



## **MATTER 3 HEARING STATEMENT**

### **North Norfolk Local Plan Examination**

On behalf of:  
**D L Ritchie Will Trust**

Date:  
**January 2024**

Document Reference:  
**GA/DJ/01320/S0003**

## 1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client, D L Ritchie Will Trust, in response to the Matters, Issues and Questions for the North Norfolk Local Plan Examination. It is intended to assist the Inspector's consideration of the soundness of the Plan and will form the basis of our points for discussion at the examination hearing session. We have responded to questions 3.4, 3.5, 3.6, 3.9, 3.10 and 3.12 that relate to our client's representations to the regulation 19 Local Plan.

## 2.0 MATTER 3. DELIVERING SUFFICIENT HOMES (POLICY HOU1)

### Question 3.4

**Should the standard method based on 2014 based household projections and the affordability uplift at the publication of the submission version of the plan be used, giving 531 dpa or 10,610 dwellings over a 20 year plan period? Should a more recent affordability uplift figure be used? Should the ratio to be published in March 2024 be taken into account? What are the likely future trends in relation to house prices and average earnings locally?**

- 2.1 Planning practice guidance states that Local Housing Need (LHN) calculated using the standard method should be calculated at the start of the plan period but kept under review as it may change. It states that it may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination. The Regulation 19 Proposed Submission Version Local Plan was published for consultation in January 2022 which is now almost 2 years ago, but the plan was not submitted for examination until May 2023. At the time of publication the 2020 affordability ratio was 9.14, but it has now increased to 10.64 with the 2022 affordability ratio.
- 2.2 One would normally expect a far shorter period between Regulation 19 consultation and the submission of the plan and it is therefore normally appropriate to rely on the LHN figure in the submitted plan for 2 years. However, the submitted plan's LHN calculation dates from January 2022 and it does not follow the standard method in any event as it is based on the 2016-based projections. In this context, we consider that Local Housing Need should be calculated at the date of submission:

*Table 1. Local Housing Need Calculated Using 2014 Household Projections with 2022 Affordability Ratio*

2014 based household projections 2023	50,709
2014 based household projections 2033	54,672
Increase in households 2021-2031	3,963

Annual projected household increase	396
Affordability Ratio 2022	10.64
Standard methodology adjustment factor	1.415
Annual Projected Increase x conversion factor	560
Cap at the higher of 40% above either projected household growth of 396 (+ 40% = 554) or Core strategy housing requirement of 400 (+ 40% = 560)	No cap
<b>Local Housing Need</b>	<b>560</b>

**Question 3.5**

**How much weight, if any, should be given to the reasoning behind Section 78 appeal decisions which support the Council’s approach? Which decisions are relevant?**

2.3 We consider that the Inspector should consider the evidence submitted to the Local Plan examination on its own merits and reach an independent conclusion. It is not clear what level of detail or assessment was undertaken in the referenced appeal decisions and as such we consider that they should be afforded limited weight.

**Question 3.6**

**If there are exceptional circumstances justifying use of a non-standard approach, should the 2018 based projections be used as more up to date than the 2016 based projections? What should the dpa figure be then? If the 2016 rather than 2018 based projections are to be used, what would be the justification for this?**

2.4 If the Inspector finds that there are exceptional circumstances, then we consider that the most the most up-to-date projections should be used. In this respect the 2018-based projections should be used with the 2022 affordability ratio which we calculated below as resulting in a housing need of 587 dpa.

*Table 2. Local Housing Need Calculated Using 2018 Household Projections with 2022 Affordability Ratio*

2018 based household projections 2023	50,104
2014 based household projections 2033	54,289
Increase in households 2021-2031	4,185
Annual projected household increase	419
Affordability Ratio 2022	10.64
Standard methodology adjustment factor	1.415

Annual Projected Increase x conversion factor	593
Cap at the higher of 40% above either projected household growth of 419 (+ 40% = 587) or Core strategy housing requirement of 400 (+ 40% = 560)	Yes – cap at 587
<b>Local Housing Need</b>	<b>587</b>

**Question 3.9**

**Given the local housing need figure for the plan period, however assessed, what level of housing provision should be made in the plan to take account of unforeseen circumstances such as allocations or planning permissions not being implemented, or completions on allocated sites being slower than currently anticipated? On the basis of the Council’s local housing need figure of 9,600 dwellings, is the provision of 10,968 dwellings for 2016-36 or 10,633 for 2020-40 appropriate? (Updated HOU1 figures in EX006)**

2.5 As set out in our previous representations, we would expect a supply buffer of approximately 20% as a way of ensuring that the housing requirement is deliverable and that a robust 5 year housing land supply can be maintained. The figures referred to above would represent a 14% buffer for 2016-2036 and a 11% buffer for 2020-2040. We consider that these figures are too low. This is especially true in the context of the new NPPF (December 2023) which at paragraph 76 removes the requirement for Local Authorities to demonstrate a 5 year supply of housing annually if their local plan is less than 5 years old and if it identified a 5 year supply at examination. In this respect, whilst the Local Plan is to be examined against the requirements of the previous NPPF (September 2023), the new NPPF is now a material consideration in determining planning applications. There is therefore an increased need for local plan Inspectors to ensure the deliverability of housing trajectories set out in local plans as they will not be reviewed again for 5 years. To ensure robust delivery to meet housing requirements, we consider that a 20% supply side buffer is appropriate.

**Question 3.10**

**Given the updated monitoring figures in EX006, if the local housing need is assessed as 10,610 dwellings or some other figure, what level of provision would be appropriate for 2016-36 or 2020-40?**

2.6 We consider the Council’s Local Housing Need to be 560 dwellings per annum (using 2014-based projections and 2022 affordability ratio). This gives a 20 year requirement of 11,200 dwellings. A 20% supply side buffer on this requirement would indicate an appropriate level of provision of 13,440 dwellings.

**Question 3.12**

**How has the contribution of future windfall sites been calculated? What is the evidence for the past level of delivery from windfall sites? Should the past contribution be discounted by 50% (paragraph 7.1.7) or some other figure? Why?**

- 2.7 The only comment we have on windfall sites is that the trajectory contained in the Five Year Housing Land Supply 2023 to 2028 statement (Ref: EX007) includes both significant windfall delivery and delivery from small sites with planning permission in years 2 and 3 of the supply. We would normally expect forecast windfall delivery to be removed from the first 3 years of the 5 year period to avoid double counting with existing windfall sites (i.e. small sites that already have planning permission) that are still being built out.