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PLANNING

**Document:** Hearing Statement: Matter 2 - Vision, Objectives,  
and the Spatial Strategy  
**Title:** Examination of the Greater Norwich Local Plan  
2018-2038  
**Client:** Welbeck Land III Limited  
**Date:** January 2022



## **Hearing Statement**

**Matter 2 - Vision, Objectives, and the Spatial Strategy**

**Statement on behalf of Welbeck Strategic Land III Limited in relation to Land  
North of Tuttle Lane East, Wymondham**

**Examination of the Greater Norwich Local Plan 2018-2038**

**January 2022**

## 1. INTRODUCTION

- 1.1 On behalf of Welbeck Strategic Land III Limited (Welbeck Land), James Bailey Planning Ltd (JBPL) are instructed to submit Hearing Statements to the Greater Norwich Local Plan Examination (GNLP).
- 1.2 The site that these Statements relate to is “land North of Tuttle Lane East, Wymondham.” This was previously assigned the site reference GNLP0006 and has been referred to as such in the course of our Hearing Statements.
- 1.3 The Regulation 18(c) GNLP document identified the town of Wymondham as having the need for a contingency of 1,000 dwellings. The land North of Tuttle Lane East was identified as a reasonable alternative site which could assist with this delivery. This proposal has subsequently been removed from the pre-submission version of the Local Plan.
- 1.4 The site area is 53.68ha, with a masterplan strategy for the delivery of 700 dwellings and associated infrastructure including land for a new sixth form centre for Wymondham High School.
- 1.5 It remains the view of Welbeck Land and JBPL that the GNLP is proposing a spatial growth strategy that is fundamentally flawed, and therefore “unsound.” There is an over reliance on long standing strategic site proposals; there is a change in policy direction towards Village Clusters sites which remains unjustified, whilst there is a reduction in proposing development towards more sustainable locations, notably the GNLP’s Main Towns.

### *Matter 2*

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of Matter 2 **Vision, Objectives and the Spatial Strategy** of the Inspector’s Matters, Issues and Questions (MIQs) for the Examination of the Greater Norwich Local Plan.
- 1.7 Welbeck Land agree with the housing numbers currently being proposed in the GNLP, but not the distribution. It should therefore be considered ‘unsound.’
- 1.8 The Statement is intended to assist the Inspector’s review of the questions raised in Matter 2, which is due to be considered for the discussion at the Examination Hearing session on Wednesday 2<sup>nd</sup> February 2022.
- 1.9 These Hearing Statements follow on from the representations made to the Regulation 19 Stage by JBPL, and to Regulation 18(c) Stage by Bidwells, on behalf of Welbeck Land. They should be referred to by the Inspectors during the course of the Examination.

**Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?**

**Question 1. Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?**

- 1.10 The vision for Greater Norwich is clear, although it is questioned whether this is justified via supporting evidence.
- 1.11 Strategic sites that have been identified to support the Vision, such as the East Norwich Strategic Regeneration Area, do not appear to have been rigorously evaluated using current planning policy guidance. (See Hearing Statement on Matter 8 for more detail).
- 1.12 On this basis, it is questioned if the overall Vision remains justified. It is notable that the vision includes:
  - 1.12.1 Express support for new housing in the Cambridge-Norwich Tech Corridor (paragraph 135);
  - 1.12.2 Express support for new housing in market towns (paragraph 136);
  - 1.12.3 Express support for access to sustainable means of transport including rail and a “radical shift” away from car use (paragraph 141).
- 1.13 These issues are all relevant to the spatial strategy.

**Question 2. Are the plan’s objectives soundly based and consistent with the vision and the evidence?**

- 1.14 Although the Objectives are consistent with the Vision, if the Vision is not properly justified or soundly based, then by definition the Objectives will be equally flawed.

**Question 3. Is the reference to clean growth and progression towards a post carbon economy based upon evidence and is it deliverable?**

- 1.15 It is unclear if the evidence for clean growth is justified or deliverable.
- 1.16 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.
- 1.17 It is noted that the Climate Change Statement expressly requires a reduction in the need to travel by car and the highest possible share of trips made by

sustainable travel. However, these measures are not delivered by the provisions for the location of development (Policies 1 and 7).

**Question 4. Is the focus on the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor sound? What other options were considered and why were these dismissed?**

- 1.18 The expansion of important knowledge-based industries in the Cambridge-Norwich Tech Corridor appears to be soundly based.
- 1.19 Unfortunately, what does not appear to have happened is that the associated housing and infrastructure, also required to create balanced and sustainable communities, has equally not followed this same approach.
- 1.20 Main Towns along the route of the Cambridge-Norwich Tech Corridor, such as Wymondham, have not been identified for sufficient housing growth to support the strategic importance of the corridor, notwithstanding new employment allocations.

**Question 5. Is the Plan strategy consistent with the requirement in the National Planning Policy Framework for plans to support appropriate measures to ensure the future resilience of communities to climate change impacts?**

- 1.21 Analysis of the GNLP and its supporting evidence suggests that the strategy for the Plan has not taken into account the latest changes to national planning policy.
- 1.22 The Government has recently recognised that sites allocated for residential or commercial uses are still being delivered on sites in danger from flood risk. This has brought about further rewording of the National Planning Policy Framework (NPPF 2021) in July 2021 regarding flood risk and a focus on ‘all sources’ of flooding (paragraph 161).
- 1.23 The impact of this potential change on the delivery of sites within the Plan is considered to be significant, particularly in relation to larger strategic sites that are being identified within the Plan, notably the East Norwich Strategic Regeneration Area. (See JBPL’s Matter 8 Hearing Statement for further information).
- 1.24 It may be necessary to re-consider all potential allocated sites against the changes to the flooding and the inclusion of surface water flooding if the Plan is to be considered ‘safe’ and in conformity with national policy.
- 1.25 It is also worth identifying that people’s lives and working patterns have drastically altered during the course of the Covid pandemic. The ability to work from home, and the reduction in the necessity to commute to the office, have altered people’s working and personal lives. Although this could not have been

anticipated at the outset of the Plan, it must be worth taking into consideration as this could now have ramifications for the strategy for future development.

- 1.26 As a result, it must be considered that the Plan, in its current form is unsound until the issues identified above are carefully considered and implemented as may be necessary.

**Question 6. Is it clear which policies in the Plan are strategic, and which are non- strategic?**

- 1.27 It is not clear to the reader of the Plan which policies are strategic and which are non-strategic.

## **Issue 2: Housing Growth**

**Question 1. Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national planning policy and guidance?**

- 1.28 The identified housing need appears to be soundly based and accord with national policy.

**Question 2. Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?**

- 1.29 Welbeck Land agrees with the Settlement Hierarchy as set out in Policy 1, which identifies Wymondham as a Main Town. It is important to note that Wymondham is almost twice the size of the next largest Main Town (Diss).

- 1.30 It is the distribution of housing across the Settlement Hierarchy that is believed to be unsound.

**Question 3. Are all of the settlements listed in the correct level within the hierarchy?**

- 1.31 It appears the listed settlements are in the correct level within the Settlement Hierarchy, although again the size and sustainability of the settlements varies within each level.

**Question 4. Is the distribution of growth in line with the settlement hierarchy justified by the evidence?**

- 1.32 It is considered that the GNLP is unjustified and inconsistent in its approach to distribution across the identified Settlement Hierarchy.

- 1.33 It is irrational to distribute such a substantial proportion of the overall housing growth towards smaller settlements rather such as the Village Clusters than Main Towns. Just 15% of new allocations in the GNLP are directed to Main Towns. This is not legally compliant, as its not sound and in accordance with the NPPF and achieving sustainable development. In particular, the infrastructure provision will be easiest to achieve in town locations rather than smaller villages that often have constrained infrastructure such as landlocked primary schools which are unable to expand (please see Matter 3 for examples). Further, Main Towns such as Wymondham are served by rail connections and thus perform far better in terms of sustainable transport objectives. It is very questionable why only 150 dwellings are allocated in Wymondham in a plan which is meant to cover a 20-year plan period, despite it being the largest town in the GNLP area. In Main Towns there is an over-reliance on “commitments” which have not to date been delivered. In particular there is an over reliance on long standing strategic site allocations within the Wymondham Area Action Plan which are unlikely to come to fruition within the plan period.

- 1.34 Furthermore, within the Main Town distribution, certain Main Town sites are prioritised to the detriment of others and the GNLP does not clearly set out its reasoning, rationale, and justification for this approach. This certainly has not happened in the case of identifying a contingency at Costessey at the expense of a far more sustainable alternative site previously identified at Wymondham.
- 1.35 The Partners have not justified why a contingency site has been identified for 800 homes at Costessey, whilst a contingency of a 1,000 homes for Wymondham has been removed. It is apparent that there has been a low delivery of allocated housing sites in Costessey, yet Wymondham as a Main Town on the acknowledge Cambridge-Norwich Tech Corridor only has 150 new homes identified.
- 1.36 At the same time, the Village Clusters have received considerably more homes than the Key Service Centres.
- 1.37 Actively promoting significant housing distribution towards smaller settlements, which will undoubtedly have less infrastructure capacity unlike the planning for large scale development such as new settlements or significant extensions, is perverse and totally contrary to a sustainable plan making.
- 1.38 This radical approach remains unjustified and is not legally compliant. It is unsound and is not in accordance with the NPPF.
- 1.39 (More detail regarding the housing distribution is set out in our previous Regulation 19 representations, and further detail is set out in our Hearing Statement for Matter 3).
- 1.40 Given the approach to distribution of housing for the Plan is inconsistent and wholly unjustified, as such, the GNLP must be found to be unsound.

**Question 5. To what extent does the distribution of housing sites across the settlement hierarchy reflect a policy down approach or one of site availability or previous commitments/allocations?**

- 1.41 Welbeck Land does not agree with the distribution of growth across the Settlement Hierarchy.
- 1.42 It is strongly believed that more growth should be apportioned to the Main Towns, rather than the Village Clusters. Further, the deliverability of growth in Norwich urban area is in doubt. The GNLP is over-reliant on existing commitments which means that new allocations are unevenly distributed through the settlement hierarchy.
- 1.43 The approach followed in the Plan remains unclear, and very confusing.
- 1.44 On the one hand there is an over reliance on existing allocations and commitments being retained in the Plan, which have failed to be delivered over the previous Plan period.



- 1.45 The existing allocations / commitments in both the Long Stratton and Wymondham Area Action Plans have followed through into the GNLP. However, in reality, many of these Area Action Plan sites have already failed to meet their expected delivery timeframes such as WYM2, WYM3, and WYM14. It is therefore a fundamental flaw in the GNLP that there is a reliance on such sites at the expense of properly considered growth across all of the Main Towns. On the other hand there is a new and radical approach being taken towards Village Clusters, which is totally unjustified.
- 1.46 (Further detail is set out in our Hearing Statement for Matter 3).

**Question 6. Is the identification of a supply buffer of 22% against the housing requirement justified?**

- 1.47 The buffer supply provided in the GNLP is welcomed and is considered a positive step forward by the Partners.
- 1.48 However, the question of whether this figure is properly justified is not clear, as some of the identified sites may not be able to yield the housing figures that are anticipated. (See our Hearing Statement on Matter 8).

**Question 7. Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?**

- 1.49 Welbeck Land strongly disagree with the 1,200 homes that has been identified to the Village Clusters Housing Site Allocations Local Plan.
- 1.50 This is a notable change in policy direction that places huge reliance on development of small Village Cluster sites. It is not a sustainable or sound policy, and it is heavily contingent on the successful promotion of a further development plan document.
- 1.51 The figure remains unjustified, with some of the identified sites potentially not being able to yield the housing figures that are anticipated. (See our Hearing Statement on Matter 8).
- 1.52 The South Norfolk Village Clusters Housing Site Allocations Local Plan has only reached regulation 18 draft stage. Therefore, it is unjustified to place any significant reliance on a document that itself has yet to be examined.
- 1.53 Settlements within the 'Village Clusters' are unlikely to be able to provide the adequate infrastructure necessary to maintain the levels of growth proposed within Policy 7, or in the sub area housing allocation plans.
- 1.54 The criteria for the Village Clusters have been set using the primary school catchment areas, but many children will not secure places at schools which are over subscribed, and unable to expand restricting deliverability. Further, focusing on primary school catchments fails to acknowledge that development in such locations may lead to unsustainable patterns of growth as residents may need to travel further to access employment, services, and secondary education.

1.55 (More detail regarding the housing distribution is set out in our previous Regulation 19 representations, and further detail is set out in our Hearing Statement for Matter 3).

**Issue 3: Economy**

1.56 Welbeck Land have no comments to make on Issue 3.

*January 2022*  
**JBPL**



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