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PLANNING

Document: Hearing Statement: Matter 3 - Strategy for the Areas of Growth
Title: Examination of the Greater Norwich Local Plan 2018-2038
Client: Welbeck Land III Limited
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Hearing Statement

Matter 3 - Strategy for the Areas of Growth

**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 site of 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 and 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 3

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of **Matter 3: Strategy for the Areas of Growth (Policy 7)** of the Inspector’s Matters, Issues and Questions (MIQs) for the Examination of the Greater Norwich Local Plan.
- 1.7 The Statement is intended to assist the Inspector’s review of the questions raised in Matter 3, which is due to be considered for the discussion at the Examination Hearing session on Thursday 3rd February 2022.

Issue 1: The Norwich Urban Area including the fringe parishes

A number of sites referred to in this policy, including East Norwich Strategic Regeneration Area (ESRA) and Anglia Square, will be the subject of separate sessions within the hearing programme.

Question 1. Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?

- 1.8 Welbeck Land and JBPL believe that the spatial growth strategy being proposed by GNLP is fundamentally flawed. There is an over reliance on long standing strategic site proposals with a past history that some of them are unlikely to come to fruition within the plan period.
- 1.9 The delivery of 4,000 dwellings in the East Norwich Strategic Regeneration Area is highly questionable considering that the figures have doubled from 2,000 to 4,000 dwellings, and information is lacking to support the considerable constraints that the sites face.
- 1.10 To this end, the Plan must be unsound as it is not justified as it is not based on sufficient evidence.

Question 2. Does Policy 7.1 support the city centre's role as a key driver of the Greater Norwich economy and is it consistent with national policies for ensuring the vitality of town centres?

- 1.11 Welbeck Land have no comments to make on this question.

Question 3. Do the sites listed in the East Norwich section of Policy 7.1 on page 106 of the Plan, form part of the East Norwich Strategic Regeneration Area as defined on the proposals map, other allocations on the proposals map, or potential sites for future development? For example is 'Land East of Norwich City FC' site reference CC16 in the Plan?

- 1.12 It is suggested that the Partners will need to clarify these elements to the satisfaction of the Inspectors as it currently is confusing.

Question 4. Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?

- 1.13 Welbeck Land have no comments to make on this question.

Question 5. Does Policy 7.1 need to be modified to replace references to primary and secondary retail frontages with ‘Primary Shopping Areas’?

1.14 Welbeck Land have no comments to make on this question.

Question 6. Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNLP0360/3053/R10?

1.15 It is considered confusing having both policy 7.1 and policy GNLP0360/3053/R10 which include site specific requirements.

1.16 However, whilst unclear, it appears that policy 7.1 is setting out requirements for the masterplan. It is therefore concerning that once again limited information is provided on the infrastructure requirements that are vital to deliver this site.

Issue 2: The Main Towns

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?

1.17 Welbeck Land have no comments to make on this question.

Question 2. Is Policy 7.2 otherwise justified, effective, and consistent with national policy?

1.18 Wymondham's contribution to the 'Cambridge-Norwich Tech Corridor' is considerable, but is significantly downplayed in the GNLP. Wymondham features within three of the four identified clusters which includes: Agritech, Agrifood, Genetics & Bio Science; IT, AI, Robotics, Digital, Sensors & Big data; along with Advanced Engineering Manufacturing & Minerals. Despite this the GNLP only proposes to allocate 150 new homes to the Main Town of Wymondham. It is the largest of the Main Towns in the GNLP area. The GNLP is heavily dependant on existing "commitments" in Wymondham with less than 6% of the new housing in the plan period in Wymondham proposed to be from new allocations. This is neither a sound nor positive approach to plan making for the largest Main Town.

1.19 The Regulation 18 Draft GNLP included the potential provision of a contingency site around Wymondham for the delivery of up to 1,000 dwellings. JBPL note that the regulation 19 GNLP has since removed this reference to a potential contingency site around the edge of Wymondham, without providing sufficient justification for its removal.

1.20 Given previous comments made above, relating to the quantum of development proposed to come forward in and around the Norwich Urban Area, we have previously questioned the inclusion of a contingency site around Costessey as opposed to Wymondham. The market is already at risk of being saturated around the edge of Norwich with a lack of market interest. Therefore, providing further land for residential development in the same location will not solve the matter. Taking this into consideration Welbeck Land and JBPL propose that the inclusion of land around Wymondham, where much needed education capacity can be provided on site, should be included within the GNLP.

1.21 Considering the comments made above in relation to housing need and the case for flexibility in planned levels of supply, should committed and other sites fail to come to fruition, Welbeck Land and JBPL believe that not only should a contingency site around Wymondham be included, but that the site should be included as an allocation. Allocating the land for housing provides the greatest certainty for this area, with the site being able to be brought forward without delay; it is available and deliverable for housing; and ultimately reduces the need for a future review.

- 1.22 The Plan must be unsound as it is not justified since it is not based on sufficient evidence.
- 1.23 The Plan cannot be interpreted as being in accordance with paragraph 72 of the NPPF as not enough work has been undertaken to identify the necessary infrastructure and facilities that would be required to deliver large scale development in the East of Norwich Strategic Regeneration Area. The site GNL0006 in Wymondham is a greenfield site which can provide the necessary infrastructure to support growth without the constraints that have been identified in the ESRA.

Issue 3: The Key Service centres

Policy 7.4 (relating to Village Clusters) includes an exception sites policy for affordable housing led development, but Policy 7.3 (relating to Key Service Centres) does not. What is the reason for this approach and is it justified? Is Policy 7.3 otherwise justified, effective, and consistent with national policy?

1.24 Welbeck Land have no comments to make on this issue.

Issue 4: Village Clusters

Question 1. Is Policy 7.4 in respect of additional sites justified and effective? Is there a limit to how many such schemes could be allowed within one village?

- 1.25 In the absence of the assessment and suitability of sites and its associated evidence base, the quantum of growth being proposed for the South Norfolk Village Clusters Housing Allocations Plan cannot be relied upon.
- 1.26 The South Norfolk Village Clusters Housing Site Allocations Local Plan has only reached a regulation 18 draft stage. Therefore, it is unjustified to place a reliance on a document that itself has yet to be examined.
- 1.27 In addition, the Village Clusters have been set using the primary school catchment areas, but many of these primary schools are unlikely to be able to expand or provide places to support the necessary growth. No evidence has been provided to assess the level of capacity at the primary schools and whether they are able to expand. This is considered fundamental to this approach.
- 1.28 The Village Clusters webpages on the South Norfolk website state that much of the evidence base to the Village Clusters is shared with the GNLP, however there is an absence of infrastructure capacity evidence including primary school strategies, to support the Village Clusters approach.
- 1.29 For example, in the Reg 18 document the section on Alburgh and Denton states that Alburgh primary school is operating at or near capacity. In addition, whilst the capacity of Dickleburgh Primary School is not raised, the school is on a tight site which is likely to be operating under the DfE BB103 guidelines, and the school is landlocked, and it will not be able to expand. Without knowing the number of spare places at the school, which is a moving position and is likely to change from one year to the next, it is reasonable to assume that any growth in Dickleburgh would need to support a new primary school which would require at least 600 houses to provide the quantum of pupils to sustain it.
- 1.30 The same position applies to: Burston; Forncett St Mary; Hapton; Talconeston; Thurlton; Tivetshall; Windfarthing; and Wrenningham.
- 1.31 In addition, Glebeland Community Primary School in Toft Monks, cannot be delivering sustainable development as the school is remote and isolated. This once again identifies that the strategy to plan around primary school catchment areas is unsound and will lead to unsustainable development contrary to the NPPF.
- 1.32 By focusing on the locations of primary schools, the GNLP risks creating an unsustainable pattern of development. Future occupiers of new homes will have to travel away from the clusters to access employment, services, and secondary education.

- 1.33 It is therefore recommended that Main Towns should be the focus of development and site GNLP0006 is well placed to provide for this.

Question 2. Is it clear what the 'Greater Norwich Local Plan Sites Plan' referred to in the policy is? Is this simply the Greater Norwich Local Plan i.e. the submitted plan?

- 1.34 It is suggested that the Partners will have to explain this, but it is understood this is referring to the core document A2.

Question 3. How does this policy relate to Policy 7.5?

- 1.35 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors

Question 4. Would Policy 7.4 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

- 1.36 Yes, there are a number of villages that are poorly served by infrastructure such as primary school provision, and indeed some schools that are isolated which would lead to a greater use of cars rather than walking or cycling. This has been set out in answer to Issue 4, Question 1 above.

Question 5. Will this policy apply in the area covered by the South Norfolk Villages Clusters Housing Allocations Local Plan?

- 1.37 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors but the whole aspect of leaving this level of delivery to a separate local plan document is concerning.

Question 6. Has any allowance been made within the housing trajectory for such windfall sites?

- 1.38 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.

Question 7. Is Policy 7.4 otherwise justified, effective, and consistent with national policy?

- 1.39 Welbeck Land strongly disagree with the 1,200 homes that has been identified to the Village Clusters Housing Site Allocations Local Plan. In many ways the Village Cluster Sites could be viewed as double counting the types of development that would normally be considered as windfall development rather than allocations. Even if South Norfolk Council did successfully allocate very

small sites in the Village Clusters allocations plan, there would be less by way of windfall.

- 1.40 This has been a significant change in policy direction to significantly increase reliance on development of small Village Cluster sites.
- 1.41 Village Clusters are unlikely to be able to provide the adequate infrastructure necessary to maintain the levels of growth proposed within Policy 7.4, or in the sub area housing allocation plans.
- 1.42 There is an over reliance on the Village Clusters, and whilst it is a novel approach, it is fundamentally flawed and will lead to an unworkable site allocations document, and an examination into each micro area with potential objectors from all sides of a particular village.
- 1.43 Overall, the 1,200 figure remains unjustified, with some of the identified sites potentially not being able to yield the housing figures that are anticipated.
- 1.44 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.

Issue 5: Small scale windfall housing development

Question 1. To what geographical area would Policy 7.5 apply? Would it apply to land on the edges of Village Clusters, Key Service Centres, or Main Towns? Would it apply to land within the South Norfolk Village Clusters Housing Site Allocations Local Plan?

- 1.45 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.

Question 2. Would Policy 7.5 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

- 1.46 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors, but it is unlikely to be in line with NPPF paragraph 78 which states: *“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.”*

Question 3. What does ‘positive consideration will be given to self and custom build’ mean in the context of the policy? Is this necessary? Is this justified? Is this an effective approach?

- 1.47 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.

Question 4. Is the policy effective in the way in which it would work? Is it justified that the policy allows 100% market housing?

- 1.48 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.

Question 5. Are the caps on development within each parish capable of operating effectively in the event that multiple applications are lodged around the same time?

- 1.49 It is suggested that the Partners will need to demonstrate these elements to the satisfaction of the Inspectors.

Question 6. Is the assumed contribution of 800 dwellings from this source justified?

- 1.50 With over 175 parishes in the plan area, the number of houses that could be constructed under Policy 7.5 exceeds 800 dwellings which will result in an oversupply.
- 1.51 Paragraph 184 states demand will determine whether windfall development is instead of, or in addition to, allocated growth. This position the GNLP places on development from windfall sites is questionable and it would be more robust to plan properly for growth via allocations.

Issue 6: Preparing for new settlements

Policy 7.6 does not relate to provision in this Plan and as paragraph 395 states this Plan identifies enough sites to meet current needs. On this basis, is Policy 7.6 justified? What justification is there for any reference at all to proposals which may or may not form part of a future plan?

The supporting text to Policy 7.6 indicates that, whilst there are enough sites to meet needs in this plan period, the delivery of new settlements may occur from 2026 onwards. This is only 4 years from the adoption of this Plan. Does the evidence support that delivery could really be that soon after the adoption of this plan? What effect would this have on land supply in the plan period given that a significant buffer has already been included in the housing provision in the Local Plan including a contingency site.

1.52 Welbeck Land have no comments to make on this issue.

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