


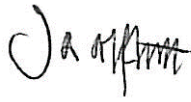
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Matter 5: Places and Housing Sites, Issue 5.6 – North Walsham
Hopkins Homes Limited



**NORTH NORFOLK
LOCAL PLAN
EXAMINATION
HEARING STATEMENT
– MATTER 5**

Quality Assurance

Site name:	North Norfolk Local Plan Examination
Client name:	Hopkins Homes Ltd
Type of report:	Hearing Statement – Matter 5
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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 Ltd 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 5 (Placing and Housing Sites), Issue 5.6 (North Walsham) of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].

2.0 Matter 5, Issue 5.6 – North Walsham

Question 5.6.2 - Are the housing allocations for North Walsham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 2.1 Hopkins Homes Ltd made representations at the Regulation 19 stage of the Plan, challenging and requesting, on the basis of soundness, changes to the proposed policy wording of site allocation NW01/B. This Statement is not intended to repeat these representations, on the basis it remains our assumption that the Examining Inspector will have equal regard to representations duly made at the Regulation 19 stage.
- 2.2 To meet the soundness requirements of the NPPF, set out in paragraph 35, it is not necessary for the allocations to be “the most appropriate” (our emphasis added), rather, it is necessary to demonstrate that they are “an appropriate” strategy, taking into account the reasonable alternatives and based upon proportionate evidence.
- 2.3 In this regard, it is considered that the allocation of site NW01/B is an appropriate strategy, when considered against the reasonable alternatives, including the alternative sites which are set out in document D3, “Site Assessment Booklet (Regulation 19): North Walsham”.
- 2.4 Paragraph 73 of the NPPF recognises that, “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).” In order to meet the district’s projected housing needs, the Council have followed this guidance and sought suitable locations for larger scale development in the form of extensions to the existing settlement of North Walsham. Large parts of the district are constrained by environmental and landscape designations, including the Norfolk Coast AONB and/or proximity to the Norfolk Broads National Park, and internationally designated nature sites. North Walsham is not impacted in this way, and as the largest town in the district, is an eminently suitable location for growth. Consequently, it follows that it is entirely appropriate to seek to allocate a residential led development site such as NW01/B adjacent to the town.
- 2.5 There are no other sites available that could accommodate the quantum of development proposed with fewer impacts.
- 2.6 In light of the above, it is clear that the proposed allocation of site NW01/B is an entirely appropriate strategy, taking into account the reasonable alternatives, and is therefore justified in accordance with the definition set out in the NPPF.

Question 5.6.4(a) - Has the site been allocated previously or is it a new allocation?

- 2.7 Part of the allocation site is already allocated for a mixed-use development comprising 400 dwellings under Policy NW01 of the current adopted Local Plan.

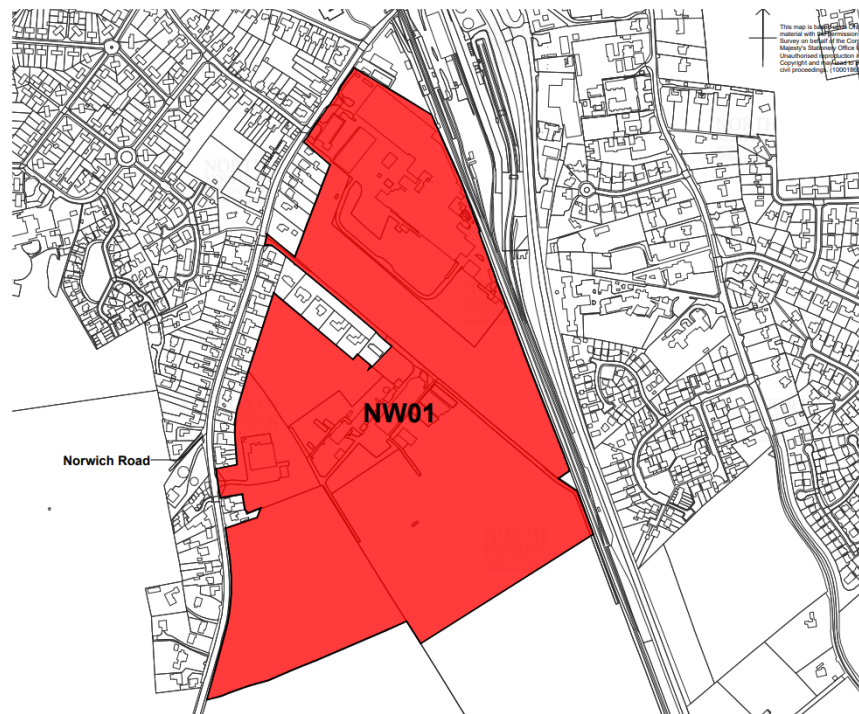


Figure 1: Extent of Policy NW01

- 2.8 The eastern element of the existing site allocation was constructed by Hopkins Homes Ltd, in accordance with planning permission ref: PF/13/0866, delivering 176 dwellings, public open space and a car park to serve the rail station.
- 2.9 The eastern element of the existing site allocation was constructed by Persimmon Homes, in accordance with planning permission ref: PF/15/1010, delivering 100 dwellings and 0.89ha of land for commercial uses.
- 2.10 The central section of the existing site allocation forms part of the proposed allocation section. This section of NW01, combined with additional land to the south, is captured within emerging policy NW01/B.

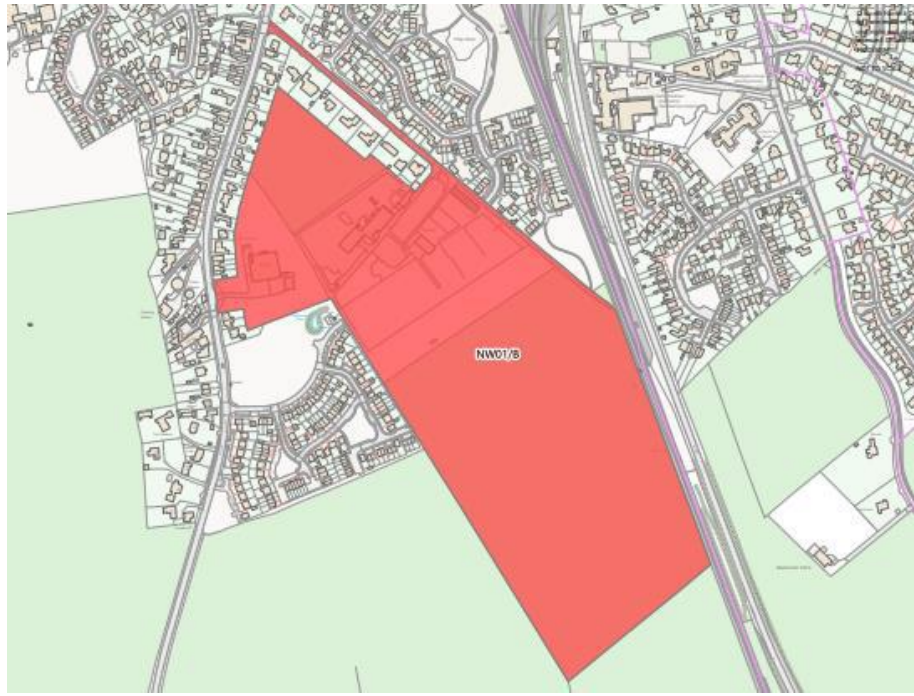


Figure 2: Extent of emerging Policy NW01/B

- 2.11 The total site area measures 18.62ha, while the application site (PF/22/1596 and PF/22/1784) measures 15.65ha in area. It is important to note that the variation in application site area versus allocation area, is as a result of the existing retained employment uses, i.e. North Walsham Garden Centre and Ladbrook UK are excluded from the planning application boundaries.

Question 5.6.4(b) - Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 2.12 At the time of writing this Statement, the site does not have planning permission for the development envisaged within the allocation. However, planning application ref: PF/22/1596 was submitted on 30 June 2022 and is at an advanced stage of determination. The Applicant, Hopkins Homes Ltd and their project team have worked with the Local Planning Authority during pre-app and determination to deliver a scheme which is currently programmed to be presented to the Council's Planning Applications Committee in early 2024, with an officer recommendation for approval.
- 2.13 Hopkins Homes Ltd will be available to provide an update on the outcome of this Committee and their commitment to deliver this proposed allocation at the Matter 5 hearing sessions.

Question 5.6.4(c) - Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

- 2.14 With the benefit of a planning application process progressing in parallel with the Local Plan process, it has been possible for consultees and the LPA to scrutinise the detail related to the delivery of development on this site. The parameters set by Policy NW01/B have been achieved with the current application, whilst also having regard to other emerging policies of the Local Plan. The scheme, as submitted, complies with the emerging Development Plan as a whole.
- 2.15 Of the site-specific requirements identified by Policy NW01/B, these are met by the current applications in the following ways:
1. The development spine road is proposed to link the proposed development with the recent developments to the east and west of the site;
 2. Approximately 3.8 hectares of high-quality open space is proposed as part of the development;
 3. The existing businesses and employment land will be retained and enhanced through provision of a more suitable access point to the south, from the proposed spine road;
 4. An offset of no less than 6m has been proposed between proposed built development and the rear boundaries of existing properties on Norwich Road and Nursery Drive, with a landscaping buffer providing further separation from those properties on Nursery Drive;
 5. A Transport Assessment has been undertaken and, following review by the Highway Authority, a proportionate s.106 contribution has been requested to contribute towards planned works to the A149/B1150 junction, which has been accepted by the Local Highway Authority. The Highway Authority has concurred that the site is in a highly sustainable location;
 6. The proposed surface water drainage strategy has been reviewed in detail with the Lead Local Flood Authority, and the latest iteration addresses those minor outstanding points raised by the LLFA in its latest consultation response dated 30 March 2023;
 7. Necessary enhancement to the sewerage system will be undertaken by Anglian Water prior to occupation of the development, in accordance with their consultation response dated 1 August 2022;
 8. GIRAMS contributions will be captured within a S106 Agreement, and deemed viable for the development to provide; and
 9. A comprehensive development, which aligns with all aspects of the emerging Local Plan, will be delivered in a timely manner to secure the delivery of a key allocation. The Applicant has partnered with an operator to facilitate the delivery of a care-home at the site to align with local needs.
- 2.16 In regards to site specific requirements, and the reference to prescribing the quantum of specialist elderly persons accommodation, Hopkins Homes Ltd has previously challenged through the Regulation 19 stage of the Plan. Hopkins Homes contends that such prescription over scale of this provision to be delivered on this site is not either justified or effective for the following reasons:
- The provision identified by the Council is not justified as it is not based upon sufficient credible evidence to demonstrate the need for such a scale of provision, particularly when considered in combination with other developments identified for the same settlement. As outlined above, Hopkins Homes Ltd have identified Kingsley Healthcare to deliver the elderly care element of the proposed development site. The current application seeks this element in outline. Kingsley

Healthcare have a wealth of experience of delivering such accommodation across the UK, including specific focus on North Norfolk, having just completed a scheme in Holt.

- The advice received, is that there is insufficient need for 100 units in the catchment of North Walsham, but instead a care facility of circa 60-70 units would be more appropriate.
- With this in mind, given the lack of evidence and Council's lack of commercial awareness of what the market would realistically deliver, it is reasonable to conclude that there will not be a reasonable prospect of 100 units of elderly care accommodation being delivered on this site in the plan period and, therefore, it is argued that this policy approach is not effective.

2.17

We therefore request that the policy is amended to delete reference to the scale of specialist elderly persons accommodation to be provided from this site. It is on this basis that the current application has progressed, and the District Council's Housing Strategy team have raised no objection to this approach. With a healthcare provider already partnered with the developer, subject to securing planning permission, there is a real prospect of delivery, but on a scale which is commercially and operationally viable for the healthcare provider. This will also be of a scale which aligns with local need, when considered in combination with those other schemes that will deliver similar provision under this policy approach.

Question 5.6.4(d) - Have the impacts and effects of development been properly taken into account?

- 2.18 The impacts and effects of the development have been properly taken into account. The site has been through a thorough assessment process with the preparation of a suite of technical evidence which accompanies the current application. This has also been subject to consultation with statutory consultees, other key stakeholders, and members of the public. Following this engagement, any technical matters have then been subsequently addressed leading to a position where statutory consultees have no objections to the proposals. At the time of writing this Statement, the application is anticipated to be reported to the Council's Planning Committee in January with an officer recommendation for approval.
- 2.19 It is clear from the above that the potential impacts and effects of the proposed development are properly understood and have been appropriately considered in arriving at the proposed allocation.

Question 5.6.4(e) - Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?

- 2.20 The first sentence of the policy requires the site to provide a mixed use development including approximately 350 dwellings, elderly persons accommodation, the retention of 2 hectares of existing employment land and provision of 3.5 hectares of public open space and supporting infrastructure.
- 2.21 The current application (planning ref: PF/22/1596) is proposing 343 dwellings, includes land safeguarded and outline planning application for elderly persons accommodation promoted by a healthcare provider with a track record of delivery which includes operating current sites across North Norfolk. The application proposals, as submitted, include the retention of the existing employment land which amounts to over 2 hectares, and provides 3.8 hectares of high quality open space in excess of proposed policy requirements.
- 2.22 The current application demonstrates how the components of the proposal in Policy NW01/B can manifests itself in a deliverable and viable development proposal, and for this reason, Hopkins Homes Ltd's contends that the first sentence of the policy for the site is justified.

Question 5.6.4(f) - What form would the public open space take?

- 2.23 Criterion 2 of Policy NW01/B sets out the requirements for the Public Open Space – a delivery of not less than 3.5 hectares of public open space.
- 2.24 The Proposed Development seeks to provide significant new publicly-accessible green infrastructure through its open space provision with a variety of open space typologies, in broad accordance with the District Council’s Open Space Assessment.
- 2.25 In order to mitigate concerns around recreational pressures, notwithstanding the payment of GIRAMS, the development also includes a circular walking route to satisfy Natural England requirements.

Question 5.6.4(g) - Having regard to these components, is the estimate of site capacity justified?

- 2.26 It is considered that the estimate of site capacity (approximately 350 dwellings) is justified. The site is being promoted by a regional housing developer, and through the current hybrid planning application, the residential element is submitted in full, and therefore careful consideration of the layout, informed by both technical evidence and statutory consultee comments, has formulated a layout when balanced against all other technical aspects including meeting the spatial requirement of the allocation policy, provides a deliverable scheme of 343 dwellings.
- 2.27 Therefore, Hopkins Homes Ltd contends that the approximate site capacity provided by the allocation policy is justified.

Question 5.6.4(h) - What is the land ownership position and is the site currently being promoted by a developer?

- 2.28 The site is currently promoted by the housing developer who holds an option agreement with the landowner, with an option to purchase subject to securing a satisfactory planning permission.

Question 5.6.4(i) - Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

2.29

As set out in response to Question 5.6.4(e), it is considered that the components of the proposal in the first sentence of the policy for the site are justified and consistent with national policy, with the exception of the prescription around the precise number of elderly accommodation units, referenced under criteria 9 of Policy NW01/B.

Question 5.6.4(j) - Given the components of the proposal and the site requirements, would development of the site be viable?

2.30

A Viability Assessment has been provided with the current application, due to its conflict with the provision of existing adopted affordable housing policy. The Viability Assessment demonstrates that it is only viable for the scheme to provide 15% affordable housing in line with the emerging Local Plan Policy. However, a late change of potential financial contributions related to healthcare and education could comprise this position further, which at the time of writing this Statement is currently being negotiated with the Local Planning Authority ahead of the application being presented to Committee in January 2024.

Question 5.6.4(k) - Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

- 2.31 The Council's updated housing trajectory [Appendix B of doc EX007] anticipates that the first dwellings will be delivered on site in 2025/26. Hopkins Homes would question the 416 cited as Adopted Local Plan Target. The western element of the existing Site allocation was constructed by Hopkins Homes, in accordance with planning permission ref: PF/13/0866, delivering 176 dwellings, public open space and a car park to serve the railway station.
- 2.32 The western element of the existing site allocation was constructed by Persimmon Homes, in accordance with planning permission ref: PF/15/1010, delivering 100 dwellings and 0.89ha of land for commercial uses.
- 2.33 The central section of the existing site allocation forms part of the proposed allocation section. This section of NW01, combined with additional land to the south, is captured within emerging Policy NW01/B, which forms the basis of the current application for 343 dwellings and associated infrastructure. With this in mind, 276 dwellings have been delivered under part of the existing adopted Local Plan allocation. The further 343 dwellings which are the subject of the current application, if consented, would deliver the allocation NW01/B, which includes the remainder of the adopted Local Plan site allocation.
- 2.34 With this in mind, suggest the trajectory figures are updated and aligned with the following delivery targets from Hopkins Homes. Assuming that the current hybrid planning application is determined in January 2024, it is anticipated that start on site will commence in Summer 2024 with delivery of 50 units per annum with anticipated first completion on site in in Summer 2025, well within the Plan period.



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