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Matter 4: Delivering the Right Mix of Housing Policy (HOU2)  
ESCO Developments Ltd, Flagship Housing Developments Ltd  
and Lovell Partnerships Ltd



**NORTH NORFOLK  
LOCAL PLAN  
EXAMINATION  
HEARING STATEMENT  
– MATTER 4**

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# Quality Assurance

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| <b>Site name:</b>      | North Norfolk Local Plan Examination   |
| <b>Client name:</b>    | ESCO Developments Ltd, Flagship Housing Developments Ltd and Lovell Partnerships Ltd |
| <b>Type of report:</b> | Hearing Statement – Matter 4   |
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| <b>Signed</b>          |     |
| <b>Date</b>            | 3 January 2024   |
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| <b>Signed</b>          |     |
| <b>Date</b>            | 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 4 (Delivering the Right Mix of Housing (Policy HOU2), of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003]).

## 2.0 Matter 4: Delivering the Right Mix of Housing

***Question 4.9 – Is the required market housing mix on sites of 6 or more dwellings – not less than 50% two- or three-bedroom properties in a mix comprising approx. 20% two-bed and 80% three-bed – justified by evidence of local need and has its effect on viability been properly assessed? Does this allow sufficient flexibility to meet locally specific needs?***

- 2.1 Based upon the evidence provided by the Council, the approach taken in prescribing the private housing mix is not justified. The proposed policy approach does not appear to be based upon local housing need and in particular does not reflect the fact that this can vary significantly across the District, and can often be area/settlement specific and subject to change over the duration of the plan period.
- 2.2 As currently drafted, this policy has insufficient flexibility in its approach to be responsive to changes in circumstances that may occur over the plan period and accordingly it is considered that it will not be effective.
- 2.3 The Consortium are also of the view that the proposed policy is not consistent with the NPPF, specifically paragraphs 60 and 63. Whilst it is acknowledged that planning policies should reflect the size, type and tenure of housing needed for different groups (para 63), 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 demanded/required by the local housing market.
- 2.4 It is considered more appropriate for housing developers delivering sites, who are much closer to the housing market and what demand and supply is at the time of an application, to provide a more informed assessment of housing mix.
- 2.5 On this basis, we suggest that the policy is amended to state that the applications will need to be supported by evidence of local need and demand to justify the proposed mix of market housing.

**Question 4.11 – Is the requirement on sites of 151 dwellings or more for a minimum of 60 specialist elderly/care units and 40 units for each additional 250 dwellings thereafter justified by evidence of local need and has its effect on viability been properly assessed? Are these sized schemes appropriate, does this allow sufficient flexibility to meet locally specific needs and would the sites be appropriately located in all cases? Has this policy been carried through consistently in the proposed allocations in the plan? How would Class 2 residential care homes be assessed in terms of units?**

- 2.6 The Consortium submitted representations at Regulation 19 stage of the Plan challenging the soundness of this approach. Whilst the Consortium are supportive of the delivery of specialist elderly / care provision in North Norfolk, this policy requirement is not justified by evidence, with the Strategic Housing Market Assessment (2019) and Housing Stock Modelling Report (2021) explicitly excluding care provision from its assessment of housing need. This element of HOU2 is therefore considered a departure from paragraph 35(b) of the NPPF, as the policy approach to delivering care accommodation is not justified by evidence.
- 2.7 Whilst the Consortium have allowed for the provision of specialist accommodation within both the Development Brief and Viability Assessment prepared in support of Policy NW62/A, reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation. This is suggested to ensure compliance with paragraphs 35(b) and 35(c) of the NPPF by removing an unjustified and ineffective element from Policy HOU2.
- 2.8 As referenced in our Regulation 19 submissions, by way of comparison, the emerging Greater Norwich Local Plan captures elderly / care provision within its wider housing policy and provides support for such development without prescribing delivery thresholds. In the absence of evidence to justify delivery thresholds for on-site care provision, it is therefore suggested that the North Norfolk Local Plan follows a similar approach.
- 2.9 The Consortium do have concerns around the indirect consequence of the Council's policy approach. Based upon the draft policy, there is a risk that an arbitrary threshold which triggers the requirement for elderly/care units to be provided within a development could result in certain settlements, such as North Walsham (which is taking a significant proportion of the District's housing requirement through the plan period), having an oversupply of specialist housing, far in excess of local need, and negatively impacting viability and delivery. Conversely, this would mean that areas of the District without significant housing allocations, but still in need of access to elderly/care units, do not see the delivery of specialist accommodation.
- 2.10 It is suggested that a more appropriate response would be to require major housing developments (i.e. over 151 dwellings) to provide a proportion of specialist/elderly persons accommodation, based on a site specific local market needs assessment prepared at the time of an application. Such an approach would be considered sound, on the basis that it would: be justified by up-to-date evidence of local need; be effective in delivering a scale of accommodation that is needed and commercially viable; and, is consistent with national policy by providing a mechanism which meets the requirements of paragraph 63 of the Framework.



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