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Greater Norwich Local Plan

Pre-Submission Draft Strategy

Iceni Projects Limited on behalf of
Fuel Properties (Norwich) Ltd

March 2021

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ON BEHALF OF FUEL
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Greater Norwich Local Plan
PRE-SUBMISSION DRAFT STRATEGY

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1. INTRODUCTION

- 1.1 On behalf of our client, Fuel Properties (Norwich) Ltd, we provide our comments on the Greater Norwich Plan Pre-Submission Draft Strategy (Regulation 19 Publication Stage), published for consultation in February 2021.
- 1.2 Fuel Properties (Norwich) Ltd are the developers of the Carrow Works site in east Norwich, which is identified in the emerging Greater Norwich Local Plan as being within the East Norwich Strategic Regeneration Area. The wider Regeneration Area has the potential to deliver some 4,000 new homes and 6,000 jobs, and will act as a catalyst for longer term regeneration of the wider area. The Carrow Works site comprises an important and substantial part of the East Norwich Strategic Regeneration Area and provides a significant opportunity to deliver growth for Norwich City the Greater Norwich area.
- 1.3 Our client welcomes the opportunity to provide comments on the emerging Greater Norwich Local Plan and to work collaboratively with the authority and key stakeholders as the plan progresses.

Carrow Works, Norwich

- 1.4 The land owned by our client comprises the former Carrow Works, identified in the Location Plan included at Appendix 1.
- 1.5 The site is located south east of Norwich City Centre and is approximately 16.9 ha in size. It lies immediately south of the River Wensum with the wooded ridge of Carrow / Richmond Hill rising abruptly to the west and forming a prominent natural feature in the Wensum Valley. The site itself slopes gently down to the north and east towards the rivers Yare and Wensum.
- 1.6 It comprises a number of employment-related buildings associated with the former Colman's factory and Britvic Soft Drinks plant. There are a variety of land uses surrounding the site, typical of an urban centre, including employment, commercial and residential which has resulted in a diverse range of building typologies and townscape features.
- 1.7 The Carrow Works site includes a number of Listed Buildings associated with the historic factory uses, as well as the Grade I Listed Carrow Abbey and Carrow Priory Scheduled Ancient Monument, and is partially within the Bracondale Conservation Area and an Area of Archaeological Interest, with numerous further heritage assets in the vicinity. An area adjacent to the river is also designated as Flood Zone 2/3.

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- 1.8 The A147 runs to the south, providing connections towards the City Centre as well as the wider arterial road network. This route is frequented by numerous bus services serving routes between the city centre and towns along the east coast. There are also many areas of open space in the vicinity of the site including the Whitlingham Country Park (which also incorporates a Local Nature Reserve) and The Broads National Park.
- 1.9 The former manufacturing site is sustainably located adjacent to the City Centre, and following the closure of the Britvic and Colman's operations there is a significant opportunity to reinvent this part of the City and accommodate a significant portion of the area's development needs. There is the potential to create a vibrant new residential quarter, building on the rich history of the Carrow Works.
- 1.10 Fuel Properties has been working closely with Norwich City Council to progress proposals for this site, which include over 2,000 new homes and 1,500 jobs. Work has commenced on the masterplan for the East Norwich Strategic Regeneration Area and it is anticipated that a planning application for the site will be submitted in early 2022.

2. REPRESENTATIONS ON THE PRE-SUBMISSION DRAFT STRATEGY

Policy 1 – The Sustainable Growth Strategy

- 2.1 We broadly support the overall quantum of development being planned for between 2018 and 2038, with the anticipated delivery of 49,492 new homes providing a reasonable buffer above the identified need of 40,550 homes.
- 2.2 We would however recommend that the policy clearly identifies the housing requirement against which delivery will be measured. Whilst the policy text identifies the housing need and the number of homes planned for, it is not clear what the housing requirement will be for the Plan period. Therefore we consider that Policy 1 should be amended to include explicit reference to the housing requirement, both for the 20 year Plan period as a whole and on an annualised basis.
- 2.3 In terms of the growth strategy identified in the policy, we support the intention to focus growth in the most sustainable locations, and particularly in the Norwich urban area. The redevelopment of the former Carrow Works site has the potential to deliver some 2,000 new homes towards the identified housing need for Greater Norwich, as well as employment space accommodating approximately 1,500 jobs, in a sustainable location to the southeast of the City Centre.

Policy 2 – Sustainable Communities

- 2.4 We support the aim of Policy 2 to promote sustainable communities and to ensure development is of a high quality and mitigates and adapts to climate change.
- 2.5 However, we are concerned that the current wording at Point 9 of the Policy is not sufficiently clear and would create uncertainty for developers and decision makers. In relation to water management and efficiency, the draft policy currently indicates that “if the potential to set more demanding standards [above Building Regulations Part G and BREEAM Very Good] locally is established by the Government, the highest potential standard will be applied in Greater Norwich.
- 2.6 In our view, the above wording does not provide sufficient certainty as to how development proposals should be assessed, as required by paragraph 16(d) of the NPPF, as it is currently unknown what future standards might be identified by Government. This would also generate significant uncertainty regarding the deliverability of development in Greater Norwich given any as-yet undefined future standards cannot be factored into the overall viability assessment supporting the Plan. As such, it is impossible to establish whether the requirement to meet any future standards would be viable or place an undue burden on developers in the local context and thus pose a risk to the delivery of development.

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- 2.7 In order to ensure the soundness of the policy, we therefore recommend that this sentence is deleted. In our view, any future standards that might be introduced by Government should be dealt with as part of a review of the Local Plan, when the relevant detail is available.
- 2.8 Furthermore, it is unclear how part iii of the policy relates to the requirements set out at Points 1-10 above. Given the second part of the policy (i-iv) seeks to set out measures to assist the approach identified in 1-10, the reference to delivery timescales does not directly relate to the requirements above which deal with sustainable and high quality development. We therefore recommend that this element be removed from the policy and dealt with elsewhere in the Plan if considered necessary. In terms of the general intention to ensure prompt delivery of a scheme, we support the broad intention to ensure developments progress in a timely manner, however we would emphasise the need for flexibility within delivery plans to acknowledge various risks and factors that may delay the delivery of a site beyond the control of a developer, and that there should be appropriate acknowledgement that any such plans are illustrative. This would not affect the Local Authority's legal powers including compulsory purchase.

Policy 3 – Environmental Protection and Enhancement

- 2.9 We support the aim of the policy to ensure development appropriately protects and has regard to both the historic and natural environment. The former Carrow Works site contains a number of heritage assets and is also within the setting of various other assets, and there is a significant opportunity to conserve and enhance these assets through an appropriately sympathetic redevelopment proposal.
- 2.10 In order to ensure the text of Policy 3 is compliant with national policy, we consider that the second bullet point under the historic environment section of the policy needs to be updated, to fully reflect the approach set out at paragraphs 193-197 of the NPPF. The current wording refers to all designated and non-designated heritage assets as a single group and indicates that harm should be avoided “unless there are overriding benefits”. We consider that this does not sufficiently reflect the approach advocated by the NPPF, which requires different levels of benefits and justification depending on the significance of the asset and the extent of harm generated. On the one hand, substantial harm or loss of the most significant assets should be wholly exceptional, whilst at the other end of the scale paragraph 197 of the NPPF indicates that the effect of development on the significance of a non-designated heritage asset should be “taken into account”, with a “balanced judgement” being made having regard to the scale of any harm or loss and the significance of the asset. We are concerned that the current policy wording suggests a need for “overriding benefits” regardless of the significance of an asset or the extent of harm, which would not be consistent with national policy. It is also unclear how “historic character” is defined and how this reference in the policy relates to terms used in the NPPF.

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- 2.11 In a similar way, we also recommend that the wording of the policy in relation to the natural environment is clarified. The reference to avoiding harm to all designated and non-designated natural assets unless there are “overriding benefits” conflicts with the indication later in the policy that regard will be given to the level of importance of the natural element. In order to ensure the policy is sound, we therefore recommend that this wording is clarified, with appropriate references to Chapter 15 of the NPPF.
- 2.12 In relation to the references to biodiversity net gain, it will be necessary to ensure that the final policy wording reflects the requirements set out in the Environment Act once this is enacted.

Policy 5 – Homes

- 2.13 We support the recognition within Policy 5 that brownfield sites are subject to particular costs and constraints and thus may not be able to provide the full portion of affordable housing generally expected by policy. In particular the cost of remediating contamination, delivering infrastructure and working with constraints such as heritage assets will need to be carefully assessed in relation to key regeneration opportunities such as the former Carrow Works site, with due consideration given to the level of affordable housing it would be viable to deliver whilst achieving the various other aims and policy requirements for the site. It is anticipated that further details on such matters will be provided through the masterplanning exercise currently being progressed for East Norwich Strategic Regeneration Area.
- 2.14 In relation to specialist accommodation, the former Carrow Works site has the potential to include an element of accommodation for older people, and the text of Policy 5 would support this provision. We would also recommend that other types of specialist accommodation are addressed in the policy, in particular purpose-built accommodation for rent (Build-to-Rent/ PRS). The 2017 SHMA indicates that the rate of increase of PRS has been significant in recent years, with 45% growth in Central Norfolk between 2001 and 2011. Accordingly, inclusion of reference to supporting the delivery of PRS/ Build-to-Rent development in Policy 5 would ensure sufficient provision is made for different elements of housing need within the market.

Policy 7 – Strategy for the Areas of Growth

- 2.15 We strongly support the identification of East Norwich as a key opportunity to create a new sustainable urban quarter for Norwich, which will act as a catalyst for additional regeneration in neighbouring urban areas and contribute significantly towards the growth of the Greater Norwich economy. Carrow Works forms an important element of the wider site allocation. The landowners and other partners in the East Norwich Partnership are progressing the area-wide masterplanning exercise to address the key planning issues and coordinate growth across the different sites.

2.16 In terms of the specific policy wording, we recommend it is clarified in the policy text that the figures provided in the table identifying the number of new homes and jobs allocated for each site are approximate. This is confirmed in the East Norwich section of the policy, which indicates that the area is allocated for “in the region of” 4,000 additional homes and “around” 6,000 jobs, however for clarity we consider that the table above should also indicate that the figures identified are approximate, and subject to further masterplanning work and assessment. This flexibility is important to ensure development makes efficient use of this sustainable site, and is not unduly constrained by the figures identified at this stage.

3. SUMMARY AND CONCLUSIONS

- 3.1 This document sets out our representations on the Greater Norwich Plan Pre-Submission Draft Strategy on behalf of our client, Fuel Properties (Norwich) Ltd. Our client is the developer for the land known as Carrow Works in east Norwich, which comprises a key part of the East Norwich Strategic Regeneration Area identified in the draft Plan. Fuel Properties are actively working to bring forward this site for residential and employment development, and it is anticipated that Carrow Works will deliver over 2,000 new homes and 1,500 jobs across the 17 ha site.
- 3.2 We strongly support the identification of Carrow Works as part of the East Norwich Strategic Regeneration Area in the draft Local Plan. We have set out above brief comments on the wording of Policies 1, 2, 3, 5 and 7 which we consider are necessary to ensure the soundness of the relevant policies, for the reasons discussed. We trust these comments and proposed amendments will be taken into account as the Plan progresses, and we welcome the opportunity to discuss these matters in further detail as required.

A1. SITE LOCATION PLAN

