commitment of that organisation in the project plan. The signature of an appropriate officer may therefore be required. This will be assessed on a case by case basis.



Stoke Park

APPENDIX 1: Process for Submission of Major Planning Applications



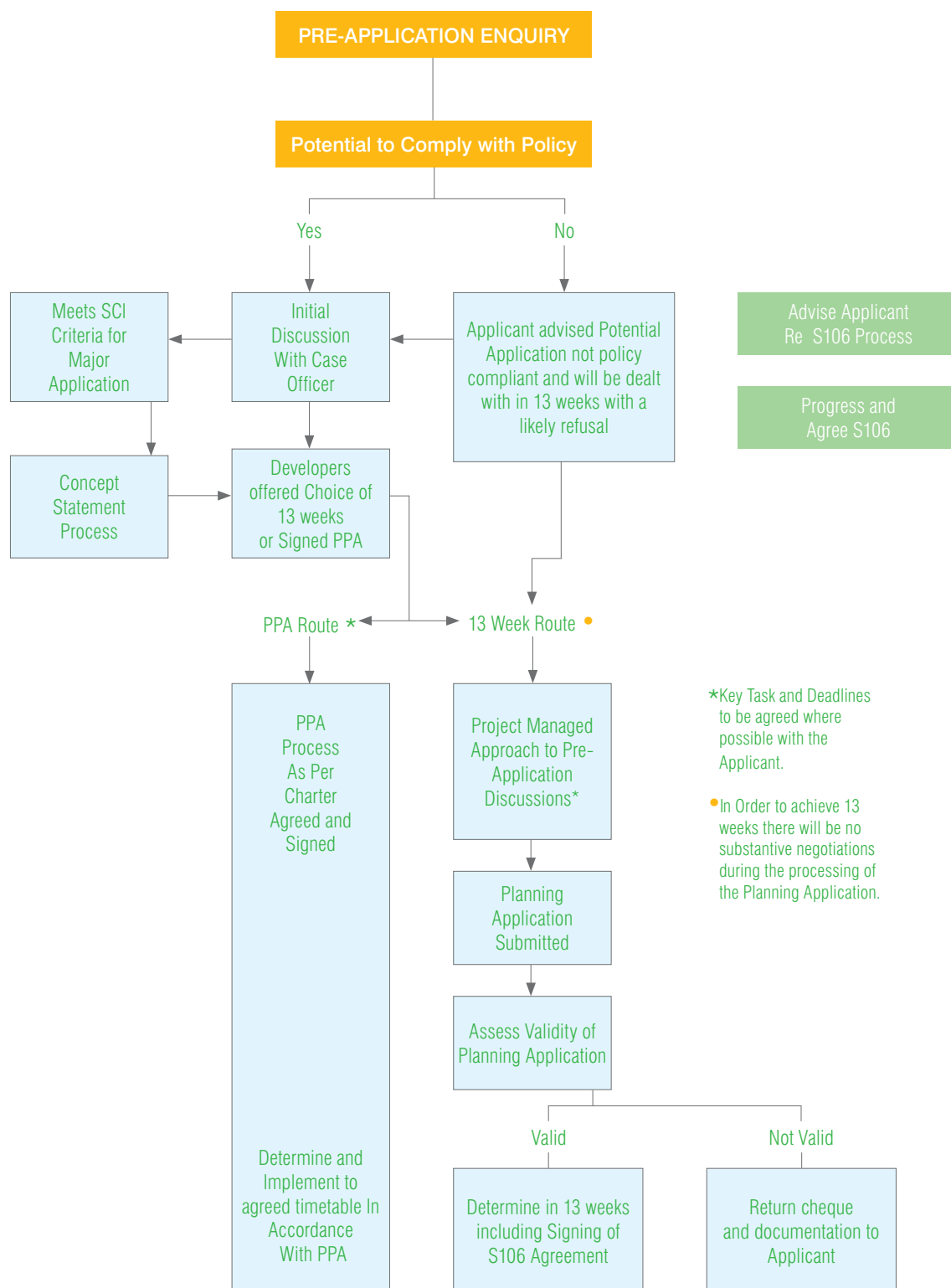
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For more information about this publication contact 01454 863467 www.southglos.gov.uk

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Funding

- South Gloucestershire Council has an expectation that the preparation of application material, production of technical reports and community engagement activity will be funded by the applicant
- South Gloucestershire Council will not charge for policy advice relation to the production of Concept Statements.
- There is standard rate charge for pre-application advice following the preparation of the concept statement process. Details are available at www.southglos.gov.uk



Appendix 1

Illustrative PPA pro forma

Project Name	
Project Description	
Local Planning Authority (/ies)	
Applicant/Developer	

1. Procedural Arrangements

Project Board

Name	Position and role	Contact details
	Board Chair	
	LA Project Manager	
	Lead Council Officer	
	Lead for Developer	
	Developer Project Manager	

2. Task Team/s

Name	Position and Role	Contact Details
	Task Team Chair	
	Group Members (list)	

3. Decision Making Framework

Insert flow chart / description to show management and decision making process and forum

4. Vision

Explanation of the scope of the project and intended outcomes for the development

5. Key Issues and Task Plan

Issue	Task / Action	Responsibility	Progress	Timetable/ Target Dates

6. Programme

This will normally be attached as a chart

7. Signatures

Name and position	Signature	Date

APPENDIX

