

Greater Norwich Housing Land Supply Assessment 1st April 2025 to 31st March 2030

1. Summary

- 1.1 This note sets out the housing land supply assessment for the Greater Norwich area for the period 1st April 2025 to 31st March 2030. It is a note that responds to the Government's changes in the December 2024 National Planning Policy Framework (NPPF).
- 1.2 This position statement sets out that for the 5-year period 1st April 2025 to 31st March 2030 the housing land supply position is 4.85 years. Built into this calculation is a 5% buffer required by NPPF paragraph 78 (a) "to ensure choice and competition in the market for land".
- 1.3 Since the adoption of the GNLP in March 2024 the supply of new housing sites has continued to be challenging, with a contributory factor being the availability of measures to address Nutrient Neutrality. The supply of homes between 1st April 2025 to 31st March 2030 is now forecast at 10,187 a reduction of 2,405 homes from the 12,592 homes that the GNLP projected over 1st April 2023 to 31st March 2028 (ref. [GNLP Appendices Housing Trajectory](#)).
- 1.4 Paragraph 61 of the December 2024 NPPF sets the context of significantly boosting the supply of homes across England and the Greater Norwich area is no exception. Currently Greater Norwich can use the GNLP requirement plus a buffer of 5%, but in accordance with NPPF paragraph 78 (c) the buffer will rise to 20% in 2026, and ultimately under the Government's new local housing need methodology the Greater Norwich requirement will rise to 2,590 homes per annum.

2. Introduction

- 2.1 Changes at paragraph 78 of the December 2024 NPPF mean that the Greater Norwich authorities should publish a 5-year housing supply statement. This note responds to the new NPPF paragraph 78, and upon its publication this note becomes a material consideration when determining planning applications.
- 2.2 The Greater Norwich authorities have an excellent record in plan-making, and adopting the Greater Norwich Local Plan (GNLP) in March 2024 represented an important new step in providing a plan-led approach to meeting the area's local housing needs. Notably, the GNLP set a local housing requirement for 40,541 homes between 2018 and 2038.

3. Calculating the Local Housing Need (LHN)

- 3.1 The Greater Norwich authorities are basing their LHN on the GNLP housing requirement of 40,541 homes over the period 2018 to 2038 (ref [GNLP Table 6](#)). NPPF paragraph 78 allows this because the GNLP is less than 5 years old.
- 3.2 Based on the 20-year lifespan of the GNLP, the local housing requirement of 40,541 homes, equals 2,027 homes per year. However, since the base-date of the plan completions have exceeded the annual average requirement, and between 1st April 2018 and 31st March 2025 a total of 15,316 homes have been completed. Table 1 shows annual completions since the base-date of the GNLP.

Table 1: Annual Greater Norwich Housing Completions since 1st April 2018

Year	18/19	19/20	20/21	21/22	22/23	23/24	24/25	Total
Housing Delivery	2,936	2,304	1,602	1,886	2,358	2,338	1,892	15,316

- 3.3 The delivery of 15,316 homes since 1st April 2018 means there are now 25,225 homes to deliver by 31st March 2038. Divided by the remaining 13 years of the plan period this equals an average of 1,940 homes per year.
- 3.4 With an annual requirement of 1,940 homes per year, the five-year requirement from 1st April 2025 to 31st March 2030 is 9,702 homes. Then, Based on NPPF paragraph 78 (a), a 5% buffer is added to ensure choice and competition in the market for land. This gives an overall 5-year requirement of 10,187 homes.
- 3.5 The 5% buffer is appropriate because Greater Norwich passes the Housing Delivery Test, achieving 111% against the [Housing Delivery Test Results published in December 2024](#); and, because the provision under Footnote 40 of paragraph 78b) to address pass under delivery is not triggered.

4. Calculating the Supply of Homes Site-by-Site

- 4.1 To produce this housing land supply assessment the Greater Norwich authorities spent time during April, May and June approaching landowners, agents, and developers for new data about when they intend to bring forward their allocated or permitted sites. Furthermore, projections have been updated, using known completions and progress of planning applications.
- 4.2 Appendices A, B and C to this assessment forecasts 3,931 homes in Broadland, 1,510 homes in Norwich, and 4,447 homes in South Norfolk. Giving a total of 9,888 homes over the 5-year period 1st April 2025 to 31st March 2030.
- 4.3 The bulk of housing supply comes from large sites of 10 or more homes, and for these larger sites common practice is for the developer to provide a delivery forecast. Where delivery forecasts have not been provided then sites have been included based on reasonable assumptions of what could be expected on the site in question. These assumptions are based on past delivery on site, professional

judgement and widely used industry-standard assumptions found in [Lichfields Start to Finished 3](#).

- 4.4 Appendices A, B and C to this land supply assessment forecast 8,727 homes from large sites: 3,643 homes in Broadland, 1,194 homes in Norwich, and 3,890 homes in South Norfolk.
- 4.5 Small sites of fewer than 10 homes are also an important source of housing supply. New homes on smaller sites typically come from sources such as garden plots, barn conversions and other agricultural buildings, conversions of shops, offices and schools, brownfield redevelopment sites, and affordable housing exception sites. Other possibilities, although rarer, include where a new dwelling is created from a certificate of lawfulness, removal of an occupancy restriction, or the sub-division of a dwelling.
- 4.6 To accurately forecast supply from small windfall sites of fewer than 10 homes the Greater Norwich authorities conducted a piece of research to track such permissions through the planning system to completion. The evidence base for the supply of homes from small sites has been reported in previous Annual Monitoring Reports, and for reference purposes is reproduced here at Appendix D.
- 4.7 Although the supply of windfall sites is considered reliable, the Greater Norwich authorities take a prudent approach for forecasting purposes.

Existing sites of 9 dwellings or fewer

- 4.8 Although the definition of 'Deliverable' in the NPPF Glossary would suggest all small sites with existing permission should be considered deliverable unless there is clear evidence to the contrary, the Greater Norwich authorities make an adjustment to apply a blanket 27% discount to ensure no over-estimation of supply from existing permissions of 9 dwellings or fewer.

Future windfall

- 4.9 Adjustments are made for currently unknown windfall sites. This uses an analysis of past windfall permissions, and larger sites in South Norfolk and Broadland have been removed, because the continued supply of such sites is less certain.
- 4.10 The overall level of windfall is then discounted by a similar precautionary 33% as the existing small sites. Lastly, to avoid double-counting of delivery from individual small sites that already have permission windfall supply is applied in a stepped approach across the 5-year land supply. This means windfall is set at 0% in year 1, 33% in year 2, and 66% in year 3. The discounted windfall rate is applied fully in years 4 and 5 on the basis that such schemes have then had sufficient time to gain permission, start on site, and to complete.

Student Accommodation, older peoples housing and residential institutions

- 4.11 Whilst general needs housing forms the vast majority of the 5-year supply, schemes for specialist housing and purpose built student accommodation are

included, because they are legitimate sources of housing supply that have the effect of making available general housing that would otherwise be occupied. However, such units are not directly equivalent to a single dwelling on a 1:1 basis, and so they are counted with a reduced ratio.

- 4.12 Residential institutions are counted at a ratio of 1 home to each 1.8 bedspaces, and for communal student accommodation these are counted at a ratio of 1 home to each 2.85 student bedrooms (unless the student accommodation is provided as studio flats, when it is counted on a 1:1 basis). Details about these calculations are included in Appendix D; but, in summary, the ratio for older peoples housing and residential institutions is in accordance with national guidance and is based on the average number of adults living in households across the Greater Norwich area; and, the ratio for student accommodation is calculated by the average number of students living in student only households in Norwich and represents the amount of accommodation expected to be released into the wider housing market.

5. Housing Land Supply Calculation

- 5.1 Table 1 sets out the Housing Land Supply Calculation as per the requirements of NPPF paragraph 78a). Underneath Table 1 are notes referencing source information.

Table 1: Greater Norwich 5-Year Housing Land Supply Assessment

Row ID	Greater Norwich 5-Year Housing Land Supply Assessment	
a	GNLP housing requirement 2018 to 2038	40,541
b	Total delivery 2018/19 to 2024/25 Completions	15,316
c	Residual housing requirement over plan period to 2038 (13 years) (a-b)	25,225
d	Average Residual annual housing requirement (c/13)	1,940
e	Total 5-year requirement 2025/26 to 2029/30 (d*5)	9,702
f	Annual housing requirement (a/20) with NPPF 5% buffer for choice and competition in the market for land (d*1.05)	2,037
g	Total 5-year requirement 2025/26 to 2029/30 (f*5)	10,187
h	Housing forecast 2025/26 to 2029/30	9,888
i	Shortfall / surplus of housing (h-g)	-299
j	Supply in years (h/f)	4.85

Row a: The housing requirement as at Table 6 of the [GNLP 5. The Strategy \(including policies\) | GNLP](#). The GNLP provides the adopted strategic policies, and basis for calculating the housing requirement.

Row b: Total housing completions over the seven years from 2018/19 to 2024/25.

Row c: The residual housing requirement is calculated by deducting 15,316 from 40,541.

Row d: The residual requirement of 25,225 is divided against the remaining 13 years of plan period (1st April 2025 to 31st March 2038).

Row e: The residual annual requirement of 1,940 homes is multiplied by 5 to give the 5-year requirement.

Row f: The 5% buffer required by NPPF para 78 (a) is applied. Applying a 20% buffer for significant under delivery (para 78 b), reflecting the Greater Norwich authorities performance of 111% against the [Housing Delivery Test Results published in December 2024. Housing Delivery Test: 2023 measurement - GOV.UK. Housing Delivery Test: 2023 measurement - GOV.UK](#)

Row g: The residual annual requirement with a 5% buffer is multiplied by 5 years.

Row h: Appendices to this note give a site-by-site forecast of housing delivery. For the 5-year period 2025/26 to 2029/30, the homes forecast are Broadland 3,931, Norwich City 1,510, and South Norfolk 4,447, totalling 9,888.

Row i: The negative number of -299 homes indicates a shortfall between the forecast delivery and the 5-year requirement. This means that the Greater Norwich area is unable to demonstrate a 5-year housing supply for the period 2025/26 to 2029/30.

Row j: The number of years supply is calculated by dividing the housing forecast 2025/26 to 2029/30 by the annual housing requirement.

6. Nutrient Neutrality

- 6.1 The Greater Norwich Authorities are continuing to act on Nutrient Neutrality so that new development can progress, and this includes setting up the not-for-profit company Norfolk Environmental Credits (NEC). Progress is being made, but the forecast 5-year housing land supply has decreased partly because of this.
- 6.2 Appendix 4 of the GNLP forecasted 12,592 homes between 1st April 2023 to 31st March 2028, but this has declined to 9,888 homes between 1st April 2025 to 31st March 2030. This statement therefore shows a drop in housing land supply of 2,704 homes, or 21% as existing permissions and sites outside the Nutrient Neutrality area have continued to be developed, but likely development on some new allocations and permissions has been delayed.

7. The National Planning Policy Framework (December 2024)

- 7.1 The Government's changes to the NPPF mean that Local Planning Authorities (LPAs) across the country must plan for higher levels of home building. Under the December 2024 NPPF, the housing need figure for Greater Norwich rises by 34%. Using the previous standard methodology set by Government the annual housing need was 1,929 homes, but this rises to 2,590 homes per annum for Greater Norwich.

- 7.2 To address the higher housing requirements, work needs to begin on a review of the GNLP so that it is updated by March 2029. The Government's Planning Practice Guidance being clear that LPAs must review local plans at least once every 5 years so that they remain relevant and effectively address the needs of the local community ([Plan-making - GOV.UK](#) 062 Reference ID: 61-062-20190315).

8. Monitoring in 2025/26

- 8.1 Following this housing land supply assessment, work will re-commence from April 2026 on producing a new annual update of the 5-year housing land supply position. This will take advantage of completions data from 2025/26 and will consider the 5-year forecast for the period 1st April 2026 to 31st March 2031. At this point the Greater Norwich authorities will need to consider the application of the 20% buffer to the Housing Land Supply, as required under NPPF paragraph 78 (c).
- 8.2 The Greater Norwich authorities will contact landowners, agents, and developers from spring 2026 to seek updated forecast information. The intention is to continue the past approach, whereby Joint Delivery Statements for major sites are agreed. A template for the Joint Delivery Statement is available upon request, and the Greater Norwich authorities appreciate the ongoing support of landowners, agents, and developers in forecasting housing land supply.

9. Conclusion

- 9.1 Based on the above the Greater Norwich Authorities are currently unable to demonstrate a 5-year housing land supply with an appropriate buffer to ensure choice and competition in the market for land. As such for determining planning applications in the Greater Norwich area the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the NPPF.

Appendices

Appendix A Broadland Site Forecast

Appendix B Norwich Site Forecast

Appendix C South Norfolk Site Forecast

Appendix D Background Methodology to the 5-year Land Supply Forecast