Hopkins Homes are providing this consultation response in reply to the Regulation 19 Pre-Submission Draft Local Plan Consultation by the requested submission deadline of 22nd March 2021.

Hopkins Homes Ltd is the largest independent house building company in East Anglia with a reputation for delivering well designed, high quality residential and mixed-use development harmonising with its local context. In the past decade the company has succeeded in delivering sustainable developments which improve neighbourhoods, improve local infrastructure and add to local distinctiveness throughout the Greater Norwich area.

In respect of the content of the Pre-Submission Draft Plan, Hopkins Homes wish to make the following comments:-

**SECTION 5 – THE STRATEGY**

**THE SETTLEMENT HIERARCHY**

Hopkins Homes have previously suggested that in order for the growth strategy to be considered ‘sound’ the defined ‘Key Service Centres’ identified in Paragraph 191 (iii) should include a number of other settlements throughout the Plan area which are of a size and functional role which can suitably accommodate additional residential growth in a sustainable way.

Notably, Hopkins Homes have proposed sites on the periphery of the villages of Mulbarton and Scole within South Norfolk, both of which settlements benefit from facilities and good connections with nearby higher-order market towns which enable them to accommodate higher levels of growth than are currently envisaged through the proposed Strategy.

In respect of Mulbarton, the existing population in excess of 3,500 is higher than that of over half of the currently suggested designated Key Service Centres, which therefore further confirms the appropriateness of higher levels of proportionate housing growth than currently proposed within the Draft Plan.

Hopkins Homes would therefore suggest that for the Plan to be made ‘sound’, the settlements of Mulbarton and Scole should be added to the list of settlements defined as ‘Key Service Centres’ and the Key Diagram and Map 7 updated to reflect this.

**POLICY 1 - THE SUSTAINABLE GROWTH STRATEGY**

To reflect our comments made upon the Settlement Hierarchy, in order for the growth strategy to be considered ‘sound’, Hopkins Homes suggests that the list of defined ‘Key Service Centres’ proposed within the Table under ‘Housing’ should be amended to add the settlements of Mulbarton and Scole.

As will also be outlined further below, sufficient levels of growth should be allocated to each of the defined ‘Key Service Centres’ to enable them to respectively fulfil their roles to provide for sufficient housing and economic growth over the Plan period.

**POLICY 5 – HOMES**

Whilst Hopkins Homes understands the Government’s desire to promote the development of housing via Self and Custom-Build, it is common knowledge that the vast majority of demand for such housing is upon smaller and individual development sites in predominantly rural locations, rather than as a small portion of a larger development site.

To this end, in order for the Plan to be ‘Sound’, the wording in Paragraph 283 and in the final Paragraph of Policy 5 should be amended to indicate that proposals for self-build dwellings will be encouraged to come forward in sustainable locations and that specific smaller sites in rural locations will be Allocated for this purpose.

**POLICY 7.3 – THE KEY SERVICE CENTRES**

As previously outlined under the Settlement Strategy, Hopkins Homes considers that the villages of Mulbarton and Scole should be formally identified as a Key Service Centres. In particular, Mulbarton, with an existing population in excess of 3,500 is larger and more sustainable than over half of the currently designated Key Service Centres, whilst the village also benefits from a proportionately good range of services and facilities.

Whilst Wroxham has been identified as a ‘Key Service Centre’, no additional allocations are currently proposed to enable future housing growth. Hopkins Homes have previously made Representations to the GNLP that in order to suitably fulfil its role as a Key Service Centre, allocations for the proportionate further residential growth of Wroxham should be made. A copy of these previous Representations are now included as Appendices to these current Representations.

The suggested justification for not proposing any allocations for the growth of Wroxham appears to centre upon unsubstantiated claims of undue traffic and air quality impacts, together with perceived landscape impacts due to the proximity to The Broads. The available evidence does not support these claims.

In respect of traffic and air quality matters, Norfolk County Council’s *‘Wroxham and Hoveton Network Improvement Strategy’* of February 2020 highlighted the good level of available public transport in Wroxham, whilst also noted that existing air quality issues are focussed to the north of the Bridge between Wroxham and Hoveton, with the dominant direction of travel being south towards Norwich. As such, additional growth to the south of Wroxham would have no material impact upon these matters.

In respect of landscape impacts and proximity to The Broads, previous studies and evidence have concluded that additional growth to the south of Wroxham would have no direct visual relationship or impact upon The Broads, with significant resulting separation remaining in place.

Given the otherwise wholly sustainable location of the available land to enable the future growth of Wroxham, in order to suitably fulfil its intended role and function as a Key Service Centre, allocations for additional residential development should be made.

**POLICY 7.4 - VILLAGE CLUSTERS**

Whilst Hopkins Homes support the identification of village clusters to accommodate additional residential development to support the sustainable growth of rural areas, there should be no defined numerical restraint upon the size of site area or the number of dwellings proposed for allocation in this way. Instead, any such allocations should be made so as to be proportionate to the size of settlement cluster within which they are located and the range of facilities available, in order that they successfully meet local housing needs.