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Greater Norwich Local Plan EIP Hearing Statement

Matter 3 Issue 1

Iceni Projects Limited on behalf of
Fuel Properties Ltd

January 2022

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ON BEHALF OF FUEL
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1. INTRODUCTION

- 1.1 This Hearing Statement is made on behalf of Fuel Properties (Norwich) Ltd (herein referred to as Fuel within this representation). Fuel is developing the Carrow Works site, which is an immediately available 20Ha brownfield site that lies within the East Norwich Strategic Regeneration Area.
- 1.2 Carrow Works was previously in industrial use for food production and distribution, and is now largely vacant aside from one of the industrial buildings being used for the manufacture of modular homes for off-site transportation and assembly.
- 1.3 The site is awaiting comprehensive redevelopment and in this regard, it has been proposed for mixed-use residential-led redevelopment in the Council's Regulation 19 Local Plan. The site is an important component of the wider East Norwich Strategic Regeneration Area, which has been allocated for circa 4,000 new homes and 6,000 new jobs under Policy 7.1 of the draft Plan. Policy 7.1 outlines criteria that serve as terms of reference for an East Norwich Masterplan, which is intended to be enshrined into policy through a Supplementary Planning Document later in 2022.
- 1.4 In addition to the identification of the East Norwich Strategic Regeneration Area under Policy 7.1, the draft Plan specifically allocates Carrow Works as an allocation site for residential-led mixed-use redevelopment under Policy/Allocation Ref: GNLP0360/3053/R10.
- 1.5 Whilst the allocation provides a suite of key site criteria, there are also a set of criteria within Policy 7.1 that serve as a terms of reference for the East Norwich Masterplan that is currently being produced, which is expected to be enshrined into policy in the form of a Supplementary Planning Document. This process is due to run through 2022, with the SPD programmed for adoption later in 2022 in tandem with adoption of the Local Plan.
- 1.6 It is Fuel's intention to prepare a corresponding hybrid planning application for the Carrow Works site in 2022 and it is envisaged that the pre-application work will take place in tandem with Stage 2 work formulating the East Norwich Masterplan over the coming months, so that the two processes mutually inform one another.
- 1.7 Carrow Works includes buildings, structures and various areas of the site of heritage value to Norwich, including the Carrow Abbey. Accordingly, heritage issues lie at the forefront of the pre-application process and are similarly of critical importance to the ongoing Masterplan development.
- 1.8 The heritage assets are constraints to development, in so far as they reduce the scope for change in some areas of the site, they generate significant unavoidable abnormal costs to the development project and add a greater level of complexity to a multi-phase strategic development site that will

need to be delivered across the plan period. Conversely however, the heritage assets ensure that the site will have its own unique identity and offer opportunities for high quality placemaking that can enhance the quality of urban regeneration that could otherwise not be achieved.

1.9 Fuel is looking forward to continuing to work with a suite of local, technical and statutory stakeholders to unlock the Carrow Works site and the wider East Norwich Strategic Development Area throughout 2022 and beyond.

2. MATTER 3 STRATEGY FOR THE AREAS OF GROWTH, ISSUE 1 THE NORWICH URBAN AREA INCLUDING THE FRINGE PARISHES

Question 1: Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?

- 2.1 Fuel is supportive of the strategy for the East Norwich Strategic Regeneration Area as set out in Policy 7.1. In this regard, the rationale for the regeneration area and the key development principles and considered to be wholly consistent with the vision, objectives and spatial strategy set out in the Local Plan, as well as the objectives and principles set out in national planning policy.
- 2.2 It is evident from the growth strategy set out at Paragraph 188 of the Plan that maximising brownfield development and regeneration opportunities, with just 22% of the envisaged growth within the plan period expected to be delivered on previously developed land. The East Norwich Strategic Regeneration Area constitutes the largest brownfield land opportunity in the East of England and it has the potential to deliver a development that aligns well with the aspirations for development set out in Sections 3 and 4 of the Plan.
- 2.3 Fuel's specific site, Carrow Works (policy GNLP0360/3053/R10), is arguably the most sustainable and deliverable site within the East Norwich Regeneration Area and is expected to be brought forward in advance of the other sites. It provides an opportunity to deliver a form of development that maximises the potential for sustainable living and working patterns. The site is strategically important in terms of public accessibility and connectivity, as holistic redevelopment will enable a public pedestrian/cycle route to be established between the city centre and the Broads to the east, through the provision of an east-west route through the northern part of the site.
- 2.4 The scale of the site and Fuel's development strategy for it will enable multiple residential developers to simultaneously deliver different housing products on the site to boost housing delivery, with the site expected to accommodate significant amounts of conventional apartments, private rented sector housing, affordable housing, family housing and student accommodation. It is also hoped and expected that the site's unique placemaking potential and characteristics broaden the market attractiveness of the residential areas to be created.
- 2.5 The emerging proposals will seek to utilise as much as the existing infrastructure on the site as possible. In this regard, the large existing road access onto the Bracondale/A147 roundabout can serve as the principal access for the site, including during the construction period. It is also envisaged that the significant amounts of demolition that will be required will enable material to be processed

and recycled on site to reduce HGV construction traffic and make the best possible use of the existing material, either for development or structured landscaping.

- 2.6 The possibility of barriers and challenges towards the delivery of the scheme are anticipated. However, all parties involved are willing to work proactively to deliver this regeneration scheme, whilst ensuring that it remains in line with policy that has been set out in the local plan.

Question 2: Does Policy 7.1 support the city centre's role as a key driver of the Greater Norwich economy and is it consistent with national policies for ensuring the vitality of town centres?

- 2.7 The strategy of the plan maximises opportunities for inward investment, to unlock growth and to achieve sustainable redevelopment of the city centre. As such, we support Policy 7.1 and its consistency with national policy objective that vitality of town centres is ensured (Chapter 7).

Question 3: Do the sites listed in the East Norwich section of Policy 7.1 on page 106 of the Plan, form part of the East Norwich Strategic Regeneration Area as defined on the proposals map, other allocations on the proposals map, or potential sites for future development? For example is 'Land East of Norwich City FC' site reference CC16 in the Plan?

- 2.8 The brownfield sites listed on page 106 are viewed as logical sites which could come forward in the future and should be prioritised to ensure that greenfield land is not needlessly developed. Though these sites are not specifically part of the east Norwich Master Plan area, these may pose future development opportunities as new communities begin to emerge through the redevelopment of the east Norwich area and demand for new homes remains.

Question 4: Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?

- 2.9 The fusion of commercial use classes to create Use Class E, supports the development of large sites through the master planning process. The East Norwich strategic regeneration area is an example of a site which could meet this need, and attract diverse businesses helps to create places and forge strong sustainable living and working patterns. It is therefore advised that section 7.1 does not need to be modified as we view it as consistent with national policy.

Question 6: Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNL0360/3053/R10?

- 2.10 We support the criteria in Policy 7.1 and agree that they provide a useful indication of the sustainability of a site such as the site listed in Policy GNL0360/3053/R10. Whilst there are three

points of reference to this site, our understanding is that the general criteria that is listed in Policy 7.1 applies to the broader area whilst what is set out in the East Norwich Master Plan and policy allocation relates to each site within that plan. Whilst some duplication may occur, it is not considered to be harmful to the delivery of the scheme.