



**James Bailey**  
**PLANNING**

**Document:** Hearing Statement Matter 11 - Housing and mixed-use allocations - sites currently allocated in an adopted development plan, without planning permission

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

**Client:** Welbeck Land III Limited

**Date:** February 2022

## **Hearing Statement**

**Matter 11 – Housing and mixed use allocations – sites currently allocated in an adopted development plan, without planning permission**

**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**

**February 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 11*

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of Matter 11 **Housing and mixed use allocations – sites currently allocated in an adopted development plan, without planning permission** 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 11, which is due to be considered for the discussion at the Examination Hearing session on Tuesday 8<sup>th</sup> March 2022.
- 1.8 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.
- 1.9 There is a distinct absence of references to “Wymondham” within the GNLP. Wymondham is a Main Town within the Settlement Hierarchy, and the largest settlement in South Norfolk District, and is identified as an important settlement within the Norwich-Cambridge Arc. It previously featured within the Norwich Policy Area inferring an importance beyond the Partnerships geographical area.

It also has a railway station providing easy and direct access to both Norwich and Cambridge. As set out in the recently published Transport for New Homes report “Building Car Dependency” (2022), to reduce private car trips, new homes need to be built in places which can be served by a modern public transport network and where residents are able to walk or cycle within the development and into and out of it to the adjacent urban area. Proximity to a railway station is an important factor in the delivery of sustainable development. It is therefore surprising that there is not more housing being identified towards Wymondham.

- 1.10 The Plan remains largely silent on Wymondham, and instead appears to rely heavily on the delivery of sites in the adopted Wymondham Area Action Plan. At present, identified sites still remain undelivered, whilst others are still to come forward through planning applications.
- 1.11 The Area Action Plan (AAP) was supposed to run until 2026 and delivery 2,200 dwellings, at which point the secondary education capacity was considered to be a potential cap on growth to the Town, with the Academy Trust who run Wymondham High School at that time stating they did not want to operate a split school site, (which would increase capacity). The education situation has moved on since the adoption of the AAP, although this does not appear to have been considered, investigated, or reflected in the GNLP.
- 1.12 There does not seem to be an adequate education strategy within the GNLP evidence base. The Infrastructure Needs Report (B12) is significantly lacking regarding secondary school provision, place planning, or associated costs, and is simply a factual record of the school positions now, rather than planning how schools will deal with the children arising from growth across the GNLP area. Once again, the conclusions of the Wymondham Area Action Plan seem to be being used to limit any further consideration of Wymondham, without undertaking an up-to-date assessment and what could be done to expand the existing schools.
- 1.13 When considering the housing trajectory the GNLP is basing its reliance on its housing delivery for Wymondham through the historic AAP sites. If these sites are delivered by 2026 as programmed, this then suggests that only minimal growth is anticipated between 2026 and 2038, for one of the Main Towns in the Norwich-Cambridge Arc. This cannot be viewed as delivering sustainable development.
- 1.14 The approach in the GNLP towards Wymondham does not appear to represent a sound, logical, or sustainable approach.

**Are the proposed site allocations listed below soundly based?**

**Question 1. Is the allocation on track within the existing development plan?**

- 1.1 This Matter and inspectors' questions has omitted Wymondham Area Action Plan policy WYM 1 - Allocation of land at Friarscroft Lane – as the site does not have an extant permission and therefore should be assessed. Application 2020/2298 for 14 dwellings was withdrawn in August 2021.

**Question 2. If the allocation has not come forward as previously expected, what is the reason for this? Is there a reasonable prospect that it will be development in the plan period?**

- 1.2 It is understood the majority of the site consists of an area of mature trees and the site is prone to flooding.
- 1.3 It is suggested that the Partners will need to clarify these elements to the satisfaction of the Inspectors.

**Question 3. Has the availability, viability and deliverability of the site been robustly assessed?**

- 1.4 No affordable housing provision was proposed with the withdrawn application.

**Question 4. Does the evidence support the delivery of the housing units on the expected trajectory? (Document 3.2C)**

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

**Question 5. Are the detailed policy requirements that would apply to the allocation justified and effective?**

- 1.6 If the site is now not deliverable it's Wymondham Area Action Plan allocation is questioned and it should be compensated within the GNLP.

**Question 6. Is any proposed uplift in capacity, or extension to the site, justified and supported by the evidence?**

- 1.7 Welbeck Land does not wish to make a comment on this question

*February 2022*  
**JBPL**



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