# Greater Norwich Local Plan Hearing Statement Matter 8 – Strategic Growth Areas Allocations









Greater Norwich Local Plan Hearing Statement – Matter 8 (January 2022)

## Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP). The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

#### www.gnlp.org.uk

The Councils have responded to each question directly in the body of the Hearing Statement.









## Issue 1 East Norwich Strategic Regeneration Area

#### **Question 1**

The report to the Cabinet of Norwich City Council on 16 November 2021 indicates that the expected number of homes on the site should be reduced to 3469. Is the capacity of 4000 homes for the East Norwich Strategic Regeneration Area realistic and justified by the evidence?

## Response to question 1 -

- The figure of 3,469 referred to in the <u>Cabinet report on 17<sup>th</sup> November</u> is based on the published Stage 1 masterplan report (Avison Young, November 2021 <u>D1.4N</u> and <u>D1.4O</u>). The housing figure in the allocation (4,000) reflects the 5<sup>th</sup> Studio study (<u>D1.4M</u>) commissioned by the Norwich City Council in 2018. This high-level study explored the scale of the opportunity at East Norwich following the decision to close employment uses at the Britvic/Unilever site.
- 2. At its meeting on 17<sup>th</sup> November Cabinet approved the stage 1 masterplan and agreed to move forward to Stage 2 of the process. For clarification the report to Cabinet does not propose a reduction in the allocation from 4,000 homes to 3,469. Although the concept scheme in the Stage 1<sup>1</sup> masterplan refers to the redevelopment providing space to accommodate 3,469 residential units, this document is an illustrative and high-level framework which will be developed further in Stage 2 of the process, particularly in relation to infrastructure provision, phasing, deliverability and viability. The role of the masterplan process in refining the number of homes allocated on the site is acknowledged in the strategic allocation policy for East Norwich GNLP0360/3053/R10 which notes that "*The site is expected to deliver in the region of 4000 homes subject to confirmation through detailed master planning as defined in policy 7.1 of this plan*".
- 3. Further information about how the housing figure was calculated is set out in table 5.2 and the surrounding text on page 141 of the stage 1 masterplan. The approach taken involved a process of reviewing the constraints in order to determine the extent of developable land, preparing a scaled masterplan concept scheme with new development concentrated within the developable zones, significant areas of developable land being set aside for non-residential uses, and assumptions made on the split of housing and flatted development to reflect housing needs and to respond to anticipated absorption rates in the market. The table notes that the figures should be treated as interim and will be subject to change as the design evolves.
- 4. At this stage it is regarded that the figure of 3,469 is a reasonable estimate of what the site may be able to deliver based on reasonable assumptions. It is the product of

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<sup>&</sup>lt;sup>1</sup> Links to the draft stage 1 masterplan are available on the Norwich City Council's website in two parts: <u>https://www.norwich.gov.uk/ENMPart1</u> and https://www.norwich.gov.uk/ENMPart2

more detailed work that the previous East Norwich vision study and thus is considered a more reliable estimate of likely numbers of homes that may be delivered from the development. However, in no way is the figure intended to represent the capacity of the site. If the balance of houses to flats is changed or the scale or distribution of open space or employment uses are altered the capacity to accommodate residential development could change significantly and on a centrally located brownfield site such as this it is difficult to identify a capacity figure for the scale of development that might be accommodated. This is reflected in the working of the emerging policy which avoids using the word capacity in association with the housing figure. It is meant neither as an upper or lower limit on development levels.

- 5. On the basis of the currently available information the GNDP would have no objection for an amendment to be made to the emerging policy to reflect the fact that c3,500 homes appears to be a more a reasonable estimate of housing numbers the site may deliver than c4,000. However, it should be noted that work on the masterplan is continuing and the site's housing figure and will be further refined in Stage 2 which will involve a more detailed examination of viability and infrastructure costs/ delivery. The Stage 2 process may result in changes to the level of residential and non-residential uses set out in the Stage 1 concept masterplan.
- 6. Work commenced in November 2021 on Stage 2 of the masterplan process. This involves refinement of the masterplan through a more detailed examination of infrastructure delivery, further viability assessment and a review of assumptions. The key outputs consist of an infrastructure delivery plan, a strategic viability assessment, and a draft supplementary planning document (SPD) to support the policy in the GNLP.
- 7. Given the need for further assessment to refine the housing figure, this issue could be discussed further if required at an additional hearing session following conclusion of Stage 2, which is likely by end of April 2022.

# **Question 2**

Is the expectation that all 4000 homes on the site can be delivered before the end of the plan period realistic and justified by the evidence?

## Response to question 2 -

- 8. As noted above the number of new homes on the site is likely to be further refined through the masterplan process.
- 9. The Stage 1 masterplan report notes in sections 25.3 and 25.4 that delivery of the homes is linked to provision of key infrastructure including new roads, bridges, public transport, walkways and cycle ways, energy, utilities and social infrastructure. Alongside this built infrastructure there is a need for further investment to remediate land, manage flood risk, and to ensure that the site delivers biodiversity net gain.





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- 10. At this point in time the detail of infrastructure delivery and timing is still being developed, however work to date suggests that (subject to funding) both the infrastructure and a significant amount of housing can be delivered in the plan period, but the scale of delivery is still being established.
- 11. To inform the delivery of East Norwich an Infrastructure Delivery Plan (IDP) is being prepared as part of the Stage 2 work, which will confirm key infrastructure needs and the relationship between that infrastructure and the ability to develop the sites. The IDP will then link to a viability and delivery assessment which will confirm the rate of housing delivery and the level of housing that can be delivered linked to each infrastructure intervention.
- 12. Stage 2 is being developed in collaboration with key partners including landowners, statutory authorities and potential funders, as such it will capture a rounded assessment of both what is needed to enable development, how it can be funded and what the pace of delivery would be.
- 13. At present, despite the known infrastructure needs and development constraints, each landowner is confident that their sites are deliverable within the plan period, as set out in the Statements of Common Ground for the Deal Ground (D2.1), the Utilities Site (D2.2) and Carrow Works (D2.3). However, the masterplan at present expects delivery to extend beyond the plan period based on initial estimates of build out rates. Stage 2 is working with landowners to refine assumptions about annual delivery rates to identify where this can be increased. The focus of this work is to understand how the range of homes delivered can be broadened to avoid any 'over-saturation' of a particular market, which would slow delivery overall.
- 14. The starting point has been to consider how the different types and characters of homes and their settings can support delivery. There is a balance of both houses and flats across all sites, which would allow multiple plots to come forward at the same time and sell to different markets. The character of different parts of the sites will also appeal to different occupiers, for example parts of Carrow Works offer a more urban environment whilst the Deal Ground would (in parts) have a more 'village' type character again this helps support multiple points of sale at any one time.
- 15. Beyond the physical diversity of homes the tenure and 'product' type is also being considered. Landowners are actively considering the delivery of affordable housing, build to rent, retirement living and other housing products that again allow delivery to address multiple market opportunities at any one time. The masterplan evidence base has identified a need and likely demand for such a varied portfolio of housing types in this part of the city.
- 16. Together, these approaches would allow the delivery of homes within East Norwich to accelerate, exceeding what might be considered the local market absorption rates if the typology or product were narrower and enable more homes to be delivered in the plan period.





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- 17. It is worth noting that each landowner is progressing their sites in parallel to the preparation of the masterplan, which provides further confidence that sites will be delivered. At the time of writing the situation on each site is as follows:
  - a. Carrow Works is being brought forward by Fuel Properties, who entered into a formal pre-application process in December 2021 with the ambition of securing consent in 2023 and starting work on site shortly after.
  - b. The Deal Ground and May Gurney sites benefit from an existing consent, which has established the principle of development and also the detailed road and necessary river crossing alignments. The owners are progressing that consent and have advised the Council that they are at an advanced stage with a preferred development party and are finalising negotiations with them. The development approaches are broadly in line with the Stage 1 masterplan which show an increase in units over the previous consent.
  - c. The Utilities site owners have relevant board sign off to secure a development partner once the masterplan is in place and an access solution has previously been agreed with the owners of the Deal Ground/May Gurney and is reflected in the legal agreements linked to the extant consent on the Deal Ground.
- 18. Overall, whilst there is still significant work to do to confirm delivery mechanisms, overcome key constraints and establish a development trajectory for East Norwich, the evidence provides a robust basis to consider that delivery in the plan period can be achieved.
- 19. Beyond Stage 2 future phases of work will establish delivery mechanisms and establish the business case for investment in key infrastructure. As part of Stage 2 this is being progressed, both as part of the viability, funding and financing strategy (which is a formal output of Stage 2) and through early conversations with potential public funders (such as Homes England who sit on the partnership board), the Greater Norwich Infrastructure Delivery Board and private funders. Whilst these are early-stage conversations and no commitments are in place, they have signalled an interest to invest in the area in the future.

Is the site available and viable? Where is the evidence for this?

# Response to question 3 -

20. All the sites are considered available for development. The three site landowners have individually signed Statements of common ground (SOCGs) (Deal Ground <u>D2.1</u>, the Utilities Site <u>D2.2</u> and Carrow Works <u>D2.3</u>), which confirm their availability for development, and stress their involvement in the masterplan process to bring the sites forward for development. Network Rail is also a landowner and has signed a SOCG (<u>D2.4</u>) emphasising its involvement in the masterplan process to help unlock regeneration of the East Norwich area.





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- 21. Landowners are members of the East Norwich Partnership which was established in 2020<sup>2</sup>. Its purpose as set out in the terms of reference (D1.4M-A) includes partners working together on the development of a masterplan for the East Norwich area and addressing the need for investment in substantial new social and economic infrastructure to unlock the development potential of the site. The fact that the Partnership members have committed their own funds (£675,000 to date) to commission masterplan consultants and for project management of the masterplan is testament to partners' commitment to the masterplan process and demonstrates their willingness to work positively together towards the regeneration of this area. The landowners and other funding partners (notably including Homes England, the government's housing accelerator) are engaged in the masterplan development process through the East Norwich Steering Group which specifically oversees progress on the masterplan.
- 22. The viability of the East Norwich sites is currently being tested in more detail following an initial assessment to inform Stage 1 of the masterplan. This work is being undertaken alongside the landowners who each are promoting their sites as deliverable through the Local Plan and masterplan process.
- 23. The Stage 1 masterplan identified the scale of the challenge in terms of the 'abnormal' or 'extraordinary' costs associated with bringing forward the East Norwich opportunity and there is agreement across the East Norwich Partnership that a coordinated approach to delivery is needed to overcome these.
- 24. The Stage 1 process confirmed that there is a clear viability challenge based on the assumptions made at the time, however it also found that the sites can deliver a limited amount of value both in terms of developer profit (albeit below standard/expected commercial levels) and also through developer contributions which would have the potential to fund some of the infrastructure costs included in the assessment.
- 25. A simple sensitivity test of the Stage 1 assessment indicated that small increases in residential values had the potential to make a major change in the level of return, reinforcing the need to embed a strong place-led approach to the regeneration of East Norwich that will support stronger value performance.
- 26. The Stage 1 assessment made a number of high-level assumptions around the timing of infrastructure and development delivery, which are being reviewed as part of the more detailed Stage 2 viability testing. It did not test different approaches to funding, financing or timing the delivery of infrastructure, all of which could alter the viability position Stage 2 will consider this in more detail and identify strategies to positively impact the viability position.

<sup>&</sup>lt;sup>2</sup> Membership of the East Norwich Partnership includes Norwich City Council, Norfolk County Council, South Norfolk Council, the Broads Authority, Homes England, Network Rail, New Anglia Local Enterprise Partnership, and the landowners of the Deal Ground/May Gurney, Utilities site, and Carrow Works.





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- 27. Like many major brownfield regeneration projects, East Norwich carries a number of infrastructure costs that deliver benefits to a much wider area, but contribute to the viability challenge at the site specific level.
- 28. The IDP considers this cost and benefit relationship for each major piece of enabling infrastructure, identifying both the range and significance of benefit at different spatial scales (ranging from site specific through to sub-regional). Through the IDP process agreement is being built between the partners as to who benefits from a particular intervention, the cost of that intervention and what impact it has on scheme viability.
- 29. This approach begins to establish the clear business case for public sector investment into East Norwich, allowing such investment to be focussed on delivering key infrastructure that will make a positive contribution not only to the site, but also the city and sub-region. This forms the basis of identifying an 'equitable' approach to apportioning infrastructure cost between site development and other funding contributions.
- 30. Ultimately through a combination of public sector investment in infrastructure, which in turn alters the cost of delivery, establishes the quality of place and enables values to be achieved, a deliverable proposition for East Norwich can be established.

What works need to be undertaken to commence development on the site and then to progress the site through its delivery phases? To what extent do the sites' constraints such as flood risk, contamination, heritage, adjoining uses, and landscape features impact upon the deliverability of the site over the plan period and the total likely yield?

#### Response to question 4 -

- 31. From the outset it is important to recognise that the sites that make up the East Norwich opportunity are not consistently impacted by either the same nature or the same severity of constraint. Whilst some parts of the area are significantly impacted by extraordinary constraints, others are relatively unencumbered beyond relatively normal brownfield considerations such as demolition or remediation work prior to construction.
- 32. The May Gurney site, parts of Carrow Works and Carrow House would be examples of locations where constraints are relatively limited and could be commenced without the need to overcome major obstacles or costs. The heritage significance of parts of Carrow Works for example is a major opportunity with the potential to greatly enhance the 'offer' and attractiveness of the site following redevelopment.
- 33. The 'essential' infrastructure needed as part of the East Norwich regeneration area is set out in Figure 53 on p149 of the masterplan, this forms the basis of the IDP. Whilst the figure captures the list of infrastructure, it doesn't necessarily mean all





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infrastructure is required at the start of the development process – indeed some interventions will only be required later in the programme.

- 34. The overarching approach to the Stage 1 masterplan has been to establish a robust understanding of each potential constraint on delivery and develop a strategy for the area that works with these either by careful identification of development plots, or the establishment of strategies that allow them to be overcome in a manageable way. A summary of the constraints analysis is present in Section 6 of the masterplan and clearly shows the limitations of developable land in the area.
- 35. Ultimately, because the masterplan has been developed in this way, the development constraints have been managed and strategies for overcoming or working with them developed. As such, subject to viability, none present an obstacle to delivery in and of themselves and would therefore not constrain the development yield to a lower level than the masterplan has established.
- 36. In broad terms, across both the Utilities site and the Deal Ground the major 'up front' issues fall under two key themes access and flooding.
- 37. Both sites are contingent on the delivery of new river crossings, the Deal Ground requires a crossing of the River Yare from May Gurney, whilst the Utilities site requires a more significant crossing of the River Wensum from the Deal Ground. Neither can deliver housing until these access routes have been established.
- 38. There is a body of evidence that has been built up to identify the locations for these crossings and the nature of the structure required. Both were included in the extant consent granted for the development of the Deal Ground, the County Council in 2020 commissioned work from WSP to look at access options and provide initial costs and the Stage 1 masterplan again considered these from the wider perspective, refining down to a preferred access approach and updated the cost of each. As such there is a high degree of confidence at this stage of the deliverability of each crossing.
- 39. Outside of these crossings there are other accessibility interventions that are required to support delivery of all sites within East Norwich and integrate the area into the city and the Broads. As shown in Figure 53 on p149 of the masterplan, the core focus is the major east-west spine that connects King Street to Whitlingham and requires new access at the King Street side of Carrow Works, refurbishment of the underpass between Carrow Works and Deal Ground for pedestrian and cycle use and a new crossing over the River Yare (for pedestrian and cycle) to connect Deal Ground to Whitlingham Country Park and the Broads beyond.
- 40. Work is underway to prepare an initial feasibility study into the approach to re-using the underpass in partnership with Network Rail and the adjoining landowners and will report in parallel to the Stage 2 masterplan outputs.
- 41. Other key connections for pedestrians and cycles include a new bridge between Carrow Works and Carrow Road, improvements to the underpass between Hardy

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Road and the Utilities site (under the rail line) and enhancement of the bridge between the Utilities Site and Cremorne Lane. These are key elements of the overall movement framework set out in Section 14 of the masterplan, but could be delivered in parallel rather than advance of the sites themselves.

- 42. The second up-front constraint impacting the Deal Ground and Utilities sites in totality is how to manage flood risk. Both have areas of Flood Zone 3b within them, but also areas where there is a lower risk of flooding.
- 43. As set out in the Stage 1 masterplan (Section 20) the strategy has been to avoid development in the highest risk areas where possible. Figure 64 shows where there are some minor incursions into this within the Deal Ground and identifies approaches to mitigating this including the lowering of the river frontage to create extra storage capacity and the secondary benefit created by the introduction of new marina basins in both the Utilities and Deal Ground sites.
- 44. In parallel with the Stage 2 work, further analysis of the flooding strategy is being undertaken in partnership with the relevant local authorities and the Environment Agency. This includes modelling work to establish the impact of the mitigation measures proposed and will support the finalisation of Stage 2 and the draft SPD.
- 45. Outside of these up-front issues that need to be dealt with to unlock two of the key sites there are other constraints that need to be addressed as development progresses at a site-specific level, again strategies for these are set out in the masterplan.
- 46. For the Carrow Works site the key consideration for development is the approach to the multiple heritage assets within the site, ranging from locally listed structures through to the Scheduled Ancient Monument (Carrow Priory).
- 47. A baseline heritage assessment prepared specifically for the masterplan and shared with Historic England is a fundamental part of the masterplan evidence base this covers built and archaeological heritage and sets the heritage framework for the masterplan approach to the Carrow Works site.
- 48. As set out in Section 13 of the masterplan there are a significant number of heritage assets, conservation and landscape factors (Figure 35 on p105) that the masterplan seeks to embrace and use as a key component of the future identity of East Norwich.
- 49. Figure 36 (p.107) shows how the masterplan retains and integrates all the listed buildings and some of the undesignated heritage assets into the redeveloped site, creating sympathetic settings and relationships for each with new development.
- 50. It also sets out the opportunity to bring these assets back into active use in a manner that is sympathetic to the nature and history of each building and cognisant of the long-term maintenance requirements and the need for an income stream to fund this.





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- 51. Critically, the masterplan looks to improve the visibility and ability to experience the SAM and Grade 1 listed Abbey, celebrating it as the centre piece of the new community.
- 52. The other major influence on the location and nature of development across the East Norwich area is the ability to manage the relationship with the rail line and associated functional assets of Crown Point depot, the Tarmac LaFarge works and the rail head to the south of the Wensum. All have potential noise and air quality impacts on land closest to them.
- 53. The land use strategy for the masterplan takes this into account, using a range of nonresidential uses and open space as a buffer between the infrastructure and residential development. The Stage 1 masterplan proposals were developed in dialogue with both Network Rail and Greater Anglia to understand the sensitivities of their activities and assets.
- 54. Following the completion of Stage 1 and comments from Network Rail and Norfolk County Council Minerals and Waste team the land use strategy for sites adjoining the rail corridor is being revisited to ensure appropriate uses and mitigation measures are included at this stage to avoid any 'bad neighbour' issues in the future. It is not considered these will have a material impact on the capacity of East Norwich or the deliverability of sites.

Does the evidence support the position that 100 homes will be delivered on site in the 2024/25 period? When is commencement expected? What are the key stages that have to be met? Does the evidence support that lead in time?

## **Response to question 5 -**

- 55. A detailed strategy for housing delivery is yet to be developed, however as a baseline position the Stage 1 viability work assumed that East Norwich would as a minimum deliver c.90 units per annum, based solely on a market sale product. As discussed under MiQ 2 there is scope to increase the annual delivery rate considerably by widening the range of residential products and typologies within the area.
- 56. Therefore, should sites be ready to deliver in this time frame reaching that level of delivery is not likely to be an issue.
- 57. In terms of delivering 100 units in 2024/25 there would be a requirement for the release of some 'early win' plots across the area that are relatively unincumbered by major infrastructure delivery. As noted under MiQ4 some parts of Carrow Works and also the May Gurney site have conditions that could enable delivery to come forward in advance of major infrastructure works.





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58. The key constraint will be the ability to gain the necessary planning consents in time and then the ability to deliver the units relatively quickly. This may be a challenge based on the current status of each site in terms of planning.

## **Question 6**

Does the evidence support the housing trajectory for the site which includes a delivery of 500 homes in 2031/32 and 2033/34? What assumptions regarding infrastructure delivery, site assembly, and lead-in times have been made?

## Response to question 6 -

- 59. At present the housing trajectory is based on a high-level assessment of site constraints, mitigation measures, site capacity and market absorption. The Stage 2 work is testing this in much more detail and developing a better understanding of the reliance on certain infrastructure to deliver housing and the timing of that infrastructure.
- 60. As noted under MiQ2, as part of this work the approaches to accelerating delivery are being investigated, both through the differentiation of housing products and the timing of infrastructure delivery.
- 61. The ability to reach delivery of 500 units per annum would be reliant on a number of factors, some of which are beyond the control of the East Norwich partners.
  - a. Firstly, it is more than likely that to reach this figure all component sites would need to be actively delivering homes this means that (as a minimum) all flood and access barriers have been addressed.
  - b. Secondly it would require sufficient momentum to have been established in East Norwich to generate demand in the market as it represents a significant uplift vis a vis delivery rates in other city centre sites – this means key placemaking infrastructure is in place.
  - c. Thirdly, it would require a range of different typologies and products which the masterplan provides the framework for and landowners are supportive of.
  - d. Fourthly, it would require the wider economic climate to be positive to provide confidence from investors and buyers which is beyond the control of the partners.

## **Question 7**

Does Policy GNLP P03060/3053/R10 provide an effective framework for the delivery and proper planning of the East Norwich Strategic Regeneration Area? Is the Policy consistent with the overall vision and objectives of the Plan and with national policy?





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## Response to question 7 -

- 62. Policy GNLP P03060/3053/R10 provides an effective framework for the delivery and proper planning of the East Norwich Strategic Regeneration Area (ENSRA). There is a need for a coordinated approach to the regeneration of these sites, some of which are heavily constrained, through policy supported by masterplanning. The policy requires comprehensive development of the site together with provision of all necessary social and economic infrastructure, to ensure delivery of a new sustainable urban quarter for Norwich and contribute to the wider Greater Norwich economy. Its structure, setting out requirements across the ENSRA site as a whole plus individual requirements for the three specific sites within it provides clarity for developers to assist with implementation.
- 63. The policy's site-specific requirements reflect the key masterplan requirements / constraints set out at a strategic level in policy 7.1 and are highly consistent with the GNLP's vision and objectives. For example, the policy requirements include delivery of an inclusive, resilient and safe community in this highly sustainable location on the edge of the city in close proximity to the city centre and to the Broads National Park, with improved connectivity for walking and cycling, which will encourage healthy lifestyles and a good quality of life for residents. The significant number of proposed new homes (precise numbers subject to stage 2 masterplanning) will help meet the growing needs of those living and working in Greater Norwich, whilst significant jobs growth in this location will help stimulate and strengthen the local economy. The required provision of necessary social and economic infrastructure in the policy as noted above is central to the delivery of this strategic allocation. Social infrastructure provision such as educational and health provision will ensure that the development will serve the needs of the growing community, whilst physical infrastructure provision such as bridges and an improved riverside walk, green infrastructure and cycle connections for example will encourage modal shift and healthy communities.
- 64. The site's allocation as a strategic regeneration area policy is consistent with the national planning policy framework (NPPF) which states at paragraph 72 that 'the supply of large numbers of new homes can often be often best achieved through planning for larger scale development... provided they are well located and designed, and supported by the necessary infrastructure and facilities' and at paragraph 103 'Significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes...'. (see Norwich Urban Area Topic Paper, paragraph 12).
- 65. The policy will be supported by a supplementary planning document to ensure that growth is coordinated, overcomes constraints and is well-designed in a sensitive location adjacent to the Broads National Park (see GNLP paragraph 334). As noted above the SPD is currently in production as part of Stage 2 of the masterplan process. Following consultation, it is anticipated that the SPD will be adopted by the Greater Norwich authorities alongside adoption of the GNLP.





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Does the Policy effectively ensure the protection and enhancement of heritage and other assets on or close to the site?

#### **Response to question 8 -**

- 66. The Stage 1 masterplan provides the 'physical' interpretation of policies 7.1 and P03060/3053/R10 and sets out the principles for how spatially the objectives of the policy can be achieved. As clearly set out in Section C of the masterplan report the approach has been heritage-led, allowing both the physical and social history and assets to inform the approach to its future use.
- 67. It has been underpinned by an objective assessment of the value of each heritage asset on the site and evolved from that base understanding to create a framework that respects and protects these assets. At an early stage Historic England were engaged and the masterplan itself responds to feedback provided by them. This has meant the masterplan not only retains designated structures but also non-designated ones where they positively contribute to the character of the site and the legibility of its past use.
- 68. Ultimately, the masterplan uses the site's heritage to frame its future, celebrating designated and undesignated assets as key elements of the place and the foundations of its future identity. Physically the land use and development strategy seeks to both provide an active use for each asset and also ensure new development is respectful both of the asset itself and its setting.
- 69. Norwich City Council and the East Norwich Partnership (ENP) are taking a proactive approach to ensure heritage led regeneration in the East Norwich Strategic Regeneration Area. The Partnership is strongly supportive of ensuring that the masterplan for East Norwich is based on an accurate assessment of the immense legacy of heritage assets that exist on site, and is working closely with Historic England (HE) on this. This demonstrates the positive commitment on the part of the ENP to heritage led development and the use of heritage assets to help shape the future regeneration of East Norwich.

## **Question 9**

Does the Policy effectively ensure that the site will be developed to maximise sustainable transport options in accordance with Chapter 9 of the National Planning Policy Framework?

#### **Response to question 9 -**

70. The Stage 1 masterplan provides the spatial interpretation of the Local Plan policy for East Norwich and will, in time, underpin an SPD that guides the development of the site. Guided by the policy, local stakeholder priorities and Member's clear direction the







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masterplan prioritises sustainable transport modes – both for walking, cycling and wheeling and public transport.

- 71. As part of the masterplan development process the masterplan team worked with the Council's Local Cycling and Walking Implementation Plan (LCWIP) team to ensure routes within the site made effective links to wider walking and cycling routes within the city and have identified the opportunity to reroute the national cycle route (NCR1) from its current busy Bracondale route from Trowse to the city to the East Norwich East-West spine (as shown in Figure 43).
- 72. More broadly, Figures 42 and 43 together show how both walking and cycling connections to and through the site are enhanced and prioritised to provide safe, direct and attractive routes that encourage usage to move both to the city and the Broads.
- 73. The masterplan also integrates new bus routes that will mean residents are in close proximity to bus stops, encouraging use of public transport. Again, this has been conceived as part of the wider existing bus route network to provide onward connections across the city.
- 74. A mobility hub, eVehicle charging and hire capacity and eBike hire facilities cycling are identified as essential infrastructure for the masterplan (Figure 55) and again support residents to use sustainable modes of transport rather than private car. Other concepts such as river taxis are also considered an opportunity but would need further testing in terms of the viability of the service.
- 75. In parallel to the positive promotion of sustainable transport, parking provision is also carefully balanced to ensure there is sufficient parking to support housing demand, but it is also proportionate to the sites' location and proximity to the city, rail station etc. The masterplan also makes provision for some areas identified for parking in early stages to be repurposed later on once behaviours have changed.

# Question 10

How will key pieces of infrastructure within the site be delivered, including those that cross ownership boundaries (such as bridges across the River Wensum and River Yare)? How will these pieces of infrastructure be funded?

## Response to question 10 -

- 76. Stage 2 of the masterplan process is focussed on establishing the funding strategy and delivery approach for key infrastructure and therefore, at this point in time, there is no set approach to bringing it forward within the masterplan.
- 77. However, the majority of critical infrastructure required to support the delivery of East Norwich lies within land controlled by the project partners, as such there is already in principle support to working together to secure its delivery. It is worth noting, the most significant piece of infrastructure (the crossing of the River Wensum between the Deal





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Ground and Utilities site) is already subject to a legal agreement between the landowners.

- 78. There are three components of the access infrastructure that will require third party land agreements outside of the existing Partnership.
  - a. The crossing from Carrow Works to Carrow Road will require agreement with the landowner on the north side of the Wensum.
  - b. Access from King Street into the Carrow Works site will require agreement with the owners of Papermill Yard
  - c. The crossing from the Deal Ground to Whitlingham will require agreement with Crown Point Estate who own the land to the east of the Yare
- 79. At present no direct or formal engagement with the landowners on these issues have been undertaken, however all have been invited to engage more widely with the masterplan process.
- 80. The delivery mechanisms and agreements for each piece of infrastructure will form work beyond Stage 2 of the masterplan and be a critical component of the business case for each intervention.





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