

Home Builders Federation

Matter 10

NORTH NORFOLK LOCAL PLAN EXAMINATION

Matter 10: Delivering Well Connected, Healthy Communities (HC policies)

Issue: Whether the policies to deliver well connected, healthy communities are positively prepared, justified, effective and consistent with national policy.

10.2 Does Policy HC1 need to be clarified for effectiveness? Is a reduction in the threshold for an HIA to 250 dwellings justified? Should there be a threshold for non-allocated sites to be justified? In (1), how do the two sentences relate together? In (2), how is 'major development' defined?

The HBF did not comment on HC1 but would not consider a reduction in the threshold to 250 dwellings to be justified.

10.3 Should Policy HC2 refer to the definition of major development in the NPPF rather than developments of 11 or more dwellings/1000 sq m? Are the open space requirements in Appendix 2 and Table 3 justified? How would financial contributions to off-site open space be calculated?

No comment.

10.4 Is all the land designated as open/green land on the policies map and thus within the scope of Policy HC2(4&5) justified? Areas subject to objection include land at The Pastures, Blakeney, land at Hempstead Road & A148 Holt, land at Sheringham House and land off Warren Road, High Kelling. Are any other sites the subject of objection? Can the Council provide plans of these sites. Is the wording of sections 4 & 5` justified and effective?



No comment

10.5 Is the wording of Policy HC3 justified and effective? In Policy HC3(2b), should criteria (a) and (c) be combined for clarity and thus effectiveness? Should criterion (b) be strengthened to demonstrate alternative modes of operation are not viable? Is it justified for the footnote to require marketing to comply with best practice guidance that does not form part of the plan?

No comment

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?

No comment

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?

As set out in our statements on matter 4 the Council have published an updated viability assessment following the regulation 19 consultation which includes those policy costs that were missing from the earlier assessment. The only consideration not undertaken in the study is the impact of the Future Homes Standard that is expected to be introduced in 2025. The Government have recently announced a further consultation on these standards and whilst the final detail is not known some degree of sensitivity testing is necessary to ensure that development remains viable and deliverable across the plan period.

10.8 Is the requirement for a Digital Infrastructure Connectivity Plan in paragraph 5.5.3 to assess compliance with Policies HC5 and HC6 justified for all proposals over 100 sq m?

No comment.

10.9 Is it justified for Policy HC7(4) to require compliance with the North Norfolk Design Guide when this does not form part of the plan?

No comment.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E