

Ref: GA/DJ/00320/L0001

16<sup>th</sup> March 2020

**Sent by Email to: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)**

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

Dear Sirs

**Greater Norwich Local Plan – Regulation 18 Draft Plan Consultation  
On behalf of Orbit Homes (2020) Limited**

On behalf of our client Orbit Homes (2020) Limited we wish to make representations to the Greater Norwich Local Plan (GNLP) Regulation 18 Draft Plan Consultation.

These representations comprise Orbit Homes' comments on the policies contained in the Draft Strategy document and on the Draft Sites document for Long Stratton. This letter provides a summary of Orbit Homes' representations and detailed representations on the following policies / sites are enclosed as follows:

- **Enclosure 1. Response Form**
- **Enclosure 2. Policy 1 – Growth Strategy**
- **Enclosure 3. Policy 2 – Sustainable Communities**
- **Enclosure 4. Policy 5 – Homes**
- **Enclosure 5. Policy 7.2 – The Main Towns**
- **Enclosure 6. GNLP0509 – Land south of St Mary's Road, Long Stratton**
- **Enclosure 7. Policy 7.4 – Village Clusters, including:**
  - **Land to the north of Ransome Avenue, Scole; and**
  - **Land north of Church Road, Tasburgh**

In addition to these representations, Orbit Homes is working with Bowbridge Strategic Land in the promotion of Silfield Garden Village. Separate representations have been prepared by David Lock Associates in support of this site and where appropriate these representations cross refer to each other.

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## About Orbit Homes

Orbit Homes is the development arm of the Orbit Group, one of the largest Registered Providers in the UK that owns and manages a growing portfolio of more than 43,000 homes. Orbit delivers around 1,700 new properties to market per year, it has delivered 12,000 over the last 8 years and will deliver a further 10,000 by 2025.

Orbit is active in the Greater Norwich area as both a developer and affordable housing provider. The company owns and manages dwellings across the three authorities and is currently developing two sites in Greater Norwich at St Anne's Quarter, Norwich and Fullers Place, Harleston. In addition, Orbit Homes is now a strategic partner of Homes England, providing a unique opportunity to deliver new affordable housing developments across Greater Norwich.

## Summary of Representations

We are pleased to set out below a summary of the detailed representations contained as enclosures to this letter:

### Policy 1 – Growth Strategy:

- **Settlement Hierarchy:** Orbit Homes is broadly supportive of the proposed settlement hierarchy, but considers that Wymondham should be considered above the other main towns as a 'key town' due to its size and location in the Cambridge to Norwich Tech Corridor.
- **Distribution of Development:** Orbit Homes also considers that a higher proportion of the housing requirement should be directed to the Main Towns. The Main Towns are sustainable locations with deliverable housing options that could deliver much of the growth needed in Greater Norwich resulting in a sustainable and deliverable distribution of development that avoids increased growth in both unsustainable villages and undeliverable locations in and adjoining the Norwich urban area.
- **Housing Requirement:** The justification for not considering a higher housing requirement than that provided by the standard methodology (i.e. that a higher requirement would be both unachievable and could be met by flexibility built into the plan) is both contradictory and contrary to Planning Practice Guidance (PPG) that requires considerations of housing need to be separate from assessments of how needs can be accommodated. The PPG advises that setting a higher housing requirement may be appropriate where growth strategies indicate that housing need is likely to exceed past trends. This is clearly the case for the City Deal housing commitment to 2026 and for economic ambitions for the Cambridge Norwich Tech Corridor. Our assessment of the housing requirement on behalf of Orbit Homes indicates **a need for a minimum of between 4,000 to 6,300 additional dwellings** to be allocated in the GNL.
- **Five Year Supply Calculations:** Orbit Homes supports the approach to calculating the 5 year housing land supply across the whole of the three districts.
- **Local Plan Review:** Orbit Homes objection to the proposal to review the Local Plan 5 years after adoption as it is contrary to the NPPF requirement at paragraph 60 for reviews to be completed no later than five years from the adoption date of a plan. The wording of this policy therefore clearly needs amending to clarify that the review of the Local Plan needs to be completed within 5 years of adoption. Orbit Homes also considers that an additional criteria should be added to the policy to require a review of the plan if delivery falls significantly below (e.g. below c.80%) the City Deal housing commitment.

## Policy 2 – Sustainable Communities

- **Landscape character:** The policy requirement to “Respect, protect and enhance landscape character” fails to accord with NPPF paragraphs 127 and 170 and should be changed to “Recognise and by sympathetic to ~~Respect, protect and enhance~~ landscape character”.
- **Water efficiency:** The proposal to set the higher optional standard for water efficiency (i.e. 110 l/p/d) will need to be justified by viability evidence and there is no justification for requiring an unknown potential future government requirement.
- **Energy efficiency:** Orbit Homes recognises that there is a need to move towards stronger measures to improve energy efficiency, but standards should be set nationally and the NPPF states that any local requirements should reflect national technical standards. The proposed 20% reduction on building regulations is contrary to this guidance.

## Policy 5 – Homes

- **Affordable Housing:** Orbit Homes considers the proportion of affordable homes required to be appropriate, but the term “at least” should be removed from the policy prior to each percentage requirement to provide certainty for the decision maker and applicant as to the required level of provision. The requirement for 10% of the affordable homes to be for affordable home ownership misinterprets NPPF paragraph 64 that actually requires 10% of all dwellings on major development to be for affordable home ownership (subject to certain exemptions that should be considered and reflected in the policy wording accordingly).
- **Space standards:** The application of national described space standards across all developments without exception would have a significant impact on Orbit Homes’ ability to viably deliver affordable housing developments as Orbit Homes’ grant funding provided by Homes England is based on a maximum floorspace per size of dwelling (i.e. number of bedrooms) that is approximately 85% of that required to meet the nationally described space standards. Policy 5, as currently worded, would therefore have a significant negative impact on Orbit Homes’ and other RSL’s ability to deliver affordable housing in the area as their funding would not cover the costs of building the larger dwellings.
- **Accessible housing:** Policy 5 requires at least 20% of homes on major developments to be built to M4(2) accessibility standards. Orbit Homes considers this requirement to be reasonable based on the need for such dwellings in the local population.
- **Self/Custom-Build:** The requirement for 5% of dwellings on sites of over 40 dwellings to be self-custom-build plots is excessive and not based on evidence of need from the Councils’ self-build register or any assessment of the type and location of plots sought by self-builders.
- **Housing Mix:** The policy does not contain any guidance on the required housing size mix. We would expect this to be included and Orbit Homes favours a flexible approach in this regard that requires broad accordance with the latest SHMA evidence.

## Policy 7.2 – The Main Towns

- **Approach to Main Towns:** The Main Towns form the second tier in the settlement hierarchy and are the most sustainable options for growth outside Norwich and yet are allocated just 14.5% of total

growth during the plan period. This strategy fails to take full advantage of the potential of these settlements to sustainably grow and meet the housing needs of their catchment areas. Orbit Homes' representations to Policy 1 identify a need to identify an additional 4,000 to 6,300 dwellings above those currently proposed to be allocated in the GNLP. The most sustainable and deliverable option to meet this requirement is to allocate a higher proportion of the increased housing requirement to the Main Towns.

- **Approach to Long Stratton:** Orbit Homes objects to the approach to development in Long Stratton, which proposes to allocate no additional dwellings above existing commitments to the town. The justification provided for this decision is that because Long Stratton is allocated to grow by c.1,800 homes in the current Joint Core Strategy (2011) and Area Action Plan (2016), it should not be allocated any additional dwellings. This is not a justifiable approach as it fails to accept the failure of the 1,800 home allocation to deliver any new homes despite being a key component of the current development plan and not the emerging Local Plan. The reality of the situation is that the 1,800 home allocation is likely to continue to be much delayed and its failure to progress has meant that Long Stratton has had very little growth over the last 10 years and certainly below the level of growth appropriate for an aspiring new town. Growth is needed now to meet current pent up needs, including a critical need for affordable housing, and deliverable sites should not be prevented from coming forwards to meet this need just because a large housing allocation that remains fundamentally stalled may at some point start to deliver dwellings in the town. The key issue with the delivery of the 1,800 allocation in Long Stratton is that it is reliant on the delivery of a new bypass before the occupation of the 250th new dwelling, but the development is unable to viably deliver this bypass without significant government funding and no decision on this funding has yet been made. In this context, it is essential that the GNLP recognises the need for growth in Long Stratton and takes the opportunity to allocate additional growth to the town to meet the increased housing requirement identified in Orbit Homes' representation to Policy 1.

### **Sites Document for Long Stratton**

- **GNLP0509 – Land south of St Mary's Road, Long Stratton:** Orbit Homes object to the identification of Land south of St Mary's Road, Long Stratton as an 'unreasonable site'. This conclusion is not justified by the Council's own evidence contained in the Site Assessment Booklet for Long Stratton which demonstrates that the site is the only option for growth in the town that has been consistently assessed as suitable for development. The reasons for discounting the site are dubious and unsubstantiated and the promoted development would bring significant benefits in terms of the delivery of market and affordable housing and open space. The proposed development is shovel ready and could be delivered in the short term to meet Long Stratton's needs now. In the context of the clear need for additional allocations in the town identified in Orbit Homes' representations to Policies 1 and 7.2, it should be therefore be allocated accordingly.

### **Policy 7.4 – Village Clusters**

- **Approach to Village Clusters in South Norfolk:** Orbit Homes objects to the approach in South Norfolk to produce a separate a separate South Norfolk Village Clusters plan. This approach significantly undermines strategic approach to delivery in the GNLP as the scale of growth attributed to the Village Clusters plan (at 1,200 homes or c.15% of all new allocations) is clearly of a strategic scale and to proceed to allocate such a significant level of growth to the village clusters without an assessment of the ability of these villages to accommodate this growth is clearly a flawed approach.

- **Policy SCO 1: Land to the north of Ransome Avenue, Scole** – This 1.02 ha site is allocated in the Site Specific Allocations and Policies Document (2015) for approximately 15 dwellings, but with the capacity to sustainably accommodate up to 35 dwellings and was promoted for this increased level of development to the GNLP Call for Sites in 2016 (ref. GNLP0511). The currently allocated level of development does not reflect the site’s true capacity and fails to make the most efficient use of land in accordance with the NPPF. As a comparatively large village with a primary school, it is expected that Scole will be allocated additional growth. In this respect, the most sustainable solution to growth would clearly be to maximise the efficient use of land on this existing allocation before looking at releasing additional green field land.
- **Policy TAS 1: Land north of Church Road and west of Tasburgh School, Tasburgh** – This 1.14 ha allocated in the Site Specific Allocations and Policies Document (2015) for approximately 20 dwellings, but with the capacity to sustainably accommodate approximately 35 dwellings. The site has not yet been promoted through the GNLP (please see site submission form attached at Appendix 1 of Enclosure 6). The currently allocated level of development does not reflect the site’s true capacity and fails to make the most efficient use of land in accordance with the NPPF. As a comparatively large village with a primary school, it is expected that Tasburgh will be allocated additional growth. In this respect, the most sustainable solution to growth would clearly be to maximise the efficient use of land on this existing allocation before looking at releasing additional green field land.

We trust that these comments will be given due consideration and look forward to participating further as the Greater Norwich Local Plan progresses. If you require any further information in respect of our client’s site then please do not hesitate to contact me.

Yours sincerely

Geoff Armstrong

**Director  
Armstrong Rigg Planning**

Encs.

**Enclosure 1**  
**Response Form**

# Greater Norwich Local Plan

## Regulation 18 Draft Plan Consultation

### Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29<sup>th</sup> January to 16<sup>th</sup> March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk). There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

## **Submitting your Response Form**

Responses should be submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or completed hard copy forms should be sent to:

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

**All submissions should be made no later than 5pm on  
Monday 16<sup>th</sup> March 2020.**



<b>1a. Contact Details</b>	
Title	Mr
First Name	Geoff
Last Name	Armstrong
Job Title (where relevant)	Director
Organisation (where relevant)	Armstrong Rigg Planning
Address	
Post Code	
Telephone Number	
Email Address	

<b>1b. I am...</b>	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

<b>1c. Client/Landowner Details</b> (if different from question 1a)

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Orbit Homes
Address	C/o Agent
Post Code	
Telephone Number	
Email Address	

**Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.**

<b>Policy or site reference</b>	<b>Comments</b>
Policy 1 – Growth Strategy  Policy 2 – Sustainable Communities  Policy 5 – Homes  Policy 7.2 – The Main Towns  GNLP0509 – Land south of St Mary's Road, Long Stratton	Please see cover letter and enclosures for detailed representations on these policies and sites.

Policy 7.4 – Village Clusters:

GNLP0511 – Land to the north of Ransome Avenue, Scole

Site submission – Land north of Church Road and west of Tasburgh School, Tasburgh

**Please add additional sheets if necessary**

Please see cover letter and enclosures.

**Disclaimer**

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Geoff Armstrong	Date 10.03.2020
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**Greater Norwich –Regulation 18 Draft Local Plan Response Form**

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or phone us on 01603 306603.

**Enclosure 2**

**Policy 1 – Growth Strategy**

## **Greater Norwich Local Plan Regulation 18 Draft Strategy Representations on behalf of Orbit Homes**

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### **Policy 1 – Growth Strategy**

Draft **Policy 1** identifies the proposed housing requirement and spatial strategy for growth in the GNLP area between 2018-2038. The Draft Strategy document poses several consultation questions on matters concerning housing in this policy. We respond these questions on behalf of Orbit Homes below.

#### **Question 13.**

#### **Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

**Policy 1** proposes the following settlement hierarchy:

1. Norwich urban area (Norwich and Norwich Fringe)
2. Main towns (Aylsham, Diss, Harleston, Long Stratton and Wymondham)
3. Key service centres
4. Village clusters

It states that growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure through urban and rural regeneration, along with sustainable urban and village extensions. It focusses most of the housing, employment and infrastructure growth in the Strategic Growth Area (i.e. Norwich, the A11 corridor and the Growth Triangle), but also allocates growth to towns and villages to support vibrant rural communities.

Orbit Homes is broadly supportive of the proposed settlement hierarchy, but as set out in the separate representations prepared by David Lock Associates promoting Silfield Garden Village on behalf of Orbit Homes and Bowbridge Strategic Land, it considers that Wymondham should be considered above the other main towns. Wymondham is the second largest settlement in Greater Norwich and is almost twice the size of the next largest town. There is therefore a good argument for it to be considered above the other main towns in the hierarchy as a 'key town'. It is also strategically located in the heart of the Cambridge to Norwich Tech Corridor and is ideally placed to provide strategic scale growth that is sustainable and deliverable.

Orbit Homes therefore consider that the settlement hierarchy should be changed as follows:

1. Norwich urban area (Norwich and Norwich Fringe)
2. **Key town (Wymondham)**
3. Main towns (Aylsham, Diss, Harleston, **and** Long Stratton **and Wymondham**)
4. Key service centres
5. Village clusters

In Table 1 below, we provide a comparison of the distribution of existing and proposed growth to different levels of the hierarchy.

Table 1. Settlement Hierarchy Distribution - Existing commitments and new allocations

Area	Existing commitments		New allocations		Total Growth 2018-2038	
	No.	%	No.	%	No.	%
<b>Norwich urban area</b> (Norwich and Norwich Fringe) settlements)	26,165	71.5%	4,395	56%	30,560	69%
<b>Main Towns</b> (Wymondham, Aylsham, Diss, Harleston and Long Stratton)	5,092	14%	1,250	16%	6,342	14.5%
<b>Key Service Centres</b> (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon, Poringland, Reepham and Wroxham)	2,902	8%	515	6.5%	3,417	7.5%
<b>Village Clusters</b> (Broadland Village Clusters) (South Norfolk Village Clusters)	2,344 (995) (1,349)	6.5% (3%) (3.5%)	1,680 (480) (1,200)	21.5% (6%) (15.5%)	4,024 (1,475) (2,549)	9% (3.5%) (5.5%)
<b>Total</b>	<b>36,503</b>	<b>100%</b>	<b>7,840</b>	<b>100%</b>	<b>44,343</b>	<b>100%</b>

Table 1 above demonstrates that, compared to existing commitments, the strategy for new allocations focusses a significantly higher proportion of growth to the village clusters (increased from 6.5% of existing commitments to 21.5% of new allocations), broadly similar levels of growth to the main towns (increased from 14%-16%) and key service centres (decreased from 8 to 6.5%) and a significant decrease in growth directed to the Norwich urban area (decreased from 71.5% to 56%).

Orbit Homes is aware of Norwich City Council's objections<sup>1</sup> to this change of focus, as it considers additional growth should be focussed on the city and that this change in strategy goes against the professed aims of the GNL's Climate Change Statement to deliver growth in sustainable locations that reduce the need to travel. Orbit Homes recognises this argument and notes that there has been no assessment of the ability of village clusters in South Norfolk to accommodate the high level of growth proposed. Orbit Homes is however concerned that, due to significant existing commitments, any significant additional growth in and adjoining the Norwich urban area would suffer from the same deliverability issues that have plagued the current development plan. To avoid this issue whilst ensuring development is directed to sustainable locations, Orbit Homes considers that a higher proportion of the housing requirement should be directed to deliverable sites at the Main Towns.

As set in Orbit Homes' representations to Policy 7.2, the Main Towns are sustainable locations with deliverable housing options that could deliver much of the growth needed in Greater Norwich. As set out under Question 14 below, Orbit Homes considers that the proposed housing requirement should be significantly increased to account for City Deal growth commitments. In this respect, it would clearly be inappropriate to allocate the same proportion of growth to village clusters if a higher requirement is set. A higher proportion of this additional growth will therefore need to be met in settlements further up the hierarchy, and particularly in the Main Towns, where the resultant strategic levels of growth would be most sustainably accommodated.

## Question 14

**Do you support, object or wish to comment on the approach for housing numbers and delivery?**

[Comments on Approach](#)

<sup>1</sup> Report to Norwich City Council Sustainable Development Panel, 15<sup>th</sup> January 2020 (available at: <https://cmis.norwich.gov.uk/live/Meetingscalendar/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/776/Committee/9/SelectedTab/Documents/Default.aspx>)

The Strategy Document proposes to set a housing requirement of **40,541 new dwellings** between 2018 and 2038 (**2,027 dpa**) which has been calculated using the government's standard methodology, but seeks to plan for a 9% buffer (to be increased to 10% in the final plan) on top of this requirement by **delivering 44,343 new homes by 2038**. Existing allocations and commitments total 36,503 dwellings which comprises 82% of the proposed housing growth (and 90% of the housing requirement) to 2038. The GNL and separate South Norfolk Village Clusters (SNVC) plan therefore only seeks to plan for the additional 18% of growth, totalling **7,840 dwellings** (split between 6,640 dwellings in the GNL and 1,200 dwellings in the SNVC plan).

Under potential alternative approaches, the Strategy Document states that there are no exceptional circumstances to justify setting a lower housing requirement than that identified using the standard methodology. We would agree with this statement in accordance with the test set by NPPF Paragraph 60. However, in terms of whether a higher housing requirement may be needed, the justification provided is clearly not in accordance with national policy. The Strategy Document states that:

*"The NPPF does encourage a higher housing requirement to be considered. This is not the preferred alternative as evidence of delivery over the medium and longer term suggests that higher targets are unlikely to be achievable or deliverable. Setting a higher target than can be achieved undermines the planned system. However, if additional need and demand for housing materialises, it can be facilitated through the flexibility built into the local plan."*

Not only is the above statement contradictory (as it claims that a higher target could not be delivered and at the same time says that if additional need materialises it could be facilitated through flexibility in the plan), but it is entirely contrary to national policy set out in Planning Practice Guidance (PPG) on Housing and economic needs assessments (ID: 2a-010) which provides advice on when it might be appropriate to plan for a higher housing need figure than the standard method indicates. The PPG clearly states that the standard method provides a minimum starting point in determining the number of homes needed in an area. There will, therefore, be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The PPG advises that **"This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated"**. The approach taken by the Greater Norwich authorities of restricting the housing requirement to what can be accommodated is therefore completely contrary to the PPG.

The PPG additionally advises that circumstances where setting a higher housing requirement may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

The first two of the points above clearly apply in Greater Norwich with respect Greater Norwich City Deal and the ambitions of the Cambridge Norwich Tech Corridor. The City Deal was signed in December 2013 and commits the authorities to secure significant infrastructure funding totalling £440 million and to bring forward 3,000 additional homes by 2026 in the North East Growth Triangle (on top of the target of 37,000 set by the JCS for the whole plan area). Whilst it is recognised that the development



requirements of the City Deal have been facilitated in part by the allocation of 3,000 additional homes in the adopted Growth Triangle Area Action Plan (GTAAP), the delivery of these strategic housing sites has been slow. To this end the emerging GNLP offers the opportunity to provide fresh stimulus to achieving the ambitions of the City Deal prior to 2026 to make up for any shortfall in new jobs and housing.

Secondly, it is vital that the GNLP responds to the ambitions of the Cambridge Norwich Tech Corridor (CNTC), the vision of which seeks to attract 26,000 additional jobs and 46,000 further residents to the corridor prior to 2031. At this stage it is apparent that whilst the CNTC proposals would be hugely positive for the plan area they currently represent what is still little more than an aspirational programme for growth with limited delivery mechanisms in place. This is where the GNLP must play a major role in making the CNTC vision a reality.

One of the options put forward in the previous regulation 18 GNLP consultation in March 2018 was to provide an additional uplift in the housing requirement to take account of the City Deal, but this was discounted as the authorities claimed that the uplift applied by the standard method (i.e. the uplift to account for the affordability of homes that is built into the standard methodology) was sufficient to account for the City Deal uplift required. We disagree with this approach as it fails to reflect the fact that the standard method is a 'policy off' calculation of the housing requirement and any adjustments required to due to 'policy on' decisions (i.e. to sign a City Deal) should be on top of this.

In light of the above, Orbit Homes wishes to raise a significant concern regarding the approach employed to set the housing requirement. The use of the standard methodology simply adopts the minimum requirements set by the government and fails to recognise the City Deal growth commitments and ambitions of the CNTC proposals. The significant investment and jobs growth that will result from both these growth strategies will result in an increased housing demand above and beyond the baseline requirement calculated using the Government's Standard Methodology. It is therefore critical that the housing requirement is increased to meet this increased demand. The majority of this increased growth will be in the Cambridge Norwich Tech Corridor (i.e. along the A11 southwest of Norwich), but it is critical also that the needs of the local population across the plan area are planned for so as to avoid creating an imbalance in housing delivery across the plan area.

#### Comments on Housing Requirement

The currently proposed housing requirement does not account for the City Deal or Cambridge Norwich Tech Corridor (CNTC) which must both be taken into account if the housing requirement is provide a positive approach to meeting housing needs. This section provides an analysis of the impact of these growth strategies on the housing requirement.

As set out above, the City Deal commits the Councils to delivering 3,000 additional homes in the Growth Triangle on top of the Joint Core Strategy housing requirement by 2026. In order to analyse performance against the City Deal commitment we need to account for how many homes have been delivered and how may homes are currently forecast to be delivered during the JCS plan period between 2008 and 2026 and whether this delivery will meet the 40,000 home commitment set by the City Deal (i.e. 37,000 JCS requirement + 3,000 in the Growth Triangle). Table 2 utilises data in the JCS Annual Monitoring Reports to provide this information.

*Table 2. Progress Towards Meeting City Deal Housing Commitment*

<b>Year</b>	<b>Delivery*</b>	<b>Forecast**</b>
2008/09	1,736	
2009/10	1,237	
2010/11	1,168	

2011/12	1,182	
2012/13	1,214	
2013/14	1,241	
2014/15	1,681	
2015/16	1,728	
2016/17	2,251	
2017/18	2,034	
<b>Total delivered</b>	<b>15,472</b>	
<b>Additional Homes required to meet 40,000 home commitment to 2026</b>	<b>24,528</b>	
2018/19		2,879
2019/20		2,632
2020/21		2,957
2021/22		2,760
2022/23		2,863
2023/24		2,471
2024/25		1,799
2025/26		1,203
<b>Total forecast</b>		<b>19,564</b>
<b>Total delivered + forecast</b>		<b>35,036</b>
<b>Forecast shortfall against 40,000 home commitment at 2026</b>		<b>4,964</b>

\* Delivery data for 2008/09 – 2010/11 taken from Annual Monitoring Report 2010-2011

Delivery data for 2011/12 – 2017/18 taken from Annual Monitoring Report 2017-18

\*\* Forecast data for 2018/19 – 2025/26 taken from Housing Land Supply Assessment 1<sup>st</sup> April 2018

[figures provided are the sum of delivery forecasts for BDC, NCC and SNDC]

The above table demonstrates that at the end 2017/18, Greater Norwich had delivered 15,472 net new homes against a commitment to deliver 40,000 by 2026 set out in the City Deal. This leaves a total of 24,528 still to be delivered by 2026 or 3,066 dpa over 8 years. Against this requirement, there is a current shortfall in forecast delivery of 4,964 dwellings. The GNLP offers the opportunity to provide fresh stimulus to achieving the ambitions of the City Deal by making additional allocations on short term deliverable housing sites to provide 4,964 new homes.

An alternative way of assessing the additional housing required to meet City Deal demand is to look at the SHMA published in April 2017. This document identifies that the jobs growth facilitated by the City Deal would likely result in a demand for approximately 8,361 new homes above and beyond those required as a result of general demographic change over the period until 2036. Even when deducting the 3,000 dwellings planned for in the GTAAP this results in an additional requirement of 5,361 homes (i.e. very similar to the 4,964 additional homes identified by the assessment of shortfall in table 2) that appear not to have been considered when setting the GNLP housing requirement.

On this basis we consider that the housing requirement proposed by the plan falls short of adequately responding to local demand by an approximate 5,000-5,400<sup>2</sup> homes. This is before the additional demand generated by the CNTC is taken into account. In which case the absolute minimum housing requirement for the GNLP should be somewhere in the region of 45,500-46,000<sup>3</sup> dwellings before any buffer is applied. In which case it is our view that upon the application of the appropriate buffer the GNLP should be planning for somewhere **between 48,300 and 50,600<sup>4</sup> dwellings as a minimum,**

<sup>2</sup> 4,964-5,361 dwellings rounded up to the nearest 100

<sup>3</sup> LHN of 40,541 dwellings plus 5,000-5,400 uplift rounded up to nearest 100

<sup>4</sup> Range calculated on the basis of a 5% and 10% buffer above 46,000, in response to paragraph 73 of the NPPF

against which there are existing commitments of c.36,500<sup>5</sup> dwellings, leaving a requirement for the GNL P to deliver a minimum of between 11,800 and 14,100<sup>6</sup> additional dwellings, or **between approximately 4,000 and 6,300<sup>7</sup> dwellings higher than the current GNL P additional growth figure of 7,840**. This highlights the need for significant additional allocations in the GNL P.

#### **Question 16.**

#### **Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?**

Orbit Homes supports the approach to calculating the 5 year housing land supply across the whole of the three districts, but object to the proposal to review the Local Plan 5 years after adoption. The NPPF at paragraph 60 states that "Reviews should be completed no later than five years from the adoption date of a plan". The wording of this policy therefore clearly needs amending to clarify that the review of the Local Plan needs to be completed within 5 years of adoption, as follows:

**~~This plan will be reviewed~~ The Councils will complete and publish a review of this plan 5 years after adoption to assess whether it needs to be updated.**

In light of the above discussion on the Greater Norwich City Deal commitment to deliver 40,000 dwellings by 2026, Orbit Homes also considers that an additional criteria should be added to the policy to require a review of the plan if delivery falls significantly below (e.g. below c.80%) the City Deal housing commitment.

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<sup>5</sup> 35,503 rounded to nearest 100

<sup>6</sup> 11,797 14,097 rounded to the nearest 100

<sup>7</sup> 3,957 and 6,257 rounded to the nearest 100

**Enclosure 3**

**Policy 2 – Sustainable Communities**

**Greater Norwich Local Plan  
Regulation 18 Draft Strategy Representations on behalf of Orbit Homes**

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**Policy 2 – Sustainable Communities**

Draft **Policy 2** includes several technical requirements relating to the design and delivery of sites and dwellings. The Strategy Document asks the following question on the requirements proposed to be set by this policy.

**Question 19**

**Do you support, object or have any comments relating to the specific requirements of the policy?**

Orbit Homes has the following comments to make on the specific requirements set by this policy:

Policy Requirement	Comments
<b>Development proposals are required as appropriate to:</b>	
"Respect, protect and enhance landscape character..."	There is no requirement in the NPPF for proposals to protect landscape character. This requirement only applies to 'valued landscapes' (para 170). For other landscapes there is a requirement recognise (para 170) and be sympathetic too (para 127) character. To accord with the NPPF this policy should be revised to read "Recognise and be sympathetic to landscape character..."
"Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard;"  "If the potential to set more demanding standards locally is established by the Government up to 2038, the highest potential standard will be applied in Greater Norwich."	This policy opts to set the higher optional standard for water efficiency (i.e. 110 l/p/d). This will need to be justified by viability evidence. There is no justification for requiring an unknown potential future government requirement.
"All new developments will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);"	Orbit Homes recognises that there is a need to move towards stronger measures to improve energy efficiency. However, Orbit Homes considers a national and standardised approach to strengthening requirements to be the most effective approach that balances improvements with continued delivery. Prior to the implementation of the government's Future Homes Standard, the Councils must take account of current NPPF policy that requires any local requirements to reflect national policy and technical standards.

**Enclosure 4**  
**Policy 5 - Homes**

## **Greater Norwich Local Plan Regulation 18 Draft Strategy Representations on behalf of Orbit Homes**

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### **Policy 5 – Homes**

Draft **Policy 5** outlines the proposed requirements for affordable housing provision, space standards, accessible and specialist housing and self/custom-build housing. The Strategy Document asks the following questions on these requirements.

#### **Question 27.**

#### **Do you support, object or have any comments relating to the approach to affordable homes?**

The policy sets an affordable housing requirement of at least 33% across the plan area and at least 28% in Norwich City Centre (to encourage the development of brownfield sites). Orbit Homes considers this approach to be appropriate, but would recommend that the term “at least” is removed from the policy prior to each percentage requirement. Policies on affordable housing should not seek to establish requirements as minimums. This does not provide the necessary certainty for either the decision maker or applicant as to the required level of provision.

The policy also states that 10% of the affordable homes should be for affordable home ownership. This requirement has been included to accord with NPPF paragraph 64, but is incorrect. NPPF paragraph 64 requires 10% of all the homes on major developments to be for affordable home ownership, not just 10% of the affordable housing contribution. 10% of all homes would equal 30% of the tenure split at 33% affordable housing or 36% of the tenure split at 28% affordable housing. NPPF Paragraph 64 provides two possible exceptions to setting this policy requirement:

- “unless this would exceed the level of affordable housing required in the area, ...” – This clearly wouldn’t apply in Greater Norwich;
- “... or significantly prejudice the ability to meet the identified affordable housing needs of specific groups” – There is clearly a critical need for affordable rented housing in Great Norwich and there may be an argument to provide a lower proportion of affordable home ownership on this basis, but the Greater Norwich authorities would need to provide a detailed evidence to justify this.

NPPF paragraph 64 also includes exemptions from this 10% rule for specific sites/developments for Build to Rent homes, specialist accommodation, self/custom-build homes and 100% affordable housing developments. These are important exemptions and should be included in Policy 5.

#### **Question 28.**

#### **Do you support, object or have any comments relating to the approach to space standards?**

The policy requires all dwellings to meet the nationally described space standards. Orbit Homes

recognises the good intention behind this policy, but is very concerned about its impact on the viability of affordable housing developments. As a Registered Social Landlord (RSL), Orbit Homes has access to Homes England grants to fund the delivery of affordable housing, but these grants are based on a maximum floorspace per size of dwelling (i.e. number of bedrooms) that is approximately 85% of that required to meet the nationally described space standards. Policy 5, as currently worded, would therefore have a significant negative impact on Orbit Homes' and other RSL's ability to deliver affordable housing in the area as their funding would not cover the costs of building the larger dwellings. In order to resolve this issue, we recommend that the policy is amended to allow flexibility where the grants available for affordable housing delivery would fail to fully fund the costs of delivering larger dwellings.

**Question 29.**

**Do you support, object or have any comments relating to the approach to accessible and specialist Housing?**

Policy 5 requires at least 20% of homes on major developments to be built to M4(2) accessibility standards. Orbit Homes considers this requirement to be reasonable based on the need for such dwellings in the local population.

**Question 32.**

**Do you support, object or have any comments relating to the approach to Self/Custom-Build?**

Orbit Homes does not object to setting a percentage requirement for self/custom-build dwellings in principle, but consider that any requirement set needs to be sufficiently evidence based. The Councils' self-build registers should provide a broadly accurate indication of demand for self-build plots (although there may be some duplication with people registering in more than one authority) and also of the type of plots in demand. This data should be used to inform the policy. Paragraph 250 notes that at present there are 113 people on the self-build register for the Greater Norwich Area. Given the number of sites which would be required to meet this policy then it is likely that the number of plots will far exceed demand. We are also aware from other LPA's self-build registers that the actual demand for self-build plots has been for individual plots in rural locations, as opposed to plots on suburban housing estates. We therefore recommend that in addition to reviewing the percentage requirement, additional flexibility is allowed for the development of self/custom-build dwellings on sites adjoining existing settlements.

**Question 33.**

**Are there any topics which have not been covered that you believe should have been?**

The policy does not contain any guidance on the required housing size mix. We would expect this to be included and Orbit Homes favours a flexible approach in this regard that requires broad accordance with the latest SHMA evidence.



**Enclosure 5**

**Policy 7.2 – The Main Towns**

## **Greater Norwich Local Plan Regulation 18 Draft Strategy Representations on behalf of Orbit Homes**

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### **Policy 7.2 – The Main Towns:**

Draft Policy 7.2 sets the approach to development in the main towns of Aylsham, Diss, Harleston, Long Stratton and Wymondham. The Strategy Document asks the following questions.

#### **Question 41.**

**Do you support or object or wish to comment on the approach for the mains towns overall? Please identify particular issues.**

As set out in Orbit Homes' representations to Policy 1, the proposed spatial strategy for allocating additional growth in the GNLP focusses a significantly higher proportion of total growth to the proposed village clusters and a lower proportion of growth to the Norwich urban area compared to existing commitments, while the strategy for the Main Towns and Key Services Centres remains broadly similar. In particular, the Main Towns continue to be allocated a comparatively low level of growth. These settlements form the second tier in the settlement hierarchy and are the most sustainable options for growth outside Norwich and yet are allocated just 14.5% of total growth during the plan period. This strategy fails to take full advantage of the potential of these settlements to sustainably grow and meet the housing needs of their catchment areas.

In addition to the current spatial strategy not recognising the potential of the main towns to sustainably accommodate higher levels of growth, Orbit Homes' representations to Policy 1 also identifies a need to allocate an additional 4,000 to 6,300 dwellings above those currently proposed to be allocated in the GNLP. In order to meet this requirement, it would clearly be unsustainable to allocate additional high levels of growth to smaller rural settlements and Orbit Homes' are concerned that due to significant existing commitments, any significant additional growth in the urban area may suffer from deliverability issues. We therefore consider that a higher proportion of the increased housing requirement should be directed to deliverable sites in the Main Towns.

#### **Question 42.**

**Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with parts of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.**

Orbit Homes objects to the approach to development in Long Stratton, which proposes to allocate no additional dwellings above existing commitments to the town. The supporting text to the policy explains the reasoning for this decision at paragraph 326:

*"Due to the scale of the existing commitment in Long Stratton, which will both provide a by-pass and the growth of services supporting its classification as a main town, this plan does not make further allocations in addition to Long Stratton's Area Action Plan (AAP). Evidence shows that the scale of the commitment means that parts of the site allocated in the AAP will not be*

*delivered until after 2038. There may be further potential capacity for development within the existing allocation, beyond the 1,875 homes that are the subject of current planning applications; however, these would be unlikely to be delivered until late in the plan period, or beyond.”*

The justification provided is therefore that because Long Stratton is allocated to grow by c.1,800 homes in the current Joint Core Strategy (2011) and Area Action Plan (2016), it should not be allocated any additional dwellings. This is not a justifiable approach as it fails to accept the failure of the 1,800 home allocation to deliver any new homes despite being a key component of the current development plan and not the emerging Local Plan. The reality of the situation is that the 1,800 home allocation is likely to continue to be much delayed and its failure to progress has meant that Long Stratton has had very little growth over the last 10 years and certainly below the level of growth appropriate for an aspiring new town. Growth is needed now to meet current pent up needs, including a critical need for affordable housing, and deliverable sites should not be prevented from coming forwards to meet this need just because a large housing allocation that remains fundamentally stalled may at some point start to deliver dwellings in the town. The unreasonableness of this justification is further demonstrated by the fact that Wymondham, which was similarly allocated significant growth in the JCS, but where a significant proportion of this growth has been delivered, is proposed to accommodate a further 100 dwellings and a potential 1,000 dwelling contingency site in the GNLP. Long Stratton by comparison is prevented from being allocated further much needed growth due to the failure of the existing allocation.

The key issue with the delivery of the 1,800 allocation in Long Stratton is that it is reliant on the delivery of a new bypass before the occupation of the 250th new dwelling, but the development is unable to viably deliver this bypass without significant government funding and no decision on this funding has yet been made. Planning applications have been submitted for the allocation, but they cannot be approved until the bypass has been secured. It was initially predicted that the site would have delivered 420 dwellings by the end of 2019/20 (and would now be delivering 230 dwellings per year) <sup>1</sup> and yet it has so far failed to deliver any dwellings and is highly unlikely to start delivering for several years (if at all). In this context, it is essential that the GNLP recognises the need for growth in Long Stratton and takes the opportunity to allocate additional growth to the town to help meet the increased housing requirement identified in Orbit Homes’ representation to Policy 1.

The need to identify an additional deliverable housing site is therefore particularly acute in Long Stratton and as set out in Orbit Homes’ representations to the Site Document for Long Stratton, Land south of St Mary’s Road, Long Stratton (ref. GNLP0509) is the only option that has been consistently assessed as suitable by the Council. It therefore essential that it is allocated to meet current local needs as soon as possible.

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<sup>1</sup> Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2014-15 – Appendix A – Greater Norwich area Five-year supply of housing assessment, December 2015

**Enclosure 6**

**GMLP0509 – Land south of St Mary’s Road, Long Stratton**

## **Greater Norwich Local Plan Regulation 18 Draft Sites Document Representations on behalf of Orbit Homes**

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### **GNL0509 – Land south of St Mary’s Road, Long Stratton**

Orbit Homes object to the identification of Land south of St Mary’s Road, Long Stratton (ref. GNL0509) (henceforth ‘the site’) as an ‘unreasonable site’. This conclusion is not justified by the Council’s own evidence and clearly fails to reflect the sustainability of this site to deliver much needed new homes in the town. This document sets out a background to the site, raises Orbit Homes’ serious concerns regarding the assessment of the site and provides a summary of the promoted development. It should be read alongside Orbit Homes’ representations to draft Policy 1 and draft Policy 7.2 of the Strategy Document. These representations demonstrate that, due to significant under delivery during the Joint Core Strategy plan period (caused by stalled development on many large sites), the Greater Norwich authorities will not meet their City Deal commitment to deliver 40,000 new homes by 2026 unless significant additional allocations on deliverable sites are identified. One such large site that has stalled is the 1,800 home allocation in Long Stratton.

Long Stratton was first allocated 1,800 new homes in the Joint Core Strategy in 2011 and land to the north and east of Long Stratton was allocated to meet this requirement in the Long Stratton Area Action Plan in 2016. Despite this long lead in time and initial predictions that the site would have delivered 420 dwellings by the end of 2019/20 (and would now be delivering 230 dwellings per year)<sup>1</sup>, this site has so far failed to deliver any dwellings! The key issue with its delivery is that it is reliant on the delivery of a new bypass before the occupation of the 250th new dwelling, but the development is unable to viably deliver this bypass without significant government funding and no decision on this funding has yet been made. Planning applications have been submitted for the allocation, but they cannot be approved until the bypass has been secured. The reality of the situation is therefore that the 1,800 home allocation is likely to continue to be much delayed and its failure to progress has meant that Long Stratton has had very little growth over the last 10 years. This growth is needed now to meet current pent up needs and in particular a critical need for affordable housing to meet local needs.

The need to identify an additional deliverable housing site is therefore particularly acute in Long Stratton and these representations demonstrate that our client’s site is the only option that has been consistently assessed as suitable by the Council. It therefore essential that it is allocated to meet current local needs as soon as possible.

### **Background**

The site has been promoted for residential development by Orbit Homes since 2016 through both the emerging Greater Norwich Local Plan, a planning application for a proposed development of 52 dwellings and a subsequent appeal:

- **Local Plan Promotion:** The site was submitted to the Call for Sites consultation between May-July 2016 for a proposal of 60-100 dwellings and representations were submitted to the options consultation between Jan-March 2018 to reduce the proposal to 52 dwellings.

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<sup>1</sup> Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2014-15 – Appendix A – Greater Norwich area Five-year supply of housing assessment, December 2015

- **Planning Application:** A planning application (ref. 2017/0810) for 52 dwellings and large areas of open space was submitted by Orbit Homes in March 2017 and **recommended for approval by officers at Planning Committee on 12th September 2018**. Despite the officer's recommendation, the application was refused by members in spite of the Council's lack of 5 year housing supply.
- **Planning Appeal:** An appeal was submitted on 29th October 2018 and a Planning Inquiry held between 2nd-4th July 2019. Ahead of the Inquiry, the Council's housing land supply improved to a point where it could demonstrate a 5 year supply. In this context, the Inspector dismissed the appeal on 23rd August 2019 for reasons relating to conflict with the locational policies in the development plan and some limited landscape/visual harm caused by the open space proposed on the western of the site's two fields. At paragraph 34 of the Inspector's decision<sup>2</sup> she does, however, identify the **critical need for affordable housing delivery** and the uncertainty over affordable housing delivery at the 1,800 home allocation. She states that:

*"The strategic allocation is expected to deliver policy compliant affordable dwellings, yet at this time, the numbers are unknown and are subject to viability testing given the objective that the allocation will partially fund the bypass. Consequently, in this context, there is a current undersupply of affordable dwellings both in Long Stratton and the wider housing market area. For this reason, **I attach significant weight to the delivery of affordable housing in this scheme.**"*

## Objection to Site Assessment Process

The Site Assessment Booklet for Long Stratton demonstrates that the site was assessed as the most sustainable option for growth in the town in stages 1 to 6 of the assessment, but despite this it was discounted with little evidence or justification at stage 7. We have provided a summary of the site's assessment in Table 1 below.

Table 1. Summary of Site Assessment for Land south of St Mary's Road, Long Stratton (ref. GNLP0509)

Stage	Summary of Assessment
<b>1. List of Sites Promoted</b>	Stage 1 simply lists the seven sites promoted in Long Stratton.
<b>2. HELAA Comparison Table</b>	Stage 2 presents a comparison of the HELAA assessment for each promoted site. <b>The site is assessed as Green for all 14 site assessment categories</b> , whereas all the other promoted sites are assessed as Amber for 4 or more categories.
<b>3. Consultation Comments</b>	The site is the <b>only promoted site to have received no objections</b> during the last two Local Plan public consultations.
<b>4. Discussion of Submitted Sites</b>	The site is <b>identified as a reasonable alternative</b> .
<b>5. Shortlist of Reasonable Alternatives for Further Assessment</b>	Confirms Land south of St Mary's Road (ref. GNLP0509) as <b>one of 3 sites considered to be a reasonable alternatives</b> .
<b>6. Detailed Site Assessments of</b>	Summarises the HELAA conclusion that the site

<sup>2</sup> Appeal Ref: APP/L2630/W/18/3215019 | Land off St Mary's Road, Long Stratton | 23 August 2019

Stage	Summary of Assessment
<p><b>Reasonable Alternative Sites</b></p>	<p>is suitable in all respects and presents the views of key consultees:</p> <ul style="list-style-type: none"> <li>• <b>Highways:</b> Confirms site is suitable.</li> <li>• <b>Development Management:</b> States that <i>"If an additional site is required <b>St Mary's Rd is the reasonable option</b> however due to the outstanding appeal this is a politically sensitive site"</i> and discounts the other reasonable alternatives due to site constraints.</li> <li>• <b>Minerals &amp; Waste:</b> No safeguarded mineral resources.</li> <li>• <b>Lead Local Flood Authority:</b> No comment.</li> </ul>
<p><b>7. Settlement Based Appraisal of Reasonable Alternative Sites and Identification of Preferred Site/s (Where Appropriate)</b></p>	<p>States that due to the scale of existing commitments there will be no new allocations in the GNLP and that there is considered to be no reasonable alternative to this approach.</p> <p>It then goes on to states all seven promoted sites <i>"have been dismissed on highway and landscape grounds, as well as relation to the existing built form and ability to provide a safe route to school"</i>.</p> <p>For Land south of St Mary's Road (ref. GNLP0509) it states that: <i>"This site is not considered to be suitable for allocation as a planning refusal for 52 homes and open space was recently upheld at appeal. The existing level of commitment in Long Stratton through the Area Action Plan is high, limiting the need for additional sites."</i></p>

It is clear from the summary in Table 1 that Land south of St Mary's Road, Long Stratton (ref. GNLP0509) was **assessed as a suitable and indeed preferred option at each stage of the assessment** process up until the final stage 7. The published Site Assessment Process Methodology describes stage 7 as follows:

*2.11 The steps outlined above have built up a comprehensive picture of all the shortlisted 'reasonable alternative' sites. The purpose of Stage 7 is **to pull all this information together and show how the preferred option/options have been arrived at.***

*2.12 As a result of the discussions that have taken place at Stages 5 and 6 in the process not all the 'reasonable alternative' sites identified at Stage 5 will go on to be preferred options or reasonable alternatives in the draft plan. For many sites further investigation will have flagged up some concerns which will lead to them being deemed as unreasonable sites in the draft plan.*

It is clear from this that the purpose of stage 7 is to pull together the information presented in previous stages and in particular to present any conclusions following issues identified at stages 5 and 6. As set

out above, stage 5 confirms that Land south of St Mary's Road, Long Stratton (ref. GNLPO509) is one of three reasonable alternatives and **stage 6 identifies that it is the preferred option out of these alternatives, with the only other options being discounted** due to being 'too constrained' and too close to Tharston Industrial Estate. Using the Council's own methodology, there is therefore no reason for the site to be identified as an 'unreasonable alternative' and it **should instead be identified as the most sustainable and only suitable option for additional development in the town.**

Despite the above and the obvious conclusion that the site should be allocated for the proposed residential development, the site is discounted for the following dubious reasons:

- 1. No new allocations are proposed in Long Stratton:** This is not a reason to discount an individual site from being considered suitable as the assessment of sites should be separate from the identification of need. Furthermore, the strategy for Long Stratton is not fixed and as set out in Orbit Homes' representations to draft Policy 1 and draft Policy 7.2, there is a particularly acute need in Long Stratton for additional deliverable sites to come forward in the short term. It is therefore highly inappropriate to discount options that are otherwise sustainable at this stage and the Councils should instead have taken the approach of identifying preferred sites to meet all potential growth options.
- 2. All seven promoted sites "have been dismissed on highway and landscape grounds, as well as relation to the existing built form and ability to provide a safe route to school": This is quite simply incorrect!** At no point in the assessment of the site was it discounted on any of these grounds. In fact, the site was positively assessed in the HELAA and all subsequent assessments for each of these criteria and was the only site in Long Stratton not to have been discounted at any point.
- 3. "This site is not considered to be suitable for allocation as a planning refusal for 52 homes and open space was recently upheld at appeal":** The refusal of the appeal is not a justifiable reason for discounting the site. In accordance with NPPF paragraph 31, the preparation of Local Plans should be evidence based and not simply take previous decisions out of context. The appeal was dismissed due primarily to the Council's improved 5 year housing land supply position which meant that the Inspector could no longer apply the tilted balance in favour of the proposal and needed to apply more weight to the conflict with the locational policies in the adopted development plan and the minor/moderate landscape/visual harm identified. The consideration was therefore one of weighing the conflict with adopted policy and was quite different from the assessment of whether or not the site should be allocated in emerging policy, which by its very nature removes the conflict with current settlement boundary policies. In addition, the minor/moderate landscape/visual harm reason for dismissing the appeal, should justifiably fall away in any assessment of the site as an emerging allocation as there is a need to allocate greenfield land to meet the emerging housing requirement and this level of harm would apply to any greenfield site adjoining the settlement boundary.

### **Promoted Development**

The site is promoted for a high quality residential development of market and affordable dwellings, with associated car parking and amenity space, roads, public open space, landscaping and vehicular access off St Mary's Road. The proposed development is shown on the plans at **Appendix 1** and comprises:

- The erection of 52 dwellings comprising a mix of 1, 2, 3 and 4 bedroom houses and bungalows;
- 33% affordable housing (17no. units) to help meet the critical local need;
- Vehicular access off St Mary's Road with a Type 3 road connecting to type 6 roads and private drives;

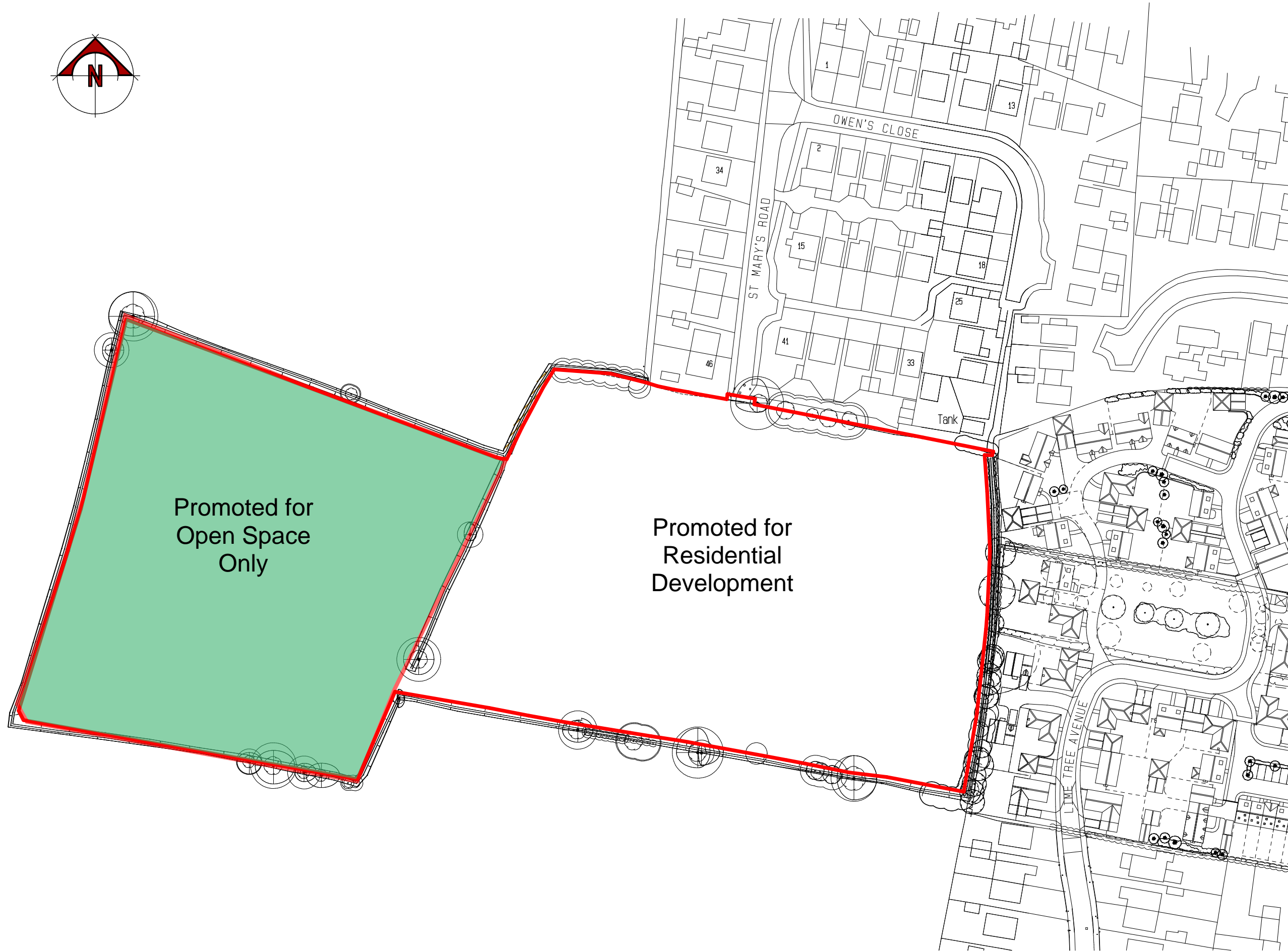
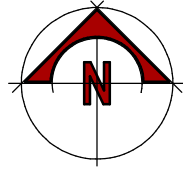


- Continuation of footpaths from St Mary's Road into the site to provide pedestrian accessibility to Flowerpot Lane and thereafter Manor Road enabling access to nearby schools and the centre of Long Stratton;
- A 1,795m<sup>2</sup> (0.18ha) Locally Equipped Area for Play (LEAP) with a minimum activity area of 400m<sup>2</sup> (0.04ha) located in the centre of the site;
- A potential 14,600m<sup>2</sup> (1.46ha) area of public open space located to the west of the proposed residential development providing publicly accessible natural green space for which there is a significant shortage in the town. It was agreed during the appeal that the inclusion of this land in the proposal would deliver added benefits, but this land could equally be excluded from any allocation if found to be surplus to requirements;
- The retention and enhancement of existing boundary planting and additional site wide landscaping including extensive tree planting as shown in further detail on the Tree Strategy Plan (Ref: 6033/TSP/ASP6); and
- Off-site footway improvements along the south side of Flowerpot Lane as shown on submitted Visibility Splay drawing (Ref: 161379 CL-02 Rev P1).

As should be clear from the above detail, the promoted development is shovel ready and could be delivered in the short term to meet Long Stratton's needs now. The proposed development was recommended for approval by officer's at application stage and only dismissed at appeal due to conflict with the settlement boundary policies of the adopted Local Plan and minor/moderate landscape/visual harm that would apply to any greenfield site allocation on the edge of the settlement boundary. Both these reasons clearly fall away in the assessment of the site as a potential housing allocation.

The site has consistently been identified as the most sustainable option for development in Long Stratton and in the context of the clear need for additional allocations in the town, it should be allocated accordingly.

## **Appendix 1. Plans of Proposed Development**



**NOTES**

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**REVISIONS**

REV	DATE

CLIENT:



PROJECT:

RESIDENTIAL DEVELOPMENT,  
 ST MARYS ROAD,  
 LONG STRATTON

DRAWING TITLE:

SITE LOCATION PLAN

SCALE - 1:1250 @ A3

DATE - MAR. 2017

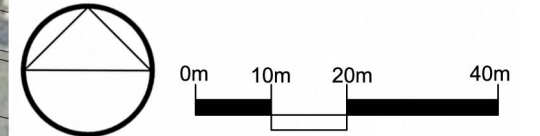
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JOB NO.	DWG NO.	REV.
6910	LOC01	-

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- Key:
- Application Site Boundary
  - Proposed Trees
  - Bench
  - Dog Litter Bin
  - Timber Post & Rail Fence



Footpath taken through woodland planting

Boundaries to open space reinforced with native hedgerow and treated timber post &

Note: Existing & proposed vegetation will form a green wildlife corridor in an east-west direction

Circular walking route

Grass mounds

Car Parking area

Native shrub planting

Leap Play Area

Link to new footpath option A

Timber boardwalk taken over wetland zone with aquatic and emergent planting as well as wetland meadow planting to create a diverse & visually aesthetic setting

Link to new footpath option B

Wildflower grassland with mown paths taken through

REV	DATE	NOTE	DRAWN	CHK'D
F	14.5.18	Updated to Comments	SB	JM
E	4.5.18	Amendment to Annotations	JM	
D	9.4.18	Amendment to Annotations	JM	
C	5.4.18	Updated to New Layout. Incorp MUGA.	SLB	JM

aspect landscape planning

TITLE  
 Land at St Mary's Road, Long Stratton  
 Landscape Masterplan Op B

CLIENT  
 Orbit Homes

SCALE	DATE	DRAWN	CHK'D
1:1000@A3	MAY 2019	SB	AM

DRAWING NUMBER	REVISION
6033 / SK02 / ASP3	F

Schedule of Provision:

- Wildflower Grassland: Approx: 3,615m<sup>2</sup>
- Woodland: Approx: 7,425m<sup>2</sup>
- Footpaths: Approx: 395m
- Parking Spaces: 6
- Total POS: Approx: 14,880m<sup>2</sup>

**Street and Avenue Trees**



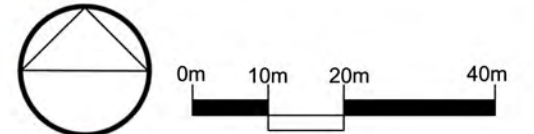
**Focal Point Trees**



**Native Trees**



NOTES:  
Based upon the Ordnance Survey map with permission of The Controller of Her Majesty's Stationery Office, © Crown Copyright.  
Aspect Landscape Planning Ltd, West Court, Hardwick Business Park, Norall Way, Banbury OX16 2AF.  
Licence 100045345  
Aerial map data © 2012 Google  
Copyright reserved  
No Dimensions to be scaled from this drawing.



- Key:**
- Application Site Boundary
  - Existing Trees
  - Proposed Street and Avenue Trees
  - Proposed Focal Point Trees
  - Proposed Native Trees

**Suggested Tree Palette**

**Suggested Street and Avenue Trees**

- 'Streetwise' Field Maple (Acer 'Streetwise')
- Purple Birch (Betula p. 'Purpurea')
- Fastigate Hornbeam (Carpinus 'Fastigiata')
- 'Evereste' Apple Tree (Malus 'Evereste')

**Suggested Focal Point Trees**

- Sweetgum (Liquidambar styraciflua)  
Semi-mature, girth: 20-25 cm, height: 5.0-5.5m

**Suggested Native Trees**

- Field Maple (Acer campestre)
- Birch (Betula pendula)
- Hornbeam (Carpinus betulus)
- Crab Apple (Malus sylvestris)
- Sweet Cherry (Prunus avium)
- Oak (Quercus robur)
- Rowan (Sorbus aucuparia)

The proposals present an opportunity to introduce at least 45 new trees within the context of the residential site. These will mitigate for the trees proposed to be removed and also create a high quality landscaped setting for the proposals. This does not include the opportunities for new woodland planting as part of the open space proposals to the west.

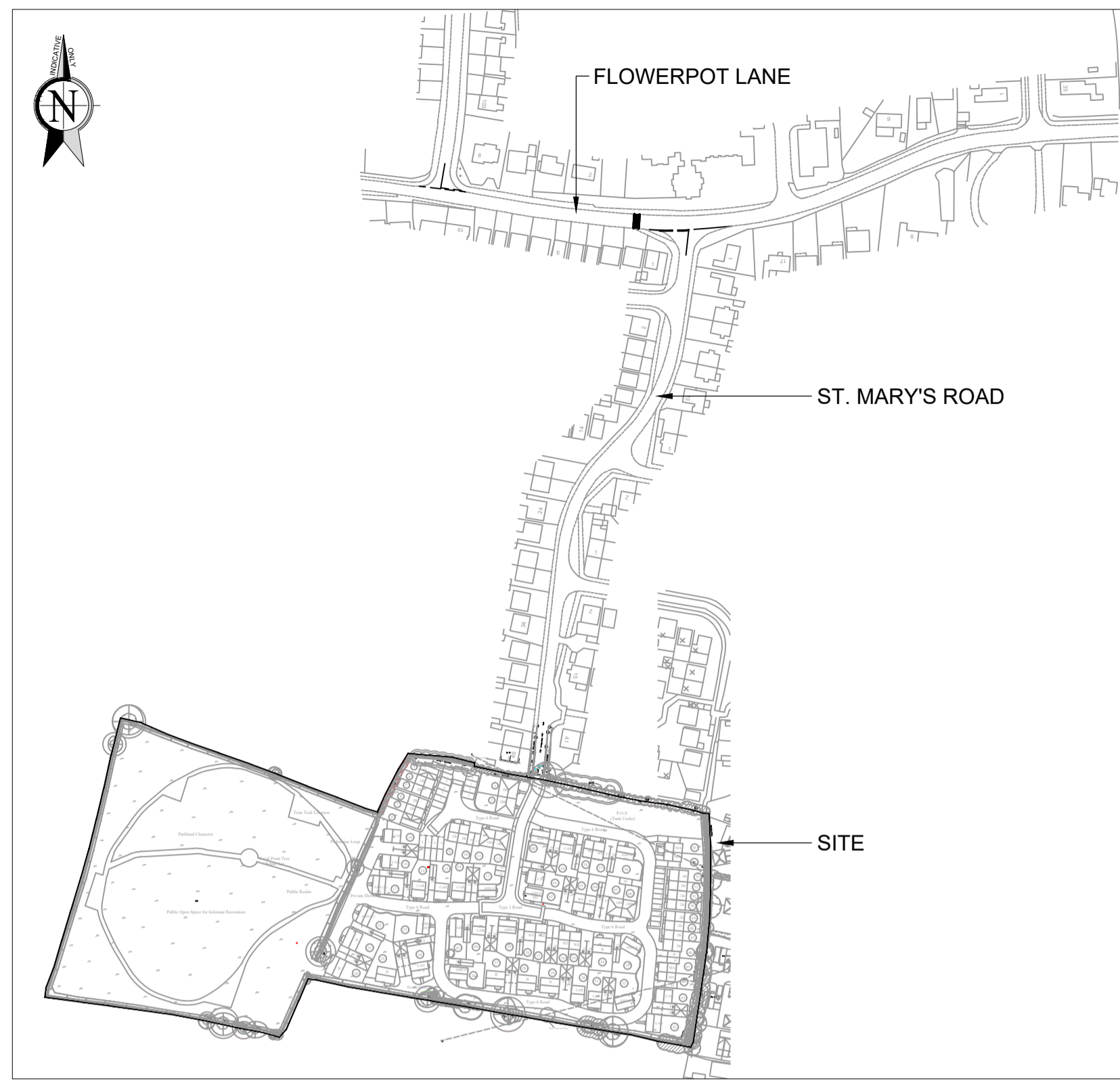
REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				



TITLE  
**Land at St Mary's Road, Long Stratton  
Tree Strategy Plan**

CLIENT  
**Orbit Homes**

SCALE	DATE	DRAWN	CHK'D
1:1000@A3	OCT 2018	SFB	AM
DRAWING NUMBER		REVISION	
6033 / TSP / ASP6		-	



**KEY PLAN**  
SCALE 1:2500

**FOOTWAY NOTES:**

1. NEW FOOTWAY IS SUBJECT TO AGREEMENT WITH N.C.C. HIGHWAYS.
2. EXISTING TREES TO BE ASSESSED AND SPECIAL MEASURES IMPLEMENTED WHERE REQUIRED IN RPA'S.
3. EXISTING STREET LIGHTING COLUMN TO BE MOVED TO REAR OF FOOTWAY.
4. EXISTING BT POLE MAY NEED ADDITIONAL SUPPORT DUE TO UNDERMINING.
5. EXISTING 'CHILDREN' WARNING SIGN TO BE MOVED TO REAR OF NEW FOOTWAY.
6. WIDTH OF FOOTWAY AND RETAINED HEIGHT TO BE CONFIRMED BY TOPOGRAPHICAL SURVEY.
7. SCHEME IS TO BE SUBJECT TO SAFETY AUDIT. ADDITIONAL MEASURES MAY BE REQUIRED TO ADDRESS SCHOOL CHILDREN CROSSING AWAY FROM ZEBRA CROSSING LOCATION.

**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION BOX**  
NOTES: THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RISK REGISTER PRODUCED FOR INCLUSION IN THE HEALTH AND SAFETY PLAN. THE HAZARDS NOTED ARE IN ADDITION TO THE NORMAL HAZARDS AND RISKS FACED BY A COMPETENT CONTRACTOR WHEN DEALING WITH THE TYPE OF WORKS DETAILED ON THIS DRAWING.

**CONSTRUCTION RISKS:**  
• NO SIGNIFICANT RISKS.

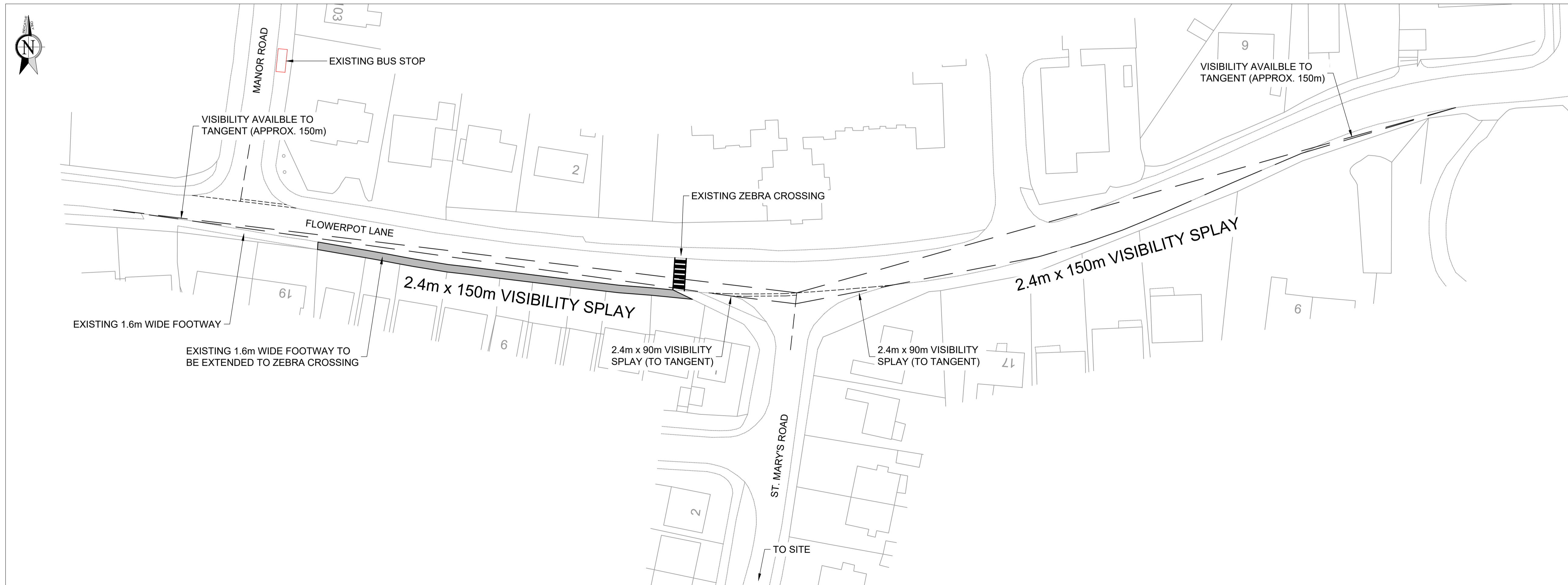
**MAINTENANCE/CLEANING RISKS:**  
• NO SIGNIFICANT RISKS.

**DEMOLITION RISKS:**  
• NO SIGNIFICANT RISKS.

**NOTE:**

1. DO NOT SCALE, IF IN DOUBT ASK.
2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEER'S DRAWINGS AND DETAILS, THE SPECIFICATION FOR THE WORKS, THE RELEVANT ARCHITECT'S DRAWINGS AND ANY OTHER SPECIALISTS' DRAWINGS.
3. ANY DISCREPANCIES FOUND ON THIS OR ANY OTHER DRAWINGS ARE TO BE REPORTED TO AND RESOLVED BY ROSSI LONG CONSULTING BEFORE THE COMMENCEMENT OF ANY WORK RELEVANT TO THE DISCREPANCY.
4. THE PRINCIPAL CONTRACTOR IS TO PROVIDE FULLY DESIGNED PROPPING/SHORING TO FACILITATE THE WORKS. ALL PROPPING & BRACING IS TO BE ADEQUATELY FOUNDED TO ENSURE THE STABILITY/INTEGRITY OF THE EXISTING/PROPOSED STRUCTURES &/OR EARTHWORKS IS MAINTAINED. UNLESS INDICATED ON THE DRAWINGS, THE TEMPORARY WORKS ARE NOT TO IMPOSE REACTIONS ON THE PERMANENT STRUCTURE WITHOUT PRIOR WRITTEN CONSENT FROM ROSSI LONG CONSULTING.
5. THIS DOCUMENT HAS BEEN PREPARED IN ACCORDANCE WITH THE SCOPE OF ROSSI LONG CONSULTING'S APPOINTMENT WITH ITS CLIENT AND IS SUBJECT TO THE TERMS OF THAT APPOINTMENT. ROSSI LONG CONSULTING ACCEPTS NO LIABILITY FOR ANY USE OF THIS DOCUMENT OTHER THAN BY ITS CLIENT AND ONLY FOR THE PURPOSES FOR WHICH IT WAS PREPARED AND PROVIDED. ONLY WRITTEN DIMENSIONS SHALL BE USED.

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**VISIBILITY PLAN**  
SCALE 1:500

**PRELIMINARY DRAWING:**  
THIS DRAWING IS FOR PRELIMINARY PURPOSES ONLY AND MUST NOT BE READ AS A CONSTRUCTION ISSUE. IT INDICATES DESIGN INTENT ONLY AND IS SUBJECT TO AMENDMENT DURING FINAL DESIGN DEVELOPMENT.

REV	DESCRIPTION	DATE	BY	AUTH
	PRELIMINARY ISSUE.	19.09.17	GM	NH



16 Meridian Way, Norwich, Norfolk, NR7 0TA  
T: 01603 706 420 F: 01603 706 421 www.rossilong.co.uk

CLIENT  
**ORBIT HOMES**

PROJECT  
**RESIDENTIAL DEVELOPMENT  
ST MARYS ROAD  
LONG STRATTON**

TITLE  
**VISIBILITY SPLAY**

DRAWN	AUTHORISED	DATE	SCALE AT A1
GM		19.09.17	AS SHOWN
PROJECT NO.	DRAWING NO.	REV	
161379	CL-02	P1	

STAGE:  
**PRELIMINARY**

**Enclosure 7**

**Policy 7.4 – Village Clusters – including:**

- **Land to the north of Ransome Avenue, Scole; and**
- **Land north of Church Road, Tasburgh**

## **Greater Norwich Local Plan Regulation 18 Draft Strategy Representations on behalf of Orbit Homes**

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### **Policy 7.4 – Village Clusters**

Draft Policy 7.4 sets out the approach to development in smaller settlements below the level of key service centres. It proposes to allocate growth to these settlements on the basis of allocations to village clusters as opposed to individual settlements. These proposed clusters are based on primary school catchments, which the plan states provide a proxy for social sustainability. The Strategy Document asks the following questions.

#### **Question 45.**

**Do you support or object or wish to comment on the overall approach for village clusters?  
Please identify specific issues.**

Orbit Homes objects to the approach in South Norfolk to produce a separate a separate South Norfolk Village Clusters plan. This approach significantly undermines strategic approach to delivery in these settlements and cannot be considered to be in accordance with paragraphs 17 – 22 of the NPPF which make clear that strategic policies should make sufficient provision for housing and should provide a clear strategy for bringing sufficient land forward to address objectively assessed needs over the plan period. Orbit Homes recognises that the NPPF allows for non-strategic policies to be covered in separately where they set out more detailed policies for specific areas. However, the scale of growth attributed to the Village Clusters plan (at 1,200 homes or c.15% of all new allocations) is clearly of a strategic scale and to proceed to allocate such a significant level of growth to the village clusters without an assessment of the ability of these villages to accommodate this growth is clearly a flawed approach. Orbit Homes considers that in order to accord with the NPPF, allocations in the village clusters must be brought back into the GNLP and based on a thorough assessment of need and capacity.

#### **Question 46.**

**Do you support or object or wish to comment on the approach for specific village clusters?  
Please identify particular issues.**

Orbit Homes has an interest the following sites within village clusters in South Norfolk:

- **Policy SCO 1: Land to the north of Ransome Avenue, Scole** – 1.02 ha allocated in the Site Specific Allocations and Policies Document (2015) for approximately 15 dwellings, but with the capacity to sustainably accommodate up to 35 dwellings and promoted for this increased level of development to the GNLP Call for Sites in 2016 (ref. GNLP0511).
- **Policy TAS 1: Land north of Church Road and west of Tasburgh school** – 1.14 ha allocated in the Site Specific Allocations and Policies Document (2015) for approximately 20 dwellings, but with the capacity to sustainably accommodate approximately 35 dwellings. Not yet promoted through the GNLP – please see site submission form attached at **Appendix 1**.

Both these sites are currently allocated for residential development, but at a level of development that



does not reflect their true capacity and fails to make the most efficient use of land in accordance with the NPPF. The reason behind the under-allocation of these sites is that the adopted Joint Core Strategy only allocated 10-20 dwellings to each Service Village. It is clear, however, that as a comparatively large villages with a primary schools, Scole and Tasburgh will be core villages in their village clusters and should therefore be allocated additional growth. In this respect, the most sustainable solution to the growth of these settlements should be to maximise the efficient use of land on existing allocations before looking at releasing additional green field land.

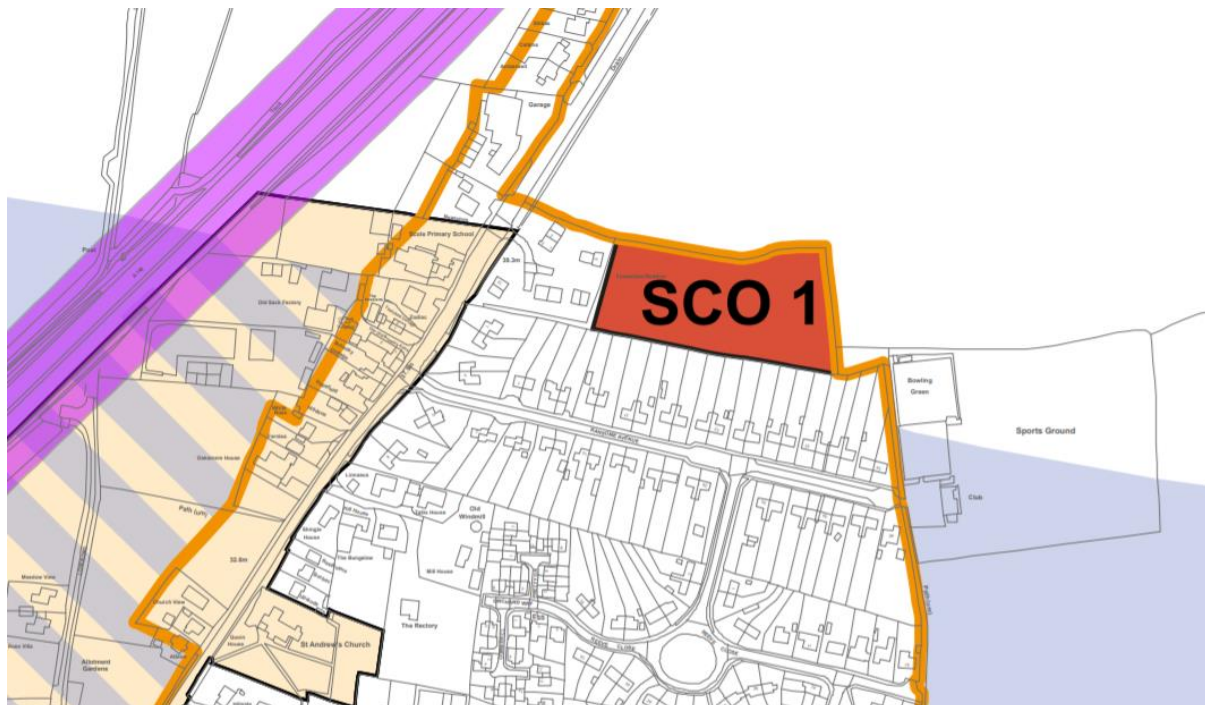
### **Policy SCO 1 / GNL0511 – Land east of Norwich Road, north of Ransome Avenue, Scole**

#### Site Description

The site comprises undeveloped greenfield land approximately 1 hectare in size located on the northern edge of the Service Village of Scole in South Norfolk District. It is approximately 0.5km from the village centre and opposite Scole Primary School. There is existing high density single and two storey residential development to the south and open fields to the north and east.

Directly adjoining the site to the west is a rural exception site of 12 affordable dwellings approved under planning permission reference 2009/1991 and delivered by Orbit Homes. Scole Park is located to the south east of the site.

The site is of open aspect and flat. There are no known ground condition issues associated with the site. It is located entirely within Flood Zone 1 defined as areas in which flooding is very unlikely to occur. It is not within a Conservation Area and there are no listed buildings in close proximity. There are no Tree Preservation Orders or statutory or non-statutory designated ecological sites within the site. The site is bounded by hedgerows which provide natural definitions to development.



*Figure 1. Adopted Policies Map showing location of Policy SCO 1*

#### Proposed Development

The site is promoted for continued residential allocation of up to 35 dwellings (increased from approx. 15 in the adopted development plan) including affordable housing. Access is available via the adjacent affordable housing development which Orbit Homes retain control over. The accompanying draft layout

(Appendix 2) shows 32 dwellings and provides an indication of how the site could be developed which includes a footpath link proposed to the Norwich Road which leads to the village centre and primary school opposite. A further pedestrian link is proposed through the south east corner of the site in order to provide access to Scole Park.

In light of the need to make more efficient use of land, provide a development which is reflective of the density and pattern of surrounding development and in the context of the NPPF's overall imperative to make effective use of land, it is considered that the site should be allocated for an increased number of units to that suggested in the current allocation to include smaller houses and bungalows to meet local needs.

Existing hedgerows can be retained and enhanced and additional planting would result in ecological betterments and would ensure that the development on the site would have a limited impact on the open countryside and landscape of the surrounding area.

#### GNLP Assessment

The Site Proposals document consulted on between January and March 2018 concludes that:

*"Overall, if Scole is identified as a location for additional housing and depending on the scale of additional housing required, site 0511 offers the potential to increase the density on an existing allocation located close to the school and other services. This site appears to be the least constrained in comparison to other submitted sites".*

In accordance with this assessment, Orbit Homes requests that the site is reallocated in the emerging GNLP for up to 35 dwellings.

### **Policy TAS 1 – Land north of Church Road and west of Tasburgh school, Tasburgh**

#### Site Description

The site comprises undeveloped greenfield land of just over 1 hectare in size located on the north western edge of the Service Village of Tasburgh in South Norfolk District. It adjoins existing development on three sides with Preston Primary School and estate development to the southeast and lower density residential development to the west and northwest. This leaves just a narrow north eastern boundary that adjoins open countryside that is well screened by existing vegetation.

The site is of open aspect and slopes gently up from Church Road towards the northeast. There are no known ground condition issues associated with the site. It is located entirely within Flood Zone 1 defined as areas in which flooding is very unlikely to occur. It is not within a Conservation Area, but is in relatively close proximity to Old Hall Farmhouse Grade II Listed Building and to a Scheduled Ancient Monument. There are no Tree Preservation Orders or any significant trees on site, nor any statutory or non-statutory designated ecological sites within the site.

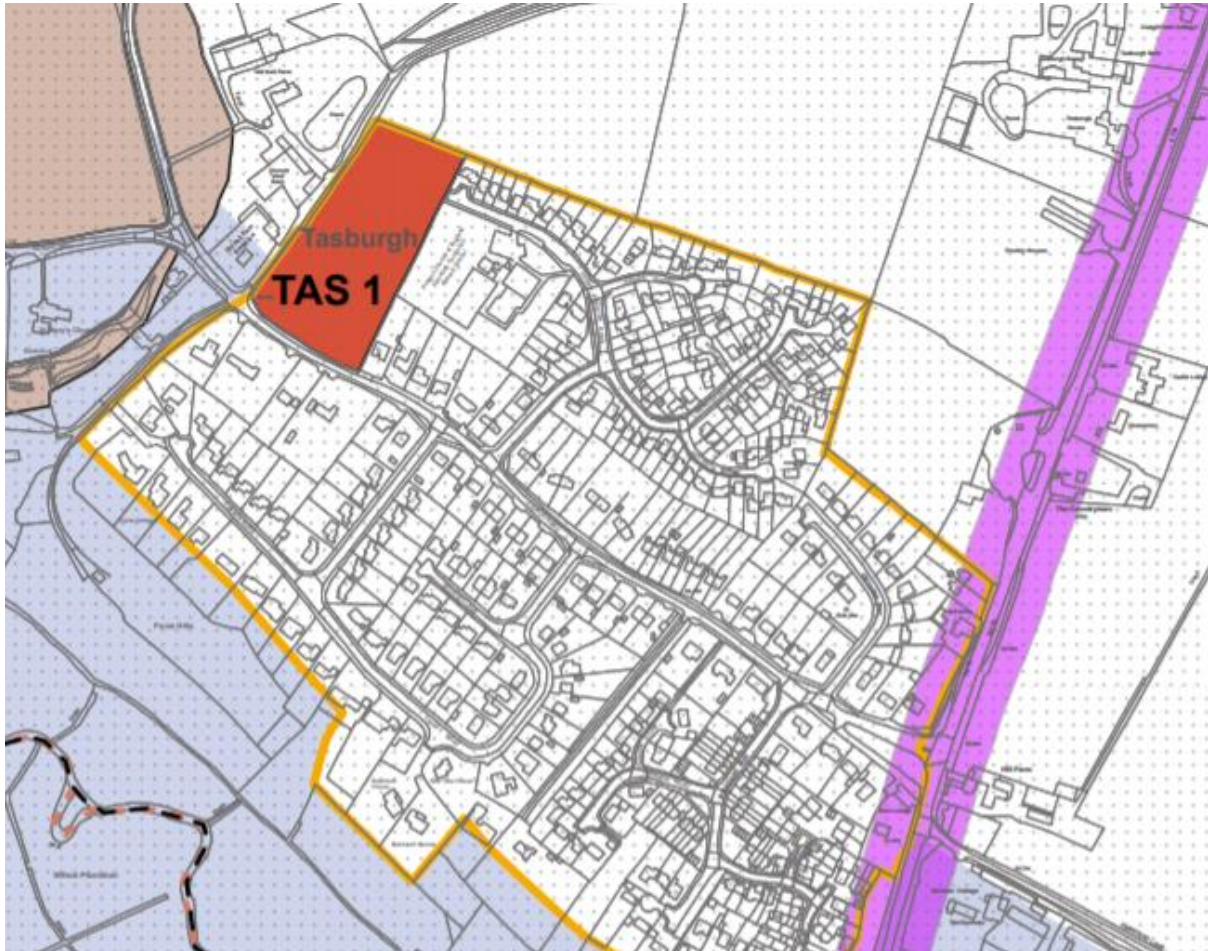
#### Proposed Development

The site is promoted for continued residential allocation of up to 35 dwellings (increased from approx. 20 in the adopted development plan) including affordable housing and open space. Access is available from Church Road and there is potential to provide a pedestrian connection to Henry Preston Road.

In light of the need to make more efficient use of land, provide a development which is reflective of

the density and pattern of surrounding development and in the context of the NPPF's overall imperative to make effective use of land, it is considered that the site should be allocated for an increased number of units to that suggested in the current allocation.

The site is large enough to provide area of open space and areas of landscaping to the more sensitive site boundaries that would result in ecological betterments and would ensure that the development on the site would have a limited impact on the open countryside, landscape and heritage assets.



*Figure 2. Adopted Policies Map showing location of Policy TAS 1*

#### GMLP Assessment

Despite being an existing allocation, the site has not yet been separately promoted to the emerging Local Plan, but it should be clear from the above that there is a clear argument for increasing the number of dwellings on the site to ensure the efficient use of land and avoid to unnecessary release of additional greenfield sites in the village. We therefore request that the site is reallocated in the emerging GMLP for up to 35 dwellings and enclose the requisite call for site form at **Appendix 1**.

**Appendix 1. Call for Sites Form**  
**Land north of Church Road and west of Tasburgh school, Tasburgh**

## Greater Norwich Site Submission Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

This form is to be filled out by any interested parties who want to promote a site for a specific use or development to be allocated in the Greater Norwich Local Plan.

Only one form should be submitted for each individual site i.e. it is not necessary for a separate form to be completed for each landowner on a single site in multiple ownerships. However, a separate form must be completed for each individual site submitted.

Your completed form should be returned to the Greater Norwich Local Plan team:

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Or, if it is not possible submit the form electronically,

By Post to:

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

The site submissions received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual site(s) being stored by Norfolk County Council and shared with Broadland District Council, Norwich City Council and South Norfolk District Council, and that the details of the site will be published for consultation purposes. Under the (GDPR) General Data Protection Regulation Norfolk County Council will be the data controller.

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.gnlp.org.uk](http://www.gnlp.org.uk)  
E-mail: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)  
Telephone: 01603 306603

<b>1a. Contact Details</b>	
Title	Mr
First Name	Geoff
Last Name	Armstrong
Job Title (where relevant)	Director
Organisation (where relevant)	Armstrong Rigg Planning
Address	
Post Code	
Telephone Number	
Email Address	

<b>1b. I am...</b>	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

<b>1c. Client/Landowner Details</b> (if different from question 1a)

Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Orbit Homes
Address	C/o Agent
Post Code	
Telephone Number	
Email Address	

<b>2. Site Details</b>	
<p>Site location / address and post code</p> <p>(please include as an attachment to this response form a location plan of the site on a scaled OS base with the boundaries of the site clearly shown)</p>	<p>Land north of Church Road and west of Tasburgh School, Tasburgh</p>
Grid reference (if known)	<p>Easting: 620317</p> <p>Northing: 295933</p>
Site area (hectares)	1ha

<b>Site Ownership</b>		
<b>3a. I (or my client)...</b>		
Is the sole owner of the site	Is a part owner of the site	Do/Does not own (or hold any legal interest in) the site whatsoever
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>3b. Please provide the name, address and contact details of the site's landowner(s) and attach copies of all relevant title plans and deeds (if available).</b>		
N/A		
<b>3c. If the site is in multiple landownerships do all landowners support your proposal for the site?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>3d. If you answered no to the above question please provide details of why not all of the sites owners support your proposals for the site.</b>		

<b>Current and Historic Land Uses</b>		
<b>4a. Current Land Use</b> (Please describe the site's current land use e.g. agriculture, employment, unused/vacant etc.)		
Agriculture		
<b>4b. Has the site been previously developed?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>



**4c. Describe any previous uses of the site.** (please provide details of any relevant historic planning applications, including application numbers if known)

N/A

**Proposed Future Uses**

**5a. Please provide a short description of the development or land use you proposed, including stating if it is for a settlement boundary revision** (if you are proposing a site to be designated as local green space please go directly to question 6).

Residential development of up to 35 dwellings (Please see covering letter and relevant enclosure for more details)

**5b. Which of the following use or uses are you proposing?**

Market Housing <input checked="" type="checkbox"/>	Business and offices <input type="checkbox"/>	Recreation & Leisure <input type="checkbox"/>
Affordable Housing <input checked="" type="checkbox"/>	General industrial <input type="checkbox"/>	Community Use <input type="checkbox"/>
Residential Care Home <input type="checkbox"/>	Storage and distribution <input type="checkbox"/>	Public Open Space <input checked="" type="checkbox"/>
Gypsy and Traveller Pitches <input type="checkbox"/>	Tourism <input type="checkbox"/>	Other (Please Specify) <input type="checkbox"/>

**5c. Please provide further details of your proposal, including details on number of houses and proposed floorspace of commercial buildings etc.**

Residential development of up to 35 dwellings (Please see covering letter and relevant enclosure for more details)

**5d. Please describe any benefits to the Local Area that the development of the site could provide.**

Increased delivery of market and affordable housing by reallocating existing residential site for an increased level of development that would make the most efficient use of the land available in accordance with the NPPF.

**Local Green Space**

If you are proposed a site to be designated as Local Green Space please complete the following questions. These questions do not need to be completed if you are not proposing a site as Local Green Space. Please consult the guidance notes for an explanation of Local Green Space Designations.

**6a. Which community would the site serve and how would the designation of the site benefit that community.**

N/A

**6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.**

N/A

**Site Features and Constraints**

Are there any features of the site or limitations that may constrain development on this site (please give details)?

**7a. Site Access:** Is there a current means of access to the site from the public highway, does this access need to be improved before development can take place and are there any public rights of way that cross or adjoin the site?

Existing agricultural access has the potential to be improved.

**7b. Topography:** Are there any slopes or significant changes of in levels that could affect the development of the site?

No

**7c. Ground Conditions:** Are ground conditions on the site stable? Are there potential ground contamination issues?

No

**7d. Flood Risk:** Is the site liable to river, ground water or surface water flooding and if so what is the nature, source and frequency of the flooding?

No

**7e. Legal Issues:** Is there land in third party ownership, or access rights, which must be acquired to develop the site, do any restrictive covenants exist, are there any existing tenancies?

N/A

**7f. Environmental Issues:** Is the site located next to a watercourse or mature woodland, are there any significant trees or hedgerows crossing or bordering the site are there any known features of ecological or geological importance on or adjacent to the site?

No

**7g. Heritage Issues:** Are there any listed buildings, Conservation Areas, Historic Parklands or Schedules Monuments on the site or nearby? If so, how might the site's development affect them?

Yes. See covering letter and relevant enclosure for more details.

**7h. Neighbouring Uses:** What are the neighbouring uses and will either the proposed use or neighbouring uses have any implications?

Residential, education and agricultural. No implications.

**7i. Existing uses and Buildings:** are there any existing buildings or uses that need to be relocated before the site can be developed.

No

**7j. Other:** (please specify):

**Utilities**

**8a. Which of the following are likely to be readily available to service the site and enable its development? Please provide details where possible.**

	Yes	No	Unsure
Mains water supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mains sewerage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Electricity supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gas supply	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public highway	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Broadband internet	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (please specify):			
<b>8b. Please provide any further information on the utilities available on the site:</b>			

<b>Availability</b>	
<b>9a. Please indicate when the site could be made available for the land use or development proposed.</b>	
Immediately	<input checked="" type="checkbox"/>
1 to 5 years (by April 2021)	<input type="checkbox"/>
5 - 10 years (between April 2021 and 2026)	<input type="checkbox"/>
10 – 15 years (between April 2026 and 2031)	<input type="checkbox"/>
15 - 20 years (between April 2031 and 2038)	<input type="checkbox"/>
<b>9b. Please give reasons for the answer given above.</b>	
The site is currently marketed for sale.	

<b>Market Interest</b>
<b>10. Please choose the most appropriate category below to indicate what level of market interest there is/has been in the site. Please include relevant dates in the comments section.</b>

	Yes	Comments
Site is owned by a developer/promoter	<input type="checkbox"/>	
Site is under option to a developer/promoter	<input type="checkbox"/>	
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input checked="" type="checkbox"/>	Increase in numbers above current allocation is needed to ensure viability
None	<input type="checkbox"/>	
Not known	<input type="checkbox"/>	

<b>Delivery</b>	
<b>11a. Please indicate when you anticipate the proposed development could be begun.</b>	
Up to 5 years (by April 2021)	<input checked="" type="checkbox"/>
5 - 10 years (between April 2021 and 2026)	<input type="checkbox"/>
10 – 15 years (between April 2026 and 2031)	<input type="checkbox"/>
15 - 20 years (between April 2031 and 2038)	<input type="checkbox"/>
<b>11b. Once started, how many years do you think it would take to complete the proposed development (if known)?</b>	
It is a current allocation and the proposed increase in numbers on the site would ensure its viable delivery.	

<b>Viability</b>			
<b>12a. You acknowledge that there are likely to be policy requirements and Community Infrastructure Levy (CIL) costs to be met which will be in addition to the other development costs of the site (depending on the type and scale of land use proposed). These requirements are likely to include but are not limited to: Affordable Housing; Sports Pitches &amp; Children's Play Space and Community Infrastructure Levy</b>	<input checked="" type="checkbox"/>		
	Yes	No	Unsure
<b>12b. Do you know if there are there any abnormal costs that could affect the viability of the site e.g. infrastructure, demolition or ground conditions?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**12c. If there are abnormal costs associated with the site please provide details:**

**12d. Do you consider that the site is currently viable for its proposed use taking into account any and all current planning policy and CIL considerations and other abnormal development costs associated with the site?**



**12e. Please attach any viability assessment or development appraisal you have undertaken for the site, or any other evidence you consider helps demonstrate the viability of the site.**

Orbit Homes is an experience housebuilder with a proven track record of delivery in the local area and has assessed the viability of the site for up to 35 dwellings.

**Other Relevant Information**

**13. Please use the space below to for additional information or further explanations on any of the topics covered in this form**

<b>Check List</b>	
Your Details	X
Site Details (including site location plan)	X
Site Ownership	X
Current and Historic Land Uses	X
Proposed Future Uses	X
Local Green Space (Only to be completed for proposed Local Green Space Designations)	
Site Features and Constraints	X
Utilities	X
Availability	X
Market Interest	X
Delivery	X
Viability	X
Other Relevant Information	
Declaration	X

#### 14. Disclaimer

I understand that:

Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018 / Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk District Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form
- to evaluate the development potential of the submitted site for the uses proposed within the form

The Site Submission response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual sites being stored by Norfolk County Council, and the details being published for consultation purposes. Any information you consider to be confidential is clearly marked in the submitted response form and you have confirmed with the Council(s) in advance that such information can be kept confidential as instructed in the Greater Norwich Local Plan: Regulation 18 “- Site Submission Guidance Notes.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information

#### Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name  
Geoff Armstrong

Date  
10.03.2020

**Appendix 2. Draft Layout**  
**Land east of Norwich Road, north of Ransome Avenue, Scole**





Norwich Road, Scole

Draft Urban Design Response 1:500 @ A2