

Ref: GA/DJ/03320/L0003

22 March 2021

Greater Norwich Local Plan Team  
County Hall  
Martineau Lane  
Norwich  
NR1 2DH

Sent by email to: [gntp@norfolk.gov.uk](mailto:gntp@norfolk.gov.uk)

Dear Sir / Madam

**Greater Norwich Local Plan – Regulation 19 Publication  
Representations on behalf of Orbit Homes**

On behalf of our client, Orbit Homes, we are pleased to submit representations to the Regulation 19 Publication of the Greater Norwich Local Plan (GNLP). This letter contains a summary of our client's representations, the detail of which is contained on the enclosed documents (including required forms) for each policy commented on:

- Enclosure 1. Policy 1 – Growth Strategy**
- Enclosure 2. Policy 2 – Sustainable Communities**
- Enclosure 3. Policy 3 – Environmental Protection and Enhancement**
- Enclosure 4. Policy 4 – Strategic Infrastructure**
- Enclosure 5. Policy 5 – Homes**
- Enclosure 6. Policy 7.2 – The Main Towns**
- Enclosure 7. Policy 7.4 – Village Clusters**
- Enclosure 8. Part 2 Sites Plan – Long Stratton**

Our client's representations focus on the soundness of the plan and raise several serious issues that we consider need to be resolved with modifications in order to for plan to be found sound. As currently drafted, our client considers that **the GNLP is unsound**.

I can also confirm that on behalf of our client we wish to participate in the hearing sessions for the policies commented on. Our client is a key partner to the Greater Norwich Councils in the delivery of both affordable and market housing and we consider that it is essential for their views to heard in the public hearings.

**Summary**

The following provides a brief summary of the detailed representations contained in Enclosures 1-8:

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The Exchange, Colworth Science Park, Sharnbrook, Bedford, MK44 1LQ.

- Policy 1 – Growth Strategy – Unsound:** It fails to account for City Deal and Cambridge to Norwich Tech Corridor growth strategies in setting the minimum housing requirement possible. This failure renders the policy contrary to national policy and therefore unsound. The housing requirement needs urgently reviewing to accurately assess the impact of the scale of economic growth planned on housing needs in the area and in order to meet the City Deal commitments by 2026 there is a need to allocate many more short term deliverable housing sites. The policy is also unsound with respect to the proposed distribution of growth. Far too many homes are allocated to the unsustainable village clusters which is an unjustified approach in the context of the GNLP's climate change statement. There is also no security in the delivery of homes in the South Norfolk Village Clusters which renders the policy ineffective. To make the policy sound, it is necessary to allocate a higher proportion of growth to the sustainable Main Towns.
- Policy 2 – Sustainable Communities – Unsound:** This policy is unsound in two respects. Firstly, the requirement to respect, protect and enhance local character is not in accordance with national policy which only requires this of 'valued landscape' (NPPF paragraph 170). The requirement should be amended to be in accordance with this and NPPF paragraph 127 in recognising and being sympathetic to local character, but only requiring the valued landscapes to be protected and enhanced. Secondly, there is no justification for setting potentially more demanding water efficiency standards if they are introduced by the government. Such requirements would either be introduced as mandatory through building regulations (and therefore require no such policy in the GNLP) or they will be introduced as optional standards, in which case it will be necessary to conduct a partial review of the GNLP to assess the impact of their introduction on delivery and viability.
- Policy 3 – Environmental Protection and Enhancement – Unsound:** Orbit Homes are supportive in principle of the introduction of 10% biodiversity net gain, but if developers are required to individually deliver off-site biodiversity improvements (when not possible on-site) through acquiring additional land or working with third parties on a site by site basis, there is a very real risk that the timely delivery of new homes will be severely impacted. Orbit Homes therefore considers that in order for this policy to be effective and sound, the GNLP must include a mechanism for developers to pay into a central pot that will be used to deliver biodiversity improvements on a wider scale.
- Policy 4 – Strategic Infrastructure – Unsound:** The statement that transport infrastructure will be brought forward to support the aims of the plan, including the A140 Long Stratton bypass, is welcome. However, to avoid ongoing failures in the delivery of housing in Long Stratton due to the potential failure to secure funding for the bypass, it is critical that additional short term deliverable sites are allocated now and that the GNLP commits to a review of allocations in Long Stratton if the current funding bid to central government is unsuccessful.
- Policy 5 – Homes – Unsound:** This policy is unsound in three respects. Firstly, the requirement for 10% of affordable homes to be affordable home ownership does not accord with NPPF paragraph 64 which requires 10% of all homes. Secondly, the requirement for Nationally Described Space Standards is well intentioned, but will impact upon the effectiveness of the plan in delivering affordable housing as Homes England grants only fund maximum dwelling sizes at c.85% of NDSS. Flexibility needs adding to the policy to allow smaller dwellings where the grants available for affordable housing delivery would fail to fully fund the costs of delivering larger dwellings. Thirdly, the requirement for 5% of plots on sites of 40+ dwellings would greatly overprovide against the evidenced need for Self/Custom-Build Housing and needs reviewing urgently to ensure it is justified.
- Policy 7.2 – The Main Towns – Unsound:** As set out in our representations to Policy 1, there is a need to allocate additional short term deliverable sites to meet City Deal growth commitments by 2026 and the GNLP currently proposes an unjustified and ineffective distribution of development that relies too heavily on small villages. To resolve these issues, we consider additional sites should be allocated in the Main Towns and in particular Long Stratton where there is pent up demand due to the failure of Policy LINGS1 to deliver any homes due to the stalled bypass proposals.

- **Policy 7.4 – Village Clusters – Unsound:** The strategy to produce a separate South Norfolk Village Clusters plan is unsound as it significantly undermines strategic approach to delivery in these settlements and is not based on an assessment of the ability of these villages to sustainably accommodate the significant proportion of growth proposed. Housing delivery in these villages should be allocated in the GNLP based on a thorough assessment of need and capacity, which we consider will significantly reduce the total number of homes deemed appropriate in these locations. As set out in our representations to Policy 7.2, the housing requirement for the South Norfolk Village Clusters should be reduced to a less strategically significant number and new allocations made in the sustainable Main Towns.
- **Part 2 – Sites Plan – Main Towns Chapter – Long Stratton – Unsound:** As set out in our representations to Policies 1, 4 and 7.2, there is a need for new allocations in Long Stratton to make up for the failure of the 1,800 home allocation to deliver a single dwelling (despite forecasts that it would have delivered 650 dwellings by the end of 2020/21) and also to address the unsustainable over-allocation to small villages and to meet the City Deal growth commitment by 2026. In this context, the need to positively address the unmet needs of Long Stratton is critical to ensuring the GNLP is justified, effective and therefore sound. Orbit Homes’ site at Land south of St Mary’s Road, Long Stratton (ref. GNLP0509) is the most sustainable and deliverable option available to meet these needs. In fact, it is the only option that has been consistently assessed as suitable by the Council and it is therefore essential that it is allocated to meet current local needs.

We trust these representations will be taken into account in progressing the GNLP and we look forward to participating further during the course of the examination. If you have any questions in the meantime, please do not hesitate to contact me, or my colleague David Jones, on [david.jones@arplanning.co.uk](mailto:david.jones@arplanning.co.uk).

Yours sincerely

Geoff Armstrong ([geoff.armstrong@arplanning.co.uk](mailto:geoff.armstrong@arplanning.co.uk))  
**Director, Armstrong Rigg Planning**  
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**Encs.**

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