



Matter 10: Delivering Well Connected, Healthy Communities
ESCO Developments Ltd, Flagship Housing Developments Ltd
and Lovell Partnerships Ltd



**NORTH NORFOLK
LOCAL PLAN
EXAMINATION
HEARING STATEMENT
– MATTER 10**

Quality Assurance

Site name:	North Norfolk Local Plan Examination
Client name:	ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd
Type of report:	Hearing Statement – Matter 10
Prepared by:	Sarah Hornbrook MA (Cantab) MSc MRTPI
Signed	
Date	3 January 2024
Reviewed by:	Iain Hill BSc Hons DipTP MRTPI
Signed	
Date	3 January 2024



1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd (hereafter 'ESCO', 'Flagship', 'Lovell' or collectively, 'the Consortium') in support of representations made to the North Norfolk Local Plan. By way of background, the Consortium are promoting land North West of North Walsham (Site NW62/A) for residential-led development of approximately 1,800 dwellings, 7ha of employment land, community facilities and associated infrastructure.
- 1.2 This Statement provides the Consortium's response to Matter 10 (Delivering Well Connected, Healthy Communities) Question 10.6 the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].

2.0 Matter 10

Question 10.6: In Policy HC4(1a), is it justified to require compliance with infrastructure requirements set out in supplementary planning documents that do not form part of the plan? In 4b, is it justified to require the highest viable level of affordable housing? Should there be a reference to Policy HOU2 which sets out affordable housing requirements? Should 6 state proposals not accompanied by a viability assessment will be required to be policy compliant?

- 2.1 Part 1(a) of Policy HC4 is not justified and should be amended to ensure that aspirations and targets set out within non-statutory Supplementary Planning Documents are not conflated with contributions which are necessary to make a development proposal acceptable, as set out in Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010.
- 2.2 Moreover, as stated in the Consortium's response to the Regulation 19 consultation, infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council's Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the District. To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with paragraph 35(c) of the NPPF, the policy should be revisited to omit this list.
- 2.3 With regard to 4b, it is not justified to require proposals to provide the highest level of affordable housing, given it is inconsistent with other policies of the draft Local Plan, notably Policy HOU2. To ensure the policy represents an appropriate strategy and provides clarity and certainty, it should cross reference the requirements of Policy HOU2, which relates to affordable housing provision.



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