

Written Statement submitted by Lawson Planning Partnership Ltd on behalf of White Lodge (Norwich) Ltd in Response to Matter 10: Delivering Well Connected, Healthy Communities

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 10: Delivering Well Connected, Healthy Communities. The responses below build on our representations to the consultation on the Pre-Submission Draft Local Plan, dated 1st March 2022 and take into account the updated National Planning Policy Framework (NPPF), published on 19th December 2023.

Question 10.7 (part 1): Does the Plan Wide Viability Assessment (Document I11) properly assess the impact of the policies of the plan on the economic viability of development so as to not undermine the deliverability of the plan (NPPF paragraph 34)?

2. Within our representations to the Regulation 19 consultation on the draft Local Plan, we raised an objection to draft Policy HC4 on the grounds that the Interim Plan Wide Viability Assessment (2018) had not sufficiently assessed the viability of housing sites in Small Growth Villages.
3. It was highlighted that the assumptions made of 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. 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 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.
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 considered that compliance with the Policy SS1 requirements (which include sites having to immediately abut the settlement boundary, developments not causing an exceedance of the arbitrary 6% limit for additional dwellings, and sites in excess of 0.25 hectares having to be rejected by local Registered Social Landlords prior to being put forward for open market housing) would have an impact on the viability of delivering sites in Small Growth Villages and would, therefore, undermine the deliverability of identified housing need, including affordable housing in these areas.
9. It is noted that the updated Viability Assessment is based on a Valuation Study undertaken by HEB Chartered Surveyors 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.
10. 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' (5th July 2023), the material price index for 'All Work' increased by 1.5% in May 2023 compared to the same month the previous year.
11. In light of the above, we wish to maintain our **objection** on the grounds that draft Policies SS1 and HC4 do not meet the soundness tests set out at Paragraph 35 of the NPPF as they would not be justified or effective in meeting identified housing need within Small Growth Villages.

Lawson Planning Partnership Ltd, 4th January 2024