
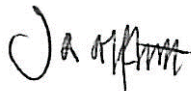


**NORTH NORFOLK
LOCAL PLAN
EXAMINATION
HEARING STATEMENT
– MATTER 7**

Quality Assurance

Site name: North Norfolk Local Plan Examination
Client name: Hopkins Homes Ltd
Type of report: Hearing Statement – Matter 7

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Signed 
Date 5 January 2024

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Date 5 January 2024



1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of Hopkins Homes Ltd in support of representations made to the North Norfolk Local Plan. By way of background, Hopkins Homes are promoting land at Norwich Road and Nursery Drive (NW01/B) for residential-led development of 343 dwellings, and associated infrastructure.
- 1.2 At the time of writing this Statement, hybrid planning applications are at an advanced stage of determination covering both the allocated land under the existing Local Plan, and the proposed allocation of the submitted North Norfolk Local Plan.
- 1.3 The applications are registered under planning references: PF/22/1596 and PF/22/1784 and form a hybrid planning application comprising of the following elements:
1. Full Planning Application for the construction of 343 dwellings (including affordable homes), garages, parking, vehicular access onto Ewing Road and Hornbeam Road, public open spaces, play areas, landscaping, drainage and other associated infrastructure;
 2. Outline Planning Application with all matters reserved for a phased development comprising 7 serviced self-build plots and associated infrastructure; and
 3. Outline Planning Application with all matters reserved for the construction of an elderly care facility and associated infrastructure, landscaping and open space.
- 1.4 This Statement provides Hopkins Homes Ltd's response to Matter 7 (Housing Trajectory, Five Year Supply & HOU Policies 3,4,6-9), Questions 7.3, 7.5 and 7.7 of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].

2.0 Matter 7

Question 7.3: Are these HOU policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so, what should these be?

- 2.1 As per our response to Question 4.9, Hopkins Homes Ltd contends that prescribing the private market mix on a development site through planning policy, as intended in Policy HOU1, is not conducive to enabling applicants to amend their development proposals to meet market demands and local needs providing sufficient flexibility to be responsive to changing circumstances across the plan period.
- 2.2 Furthermore, this policy approach will not be effective over the plan period, as a 15–20-year plan period, there can be a lot of fluctuations in local housing need, and market demand. It is more appropriate for the housing developers promoting sites who are much closer to the volatility of the housing market and what demand and supply is at the time of progressing development proposals to provide a more informed basis on which private housing mix has been devised.
- 2.3 Such a policy approach, Hopkins Homes would also consider is not consistent with the Framework, specifically para 60 and 62. Whilst it is acknowledged that planning policies should reflect the size, type and tenure of housing needed for different groups (para 62), providing such a prescriptive approach to market housing mix for the duration of the plan period, does not fulfil the ability under para 60 to significantly boost the supply of homes, and specifically homes which are being demanded/required by the local housing market. The policy, as drafted, does not provide sufficient flexibility to adapt to changing circumstances.

Question 7.5 – Should Policy HOU6 (and others) insist on compliance with the North Norfolk Design Guide when this does not form part of the plan?

- 2.4 Hopkins Homes contends that Policy HOU6, as proposed, is not justified or effective in relation to the tests of soundness, set out in paragraph 35 of the NPPF.
- 2.5 Paragraph 129 of the NPPF provides that design guides and codes should be produced either as part of a plan or as supplementary planning documents. At the time of writing, it is understood that the Council is in the process of updating its 2008 Design Guide. Given the infancy of the revised Design Guide, the emerging Local Plan does not recognise it as a statutory part of the Plan. Therefore, Policy HOU6 should not require compliance with the North Norfolk Design Guide, and Part 1. B. of the Policy should be reworded as follows:
- a. would not materially increase the impact of the dwelling on the appearance of the surrounding area; and,*
 - b. would comply with the provisions of Policy ENV8 ‘High Quality Design’ ~~and the North Norfolk Design Guide.~~*
- 2.6 An explanatory sentence should be added to Policy HOU6 to encourage compliance with the Design Guide, though the policy must explicitly treat the Guide as a supplementary planning document, and should not imply that it forms part of the Development Plan. The 2008 Design Guide is a SPD to the current plan, so will not have any status to this new plan, so it will form be a material consideration until revised as an updated SPD.

Question 7.7 – Are Policies HOU8 and HOU9 justified in relation to the evidence and their effect on development viability? In Policy HOU8(2), do both criteria have to be met or just one? In Policy HOU9, should a sentence to address possible exemptions be included as in Policy HOU8?

- 2.7 Hopkins Homes Ltd submitted representations at Regulation 19 stage of the Plan challenging the soundness of this approach. Whilst Hopkins Homes Ltd are supportive of the delivery of accessible and adaptable homes, with 100% of all properties proposed as part of application ref: PF/22/1596 and PF/22/1784 achieving M4(2) compliance, the emerging policy requirement to achieve 100% compliance with Nationally Described Space Standards (NDSS) across all properties is not considered to be justified by evidence within the Local Plan Evidence Base, thereby causing conflict with Paragraph 35(b) of the NPPF.
- 2.8 Also, no analysis has been undertaken as part of the Evidence Base to understand whether the delivery of 100% NDSS compliant properties in North Norfolk to levels identified in the draft policy is deliverable/viable, thereby raising potential conflict with Paragraph 35(b) of the NPPF.
- 2.9 It is suggested that the requirement for all new dwellings to meet NDSS should be revisited to ensure the deliverability and effectiveness of the policy, in accordance with Paragraphs 35(b) and (c) of the NPPF, and that the delivery of housing development in the District in the plan period is not delayed or burdened by additional layers of viability review to justify a departure from providing 100% NDSS provision. As the Inspector has suggested, a sentence should be added to Policy HOU9 to address exemptions. We suggest the following wording:

Any departure from the application of Nationally Described Space Standards must be robustly justified as part of a planning application.



BIDWELLS