

Greater Norwich Local Plan

Written Representations on Regulation 18:
New, Revised and Small Sites Consultation

R J Baker and Son

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Notice

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1. Introduction

Our clients are the owners and promoters of 72.5 hectares of Land at Johnson's Farm, Wymondham under reference GNLP0354. They have instructed us to make representations objecting to several sites within Wymondham that are the subject of this consultation; Greater Norwich Local Plan Regulation 18: New, Revised, and Small Sites.

We have set out below our objections, including objections to individual sites contained in Appendix A. These clearly demonstrate how allocating our client's land would be more conducive to achieving the principles of sustainable development set out in the revised National Planning Policy Framework (NPPF) 2018.

A map of proposed Wymondham sites has been submitted supporting this representation demonstrating the positioning of isolated sites and those in the strategic gap. The 2011 Masterplan and revised Heritage Report accompany this representation.

2. Heritage Issues

Reference is made in the Sites Proposal Document published during the Regulation 18 Growth Options and Site Proposals Consultation in early 2018 at p.325 to our clients site (GNLP0354). This states that development of our clients' land has the potential to impact on the setting of Wymondham Abbey, an important heritage asset. On 14 August 2017, we submitted a Heritage Setting Appraisal Report which demonstrated that our client's land could be developed without causing any significant harm to the setting of Wymondham Abbey. We have updated our report to show how the development would accord with the revised National Planning Policy Framework (2018) and have submitted this report (2018) alongside this representation. It is our understanding that the Greater Norwich Development Partnership (GNDP) have not yet taken this evidence into account, and therefore we reiterate the need to do so when assessing the suitability of our client's land as a preferred site for a housing led urban extension to Wymondham.

Our analysis of evidence collected in the Heritage Setting Appraisal (2018) demonstrates that development on Johnson's Farm would not cause any significant harm to the setting of the Abbey and therefore accords with the guidance contained in the revised National Planning Policy Framework (2018). The proposed development can be planned to utilise the natural screening provided by the trees which would remain. The development would also be planned to safeguard views of the Abbey by incorporating viewing corridors towards/from the Abbey, which would be further enhanced by the provision of public open space around the Abbey which would act as a buffer between the proposed development and the Abbey.

3. Public Open Space

The provision of a new area of public open space adjacent to the Abbey and the town centre is much needed given the lack of accessible open space within Wymondham. The only other open space (WYM 14 in WAAP) is on the north eastern edge of Wymondham and has limited accessibility from the town centre and many other parts of Wymondham.

Unlike the public open space that may be provided in the garden village sites being promoted outside the town, the new public space within the development at Johnson's Farm will enhance the amenity of the Town Centre to visitors and shoppers and provide a focus for the Abbey and the new publicly accessible areas around it.

As demonstrated in the Masterplan (2011) (see supporting documentation submitted), our client's site proposes a new south-west pedestrian and cycle route allowing for better permeability and accessibility to the centre, with the aim of creating a sustainable non-car reliant settlement which increases the vitality and vibrancy of the town centre without harming the character, thus delivering much needed public benefits.

4. Location and Scale of Future Growth

The Growth Strategy, consulted on in early 2018 included a potential option for the development of a garden village to achieve the housing need set out for the Greater Norfolk area. By its own admission, the strategy states that the time required to bring new settlements forward could mean that significant amounts of housing would not be delivered before 2036. The housing target set for Wymondham during the plan period is 2,200. The sites GNLP2168 at Park Farm and GNLP0525R North Wymondham together equate to a figure of 8,000 homes if allocated at the quantum proposed without including any other proposed sites. This would far outweigh the level of local need, even if the Council decide to allocate with a buffer to support future growth beyond the plan period. This scale of development would result in a detrimental impact on the character and setting of Wymondham as it would result in a doubling in the size of the settlement, all of which would be located a significant distance from the town centre.

If the Council wishes to pursue a higher growth level, it is of utmost importance to ensure sites are allocated close to Wymondham town centre in sustainable locations to maintain and grow functional social links and patterns of usage. We therefore urge the GNLP not to allocate such large quantities of new housing as single developments as is proposed on sites GNLP2168 Park Farm and GNLP0525R North Wymondham.

The cost of new and additional preliminary infrastructure needed to deliver this scale of development on greenfield sites is likely to require significant public investment and will result in reduced development viability, impacting on the achievement of policy compliant levels of affordable housing. The alternative of allocating smaller sites such as our clients' land (proposed for 1,200 units comprising 400 homes in Stage 1 and 800 in Stage 2) to the south of Wymondham, which are sustainable, achievable and deliverable in the timeframe of the Local Plan, would not require the scale of new transport and utilities infrastructure needed for a new settlement or garden village.

There are several sites being promoted that would rely on some form of new access being created onto the A11. We do not believe this to be suitable and there is concern these developments would negatively impact upon existing traffic flows around Wymondham. All sites located east/south of the A11 either must be served off this road directly or rely on the use of smaller local roads that pass under A11, which would create a bottleneck. Although there may be a possible workable solution to gain access to the sites in this area, the level of housing promoted at site GNLP2168 alone (6,500) would be far too high for the type of accesses proposed. Any solution to this issue may impact upon through traffic flows on the A11, which has not been addressed by the promoted developments. We urge the Council to consider this thoroughly, alongside detailed discussions with Highways England, before considering any further the allocation of land east of the A11.

The sites that would need to be served off the A11, which we deem to be inappropriate are:

- GNLP2168 Park Farm
- GNLP2169 within WYM3 and WYM13 allocation
- GNLP0515 Land at south Wymondham – north and south of the A11 and west of Park Lane
- GNLP0402 Land to the north east of Silfield Road, and south of the A11
- GNLP0403 Land to the south-west of Silfield Road, and south of the A11
- GNLP0200 Silfield pitch and putt, The Street

5. Strategic Gap

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted 2014) sets out under paragraph 2.17 that “concentrating all growth on the A11 corridor would result in the excessive expansion of Wymondham and Hethersett, altering not only the character of the settlements themselves but also eroding the degree of separation between the settlements and Norwich”. Policy 10 of the JCS seeks to maintain the strategic gap to the north and north-east of the settlement of Wymondham.

It is evident from the Greater Norwich Local Plan Regulation 18 Consultation accompanying plan that several existing commitments have already been granted permission encroaching on the strategic gap between Wymondham and Hethersett, contrary to Policy 10. We urge the Council to carefully consider the allocation of sites which will further erode this gap when selecting preferred options for housing development. We therefore object to the allocation of land for development that would impact upon the strategic gap and urge the GNLP to allocate land in a more sustainable location to the west of Wymondham as we have set out above.

The sites which will affect the strategic gap are:

- GNLP052R North Wymondham
- GNLP2125 South of Norwich Common
- GNLP2150 North east of Carpenter’s Barn
- GNLP0394 Land at New Road Hethersett
- GNLP0092 Land south of B1172 Norwich Common

6. Deliverability of Land at Johnson’s Farm

An illustrative Masterplan was prepared for the site in 2011 and shows how the site can be developed as a sustainable extension to Wymondham, at a scale that is appropriate to the existing size of the town. The committed development at ref GNLP0032 Land to the West of Silfield Road adjoins our client’s land, and we have made previous representations through the Local Plan process and planning application stage to ensure that the development of that site will complement and not impact on the potential future development of our clients’ land. This committed development makes provision for the necessary access routes into our clients’ site. This demonstrates that the infrastructure is already in place, unlike several of the other sites being promoted through this consultation. It therefore makes more strategic sense to allocate land here, as this will provide for a more comprehensive and appropriate urban extension with excellent links for pedestrians and non-motorised vehicle users to access Wymondham’s town centre for local employment and facilities.

7. Summary

In summary, it is evident from the information set out above and in Appendix A that our client’s site is in a much more sustainable location which will meet both the principles set out in national

planning policy, and those of the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk for the following reasons

- Our client's site lies close to the town centre and railway station, which means that our client's site is extremely well-connected without reliance on motor vehicles.
- The site is in close proximity to land allocated for Employment (WYM 6), making it an extremely sustainable and accessible site for expansion.
- Furthermore, our client's site will provide accessible green open space around the Abbey (See masterplan) which was not previously open to the public. The only other open space (WYM 14 in WAAP) is on the north eastern edge of Wymondham which is relatively inaccessible, therefore, making our clients' land extremely well located for open green space and an urban extension in this area.
- As demonstrated above, it has clear advantages over other proposed sites in more isolated locations and those to the north of Wymondham infringing on the strategic gap between Wymondham and Hethersett.
- The Heritage Report clearly demonstrates that our client's site can be developed without significant harm to the setting of Wymondham Abbey; this being the apparent only concern of the GNDP when considering our client's land for allocation for development. The inclusion of open space within the site will complement the setting of the Abbey and will be available for leisure use, providing much needed facilities close to the town centre.
- Given the achievability of the site through existing and planned infrastructure, our clients' site could be delivered within 3 to 5 years of allocation. This is a far more realistic opportunity than the larger scale sites such as GNLP2168 and GNLP0525R; and
- The more isolated sites and the larger sites will require the provision of significant infrastructure which will affect the viability of those sites and the affordable housing which can be delivered. The larger sites would inevitably be released over a longer phased timeframe, slowing the delivery of the local housing need required within the plan period.

Appendix A. Objections to Individual Proposed sites

Site reference and Name	Comment
GNLP0525R North Wymondham (including GNLP2125 South of Norwich Common and GNLP2150 North east of Carpenter's Barn)	<p>This site would contribute considerably to the closing of the protected strategic gap between Wymondham and Hethersett. This is contrary to Policy 10 of the Joint Core Strategy, and would detrimentally impact the character of each settlement, which this policy seeks to safeguard. A large volume of development in this area will tip the balance of the settlement of Wymondham with a greater portion of development being further away from the town centre, public transport links, and local facilities.</p> <p>The portion of the site to the north east, if allocated alone, would be considerably isolated and far from the centre of Wymondham.</p> <p>Such a large development would require the delivery of strategic scale infrastructure, amongst which are highway improvements, management of surface water, There is also the potential need for sewerage infrastructure improvements and new sewerage capacity. There is no evidence to show whether this works has been agreed and if its delivery can be funded without adversely affecting both the viability and deliverability of the development. I.</p> <p>There are veteran trees within and along the boundary of GNLP2150, and areas mainly along the boundary being at surface water flood risk.</p>
GNLP2155 West of Carpenter Close	<p>Our primary concern is that allocating this site will encroach upon the strategic gap to the north of Wymondham, particularly when also considering the existing commitments in this location.</p> <p>Considered on its own, this site would also serve to be very isolated from the main settlement, and hence require the provision of further infrastructure, and promote a potential dependency on private motor vehicles to access local facilities.</p>
GNLP2090 East of Field House	<p>The site is contiguous to GNLP0402 Land to the north east of Silfield Road, and south of the A11, and currently in agricultural use Although, approximately 50 residential dwellings are proposed, this does not take into consideration of the need to provide green spaces. This will require land to be taken from the gross development area of residential land thus the residual quantum of housing will be less than that identified.</p>
GNLP2157 Great Expectations	<p>This site to the south of Wymondham is extremely isolated with no public transport provision and would not achieve the principles of sustainable development set out in national planning policy, due to its sole reliance on private vehicles.</p> <p>The site contains some surface water flood risk in parts of the site which would require the sequential test to be applied and a veteran tree at the site's boundary. Sewerage infrastructure upgrades would likely be required as not readily available on site.</p>
GNLP2168 Park Farm	<p>The site is not an appropriate location for a sustainable urban extension, given the distance to the town centre, transport links, and local facilities.</p> <p>We do not consider that there is adequate viability and feasibility evidence to show that is the most appropriate approach for development around Wymondham, given also that the delivery of 6,500 homes here would require significant infrastructure</p>

	<p>provision and upgrades. The access being suggested would not be able to serve the quantum of development being promoted for this site.</p> <p>A large volume of development in this area will tip the balance of the settlement of Wymondham with a greater portion of development being further away from the town centre, public transport links, and local facilities.</p> <p>Development on the scale proposed far exceeds that required for Wymondham, and therefore we believe it to be more appropriate to allocate smaller sites such as our clients land (GNLP0354) which have more certainty over achievability to deliver development that is far better connected to the town centre and local facilities, and can complement the character of the existing settlement without swamping it with over development.</p> <p>Inevitably there would also be detrimental impacts to Peaseacre Wood and the Moat which is contrary to JCS Spatial Planning Objective 9.</p> <p>Parts of the site are Grade 2 agricultural land</p> <p>There are some areas of ancient woodland and there are veteran trees at the site's boundary.</p> <p>The moat is a scheduled Ancient Monument which would also be impacted by development of this site and there is no information to show it and how this will be addressed</p>
<p>GNLP2169 Silfield</p>	<p>There is a concern of potential highways capacity at the bottleneck under the railway line which could constrain development to the south of the town. Certain physical barriers and roads have naturally contained the town. Consequently, part of this site extends beyond Milton Road, which as well as being further away from the station thus more vehicular dependency, it also results in suburban sprawl, which should otherwise be contained in a sustainable manner.</p>
<p>GNLP0006 Land North of Tuttles Lane</p>	<p>This site lies too far out of Wymondham to be considered appropriate to serve the local housing need and would indeed not be conducive to the principles of sustainable development. The site is the wrong end of the settlement for the recipients of any new development to enjoy connectivity to local facilities, the town centre, designated open space, or public transport networks.</p>
<p>GNLP 1055 East Estate Stanfield Road</p>	<p>This site lies too far out of Wymondham to be considered appropriate to serve the local housing need and would indeed not be conducive to the principles of sustainable development. It would be difficult to create a community without any links to Wymondham. Therefore, creating a community here would not be appropriate. It would impact on the scale and character of the existing settlement, and surrounding landscape.</p>
<p>GNLP0402 Land to the north east of Silfield Road, and south of the A11</p>	<p>This site has poor road access and would rely on access being created from the A11. It is therefore not suitable to support a development on the scale proposed at 800 homes.</p>

<p>GNL0403</p> <p>Land to the south west of Silfield Road, and south of the A11</p>	<p>This site has poor road access and would rely on access being created from the A11. We therefore have concerns over the traffic impacts this would generate on Wymondham.</p> <p>Development of this site would have negative impacts on the character and setting of the adjacent Conservation Area located the other side of the A11.</p>
<p>GNL0515</p> <p>Land at south Wymondham - north and south of A11 and west of Park Lane</p>	<p>The site is not an appropriate location for a sustainable urban extension, given the distance to the town centre, transport links, and local facilities. It would need to come forward as part of a wider allocation with adjacent sites to make this location better connected.</p> <p>This site is not suitable for development, especially the 1,500 being promoted due to lack of accessibility and infrastructure. There is no access onto the A11, which would be required to make this site accessible.</p>
<p>GNL0200</p> <p>Silfield Pitch and Putt, The Street</p>	<p>This site is a considerable distance from Wymondham town centre, transport links and local facilities.</p> <p>It has difficult access due to its location and would require considerable infrastructure and highways upgrades to become accessible.</p>
<p>GNL0285</p> <p>Land North of Carpenters Barn, off Melton Road</p>	<p>This site is proposed for recreational development to support proposed residential development at site GNL0200. We do not believe this to be suitable due to the location being a considerable distance from Wymondham town centre, transport links and local facilities.</p>
<p>GNL0327</p> <p>Land south of Gunville Hall and West of Sutton Lane</p>	<p>We believe this site is not suitable for residential development due to being located a considerable distance from Wymondham town centre, transport links and local facilities.</p>

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