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**PLANNING**

**Document:** Hearing Statement Matter 15 -Housing Provision

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

**Client:** Welbeck Land III Limited

**Date:** February 2022



## **Hearing Statement**

**Matter 15 – Housing Provision**

**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 Tuttlles 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 Tuttlles 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.

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 15*

- 1.5 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of Matter 15 **Housing Provision** of the Inspector’s Matters, Issues and Questions (MIQs) for the Examination of the Greater Norwich Local Plan.
- 1.6 The Statement is intended to assist the Inspector’s review of the questions raised in Matter 15, which is due to be considered for the discussion at the Examination Hearing session on Wednesday 9<sup>th</sup> March 2022.
- 1.7 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.
- 1.8 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.

- 1.9 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.
- 1.10 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.
- 1.11 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.
- 1.12 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.
- 1.13 The approach In the GNLP towards Wymondham does not appear to represent a sound, logical, or sustainable approach.

**Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? In particular:**

**Question 1. Should Table 6 of the Plan be updated to a base-date of 1<sup>st</sup> April 2021?**

- 1.14 Welbeck Land considers this a sensible proposal, however it is suggested that the Partners will need to respond to the Inspectors.

**Question 2. Taken as a whole, do any alterations to the site specific delivery assumptions (arising under previous matters) significantly alter the overall housing land supply position?**

- 1.15 It is apparent that there has been a low delivery, or in some instances no delivery, of allocated housing sites in the Wymondham Area Action Plan, which in conjunction with windfall allowance and South Norfolk village clusters, and under provision at East Norwich Strategic Regeneration Area, it is our position that the land supply position would not be sufficient. In respect of ESRA, both the overall quantum and the delivery rate need to be adjusted to reflect the fact that a more reasonable assumption for the total capacity of the allocations is *at most* 3,200 houses, and it is highly unlikely that delivery will begin before 2024/5 in light of the significant constraints identified. These points do not seem to be disputed. See Appendix 2.

**Question 3. Is it justified to identify contingency sites within the Plan?**

- 1.16 It is our understanding that only one contingency site is proposed and Wellbeck Land remain unconvinced about the choice of site selection. Contingency sites are necessary, but due to the reduction in dwelling numbers at ESRA and lack of delivery on previously allocated sites it is requested that contingency sites should instead be allocated outright rather than as contingency. As reaffirmed by the Partnerships Matter 8 Hearing Statement which states 3400 rather than 4000 homes are planned for and this number could be further reduced when stage 2 of the masterplan which involves viability and assessments of constraints is completed. In fact the capacity of ESRA is likely lower than that because (a) the figure assumes that the whole of the Utilities Site is within the Plan area, but the area identified as "Marina Village" in the Stage 1 Masterplan is in the Broads; and (b) Historic England have identified capacity constraints on the Carrow Works site. The quantum of housing to be delivered in the Village Clusters is also doubtful. The supply figures are thus overstated.
- 1.17 Further, as explained by the Partnership in Matter 1, an up to date assessment of housing needs indicates that needs are greater than those identified when the housing requirement was set. The claimed buffer for flexibility has thus been entirely consumed and new allocations should be made.
- 1.18 In addition only choosing one contingency site, as currently planned, leaves a vulnerable position for the GNLP. If a contingency is needed as per policy (GNLP0581/2043), due to there being more than 15% below annual housing targets

in three consecutive years, similar delivery problems may have arisen for the single contingency site. The identification of a further contingency site which is deliverable and which scores highly in the Partnership's own assessments is therefore desirable. As previously explained, if the same mitigation assumptions are applied to the Wellbeck Land site GNLP0006, identified as a contingency in the Regulation 18(a) plan, as applied to the Costessey contingency then it scores as highly or better than the preferred contingency. It also lies in the Strategic Growth Area, the Cambridge-Norwich Tech Corridor and is served by a railway station.

- 1.19 It is questioned whether other alternative sites have been assessed as suitable contingency sites. Is the single site identified the best, and does it provide the best strategy to infrastructure delivery? In addition, the approach to having one contingency site is not sound in case the GNLP delivery targets are not met, and choosing one site leaves the GNLP in a vulnerable position.
- 1.20 It is evident from the Infrastructure Needs Report (B12.1 December 2020), as stated in paragraph 4.3 regarding new build school provision, and CIL contributions which would be used towards delivery of a new primary school, that; "*This contribution does not cover the full cost of school expansions in Greater Norwich and Norfolk County Council uses Basic Need and other central Government grants to fully fund these projects with agreement that any shortfall as a last resort is underwritten by Norfolk County Council funding*". This borrowing comes at the cost of the taxpayer so further scrutiny of whether it would be better to direct growth to planning areas that can already be planned to be able to accommodate growth, rather than a completely new education site.
- 1.21 There is also further uncertainty about whether there is a need for a new primary school at Costessey as the Statement of Common Ground, (Appendix within Matter 5 Hearing Statement from Terra Strategic) between EHP Consultants and Norfolk County Council is in relation to 2ha land for sixth form provision, not the 4 ha identified within policy GNLP0581/2043. This is in conjunction with the Costessey and Bowthorpe Primary planning area having an overall surplus of primary school places from the six primary schools both in 2024/25 and 2030/31, also referred to in the Education Impact & Mitigation Assessment by EHP.
- 1.22 Again, this demonstrated there is a significant flaw in the (lack of) education strategy for the GNLP, and further assessment needs to be undertaken rather than simply selecting a contingency site seemingly at random.

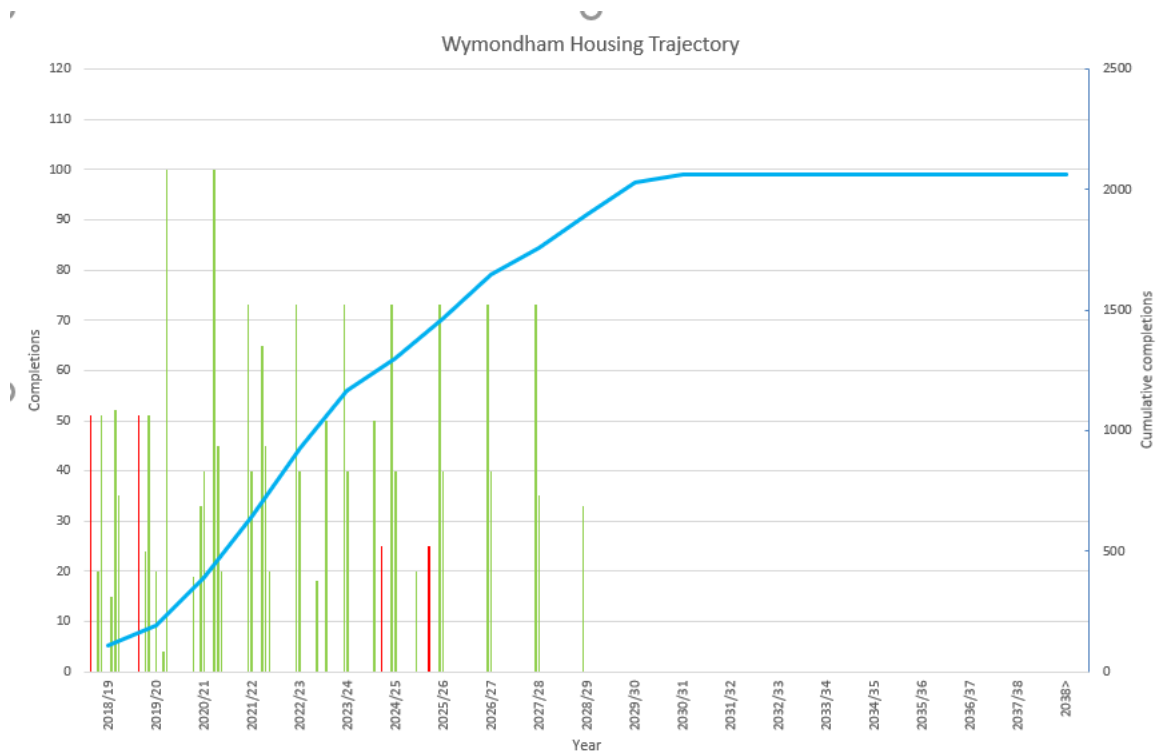
**Question 4. Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?**

- 1.23 It is apparent that there has been a low delivery, or no delivery, of allocated housing sites in the Wymondham Area Action Plan, which in conjunction with windfall allowance and South Norfolk village clusters, as well as under provision at East Norwich Regeneration Area it is our position that land supply would not be sufficient. The table below details that Wymondham Area Action Plan sites have been slow to deliver.

Allocation	Approx. Dwellings	Delivery
<u>WYM 1</u> - Allocation of land at Friarscroft Lane	20	0
<u>WYM 2</u> - Allocation of land at old sales yard and Cemetery Lane - 2016/2668	64	2022-2025 (58 RM permission 02 June 2021 – 0% affordable housing)
<u>WYM 3</u> Land at South Wymondham	1,230	Multiple sites form this allocation. The Annual Monitoring Report 2019-20 along with D3.2C update indicates that 997 dwellings are programmed to be delivered during the plan period.

**Question 5. Are the assumptions for homes to be delivered on existing commitments justified? Will 31,452 homes will be delivered on these sites between April 2020 and 2038?**

- 1.24 Welbeck Land are concerned that there will be under delivery or slow delivery set against the housing trajectory. There is already a reliance on Wymondham Area Action (up to 2026) Plan allocations which, although it is not clear as the underlying data is not provided, the GNLP trajectory flattens growth out in the following 12 years for the GNLP.
- 1.25 Due to the lack of underlying evidence provided by the Partners, a trajectory for Wymondham has been produced by JBPL from core document D3.2C along with Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2019-20 Appendix A (parts 4d and 5).



Wymondham housing trajectory (red columns denote GNL sites, Green Columns other Wymondham commitments including AAP sites – see Appendix 1)

- 1.26 As can be seen from the trajectory (including data in Appendix 1) moderate completions (highest of 278 dwellings in 2022/23) are projected to take place between 2018 and 2029. This leads to a cumulative growth on 2,063 dwellings projected to be completed by 2029 with no further housing growth before 2038. The remaining plan period therefore receives no further growth in Wymondham which is the largest Main Town, within the Strategic Growth Corridor and ultimately the second most sustainable location in the Greater Norwich plan area. The majority of this growth has been determined outside of the plan period from sites allocated in the Wymondham Area Action Plan, and only two sites are proposed to be allocated for a total of 150 dwellings in the GNL. The GNL cannot therefore be considered to be delivering sustainable development.
- 1.27 A significant proportion of the growth in the last ten years of the plan will be delivered through ESRA which is likely to be balanced towards flatted schemes and therefore it will not deliver a variety of house types over the plan period. This is especially pertinent when flats seen Norwich have minimal price movement since the property crash in 2008. This is because there is a lower demand for flats in Norwich than Norfolk and East of England as a whole. Reliance on flats at East Norwich is therefore seriously questionable especially timing and pace of delivery of sites, and alternative sites such as Wymondham GNL0006 should be allocated to assist in providing a variety of house types. We have already set out broader concerns about the trajectory for (and overall capacity of) ESRA.

**Question 6. Can the market absorb the number of additional homes envisaged in and around Norwich City Centre? Is this supported by demonstrable evidence?**



- 1.28 It is suggested that the Partners will need to demonstrate this to the satisfaction of the Inspectors. However, it is noted that the unprecedented assumed output from ESRA is not supported by any evidence. There is considerable doubt that the annual output of up to 500 homes from ESRA can be absorbed.

**Question 7. Is there compelling evidence that the proposed windfall allowance (of 1,296 dwellings) will provide a reliable source or supply?**

- 1.29 It is questioned whether some of the South Norfolk Village Clusters proposed growth would have actually been classed as windfall so there may be an element of double counting and depending on how they are classed (allocated or windfall) one aspect of the GNLP will not deliver.

**Question 8. What confidence is there that the South Norfolk Village Clusters Plan will identify sites for a minimum of 1200 homes and that these site can be delivered by 2038? Is it appropriate for this to be a minimum requirement?**

- 1.30 There cannot be confidence in this. The process depends on multiple small allocations being made and there has been no proper testing of this approach, which by the Partnership to be novel.

**Question 9. What confidence is there that the Diss and area Neighbourhood Plan will identify sites for 250 dwellings and that these sites can be delivered by 2038?**

- 1.31 It is suggested that the Partners will need to demonstrate this to the Inspectors.

**Question 10. Does the Plan identify that at least 10% of the housing requirement will be met from sites no larger than one hectare in accordance with Paragraph 69 of the Framework?**

- 1.32 It is suggested that the Partners will need to demonstrate this to the Inspectors.

*February 2022*  
*JBPL*

Appendix 1 – Wymondham Housing Trajectory data (highlighted cells in Column Ref are Wymondham Area Action Plan sites).

Ref	App Type	Net Hom	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038>	
GMLP0354R		100								50	50													
GMLP3013		50											25	25										
2015/2380	Detailed	107	8	15	31	55	21																	
2015/2168	Detailed	63			20	24	19																	
2016/2586	Detailed	102		19	51	51																		
2012/0371	Outline	577			0	0	33	73	73	73	73	73	73	73	33									
2015/1280		10																						
2015/1760			45	14																				
2015/1649			58	31																				
2014/2495	Outline & part d	335			0	20	40	40	40	40	40	40	40	35										
2014/2042	Detailed	15			15																			
2015/1405	Detailed	69			52	4																		
2019/0536	Detailed	300			35	100	100	65																
2014/0799	Outline	90			0	0	45	45																
2016/2668	Outline	58			0	0	20	20	18															
WYM1	Allocation	20									20													
	Cummulative	0	111	190	394	648	926	1169	1300	1463	1646	1759	1897	2030	2063	2063	2063	2063	2063	2063	2063	2063	2063	2063
	Dwellings / year		111	79	204	254	278	243	131	163	183	113	138	133	33	0	0	0	0	0	0	0	0	0

## Appendix 2

### **ESRA trajectory**

#### Key points:

- (1) The Partnership recognised that the best evidence of capacity for the ESRA site is the Stage 1 Masterplan.
- (2) That shows a total of 3,469 houses, 238 of which are not within the allocations. Accordingly, the allocation should be for, at most, 3,231 homes. The trajectory should be adjusted accordingly.
- (3) The trajectory advanced by the Partnership suggests delivery of over 100 dpa from 2024/5. It was accepted in the Matter 8 hearing that this was not likely to occur since the Carrow Works site could not begin to deliver by that year.
- (4) A more realistic assumption is that delivery will begin after 2026.
- (5) The trajectory is not well explained and is said to be subject to further testing. It assumes an unprecedented delivery rate of up to 500 dpa. Lichfields' evidence suggests a maximum build out rate of 286 dpa. Revised trajectories are suggested below.

2024/5	2025/6	2026/7	2027/8	2028/9	2029/30	2030/1	2031/2	2032/3	2033/4	2034/5	2035/6	2036/7	2037/8	Total	
100	100	100	100	300	400	300	500	300	500	300	400	300	300	4000	<b>GNLP proposal</b>
															<b>Adjust for capacity reduction (evenly distributed across trajectory)</b>
81	81	81	81	242	323	242	404	242	404	242	323	242	242	3231	
			81	81	81	81	242	323	242	404	242	404	242	2423	<b>Adjust for delayed start and capacity reduction</b>
			81	81	81	81	242	286	242	286	242	286	242	2150	<b>Adjust for delayed start, capacity reduction and cap at 286pa</b>
100	100	100	19	219	319	219	258	14	258	14	158	14	58	1850	<i>Shortfall against GNLP</i>
475	556	689	470	718	852	679	750	380	600	350	450	425	482	7876	Norwich forecast (GNLP)
375	456	589	451	499	533	460	492	366	342	336	292	411	424	6026	Norwich forecast (adjusted)
21.05%	17.99%	14.51%	4.04%	30.50%	37.44%	32.25%	34.40%	3.68%	43.00%	4.00%	35.11%	3.29%	12.03%	23.49%	<i>% shortfall for Norwich</i>



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**PLANNING**

