

Ref: GA/DJ/05821/L0001

14th March 2023

Sent by email to NeighbourhoodPlanning@breckland.gov.uk

Planning Policy Team
Breckland District Council
Elizabeth House
Walpole Loke
Dereham
NR19 1EE

Dear Sir / Madam,

**Watton Neighbourhood Plan (Regulation 16) Consultation
On behalf of Orbit Homes**

We are pleased to provide representations to the Watton Neighbourhood Plan (WNP) (Regulation 16) consultation on behalf of our client, Orbit Homes.

Orbit have recently acquired an interest in land at Mallard Road, Watton which has outline planning permission (ref: 3PL/2015/0254/O) and is subject to a pending reserved matters application for 177 dwellings (ref: 3PL/2019/0991/D). Orbit have not previously made representations to the emerging WNP, but would like to use this opportunity to introduce themselves and to set out their intentions for the site.

On Orbit's behalf we have reviewed the WNP and the supporting evidence base and we set out our representations below. On the whole we would like to congratulate Watton Town Council on the production of a detailed and considered document and we make the comments below in this context.

Background

Land at Mallard Road, Watton has a long planning history with outline planning permission granted at appeal in 2017 and the reserved matters application that was submitted back in 2019 still pending determination. Orbit Homes are fully aware of this history and the outstanding objections to the reserved matters application from Watton Town Council and the Watton & Saham Flood Action Group. In this context, we are pleased to confirm that Orbit will be taking over the management of the reserved matters application from the current applicant, Tesni Properties Limited, with a view to undertaking a thorough evidence based review of the issues raised and engaging positively with the Town Council and local residents on the design of revised proposals for the site.

Orbit Homes are the housebuilding arm of Orbit Group who are one of the largest builders and registered providers of affordable housing in the country. Orbit believe everyone is entitled to a good quality home that they can afford

in a place that they are proud to live. 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. They develop both market and affordable housing and they reinvest their profits to improve the quality of their homes and services.

Representations

For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the national Planning Practice Guidance (PPG). We have reviewed the WNP against the basic conditions and have the following observations:

- **Section 8. Housing:**

- Orbit Homes supports the objective *"To ensure any new housing is available, appropriate and accessible to people of all ages and circumstances in order to maintain a balanced and diverse population."*
- We are, however, concerned that **Policy WTN 5** may not achieve this objective with respect to the specific housing needs in Watton. One of the great strengths of neighbouring planning is that it enables communities to identify and plan for their specific needs based on local evidence. It is therefore disappointing to see a policy that simply requires the mix of homes provided to be in accordance with that identified in the SHMA 2017 for the whole of Breckland District. The SHMA is both increasingly out of date and not specific to Watton's needs.
- To ensure that the WNP contributes to the achievement of sustainable development (and therefore meets the basic conditions) we consider that local evidence should be used to inform the required housing mix. We note that AECOM have provided several reports for the WNP and we are aware from their work in other areas that they can produce area specific assessments of housing need that are invaluable in ensuring housing delivery meets local needs.
- The only evidence produced of local housing need that we are aware of is that summarised at WNP paragraph 8.4 which we understand to have been taken from the results of a questionnaire survey. This survey provides some useful insights, but we are concerned that it overrepresents certain demographics given that no need is identified for affordable housing. This is surprising given that district wide evidence in the SHMA identifies that 36% of all homes should be affordable. This highlights the need for a more thorough assessment of local housing needs.
- Orbit Homes requests that the entry for Mallard Road in the table at paragraph 8.3 is amended to read "Orbit Homes" under Builder.

As set out above, on the whole we consider the WNP to be a detailed and considered document and the above observations are made in this context. We hope these comments will help further improve the WNP and we look forward to working with the Town Council on the implementation of the WNP's policies with respect to land at Mallard Road. In this regard, we would be pleased to arrange an initial meeting with the Town Council to discuss our client's emerging proposals.

We would be grateful if you could please confirm receipt of this letter and we look forward to participating further as the WNP examination progresses.



Armstrong Rigg Planning

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