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PLANNING

Document: Hearing Statement Matter 16 - Monitoring

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

Client: Welbeck Land III Limited

Date: February 2022

Hearing Statement

Matter 16 – Monitoring

**Statement on behalf of Welbeck Strategic Land III Limited in relation to Land
North of Tuttles 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 16

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of **Matter 16 Monitoring** 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 16, which is due to be considered for the discussion at the Examination Hearing session on Thursday 10th 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.

Is the Monitoring Framework set out in Appendix 3 of the Plan effective in delivering the policy requirements during the Plan period? In particular:

Question 1. Are the proposed indicators and targets appropriate and measurable? Are they clearly time related such that they can be monitored during the Plan period, rather than at the end of it? Are they clearly expressed as targets rather than objectives? Are any others necessary for monitoring to ensure soundness of the Plan?

- 1.15 The AAP was adopted in 2015 and delivery is questioned. In relation to the only contingency site identified in the reg 19 local plan, policy GNLP0581/2043, which can only come forward if housing completions in Greater Norwich are more than 15% below annual targets in each year and where under delivery is the result of site specific constraints. Welbeck Land are not certain that the monitoring framework specifically picks this out. Monitoring Indicator Code GNLP21 only monitors the total number of dwellings completed. There is no specific reference to 15% below annual targets which is expected to be 1,666 $(1,961 \times .15) - 294.15$.

Question 2. Does the monitoring framework clearly set out what actions will be taken if targets and policies are not being achieved?

- 1.16 No, not in relation to the contingency site delivery

Question 3. Is the Monitoring Framework effective in supporting the process of reviewing the Local Plan to assess whether it will need updating at least once every five years in accordance with paragraph 33 of the National Planning Policy Framework?

- 1.17 Welbeck Land consider this is a question to be best answered by the Partnership.

***February 2022
JBPL***

