

## **Greater Norwich Local Plan Pre-Submission Draft Strategy – Regulation 19 Publication Strategy Representations on behalf of Orbit Homes**

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### **Part 2 – Sites Plan – Main Towns Chapter – Long Stratton**

The Main Towns Chapter of the Part 2 Sites Plan sets out a very brief background Long Stratton and confirms (as set out in the Part 1 Strategy) that no new allocations are proposed in the town due to the existing allocation of 1,800 homes by the Long Stratton Area Action Plan.

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. The delayed delivery of the 1,800 home allocation in Long Stratton is due to the failure of the Council to ensure that the allocated development could viably deliver the required bypass to the town. This failure has resulted in a need to seek central government funding for the bypass that has still not been confirmed. In this context, the need to positively address the unmet needs of Long Stratton is critical and Orbit Homes' site at Land south of St Mary's Road, Long Stratton (ref. GNLP0509) (henceforth 'the site') 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 as soon as possible.

### **GNLP0509 – Land south of St Mary's Road, Long Stratton**

#### **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.
- **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 despite 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>1</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.

## 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 Reasonable Alternative Sites</b>	Summarises the HELAA conclusion that the site is suitable in all respects and presents the views of key consultees: <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>
<b>7. Settlement Based Appraisal of Reasonable Alternative Sites and Identification of Preferred Site/s (Where Appropriate)</b>	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.  It then goes on to states all seven promoted sites <i>"have been dismissed on highway and landscape</i>

<sup>1</sup> Appeal Ref: APP/L2630/W/18/3215019 | Land off St Mary's Road, Long Stratton | 23 August 2019

Stage	Summary of Assessment
	<p><i>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. GNLP0509) 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 Policies 1, 4 and 7.2, there is a particularly acute need in Long Stratton for additional deliverable sites to come forward in the short term and for the strategy to be reviewed if the funding bid to national government for the bypass is not successful. 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.

Orbit Homes objects to the classification of the site as an 'unreasonable site' as this conclusion is not justified by the Council's own evidence and clearly fails to reflect the sustainability of the site to deliver much needed new homes in the town.

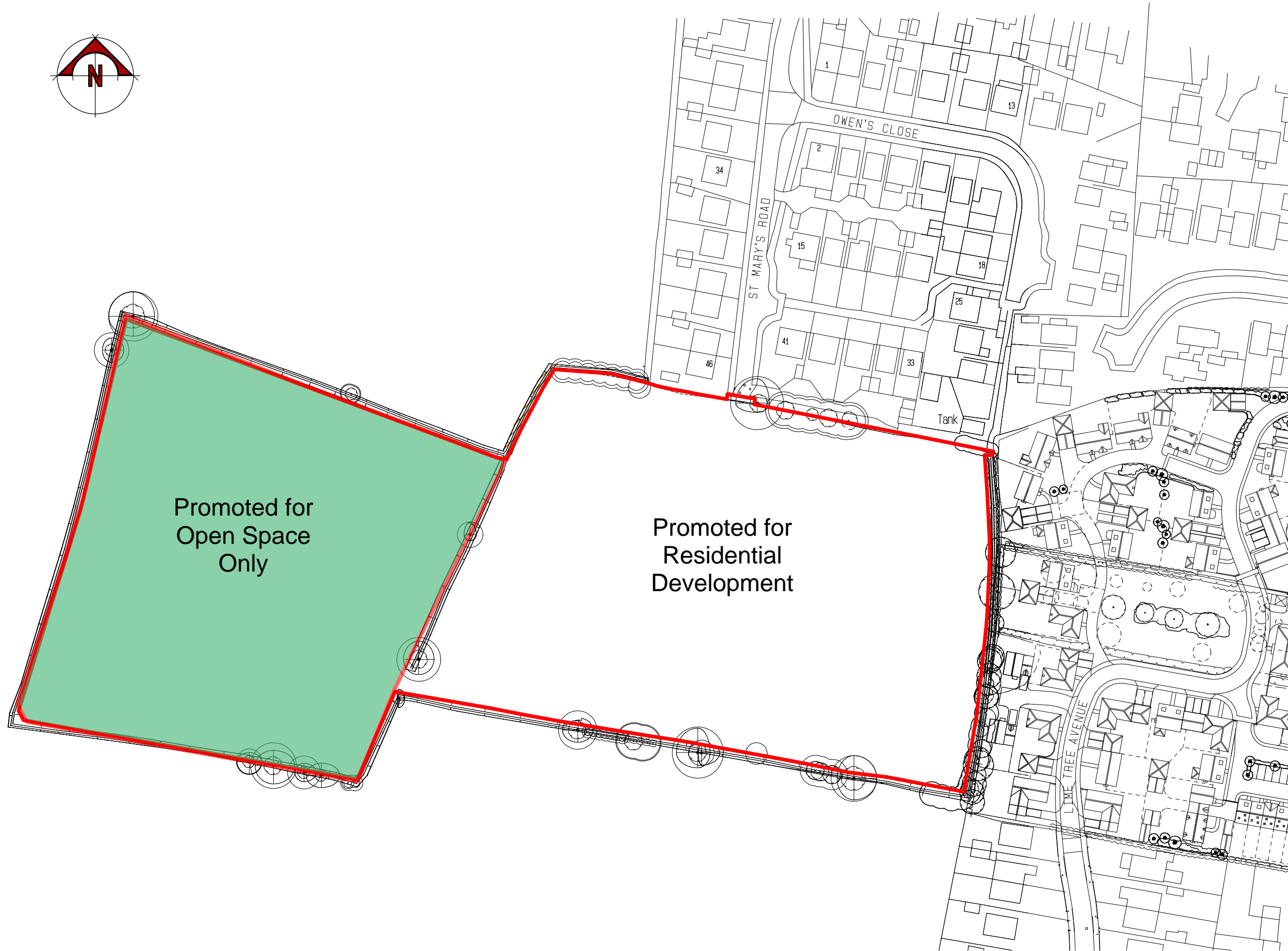
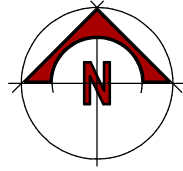
### **Promoted Development**

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.

**Recommendation:** 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.



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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

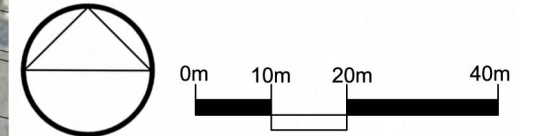
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JOB NO.	DWG NO.	REV.
6910	LOC01	-

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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



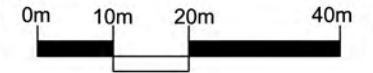
Native Trees



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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

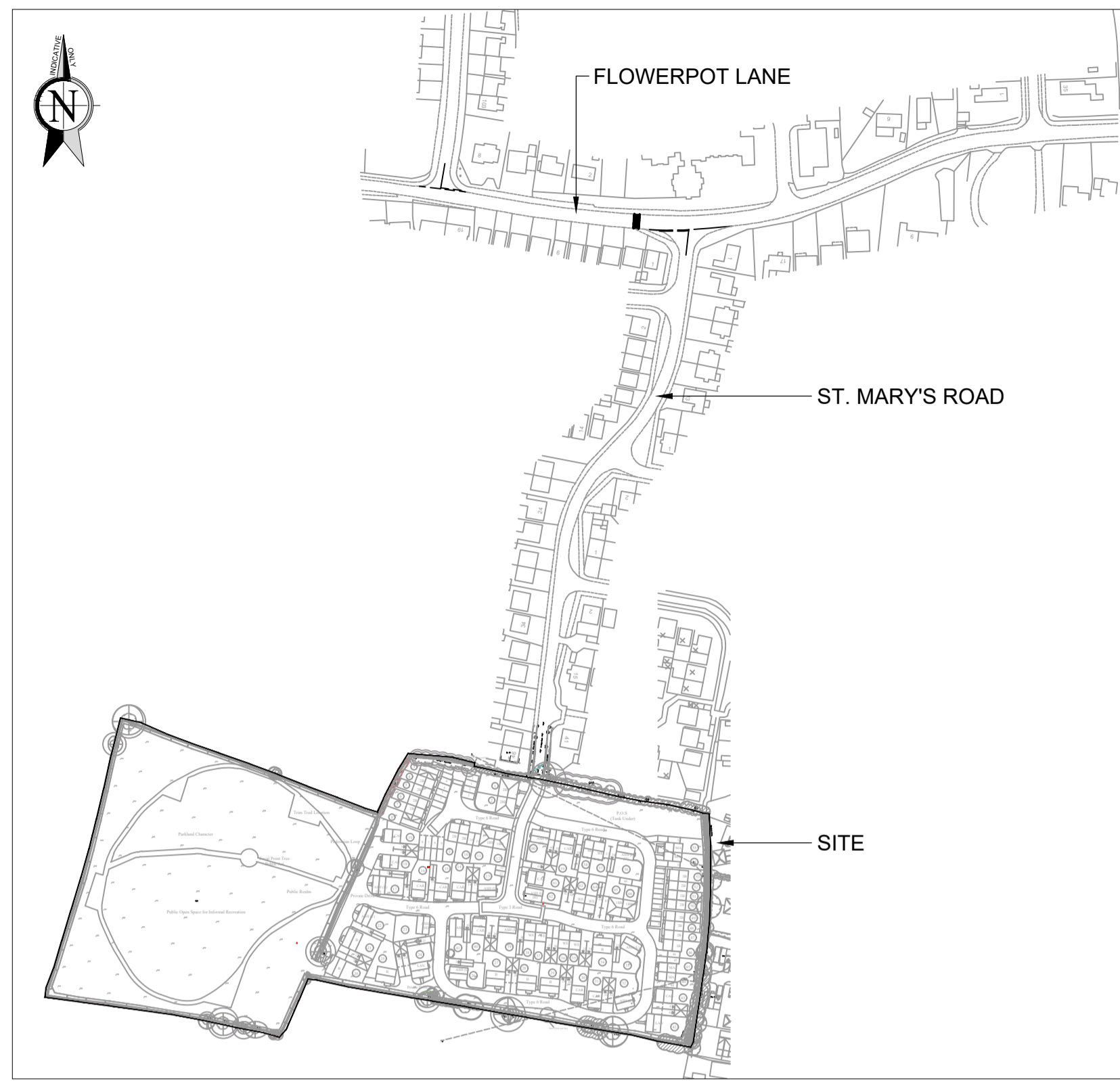
**aspect** landscape planning

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.

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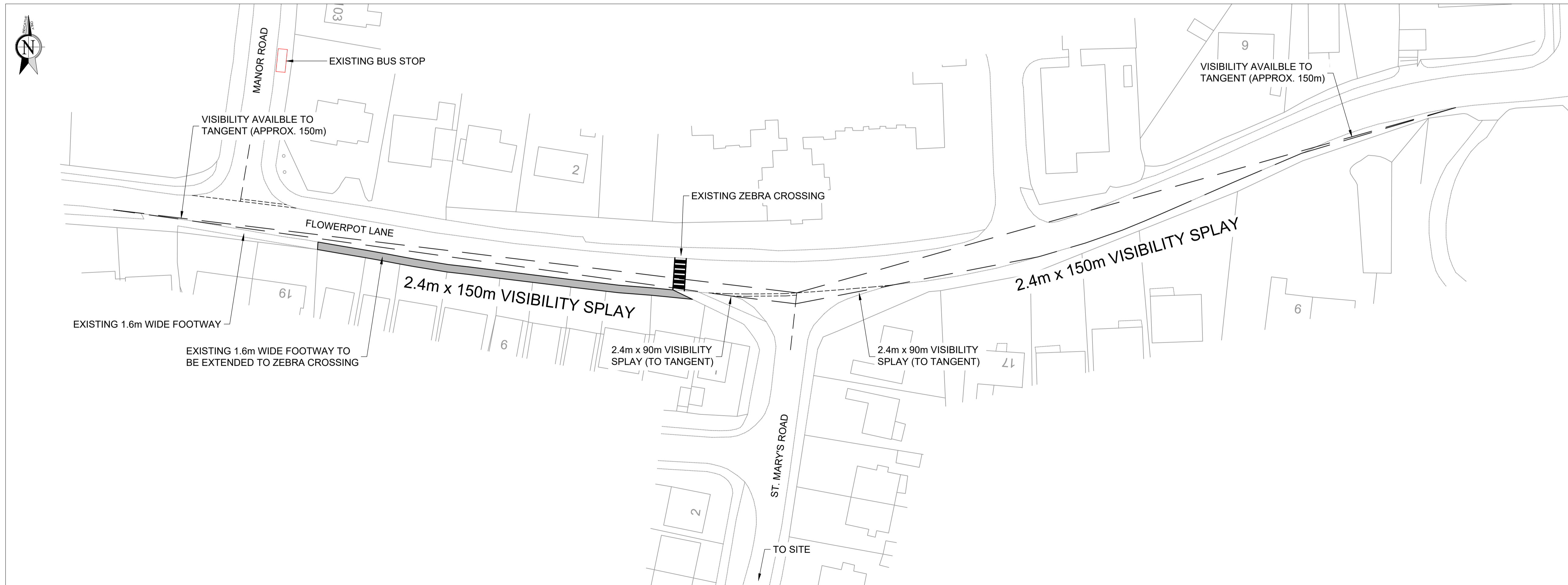
**MAINTENANCE/CLEANING RISKS:**  
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**DEMOLITION RISKS:**  
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**VISIBILITY PLAN**  
SCALE 1:500

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REV	DESCRIPTION	DATE	BY	AUTH
	PRELIMINARY ISSUE.	19.09.17	GM	NH



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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**