

**Matter 8**

**Issue 1: East Norwich Strategic Regeneration Area (ENSRA)**

**Q2: Is the expectation that all 4,000 homes on the site can be delivered before the end of the plan period realistic and justified by the evidence?**

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- 1.1 At the time of submitting our representations at Reg 19 stage, the Partnership had not obtained sufficient delivery data from individual sites. Instead, they had made calculations of delivery based principally on an average of past delivery rates on different sites with entirely different issues [Doc A1 appendix 6, page 144]. We cast doubt on the accuracy of such assumptions, particularly in circumstances where the plan relies heavily on the development of large complex sites such as at ENSRA. We requested the ability to comment further if and when additional evidence was produced.
- 1.2 We note the Partnership's answers to the Inspectors' initial questions 21 and 22 contained in their updated response in November 2021 [Doc D1.4A pages 20-24]. While we have no concern about the merits of attempting to bring forward a substantial mixed-use scheme on the combined sites, which make up the ENSRA, we remain to be convinced by the Partnership's answers about the ability of the sites to deliver the total number of 4,000 homes in the plan period.
- 1.3 By their own admission, the 4,000 dwellings referred to in the policy and first identified in 2018, based on a Fifth Studio study [Doc D1.4M] has, with further refinement in the Stage 1 Masterplan [Doc D1.4N and D1.4O] already been reduced by 531 to 3,469 residential units. Paragraph 90 of the Partnership's response states dismissively "*the level of housing development is somewhat lower than that envisaged in the GNLP allocation policy but not significantly so, given the site constraints.*"
- 1.4 We understand from paragraph 93 of the Partnership's response that the Stage 2 Masterplan process is anticipated to be completed by the end of March 2022. The response concludes that "*it will involve refinement of the masterplan through a more detailed examination of infrastructure delivery, further viability assessment and a review of assumptions.*" Such refinement will be too late for consultation and consideration in this programmed examination and even then, will require further refinement given the inevitable need for further consideration and consultation on the site constraints.
- 1.5 During November 2021 the Partnership has provided Statements of Common Ground (SoCG) drafted in liaison with the individual landowners of the combined three key sites which make up the ENSRA and the neighbouring operational site of Network Rail Infrastructure Ltd.
- 1.6 We note the optimism provided by Fuel Properties (Norwich) Limited in respect of GNLP3053. In response to point 4 of the SoCG they state an anticipated start on site in 2023 with occupation beginning in 2024 [Doc D2.3]. Given the constraints of the site and the work still to be carried out to assess key elements and solutions, such a start date appears overly optimistic and one which should be robustly tested.
- 1.7 The SoCG provided by National Grid/RWE for site R10 [Doc D2.2], Maddox Planning for site GNLP0360 [Doc D2.1] and Network Rail Infrastructure Limited [Doc D2.4] recognise the very real infrastructure challenges which exist in delivering such development. In response to point six in the SoCG, National Grid/RWE state:
- 1.8 "*The site is accepted as having a number of development constraints – it is a former gas works with limited access. It is expected that access related constraints could be overcome with external help and contributions. However, further constraints relating to the site's historic gas works and power station use (enabling works, demolition and land contamination for example) as well as constraints on developable areas adjacent to the*



*railway and relating to easements/PADHI zones, will require consideration in the detailed design and to be bolstered by a comprehensive suite of technical work.”*

1.9 In their response to point 1 in the SoCG they further state:

1.10 *“In representations submitted to Regulation 18 in March 2020, we expressed that the site has been cleared and is available, suitable and deliverable for development within years 0 to 5 of the plan. However, any progression of the site is subject to ensuring that a suitable access arrangement can be funded and viably implemented, or else a longer timeframe would ensue.”*

1.11 Network Rail Infrastructure Limited's SoCG [Doc D2.4] suggests the need for caution and recognition of the need to respect or relocate a number of long established and long-term rail related uses incompatible with residential development. These include extensive areas of the Trowse Freight site, Trowse maintenance and operational site and the Crown Point rail depot.

1.12 In view of these and other potential infrastructure constraints, including those related to flood risk and viability, the delivery of 4,000 homes on the site before the end of the plan period remains overly optimistic.

## 2 **Recommended remedy**

2.1 The challenges of delivery facing the ENSRA together with challenges on other sites elsewhere in the plan confirm the need to recognise the requirement to identify additional sites for allocation, increase the number and range of contingency sites or both. Such a remedy would give confidence that the plan is effective, justified and sound.