

Ref: GA/DJ/06414/L0001

20th March 2018

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

By email: gnlp@norfolk.gov.uk

Dear Sir / Madam,

**Representations to Growth Options document and Site Proposals document for the Greater Norwich Local Plan consultation
On behalf of Orbit Homes (2020) Limited in relation to Land at St Mary's Road, Long Stratton**

On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the current Greater Norwich Local Plan (GNLP) Growth Options and Site Proposals consultation. This consultation represents the first step towards the review of the adopted Joint Core Strategy (JCS) along with various elements of the local plans of Broadland, South Norfolk and Norwich, in particular those that deal with site allocations and the distribution of growth.

This representation seeks to assess the approach that the GNLP should take towards facilitating appropriate levels of growth in Long Stratton and promotes our client's site at Land at St Mary's Road, Long Stratton for residential development of 52 dwellings, associated public open space and access from St Mary's Road.

Response to the Growth Options document

On behalf of our client we wish to make detailed representations in response to the following questions:

Q4: Do you agree that the OAN for 2017-2036 is around 39,000 homes?

and

Q5: Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

In terms of identifying the Objectively Assessed Need (OAN) figure for the plan period, we welcome the GNGB's early adoption of the Government's proposed new standardised approach to the identification of housing need

as set out in both the recent consultation on the 'Planning for the right homes in the right places' consultation paper (September 2017) and the current consultation on the Draft Planning Practice Guidance (March 2018).

The standard methodology seeks to simplify the plan making process by creating a system that is clear, transparent and provides a robust starting point for making important decisions about the location of development. It sets out a simple methodology that only takes past growth trends into account (i.e. household projections based on previous demographic trends and the affordability of homes which indicate whether housing supply has kept up with demand requirements) and does not include a specific uplift to account for factors that could affect those trends in the future (i.e. where it is likely that additional growth above historic trends will occur over the plan period).

Using the standard methodology gives a baseline OAN for 38,988 in the Greater Norwich area over the period 2017 to 2036. The Growth Options document then identifies that there is an additional need for housing to support the additional jobs planned through the City Deal. The Growth Options document doesn't give the figure used in its calculations, but it is understood from a report to the Joint Committee appointed to oversee the delivery of the GNLP, dated 23 June 2017, that the uplift needed to meet additional City Deal jobs growth is 8,361 new homes. Rather than adding this figure of 8,361 homes to the 38,988 baseline, however, the Growth Options document determines that this is not necessary as an uplift has already been applied in the Standard Methodology to address affordability issues. It therefore simply applies a 10% buffer to the 38,988 baseline OAN to reach a housing requirement of 42,887.

As set out above, the standard methodology's approach is intended to be clear, transparent and robust. It purposefully sets out to simplify the way baseline housing requirements are calculated by only taking into account past growth trends and resultant affordability issues. It does not seek to identify when future growth may be above past trends, but does state that uplifts will be appropriate "where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth". It is clear from this that the requirement for a City Deal uplift should not be combined with the standard methodology uplift as one caters for past trends and affordability issues and the other is a positive policy approach that should be applied to meet the area's growth aspirations. Furthermore, a failure to deliver a similarly aspirational level of new homes to accommodate the City Deal jobs growth will push up housing demand and hence impact adversely on affordability, which will push up the standard methodology baseline OAN when the plan is required to be reviewed in 5 years.

As an absolute minimum we would recommend that the plan's housing target is set as f 47,349 representing the OAN calculated using the Government's standard methodology plus the uplift anticipated as part of the City Deal (38,988 homes plus 8,361 homes). Past this point we consider it reasonable to conclude that the 400 homes per annum uplift built into the base OAN plus the strategic uplift represented by the City Deal requirement would negate the need to include an additional 10% buffer. This would result in a residual requirement of 11,684 homes for the plan period, rounded to **11,700** homes.

Q9: Which alternative or alternatives (for the distribution of growth) do you favour?

Whichever growth option is selected, it must place far more emphasis on the delivery of new homes in and around the more sustainable settlements within Broadland and South Norfolk than featured in the current adopted development plan. This should be done with the intention of alleviating issues relating to affordability in both Districts which is a far greater issue than in Norwich.

The preferred growth option selected within the GNLP must recognise this and also ensure the housing requirement is distributed geographically in accordance with the standard methodology housing figure for the 3 local authorities (i.e. 10,032 homes in Broadland, 11,438 homes in Norwich and 17,518 homes in South

Norfolk) to ensure that affordability issues are not increased in South Norfolk because homes are delivered in the wrong location.

On this basis we support a spatial strategy that identifies the role that the most sustainable and best connected settlements within South Norfolk and Broadland can play in providing the homes needed in these areas while also supporting the wider strategy for jobs growth in the Greater Norwich area. We consider that this should be framed around a combination of Option 2 'Transport corridor focussed' and Option 3 'Cambridge and Norwich Tech Corridor focussed'.

The Main Towns and Key Service Centres of the plan area should serve as the focal point for a substantial level of sustainable growth delivered on medium sized sites ranging from upwards of 50 dwellings which can be delivered in the short-term.

Currently the maximum level of growth allocated to the Main Towns under any one option is the figure included as part of Option 2, 1,650 homes to be distributed between Aylsham, Diss, Harleston, Wymondham and Long Stratton.

Taking into account our response to Q4, Q5 and Q6, which identifies a housing requirement for the plan area which is approximately 60% higher than that already provided for in the consultation document this figure should be proportionately increased to approximately 2,750 homes across the four Main Towns. This would result in a basic housing allocation for each Main Town (Long Stratton included) of approximately 550 dwellings, a figure that should then be adjusted considering a range of issues including the availability of sites and most importantly connectivity with Norwich, for which Wymondham and Long Stratton, of the towns in South Norfolk, perform particularly well.

Response to the Site Proposals document

In response to Question 2 of the Site Proposals document, which seeks comments on sites already submitted, we include below detailed information in support of the allocation of our client's site at St Mary's Road, Long Stratton (Site Reference: GNLP0509) for residential development of 52 dwellings, association public open space and access from St Mary's Road.

Site Description

The site is 3.6 hectares in size and comprises two lower quality agricultural parcels of land located outside but contiguous with the south-western edge of the built-up area of Long Stratton. The site benefits from an existing vehicular access from St Marys Road via a field gate which can be utilised to serve a residential development of the extent proposed. There are no Public Rights of Way which traverse or adjoin the site.

The site lies entirely within Flood Zone 1, classified as having a low probability of flooding. It is not within a Conservation Area or within close proximity to any listed buildings. There are no Tree Preservation Orders or statutory or non-statutory designated ecological sites within the vicinity of the site. The site is in a sustainable location within walking distance of a range of services and facilities and bus stops.



The Proposed Development

A full planning application was submitted for 66 dwellings and a large area of open space on the site at the end of March 2017. The application proposed residential development on the eastern of the site's two fields, with a large area of public open space being provided on the western field.

Following positive discussions with the Council's planning officers it is now proposed to reduce the number of dwellings proposed to 52 in order to enable the inclusion of an area of public open space and children's play space within the residential area in the eastern field. The new area of open space would be provided in addition to the large area already proposed to the west of the site. A revised site layout plan has not yet been formally submitted, but officers have confirmed that the sketch layout enclosed with this letter has positively responded to their previous comments, subject to a few minor amendments that will be made ahead of formal submission.

The revised scheme proposes:

- The erection of 52 dwellings comprising a mix of 1, 2, 3 and 4 bedroom houses and bungalows;
- 33% affordable housing;
- Vehicular access off St Mary's Road with a Type 3 road connecting to a series of private drives and shared surfaces;
- Continuation of footpaths from St Mary's Road into the site in order to provide pedestrian accessibility to Flowerpot Lane and thereafter Manor Road enabling access to nearby schools and the centre of Long Stratton.

A footpath will also be provided along the southern side of Flowerpot Lane to the west of St Mary's Road where it is currently lacking, increasing pedestrian accessibility to the west of Long Stratton;

- The significant provision of 1.6 hectares of public open space in the western of the site's two fields;
- Policy compliant levels of public open space within the residential area in the eastern field; and
- The retention and enhancement of existing boundary planting and additional site wide landscaping.

The Applicant

Orbit Homes (2020) Limited is part of the Orbit Group, a registered social landlord and the 5th largest in the UK who own and manage a wide range of family homes, sheltered apartments, mobility homes and first time buyer properties across the Midlands, East, and South of England. Orbit Homes (2020) Limited are the developing arm of the housing association and are the second largest in the UK.

The Orbit Group is a non-profit making company without stakeholders who re-invest any surplus revenue generated from market sales into the delivery of affordable housing. This enables the company to continue to provide high quality affordable housing with or without dependence on public subsidy. It is Orbit's intention to maintain a long term interest in the site, managing the affordable units and using the funds generated from the private sales to invest elsewhere in the local area.

Assessment

As demonstrated in our comments to the Growth Options document, there is a clear need for additional site allocations in the most sustainable settlements in South Norfolk to help meet a stretching housing requirement to support the City Deal's growth aspirations and address local affordability issues.

It is recognised that Long Stratton is already set to receive a significant level of development through Policy LNGS1 of the Long Stratton Area Action plan which allocates 1,800 homes on land to the east, south-east and north-west of the town. This site allocation is set to bring significant benefits to the town, most notably the provision of a long awaited A140 bypass. It is clear, however, that despite the best intentions of the Council to bring this allocation forward as soon as possible, there have been significant delays caused by the complexity of delivering this key piece of infrastructure.

Delivery projections for Policy LNGS1 have been consistently pushed back. The Councils' Annual Monitoring Report published in January 2017 projected the delivery of 610 dwellings during the five years from 2018/19 to 2022/23¹, but this figure has now been revised to just 280 dwellings² during the same timeframe. Planning applications were finally submitted for the different parts of Policy LNGS1 in January 2018, but we still consider that the Council's delivery projections of 280 dwellings in the next five years are overly optimistic. We would expect the planning process for a site of this scale to take at least 4 years with an added few months following the grant of full planning permission before the first home is delivered.

The table below contains the delivery projections in the Council's most recent housing trajectory for sites in Long Stratton. It shows that even based on the Council's overly optimistic predictions for Policy LNGS1, zero properties expected to be delivered in the next 2 years and just 35 homes in the next 3 years. Following the grant of planning permission, it is anticipated that the development of St Mary's will take approximately 2 years to construct and could be completed by the end of 2020. The development of the promoted site would therefore help fill the currently predicted gap in housing delivery in the town to ensure the GNLP's goals are met.

¹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2015-2016, Appendix A – Greater Norwich Area Housing Land Supply Assessment April 2016, January 2017

² Joint Core Strategy for Broadland, Norwich and South Norfolk: Draft Annual Monitoring Report 2016-2017, Appendix A – Greater Norwich Area Housing Land Supply Assessment 1st April 2017, March 2018

Long Stratton Housing Trajectory (Source: Joint Core Strategy for Broadland, Norwich and South Norfolk: Draft Annual Monitoring Report 2016-2017, Appendix A – Greater Norwich Area Housing Land Supply Assessment 1st April 2017, March 2018)

Site	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	Beyond 2026
LNGS1				35	35	35	35	35	35	390
Allocation					75	100	100	100	100	725
Cygnets House	48									
39 Swan Lane	6									
Total	54	0	0	35	110	110	110	110	110	1,115

Land at St Mary’s Road, Long Stratton represents a suitable, achievable, viable and therefore deliverable source of housing land in the first few years of the plan period. It is in a sustainable location for residential development and is entirely unconstrained with nothing preventing development taking place immediately upon the receipt of the requisite consents. We therefore consider that it should be allocated in the emerging GNLP to help achieve the required growth in the Greater Norwich area and South Norfolk in particular.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours sincerely

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Encs.