

**GREATER NORWICH
LOCAL PLAN
EXAMINATION (PART 1)
HEARING STATEMENT**

Quality Assurance

Site name: Greater Norwich Local Plan Examination (Part 1)

Client name: Abel Homes Ltd

Type of report: Hearing Statement

Prepared by: Iain Hill MSc DipTP MRTPI

Signed



Date 13th January 2022

Reviewed by: Sarah Hornbrook MA (Cantab) MSc MRTPI

Signed



Date 13th January 2022



Background

- 1.1 This Hearing Statement has been prepared by Bidwells LLP on behalf of Abel Homes Ltd (ID: 24095) in support of representations made to the Greater Norwich Local Plan. By way of background, Abel Homes Ltd are promoting land located at:
- Land south of Norwich Road, Hingham (GNLP0520)
 - Land to the west of West Lane, Horsham St Faith (GNLP0125R); &
 - Land off Beech Avenue, Taverham (GNLP0159R)
- 1.2 This Statement seeks to address Issue 1, Question 4 within Matter 6 Homes (Policy 5).
- 1.3 Issue 1 asks is the policy for affordable housing justified, effective and consistent with the evidence and national policy.

Response to Inspector's Questions

Question 4 of Issue 1 asks:

Policy 5 allows for a viability assessment to be submitted at decision making stage for brownfield sites. Is this approach justified and consistent with national policy?

- 1.4 This approach is neither justified nor consistent with national policy, as it restricts the use of application stage viability assessments to brownfield sites only, without providing evidence to demonstrate that the approach is based on reasonable evidence, or that alternatives have been considered.
- 1.5 Whilst viability testing has been undertaken at the planning making stage, there is the potential that unforeseen matters will arise during the preparation of an application that will influence development viability. A scenario that is not uncommon and can occur on either greenfield or brownfield site. These could, for example, include an increase in build costs, which as has been seen in recent years is not guaranteed to be off-set by a similar increase in sales values. In addition, notwithstanding the work done at the local plan promotion stage, which tends to be desktop based, there is the potential that unforeseen costs associated with matters such as archaeology and contamination will arise as the preparation of a planning application is progressed.
- 1.6 There is also the potential that changing Government guidance will impact the viability of a development. For example, in recent years continually evolving guidance in relation to flooding and surface water drainage has impacted the quantum of development that can be secured on a site, as well as the cost of development. These issues are not restricted to brownfield sites only, and are just as likely to affect greenfield sites. All of this requires flexibility in relation to viability and ultimately the need to be able undertake an application stage Viability Assessment.
- 1.7 Furthermore, the approach set out in Policy 5 is not consistent with national policy; paragraph 58 of the NPPF does not restrict application stage viability assessments to brownfield sites only – it

allows the weight given to such an assessment to be determined by the decision maker having regard to all the relevant circumstances of the specific case.

Suggested Revisions / Modifications

- 1.8 The wording of the policy relating to affordable housing should be expanded to allow for application stage viability assessments for all sites, including greenfield sites, in order to provide flexibility to allow the policy to respond to changing circumstances and to ensure consistency with national policy.



BIDWELLS