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Greater Norwich Local Plan EIP Hearing Statement

Matter 8 Issue 1

Iceni Projects Limited on behalf of
Fuel Properties Ltd

January 2022

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ON BEHALF OF FUEL
PROPERTIES LTD

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**Greater Norwich Local Plan EIP Hearing
Statement**
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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 8 STRATEGIC GROWTH AREAS ALLOCATIONS 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?

- 2.1 Fuel support the 4000 home figure being maintained, together with supporting text that stresses the need to maximise deliverable housing supply from the East Norwich Strategic Regeneration Area.
- 2.2 The figure of 3469 homes reported to Cabinet in November 2021 has not been based on a thorough assessment of the townscape, nor the potential of different spatial/massing approaches.
- 2.3 National planning policy strives to make the most effective use of *previously developed land to ensure that land is efficiently used and that undeveloped land is not needlessly lost. It is important that this objective is met by optimising available brownfield sites, such as the East Norwich Strategic Regeneration Area, which is the largest brownfield site in the East of England.
- 2.4 With just 22% of the Plan's homes due to be delivered on previously developed land, it would be a mistake to reduce the housing figure for the East Norwich SRA based on one initial high level piece of evidence, which is yet to properly consider townscape and viability issues and was very much prepared as a starter-for-ten study, prior to refinement in Stage 2 of the Masterplan process.

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?

- 2.5 The development of the Carrow Works site can be substantially delivered by the end of the sixteen-year plan period. The division of different sections of the sites means that a variety of different kinds of housing will all be able to be delivered and multiple housebuilders that will provide different types of housing can develop on the site simultaneously. The existing transport connections and infrastructure, which would not be available on a greenfield site, also significantly improves the deliverability of this scheme.
- 2.6 Carrow Works can be delivered for circa 2,000 homes (higher than that indicated in the November 2021 report to Cabinet on the Stage 1 Masterplan) and the intention is to deliver all of the homes within the Plan Period by creating different housing product and a range of housebuilding delivery companies and organisations.

Question 3: Is the site available and viable? Where is the evidence for this?

- 2.7 The site is in single ownership and is available upon grant of planning permission. Fuel Properties is looking to submit a hybrid planning application for the Carrow Works site in Summer 2022.
- 2.8 To ensure that the site is fully viable, joint working and coordination between all stakeholders to ensure external funding is secured that all requirements set out in policy is adequately met.
- 2.9 A viable development can be delivered, but this is reliant upon the joint working and coordination of all stakeholders involved, and leveraging in external funding sources to allow the scheme to meet all policy requirements as set out in the Greater Norwich Local Plan and East Norwich Master Plan.
- 2.10 Initial viability work has been undertaken as part of the Stage 1 Masterplan, but more detailed viability work based on a thorough understanding of infrastructure requirements and costs is being undertaken as part of Stage 2. The project commands high levels of political support and a commitment from Norwich City Council to use all avenues available to it to unlock the site. This approach is evident from the Council's acquisition of Carrow House, the structure it has created to advance the SRA through the Masterplan, and the joint working with key stakeholders such as Homes England, Historic England, the County Council and others.

Question 4: 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 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?

- 2.11 The site at Carrow Works is largely unused and therefore immediately available upon grant of planning permission. A hybrid planning application is being prepared which will secure the first phase of development and provide full detail of the scheme and its subsequent delivery phases.
- 2.12 As the site is previously developed for industrial development and scope exists to re-use key elements of its existing infrastructure, such as internal access road and principal vehicular access point, which will speed up delivery and help minimise external impacts of construction in the area such as HGV traffic. All listed buildings on the site are proposed to be retained. Those covered by the first phase will be converted into mixed uses including residential.
- 2.13 As part of the first phase, the principal movement routes, including the corridors through and around the site which provide access into the principle public realm and crucial access for immediate and city residents to access to the Broads beyond the site to the east, are due to be secured and delivered, which will help to pump-prime different sub-areas of the site, as well as delivering early regeneration benefits.

Question 5: 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?

2.14 We are working to the following schedule:

Stage:	Expected completion by:
Planning Application Submission	Summer 2022
Determination	Summer 2023
Pre-development conditions clearance	Summer 2024
First year Delivery	Summer 2025

2.15 Based on the above schedule it is a reasonable expectation that the scheme can deliver 100 homes by the end of 2025.

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?

2.16 There is every reason to believe that the SRA can deliver 500 homes per annum by 2031-32. First housing delivery at Carrow Works is projected for 2025, and with a multitude of housing delivery companies and organisations on-site together to deliver a varied house type and diverse tenure ranging from affordable family homes to PRS apartments, there is very high probability that Carrow Works can be delivering several hundred homes per annum at that stage of the construction period.

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?

2.17 Policy 7.1 relating to the SRA as a whole, Policy GNLP P03060/3053/R10 relating specifically to the site at Carrow Works (as well as the other sites within the SRA) and the East Norwich Master Plan (which is likely to be enshrined within a Supplementary Planning Document by the time Carrow Works is determined) serve as a cascading policy framework to guide scheme formulation and support delivery.

- 2.18 Whilst the policies duplicate in some respects, the more strategic policy 7.1 informs the Masterplan/SPD, whilst the allocation policy and SPD are more site-specific. Each site has its own unique characteristics, circumstances and consequently planning issues to resolve, and this has been reflected in the policy framework.

Question 8: Does the Policy effectively ensure the protection and enhancement of heritage and other assets on or close to the site?

- 2.19 All assets within the East Norwich SRA have been subject to Historic England's Enhance Advisory Service in the latter half of 2021. Through this process, all existing buildings, including existing recognised heritage assets have been reassessed under the Listed Buildings and Conservation Areas Act (1990).
- 2.20 This process has recommended several additional candidates for listed buildings/structures within the strategic regeneration area, and will inform the scheme at Carrow Works. National Planning Policy and the encompassing role being played by Historic England, NCC Archaeology and the City Council's Conservation and Design teams ensure that the protection/enhancement of the existing heritage assets on the site continues to be a key consideration in scheme evolution and future assessment.

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?

- 2.21 As part of the terms of reference of the East Norwich Master Plan, the Steering Group team have identified high modal split as a key development objective in order to deliver a scheme befitting of the SRA's excellent sustainability credentials and potential to achieve sustainable living and working patterns.
- 2.22 The parking strategy for Carrow Works is still in its infancy at this time, but the objective to reduce car use and create the infrastructure to enable highly sustainable behaviours to be practised continues to inform both the Infrastructure Delivery Schedule through the Masterplan and the scheme design for Carrow Works.

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?

- 2.23 The key infrastructure that is required through the allocation of this site are identified in the Infrastructure Delivery Schedule in the East Norwich Master Plan as part of Phase 2.

- 2.24 With respect to Carrow Works, Fuel has identified a footbridge over the River Wensum in the north west corner of the site and the opening up of the underpass below the railway line on the eastern edge of the site as key pieces of infrastructure that Fuel is assuming it will need to deliver within Phase 1 of the development.