



# Greater Norwich Local Plan Examination

## **Matter 3 Hearing Statement**

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## MATTER 3 – STRATEGY FOR AREAS OF GROWTH

### Issue 2 – The Main Towns

Q1 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?

1.1.1 Gladman note that there has been a historic rate of under provision of affordable housing in the Greater Norwich Area and the appeal decision in November 2020 in Brundall (ref: APP/K2610/W/19/3239986) confirmed that the shortfall in affordable housing delivery was significant across the districts. The 2019-20 AMR (published in September 2021) demonstrates a shortfall of 34 affordable units since the 2015 base date of the SHMA, however the aforementioned appeal confirmed a significant shortfall of 1,700 affordable homes since 2008/09. It is also worth highlighting that whilst the delivery of affordable homes has improved over the last three years, in only one year (2018/19) has the number of completions exceeded the future proposed requirement of 669 affordable units per year.

1.1.2 It is therefore Gladman's view that affordable led housing development exception sites should be included to Policy 7.2 for Main Towns, as it is recognised widely that typically greenfield sites deliver significantly more affordable housing than the percentages delivered on brownfield sites. Such sites would also assist the Council in addressing their significant shortfall in affordable housing delivery, and therefore believe that this approach to not include a clause focusing on affordable housing led housing developments at Policy 7.2 to be unjustified.

Q2 Is Policy 7.2 otherwise justified, effective and consistent with national policy?

1.1.3 Policy 7.2 outlines the five settlements which are classified as the Main Towns as being Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham, and allocates a total of 6,806 homes, equating to around 14% of the proposed housing growth. The supporting text at paragraph 346 states that these settlements "are

*engines of rural growth and it is important that they are enabled to grow at appropriate scales, having regard to infrastructure and environmental issues, to enable them to thrive.”* It is clear from this statement therefore that the Main Towns perform a key economic and social function across Greater Norwich. Gladman consider that the distribution of just 14% of overall growth across the five towns is therefore insufficient and will not be effective in ensuring they are able to continue this vital role, especially with regards to the Main Towns of both Diss and Wymondham.

- 1.1.4 Catalysed by the COVID-19 pandemic, the emerging patterns of urban migration characterising the UK highlight the inappropriateness of Policy 7.2 in allocating such a limited amount of growth to the Main Towns. As an increasing proportion of the population of Greater Norwich continue to migrate out from the main urban areas, the social cost of allocating development to the Norwich urban area rather than market towns will only become more severe. As this trend of counter-urbanisation is likely to be further exacerbated by forthcoming technological advancements, the GNLP must take account of this accelerating demographic trend and ensure a greater proportion of housing development is allocated to areas where it is, and will increasingly become, desired.

### Wymondham

- 1.1.5 Wymondham is one of the five Main Towns and offers good transport links, including mainline services to Norwich, Cambridge and Stansted Airport. The service provided at Wymondham Railway Station is to be improved following the awarding of funding from the Transforming Cities Fund<sup>1</sup> which will provide step-free access to the Cambridge-bound platform, which is currently unavailable<sup>2</sup>. The Town acts as the main town serving the south-west of Greater Norwich and has potential to contribute to the development of the Cambridge Norwich Tech Corridor<sup>3</sup>. Wymondham is strategically located at the heart of the A11 Cambridge – Norwich Tech corridor. Without sufficient employment and housing land allocated to the town, Wymondham

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<sup>1</sup> As set out in Paragraph 369 of the GNLP Regulation 19

<sup>2</sup> Norwich Transforming Cities Fund (May 2020)

<sup>3</sup> As set out in Paragraph 367 of the GNLP Regulation 19

will fall short of being able to achieve its full economic potential. Taking into consideration the excellent transport links and strategic location, Gladman contend that the allocation of just 150 new homes to the Main Town is therefore neither justified nor effective.

- 1.1.6 The GNLP attempts to justify the low figure of only 150 new homes directed towards Wymondham on the basis of development land having previously already been identified through the Wymondham Area Action Plan (AAP). The Wymondham AAP was adopted in October 2015 and only covers the period through to 2026. The purpose of the AAP was to provide a framework and allocate sufficient sites for the delivery of 2,200 new homes in and around Wymondham over the period 2008-2026. At the point of adoption, the AAP stated that the 2,200 homes already had planning permission, or a resolution to grant permission.
- 1.1.7 Given that as far back as 2015 the planned growth for Wymondham was already permitted, and this growth was only due to cover a period through to 2026 compared with the timeframes of the GNLP to 2038, Gladman have serious concerns that the further allocation of just 150 dwellings will not be sufficient in order to ensure Wymondham is able to *'thrive'* as Policy 7.2 intends<sup>4</sup>.
- 1.1.8 Gladman note that the Regulation 18 Draft GNLP included the potential for the provision of a contingency site around Wymondham for the delivery of up to 1,000 homes, however the Regulation 19 Plan has removed the reference to a potential contingency around Wymondham. Gladman question why the contingency was removed if Wymondham had been viewed as being capable at one stage of accommodating that additional quantum of growth.
- 1.1.9 As set out in para 1.1.5 of this statement, given the emerging patterns of counter-urbanisation as a result of the COVID-19 pandemic, continuing to include a contingency site on the edge of the Norwich Urban Area seems counterproductive, especially as the need for the contingency site to come forward will most likely be as a result of the market failing to deliver the homes around the edge of Norwich. Rather

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<sup>4</sup> As set out in Paragraph 346 of the GNLP Regulation 19

than relying on a contingency, Gladman believe that greater certainty would be provided if the 1,000 homes were allocated around Wymondham.

- 1.1.10 The supporting text for Policy 7.2 in relation to Wymondham states that the strategic gaps identified through this plan and other policies in the development plan aim to prevent coalescence of Wymondham with Hethersett<sup>5</sup>. This point is also relevant to Matter 4, Issue 1, Question 5 *'Is it clear what purposes Strategic Gaps are intended to serve and how development proposals within them will be assessed?'*.
- 1.1.11 Gladman consider that through the GNLP process, the strategic gaps should have been reviewed and revised. Since they were last reviewed development has come forward within them and they have not been altered to take account of such development. An example of this is clear in the strategic gap between Wymondham and Hethersett, where permitted development to the north of Norwich Common has significantly altered the character of the area. Gladman therefore believe that the 'roll over' of the strategic gaps, without a thorough evidence-based assessment, is neither justified nor sound.

### Diss

- 1.1.12 Paragraph 355 acknowledges that Diss is *"strategically located on the Norwich to London railway line and the A140 and A143 provide road links to Norwich, Ipswich, east coast ports and Bury St. Edmunds. Diss is also a hub for local bus links"*. Further, paragraph 355 states *"Diss has the widest range of shops and services of the main towns, as well as a broad range of employment opportunities mainly located to the east of the town centre close to the railway. The shops and services are mainly within the attractive town centre of Diss, which has significant pedestrian priority areas, along with supermarkets on Victoria Road."* Considering its demonstrable and acknowledged sustainability, Gladman believe the role Diss plays to the rural hinterland should not

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<sup>5</sup> As set out in Paragraph 370 of the GNLP Regulation 19

be overlooked. Accordingly, Gladman submit that Diss must take a greater level of growth, beyond the additional 400 homes already allocated to Diss<sup>6</sup>.

1.1.13 As detailed in paragraphs 359 and 364 of Policy 7.2, the total level of growth proposed for Diss is largely similar to that of Harleston. Considering local circumstances, this similarity is largely unjustified and thus this growth strategy is ineffective. Specifically, Harleston does not benefit from the same transport links as Diss and it serves a much-reduced retail catchment, thus residential development within Diss should not be limited to the same extent as in Harleston. In redistributing growth away from the Norwich urban area to the main towns focusing this redistributed growth in Diss, the strategy of growth across the main towns will be more representative of local circumstances.

1.1.14 Gladman dispute the GNNDP's claim that highways constraints within Diss limit the settlement's capability to accommodate any further growth beyond the additional 400 homes set out in paragraph 359. This claim made by the GNNDP is based upon local evidence, the Diss Network Improvement Strategy (February 2020), which Gladman do not recognise as sound evidence for the justification of Policy 7.2 due to the limited range of matters considered in this document (see Regulation 19 representations). Further, given the local provision of public transport and the pedestrianisation of Diss' town centre, highways issues may largely be offset through sensitively designed proposals. Consequently, through the inclusion of Travel Plans, Transport Assessment and Statements in applications where these are deemed necessary, there is no justification for limiting development within Diss on these grounds.

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<sup>6</sup> As set out in Paragraph 359 of the GNLP Regulation 19

## Issue 3 – The Key Service Centres

Q1 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?

1.1.15 In regard to this question, we reiterate the comments outlined previously in relation to the same question for the Main Towns.

Q2 Is Policy 7.3 otherwise justified, effective and consistent with national policy?

1.1.16 Policy 7.3 outlines the settlements which are classified as the Key Service Centres and allocates a total of 3,679 homes equating to around 7% of the proposed housing growth. The supporting text at paragraph 372 explains that these settlements *“have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas. This role is intended to continue with development taking place at appropriate levels.”* From this summary it can therefore be surmised that Key Service Centres are viewed as being sustainable settlements that are able to accommodate growth in order to meet the local need for housing and encourage growth within the community.

1.1.17 Gladman note that the total number of homes allocated to the Key Service Centres is less than the provision allocated to the Village Clusters by 541 homes, this could therefore be deemed as being disproportionate in the settlement hierarchy.

1.1.18 Gladman believe that there are settlements classified as a Key Service Centres as per Policy 7.3 which are capable of accommodating further growth then they have been allocated. Namely, Poringland/Framingham Earl as the second largest Key Service Centre could and should accommodate additional levels of growth to boost the housing numbers in this tier and within the settlement. Given its location relative to Norwich and the facilities that are located within its confines, Poringland is an excellent candidate for additional growth through this plan despite the number which have already been attributed to it.



- 1.1.19 Gladman also dispute the claim made at paragraph 373 that *“high amounts of existing commitments and environmental and infrastructure constraints limit the potential for additional housing growth through this plan at Blofield, Brundall, Poringland / Framingham Earl and Reepham.”*. It is Gladman’s view that the number of existing commitments alone is not a suitable justification for limiting growth in such settlements. Rather settlements should be assessed as a whole and incorporate the existing commitments into the infrastructure capacity assessments rather than separating these. It could also be said that if a settlement has been deemed as suitable and sustainable to accommodate further growth previously, by having sizeable commitments in past plans, that the settlement should still be deemed as suitable and sustainable as the fundamental location and composition of the settlement has not changed.
- 1.1.20 As stated at paragraph 1.1.18, it is Gladman’s view that Poringland/Framingham Earl remain suitable and sustainable settlements for growth within the GNLP and have the capacity to accommodate further growth than what it is currently allocated.