

**Greater Norwich**  
**Draft Local Plan**  
**Land at Norwich Common, Wymondham**  
**Gladman Representations**



**March 2020**

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Appendix 1: Land at Norwich Common, Wymondham Vision Document

Appendix 2: Wymondham-Hethersett Strategic Gap Assessment

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# 1 INTRODUCTION

- 1.1.1 This representation provides Gladman's comments made in relation to Wymondham in response to the current consultation on the Draft version of the Greater Norwich Local Plan (the GNLP). This document should be read alongside representations submitted under separate cover by Gladman and responds to the Draft version of the GNLP as whole and does not repeat broader comments made in relation to the proposed strategic approach to development at a plan wide level.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure and is promoting Land off Norwich Common, Wymondham (the Site) for residential development through the Local Plan process. In parallel, this Site is subject to a pending outline planning application for up to 630 dwellings which is submitted with an Environmental Statement (see South Norfolk District Council reference: 2019/0780) and provides detailed evidence of the suitability and deliverability of this Site for residential development. A vision document showing how the Site could be developed is submitted in Appendix 1 to this representation.

## 2 STRATEGIC POLICIES

### 2.1 Policy 1: Settlement Hierarchy and Spatial Distribution (Question 13)

- 2.1.1 Gladman is supportive of the identification of Wymondham as a Main Town within the settlement hierarchy. Wymondham is home to a diverse range of services and facilities inclusive of primary school and secondary school provision, food store, doctor's surgery, pharmacy, and community centre. The town benefits from rail connections to Norwich and Cambridge, and from high quality bus links to Norwich. As such, the settlement forms a sustainable and logical location for new development.
- 2.1.2 It is noted by Gladman that Option 3 (supporting the Cambridge to Norwich Tech Corridor) has been selected by the Councils as the basis for the spatial strategy of the Local Plan. This corridor holds significant potential for economic growth over the plan period and will hold a key role in securing the economic ambitions of the emerging Plan, particularly in delivering identified job targets. The concentration of housing in this corridor will help secure a sustainable distribution of development over the plan period and support economic growth.
- 2.1.3 The location of Wymondham in the heart of this strategic corridor means that the town will and should play an important role in fulfilling this economic potential over the plan period with further employment and housing land required. Wymondham therefore forms one of the most appropriate location within the plan area at which to concentrate development over the plan period (inclusive of the proposed contingency). The Plan's proposed approach in this regard is therefore justified.

### 2.2 Policy 3: Environmental Protection and Enhancement (Question 21)

- 2.2.1 Gladman has some concern with the proposed approach taken by Policy 3 towards development proposals within Green Infrastructure Corridors illustrated in Map 8 of the draft Plan. Map 8 represents a broad brushed high-level assessment of Green Infrastructure across the County with limited regard to more detailed site data and functionality. For example, Gladman's land interest at Norwich Common, Wymondham is shown to be partially included within the Green Infrastructure corridor aligning to the A11, despite the Site showing limited evidence of ecological value as shown by technical reports produced as part of the current planning application.
- 2.2.2 Taking this into account, it is unclear on what basis Policy 3 seeks to protect the Green Infrastructure Corridors identified in Map 8 given that in some cases evidence of these corridors on the ground is limited, with areas within these which important to ecological conservation subject to protection through formal designation.
- 2.2.3 Gladman consider that the focus of Policy 3 in relation to Green Infrastructure should be to secure environmental benefits at the planning application stage which are important to the enhancement

of the quality and extent of Green Infrastructure corridors. This is in the aim of securing the functionality and extent of the Green Infrastructure corridors shown on Map 8 in the longer term. In this sense, contributions towards Green Infrastructure corridors made by development proposals in the area should be considered a planning benefit.

- 2.2.4 Should wording on protection of Green Infrastructure corridors be retained in the policy, Gladman consider that further evidence is needed to set out what elements of the Green Infrastructure corridors need to be protected and for what reason. The meaning of “effective management of development in accordance with the policies of the development plan” in terms of impacts for planning applications and decision making should also be clarified. Gladman would be resistant to a policy approach which would refuse development affecting a Green Infrastructure corridor where evidence shows limited environmental site value and/or the proposed development could lead to enhancements to the integrity and value of Green Infrastructure.

## **2.3 Policy 7.2 Main Towns**

### Allocations at Wymondham

- 2.3.1 Gladman welcome proposals made under Policy 7.2 for further growth to be allocated at Wymondham in addition to existing commitments. It is however considered that the 100 dwellings planned for through the Draft GNLP at Wymondham is not enough to meet housing and employment needs (see main representations) and does not provide sufficient flexibility within the housing land supply to ensure the deliverability of planned requirements. The level of new growth to be directed to the settlement should be substantially increased.
- 2.3.2 In Wymondham, committed development accounts for 96% of the total growth requirements of the Local Plan over the period 2018-2038. The emerging GNLP therefore does very little to influence the strategy of the town, with policies to have limited effect in directing where, how and in what form development takes place in the town.
- 2.3.3 The effects of this are twofold. Firstly, growth in the town will not respond to the latest evidence base of need. For example, as drafted, the Plan will fail to respond to the housing needs of the elderly with no allocations for elderly accommodation, and little scope provided for elderly appropriate accommodation through the 100 dwellings allocated in Wymondham through the draft GNLP. Secondly, the GNLP does nothing to respond to the town’s location within the A11 tech corridor, and therefore fails to make the most of this opportunity, rendering it ineffective in this regard, and potentially harming the achievement of planned economic growth in the wider plan area.
- 2.3.4 Gladman notes the proposal to identify 1,000 dwellings worth of contingency in Wymondham to respond to unmet housing need. Noting the size of the Wymondham, its sustainability, and location as part of the Tech Corridor, Gladman consider that Wymondham forms one of the most

appropriate locations within the plan area at which to address any housing shortfall and/or provide additional flexibility to respond to plan targets.

- 2.3.5 It is however considered that this additional growth should be planned for now, in the form further housing allocations in the Plan, rather than offset to a later date. Such an approach would increase the flexibility of housing land supply provided within the GNLP and heighten its durability against unpredicted changes which might occur over the plan period. Allocating land for a further 1,000 dwellings in the Plan would also address comments made above regarding the effectiveness of the GNLP in addressing the needs of Wymondham itself, as well as broader housing need. The plan making process provides a good opportunity for the infrastructure requirements of Wymondham and any future development to be understood with a solution planned for. Planning for this upfront would reduce any delay in meeting housing needs, which may not be possible through the planning application process.

#### Strategic Gaps

- 2.3.6 Gladman consider that strategic gaps should be reviewed and revised through the plan making process of the Greater Norwich Plan. As currently defined, the extent of the strategic gaps potentially forms an unnecessary constraint to development within the plan area, preventing the development of otherwise sustainable sites for development through the GNLP. Since defined and last reviewed the context for each strategic gap is likely to have altered considering more recent development changing the nature of the strategic gap and changing the need to retain land within this designation to fulfil its purpose.
- 2.3.7 Evidence of this is clear in the case of the strategic gap currently defined between Wymondham and Hethersett. In recent years the character of land at the north eastern edge of Wymondham along Norwich Common has significantly altered with new housing and employment development along the north of this road which has served to urbanise this area.
- 2.3.8 In response to this, Gladman commissioned FPCR to undertake an assessment of the Strategic Gap to consider how land included within this designation functions as an important part of the identified gap. This evidence (provided in Appendix 2) concludes:
- The gateway into Wymondham from the East is formed by Elm Farm Business Park. This is the most eastern extent of Wymondham;
  - The B1172 (Norwich Common) represents the only visual receptor for the gap, given general absence of public footpaths and obscured views on the A11;
  - Inter-visibility along the B1172 is however limited given intervening vegetation and built development;
  - The settlement pattern in Wymondham has recently altered from a nucleated settlement following recent development in the north east of the town; and

- There is a limited degree of openness within the strategic gap between Wymondham and Hethersett owing to existing intervening vegetation and built development.

2.3.9 Taking the above into account FPCR conclude that by maintaining the current minimum width of the Strategic Gap it is unlikely that further development will compromise inter-visibility, physical separation or perceived openness, with opportunities available to mitigate adverse effects on openness.

2.3.10 On account of this evidence, Gladman believe there is clear justification to revise the extent of the Strategic Gap defined at the edge of Wyondham to exclude land south of Norwich Common from within the gap to provide a new boundary defined at the entrance of the town provided at Elm Farm Business Park. Further commentary is provided within section 3 of this representation about how the land being promoted by Gladman at Norwich Common, Wymondham could be developed whilst safeguarding the integrity of the wider strategic gap.

### 3 LAND AT NORWICH COMMON, WYMONDHAM

#### 3.1 Introduction

3.1.1 Gladman is promoting Land at Norwich Common, Wymondham for residential development through the Greater Norwich Local Plan. The Site has a capacity for around 630 dwellings and extends to 39.59ha in area. Figure 1 below shows the extent of the land being promoted by Gladman through this process.

Figure 1: Land at Norwich Common, Wymondham



3.1.2 It is noted that through the supporting evidence to the draft Plan, Land at Norwich Common has been considered and appraised by the authorities on the basis of a wider area depicted as part of site reference GNL0525R. Gladman can confirm that there is no connection between this wider land and the land promoted by Gladman as shown above in figure 1. Gladman's view is that the area being promoted in figure 1 on its own represents a sustainable location for housing at which future development needs of Wymondham could be met. The development of Land at Norwich Common, Wymondham is not in anyway reliant on this wider land to come forward for development.

3.1.3 A vision document prepared to illustrate how the Site may come forward for development is submitted in Appendix 1 to this representation. The vision document confirms to a high level the constraints and opportunities and outlines the benefits which the development may bring to the local area and wider plan area.



### **3.2 Availability**

- 3.2.1 Gladman can confirm the availability of Land at Norwich Common, Wymondham for development now. Gladman is engaged in a promotional agreement with all required landowners to deliver the Site, and as such can confirm that all landowners support the development of the Site. The Site is not subject to any tenancies or covenants which would delay or prevent the development of the Site. The Site is not known to be affected by ransom strips.
- 3.2.2 Gladman is committed to bringing the Site forward for development, as confirmed by the submission of an outline planning application for up to 630 dwellings in March 2019 which remains pending determination.

### **3.3 Achievability/Suitability**

- 3.3.1 The submitted planning application confirms the achievability/suitability of the Site for residential development. The application includes a comprehensive suite of recent technical evidence base prepared to support the submission of an environmental statement. This evidence confirms that development of the Site would not result in adverse effects on ecology, heritage, flood risk/drainage, air quality, and noise. The proposed layout for the site provides for safe and sufficient access into the Site. Gladman is engaged in ongoing discussions with the County Council and Highways England about effects of the development on the wider highway network in the context of this planning application.
- 3.3.2 As alluded earlier in this representation, it is Gladman's view that the development of Land at Norwich Common, Wymondham would not adversely affect the strategic gap currently defined between Wymondham and Hethersett. Opportunity exists within the red-line boundary of the Site for the developed edge to be softened to minimise any potential for harm to the functionality of the Strategic Gap and its perceived openness.

### **3.4 Deliverability**

- 3.4.1 As set out above, the Site is immediately available for development and could, if allocated and approved for development, make a small contribution towards the five-year housing land supply of the joint plan area. Gladman's intention, with the agreement of officers, is for the current application submitted and pending determination with South Norfolk District Council, to remain undermined until the appropriate stage of the plan making process of the GNLP is reached. This approach would minimise the potential for any later delay in bringing the Site forward for development and could mean that development starts on site within two-years of adopting the GNLP.
- 3.4.2 The scale of the Site and opportunity for multiple access points means that the development could be developed by multiple outlets increasing the annual delivery rate which may be anticipated at the Site. Assuming adoption of the GNLP in mid-2022 and outline planning consent soon after, it is envisaged that development could commence in 2024 with first completions likely in late

2024/early 2025. Following this it is anticipated that 70 dwellings per year could be delivered at the Site excluding proposed C2 apartments. At this rate the development would be completed by 2034 and as such would be developed in full within the plan period.

3.4.3 Gladman is the UK's largest land promotor, and has, since 2009, secured planning consents for over 26,000 dwellings. On average it takes 17 months from planning permission being secured to development commencing on sites which Gladman gain consents on. Gladman market sites to and work with all national and major regional housebuilders, enabling best value to be achieved on sites, and to ensure that outline planning consents achieved are compatible with future reserved matters applications.

### **3.5 Benefits**

3.5.1 If allocated, the development of Land at Norwich Common, Wymondham would deliver significant benefits to the local area and wider community, this includes:

- The development of up to 630 dwellings, providing for a wide range of tenure, size and types of new homes;
- The delivery of 208 affordable homes;
- Land sufficient to accommodate a new two form entry primary school;
- C2 apartments responding to the housing needs of the elderly, ensuring that the Local Plan effectively responds to this source of housing need;
- A new local centre with opportunity for retail space and a community hub for new and existing residents;
- Child play provision inclusive of a NEAP;
- A Community Park representing a major benefit from the community, environmental net gain and huge contribution to the Councils Green Infrastructure Agenda;
- The opportunity to enhance the gateway into Wymondham; and
- Pedestrian and cycling links/improvements.

3.5.2 On a national level, Gladman typically achieves planning contributions of £12,000 per plot, and an average of 33% of all dwellings have been developed as affordable housing. A summary of the community benefits secured on a national basis on sites promoted by Gladman is provided in the accompanying Vision Document submitted as Appendix 1 to this representation.

## 4 CONCLUSIONS

- 4.1.1 This representation has been prepared by Gladman, in response to policies outlined within the draft Greater Norwich Local Plan in relation to Wymondham. More general comments relating to the wider draft GNLP are submitted under separate cover.
- 4.1.2 Gladman is promoting land at Norwich Common, Wymondham for development through the GNLP plan making process for residential development. A vision document is submitted in Appendix 1 to show how the site might come forward taking into account constraints and opportunities. The Site is subject to a current planning application for up to 630 dwellings.
- 4.1.3 Gladman supports the identification of Wymondham as a Main Town and the application of Option 3 for the basis of the spatial strategy. Gladman however do not consider that the proposed approach for Wymondham, which sees only a further 100 dwellings allocated through the GNLP, to sufficiently respond to the needs and opportunities of the town or provide an effective strategy for the wider plan. The proposed contingency for Wymondham, whilst welcome, should be made in the form of further allocations. The extent of the current Strategic Gap between Wymondham and Hethersett should be reviewed with Land South of Norwich Common removed from this designation.
- 4.1.4 Gladman consider that Land South of Norwich Common, Wymondham represents a deliverable and sustainable opportunity for housing land over the coming plan period. The Site holds a capacity for up to 630 dwellings and could contribute to housing land supply needs across the duration of the plan period. Extensive evidence illustrating the suitability of the Site as a location for development is available within the submitted outline planning application which is pending determination by South Norfolk District Council (see application reference 2019/0780). A Vision Document showing how the site might be developed is submitted in Appendix 1.
- 4.1.5 Gladman can confirm that there are no known barriers to developing the Site for housing. Gladman is promoting all land required to develop the Site. The landowners are supportive of its development. Gladman is the UK's largest strategic land promotor and since 2009 has secured planning consent for over 26,000 dwellings. Gladman deliver policy compliant schemes, with planning contributions average £12,000 per plot nationally. Typically, it takes 17 months from the grant of planning consent to commencement on sites which Gladman have gained consent on.

## **Appendix 1**

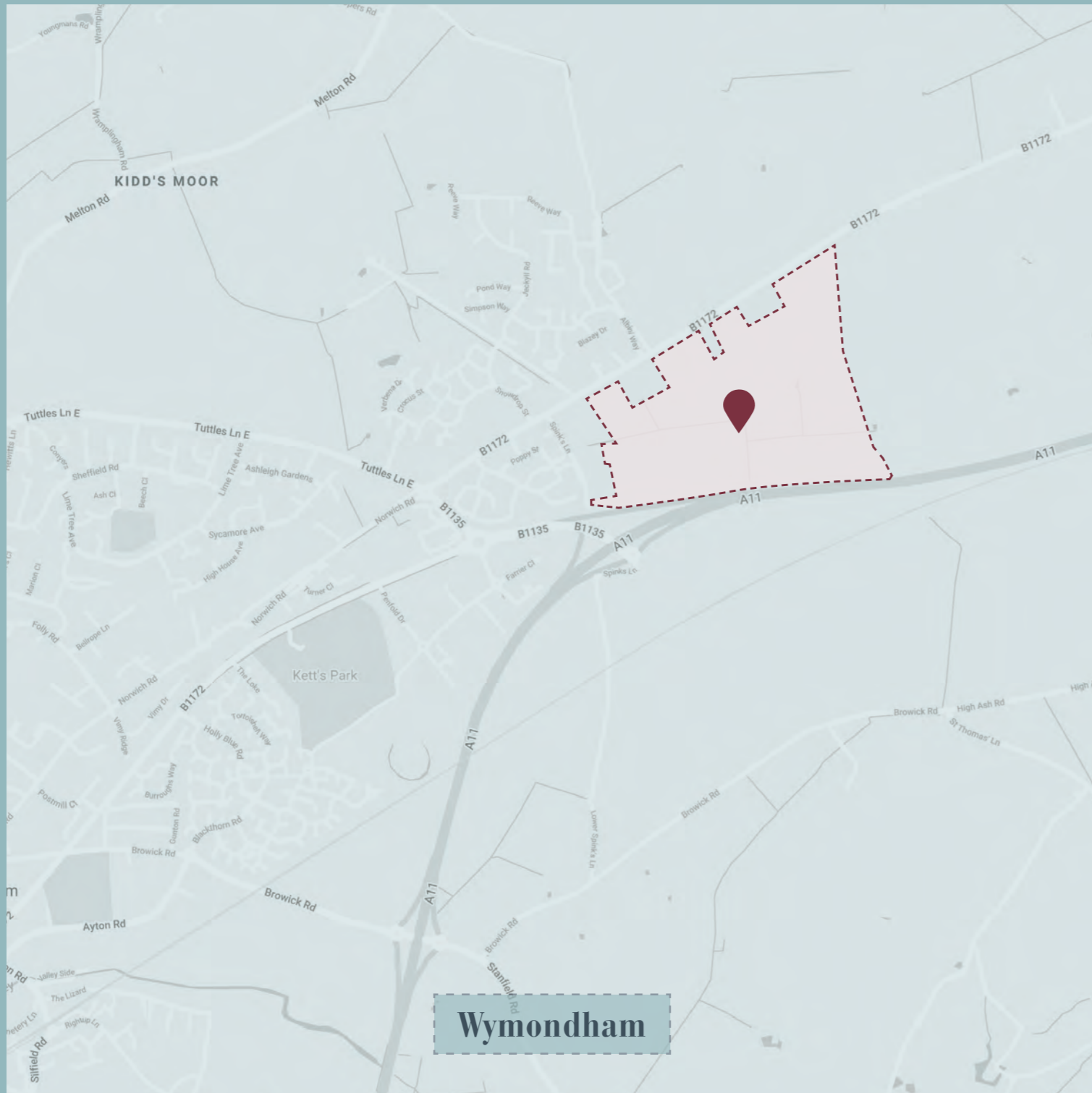
### **Land off Norwich Common, Wymondham Vision Document**

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# The Vision for land off Norwich Common, Wymondham

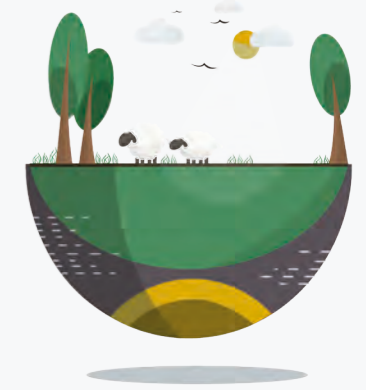
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# Introduction

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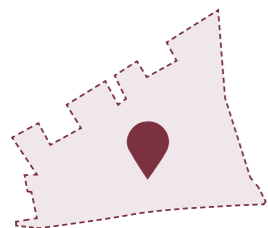
Gladman Land is a privately funded, family run business with over 30 years' experience in the land and development industry. From our beginnings in housebuilding, through to commercial and industrial properties, we have a solid history of delivering sites quickly.

## HOW WE ENSURE A SITE IS VIABLE AND DELIVERABLE

We enter into transparent Promotion Agreements with landowners rather than the more complex Option Agreements and thoroughly review a site's viability before an Agreement is entered with a landowner. This ensures that the proposals can provide the full policy compliant affordable housing requirement and CIL compliant planning obligations when an application is submitted. On average, Gladman provide circa £12,000 per housing plot on schemes throughout the UK.

Our initial viability work and detailed due diligence ensure that proposals are deliverable without delay. Once outline planning consent is achieved, a development will normally commence within 18-24 months. In many cases a planning condition can be attached reflecting this timescale to give the Council certainty on delivery.

Once planning consent is achieved, we sell the site to a housebuilder. Having sold sites to all the major Plc house builders as well as to a huge range of small to medium sized housebuilders and Registered Providers over the past few years, we ensure that that the outline planning application documents are compatible with future reserved matter applications.



# The Site

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Gladman is working with the landowners of Land off Norwich Common to promote their site for development. The 39.59-hectare site presents an ideal opportunity to deliver a high quality, sustainable mixed-use development to address Greater Norwich's future housing, education and recreation needs.

An outline application for the Site was submitted to South Norfolk District Council for the development of up to 630 new homes, apartments with care, a new local centre and land for a new primary school in March 2019. This Vision Document summarises the technical and environmental work which has already been completed for the Site which demonstrate the deliverability of the land, and its ability to make a timely contribution to the Greater Norwich future housing requirements.



# A Sustainable Site and Settlement

Land off Norwich Common in Wymondham is well positioned, within an established and thriving town, to accommodate further residential development to contribute to Greater Norwich's future housing needs.

With a population of approximately 14,405 residents (2011 census), Wymondham is designated as a Main Town in the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk. Wymondham benefits from a good range of services and facilities that would be accessible for future residents of this site by walking and cycling, as well as a broad choice of shopping, leisure and employment opportunities. The site could accommodate land for a new primary school and a local centre which would be a significant benefit to both new, as well as existing, residents within the vicinity.

Land off Norwich Common also benefits from good public transport links to wider destinations including Norwich and Cambridge. The nearest bus stops are situated within 400m walking distance of the site and are served by eight services, together these services provide circa 5-6 buses per hour in each direction between Wymondham Town Centre and Norwich City Centre.

The nearest train station is approximately 3.5km from the Site at Wymondham Railway Station and provides frequent services to destinations including Norwich and Cambridge.



## Key

Social Club	Supermarket (Lidl)	Wymondham Garden Centre	North Wymondham Community Centre	Wymondham Leisure Centre	Browick Road Primary School	Railway Station
Medical Centre	Ketts Park Community Centre	Ashleigh Primary School and Nursery	Shop (Co-Op)	Wymondham High School	High Street	Supermarket (Morrisons)
Pharmacy	Wymondham Garden Centre	Robert Kett Public House	Wymondham Medical Centre	Wymondham Library	Windmill Surgery	Robert Kett Primary School