

Greater Norwich Local Plan Examination in Public (Part 1)

Matter 8, Issue 1

Statement on behalf of Halsbury Homes Ltd



MATTER 8 – STRATEGIC GROWTH AREAS ALLOCATIONS

Issue 1 – East Norwich Strategic Regeneration Area

[Jointly prepared with Lichfields]

Q1. 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 4,000 homes for the East Norwich Strategic Regeneration Area realistic and justified by the evidence?

1.1 We do not consider that the capacity of this site is either realistic or justified. The GNDP is currently still at the 'Concept Masterplan' stage with East Norwich and there has not been any detailed work undertaken by the GNDP (which is in the public domain) to understand how much land is developable and how much development can be achieved on any land which is developable. There are numerous – unresolved – issues which would impact on how many homes can be delivered on the site (which we also set out in our response to Matter 3 Issue 1 Q1), including:

- 1 Biodiversity – the Norwich Site Allocations Local Plan ('SALP', 2014) identified biodiversity as an issue in relation to two sites within the East Norwich area and these issues are echoed in the emerging Part 2 Sites Plan which states (para 2.10 (vi)) *"Development must protect and enhance key areas of landscape and biodiversity value, green infrastructure assets, corridors and open spaces within the area, including enhancing linkages from the city centre to the Broads, Whitlingham Country Park, Carrow Abbey County Wildlife Site, the wider rural area and elsewhere in Norwich. Development must demonstrate the means to retain and maintain these assets in perpetuity"*. The current Concept Masterplan does show substantial portions of the site being used for an improved County Wildlife Sites and new riverside parkland, although no detailed work has been undertaken by the GNDP on how many homes could be provided on the site whilst ensuring any biodiversity impacts can be appropriately mitigated;
- 2 Flooding – again, the issues related to flooding highlighted in the earlier SALP are reiterated in the Part 2 Sites Plan at 2.10 (xi) *"...site-specific flood risk assessments must be undertaken prior to development... parts of the sites are within the floodplain of the River Yare... there should be a significant buffer between development and the floodplain..."*. The current Concept Masterplan identifies substantial portions of the site for new river-basins to help with flood mitigation but again no detailed work has been undertaken to identify how much of the site could realistically be developed, taking into account the need to mitigate against flooding;
- 3 Site pollution – noted in the earlier SALP, issues related to the noise, dust and odour associated with the various surrounding uses were again raised in the Statement of Common Ground produced by Network Rail (D2.4) which highlighted the potential

incompatibility of this pollution with residential and other uses. No detailed work has been undertaken by the GNDP to identify how these constraints might influence the overall masterplan and/or the total amount of development which could be accommodate on the site;

- 4 Contamination and land remediation – development of this site will need to address site contamination associated with historic industrial uses and remove redundant utilities infrastructure and overhead power lines, as acknowledged in the Part 2 Sites Plan 2.10 (v). There is no evidence from the GNDP how these constraints will influence the overall number of homes that can be provided including the viability of the site; and
- 5 Infrastructure requirements – a significant amount of upfront infrastructure is needed to enable development across most of the East Norwich site, and it is currently unclear from the GNDP that the necessary funding is in place for these works. These requirements are identified in the Part 2 Sites Plan at 2.10 (i) and include, for example:
 - a The Deal Ground (the south-east parcel of land, as indicated in the emerging plan Map 9) is subject to an outline permission for up to 670 units, which was granted in 2012 as set out in the SALP 2014. However, the application itself identified a need to provide several new vehicular and pedestrian access points including various bridges, which was reiterated in the SALP; and
 - b The Utilities Site (the north-east parcel of land) is currently inaccessible and, as set out in the National Grid/RWE Statement of Common Ground (D2.2) development is “*entirely reliant*” on the delivery of a spine road from the Deal Ground site and a new bridge. No permission currently exists on this site and there is clearly a significant amount of upfront infrastructure required which the GNDP has not shown to be viable or feasible.

If two of the parcels of land (the Deal Ground and Utilities site) are unable to provide any housing then the overall ability of East Norwich to deliver the 3,500-4,000 homes envisaged by the GNDP is seriously undermined.

- 1.2 Whilst the Part 2 Site Plan (at para 2.9) asserts that the new allocation of the Carrow Works site will present the opportunity to unlock all sites in East Norwich, this is not in and of itself a reason to now consider the other sites (Deal Ground, Utilities sites) deliverable. Firstly, there is a lack of evidence that the Carrow Road site itself is deliverable (and at the rates envisaged by the GNDP). Secondly, even if were deliverable, the numerous and substantial issues and constraints which exist on the other sites remain. The sites were subject to the same constraints and issues which existed when the 2014 SALP was adopted (which followed an outline application on the Deal Ground site, which has seen no progress since). The allocation in the Part 2 Sites Plan simply reiterates these constraints and re-allocates the site for development without any evidence to show progress has been made towards addressing/overcoming these constraints in the interim.

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?

- 1.3 It is not realistic or justified by the evidence to assume that the site can deliver all its homes before the end of the plan period. As outlined above in our response to Q1 above the site is subject to numerous constraints which could take years to address, and only one part of the site is currently the subject of any permission whatsoever (the Deal Ground site) and this is a permission which has existed for nearly a decade without any progress being made on the site. Lichfields research Start to Finish¹ finds that sites of 500-1,000 dwellings have a planning approval period² of just over 3 years (which the Deal Ground site has already substantially exceeded) with a further nearly 2 years between approval and delivery of the first home. There is therefore no basis for assuming delivery at East Norwich (specifically the Deal Ground site) will commence delivery in 2024/25. With no applications on the other sites in East Norwich (notwithstanding that they may be currently unsuitable, unavailable or unachievable) even if all constraints were overcome, delivery would still be at least c.5 years away from the point at which a first application is validated (based on Lichfields research), although in reality for East Norwich the lead in time would be substantially longer than average due to the significant amount of upfront infrastructure and opening up works which are needed before any homes can be built.
- 1.4 Even if the site were able to come forward and commence delivery, there is also no evidence that the site will be able to achieve the rates of 500 dwellings per year from 2031/32 to 2033/34. Lichfields Start to Finish research found no evidence of such sustained high built out rates, even on greenfield sites with multiple outlets in strong housing markets. We explored the reasons why this was particularly unachievable on an urban site in the Greater Norwich Housing Market in our response to Matter 3 Issue 1 Q1 (para 1.10-1.14).

Q3. Is the site available and viable? Where is the evidence for this?

- 1.5 We do not consider the site as a whole to be currently available. The site is in multiple ownership, each with different existing uses and thus different timescales for availability. This includes:
- 1 Network Rail – as per D2.4, various operations exist on Network Rail’s land including the Trowse Freight Site, Trowse Maintenance and Operational Site and Crown Point Depot. These are all currently in use and are therefore by definition not currently available. The movement of any operations to alternative sites would – even assuming this is feasible and possible – is likely to take several years whilst alternative sites are found. D2.4 indicates this is unlikely to take place soon, stating

¹ Available [here](#)

² The period from validation of the first application to the granting of permission which allows development to commence. This could be the granting of reserved matters applications (following an outline permission) or the granting of a full permission.

"Network Rail will explore relocation and consolidation options if feasible to help unlock the strategic allocations..."

- 2 Fuel Properties Ltd – D2.3 identifies that Carrow Works is vacant and being actively promoted for redevelopment. D2.3 also notes that a SPD for East Norwich is expected to be adopted in 2022 and a planning application will be prepared alongside. It notes that a number of technical documents have been prepared to accompany the application, however D2.3 is unclear whether these relate just to the Carrow Works site or the East Norwich Regeneration Area as a whole. Further, as these technical documents are not in the public domain it is not possible to scrutinise their findings.
- 3 National Grid/RWE – whilst D2.2 does state the Utilities Site is vacant and available for development, the site is fundamentally constrained by its lack of access. D2.2 clearly states that *"The Council and adjoining landowners of the Deal Ground Site are aware that access to the Utilities Site is entirely reliant on the delivery of a spine road from the Deal Ground Site, with a bridge crossing the river into the Utilities Site. As previously mentioned, discussions are in the early stages with a view to securing funding for the delivery of this essential infrastructure"*. With such a significant barrier to development it is highly questionable why National Grid/RWE consider the site to be achievable within years 0-5 of the plan (as set out in D2.2), or that development is even viable overall.

1.6 There is no evidence that the site as a whole is viable. The plan's own viability study (B26.3) does not include a site even broadly comparable to East Norwich in its site typologies³; given East Norwich represents roughly 10% of the overall supply we would expect to see this site specifically – or at least a very similar site typology – in the viability assessment. The largest urban centre site in the viability assessment is for 100 units (site typology 7) and even this shows marginal viability (see B26.3 executive summary). The largest site assessed is 1,000 units and this is not comparable to East Norwich as it is an urban fringe/main town site; it would also not have been subject to the same assumptions about development costs, specifically abnormals, which are key to understanding viability in East Norwich.

1.7 Our representations (see above and response to Matter 3 Issue 1 Q1) highlight the numerous upfront infrastructure requirements, constraints and abnormal costs associated with the site, as well as the difficulty the local housing market faces in absorbing the types of high density development envisaged on the site. The rate of market absorption will also be negatively impacted if – as the Part 2 Sites Plan envisages (at 2.10 (ii))– the development is a 'low car' environment because of lower demand for homes which do not have parking. Some parts of the site are entirely reliant upon new infrastructure (roads, bridges) because they are currently

³ Additional site typologies were assessed in the viability assessment supplement (B26.5) but these were for urban sites of 25-50 dwellings.

inaccessible, and it is unclear how this necessary infrastructure will be funded. The fact that the site faces viability issues is also evident from the fact that outline permissions have existed on various parts of the site for c.10 years, and yet no further applications have been submitted since those permissions were granted.

Q4. 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?

1.8 A significant amount of work is required to allow delivery to commence across East Norwich and a range of outstanding constraints which need to be addressed, as per our response to Q1 above. This includes:

- 1 The Carrow Works site – this is not subject to a current planning application however the Statement of Common Ground from Fuel Properties (D2.3) indicates that an application is currently being prepared. This site will require preparation works including any remediation work and the demolition of existing structures. It may also require additional access points to be created, although the exact extent of this work is unknown absent any work by the GNPD or a submitted planning application. Indeed there is also a lack of evidence to show that the local highway network is able to absorb the scale of development envisaged at Carrow Works; the plan does not appear to be supported by a transport assessment which would show this is the case. The site is also subject to heritage constraints notably the Grade I listed Carrow Abbey, as well as the other constraints which affect this and other parts of East Norwich (biodiversity, flooding, pollution, etc) which we set out in our response to Q1 above.
- 2 The Deal Ground site – while this site is the subject of an outline application dating from 2012, that application (and the subsequent SALP, adopted in 2014) highlight that a significant amount of infrastructure work is needed to unlock the site (see our response to Q1 and Q3 above), including new roads, bridges, and pedestrian/cycle access. It also subject to numerous environmental constraints, including biodiversity and flooding, which will need to be addressed before any development can come forward.
- 3 The Utilities site – this site is potentially the most constrained (and therefore least likely to come forward) of all the East Norwich site, owing to the fact that it is entirely inaccessible at present and will not become accessible until new bridges and road links are built. It is also in very close proximity to the various railway depots and maintenance centres which, as raised in the Network Rail Statement of Common Ground (D2.4), creates extensive noise and dust pollution which may be incompatible with residential (and other) uses. These constraints could reduce the amount of

development which could be accommodated on the site or mean the site is unsuitable entirely.

- 1.9 The impact of these infrastructure requirements and site constraints on deliverability and total likely yield is set out in our response to Q1 above and in our response to Matter 3 Issue 1 Q1. In summary, a significant amount of work needs to be undertaken across East Norwich and on some parts of the sites this work might not even be feasible, meaning they will not deliver any housing in the plan period. The likely yield will be substantially lower than assumed by the GNDP (we set out our revised trajectory, including for East Norwich, in our response to Matter 2 Issue 2 Q6).

Q5. 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?

- 1.10 For the reasons set out in our response to Q2 above, we do not consider the evidence supports the assertion that homes will be completed on the site in 2024/25. There is no evidence from the GNDP on when commencement is expected, particularly given that no part of the site is subject to an application which allows for development to commence (either reserved matters or a full application being granted). A key stage that will have to be met for the first dwelling to be delivered in East Norwich will be opening up works associated with the Carrow Works site (which, based on the Statements of Common Ground, appears to be the site on which most progress has been made on preparing a planning application) although there is no evidence on when this work is likely to occur given an application is yet to be submitted. Overall the evidence – either that prepared by the GNDP itself or by the various applicants/landowners – does not support this lead in time.

Q6. 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?

- 1.11 There is a lack of evidence generally that sites of this scale and nature in this local housing market can deliver 500 per year consistently, as set out in our response to Matter 3 Issue 1 Q1 (para 1.10-1.14). Not only is there a lack of wider evidence to support such high rates of delivery, but the local market for flats (which will be the main component of the East Norwich development) is notably flat and has been since the recession. This raises serious questions as to the ability of the local market to absorb the proposed product at a rate of up to 500 per year.
- 1.12 It is unclear what assumptions the GNDP has made regarding infrastructure delivery, site assembly, and lead-in times have been made; at present the GNDP is only at 'Concept Masterplan' stage and so does not have a clear, confirmed masterplan upon which to base such assumptions.

Q7. 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?

- 1.13 Because the site faces significant and potentially insurmountable deliverability issues, this policy is not 'sound' as required by para 35 of the NPPF because it is not effective (because it is not deliverable). The policy sets out the various requirements for development on the site, but is not supported by evidence that shows this is feasible and deliverable.

Q8. Does the Policy effectively ensure the protection and enhancement of heritage and other assets on or close to the site?

- 1.14 The policy seeks to address these issues this via an area-wide masterplan which includes, inter alia, protecting and enhancing the sites' and wider city's rich heritage assets and their settings. However, at this stage there is a lack of evidence/technical work to illustrate that development of the East Norwich site is even feasible, taking into account its heritage (and many other) constraints.

Q9. 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?

- 1.15 The policy is not clear how sustainable transport options will be maximised, aside from a reference in the supporting text (2.10 (ii)) which refers to a 'low car' environment being promoted. If this is the GNDP's objective, evidence will need to be prepared on how this will be achieved both on-site and off-site (i.e. how the site links to other networks to allow people to move in/around the city via sustainable modes to their place of work, leisure and other areas).

Q10. 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?

- 1.16 This is not clear from either the Statements of Common Ground submitted by the various stakeholders (D2.2/3/4) nor any evidence from the GNDP submitted to the examination.