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2<sup>nd</sup> August 2021

***Submitted via the online consultation portal***

Place Shaping Team  
Planning  
South Norfolk Council  
Cygnet Court  
Long Stratton  
NR15 2XE

Dear Sirs

**Representations to South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft)  
Site: SN4079, Land north of Church Road and west of Tasburgh School  
On behalf of Orbit Homes**

On behalf of our client, Orbit Homes, we are pleased to make representations to the South Norfolk Village Clusters Housing Allocations Plan (Reg. 18 Draft) (VCHAP) consultation. These representations support the re-allocation of Land north of Church Road and west of Tasburgh School for up to 30 dwellings and also provide comment on the Objectives and Core Policies set out in the VCHAP.

**About Orbit Homes**

Orbit's vision is simple - they lead in building thriving communities. They believe everyone is entitled to a good quality home that they can afford in a place that they are proud to live. Orbit was established in 1967 to tackle homelessness and five decades on, they are one of the largest builders of affordable homes in the country. Their aim is to ensure the homes they provide and the places they create are good quality, affordable and safe. They are a commercial organisation with a strong social purpose and they reinvest their profits from market homes delivered to improve the quality of their homes and services.

**The Plan Objectives**

**Question 1: Do you agree with the Objectives for the Village Clusters Plan? If you think the Objectives should be changed, please explain how and why.**

Orbit Homes are generally supportive of the objectives of the VCHAP, but have several comments to ensure that they are effective and accord with national policy:

- **SNVC Objective 1 - Meet housing needs:**

Orbit Homes supports the objective to deliver housing in accordance with the Greater Norwich Local Plan (GNLP) housing target for the South Norfolk Village Clusters through the allocation of viable and deliverable development sites for housing. To ensure the delivery of the GNLP's requirement of 1,200 dwellings in South Norfolk's village clusters, we would recommend an over allocation of c.20% above this number. This will allow for any sites that fail to come forward as expected during the plan period.

Orbit Homes also supports the objective to ensure that housing sites provide an appropriate mix of house types, sizes and tenures, but objects to the inclusion of a specific policy on housing mix as set out below.

- **SNVC Objective 2 - Protecting village communities and support rural services and facilities:**

Orbit Homes supports the objective to provide opportunities for new housing development in a range of settlements within the village clusters to support local services and facilities, meeting the needs of a range of occupiers with the potential to support different local services and facilities.

- **SNVC Objective 3 – Protect the character of villages and their settings:**

Orbit Homes supports the objective to ensure that the scale, location and density of housing is well related to the form and character of existing villages, but considers that it should be amended to ensure it accords with NPPF paragraph 124 on achieving appropriate densities. Paragraph 124 requires planning policies to support development that makes efficient use of land, whilst taking into account the desirability of maintaining an area's prevailing character. At present, Objective 3 fails to recognise the NPPF's focus on making efficient use of land. The objective therefore needs amending to ensure it sets a balanced approach to achieving efficient densities that also relate well to local character.

## **Core Policies**

**Question 2: Do you agree that the Village Clusters Plan should include a policy on 'Standard requirements'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

Orbit Homes supports the principle of including a policy on standard requirements where it would avoid every allocation having the same standard requirements repeated, but care needs to be taken to ensure that these requirements don't simply repeat and don't contradict policies contained in the GNLP and Development Management Policies which will not be replaced by the VCHAP.

In this context, we have the following comments on the suggested **Policy SNVC1 - Standard requirements** below:

- **minimising the impact on the amenity of existing residents** – This requirement simply repeats existing requirements set out in more detail at Policy DM 3.13 Amenity, noise and quality of life and should be deleted.
- **landscaping consistent with a rural, edge of village location, taking into account the South Norfolk Landscape Character Assessments** – This requirement repeats Policy DM 4.5 Landscape Character and River Valleys.

- **provision of open space on sites of 15+ dwellings;** This requirement repeats Policy DM3.15: Outdoor play facilities and recreational open space and the Guidelines for Recreation Provision in New Residential Developments SPD.

**Question 3: Do you agree that the Village Clusters Plan should include a policy on 'Design'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

The new NPPF published in July 2021 includes key changes with respect to how design policies and guidance are provided at a local level. At paragraph 128 it requires all local planning authorities to prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. In this context, Orbit Homes object to the inclusion of a policy on design in the VCHAP as it would fail to provide the level of detailed guidance now required by the NPPF. Further, the criteria currently proposed only serve to repeat other more detailed policies in other existing plans and guidance document, such that the proposed **Policy SNVC2 – Design** is unnecessary.

**QUESTION 4: Do you agree that the Village Clusters Plan should include a policy on 'Housing Mix'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

Orbit Homes objects to the inclusion of **Policy SNVC3 – Housing Mix** as it would only serve to repeat existing policy requirements contained elsewhere. The consultation document states that a housing mix policy could include requirements for development to meet the affordable housing and housing mix requirements of the most up to date SHMA (or equivalent). A requirement for developments to meet the housing mix requirements of the current SHMA is already set out at Policy DM3.1 and the affordable housing requirement for the district is set out at emerging GNLP Policy 5.

## **Tasburgh**

**Question 132: Do you agree with the extent of the Settlement Limit and any changes proposed? If not, please explain what further changes should be made.**

Orbit Homes supports the proposed Settlement Limit shown on the Map Booklet for Tasburgh as it includes Land north of Church Road and west of Tasburgh School that is allocated for development by **Policy TAS1** of the Site Specific Allocations and Policies Document (2015). As set out below, Orbit Homes has an interest in this site and can confirm that it is deliverable for the level of development now proposed.

**Question 133: Do you support or object to the allocation of the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to. If the site is allocated do you think there are any specific requirements that should be set out in the allocation policy?**

Land north of Church Road and West of Tasburgh School (**Site: SN4079**) is already allocated for the development of 20 dwellings by **Policy TAS1** of the Site Specific Allocations and Policies Document (2015) and Orbit Homes supports its proposed re-allocation for up to 30 dwellings.

The NPPF sets out at paragraph 79 that:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."*

The re-allocation of the site would enhance and maintain the vitality of Tasburgh by providing a new on land adjoining the primary school and in close proximity to all other local services and facilities. Orbit Homes has an interest in the site and is committed to delivering a high quality development with a mixture of house types and sizes to meet local needs, including affordable housing.

The Council's assessment of the site confirms that it is suitable, available and achievable for development and therefore deliverable for development. The only points raised in this assessment that need further consideration are:

- **Highways:**

NCC Highways has advised that development would be required to provide access to both Church Rd & Henry Preston Rd with continuous link between, widening at Church Rd frontage to a minimum 5.5m and provision of 2.0m frontage footway at Church Road to link with existing facility to east. Orbit Homes can confirm that these highways provisions are considered to be deliverable through the development of the site.

- **Density:**

The Council's conclusions with respect to the number of dwellings proposed on the site states that:

*"The applicants are seeking to increase the density of the site than it is currently allocated for under TAS1. Whilst the site is still considered a reasonable option for delivery the original allocation required consideration of school expansion which would require land from this site. Confirmation would be needed from NCC Education that this is no longer the case if the density is to be increased."*

Orbit Homes disagree with the Council's assessment above that an increase in dwellings on the site is dependent on there being no requirement for school expansion for the following reasons:

- **Reason for existing under allocation:** The reason that the site is currently allocated for residential development at a level of development that does not reflect its true capacity is that the adopted Joint Core Strategy only allocated 10-20 dwellings to each Service Village. This led to numerous sites being allocated development at very low densities (i.e. 17.5 dwellings per hectare in the case of Tasburgh). There is a requirement at Policy TAS1 for school expansion to be considered, but no suggestion that this by itself would restrict development to just 20 dwellings.
- **Pupil forecasting and school capacity:** The Greater Norwich Infrastructure Needs Report (2020) states that for the purposes of pupil place planning, Norfolk County Council uses a multiplier of 28.1 primary age children per 100 new homes. A development of 30 dwellings would therefore create a need for an additional 9 primary school places. It is understood that Preston Primary School which adjoins the site serves a small catchment area of just Tasburgh and that the site is the only proposed allocation within this catchment area (i.e. the Tasburgh village cluster). It is also understood from Norfolk County Council's website that the school is currently operating within

capacity. The NPPF is clear that planning obligations must only be sought where they are necessary, directly related to the development and fairly and reasonably related in scale and kind. In this context, we would expect any requirement for school expansion as a result of the proposed development to be small.

- **Appropriate density of development:** NPPF Paragraph 124 requires planning policies to support development that makes efficient use of land, whilst taking into account the desirability of maintaining an area's prevailing character. In this respect it is critical that the site allocation makes efficient use of the precious resource that is housing land whilst reflecting the character of the surrounding area. To assess the density of development in the surrounding area we have measured a 1.14ha area (i.e. the same size as the site) within the existing residential development to the east of the site on the plan below. This area comprises almost entirely detached family homes and yet still manages to achieve 33 dwellings or a density of 29 dwellings per hectare (dph). Given that the site will be required to provide a much greater variety of dwelling types and sizes (including smaller terraced and semi-detached dwellings) we consider a density of c.35 dph would be achievable on the site with similar levels of building coverage to that in the surrounding area. This would enable a development design that reflects the local character whilst ensuring an efficient use of land.



- **Capacity of the Site:** The site is 1.14ha in size which at 35 dwellings per hectare (dph) could accommodate 40 dwellings. It is therefore clear that 30 dwellings could be delivered on the site, whilst retaining sufficient land for any small school expansions that are required to serve the proposed development.

**QUESTION 134: Do you think that any of the rejected sites should be allocated instead of, or in addition to, the preferred site? Please add additional comments to explain your response and please specify which site(s) you are referring to.**

Orbit Homes has reviewed the three other sites submitted for residential development in Tasburgh and it is clear that none of them are suitable for residential development due to their distance from the settlement, access and highways issues and their impact on the historic environment and local townscape and landscape. We therefore agree with the Council's assessment of these sites.

## **Summary and Conclusion**

Orbit Homes supports the re-allocation of Land north of Church Road and west of Tasburgh School for up to 30 dwellings. The site is suitable, available and achievable for the proposed level of development and must therefore be considered deliverable. We consider the requirements for the site set out by the Local Highways Authority to be deliverable and we have demonstrated that the site could be delivered for 30 dwellings at an appropriate density whilst retaining land for potential small scale school expansion should this be required. In conclusion, there are no reasons to prevent the site from being developed for 30 dwellings and it should be re-allocated accordingly.

We trust that these comments will be given due consideration and look forward to participating further as the South Norfolk Village Clusters document progresses further. If you require any further information then please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Armstrong', written in a cursive style.

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