



Greater Norwich Local Plan Examination – Matter 3 Statement: Strategy for the Areas of Growth

Date: January 2022

For: Rosconn Strategic Land

Issue 1: The Norwich Urban Area including the fringe parishes

Q1. 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?

The Plan proposes a very high level of growth across the relatively limited geographical area of the Norwich urban area with a particularly intensive focus on the built-up area of Norwich which will accommodate 3,680 homes through new allocations or 55% of the total growth within the wider urban area.

Norwich City Council, to whose administrative boundaries the built-up area corresponds, has continually struggled to demonstrate a five year housing land supply and it has built-up a deficit against its JCS target of 477 dwellings per annum (dpa). This data confirms the challenges the built-up area of Norwich experiences in the delivery of new homes yet the GNLP retains a considerable focus on this area.

East Norwich Strategic Regeneration Area (ENSRA) and Northern City Centre Strategic Regeneration Area are sizable and complex sites. It is unlikely they will deliver a significant proportion of their assumed capacity before 2038 to the extent they are deliverable at all. The Plan's considerable focus on these large urban sites has crowded out more deliverable alternatives within other parts of the plan area and mark significant transition to urban living at a time when the pandemic has seen a marked shift in demand away from flats.

The only part of the ENSRA to have received outline planning permission (Deal Ground) was granted in July 2013 and has yet to be commenced. It appears that the discharge of pre-commencement planning conditions are still being considered. As set out in Rosconn's Regulation 19 representations we have serious concerns about the deliverability of the remainder of the ENSRA as well as its consistency with national policy in terms of the of the sequential test for flooding.

The Northern City Centre Strategic Regeneration Area clearly has considerable issues as reflected in the decision of the Secretary of State to dismiss an application for up to 1,250 dwellings and associated commercial floor space on heritage grounds. Whilst it is understood the site promoters are preparing a revised application for a reduced scale of development on the site there is no guarantee this will address the site's significant heritage constraints.

Together the two strategic regeneration areas amount to over 5,000 homes to 2038 which equates to about half of the Plan's 22% delivery buffer. If these sites fail to deliver even a fraction of their assumed capacity this will considerably reduce the Plan's flexibility and ability to respond to changing circumstances.

Very limited evidence has been produced to demonstrate that these the two strategic regeneration areas are deliverable within the plan period and the evidence available suggests the contrary. It needs to be credibly established what proportion of the committed development within the strategic regeneration areas will come forward to 2038 and further allocations made elsewhere to remedy any anticipated shortfall. Given the difficulty in delivering even the



existing commitments within the strategic regeneration areas, we would also suggest that the further land identified in the Plan for allocation within these areas is acknowledged to be a longer-term aspiration that will likely only yield completions beyond 2038. Other, more deliverable sites should be identified to compensate for any shortfall.