



HEARING STATEMENT

Examination of the Greater Norwich Local Plan

On behalf of:
Orbit Homes

In respect of:
Matter 3 – Strategy for the Areas of Growth
Issue 2 – The Main Towns

Date:
January 2022

Document Reference:
GA/DJ/00320/S0002

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Orbit Homes in respect of **Issue 2 – The Main Towns of Matter 3 – Strategy for the Areas of Growth** of the Inspector’s Matters, Issues and Questions (Part 1) for the Examination of the Greater Norwich Local Plan (the ‘GNLP’).
- 1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan and will form the basis of our points for discussion at the Examination Hearing session on 3rd February 2022.

2.0 Questions

Question 1

Policy 7.4 (relating to Village Clusters) includes an exception sites policy for affordable housing led development, but Policy 7.2 (relating to Main Towns) does not. What is the reason for this approach and is it justified?

- 2.1 There is no justification for this approach. National policy includes no such restriction on where exception sites can be delivered. Rural exception sites are defined in the NPPF glossary and at paragraph 78 as small sites (albeit there is no definition of small and this will clearly depend upon context) that must meet identified local needs and be used for affordable housing in perpetuity. There is no restriction on the type of settlement that they can come forward in. The only restriction placed on the location of affordable housing exception sites in national policy is that for Entry-level exception sites at NPPF paragraph 72 (i.e. not in a National Park, Area of Outstanding Natural Beauty or Green Belt) and First Homes at PPG ID: 70-025 (i.e. not in the Green Belt, within the Broads Authority, or in designated rural areas as defined in Annex 2 of the NPPF).
- 2.2 There is also no justification for the 15 dwelling limit as there will be settlements where the need for affordable housing is higher than this.
- 2.3 **Recommendation:** The policy for affordable housing exception site should form its own separate policy in the GNLP so that there is no restriction placed on which tier of the hierarchy a settlement is in. There should be no restriction on the number of dwellings, subject to there being an identified need.

Question 2.

Is Policy 7.2 otherwise justified, effective, and consistent with national policy?

- 2.4 No. The low level of new allocations in the Main Towns (just 15.5% of the total, compared with 16% in the village clusters) is contrary to the GNLP's climate change statement which aims to deliver growth in sustainable locations that reduce the need to travel and encourage sustainable modes of travel.
- 2.5 **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 and in particular to Long Stratton where there a lack of delivery in recent year due to the stalling of progress on the 1,800 home allocation. The Main Towns should also be a focus for identifying the additional deliverable housing sites needed to meet City Deal growth requirements (as set out in our representations to Policy 1).