

Greater Norwich Local Plan EIP Hearing Statement

Matter 8 Strategic Growth Areas Allocations

Issue 1: East Norwich Strategic Regeneration Area

June 2022

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1. Introduction

- 1.1 This Hearing Statement is prepared on behalf of Fuel Properties (Norwich) Ltd (herein referred to as Fuel within this representation).
- 1.2 It is highlighted to the Inspectors that Turley has replaced Iceni Projects Limited, as planning representative for Fuel. Turley as authors of this Hearing Statement intend to rely on relevant evidence and representations previously submitted by Iceni Projects Limited to the various Regulatory stages of the emerging Greater Norwich local Plan, including providing previously submitted background within this Hearing Statement for the purposes of the matter in question.
- 1.3 Fuel is progressing matters for the Carrow Works site towards a hybrid (part full, part outline) planning application for submission in July 2022, proposing as it does, the comprehensive redevelopment of the brownfield site that lies within the East Norwich Strategic Regeneration Area.
- 1.4 The site is awaiting comprehensive redevelopment and has been proposed for mixed-use residential-led redevelopment in the Regulation 19 Local Plan. The Fuel site is considered an important component of the wider East Norwich Strategic Regeneration Area, which was proposing an allocation for 4,000 new homes and 6,000 new jobs at Policy 7.1 as drafted at that time.
- 1.5 Further to the Matter 8, Issue 1 Hearing that took place in early 2022, the Council/s has revised the housing delivery and jobs number to 3,362 and 4,100 respectively.
- 1.6 In addition to the identification of the East Norwich Strategic Regeneration Area under Policy 7.1, the draft Plan continues to specifically allocate the Carrow Works as an allocation site for residential-led mixed-use redevelopment under Policy/Allocation Ref: GNLPO360/3053/R10. This allocation extends to 19.91 hectares as it includes the Carrow House site, (including the Conservatory and car park), owned as it is by Norwich City Council.
- 1.7 It is highlighted that the hybrid planning application does not include the Carrow House site.
- 1.8 Whilst the allocation continues to provide a suite of key site criteria for the East Norwich Strategic Regeneration Area, these are now enshrined, in some detail, within the draft East Norwich Masterplan, Supplementary Planning Document (SPD), May 2022, which has been endorsed by the City Council's Cabinet (8th June 2022).
- 1.9 It is understood that the draft SPD will be the subject of public consultation towards the end of 2022, with adoption expected in tandem with the emerging Greater Norwich Local Plan.
- 1.10 The Carrow Works site has a unique history, dating back to the 12th century. Given this, there are a number of heritage assets across the site, including a Scheduled Monument, which cumulatively, reduce the scope for change in some areas of the site,

especially in respect of densities and the abnormal costs generated to the development.

- 1.11 This has been the subject of extensive pre-application consultation with the relevant stakeholders, including Historic England.
- 1.12 The above notwithstanding, and as shown in the emerging SPD, there remains considerable scope to deliver high-quality, high-density development in other areas of the site.

Statement of Common Ground

- 1.13 A Statement of Common Ground has been agreed with the Partnership, seeking as it does to clarify contextual elements surrounding heritage assets on the Carrow Works (Fuel) site and to ensure the requisite cross-references to Policy 5 regarding viability considerations and to clarify the role of the SPD in shaping the scheme.

2. Matter 8 Strategic Growth Areas Allocations

Issue 1: East Norwich Strategic Regeneration Area

- 2.1 This section seeks to respond to the Inspector's four questions, as set out below.
- 2.2 Firstly, it is reiterated that Fuel continues to support the strategy for the East Norwich Strategic Regeneration Area as set out in Policy 7.1. Optimising the sites that form part of the area, especially given their previously developed/brownfield nature, should be fully maximised for housing and other complimentary land uses.

Matter 8, Issue 1 Inspector's Questions.

Question 1. 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 the capacity justified by the evidence and does it adequately reflect the site constraints?

- 2.3 The revised Policy 7.1 wording for the East Norwich Strategic Regeneration Area stipulates a reduced housing capacity to 3,626 and identifies that the Carrow Works site (including the Carrow House site) will deliver 1,692 homes (paragraph 2.24).
- 2.4 The East Norwich Strategic Regeneration Area comprises four sites as follows:
- a. Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (the 'Deal Ground');
 - b. Land at Carrow Works site (the Fuel site), the Carrow House site (Norwich City Council;
 - c. Utilities site; and
 - d. Land in front of ATB Laurence Scott.
- 2.5 A hybrid planning application for the Carrow Works site (which excludes Carrow House) is at advanced stages of preparation and is due for submission in early July 2022 following extensive pre-application consultation with key stakeholders, including representatives from the City Council, Historic England, Lead Local Flood Authority and the Highway Authority.
- 2.6 The scheme has continued to evolve throughout this process, especially in response to heritage and highways feedback.
- 2.7 The hybrid planning application is therefore proposing 1,856 homes, alongside a range of other uses on the Carrow Works site. This capacity is reflective of the site constraints identified in Section 1, and has been the subject of a host of technical and environmental assessments informing and supporting the hybrid planning application,

proposals. At the same time, Fuel has sought to ensure that the proposals have regard to the general thrust of Policy 7.1 and the emerging SPD.

- 2.8 Whereas the site forms part of the Carrow Works site identified within the East Norwich Strategic Regeneration Area, it is not within Fuel's ownership, and as such, does not form part of the aforementioned hybrid planning application proposals.
- 2.9 Given the above context, Fuel continues to support the capacity proposed for the sites, and considers that the Carrow Works site can, as currently proposed, provide a healthy proportion of the capacity i.e. 1,856 homes.

Question 2. 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?

- 2.10 The development of the Carrow Works (Fuel site) can be substantially delivered by the end of the plan period. The statements made in the Icen Projects Matter 8 Issue 1 Hearing Statement of January 2022 (paragraph 3.5) still stand.
- 2.11 Since that time, Fuel Properties (Norwich) Ltd has progressed a hybrid planning application for submission in July 2022. The updated timeline for the hybrid planning application is set out in the table below and reflects the anticipated delay for determination caused by the nutrient neutrality issue, which following consultation with development management officers at Norwich City Council, may result in an 18-month delay in the determination of the hybrid planning application. The table also factors in timescales for site clearance and preparatory works.

Stage	Timelines
Hybrid Planning Application Submission	July 2022
Determination	Early 2024
Pre-development and Reserved Matters	Late 2024/ Early 2025
Commencement on Site (Site clearance/demolition/site preparation works)	Autumn/Winter 2025
First Delivery	Spring/Summer 2026

- 2.12 In parallel with the hybrid planning application process, detailed discussions between Fuel and Joint Venture partners have and continue to take place, culminating in the progression of a number of legal agreements, some of which have exchanged, with individual house builders and commercial operators, focusing on individual plots or character areas as shown in the emerging SPD and as proposed within the hybrid

planning application. This provides the opportunity for multiple points of delivery and ultimately sales, across the Carrow Works site.

- 2.13 The timeline for delivery is outlined in the table below, which will include a variety of different housing types and sizes.

Timeline	Residential Numbers
2025/2026	-
2026/2027	422
2027/2028	339
2028/2029	213
2029/2030	106
2031/2032	106
2034/2035	183
2036/2037	143
2037/2038	150
2038/2040	194
Total	1,856

Question 3. Does the evidence suggest that the delivery of the site, along with the proposed supporting infrastructure, is viable?

- 2.14 The evidence provided is seeking to demonstrate viability for all the sites that comprise the East Norwich Strategic Regeneration Area site (the 'site'), which is considered helpful.
- 2.15 The supporting infrastructure envisaged by the emerging SPD, and reflected within the policy, are helpful at a strategic level in showing that the wider masterplan area is deliverable and viable.
- 2.16 All individual sites, including Carrow Works (Fuel) will be the subject of their own viability testing as they come forward through the planning application determination process, and in line with viability considerations set out at Policy 5 of the emerging Local Plan.

Question 4. 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?

- 2.17 As highlighted above, a Statement of Common Ground has been agreed with the Partnership, which seeks some minor wording changes to Policy GNLP036083053/R10, focused on ensuring and clarifying the role of the SPD and that individual applications will be supported by their own detailed technical and environmental assessments. These assessments will in turn inform the development proposed on each site, including but not limited to key infrastructure, key linkages and height, scale and massing.
- 2.18 Alongside this, minor wording amendments have been agreed to reflect that each application will be the subject of its own viability considerations to ensure accordance with Policy 5 of the emerging Greater Norwich Local Plan.
- 2.19 On the above basis, Policy GNLP036083053/R10 is considered an effective framework for the delivery of regeneration area.

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