
Matter 8 – Strategic growth area allocations

Issue 1: East Norwich Strategic Regeneration Area (ENSRA) (Revised policy 7.1)

Q1: “The work undertaken for the stage 2 illustrative masterplan indicates that the capacity of the site should be reduced to 3,362 from the 4,000 identified in the submitted plan. Is this capacity justified by the evidence and does it adequately reflect the site constraints?”

Q2: “Is it justified to assume that the development of the site will be completed before the end of the plan period? Are the assumed lead-in times, annual delivery rates and phasing assumptions for each part of the site robust?”

Q3: “Does the evidence suggest that the delivery of the site, along with the proposed supporting infrastructure, is viable?”

Q4: “Does policy GNLP0360/3053/R10, including the suggested modifications proposed by the Partnership, provide an effective framework for the delivery of the East Norwich Strategic Regeneration Area?”

- 1.1 Our previous representations on Matter 8 submitted on 10 January 2022 raised concerns that the Partnership had failed to produce evidence sufficient to satisfy the Inspectors that the ENSRA would be able to deliver within the plan period the number of dwellings envisaged and on the trajectory suggested. We noted that, by the Partnership's own admission, the 4,000 dwellings referred to in the submitted plan had, with further refinement in the Stage 1 masterplan [Doc D1.4N and D1.4O] already been reduced by 531 to 3,469 units.
- 1.2 We now learn from the Partnership's revised policy 7.1 [Doc F2.4] that the number has been further reduced to 3,362.
- 1.3 We understand from paragraph 334 of the revised policy text that the previously proposed masterplan will now be replaced by a Supplementary Planning Document (SPD) with its purpose being to “*inform implementation of this strategy and, alongside an infrastructure delivery plan and phasing plans will establish a framework for assisting with unlocking the development opportunities and a framework for securing funding for the delivery of infrastructure, where needed such as bridges and marinas.*”
- 1.4 The revised words of the policy text appear to support the view that there remains a substantial amount of evidence still to be collected and collated sufficient to justify the allocation and its effective delivery in the plan period.
- 1.5 The revised wording confirms substantial reliance on a SPD to be prepared and used as a vehicle to coordinate, unlock and secure funding for necessary infrastructure. If countenanced as an acceptable mechanism in this case, reliance on a SPD to be prepared in the future and to cover such fundamental issues such as funding for major infrastructure, avoids the identification and examination now of any effective solutions to key and substantial constraints. In our submission, these unresolved issues continue to cast considerable doubt on the delivery of the proposed development within the plan period and fail to demonstrate that the allocation is deliverable over the plan period and thereby in accordance with paragraph 35 of the NPPF.
- 1.6 We also note that the revised policy and explanatory text makes no mention of the newly introduced further constraint and requirement for plans to be certain that its policies will not have an adverse impact on the integrity of relevant habitat sites through increased nutrient emissions. We understand that the Inspectors propose to discuss this matter at a later session.



- 1.7 Considerable doubts therefore remain that this major strategic regeneration area, which forms an essential part of delivering the plan's identified housing requirements will be deliverable either in whole or in part within the plan period. These doubts are not assuaged in any way by the revised policy 7.1 [Doc F2.4], the supplementary statement of common ground with Homes England [Doc D4.10] or any other evidence (in particular Docs B30.1 to B30.8).

2 **Recommended remedy**

- 2.1 The revised policy 7.1 and the explanatory text emphasise further our previously stated concerns. Our suggested remedy therefore remains the same. The challenges of delivery facing the ENSRA, together with challenges on other sites elsewhere in the plan, confirm the need to recognise the requirements to identify additional sites for allocation, increase the number and range of contingency sites or both. Such a remedy would give confidence that despite the outstanding concerns over the delivery of the ENSRA, the plan is effective, justified and sound.