



James Bailey
PLANNING

Document: Hearing Statement: Matter 6 - Homes (Policy 5)
Title: Examination of the Greater Norwich Local Plan
2018-2038
Client: Welbeck Land III Limited
Date: January 2022



Hearing Statement

Matter 6 – Homes (Policy 5)

**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 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 6

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of Matter 6: **Homes (Policy 5)** 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 6, which is due to be considered for the discussion at the Examination Hearing session on 9th February 2022.

Issue 1: is the Policy for affordable housing justified, effective and consistent with the evidence and national policy?

[Please note Welbeck Land and JBPL are only responding to Question 8 of Issue 1 below].

Question 8: Is the requirement for specialist older people's accommodation, including care homes, to provide an affordable housing contribution justified and consistent with national policy? Have these requirements been subject to viability testing?

- 1.8 Paragraph 275. in Part 1 of the draft Plan states: "The Local Plan is seeking to assist Norfolk County Council's target of reducing residential care home and nursing home dependency and to support people to remain independent and in their own homes."
- 1.9 With regard to the above statement Welbeck Land and JBPL suggest it is not justified for care homes to provide such a high percentage (33%), if any at all, of affordable housing, when there is a firm aim within Norfolk County Council to reduce care home dependency.
- 1.10 Whilst the principle of specialist housing is generally supported, clarity is required on providing affordable housing. The Viability Report (2020) has made no account of specialist older people's housing in determining the viability of delivering 33% affordable housing. On this basis the requirement should be deleted as it is not evidence based.
- 1.11 More specifically, it is not considered that residential and nursing care homes constitute dwellings that generate a requirement for affordable housing provision. In addition, it is considered that the policy should provide a definition as to what is specialist older people's housing. Without this information, the policy is not considered to be effective.
- 1.12 As there is limited evidence in the draft Plan to suggest any viability testing has been undertaken on this matter it is considered detrimental to the 'soundness' of the Plan. Additionally, it cannot be said that the affordable housing contribution is consistent with National Policy.
- 1.13 The NPPF paragraph 62, outlines the requirement for versatile and varied type and tenure of properties. However, it does not make explicit reference to care homes and older people's accommodation providing affordable housing.
- 1.14 The NPPF paragraph 65 states there is an exemption for purpose-built accommodation for the elderly to provide affordable homes. The proposed affordable housing requirement is inconsistent with national policy.

Issue 2: Accessible and Specialist Housing

1.15 Welbeck Land does not wish to make a comment on Issue 2.

Issue 3: Gypsies and Travellers, Travelling Show People and Residential Caravans

1.16 Welbeck Land does not wish to make a comment on Issue 3.

Issue 4: Purpose built Student Accommodation

1.17 Welbeck Land does not wish to make a comment on Issue 4.

Issue 5: Self/Custom Build housing

1.18 Welbeck Land does not wish to make a comment on Issue 5.

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