

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

Policy 7.2 – The Main Towns

Policy 7.2 sets the approach to development in the main towns of Aylsham, Diss, Harleston, Long Stratton and Wymondham. Our representations on behalf of Orbit Homes are relevant to all the Main Towns but focus on the strategy for Long Stratton.

Strategy for Main Towns

As set out in Orbit Homes' representations to Policy 1, compared to existing commitments, the strategy for new allocations focusses a significantly higher proportion of growth to the village clusters (increased from 7% of existing commitments to 16% of new allocations), broadly similar levels of growth to the main towns (increased from 14%-15.5%) 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% to 62%).

Orbit Homes objects to this change of focus as it is clearly contrary to professed aims of the GNLP's Climate Change Statement to deliver growth in sustainable locations that reduce the need to travel. The allocation of an additional 1,682 dwellings in small villages is clearly contrary to the principles of sustainable development. There has also been no assessment of the ability of village clusters in South Norfolk to sustainably accommodate the high level of growth proposed. The strategy can therefore neither be considered justified (as it is not an appropriate strategy) nor effective (as there is no surety that the South Norfolk village clusters can sustainably accommodate the proposed growth) and it fails the tests of soundness set by NPPF paragraph 35.

The Main Towns continue to be allocated a comparatively low level of growth in the spatial distribution. 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% 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 identify a need to allocate additional sites that are deliverable within the next 6 years in order to meet the City Deal growth commitments.

Recommendation: In order to reflect the sustainability of the main towns and rectify the unsustainable growth distribution put forward in small villages, we consider that a proportion of this growth should be redistributed to the Main Towns. Further, the additional deliverable sites needed to meet City Deal growth requirements should be sought in the Main Towns. We therefore consider that these additional allocations should be sought in the Main Towns.

Strategy for 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 supporting text to the policy explains the reasoning for this decision at paragraph 365:

"Owing to the scale of the existing commitment in Long Stratton, which will both provide a by-pass (see paragraph 320)¹ 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, as set out in our representations to Policy 4, is that the 1,800 home allocation should have delivered 1,800 dwellings by 2026 and is now only forecast to deliver 300 dwellings in this period. 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 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 (until a decision on funding for the bypass is reached – see representations to Policy 4) 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 150 dwellings. Long Stratton by comparison is prevented from being allocated further much needed growth due to the failure of the existing allocation.

Recommendation: In the above 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 in the short term to help meet pent up demand due to a lack of delivery in recent years. Additional deliverable allocations in the town would also help deliver on the City Deal growth commitments to 2026.

The need to identify an additional deliverable housing site is 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 is therefore essential that it is allocated to meet current local needs as soon as possible.

In addition to allocating additional sites in Long Stratton, we would repeat our recommendation set out in Orbit Homes' reps to Policy 4, that to avoid repeated failures to deliver new housing in Long Stratton, the GNLP should be amended to include a trigger for a review of allocations in Long Stratton if the funding bid for the bypass is unsuccessful.

¹ This reference is incorrect as GNLP paragraph 320 refers to Anglia Square and not the Long Stratton Bypass