

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

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**Policy 2 – Sustainable Communities**

Policy 2 includes design and technical requirements relating to the promotion of high quality developments and sustainable communities. Our representations on behalf of Orbit Homes focus on the policy requirements set for landscape and local character and water efficiency.

**Landscape and Local Character**

The policy states at criteria 5 that development proposals are required, as appropriate, to:

*"5. Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment), ..."*

There is no requirement in the NPPF for proposals to protect and enhance landscape or local character. This requirement only applies to 'valued landscapes' (para 170). For other areas there is a requirement to recognise the intrinsic character and beauty of the countryside (para 170) and be sympathetic to local character (para 127). The policy therefore fails to accord with national policy and is unsound.

**Recommendation:** The policy should be amended as follows:

*"5. Recognise the intrinsic character and beauty of the character, be sympathetic to local character and protect and enhance valued landscapes, ..."*

**Water Efficiency**

The policy states at criteria 9 with respect to water efficiency that:

*"If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich."*

There is no justification for applying an unknown potential future government requirement in this way. If such a future requirement were introduced as an optional standard by the government then it would clearly be inappropriate for the Councils to automatically apply it without assessing the impacts of doing so on other factors such as viability. Such a requirement would therefore need to be introduced through a partial Local Plan review. While if such a requirement were introduced through building regulations, then it would be mandatory and as such this policy criteria would be redundant. It is inappropriate for the Council to seek to apply an unknown standard in this way and doing so is not consistent with national policy at NPPF paragraph 16 which requires policies to be clearly written and unambiguous. This policy criteria is therefore unsound.

**Recommendation:** Delete the above quoted phrase from criteria 9.