

**NORTH NORFOLK  
LOCAL PLAN  
EXAMINATION  
HEARING STATEMENT  
– MATTER 10**

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# Quality Assurance

**Site name:** North Norfolk Local Plan Examination  
**Client name:** Hopkins Homes Ltd  
**Type of report:** Hearing Statement – Matter 10

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**Signed** 

**Date** 5 January 2024

**Reviewed by:** James Alflatt BA(Hons) DipTP MSc MRTPI PIEMA

**Signed** 

**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 10 (Delivering Well Connected, Healthy Communities) Questions 10.2, 10.6 and 10.9 of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].

## 2.0 Matter 10

***Question 10.2: Does Policy HC1 need to be clarified for effectiveness? Is a reduction in the threshold for an HIA to 250 dwellings justified? Should there be a threshold for non-allocated sites to be justified? In (1), how do the two sentences relate together? In (2), how is 'major development' defined***

- 2.1 The proposed reduction in the threshold for an HIA to 250 dwellings, down from 500 dwellings in the Regulation 19 Proposed Submission Version of the Plan, does not appear to have been justified or evidenced. The threshold should, therefore, be retained at 500 dwellings, as per the Regulation 19 Draft Plan. Policy 2 of the emerging Greater Norwich Local Plan, capturing neighbouring authorities to the south of North Norfolk District, maintains a 500 dwelling threshold requirement for the preparation of Health Impact Assessments, so deviation from this threshold in North Norfolk is not considered justified or in accordance with strategic objectives in neighbouring authorities.

**Question 10.6: In Policy HC4(1a), is it justified to require compliance with infrastructure requirements set out in supplementary planning documents that do not form part of the plan? In 4b, is it justified to require the highest viable level of affordable housing? Should there be a reference to Policy HOU2 which sets out affordable housing requirements? Should 6 state proposals not accompanied by a viability assessment will be required to be policy compliant?**

- 2.2 Part 1(a) of Policy HC4 should be amended to ensure that aspirations and targets set out within non-statutory Supplementary Planning Documents are not conflated with contributions which are necessary to make a development proposal acceptable, as set out in Regulations 122 and 123 of the Community Infrastructure Levy Regulation 2010.
- 2.3 Moreover, as stated in Hopkins Homes Ltd's response to the Regulation 19 consultation, infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council's Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the district. To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with Paragraph 35(c) of the NPPF, the policy should be revisited to omit this list.
- 2.4 Part 7 of the policy requires development proposals that seek to depart from policy on viability grounds to be supported by a viability assessment at validation stage. This element of the policy should be revised to reflect the amendments that are often made to development proposals following statutory consultation. These amendments often impact upon viability assumptions, so requiring a viability assessment at validation stage would, in most cases, prove premature as the assessment would require continual refinement. Nevertheless, while Hopkins Homes Ltd may submit a viability assessment upon validation of an application, the policy should acknowledge that subsequent updates to the viability assessment may be required during determination of the application, as a consequence of scheme amendments, and if assumptions made around planning obligations vary through the determination process as a consequence of further engagement with statutory consultees.

**Question 10.9: Is it justified for Policy HC7(4) to require compliance with the North Norfolk Design Guide when this does not form part of the plan?**

- 2.4.1 As referenced in our representations in relation to Matter 7, Policy HC7 (Part 4) should not require compliance with the Design Guide, as it does not form a statutory part of the Development Plan.



BIDWELLS