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Dear Sir/Madam

Barrack Street/Whitefriars - Greater Norwich Local Plan: call for sites

I write in relation to the current consultation on the call for sites in preparation for the Greater Norwich Local Plan. I note from the guidance notes that it states, "the starting point for the review assumes that all sites identified for development in a current plan remain appropriate and will not need to be replaced in the new Local Plan. Sites identified for a specific land use in current plans do not need to be promoted again through this process, unless a change of use is sought."

Enclosed drawing 5183 identifies the area of land which is currently covered by policies CC17a (part only) and CC17b of the Norwich Local Plan Site Allocations and Site Specific Policies Plan, December 2014. The area represents the undeveloped area of land within Jarrold & Sons and Jarrold (St James) Ltd control. The area has not come forward for development and Jarrold has concerns that the current allocations are not viable.

The area identified on the attached plan is constrained by five heritage assets in the form of views to Norwich Cathedral, proximity to the City Wall (schedule ancient monument), St James Mill (grade I listed), St James' Church/Puppet Theatre (grade I listed) and 77-79 Barrack Street (grade II listed). In addition to these visible constraints there are also constraints beneath the ground; the greatest uncertainty of these in terms of impact on viability is archaeology.

To the east of the area identified on enclosed drawing 5183 is the site of "zone F", an office development of 8,079sqm (86,972sqft). Jarrold is actively seeking tenants for zone F but currently there is insufficient commitment from prospective tenants. This combined with the policy wording of CC17b – "Land at Whitefriars is allocated for office led mixed use development" adds policy and market constraints to an already significantly constrained site. It is in Jarrold's and Norwich City Council's interest to facilitate the redevelopment of this prominent brownfield site. To date there has been no evidence from Norwich City Council why this site should be a particular use or mix of uses.

Jarrold's vision for land within its ownership at Barrack Street/Whitefriars is to ensure the transition from the former use of the site for printing and publishing to the creation of a mixed property portfolio of high quality design to provide a sustained investment for the Jarrold Group over the long term.

Completion of the buildings between St James Mill and Whitefriars (1 St James Court and Carmelite House) fulfilled Jarrold's first office led investment objective. The next phase of Jarrold's redevelopment strategy required a package of elements to create a unique selling point in order to attract office occupiers to this area of the city. Out of town locations such as Broadland Business Park have intensified competitiveness in the office market. The concept of offices on the river frontage, views to Norwich Cathedral, links via a new bridge (the purpose built and forward funded Jarrold Bridge) all contribute to the unique selling point. Kingfisher House, Dragonfly House and, once completed, zone F contribute to the office element with zones A and E providing a residential element to Jarrold's mixed property portfolio.

Jarrold contend that the objective for the undeveloped area of the site identified on enclosed drawing 5183 should be to deliver a development of high quality design; whether the use is 100% office, 100% residential or a mix of uses is secondary to the objective of redeveloping the site. Jarrold is concerned that a policy specifying

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the use or mix of uses for the area identified on enclosed drawing 5183 is actually contributing to delay in the site coming forward.

Due to uncertainty in the viability and deliverability of this site as allocated, Jarrold is seeking the deallocation of policy CC17b and the area of policy CC17a which does not benefit from extant planning permissions. Jarrold support the inclusion of the area within the City Centre as this removes the need to i) apply the sequential test for main town centre uses (retail, leisure and office uses); and ii) require an impact assessment. Residential development is not precluded in the City Centre by virtue of the presumption in favour of sustainable development.

Jarrold is happy to discuss its rationale for submitting this letter at the forthcoming meeting with Graham Nelson and Mark Brown at Norwich City Council.

Yours sincerely

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Enc(s):