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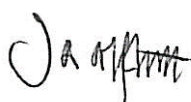
Matter 4: Delivering the Right Mix of Housing Policy (HOU2)  
Hopkins Homes Limited



**NORTH NORFOLK  
LOCAL PLAN  
EXAMINATION  
HEARING STATEMENT  
– MATTER 4**

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# Quality Assurance

<b>Site name:</b>	North Norfolk Local Plan Examination
<b>Client name:</b>	Hopkins Homes Limited
<b>Type of report:</b>	Hearing Statement – Matter 4
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<b>Date</b>	5 January 2024
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<b>Date</b>	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 4 (Delivering the Right Mix of Housing (Policy HOU2), of the Inspectors' Matters Issues and Questions, November 2023 [Document EH0003].

## 2.0 Matter 4: Delivering the Right Mix of Housing

***Question 4.9 – Is the required market housing mix on sites of 6 or more dwellings – not less than 50% two- or three-bedroom properties in a mix comprising approx. 20% two-bed and 80% three-bed – justified by evidence of local need and has its effect on viability been properly assessed? Does this allow sufficient flexibility to meet locally specific needs?***

- 2.1 Hopkins Homes Ltd contends that based upon the current evidence provided by the Council, the approach taken in prescribing the private mix is not justified. This policy approach does not appear to be based upon local housing need and in particular does not reflect the fact that this can vary across the District, and can often be area/settlement specific and change over the duration of this plan period. As currently drafted, this policy has insufficient flexibility in its approach to be responsive to such changes in circumstance.
- 2.2 Furthermore, this policy approach will not be effective over the plan period, as 15–20-year plan period, there can be a lot of fluctuations in local housing need, and market demand. It is more appropriate for the housing developers promoting sites who are much closer to the volatility of the housing market, and what demand and supply is available at the time of progressing development proposals, to provide a more informed basis on which private housing mix has been provided as part of a scheme.
- 2.3 Hopkins Homes Ltd would also consider that this policy approach is not consistent with the NPPF, specifically paragraphs 60 and 63. Whilst it is acknowledged that planning policies should reflect the size, type and tenure of housing needed for different groups (para 63), providing such a prescriptive approach to market housing mix for the duration of the plan period, does not fulfil the ability under para 60 to significantly boost the supply of homes, and specifically homes which are being demanded/required by the local housing market. The policy, as drafted, does not provide sufficient flexibility to adapt to changing circumstances.
- 2.4 The impact of this proposed policy mix to defining the private mix has not been sufficiently tested through the viability of the Plan, and if enforced could stifle the viability of future development projects from meeting other policy requirements, i.e. levels of affordable housing.

**Question 4.11 – Is the requirement on sites of 151 dwellings or more for a minimum of 60 specialist elderly/care units and 40 units for each additional 250 dwellings thereafter justified by evidence of local need and has its effect on viability been properly assessed? Are these sized schemes appropriate, does this allow sufficient flexibility to meet locally specific needs and would the sites be appropriately located in all cases? Has this policy been carried through consistently in the proposed allocations in the plan? How would Class 2 residential care homes be assessed in terms of units?**

- 2.5 Hopkins Homes Ltd submitted representations at Regulation 19 stage of the Plan challenging the soundness of this approach. While Hopkins Homes Ltd are supportive of the delivery of specialist elderly / care provision in North Norfolk, this policy requirement is not justified by evidence, with the Strategic Housing Market Assessment (2019) and Housing Stock Modelling Report (2021) explicitly excluding care provision from its assessment of housing need. This element of HOU2 is therefore considered a departure from Paragraph 35(b) of the NPPF, as the policy approach to delivering care accommodation is not justified by evidence.
- 2.6 Hopkins Homes Ltd contends that a reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation. This is suggested to ensure compliance with Paragraphs 35(b) and 35(c) of the NPPF by removing an unjustified and ineffective element from Policy HOU2.
- 2.7 With reference to the specifics of meeting this policy requirement within an existing and emerging site allocation (Ref: NW01/B Land at Norwich Road & Nursery Drive) the current application (Ref: PF/22/1596) seeks outline approval for the provision of a 66-bed care home. This is based upon the advice of the developer's healthcare development partner, Kingsley Healthcare, who have a proven track record of fulfilling market need for this specialist level of accommodation, with some of its most recent development projects being delivered elsewhere within the district. Through the consultation on the application, the Council's Strategic Housing Team have not raised any objection to the 66-bed care scheme proposed.
- 2.8 Hopkins Homes Ltd do have concerns around the indirect consequence of this policy approach, which are alluded to by the Inspector's question. Based upon the submitted policy approach, there is a real risk that with such an arbitrary threshold which triggers the requirement for Elderly/care units to be provided on a development site, you could have settlements i.e. North Walsham, which is taking a significant proportion of the district's housing requirement through the plan period, could have a saturation of elderly/care units in one settlement, far in excess of the local need, and furthermore making such developments uneconomic to deliver. This would mean that areas of the district without such major housing requirements, but still in need of access to elderly/care units could be disadvantaged by this policy approach, resulting in delivery of elderly care accommodation disproportionately across the district, not in the most appropriate locations or where it is most needed, resulting in the sites not being in the most appropriate locations in all cases.
- 2.9 With this in mind, a more appropriate response would be to require major housing developments (i.e. over 151 dwellings) to provide a proportion of specialist/elderly persons accommodation, however, the scale of provision to be supported by a site specific local market needs assessment at the time the applications are submitted. Such an approach would be considered sound, on the basis that it would then be justified by up-to-date evidence of local need, would be effective in delivering a scale of accommodation that is needed and commercially viable in the market place,

and be consistent with national policy by providing a mechanism which meets the requirements of paragraph 63 of the Framework.

- 2.10 Alternatively, as referenced in our Regulation 19 submissions, by way of comparison, the emerging Greater Norwich Local Plan captures elderly / care provision within its wider housing policy and provides support for such development without prescribing delivery thresholds. In the absence of evidence to justify delivery thresholds for on-site care provision, it is therefore suggested that the North Norfolk Local Plan follows a similar approach.

**Question 4.12 – What contribution would the site allocations make towards addressing the need for specialist elderly/care units in North Norfolk? What is the overall level of need for the different types of provision and how would the remainder be delivered? Should the requirement on large housing sites, perhaps greenfield in nature and peripheral to a settlement, be supplemented by a supportive policy for such development on more centrally located, brownfield sites? Would this assist provision in settlements without large housing sites?**

- 2.11 With reference to the specifics of meeting this policy requirement within an existing and emerging site allocation (Ref: NW01/B Land at Norwich Road & Nursery Drive) the current application seeks outline approval for the provision of a 66-bed care home, informed by a healthcare provider who is a partner to the applicant promoting these current live applications. The Council's Strategic Housing Team have raised no objection to the scale of the care provision provided within these submissions.
- 2.12 The above site is within easy access of main town facilities, including close to the railway station and town centre facilities and, therefore, would be an appropriate location to accommodate such elderly/care accommodation, at a scale which is appropriate for the local need, as detailed by the current application submission.



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