

# North Norfolk Local Plan Examination Hearing Statement – Matter 10

**Boyer**

## Report Control

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## 1. INTRODUCTION

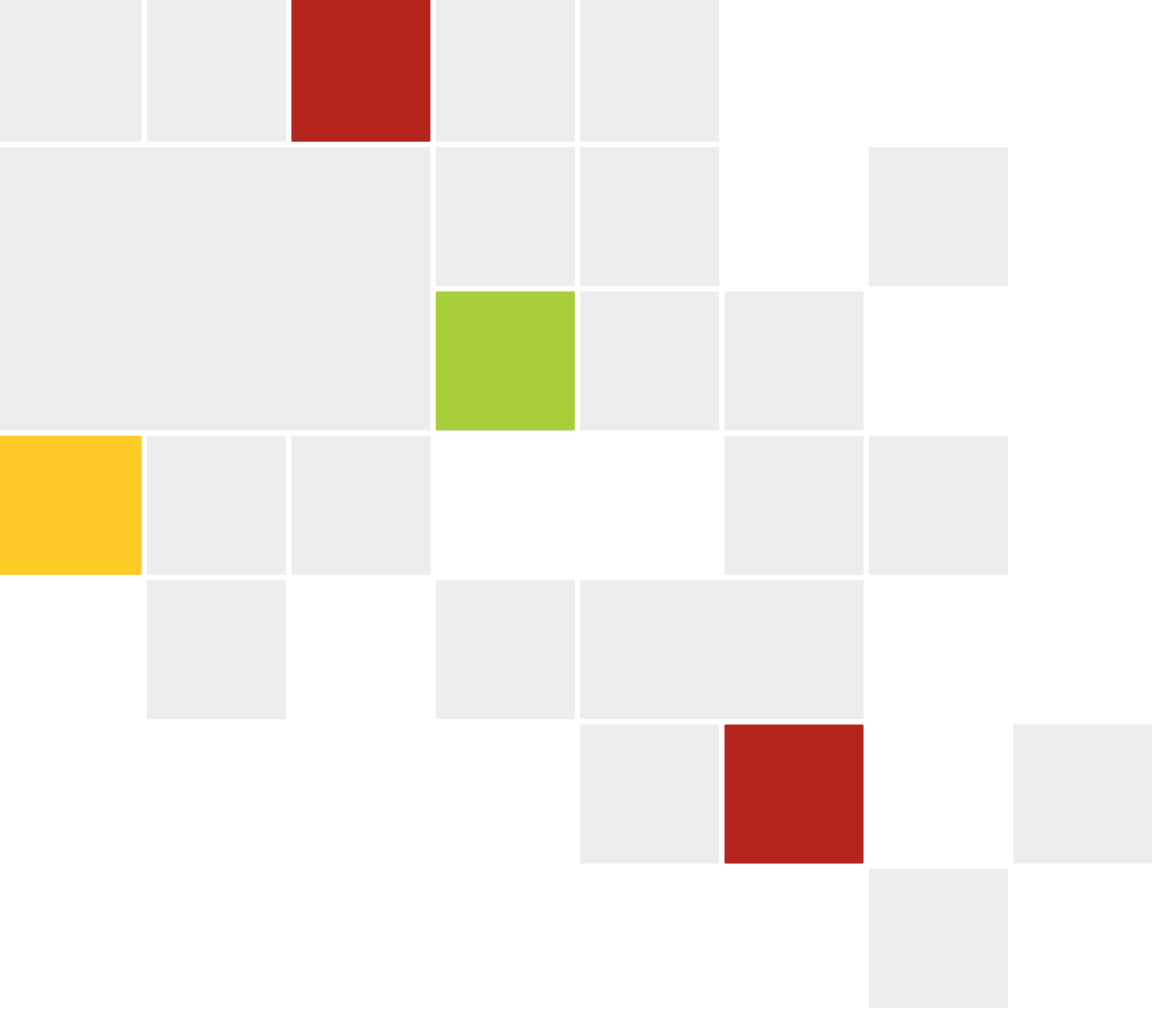
- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Richborough in response to the Inspectors' Matters, Issues and Questions in relation to Matter 10 (HC Policies including Viability) of the North Norfolk Local Plan Examination.
- 1.2 Boyer have been appointed by Richborough to act on their behalf in respect of promoting land interests at Land End of Mundesley / Land at Paston Gateway (HELAA ref: NW16/1) for residential development.
- 1.3 Boyer have previously made representations to the Regulation 19 Local Plan consultation (March 2022) and our Hearing Statement should be read in conjunction with those representations.

## 2. QUESTION 10.7 – PLAN WIDE VIABILITY ASSESSMENT

**10.7 Does the Plan Wide Viability Assessment (Document I11) properly assess the impact of the policies of the plan on the economic viability of development so as to not undermine the deliverability of the plan? (NPPF paragraph 34) Does it properly assess the costs of development including affordable housing, biodiversity net gain, energy efficient standards, accessible & adaptable homes, minimum space standards, electric vehicle charging and digital infrastructure?**

- 2.1 We do not consider that the Plan Wide Viability Assessment 2022 (Examination Library Document Reference I11) does not properly assess the impact of policies within the plan. This is specifically in relation to the viability of the North Walsham SUE proposed in Policy NW62 and as we set out in our statement for Matter 5.
- 2.2 Paragraph 6.12 of the Viability Assessment 2022 sets out that: *'The purpose of the study is to determine whether the development strategy proposed by the Plan is deliverable given the policy cost impacts of the Plan and, secondly, whether it is viable in principle to introduce a Community Infrastructure Levy Charging Schedule.'*
- 2.3 There is no requirement within the NPPF or NPPG to consider as part of the plan making exercise whether it is viable to introduce a CIL charge, which appears to be the focus for much of the Viability Assessment.
- 2.4 The purpose of the Viability Assessment process as set out in paragraph 039 of the NPPG is to ensure that policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable.
- 2.5 We consider that the Viability Assessment does not fully assess the level of infrastructure and contributions that would be required under Policy NW62 to enable the delivery of the SUE. Given the importance of the SUE to the Council's overall spatial strategy and housing delivery from the plan we would suggest that the Viability Assessment from 2022 should have fully explored the latest infrastructure requirements, up-to-date costings and establish that what is sought under Policy NW62 is viable to deliver.
- 2.6 This is particularly important given that the 2018 Viability Assessment, which did look at the potential abnormal costs from the North Walsham SUE, concluded that it would not be deliverable without deduction from the land purchase price.
- 2.7 In a normal residual method of valuation, this would present a scenario that would be classed as unviable as a landowner would be accepting a return significantly below market value. Ordinarily in such scenarios either the land would not be brought forward for development, or a landowner may wait for house prices and land values to rise to be able to make a viable return. All of which poses a potential significant impact to the deliverability of a site and the timeframes for when a development may come forward.

- 2.8 In the case of Policy NW62 and the North Walsham SUE, the policy requirements for the delivery of infrastructure, could make the site and therefore the plan undeliverable without being fully assessed in an up-to-date viability assessment.
- 2.9 In accordance with Paragraph 34 of the NPPF, we consider that to make the plan sound, a revised viability assessment should be carried out to fully take into consideration the effects of the policies and allocations on the infrastructure of the district. Otherwise, there is the risk that the policies within the emerging Local Plan could impact the deliverability of the plan and the supply of housing.



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