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Mr Mike Burrell
Greater Norwich Projects Team
c/o Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2D

9.12.2019

Ref:1194

Dear Mike,

Confirmation of Deliverability of St Mary's Works, Duke Street, Norwich

Background

The Greater Norwich Development Partnership (GNDP) consulted on the Greater Norwich Local Plan (GNLP) Regulation 18 Consultation Draft in January to March 2018 and on new revised and small sites in October to December 2018 and have since that time been deciding on the best locations for future growth across the Greater Norwich Area. The Partnership has also been assessing the appropriateness of numerous proposed allocation sites (which they received during both the Regulation 18 and earlier Call for Sites consultation stages).

The GNDP was due to consult on their final draft Spatial Strategy and their preferred site allocations between October and December 2019, however, for reasons unknown, the consultation has been postponed until early 2020.

With the Local Plan remaining at the Regulation 18 stage, there is, for the moment, a potential opportunity to provide the GNDP with suitable, available and deliverable development opportunities for their consideration and potential allocation and / or to confirm the deliverability or suitability of sites that are already being considered by the Partnership and / or its constituent authorities for allocation.

The former St Mary's Works site, located to the west of Duke Street in Norwich City Centre (see **Appendix 1** for location plan), is being considered by Norwich City Council for allocation in the GNLP. The site has an extensive planning history and has been accepted by Norwich City Planning Officers and Members through the grant of a recent planning permission and through its historic allocation within the now expired Northern City Centre Area Action Plan, as appropriate for mixed use re-development.

Given the site's location within the City Centre of Norwich and the presence of an extant outline planning permission allowing for the site's comprehensive mixed use redevelopment, the landowners, Our Place, have not to date considered it necessary to actively promote the site for allocation through the Local Plan process.

Notwithstanding, it is understood from conversations with Norwich City Council Development Management Officers, that the Council is considering an allocation for the site and, if and when agreed, will issue it in draft for comment as part of the next consultation on the draft GNLP. Our

Place is supportive of NCC's proposal to allocate the site for a mix of uses in reflection of its evidential development potential.

The site has been demonstrated through previous planning permissions and applications to be a suitable site for mixed use redevelopment and its sustainability and appropriateness for allocation is confirmed against the GNDP's own sustainability criteria at **Appendix 2** to these representations.

In acknowledgement of NCC's proposal and to ensure that any draft allocation is deliverable, Our Place summarise within the remainder of this letter, the site's development potential and provide their recommendations for any potential, future allocation.

Summary of Development Potential

Context

The site was previously allocated within the Norwich Northern City Centre Area Action Plan for comprehensive mixed-use redevelopment. It is important to say that the AAP has reached the end of its 10 year timeframe and is no longer part of the adopted Local Plan. During the course of its 10 year lifespan it is understood that there were no comprehensive redevelopment proposals brought forward at the site in accordance with the AAP allocation.

The Policy (SMW1) allocated the site for "mixed use redevelopment" including offices and residential accommodation, with the possible addition of a hotel.

The policy encouraged the conversion of the locally listed St Mary's Works Factory located on the south western corner of the site (subject to its structural feasibility and the viability of the scheme as a whole) with greatest emphasis given to seeking to retain those structurally stable parts of the building's frontage onto Oak Street / St Mary's Plain.

The policy prescribed a minimum of 40 dwellings with at least 15% designed as family units.

The policy required a new public square and the improvement of the existing churchyards located to the north and south of the site.

Pedestrian green links were prescribed and it was specified that buildings fronting onto St Martin's Lane and the two historic churches should be lower than those facing Duke Street and St Crispin's Road.

Since the expiry of the AAP, two comprehensive development proposals have been put forward by the current landowner. Whilst the schemes have generally complied with the intentions of the expired policy, the applicant has needed to extend the mix of proposed uses beyond those specified in the AAP and has had to respond positively and flexibly to local market signals and public and political pressures in order to find a scheme that was deliverable at the time of submission.

The site is located within the City Centre Conservation Area and its redevelopment is affected by a significant number of locally and statutorily listed buildings on and / or around the site. The presence of these buildings constrain the scale and massing of future development across certain areas of the site which in turn effects the amount of development able to be delivered. In addition, the need for the any redevelopment proposal to provide a positive response to potential below ground

archaeology, flood risk and drainage and ground conditions results in a series of abnormal development costs.

In order to allow future development to respond positively to these constraints, there is a need for any site specific planning policies or allocations to be sufficiently flexible so as not to prove overly onerous and prevent redevelopment from taking place.

The National Planning Policy Framework ('the Framework'), sets out clear guidance on the preparation of Local Plans and is clear at paragraph 16 that plans should: *"be prepared positively, in a way that is aspirational but deliverable."*

In accordance with paragraph 35 of the Framework, there is a need for all aspects (policies and allocations) of Local Plans to be: positively prepared, justified, effective; and consistent with national policy i.e. it enables the delivery of sustainable development.

Recommendations

In order to meet these national policy tests, it is important that any proposed allocation for the St Mary's Works site:

1. Acknowledges and provides positive and flexible options for dealing with known environmental and economic constraints.
2. Advocates a deliverable development scenario that is not so prescriptive so as to constrain future development.
3. Is justified, based upon up to date local needs assessments whilst being capable of responding positively to changes in market conditions across the lifetime of the Local Plan.
4. Promotes the delivery of sustainable development through giving appropriate regard to the need for environmental, social and economic improvements at the site.

To this end, it is respectfully recommended that any site-specific allocation as and when drafted for the site:

- a. Does not fix the scale or amount of uses that may be considered appropriate by the Council at the time of drafting.
- b. Allows for site specific constraints to be managed through the provision of assessments / evidence at the planning application stage.
- c. Allows the extent, massing and design of the development to respond to the site's everchanging spatial context and the viability of any scheme.
- d. Recognises the significant scale of any redevelopment proposals and the potential need to deliver redevelopment over a series of phases.
- e. Sets out a series of objectives that development should meet and a range of potential uses that are suitable for a Town Centre brownfield site such as this.
- f. Those uses that are considered appropriate for the site include:
 - a. Residential (and with the policy acknowledging the opportunity to set the level of affordable housing provision appropriate to the site at the application stage).
 - b. Employment uses, including a range of traditional B1 uses and other potentially less traditional employment generators, including small scale retail uses.
 - c. Community and leisure uses.



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- d. Hotel / visitor accommodation.
- e. Educational / training and accommodation facilities for the City's growing student population.
- f. New open spaces and improved public realm.

Conclusion

The site owner is supportive of NCC's proposal to allocate the site for a mix of uses. However, in light of recent applications and potential fluctuations in market conditions, they respectively request that any draft allocation is worded flexibly to ensure that it promotes and does not constrain the scale, form, mix and timing of the site's future development.

The owner will continue to monitor the Local Plan process and respond to any draft allocation as and when published.

I trust that the above and enclosed is of some assistance to you and your colleagues in concluding the suitability and deliverability of the proposed allocation site, however, if you require any further information, please do let me know.

Yours sincerely

Hannah Smith

Associate Director

Enc. As above

cc:

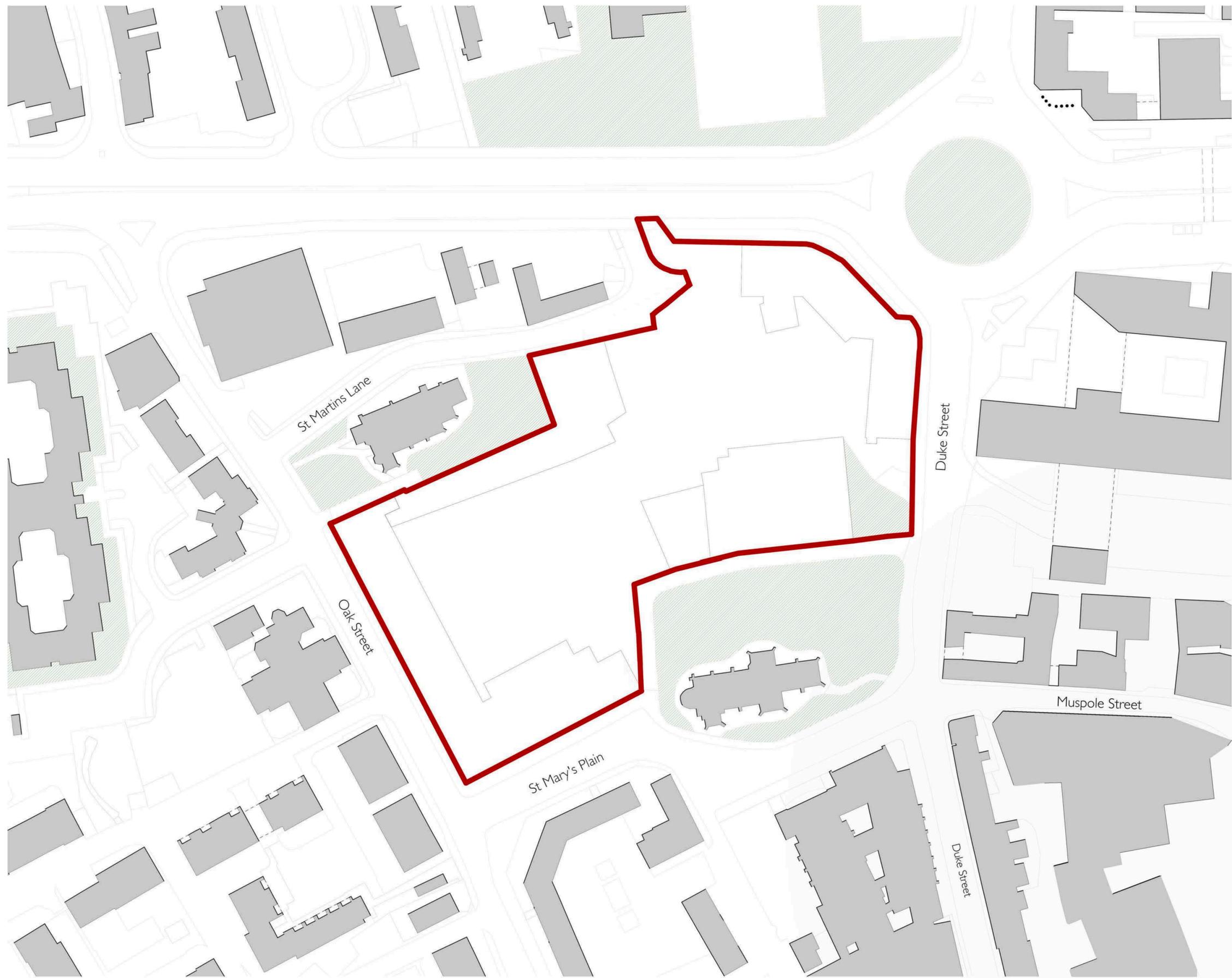
Lara Emerson, Senior Planner, Norwich City Council

Charlotte Hounsell, Planning Policy Officer, Norwich City Council



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Appendix 1 – Site Location Plan



TITLE				
Existing Site Plan SMW				
STATUS				
For Planning				
DATE	SCALE	PROJECT NO.	DRAWING NO.	REVISION
03.02.16	1 : 500	SMW	0002	
	@ A1			

Appendix 2 – Confirmation of Site’s Sustainability

Constraints Analysis	Lanpro Assessment (on behalf of Our Place) (Red / Green / Amber)	Reasoning
Access	Green	Access into the site can be taken via the existing point of access from Duke Street. Previous permissions and applications at the site have demonstrated that there is a safe and potentially beneficial solution to pedestrian and vehicle access and egress.
Accessibility to Services	Green	The site is sustainably and beneficially located within the City Centre of Norwich within easy walking distance of an extensive number of shops, services and residential communities. The site’s location is capable of sustainably supporting a wide variety of uses.
Utilities Capacity	Green	<p>Anglian Water confirmed as part of the 2019 full planning application at the site that the Whitlingham Trowse Water Recycling Centre has capacity to treat development flows and that it is acceptable to allow for gravity flows from the site to the foul sewage network.</p> <p>It was also confirmed that the high voltage network located within St Mary’s Alley and Duke Street has sufficient capacity to serve the site without the need for off-site reinforcement works. Furthermore, the National Grid low pressure 100mm gas main adjacent to the site, has capacity.</p>
Utilities Infrastructure	Green	The site is well served by public surface and foul water sewers

Constraints Analysis	Lanpro Assessment (on behalf of Our Place) (Red / Green / Amber)	Reasoning
		located along St Martin's Lane and St Mary's Plain.
Contamination and Ground Stability	Green	<p>A number of assessments of the site's ground conditions have been undertaken and submitted in support of recent planning proposals.</p> <p>These confirm that the risks posed by ground contamination and or land stability are not of such significance to, with the application of appropriate remediation and mitigation, pose an unacceptable risk to users of the site.</p>
Flood Risk	Green	<p>The Environment Agency's Map for Planning indicates that the site is currently located partially within Flood Zone 2 and therefore has between a 1 in 100-year (<1% AEP) and 1 in 1000-year (>0.1% AEP) chance in river flooding in any given year, or between a 1 in 200-year (< 0.5% AEP) and 1 in 1000-year chance of tidal flooding in any given year.</p> <p>The Environment Agency's Risk from Surface Water Flooding map indicates that the site is at 'very low' to 'low' risk of surface water flooding.</p> <p>The planning applications and permissions relating to the site have however, demonstrated that the risk of flooding can be effectively managed on the site through the setting of appropriate finished floor levels, surface water management</p>

Constraints Analysis	Lanpro Assessment (on behalf of Our Place) (Red / Green / Amber)	Reasoning
		and through the application of flood warnings and escape measures.
Market Attractiveness	Green	<p>The site is owned by Our Place who are actively promoting it for redevelopment through the planning process.</p> <p>Extensive interest has been expressed in the site by a variety of operators for a mix of commercial, residential (including student accommodation) and leisure users.</p>
Impacts Analysis		
Significant Landscapes	Green	The area does not lie within any Nationally significant landscapes.
Townscapes	Green	<p>The site is located within the City Centre Conservation Area.</p> <p>The north eastern portion of the site bounds St Crispin's Roundabout which is recognised as a main gateway into the City where new landmark buildings of exceptional quality will be accepted.</p> <p>Townscape assessments prepared in support of recent proposals at the site have demonstrated how development can be effectively accommodated without significant impact and can, in many instances, deliver betterment to the character and visual appearance of the site and its surroundings.</p>
Biodiversity and Geo-diversity	Green	There are no ecological designations affecting the site. The site has been found through recent assessments to have the potential to support common breeding birds and bats

Constraints Analysis	Lanpro Assessment (on behalf of Our Place) (Red / Green / Amber)	Reasoning
		<p>(within existing buildings). Any impacts upon species can, however, be effectively mitigated at the planning application stage.</p> <p>Recent proposals have demonstrated how the ecological value of the site overall, can be improved through its redevelopment.</p>
Historic Environment	Green	<p>The site is located within the City Centre Conservation Area and close to a number of statutorily Listed Buildings.</p> <p>The previous planning approval demonstrates, however, that development can be brought forward onsite without creating unacceptable impacts upon these heritage assets.</p> <p>The former shoe factory located on the site is considered of some local heritage value but is not statutorily listed and does not present an unsurmountable constraint to the site's comprehensive redevelopment.</p>
Open space and GI	Green	<p>The site is capable of providing meaningful new areas of public realm and previous schemes have demonstrated how the redevelopment of the site may assist in the physical and environmental upgrade of the two churchyards of St Martin's and St Mary's to the north and south of the site to considerable local benefit.</p>

Constraints Analysis	Lanpro Assessment (on behalf of Our Place) (Red / Green / Amber)	Reasoning
Transport and Roads	Green	<p>The site is well served by the local and strategic road networks including the A147 to the immediate north of the site.</p> <p>The site is well served by public transport links, being within easy walking distance of a number of bus services and Norwich’s central bus and rail stations.</p>
Compatibility with Neighbouring uses.	Green	<p>The site is located within Norwich City Centre where shops, services and employment uses adjoin and complement one another.</p> <p>Previous schemes for the site have demonstrated how a mix of uses can be appropriately accommodated whilst respecting adjacent residential, commercial and heritage uses and ‘assets’. The site’s north eastern boundary fronts onto St Crispin’s roundabout which can support a variety of uses which would benefit from prominent locations and additional massing and building height.</p>