

Representations

Questions and answers

The Norwich Urban Area including the fringe parishes

39: Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.

As owner of the Deal Ground Site, we support the identification of East Norwich as a strategic regeneration area (the 'East Norwich Strategic Growth Area') on the Key Diagram and in Policy 7.1.

However, the Growth Area boundary should include all land within extant planning permission 12/00875/O and within policy GNLP0360 (Deal Ground, Trowse Pumping Station and May Gurney) as the permission site and allocation are included in the housing commitment figure and have been considered in the calculation of the housing requirement in Policy 7.1.

Planning permission 12/00875/O was for a mixed development consisting of a maximum of 670 dwellings; a local centre comprising commercial uses (A1/A2/A3); a restaurant/dining quarter and public house (A3/A4); demolition of buildings on the May Gurney site (excluding the former public house); and access bridge over the River Yare; new access road; car parking; flood risk management measures; landscape measures including earthworks to form new swales and other biodiversity enhancements including the reuse of the Grade II listed brick kiln for use by bats.

Policy GNLP0360 is an allocation for mixed use including 680 dwellings within the overall East Norwich regeneration area target of 2,000 new homes. It is understood that the boundary of the allocation includes the Deal Ground Site, Trowse Pumping Station and the May Gurney Site because that is the description in the location of the allocation, however, the accompanying map is currently unclear, and this should be made legible.

We support regeneration to be guided by an area wide masterplan, but this should not be restricted to the production of supplementary planning guidance. Instead, to make the plan sufficiently flexible to adapt to change we propose that the plan seeks a coordinated masterplanning process in collaboration with the Councils.

We believe that allocation GNLP0360 has the potential to deliver significantly more than 680 new homes and consequently we believe that until a coordinated masterplan has been completed that policy 7.1 should refer to a minimum housing supply figure and make reference to the Growth Area's potential to deliver significantly more than 2,000 new homes.

Planning permission 12/00875/O included serviced land for 27 units of affordable housing on the May Gurney site (shared nomination rights) and this level of obligation reflected the challenge of bringing forward the site for development. At the time of the issue of the permission (12 July 2013) the Council agreed that there was clear evidence that requiring affordable housing above that approved would render the development unviable with the outcome of the site remaining undeveloped for potentially a considerable period of time. The considerable benefits of developing the site outweighed the lack of affordable housing.

Allocation GNLP0360 refers to 33% of the minimum number of homes across the Growth Area to be affordable. However, this requirement does not take into account viability. Policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Different requirements may be set for different types or location of site or types of development.

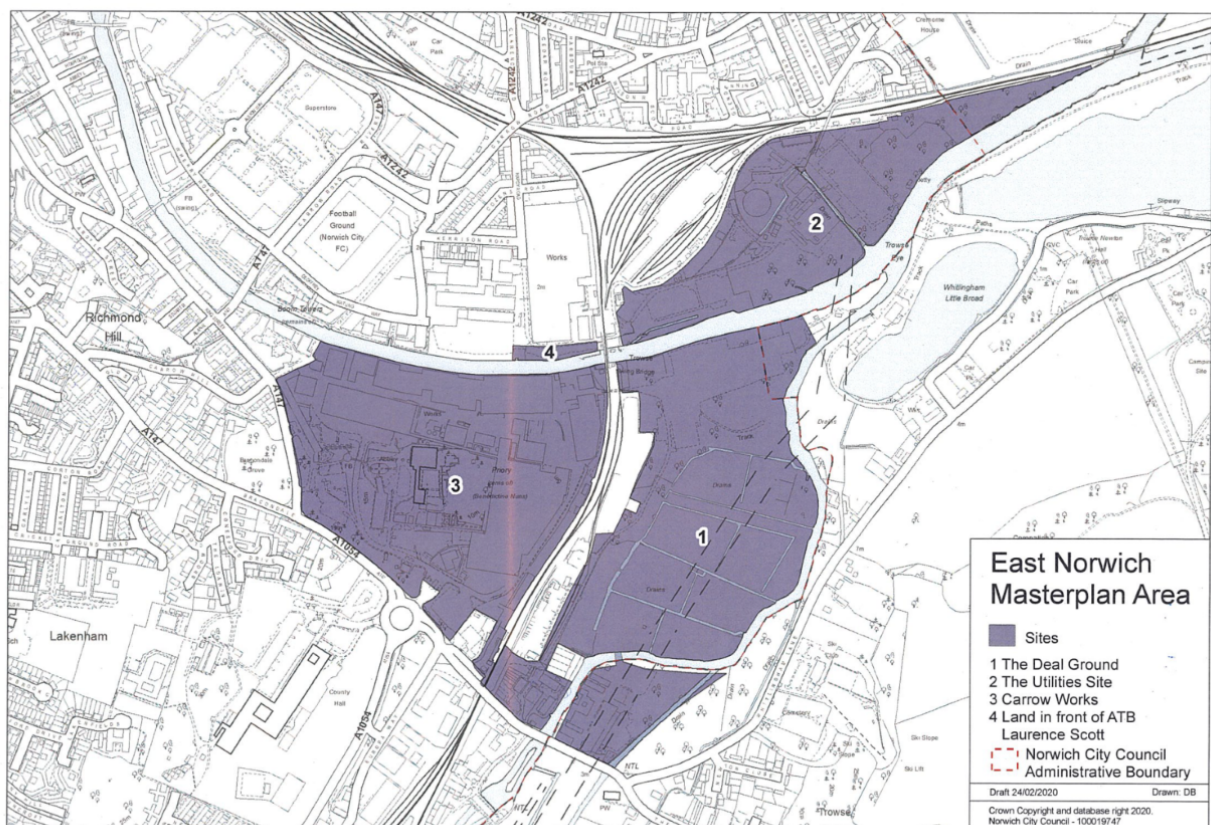
Given the known marginal viability of development on allocation GNLP0360 through the determination of planning permission 12/00875/O it is not possible to set a level of affordable housing provision required in the Growth Area without taking into account the cost implications of draft Policy 7.1 and site specific infrastructure needs. Policy requirements, particularly for affordable housing, should be set a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and

development to be deliverable. Consequently, the draft plan should allow for flexibility on the level of affordable housing to be provided in the Growth Area so that it is informed by viability testing of the coordinated masterplan. We anticipate that the masterplan will be accompanied by an infrastructure funding statement, which will set out which infrastructure will be funded by development and detail the different sources of funding, including pooling of section 106 planning obligations and CIL across all sites in the masterplan area.

Changes sought

We propose the following changes to this draft of the local plan:

Map 9: The East Norwich Strategic Growth Area boundary on Map 9 of the plan should include all land within allocation GNLP0360 (see below):



Paragraph 296: 'to ensure growth is coordinated, overcomes local constraints and is well designed in a sensitive location in and adjacent to the Broads Authority area, the policy requires regeneration to be guided by an area wide masterplan ~~supplementary planning document~~ **coordinated in collaboration with the Councils.**'

Policy 7.1: 'The area will provide a **minimum** of 30,500 additional homes and sites for a significant increase in jobs, including around 257 hectares of undeveloped land allocated for employment use'

'Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground, Trowse Pumping Station, the former May Gurney site and the Utilities Site will contribute to the comprehensive long term development of an innovative, high density, sustainable mixed use quarter. This will provide a minimum of 2,000 additional homes in the plan period **and through coordinated masterplanning significant increases on this minimum level of housing will be sought.**'

Policy GNLP0360: 'The site is expected to accommodate a minimum of 680 homes ~~subject to confirmation~~ **although significant increases on this minimum level of housing will be sought** through detailed master

planning of the wider East Norwich Strategic Regeneration Area as defined in policy 7.1 of this plan (which in total is expected to deliver a minimum of 2,000 homes, of which at least 33% should be affordable).

Affordable housing policy requirements will be set a level in the coordinated masterplan that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable. In the absence of a coordinated masterplan, viability assessment will made at the decision making stage on individual planning applications. The masterplan will be accompanied by an infrastructure funding statement that will set out what infrastructure will be funded by development and detail the different sources of funding, including pooling of section 106 obligations and CIL across all sites in the masterplan area.