



Hopkins Homes Ltd

Greater Norwich Local Plan Examination

Inspectors Matters, Issues and Questions

March 2023

MATTER 4 – SUSTAINABLE COMMUNITIES AND THE ENVIRONMENT

ISSUE 1 – Is Policy 2 justified, effective and consistent with national policy?

Question 16 - Is the modification to Policy 2 suggested by the GNLP (in the Nutrient Neutrality Mitigation Statement of Common Ground with Natural England) justified, effective and consistent with national policy, the Written Ministerial Statement of 16 March 2022, and the evidence?

Hopkins Homes broadly supports the approach taken by the GNLP since April 2022, noting the positive steps taken in seeking to find a way forward that will allow development within the Nutrient Neutrality catchment areas to proceed.

Hopkins Homes support the adoption of the lower occupancy rate utilised within the nutrient budget calculator as this reflects local circumstances, rather than the national average otherwise used by Natural England. On the basis that it is the responsibility of the GNLP Authorities (as the Competent Authority) to undertake this judgement, Hopkins Homes would expect Natural England to be supportive of the use of these new occupancy rates.

Question 17 - Is the application of the Policy 2 as suggested to be modified in Question 16 likely to affect the viability and deliverability of residential development in the plan area?

The evidence suggests that in some scenarios, there could be an impact on the viability of development in the area as a result of the potential costs arising from nutrient neutrality.

Given the evidence is based on estimated costs (which could be higher), in accordance with paragraph 58 of the NPPF, the GNLP should recognise that, notwithstanding the work to inform a site allocation in the Local Plan, a viability assessment can be submitted at application stage.

As paragraph 58 advises, the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.

To ensure the GNLP is justified and consistent with national policy, a policy should be included to recognise that regard will be given to viability considerations at the application stage (on both greenfield and brownfield sites).



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Question 18 - Is the nutrient neutrality mitigation strategy likely to be successful in facilitating the delivery of the plan?

The strategy is only likely to be successful if all partners continue to work positively and proactively to find the solutions necessary to enable much needed housing delivery in the areas affected by Nutrient Neutrality. It is therefore recommended that wording similar to that contained in Agreement 1 (Doc G2.1) should be included in the supporting text to demonstrate the commitment to work collaboratively.