

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

Policy 7.4 – Village Clusters

Policy 7.4 sets the 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.

South Norfolk Village Clusters

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.

Recommendation: Orbit Homes considers that in order to accord with the NPPF, allocations in the village clusters must either be brought back into the GNLP and based on a thorough assessment of need and capacity. Or alternatively, 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.