

Greater Norwich Local Plan Hearing Statement

Greater Norwich Partnership Response to Inspectors' Matters, Issues and Questions (July 2022 Sessions)

Matter 8 – Strategic Growth Areas Allocations

Issue 1 East Norwich Strategic Regeneration Area

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP). The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

www.gnlp.org.uk

The Councils have responded to each question directly in the body of the Hearing Statement.

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 this capacity justified by the evidence and does it adequately reflect the site constraints?

Response to Question 1

Overview of the Masterplan Process

1. The East Norwich Masterplan Stage 2, as outlined in summary in GNLP Examination Library Ref [B30.5](#) and in full in [B30.6](#), covers the entire site allocation at East Norwich (reference GNLP0360/3053/R10). In doing so, it includes proposals for the four principal development sites of the Carrow Works site, the May Gurney site, the Deal Ground site and the Utilities site.
2. All of these sites are constrained in some way and these constraints limit the amount of development that the sites can accommodate. Development proposals that come forward which do not take proper account of these constraints are unlikely to be considered a suitable form of development.
3. Analysis early on in the production of the masterplan was undertaken to help determine an assessment of the extent of developable land. This analysis phase of work took account of the following principal constraints:
 - Heritage buildings and structures to be retained
 - Operational land required for ongoing aggregate depot operations
 - Operational land required for ongoing rail operations
 - Woodland, TPO and designated open space land including the County Wildlife Site
 - Alignment of underground utilities
 - Flood Zone 3b, as functional floodplain.
4. The residual land beyond the composite area covered by each of these principal site constraints was considered to represent the net developable area. Whilst the determination of this net developable area was not the subject of more detailed testing such as flood, noise or any other form of environmental modelling, it was for the purposes of the strategic masterplan being prepared considered to be a useful basis on which to progress masterplan options.
5. This work was undertaken in September 2021 and initial layout and massing options began to be progressed. Urban layouts were designed to take account of likely street dimensions, back-to-back distances and the need for a range of forms of development in response to site conditions. Some locations have always been considered better suited to house-based forms of development such as the area immediately to the east of the Carrow Priory ruins and the area to the eastern extents of the Utilities site.
6. In order to assess development capacities, the buildings in the emerging masterplan were assigned land uses and building heights. This was done in discussions with the masterplan team. Avison Young provided advice on the land use distribution across the masterplan area informed by an assessment of the local property market. Allies and Morrison provided a view on the appropriate building heights which would make the best use of this important brownfield development opportunity whilst also respecting the need for massing to take account of nearby listed buildings and other heritage assets.

Assessment of infrastructure requirements

7. The Deal Ground and Utilities sites both have significant access issues and require new bridges to unlock them for development. The Deal Ground site will require a new all-modes road bridge across the River Yare between it and the May Gurney site. The Utilities site will require a new all-modes road bridge across the River Wensum between it and the Deal Ground site, with access to it also dependant on the access provided by the new bridge across the River Yare between the May Gurney and Deal Ground sites. These bridges are required because access by other means is considered to be unviable.
8. Access options dismissed quickly and early in the masterplan process included:
 - a. Access to the Deal Ground site via a new road bridge across the railway linking with the Carrow Works site. This was dismissed as almost certainly being prohibitively expensive given the height and spans that would be required. The very significant land take associated with such a structure would have reduced the already restricted area of developable land. There would also have been significant impacts on highly sensitive heritage assets across the Carrow Works site, including a Scheduled Monument and a Grade 1 Listed Building.
 - b. Very significant widening of the existing underpass connection between the Carrow Works and Deal Ground sites to establish a two-way road of sufficient height for emergency vehicles. This was dismissed earlier in the process given the complexities associated with Network Rail operations and ownership and potential impacts on the railway lines from Norwich to London and Cambridge, including the uncertainties associated with the Trowse Rail Bridge given the long-term aspirations to upgrade this section of line to twin track.
 - c. A new bridge connection over the railway providing direct road access to the Utilities site. Existing road access to the site is provided firstly via the route beneath the existing raised railway as it approaches the Trowse Rail Bridge and secondly via the single-track vehicular bridge structure connecting with Cremorne Lane. The latter structure is not part of the adopted highway and would fall short of adoptable highways standards. Upgrading this bridge would also generate traffic through an established residential area and would require significant land to ensure height clearance required for the railway.
9. Cost assessments of essential infrastructure have been made as outlined in the East Norwich Viability Report (GNLP Examination Library Reference [B30.2](#)) and the East Norwich Delivery Report ([B30.8](#)). A view has also been taken on an appropriate phasing strategy.

Refinements and revisions

10. Alongside the physical need for new bridges to gain access to the sites, perhaps the most significant constraints associated with the delivery of the masterplan are those relating to heritage and flooding.
11. The heritage constraints are significant given the status of the assets on site and the impact on them that new development might have. Given the scale of change being considered through the allocation, Historic England commissioned a listing review. This was carried out towards the end of 2021 and concluded early in 2022.

12. A number of upgrades to listed buildings have resulted, including some locally listed buildings being upgraded to listed buildings and, in the case of the Carrow House conservatory, a Grade II listed building being upgraded to Grade II*.
13. This listing review is extremely useful to improving our understanding of the site's heritage assets. The masterplan layout was reviewed and revised in light of this review, which had a limited impact on overall development capacity.
14. Separately funded by Homes England, some additional flood modelling which tested the implications of the emerging Stage 2 masterplan was undertaken. This provided a better understanding of the issues and implications of flood risk and new development.
15. Both of these important pieces of additional work have strengthened the evidence base supporting the masterplan. However, the draft SPD makes it clear that further work will be required on both of these fronts.
16. Further townscape and visual impact testing will be required to better understand the impact of new development on the setting of heritage assets. New flood modelling will be required to demonstrate flood risk has been assessed accordingly and mitigation measures are in place,

Capacity assessment

17. Specific decisions needed to be made on each building within the masterplan in terms of land uses and building heights in order to be able to confidently assess development capacities, from which a more generalised and flexible the approach to land uses and building heights emerges as is now expressed in the East Norwich Stage 2 Masterplan.
18. The masterplan process is iterative. More detailed work remains to be done in support of associated planning applications for parts of the site.
19. However, the following assessment has been made for the potential housing development capacity based on the current higher-level understanding of the constraints suitable for the plan making stage:

Zone/Use	NIA sqm	Percentage	Units
Carrow Works			
Residential Apartments	86,550	71%	1380
Residential Houses	35,649	29%	312
			1692
Deal Ground			
Residential Apartments	54,219	67%	864
Residential Houses	26,790	33%	234
			1099
May Gurney			
Residential Apartments	4,341	30%	69
Residential Houses	10,181	70%	89
			158
Utilities Site			
Residential Apartments	24,662	43%	393
Residential Houses	33,286	57%	291
			684
Grand Total	275,678	100%	3633

20. Note that reasonable assumptions have been made relating to building efficiencies in terms of their net to gross ratios, as follows:

GEA:GIA	0.95
GIA:NIA (Apartments)	0.80
GIA:NIA (Houses)	1.00
GIA:NIA (Podium)	1.00
GIA:NIA (School)	0.90
GIA:NIA (Employment)	0.80

21. Of the total site capacity 271 dwellings are within the Broads Authority area. These are all on the Utilities Site, reducing the capacity of this site within the GNLP area from 684 homes to 413 and the total capacity within the plan area from 3,633 to 3,362 dwellings.

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?

Response to Question 2

Lead in Times and Phasing

22. The starting point for the identified timing and phasing of delivery contained within the East Norwich Strategic Regeneration Area (ENSRA) has been to understand the current site conditions/position, preparatory works and the infrastructure needed for development to start. As set out in response to Question 1, a good understanding of the constraints and opportunities informed the framework masterplan and therefore helped to identify the interventions needed to make the sites deliverable.
23. The approach to lead-in and phasing has also been informed by the masterplan team's technical analysis, the subsequent Infrastructure Delivery Plan ([B30.7](#)) and the site-specific knowledge and understanding of each landowner and their development partners/advisors.
24. From that evidenced starting point, and drawing on the masterplan team's experience, initial timeframes for delivering the required package of works and infrastructure were prepared. This has resulted in the need for and timing of each intervention, and the development that flows from it, being based on a well evidenced foundation.
25. The package of works was linked to the sub-areas identified within the framework masterplan. This allowed the identification of areas which could be delivered relatively easily/quickly without the need for major infrastructure to come first, and those where fewer barriers existed and could therefore come forward sooner.
26. It is this relationship that informs the indicative phasing approach set out in the masterplan. To help illustrate this, two examples that lie at either end of the delivery spectrum are:
- a) May Gurney
As proven by the existing planning consent, this site requires no major infrastructure in order to be delivered. Whilst some site preparation is needed, and upgrades to the access arrangements are required, these are proportionate to the scale of development and therefore do not present a barrier to delivery. As such, the site is one of the early opportunities to deliver new homes and sits within Phase 1a of the indicative phasing schedule.
 - b) Utilities Site
The delivery and occupation of this site will be contingent on delivery of the Wensum Bridge (an all modes crossing from the Deal Ground). From a delivery trajectory perspective, the ENSRA masterplan has developed a 'mini-programme' for construction of the bridge. In line with assumptions in the previous HIF bid (submitted in 2017) and using the consultant team's experience, this is based on current levels of design/feasibility testing and the subsequent steps needed in the design and consenting process.

The HIF bid assumed that based on the outline consent in place for the bridge crossing that if HIF were awarded then infrastructure works would be complete in 2019, effectively suggesting a 2-year delivery period.

The ENSRA masterplan SPD ([B30.6](#)) extends this period to 5 years, taking the view that further feasibility work and a detailed consent would be required to reflect the nature of the 'all modes' bridge required in the Infrastructure Delivery Plan ([B30.7](#)), noting that the HIF bid was for a pedestrian/cycle bridge only. With a further two years then required to construct the first residential properties to the south-west of the Utilities site, it has been assumed the first homes completed/occupied in 2029, as set out in the East Norwich Delivery Justification Report ([B30.1](#)).

The landowners in particular consider this to be a conservative estimate of the lead in time for the Utilities site given construction on site could potentially be serviced via the existing access points (which were used for previous demolition and modest construction projects). This could allow sites to be 'ready' for when the bridge is open rather than following on from it – potentially bringing forward delivery by 2 years even without delivering the bridge earlier.

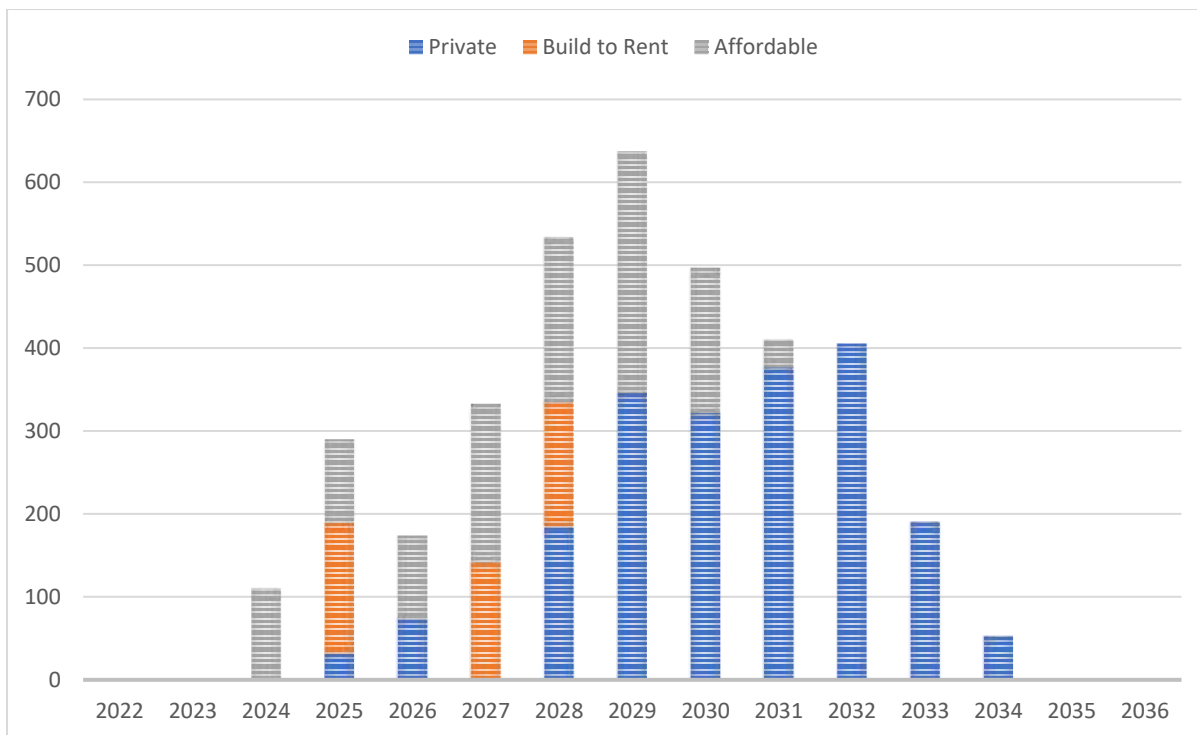
The above positions are set out in the East Norwich Masterplan SPD ([B30.6](#)) and the IDP ([B30.7](#)). The IDP identifies that the delivery of the Wensum Bridge is required ready to unlock the delivery of housing and commercial development across the Utilities site from 2030 onwards (given the IDP works in a series of 5-year phases post 2025). Therefore, the Utilities site is considered to be delivered in Phase 3a to 3c.

27. Overall, as set out in [B30.1](#), the start dates and delivery trajectories have been identified in partnership with the respective landowners for each component site within the ENSRA. Adjustments have been made throughout the process to reflect current understanding and thinking from landowners and therefore present a robust position at the point of publication.
28. It should be noted that the timeframes set out for housing completions across the ENSRA do not make an allowance for the current Nutrient Neutrality issue that is affecting a number of sites across the GNLP area. Given the focus being placed on addressing this issue by the GNLP team, it is likely that it will only impact the delivery quantum associated with the first two years of the ENSRA trajectory, potentially up to 400 homes (110 in 2024 and 290 in 2025). However, homes on the May Gurney site would not necessarily be impacted as they are already consented – reducing the level of homes impacted to c.320 homes.
29. As it is anticipated that delivery could complete before the end of the plan period, even if there is early slippage, there is some flex at the end of the period to deliver the remaining homes.

Annual Delivery Rates

30. As set out in the Delivery Justification Report ([B30.1](#)), year-on-year delivery rates across the plan period vary both in terms of total homes delivered and the mix of types, as shown below:

Figure 1 - Housing Delivery per Annum and Types



Source: Avison Young, Delivery Justification Report (B30.1), 2022

31. Delivery peaks in 2029 at 637 units, which is formed of delivery across three of the four sites. Carrow Works and the Deal Ground will be established as places by this point and will therefore be delivering significant private and affordable homes. The first affordable homes on the Utilities site will also be delivered in this year. As well as multiple sites being delivered the trajectory in [B30.1](#) also shows that within each site there will be a split between houses and apartments being delivered, which creates a broader market to support the higher rate of delivery.

32. Whilst the absolute numbers shown in the trajectory are important, in order to consider whether they are 'realistic' it is also important to take account of how these numbers are 'built up' in terms of the type, nature and tenure of the homes.

33. As set out in [B30.1](#), there are three key factors that support the overall number presented:

- The quantum of housing is split between houses and apartments at 25% houses and 75% flats. In any one year this allows the site to target two different markets, increasing the potential for higher sales rates. This will provide product differentiation to assist delivery.
- The ENSRA is formed of four distinctive character areas (see [B30.6](#), Section E), which will be reflected in the nature of the homes delivered in each. As such, the houses and flats delivered in "the Villages", for example, will differ from those in "Waterside East" in terms of design and setting. This will allow them to appeal to different markets and provide an increase in sales rates.
- The total is formed of a mix of affordable, build to rent and market sale homes allowing the concurrent delivery of homes in separate 'markets', meaning there is no internal competition on site. This could be articulated further with the affordable housing split between shared ownership and social rent, and the potential for the private sales units to include other forms of provision such as retirement living, extra care etc. to further widen demand and support delivery. These will be subject to later, more detailed, proposals at the planning application stage.

34. As with the phasing and lead in times the overall trajectory and site-specific assumptions have been reviewed and adjusted in light of landowner comments and perspectives. Each landowner has their own advisory support to bring forward their site-specific plans and has been confirmed that the approach in [B30.1](#) is broadly in line with their current thinking in terms of the overall quantum of delivery per annum and how this would be achieved over the plan period.
35. Document [B30.1](#) also presents information from other schemes across the city and the rates of delivery these have achieved based on information provided by the marketing agents. It should be noted that none of these schemes present the scale, quality or range of opportunities that are present within the ENSRA, which on its own has the opportunity to create its own 'sub-market' within the city. As such, delivery rates may be below what can be achieved within the ENSRA.
36. On average smaller schemes within the city deliver around 2 flats and 1 house per week for market sale, with affordable and other tenures delivered outside of this figure (in addition). These schemes are delivering simultaneously into the market, so city-wide rates are higher.
37. Equating these site-specific delivery rates to the four character areas within the ENSRA, the closest comparison that can be made suggests that the area could deliver 8 flats and 4 houses per week for market sale – a total of 12 homes per week.
38. The submitted trajectory for the ENSRA peaks at the delivery of eight market homes per week in 2032, with two-years delivery of seven units per week (2029 and 2031) and 2030 delivering six units. The rest of the period (a further five years) delivers between one and four units per week.
39. Based on this delivery rate, the assumed rate of delivery is in line with current market performance and, given the diversity of product, does not risk over-supply the market in any given year or overstating the delivery potential. Indeed, in the majority of years there would appear to be a reasonable level of headroom in the market that could support faster delivery.

Question 3

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

Response to Question 3

40. To develop an understanding of the viability of the ENSRA Avison Young have prepared the East Norwich Viability Report ([B30.2](#)). This draws on the viability testing and the accompanying Delivery Report that forms part of the ENSRA draft Masterplan SPD ([B30.8](#)).
41. It should be noted that, given how development is likely to be delivered and the relationship between infrastructure and development, the viability and delivery assessments account for the whole ENSRA area, including the small part of the Utilities Site that lies within the Broads Authority area.
42. As set out in [B30.2](#), the approach to testing viability aligns with the required methodology for policy assessment, and therefore is in line with guidance set out in the NPPF and by RICS. It has been prepared using industry standard appraisal software (Argus Developer) and a range of locally specific and industry standard input assumptions.
43. Costs have been provided by RPS in relation to both infrastructure and build cost estimates. These are set out in the RPS Cost Plan, which is an appendix to both [B30.8](#) and [B30.7](#). The justification for costs is set out in both the Cost Plan and the Record of Assumptions that supports the Infrastructure Delivery Plan ([B30.7](#)). Both have been reviewed by landowners and other partners in the East Norwich Partnership and agreed as a robust basis for the viability assessment.
44. The viability assessment seeks to establish the viability dynamics of the ENSRA proposals, based on policy compliant approaches to affordable housing and developer contributions (including CIL and GIRAMS) and using market-based assumptions to simulate how a developer would assess profitability and therefore the incentive to deliver.
45. Document [B30.8](#) reports the final results of the appraisal identifying that the baseline position results in a negative return when the Gross Development Value (GDV) is compared to the cost of delivering infrastructure and development equating to approximately -4%.
46. Whilst the ENSRA-wide result is negative, there are areas within it that are viable, principally those in which sites can be brought forward without the need for significant enabling works or infrastructure. This includes a number of sub-areas within the Carrow Works site, including locations to the north-west closest to the city centre and the south-east, closest to Bracondale. The rest of the Carrow Works site is also likely to be viable in market terms over the plan period. Both positions are supported by the landowner and their development partner, who are currently pursuing a planning application for the full site and have consistently promoted the early opportunity for delivery.
47. The other key site opportunity that is deliverable in the short term is the May Gurney site, which does not require significant enabling works or infrastructure. The site benefits from an existing consent which the site owner and their development partner are in the process of implementing.

48. Given the above, most notably the landowner position, these sites can be considered to be deliverable in NPPF terms. This is because they are available now, are identified as suitable locations for development now and have a realistic prospect of delivering housing in line with the trajectory within five years.
49. However, the key to realising the full potential of the ENSRA is to see all sites come forward in a coordinated way, with the timely delivery of infrastructure ensuring that homes and jobs are delivered on all sites within the plan period.
50. The viability assessment set out in [B30.8](#) models how the proposals could achieve a more commercially attractive return that would enable private sector delivery. In line with the approach on the majority of complex urban brownfield regeneration projects, it is recognised that this requires upfront public sector intervention. As such, the viability assessment has sought to understand the scale of intervention required.
51. In simple terms the project, as assessed at this point, would require c.£153 million of public sector grant to enable a 15% profit on GDV. This is a level which, given the nature of development, would be attractive to private sector developers.
52. Public sector intervention would enable the delivery of all of the required site-wide infrastructure. This is a common approach to brownfield regeneration which is consistent with how the Government and Homes England have intervened in locations such as York Central, Ebbsfleet Garden City, Bristol Temple Quarter, Milton Keynes East and Biggleswade.
53. The overall level of intervention is important to understand, however it also has to be considered in the context of what that intervention delivers. Based solely on the level of housing the whole ENSRA would deliver (3,632 homes), the grant would equate to £42,126 per home, but it would also achieve wider place-based and economic benefits. This is broadly in line with the levels of investment Homes England have made in other locations, which range from c.£130,000 / unit at Ebbsfleet Central (which also unlocks economic benefits from c.100,000 sqm of commercial space) to £19,000 / unit at Milton Keynes East (where no commercial/economic benefits are created).
54. As evidenced by the Supplementary Statement of Common Ground ([D4.10](#)), Homes England regards itself *“as a long term stakeholder in the East Norwich Partnership”* and has put in place a dedicated team from across its development, infrastructure and funding teams to support the partners in bringing the site forward.
55. Having been engaged throughout the process, Homes England are fully aware of both the opportunities and the delivery challenges. In relation to the ENSRA, Homes England state in [D4.10](#) that *“comparable current sites where the Agency is heavily involved include York Central and Bristol Temple Quarter”*.
56. Any funding would be subject to further testing and agreements, with Homes England committed to funding a Stage 3 financial modelling exercise over the Summer of 2022 to provide the basis for future funding business cases. Any future funding decisions will be greatly supported by the site allocation, as this increases the certainty of delivery.
57. Homes England are the key partner, but are not the only opportunity to support the existing private sector commitment to deliver with public support. The Delivery Report ([B30.8](#))

provides an analysis of a wide range of potential funding sources and demonstrates the strong alignment between the ENSRA proposals and the objectives of a range of public sector agencies both nationally and within Greater Norwich.

58. Whilst it is too early for funding applications to have been made and funds committed, it is evident that there are multiple opportunities for infrastructure, key sites or other works to be funded in whole or part by the public sector through co-investment with the private sector.
59. Locally there is the potential for the Greater Norwich Growth Board to invest alongside landowners and developers to ensure the timely delivery of infrastructure, as they have on other major housing sites across the GNLP area such as Long Stratton and the North-East Growth Triangle. Critically, the Board have been engaged throughout the process and are aware of the scale and nature of the investment opportunities, agreeing to continue to review opportunities as the work progresses.
60. It is clear that, at this point in time, there are challenges to the viability and deliverability of the ENSRA sites. However, it is also clear that these are not unusual or unexpected for a large, brownfield urban regeneration project. As with other similar sites across the country, the key to delivery is securing the upfront investment to create a platform for homes and jobs to be delivered, as well as building on the momentum that early viable parts of the ENSRA can create.
61. Overall, with the ongoing commitment of all landowners and their development partners to bringing forward all parts of the ENSRA, the stated long-term commitment of Homes England, the early engagement with other funders such as the Greater Norwich Growth Board, the increasing profile of the ENSRA with central Government and the multiple other funding and investment opportunities identified, there is more than a reasonable prospect of the entirety of the ENSRA being delivered within the plan period, in line with the trajectory identified. The range and extent of the public and stakeholder engagement over 2021 and 2022 also provides confidence that delivery can happen in the identified timeframes, further reinforcing the position that, in NPPF terms, the site is developable in the plan period.

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?

Response to Question 4

62. Both policy GNLP0360/3053/R10 and policy 7.1, as proposed to be redrafted (see [F2.3](#) for a “clean” version and [F2.4](#) for a track changed version), provide an effective framework for the delivery and proper planning of the East Norwich Strategic Regeneration Area (ENSRA). The plan’s explanatory text and policy make it clear that the strategic and site-specific policies must be read in conjunction with each other.
63. As requested by the Inspectors, the policy redrafting aims to clearly differentiate between the strategic overview which now forms part of policy 7.1 and more site-specific aims and requirements in the site allocation policy GNLP0360/3053/R10. The policy redrafting has removed duplication between the strategic and site-specific policies, provided greater clarity about site specific requirements, and reduced areas of potential conflict or confusion, all of which contribute to making it an effective framework for delivery.
64. The policy framework takes a comprehensive approach to the overall development of the sites. Policy 7.1 as redrafted provides the strategic policy framework by setting out the level of housing and employment growth to be achieved across the sites, and by requiring development to meet the site-wide and site-specific policy requirements set out in the site allocations policy in accordance with guidance in the Supplementary Planning Document (SPD) ([B 30.6](#)).
65. The Partnership is currently working with landowners/site promoters to identify any further updates which are required to the policy for additional clarification. Any such clarification will be submitted through Statements of Common Ground in advance of the July 6th hearings.
66. The site allocations policy GNLP0360/3053/R10 and explanatory text provide clarity about the key constraints and considerations affecting the sites’ development and acknowledge that unlocking the full development potential of the sites requires the provision of common infrastructure to serve the sites. The policy is split into site-wide and site-specific requirements to provide clarification about what development on each site will require, given that sites will come forward at different stages in the plan period to 2038, as evidenced in the East Norwich Delivery Justification Report ([B30.2](#) pp12-13).
67. The site-wide section of policy GNLP0360/3053/R10 requires development to take place in a comprehensive manner and seeks to ensure that individual proposals will not prejudice the delivery of other sites in the strategic regeneration area. The site-specific section of the policy focuses on requirements for the individual sites, particularly in relation to provision of key infrastructure. Each of the site-specific sections requires that key infrastructure will be delivered in accordance with phasing plans and trigger points to be set out in the SPD, discussed further below.

68. The role of the SPD is to provide guidance to inform and support the implementation of policies 7.1 and GNLP03060/3053/R10, and to ensure that growth is coordinated, overcomes local constraints and is well-designed. It will also act as a framework for securing funding for delivery of infrastructure where required. The SPD has been informed by [B30.7](#) the Infrastructure Delivery Plan (IDP), which was produced as part of the masterplan commission. The IDP sets out the physical and social infrastructure necessary to support the development of the East Norwich sites. This has in turn informed the infrastructure requirements in the redrafted policy. Policy 7.1 clarifies that the SPD will provide a framework for seeking new transport and social infrastructure, whilst GNLP03060/3053/R10 identifies site-specific infrastructure requirements.
69. Trigger points are not included in the site allocations policy as more detailed evidence needed to support them is not currently in place. Instead, phasing plans and trigger points for the provision of key infrastructure requirements are proposed to be included in the final SPD. It is considered that the SPD is a more appropriate location for trigger points in any case as this will provide greater flexibility to assist with implementation and an SPD can be updated to reflect changed circumstances more easily than a local plan policy. In addition, the definition of trigger points in the SPD will be further informed by work to be undertaken by Homes England (HE) during summer / autumn 2022.
70. HE has been a key member of the East Norwich Partnership since its inception and is now ramping up its resourcing support to assist the city council and the wider partnership in maintaining momentum on East Norwich. HE met with Norwich City Council and key landowners in May – June 2022 to assess its strategy for progressing a ‘stage 3’ exercise, following on from the successful completion of stages 1 and 2 of the East Norwich Masterplan, which was completed in June 2022.
71. This work will be funded by HE and will take the form of a detailed assessment of matters related to delivery including potential delivery mechanisms, timing and phasing of development, and triggers for delivery. It will also assess detailed viability and funding to assist with the delivery of key infrastructure and affordable housing.
72. For clarification, not all the infrastructure identified in the site-specific requirements within GNLP03060/3053/R10 will be funded by the landowner / developer of each site. The SPD and IDP acknowledge that significant public sector funding will be required to secure the comprehensive redevelopment of East Norwich and delivery of a locally distinctive, high quality and sustainable new community. Allocation of the ENSRA will significantly strengthen the case for public funding.
73. In addition, the explanatory text for redrafted policy 7.1 notes at paragraph 334 that, whilst the SPD, IDP and phasing plans will form the framework for bringing forward development at East Norwich, further in-depth assessment and studies will need to inform the decision-making process at the planning application stage, including for example a transport assessment, archaeological evaluation, detailed heritage impact assessment etc.
74. The explanatory text for policy GNLP03060/3053/R10 reflects this and notes at paragraph 2.9 that further infrastructure may be required beyond that which is identified in the SPD, and that this infrastructure and its phasing will need to be agreed through the planning applications process. The explanatory text at paragraph 2.10 specifically notes that the details of on and off-site highway infrastructure and phasing will need to be informed by a transport assessment in consultation with the Highway Authority.

75. The approach that is currently proposed be taken to identifying trigger points in the SPD is set out in the table in appendix 1 below.
76. Norwich City Council Cabinet, in June 2022 ([B30.3](#)), approved delegated authority to make further changes to the draft SPD prior to consultation. The draft SPD, containing phasing plans and trigger points, will be subject to statutory consultation, likely in late 2022 - early 2023, prior to its adoption alongside or just after the adoption of the GNLP, currently anticipated in Spring 2023.
77. The GNLP response to the Inspectors' Matters, Issues and Questions for East Norwich have been informed by discussions with the key landowners and Norfolk County Council as Highway Authority. As will be set out in further Statements of Common Ground, the response is also supported by the landowners of the East Norwich sites and demonstrates key stakeholders' commitment to regeneration of the ENSRA through continued partnership working.
78. HE has also confirmed in its February 2022 Statement of Common Ground ([D4.9](#)) with the Greater Norwich Partnership, and subsequent updates in the March 2022 Supplementary Statement of Common Ground ([D4.10](#)), its commitment to regeneration in East Norwich by creating a specific team of experts in long-term regeneration, masterplan, property financing and investment to work on its contribution to the ENSRA.
79. Finally, HE has committed to Stage 3 work to prepare the business case for potential future funding.

Appendix 1 Key infrastructure triggers for East Norwich sites

Proposed broad approach to be incorporated in the forthcoming Supplementary Planning Document updates

A. Carrow Works and House

Item	Infrastructure	Requirement	Possible Trigger for requirement	Comments / Rationale	East Norwich Draft SPD reference
A1.	East-west cycle/ pedestrian connectivity to connect access on King Street to link at Trowse rail underpass	Provision for and construction of by developer, and agreement about future maintenance / adoption	Prior to occupation of X% homes in riverside area of Carrow Works site	Part of key strategic objective within East Norwich Regeneration. Access can't be opened up through underpass until a) the underpass enhancement works are undertaken and b) some Deal Ground development has taken place and there is a safe route through the Deal Ground site (during remaining construction). However, LPA need to tie down completion of the Carrow Works part of the route to an appropriate timescale Definition of Riverside Area needed	Masterplan Concept Drawing p.52-53 – 3 p.66-67 M2
A2. (see B6)	Enhancement works to Trowse underpass	Unconstrained access and financial contribution to enable landowner or 3 rd party to undertake works, and agreement about future maintenance / adoption	Prior to occupation of X% homes in riverside area of Carrow Works site OR on completion of x% of property on Deal Ground, whichever is sooner	Key requirement as central critical part of Item A1 and B8. Similarly, no point in Underpass works being done too far in advance of connecting ped/cycle path either side. Funding package to be identified Network Rail approvals needed	Masterplan Concept Drawing p.52 – 53 – 11 p. 67, 70 M2 d

				Agreement re future adoption/maintenance with highway authority	
A3.	Cycle/pedestrian bridge over River Wensum (linking to Carrow Road)	Delivery of the bridge, and agreement regarding future maintenance / adoption	Prior to occupation of X% homes in riverside area of Carrow Works site	This is a key part of the sustainable Travel objective, enabling improved access to the station and parts of the city centre, as well as providing wider benefits. Agreement of Funding package needed	Masterplan Concept Drawing p.52-53 – 1 p.66 - 67 M2 a
A4.	Spine road loop	To be built to adoptable standard to enable public transport use	To be delivered before completion of X% of development adjacent to the spine road	To enable public transport provision to serve the entire E Norwich development	Shown in Masterplan Concept Drawing p52 - 53– unnumbered p.77, Bus Route p.75
A5.	A Second access to be provided to serve the development from King Street.	To be determined through the Transport Assessment	Trigger requirement to be determined through a transport assessment, potentially with an earlier trigger for cycle/pedestrian route to King St to encourage sustainable travel, and bus access requirement to be determined in agreement with bus operators	To be discussed with Highway Authority A permeable and resilient access strategy is fundamental. 2 points ensure that the site can be accessed should an incident occur and provides for a viable public transport route through the site.	Masterplan Concept Drawing p.52-53 – 2 p. 67,70 M2 b Bus route p.75
A6.	Off site improvements to highway network	Off-site walking, cycling, public transport and highway capacity enhancements as determined through the Transport Assessment	Evidenced through the Transport Assessment.	Highway Authority to advise during pre-app / Transport Assessment review	Outside Masterplan Concept Drawing p.52 - 53 p. 77

A7.	Safe and convenient off road cycle route connecting Martineau Lane Roundabout to King Street	As determined through the Transport Assessment	Evidenced through the Transport Assessment.	National Cycle Route 1 is substantially sub standard. Diverting across site offers significant benefits – to be assessed alongside E-W strategic route through Trowse underpass to Whitlingham Bridge being completed and determined by Highway Authority	Outside Masterplan Concept Drawing p.52 - 53
A8.	Provision of serviced site for 2FE Primary School	To the requirements of the Local Education Authority	Trigger to be determined by LEA (school opening when 500 homes in East Norwich completed has been mentioned)	Equitable apportionment of Infrastructure cost, for all Infra – particularly including the opportunity cost of the provision of land for a school – needs to be established	Illustrative Masterplan Drawing p.54-55 – G p. 95-97 p. 98 LU15
A9.	Provision of local health facility	To the requirements of the NHS/Clinical Care Group	To be determined by the NHS/CCG in coordination with County Council and Ipa	The facility would be East Norwich wide, there is evidence of a shortfall of capacity in the area for this new development. Equitable apportionment of Infrastructure cost to be established	Illustrative Masterplan Drawing p.54-55 – G p.103 Fig 36

B. May Gurney and Deal Ground

Item	Infrastructure	Requirement	Possible Trigger for requirement	Comments / Rationale	SPD Reference
B1.	New junction on Trowse Lane and Spine Road across May Gurney site capable of serving all development proposed on Deal Ground and Utilities Site	As determined through the Transport Assessment	Prior to occupation of homes on May Gurney		Masterplan Concept Drawing p. 52-53 - 3

B2.	Fixed all modes bridge over River Yare connecting May Gurney to Deal Ground	To adoptable highway standards	Prior to occupation of any property on Deal Ground	Cost and funding to be confirmed	Masterplan Concept Drawing p.52-53 – 9 p. 67,70 M2Ee (ped/cycle bridge)
B3.	Provision of spine road across Deal Ground to serve Utilities site	To adoptable highway standards	Prior to occupation of any property on Deal Ground site <u>OR</u> by agreement with owners of Utilities Site (reference existing Access Agreement L5507136-14, July 2013)	Riverside area, Deal Ground to be defined Funding package to be identified	Masterplan Concept Drawing p.52-53, (not numbered)
B4. (see C1.)	All modes bridge over River Wensum to Utilities Site and connected to adopted Deal Ground spine road	To adoptable highway standards	Prior to occupation of any property on the Deal Ground site <u>OR</u> by agreement with owners of Utilities Site (reference existing Access Agreement L5507136-14, July 2013). <u>OR</u> Required earlier if Trowse underpass enhanced route is not open	Riverside area Deal Ground to be defined Bridge not required solely to serve the development proposed, other benefits for wider population Funding package to be identified Equitable apportionment of Infrastructure cost to be established	Masterplan Concept Drawing p.52-53 - 14 M2 e p. 67, 70
B5.	Provision for high quality east-west cycle pedestrian connectivity to connect link under the railway at Trowse Bridge to Whitlingham Bridge	As determined through the Transport Assessment	Prior to occupation of any property in the Deal Ground site. (link connecting to King Street to be provided prior to occupation of any homes on Deal Ground	Riverside area, Deal Ground to be defined	Masterplan Concept Drawing p.52-53 – 3 p.66-67 M2

			unless bridge over Wensum and connection to riverside walk is provided)		
B6. (see A2.)	Enhancement Works to Trowse underpass		Prior to occupation of X% homes on Deal Ground (this should be aligned to commencement of development on the Carrow works or a % of homes on the Deal Ground – which ever is the sooner)	Riverside area Deal Ground to defined. Key requirement as central critical part of Item A1 and B8. Similarly, no point in Underpass works being done too far in advance of connecting ped/cycle path either side. Funding package to be identified Network Rail approvals needed Agreement re future adoption/maintenance with highway authority	Masterplan Concept Drawing p.52 – 53 – 11 p. 67, 70 M2 d
B7.	Fixed cycle/pedestrian bridge over River Yare to Whitlingham	Bridge to be provided to adoptable standards OR Land to be dedicated for the construction of the bridge.	Prior to occupation of homes in riverside area of Deal Ground	Bridge not required solely to serve the development proposed, significant benefits for wider population. Funding package to be identified Equitable apportionment of Infrastructure arises	Masterplan Concept Drawing p.52-53 - 16
B8.	Small marina facility	To improve recreational use and access to River Wensum, in collaboration with Broads Authority	<i>Prior to completion of homes in riverside area of Deal Ground site OR as agreed with Broads Authority (?)</i>	Riverside area of Deal Ground to be defined	Masterplan Concept Drawing p.52-53 – 13 OS10 k. p. 86
B9.	Provide unconstrained access and services to in line moorings downstream of new Wensum Bridge	To improve recreational use and access to River Wensum, in collaboration with Broads Authority	Prior to occupation of homes in riverside area of Deal Ground site	Riverside area of Deal Ground to be defined NB City Council ownership to be addressed/approvals sought	Masterplan Concept Drawing p.52-53 – 17 (generic indication)

C. Utilities Site

Item	Infrastructure	Requirement	Possible Trigger for requirement	Comments / Rationale	SPD Reference
C1. (see B4.)	Bridge over River Wensum connecting to Deal Ground spine road	Bridge to be provided to adoptable standards	Prior to occupation of homes on Deal Ground site <u>OR</u> by agreement with owners of Utilities Site (reference existing Access Agreement L5507136-14, July 2013). <u>OR</u> Required earlier if Trowse underpass enhanced route not open, whichever is the earliest	Riverside area Deal Ground to be defined Bridge not required solely to serve the development proposed, other benefits for wider population Funding package to be identified Equitable apportionment of Infrastructure cost to be established	Masterplan Concept Drawing p.52-53 - 14 M2 e p. 67, 70
C2.	Secondary/emergency vehicular and cycle/pedestrian access provision to Hardy Road and Cremorne Lane	To be determined through the Transport Assessment	Prior to occupation of X homes on Utilities Site Trigger to be evidenced through the Transport Assessment	Early liaison with highway authority needed. ATB Laurence Scott agree Emergency Access continuing, in principle. Weight limit (eg for fire truck) to be assessed for Cremorne Lane	M14 p.74
C3.	Cycle/ pedestrian route along River Wensum frontage of	To adoptable highway standards	Prior to occupation of X%		Hardy Road: Masterplan Concept

	Utilities site connecting to: a) Adopted riverside walkway to west of ATB Laurence Scott (Or Hardy Road); and b) Adopted highway on Cremorne Lane		homes on Utilities Site		Drawing p.52-53 - 20 Cremorne Lane: Masterplan Concept Drawing p.52-53 - 19
C4.	Construction of Large Leisure Marina	To specifications of Broads Authority and provision of connections to Wensum bridge	Prior to construction of River Wensum Bridge	Marina not required to serve development rather a requirement of wider placemaking and linked to provision of fixed bridges across Wensum Discussions needed with Broads Authority	Masterplan Concept Drawing p.52-53 – 18 OS11 p. 88
	Provide unconstrained access and services to in line moorings downstream of new Wensum Bridge	To specifications of Broads Authority	Prior to occupation of homes in riverside area of Utilities site	Riverside area of Utilities site to be defined. Need discussions with Broads Authority, provision would be on City Council owned stretch of river	Masterplan Concept Drawing p.52-53 – 17 (generic indication)

All

Provision for Management company(ies) for entire development providing for:

- Appropriate contribution towards management and maintenance costs of Whitlingham CP through additional use from East Norwich residents, visitors and wider accessibility

Additional Management requirements

Stewardship of nationally important heritage assets on Carrow Works – Listed Buildings, structures, elements and Scheduled Ancient Monument and all associated Grounds and Gardens (H8 p.62)

Management of County Wildlife Site, adjacent to Deal Ground (OS2 p.80)

Note

This Table relates to key Infrastructure items proposed in the Masterplan, all of which have a benefit of greater significance than just the host site itself. Elements needed as part of individual site development, in the normal course of development of that site (eg internal pedestrian connectivity, local open space etc) are not included in this Table.

