

Greater Norwich Regulation 20 Scoping Consultation

Land adjoining and lying to the south of
Cremorne Lane, Norwich

Prepared by Fisher German LLP on behalf of National Gas
Transmission

Professional memberships and accreditations



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1. Introduction

- 1.1. These representations are prepared by Fisher German LLP on behalf of our client, National Gas Transmission ('NGT'), with respect to their land adjoining and lying to the south of Cremorne Lane, Norwich.



Figure 1: Site Boundary (Red outline denotes 'Land adjoining Cremorne Lane, Blue denotes 'Land south of Cremorne Lane')

Site Context

- 1.2. The site lies to the east of Norwich City Centre, where it spans both north and south of the Wherry Line railway. The larger, southern parcel is bound by the railway line to the north, the river Yare to the south, to the west is Crown Point depot and land which was formerly Norwich Power station, now largely disused save for a substation. The southern parcel of the site contains a number of existing structures which appear to form workshops. The remainder of the site appears to be brownfield/overgrown land not in active use.
- 1.3. The northern parcel is hardstanding which appears to be in open storage use. It also contains a ramp to access a bridge which connects the two parcels. There is a level grade crossing for the railway, but this appears to have been gated off and likely serves the National Rail operation. The northern parcel is enveloped by residential uses, including Salisbury Road to the west, Cremorne Lane to the north and the Sidings to the east.
- 1.4. The northern and southern parcels cumulatively were the subject of a Call for Sites submission, as well as a separate submission for just the northern parcel (Site ID: 26017). This was for the Greater Norwich Local Plan ('GNLP') Call for Sites exercise carried out earlier in 2026 wherein both submissions were promoted as suitable to accommodate residential, employment and other uses. Discussions have been held with Norwich City Council who have been exploring the potential use of the site for a district heating network – which would utilise the River Yare. Whilst this is at an early stage of consideration, our client is keen to work with the Council to explore suitable opportunities on site and to this end we consider the site represents a suitable regeneration opportunity able to accommodate a range of uses, including residential and employment.
- 1.5. The site spans two administrative areas; The Broads Authority to the east and Norwich City Council to the west.

- 1.6. The site is brownfield and despite being located adjacent to a river, it is largely not deemed to be at risk from flooding and sits predominantly in Flood Zone 1.
- 1.7. Neither parcel contains designated heritage assets, though it is acknowledged this area did play an important role in the development of Norwich, not least historically containing important power generation infrastructure.
- 1.8. The Greater Norwich Local Plan 2024 was adopted by the three constituent authorities, Norwich City, the Broadland District and South Norfolk in March 2024, making provision for 40,541 homes between 2018 and 2038, with circa 70% directed towards the Norwich Urban Area (NUA), surrounding settlements and growth locations. The Broads Authority adopted their Local Plan in 2019 and are currently in examination for their Local Plan Review.
- 1.9. The western extremity of the southern parcel forms part of a mixed-use allocation (the East Norwich Strategic Regeneration Area-ENSRA), where among a range of other uses, it is required to deliver over 3,000 dwellings under Policy STR.01 as part of a mixed-use development (see Figure 2 below). The Policy provides further information for each of the separate areas, including the Utilities Site which is the former power station and the western parcel of NGT's ownership outside of the Broads National Park, and Broads administrative area. This specifically requires "Effective integration with proposals for the area of the site immediately to the east falling within the Broads Authority area and covered by policy NOR1 of the adopted Broads Local Plan 2019 (or successor document)". As such, the entire site could be allocated as part of this Local Plan for comprehensive redevelopment.

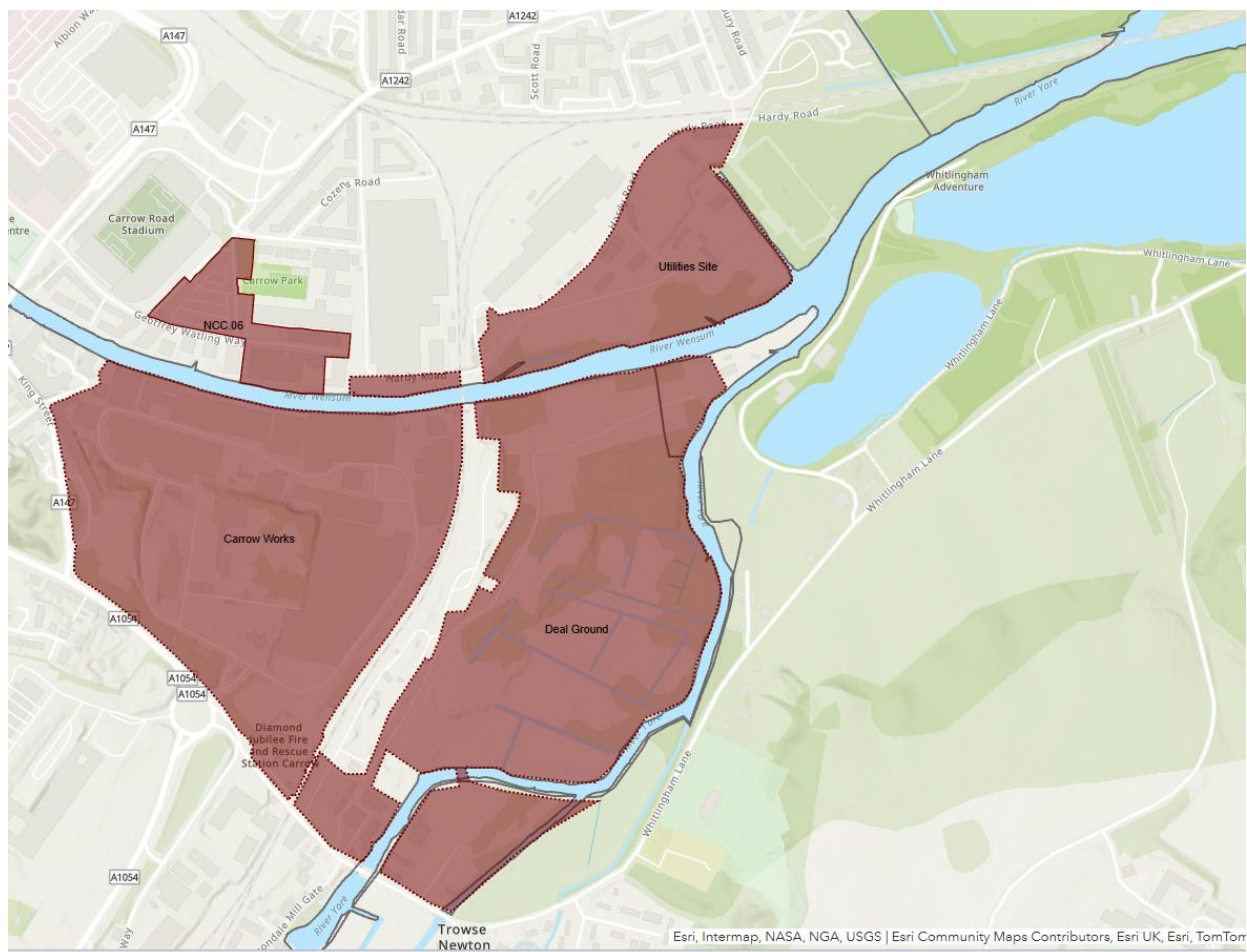


Figure 2: East Norwich Strategic Regeneration Area - Adopted Greater Norwich Local Plan

- 1.10. The Council have produced a document to guide delivery of the [East Norwich Regeneration Area](#), which shows how the area could be comprehensively delivered. This includes housing on land owned by NGT as shown on Figure 3 below.

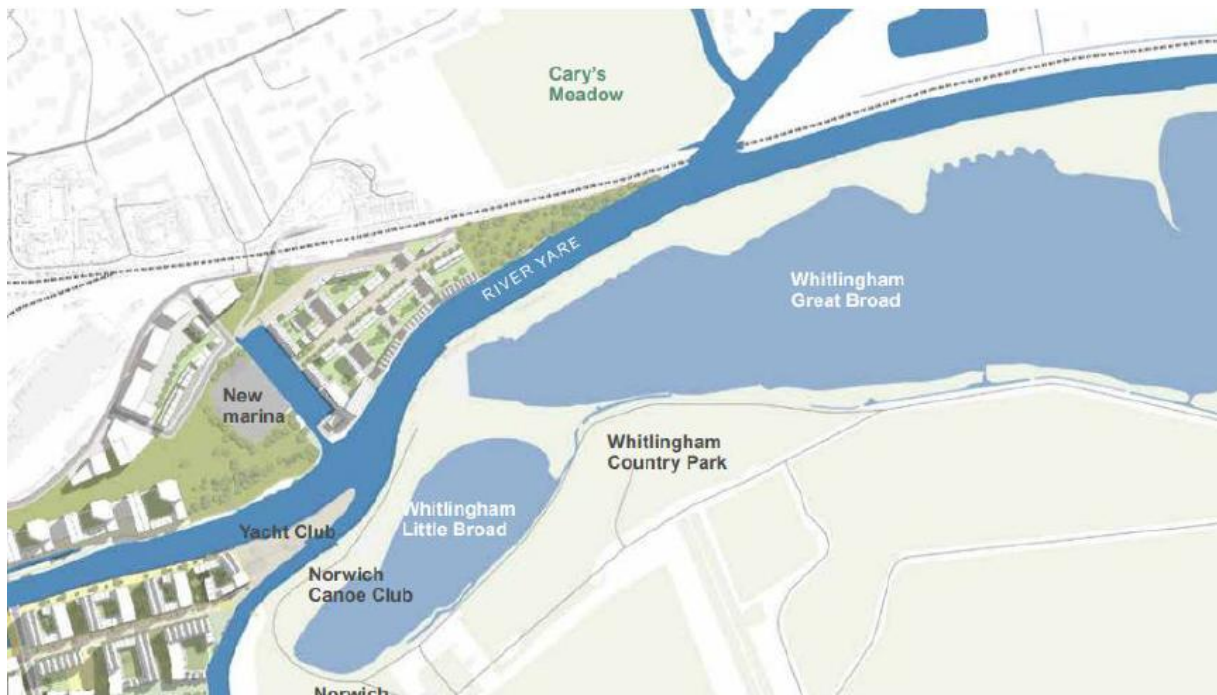


Figure 3: Extract from stages 1 & 2 Bridging Document

- 1.11. Whilst we acknowledge the role of this Scoping consultation is not to identify sites; we feel it important to reiterate on behalf of our client that the entire site – both the northern and southern parcels – is available for allocation and suitable for a range of uses. Our client is seeking to work proactively with the Greater Norwich Authorities to bring forward suitable development on an important brownfield site in an area with significant growth pressures and limited land supply. Whilst we consider that the site is able to accommodate residential and employment uses, our client is also supportive of exploring other uses on site to best help address the needs of the emerging GNLP.

2. Scoping Consultation

Question 1: Are there any other key Strengths, Weaknesses, Opportunities or Threats that should be included in the SWOT analysis for Greater Norwich? Why?

- 2.1. Accommodating the required growth across Greater Norwich represents a strategic challenge given the scale of housing and employment development required to support the area's long-term prosperity and ambitions. Additionally, the Government's changes to the NPPF mean that Local Planning Authorities (LPAs) across the country must plan for higher levels of growth and the housing need figure for Greater Norwich has risen by 34% from 1,929 homes to 2,590 homes per annum, presenting a real challenge for the area and one which will require significant work through this Plan.
- 2.2. In particular, growth must be focussed toward the most sustainable locations, such as Norwich, where access to jobs, services and public transport is greatest; yet opportunities for expansion are limited by environmental designations, flood risk considerations, competing land uses and the limited availability of suitable land. It will be critical that enough sites are identified in the right locations to accommodate levels of growth required, but it remains a significant threat which is not currently identified within the SWOT analysis.
- 2.3. There is a need to continue to direct strategic employment growth to locations in close proximity to existing population centres and rail stations, in accordance with the NPPF 2026. This approach will help ensure that there is limited reliance on long-distance commuting, supports modal shift away from the private car and maximises local access to employment opportunities for existing and future residents. Locating employment growth within and adjacent to population centres such as Norwich enables businesses – new and existing – to draw from a larger and more diverse labour pool, ensuring the long-term viability of businesses in the area and wider economic growth ambitions. It also ensures that existing businesses who wish to expand operations can do so where they are, without having to relocate due to a lack of available employment land or labour force.
- 2.4. With these points in mind, failure to provide sufficient opportunities for employment development in sustainable locations such as Norwich is likely to constrain investment, limit job creation and force businesses to relocate. Impacts on the local economy will have far reaching effects, including on wider GNLP ambitions and, in view of these points, failure to identify a sufficient supply of employment land in the right locations should be considered a significant threat which is currently not identified.
- 2.5. It is notable that the SWOT analysis identifies weaknesses relating to brownfield delivery. The starting position for the Council should be to exhaust brownfield land opportunities in accommodating growth before turning to other types of land including greenfield. Within the NPPF 2026 there is a stronger presumption in favour of brownfield development – particularly within settlements – where developments on brownfield land should in principle be approved with a higher threshold of 'substantial harm' to refuse them.
- 2.6. The new Local Plan should respond positively to this shift in emphasis and allocate brownfield sites for development as a priority. Ultimately, to increase the success rate of delivery on brownfield sites, the Council must ensure it identifies those which are located in the most sustainable locations and ensure policy asks are commensurate with the scale of constraints posed in redeveloping brownfield sites. Key to this will be the utilisation of available brownfield land promoted through the Call for Sites exercise and Scoping consultation, such as our client's land, in particular working with landowners to ensure development proposals are achievable and viable.
- 2.7. We agree that the co-location of infrastructure and housing around emerging economic clusters to create sustainable and desirable places is a significant opportunity for the GNLP to grasp. To fully engage with this and realistically achieve the desired outcomes, GNLP relies on the identification of sites which are sustainably located and well related to existing infrastructure, employment and housing provision.

Question 3 - Do you agree with the proposed broad structure of the GNLP 2045 above? If not, please suggest an alternative approach or approaches which could be taken to structuring the plan.

- 2.8. Yes. In particular it will be critical to explicitly set out the growth strategy and settlement hierarchy at the beginning of the GNLP to establish the broad foundations for growth. This should recognise the Norwich Urban Area (NUA) as the most sustainable location and focus for growth.

Question 4 - Which elements of the existing growth strategy and settlement hierarchy do you think have and have not worked well?

- 2.9. Focussing growth to the NUA is a well justified strategy but it is noted that it has fallen short of delivering on its housing target historically. We consider this is symptomatic of a lack of availability of suitable sites – with appropriate buffer – to accommodate it, rather than the strategy itself being flawed in principle.
- 2.10. Indeed, Norwich is by far the largest settlement across the GNLP development partnership area. It contains the highest concentration of services and infrastructure which can support commensurate levels of all types of growth. To continue to focus Growth toward the NUA represents an entirely sustainable strategy that should be maintained in the new GNLP.
- 2.11. In order to maximise growth in this area, Greater Norwich should look to the regeneration and intensification of brownfield sites first, following the ‘Brownfield first’ approach which is strengthened within the NPPF 2026. Indeed, the focussing of growth to the NUA will also support the city’s role as the economic ‘engine’ of the wider area, reinforcing existing employment clusters and infrastructure investment and reducing pressure for dispersed patterns of development across much less sustainable settlements across the hinterland. We also consider, therefore, that the intention to ‘maximise brownfield development and regeneration opportunities’ as set out at Paragraph 166 of the GNLP is justified and should remain as a fundamental component of any future strategy.

Question 5

- **How can the GNLP 2045 support the development of brownfield sites?**

- 2.12. The GNLP should maximise brownfield development and regeneration opportunities, which are mainly in Norwich, by adopting a ‘brownfield first’ approach to site allocation, in accordance with their existing growth strategy and objectives of the NPPF 2026 for the reasons explored above.
- 2.13. It is acknowledged that there are common additional hurdles to brownfield site delivery that do not equally apply to other land types. Brownfield sites can require significant public sector investment to de-risk them and they typically generate abnormal costs in terms of ground conditions, contamination and infrastructure. Brownfield sites are also frequently part of fragmented landholdings, making site assembly particularly complex and time consuming. Development on sites which are able to be assembled are often then constrained by neighbouring use conflicts, limitations in terms of access and a wide array of policy complexities associated with dynamic urban environments, not least enhanced design expectations.
- 2.14. All of these issues result in longer lead in and delivery timescales and increased associated costs and consequently, whilst brownfield land makes a critical contribution to sustainable growth and regeneration, successful redevelopment often requires a proactive approach to planning – including through the Local Plan system – and policy flexibility which adequately reflects the additional challenges associated with them.
- 2.15. Critically though, the GNLP must identify brownfield sites with realistic prospects of coming forward. Key to this will be the identification of sites led by proactive landowners who seek to engage positively with the Council, and sites where land assembly is simplified – ideally under a single title. Our client’s site as presented within these representations is such an example.

- What development types would you support as part of our updated Growth Strategy?

- 2.16. Brownfield intensification should be the prioritised development type in the growth strategy. This is because it represents a sustainable approach to accommodating growth by maximising the use of previously developed land within urban areas which supports urban regeneration, protects the countryside from unnecessary encroachment and makes best use of existing infrastructure and services associated with sustainable locations such as the NUA. As explored elsewhere within these representations, prioritising the use of urban brownfield land to accommodate growth promotes sustainable patterns of development – in particular housing and economic growth – with the added potential to reinforce Norwich's role as the regional economic centre.
- 2.17. In addition, mixed-use development that combines residential, employment, retail and other associated supporting uses should be sought where viable. Mixed use developments can deliver a wide range of social, economic and environmental benefits through the combination of land use types which complement and support one another, often resulting in vibrant and economically resilient places. The redevelopment of brownfield land for mixed-use development should be prioritised wherever possible, particularly where sites are located within or adjacent to existing urban areas and can benefit from established services, infrastructure and community facilities. This approach can maximise the efficient use of land, support urban regeneration objectives and help create sustainable communities where people can live, work and access day-to-day services in close proximity.

Question 6 - What areas do you consider to be appropriate for additional growth and what infrastructure, services and amenities would need to be prioritised to enable growth in these locations?

- 2.18. The most appropriate areas for additional growth have been identified in the Council's settlement hierarchy and include the NUA as a priority, followed by Main Towns and Key Service Centres, all of which contain the required amenities to serve growth proportionately, though the NUA is by far and away the most sustainable of these locations. In the creation of urban extensions, additional amenities, services and infrastructure will be required to serve the population increase, including transport networks, public facilities and utilities.

Question 7 – Should any changes be made to the settlement hierarchy through the new local plan? Please explain your reasons

- 2.19. The adopted GNLP Settlement Hierarchy remains the most sustainable approach and in principle it should remain as adopted. Growth should continue to be focussed to the NUA first including the settlement areas defined within it. Limitations on delivery within the NUA which have been observed does not undermine this principle and instead should be addressed directly through careful policy formulation recognising the challenges which face urban sites. Such policies will need to be framed around achieving realistic delivery, such as focussing on reducing the viability, infrastructure and delivery barriers often associated with urban sites.

Question 8 - What measures could the councils take to improve housing delivery rates through the local plan?

- 2.20. It is imperative that the Local Plan seeks to – as a minimum – address the Local Housing Needs for the GNLP area. The NPPF 2026 is clear on its expectations that local planning authorities will proactively plan – through the plan-led system – to address this and this stems from the NPPF's overarching objective of significantly boosting the supply of homes and supporting sustainable growth.
- 2.21. Central to achieving this and ultimately improving housing delivery rates through the local plan will be the allocation of enough deliverable housing land to maintain a realistic pipeline of sites rather than relying on a small number of very large allocations. This supply should include a significant enough buffer so as to bridge any gaps which emerge due to sites failing to come forward as planned. The supply should be formed of a

good mix of small, medium and strategic sites so as to provide a range of delivery routes and attract interest from the full spectrum of developers. Allocation policies should include a commensurate level of detail to provide clarity and certainty – including around phasing and infrastructure triggers - but equally enough flexibility to account for challenges in delivery which may emerge; this is particularly important where circumstances are relying on significant delivery within the NUA, given the known complexities around urban site delivery. The GNLP should include specific policies that recognise the challenges of delivering brownfield and urban sites, where they can provide specific additional flexibilities around issues such as design, density, mix and parking requirements.

2.22. Fundamentally, sites should be identified that are realistically deliverable and this should include a focus on identifying and allocating sites that have already been subject to allocation which have, by virtue of their status, already been subject to varying degrees of assessment and consultation.

Question 12 - How should the GNLP 2045:

- deliver the right types and mixes of flexible and adaptable commercial spaces in the right places?
- help our growth sectors to thrive, possibly including protection of site-specific industries?
- support other opportunities for economic growth, including the rural economy?
- strengthen skills and workforce development?
- plan for freight and logistics?
- support small businesses and start-ups?

2.23. To deliver on the above points raised in Question 12, the GNLP should prioritise allocation of employment land/ commercial spaces within and adjacent to key population centres such as Norwich, which is a sustainable location for growth and well-related to existing infrastructure, employment and housing provision.

2.24. Focussing economic growth to the NUA supports the city's role as the 'economic engine', reinforcing existing employment clusters and allowing businesses, including small businesses and start-ups, to draw from a larger and more diverse labour pool. This further strengthens and develops the workforce and facilitates growth, including in the key economic growth sectors identified by Greater Norwich in their scoping material.

Question 13 - How should the GNLP 2045:

- help strengthen the city, town, district and local centres?

2.25. To help strengthen the city, town, district and local centres, commensurate levels of growth should be apportioned within and in close proximity to each of them, with the city of Norwich and the NUA (including East Norwich Strategic Regeneration Area-ENSRA) being the key focus of growth.

2.26. As such, we consider that the broad growth strategy and settlement hierarchy promoted through the scoping consultation, as well as the existing retail hierarchy are the strongest mechanisms to achieve this; they are compliant with chapter 8 of the NPPF which sets out plan-making policies to promote the long-term vitality and viability of cities, towns, districts and local centres. ENSRA, where our client's site is broadly located, has the potential to create a new mixed-use sustainable urban quarter for Norwich and to contribute significantly to growth of the Greater Norwich economy, further strengthening the city and regeneration of the wider area. Ultimately, the Local Plan should be focussed on supporting Norwich in its role as a regional economic centre, and this is directly linked to the provision of enough employment and housing sites within the NUA to increase the vitality and maintain long term viability of the city centre retail area as well as emerging urban quarters. The identification of a suitable range of sites within the NUA should therefore be a priority for the GNLP if it is to suitably strengthen the city.

Question 15 - How can infrastructure delivery be well co-ordinated and funded to support growth?

- 2.27. Infrastructure delivery must be planned and coordinated from the earliest stages of plan preparation. A proactive – rather than reactive – approach which conversely would rely on addressing fundamental infrastructure issues through the determination of planning applications, is required to ensure infrastructure challenges are addressed in a coordinated and timely manner. In the context of the GNLP and the need to focus growth at the NUA, the successful coordination and delivery of infrastructure is particularly important, especially for more complex urban or brownfield sites.
- 2.28. Fundamentally, the NPPF and Planning Practice Guidance emphasise that infrastructure requirements should be identified through evidence, with deficiencies addressed through policy. With this in mind, the GNLP should be supported by a robust Infrastructure Delivery Plan (IDP) which identifies the infrastructure required including estimations of cost, funding source(s) and delivery partner(s). Contents of the IDP should be aligned closely with delivery trajectories and phasing of housing and employment allocations set out in the Local Plan. Clear phasing and trigger mechanisms for critical infrastructure should be set out in the Local Plan to provide certainty and ensure coordinated delivery. The IDP should be treated as a live document and reviewed regularly throughout the plan period in order to be effective; this allows for a review of expectations including around costs and funding which are ever-evolving.
- 2.29. Actual delivery of the infrastructure identified within the IDP and addressed in the Local Plan will rely on a coordinated funding strategy to garner most success. This would need to bring together developer contributions (including Section 106 and Community Infrastructure Levy), public sector funding and other relevant funding streams. The Council should pursue wider funding and delivery mechanisms where the required infrastructure cannot be funded solely through a development, ensuring those developments with additional constraints and viability challenges can still deliver and, ultimately, contribute to addressing the needs of the plan area.

Question 16 - How should the GNLP 2045 support

- Clean power and net zero objectives?

- 2.30. Greater Norwich have highlighted that the GNLP 2045 will need to support the transition to a low-carbon future in the context of increased demand for energy from data centres, electric cars, air source heat pumps, air conditioning and other energy uses. There have been discussions surrounding land south of Cremorne Lane being used as a district heating network, utilising the neighbouring river for heat. The viability and financing of such a scheme should be explored, and the principle of these development types should be supported by policy contained within the emerging Local Plan given the requirements to support net zero objectives and facilitate additional growth in Greater Norwich.

Question 20 - Do you consider that our proposed approach to engagement at the statutory consultation stages correctly identifies: the purpose of each stage of engagement?

- 2.31. We note Greater Norwich's approach to engagement and welcome the opportunities it provides for participation in the plan-making process, including that the finalised Engagement Strategy will have regard to feedback received following the Scoping consultation. We would welcome ongoing engagement with the Council and are keen to proactively engage with the process to reach a positive outcome in relation to land to the south and adjoining Cremorne Lane.