

Our Ref: 20104/SH/ik  
Your Ref: n/a  
Email:  
Date: 16 March 2020

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

Submitted by email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Dear Sir/Madam

**THE GREATER NORWICH LOCAL PLAN (GNLP) STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS CONSULTATION REPRESENTATIONS 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), to make the following representations to the Greater Norwich Local Plan (Stage C Regulation 18 Draft Strategy and Site Allocations). NG and RWE are the landowners and joint promoters of the Utilities Site at Cremorne Lane, Norwich. Together, both parties have been involved in ongoing positive discussions with Urban Catalyst with regard to the future development of the site.

The Utilities Site has been identified as a site of strategic importance in the delivery of a major mixed-use regeneration scheme to the east of Norwich for in excess of 25 years. It was first allocated in the City of Norwich Local Plan 1995 and is now being carried forward from the current adopted Norwich Local Plan (2014). Part of the site is also situated within the administrative area of the Broads Authority.

The Utilities Site is not only critical to the delivery of the May Gurney and Deal Ground site but also represents an opportunity to deliver much needed development and associated benefits in its own right. NG and RWE are therefore pleased that the Utilities Site continues to be carried forward as a site allocation in the Greater Norwich Local Plan (GNLP) in recognition of its role as a key catalyst to regeneration in the East Norwich Regeneration Area. These representations are therefore submitted in support of the continuing allocation and in the interest of ensuring that development density can be maximised, in accordance with national planning policy objectives.

### **Relevant Planning Policies**

#### **Adopted Norwich Local Plan (2014)**

The Utilities Site is allocated in the current Adopted Norwich Local Plan as Policy R10. The site is identified as a key gateway site to be delivered comprehensively as part of a wider regeneration scheme in tandem with the Deal Ground and May Gurney sites. Policy R10 requires development of the site to provide a mix of uses

including residential, employment and renewable energy generation. The residential element is expected to deliver a minimum of 100 dwellings within the Norwich portion of the site.

## Local Plan for the Broads (2019)

The Utilities Site is allocated in the Broads Authority Local Plan (2019) as Policy NOR1. The site is recognised for its potential contribution to the strategic needs of the wider Norwich area. The site is allocated for mixed-use development which could include around 120 dwellings in the Broads Authority portion of the site.

## Comments

Policy 7.1 of the Draft Greater Norwich Local Plan – Part 1 ‘The Strategy’ document discusses development in Norwich City Centre including East Norwich as a sub-area. It states that brownfield regeneration sites, including the Utilities Site, have the long-term potential to contribute to the development of an innovative, high density, sustainable, mixed-use gateway quarter to include a minimum of 2,000 additional homes. East Norwich is therefore designated as a Strategic Growth Area.

Regeneration in the Strategic Growth Area is to be guided by an area-wide masterplan supplementary planning document, which will make the following provisions:

***“The masterplan will promote development of a high density sustainable mixed-use community, co-ordinate delivery of new transport infrastructure and services, enhance green links, provide for a local energy network, enhance heritage assets and address local issues including the active railway, the protected minerals railhead and flood risk issues.”***

The landowner’s comments relate to this broad intention of the proposed masterplan, which is to promote ‘high density development’ and the current allocations in both the current adopted Norwich Local Plan and the Local Plan for the Broads which set prescriptive targets for residential unit numbers on the Utilities Site.

The adopted Norwich Local Plan prescribes a minimum of 100 dwellings, whilst The Broads identifies capacity of approximately 120 dwellings. These figures combined would result in the residential element of the scheme delivering a density of approximately 35 dwellings per hectare (dph) across the site, with a density of only 14.5 dph on the Norwich portion of the site. Assuming 35 dph across the complete site this equates to 385 dwellings, which based on all other information set out herein, seems a sensible and deliverable target.

Indeed, this is not simply an aspirational target from the landowners. The site has been progressed (by a third party) through a full planning application (ref: 15/00997/F), this sought permission for 435 student units, plus outline permission for a further 120 residential units and 282 student units, together with other significant mixed development. This highlights the sites significant development capacity.

Linked to this is the affordable housing provision, which currently is tabled at 28%. There are many costs associated with delivering development at the site, having regard to the historic uses and the site constraints which, rightly, the council has already identified. On this basis, this is something that would need to be considered further, with specific regard to the viability of any proposal that should materialise.

Also of relevance is the change in circumstances around the need for, and indeed deliverability of, the new energy plant referenced in the adopted and draft allocation. RWE has considered this in detail, however, the National Grid connection costs have been demonstrated to be prohibitively expensive in development viability terms in this location. So, whilst this reference to the site’s historic ‘utility’ use is noted, and is not specifically resisted by the landowners, officers should be aware that this is no longer deemed possible.

Instead, direct connections could be made to the grid as required and further discussion should take place in this regard. The upshot of this is the ability to deliver a greater number of residential units or alternative floorspace with fewer viability and space constraints.

The aforementioned large-scale development proposal relied, to some extent, on a new access being provided from the south through the Deal Ground site, which we understand had been secured in some form through permission ref: 12/00875/O. This new access of course serves to benefit the entire Regeneration Area and Deal Ground too, providing enhanced links to the City Centre under/over the railway, and linking through to The Broads. As such, our clients continue to support the reference in the draft allocation to providing an enhanced, integrated access and transportation strategy. Likewise, there is support for the continued promotion of use of the River Wensum for moorings (only) to the southern side of the utilities site, and indeed the enhanced use of the river for freight, passenger and recreational use.

Notably, Deal Ground's outline permission also allowed for 670 new residential units spread across the portion of land to the south of the River Wensum, including the May Gurney allocation. These combined numbers still leave a significant shortfall to the targeted 2000 minimum units for this strategic area, signifying the need to see increased deliverability elsewhere, where land is suitable and available, in the regeneration area.

Returning to the Utilities Site, the site is cleared, available, suitable and deliverable for development now, and certainly within years 0-5 of the plan, subject to the determination and implementation of suitable access arrangement. This does rely on joint-up discussions and progression, but the landowners, and indeed potential purchasers, are keen to explore the opportunities for the site to progress alongside the plan making process to ensure that the site does not stagnate whilst others refine their approach.

## **Conclusions**

The landowners are supportive of the continued allocation of the site for a mix of uses to be delivered as comprehensive regeneration scheme along with the Deal Ground and May Gurney sites.

The landowners acknowledge that there are access and infrastructure matters still to be resolved throughout the East Norwich Regeneration Area, however, the draft allocation should be updated to allow sufficient flexibility for the delivery of a suited mix of uses and higher density of residential development across the Utilities Site in order to respond to changing requirements, viability constraints and suitability/availability of the site.

I trust that the above provides clarity on the landowner's continuing support for the site allocation, as well as the areas that require further agreement, however if any further information or clarification is required, please contact me. Otherwise, we look forward to discussing in more detail when the time comes.

Yours sincerely,



SAM HARPER  
Director

Enc.

cc. Ben Quarrie - National Grid

Matthew Trigg - RWE Generation UK plc