

Thursday 10 February - Matter 8 Strategic Growth Areas Allocations

Issue 1 - East Norwich Strategic Regeneration Area

Green Party response:

The following is a response from Thorpe Hamlet ward councillors

Our view is formed through our role as ward councillors, with the emphasis on local knowledge, impacts and feedback, rather than technical specialists.

Residents' concerns are not on the principle of development but the scale, and the impacts of the infrastructure on surrounding areas, notably schools, surgeries and traffic.

Issue 1 East Norwich Strategic Regeneration Area

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

More important than the exact numbers is the need for any new urban quarter to live up to the commitments [in Regulation 19 consultation, Part 2 – The Sites, East Norwich](#), para 2.8:

to a [high density] sustainable mixed-use community, co-ordinate delivery of new transport infrastructure and services, enhance green spaces and links, provide for a local energy network, enhance heritage assets, protect Carrow Abbey County Wildlife Site and address local issues including the active railway, the protected minerals railhead and flood risk issues. This has been shown in the Masterplan consultations:

file:///C:/Users/Home/AppData/Local/Temp/Sg1_Survey.pdf where the **top 3 public priorities were biodiversity, heritage and sustainable travel**

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?

We note the need for socially rented homes and consider the 33% requirement to be positive, justified, effective and consistent. Their delivery will be assisted by transparent viability assessments. Norwich City Council agreed in a motion in September 2017 that independent scrutiny of viability assessments should be a normal requirement, to help secure the delivery of affordable housing.

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

We believe the site is available, but the viability is less clearcut.

We believe that the flood risk from climate induced sea level rise has not been sufficiently taken into account, and that the assumptions about 100 and 1000 year events are in urgent need of revision.

The latest [State of the UK Climate](https://www.metoffice.gov.uk/research/climate/understanding-climate/uk-and-global-extreme-events-heavy-rainfall-and-floods) report indicates the UK has become wetter over the last few decades, although with significant annual variation. 2011-2020 was 9% wetter than 1961-1990. <https://www.metoffice.gov.uk/research/climate/understanding-climate/uk-and-global-extreme-events-heavy-rainfall-and-floods>

Climate Central mapping shows a high risk of annual flooding by 2040, based on current pollution trajectory, medium luck and including sea level and other flood risk. **This undermines the viability of the site.**

Land projected to be below annual flood level in 2040 is shown here: <https://coastal.climatecentral.org/mapview/14/1.3297/52.6074/96a4925de7d884734712181c0631fe2ae7dd21aad8f7e30b780cc227bf2aba57> via @ClimateCentral

Given the flood risk, how will homeowners obtain **insurance** against flooding?

Flood Re is a joint initiative between the Government and insurers that was developed precisely because residents in flood prone properties were unable to secure insurance for homes at risk of flooding. Its aim is to make the flood cover part of household insurance policies available and more affordable to residents. The Flood Re scheme is designed to help people who buy the buildings or contents insurance for properties which are at risk of flooding, providing they own and live in them. **However, homeowners are only eligible if the property was built before January 1st 2009.** Developers may be able to arrange initial insurance to the first buyers but there is no guarantee that subsequent homeowners will be able to secure flood insurance. As the years roll by it will be less likely they will be able to secure suitable insurance and if they are able to secure insurance then premiums are likely to be extremely high making properties highly undesirable in the future.

The difficulty of obtaining adequate flood insurance further undermines the viability of the site.

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?

There is much to be learned from the Dutch, before rather than after building 4 000 new homes. <https://nationalfloodservices.com/blog/what-we-can-learn-from-flood-control-in-the-netherlands/> The restraints of the site would be likely to yield low profit for any developer, and it would be likely that central government financing would need to be released in order for the development to be realised.

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?

A clear community engagement strategy and the human resources required to deliver the strategy on the ground has not been developed. It is essential to have a clearly defined engagement strategy which includes appropriate timeframes for effective engagement and consultation. Community engagement requires trained, skilled practitioners. The 100 homes can only be delivered on site following such an engagement but without a clear strategy, and sufficient skilled human resources allocated, then it is not possible to estimate if the delivery period is reasonable and realistic.

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?

The above comment on community engagement also applies to this question as the following issues demonstrate.

Previous planning permissions for the Deal Ground have required that a pedestrian/cycle route be provided between Whitlingham and Thorpe before housing is occupied.

Providing this and other vital infrastructure first is seen as essential by many new and existing residents, even if it causes delays to the delivery of the development. Active travel and public transport options are needed to avoid exacerbating traffic problems at the County Hall roundabout. Additional GP surgeries, dentists and schools will prevent overwhelming local NHS facilities, and potential conflict over the insufficiency of school places.

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?

R10 appears to need updating in the light of opportunities in the rest of the Norwich East, and of worsening climate, flood and biodiversity predictions. The requirement for a minimum 100 homes on the Utility site is subject to comments above on flooding. This constraint applies to all flood prone sites, most notably here, The Deal Ground.

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

There is much to commend here. We note that heritage is both natural and built, and that the effectiveness of said policy depends on robust implementation.

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?

Air quality in this area, due to car traffic, is already very poor. Clean, sustainable transport in this area will be key to creating a good quality of life for new and existing residents, because the area with is affected by heavy traffic on the A47, Bracondale and Carrow Road. It is unsurprising that nearby residents fear the impact of traffic from 4 000 homes and 6 000 jobs - only a very low car neighbourhood would in any way alleviate these well-founded fears.

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?

We are not in a position to answer delivery questions. We can say however, that nearby residents are excited about a walking and cycling link from Thorpe to Whitlingham Lane, and its early delivery will increase their tolerance to other construction issues.