



**James Bailey**  
**PLANNING**

**Document:** Hearing Statement Matter 9 - Residential based allocations - new sites without planning permission that are allocated for more than 500 dwellings.

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

**Client:** Welbeck Land III Limited

**Date:** February 2022

## **Hearing Statement**

**Matter 9 – Residential based allocations – new sites without planning permission that are allocated for more than 500 dwellings**

**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 Tuttlés 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 Tuttlés 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 9*

- 1.6 This Hearing Statement has been prepared on behalf of our client Welbeck Land in respect of Matter 9 **Residential based allocations – new sites without planning permission that are allocated for more than 500 dwellings** 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 9, which is due to be considered for the discussion at the Examination Hearing session on Tuesday 1<sup>st</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.

**Issue 1: Anglia Square (Ref: GNLP0506)**

1.15 Welbeck Land have no comments to make on Issue 1.

**Issue 2: Land between Fir Covert Road and Reepham Road, Taverham (Ref GNLP0337R)**

1.16 Welbeck Land have no comments to make on Issue 2.

**Issue 3: Land off Blue Boar Lane/ Salhouse Road, White House Farm, Sprowston (Ref GNLP0132)**

1.17 Welbeck Land have no comments to make on Issue 3.

#### **Issue 4: Costessey Contingency Site (Ref GNLP0581/2043)**

**Is the proposed site allocation soundly based? In particular:**

**Question 1. Is this allocation justified and is it supported by the evidence?**

- 1.18 As explained in Matter 1, the Costessey contingency site has not been assessed against reasonable alternatives on an equal basis. There has been no consideration of whether other potential contingency sites perform better in environmental terms (although the SA suggests that they do). Similarly there has been no attempt to test the policy of addressing contingency in this way against other reasonable alternatives (such as identifying a number of contingency sites, or making further allocations of sites which have been assessed to be suitable and deliverable to ensure a robust supply over the plan period).
- 1.19 There is a distinct absence of evidence to support the site at Costessey in terms of education provision, that has been supplied by the Partners to support this site as a contingency site. It is acknowledged that there is a Statement of Common Ground between the landowners and the Local Education Authority, but there is no education strategy provided to support the GNLP.
- 1.20 The question therefore remains, is the Costessey site the best location for a Sixth Form education site, or are there better alternatives? Equally, are there other settlements that would benefit from a similar education exercise being undertaken, such as Wymondham?
- 1.21 A lack of evidence / education strategy would suggest this site is not currently justified.

**Question 2. Have the environmental and other constraints to development and the implications for infrastructure been properly assessed and where necessary, can appropriate mitigation be achieved?**

- 1.22 It is not apparent that the education infrastructure has been properly considered by the GNLP.
- 1.23 Although it appears that suitable mitigation, by way of Sixth Form education provision, can be achieved for the Costessey site, this does bring into question firstly, whether the strategy for the wider school based planning area identifies a requirement for new sixth form provision at Costessey There is also a question over whether this is the only available site for Sixth Form relocation / expansion, or if there are suitable alternatives which can be accessed by active travel options that have not been assessed. This assessment does not appear to have been conducted.
- 1.24 As stated in Question 1 above, would other settlements equally benefit from a similar up-to-date education assessment, such as Wymondham?

**Question 3. Is the land required in order to deliver a safe and suitable access into the site available?**

- 1.25 Welbeck Land have no comments to make on Question 3.

**Question 4. Has the availability, viability and deliverability of the site been robustly assessed? Would the requirement to provide new educational facilities within the site affect its ability to meet other policy requirements, e.g., for affordable housing?**

- 1.26 It is unclear if work to underpin the availability, viability, and deliverability has been provided for the site at Costessey, or has been robustly assessed by the Partners.
- 1.27 From the short Statement of Common Ground between the landowners and the Local Education Authority, it is clear in this instance education provision has been discussed, and considered. Based on the proposed growth at this site it has been agreed that a suitable solution would be to provide land at nil cost or nominal value to Norfolk County Council. It is not clear if this would have any implications for the provision of other facilities, or meeting other policy requirements. Nor is it an example of an education strategy that has been properly considered and provides the appropriate solution for school provision across the GNLP.
- 1.28 In addition, nowhere in the Statement of Common Ground is it mentioned about how the relocation will be paid for, which will be a significant amount of monies for NCC to fund. (It is likely through borrowing, and it is not clear whether this approach represents value for money). There is also no mention within the GNLP0581/2043 policy requirements for contributions towards the Sixth Form college, nor other education provision (irrespective of whether this is funded by CIL).
- 1.29 On a similar basis, it can be argued that with separate discussions with NCC, the Wymondham site (GNLP0006) also solve education issues in its location, in this instance by freeing up capacity at Wymondham High School by relocating the Sixth Form to its proposed site, which appears to be the only available site within walking distance to the existing campus. It is unclear why the GNLP isn't allocating this site at Wymondham. This is presumably because of the outdated education cap previously set out in the WAAP. No doubt there will be other sites that will also have approached the Local Education Authority, and discussed similar solutions in isolation, rather than a strategic approach. These issues will need to be discussed directly with the landowners and Partners.
- 1.30 However, the underlying issue is therefore a lack of a GNLP wide education strategy.

**Question 5. Is the proposed trigger mechanism for the release of this site justified and effective?**

- 1.31 The policy wording for this contingency site to come forward states: *“The site will become an allocation if there are three consecutive years in which Annual Monitoring Reports show that 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 (for example there are infrastructure or ownership constraints or significant abnormal costs have been identified) preventing the delivery of committed and allocated housing sites.”*
- 1.32 The trigger appears to be very specific in terms of: timing; location; and figures.
- 1.33 Sites in the Greater Norwich area may well experience some difficulties in being brought forward, so it is a good idea to have a contingency site available. Why has this not been considered for elsewhere outside of the Greater Norwich area, and what is the justification for this being the only contingency site in the entire GNLP?

**Question 6. Are the other detailed requirements set out in Policy GNLP0581/2043 justified and effective?**

- 1.34 The context wording of this contingency allocation states: *“If the trigger point set out in the second paragraph of the Policy applies, the site will need to be masterplanned to provide community and recreation facilities including a local centre, a primary school and a sixth form centre. Highway improvements will be needed including improvements to the Longwater junction and New Road to ensure adequate access from the A47 and the remainder of the urban area.”*
- 1.35 This suggests no masterplan has been prepared or tested.
- 1.36 In the absence of any detailed work, it is therefore questioned how the GNLP can make an assumption that the site will be able to deliver the specified requirements, or indeed the excess of 800 homes suggested.
- 1.37 It is therefore suggested this Policy will remain unjustified and ineffective until such a plan, and viability assessment, are prepared.

**February 2022**  
**JBPL**





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