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Greater Norwich Projects Team
C/o Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2DH

Submitted by email: gnlp@norfolk.gov.uk

Dear Sir/Madam,

THE GREATER NORWICH LOCAL PLAN (GNLP) RESPONSE TO INSPECTOR'S MATTERS, ISSUES AND QUESTIONS (JULY 2022 SESSIONS) ON BEHALF OF NATIONAL GRID AND RWE UTILITIES SITE, CREMORNE LANE

We are instructed jointly by our clients, National Grid (NG) and RWE Generation UK plc (RWE), the landowners and joint promoters of the Utilities Site at Cremorne Lane, Norwich, to submit the following response to the Inspectors Matters, Issues and Questions. The response relates specifically to Matter 8 'Strategic Growth Areas Allocations' to be heard at the July 2022 hearing sessions of the examination of the Greater Norwich Local Plan.

The Matters, Issues and Questions are set out and responded to accordingly below.

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?

Draft Policy 7.1 and the East Norwich Regeneration Area Masterplan identifies that the development capacity of the Utilities Site is 684 residential units, with approximately 413 being within the GNLP area and 271 homes falling within the area covered by the Broads Local Plan.

The constraints of the site are well documented, and as a solution is progressed to secure funding for the necessary infrastructure to make the site accessible, it is our view that the number of dwellings currently allocated for the Utilities site is justified. Of course, the ambition of the landowners and future developers is to seek to maximise delivery whilst delivering a high quality proposal that is consistent with the wider allocation and contributes to the future growth of Norwich. This is in order to ensure that site specific abnormal costs, largely linked to the site's historic land uses, will not deter investment and can be absorbed by the developer in the future.

Overall, we consider that the projected housing numbers in respect of the Utilities Site can be delivered viably whilst overcoming site constraints. However, any future development proposals would be subject to additional capacity / viability testing at planning application stage.

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?

Extended collaboration with the Council and the subsequent formation of the Greater Norwich Partnership, along with the involvement of Homes England, provides a great platform for delivery of the site in the Plan period. This allows NG/RWE to either dispose of the site or form a JV partnership to deliver the development proposals/vision. Thus, the broad principles of the allocation are accepted.

Therefore, subject to further capacity testing and securing funding for the vital infrastructure (namely the primary link road and associated new bridges), and this then being put in place as a priority, NG/RWE are of the view that there are no hinderances that would jeopardise the development from being delivered within the plan period.

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

The site is subject to a number of previously identified constraints. It is expected/hoped that access and infrastructure constraints will be overcome via Homes England funding, which will drive the viability calculations to a positive figure. However, as already set out, there are further related constraints relating to the site's historic uses will need to be bolstered by a comprehensive suite of technical work which, along with future remediation costs, will have a further impact on development viability that will likely need to be met by the landowner/developer.

The Viability Report prepared by Avison Young assesses the viability of the site assuming the provision of 684 residential dwellings and 225,643 sq. ft. GIA of commercial floorspace. The viability testing has assumed a policy compliant delivery of 33% affordable housing based on Policy 4 of the Norwich Local Plan (2014).

The Viability Report's base appraisal results in a negative profit output, thus the quantum of public funding available and its ability to unlock development on the Utilities Site is essential.

Following a greater understanding of this, together with the site-specific constraints at the Utilities Site, a more targeted understanding of development viability, and the impacts this may have on delivery of the site, particularly the affordable housing provision, will be possible.

In the opinion of NG/RWE, the early delivery of the primary infrastructure and bridges has the benefit of accelerating delivery and is fundamental to the creation of the jobs linked to the proposed commercial floorspace envisaged for the Utilities Site. It is therefore essential to the outputs (principally, new employment and homes) of the Regeneration Area.

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?

Yes. The Policy outlines clearly the challenges and constraints faced by the Area. However, it sets out the necessary solutions to deliver the site within the Plan period. In respect of the Utilities Site, the requirements are deliverable and, subject to the identified public funding, should result in a viable development.

The ambition by the Partnership to deliver a high quality urban expansion across the Area is clear, and progress over recent months demonstrates commitment to deliver the proposals as quickly as possible. As such, NG/RWE support the policy framework as drafted.

Yours sincerely,



SAM HARPER
Director

cc Adrian Cross – NG

Matthew Trigg – RWE

Charles Whitworth – Cushman and Wakefield