

## Written Statement submitted by Lawson Planning Partnership Ltd on behalf of White Lodge (Norwich) Ltd in Response to Matter 4: Delivering the Right Mix of Housing

### Introduction

1. On behalf of our client, White Lodge (Norwich) Ltd, owners of land at the Former Four Seasons Nursery, High Kelling, we set out below our response to questions raised by the Inspector in relation to Matter 4: Delivering the Right Mix of Housing. The responses below build on our representations to the consultation on the Pre-Submission Draft Local Plan, dated 1<sup>st</sup> March 2022, and are informed by a review of the Plan Wide Viability Assessment (Ref: I11), dated September 2022. They also take into account the updated National Planning Policy Framework (NPPF), published on 19<sup>th</sup> December 2023.

### Question 4.2: Is the proposal for 15% of dwellings on qualifying sites to be affordable in housing zone 1 and 35% in housing zone 2 justified by the evidence, and has the effect on viability been properly assessed?

2. Within our representations to the Regulation 19 consultation on the draft Local Plan, we raised an objection to draft Policy HOU2 on the grounds that the specified mix for sites of 6-25 dwellings, when applied to sites in Small Growth Villages, is not based on proportional evidence and, therefore, is not justified.
3. In addition, it was highlighted that the assumptions made on developer profit in the 2018 Viability Assessment were based on the Council's previous approach whereby sites in Small Growth Villages would be allocated through Part 2 of the Plan, rather than the current approach to consider proposals according to their position relative to the defined settlement boundary, along with other policy criteria.
4. Furthermore, the scenarios used within the Assessment that most closely relate to Small Growth Villages (Village Edge and Village Infill) were not considered to be realistic in terms of the number of units likely to be accommodated. In respect of High Kelling, sites within the settlement boundary are limited and, if it does come forward, infill development is likely to comprise much lower unit numbers.
5. In order for the Policy and the Plan to be found 'sound', it was suggested that a separate viability assessment should be undertaken to examine the effect of compliance with draft Policy SS1 on sites in Small Growth Villages, to ensure the Plan is justified and effective in meeting the identified housing need, including affordable housing, on a District level.
6. The updated Plan Wide Viability Assessment (September 2022) does not include a separate viability study or include scenarios where the Small Growth Village policy would apply. In addition, it does not clarify whether the assumptions on developer profit have been updated to take account of the change in policy approach within the draft Local Plan. Therefore, it is not possible to determine whether the effect of this approach on viability has been properly assessed.
7. The Assessment states that the Policy impacts that have been taken into account are accessibility standards, biodiversity net gain, nutrient neutrality, water conservation standards, electric vehicle

charging and space standards. Therefore, it would appear that the impact of compliance with the draft Policy SS1 requirements in relation to sites in Small Growth Villages has not been accounted for.

8. It is noted that the updated Viability Assessment is based on a Valuation Study undertaken by HEB in July 2022. However, as a copy of this Assessment does not appear to have been made available as part of the Examination Library, it has not been possible to determine whether the valuation data is reflective of current values, which are likely to have changed in the last 18 months. This is borne out by the UK House Price Index data for England which show that the average house price in North Norfolk District rose by £1,704 between July 2022 and September 2023.
9. Similarly, the Assessment is based on BCIS construction cost data from January 2022. Given that the Assessment is dated September 2022, it is considered that more up-to-date data could have been used. For example, according to the Department for Business and Trade's 'Monthly Statistics of Building Materials and Components' (5<sup>th</sup> July 2023), the material price index for 'All Work' increased by 1.5% in May 2023 compared to the same month the previous year.
10. The Village Edge and Village Infill development scenarios used to inform the Assessment have not been updated in the current version and, therefore, it remains unrepresentative of likely developments in Small Growth Villages.
11. In light of the above, we wish to maintain our **objection** on the grounds that draft Policy HOU2 does not meet the soundness tests set out at Paragraph 35 of the NPPF as they would not be justified or effective in meeting the identified housing need within Small Growth Villages.

*Lawson Planning Partnership Ltd, 4<sup>th</sup> January 2024*