

Greater Norwich Local Plan: Regulation 18 Consultation General Response Form

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email gnlp@norfolk.gov.uk

It is easier to respond online at www.gnlp.org.uk . If you cannot do this, please use this form to respond to the:

- Growth Options document – there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from www.gnlp.org.uk

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2nd floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

Submitting your Response Form

Responses should be made electronically on the webform which is available at www.gnlp.org.uk . Alternatively this response form can be downloaded and submitted by email to gnlp@norfolk.gov.uk

Completed hard copy forms can also be sent to:

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

All submissions should be made on or before **5pm on Thursday 22 March 2018**.

Please note that anonymous submissions cannot be accepted.

Contact Details	
Organisation (where relevant)	'Hill Residential Ltd' and 'Jarrod & Sons'
Address	C/O Agent

Agent Contact Details	
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Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.

Document (please tick as appropriate)		
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Evidence Base	Caravans and Houseboats	<input type="checkbox"/>
	Employment, Town Centres and Retail Study	<input checked="" type="checkbox"/>
	Habitats Regulation Assessment (HRA)	<input type="checkbox"/>
	New Settlements Topic Paper	<input type="checkbox"/>

Evidence Base	Strategic Flood Risk Assessment (SFRA) ¹	<input checked="" type="checkbox"/>
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.

Introduction/ Background

Jarrold & Sons owns land south of Barrack Street and north of the River Wensum stretching from Whitefriars on its western boundary to and including the health and fitness club (currently occupied by Nuffield Health) at its eastern boundary. A separate representation response has been submitted in respect of the wider site.

The undeveloped land within Jarrold & Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.

Hill Residential Ltd is the appointed delivery partner for 'Land at Whitefriars and South of Barrack Street' as identified on site location plan reference: 8436-FM-DR-2000. This site is the focus of this representation submission.

Site Proposals Consultation Document and HELAA

'Land at Whitefriars and South of Barrack Street' (as identified on site location plan reference: 8436-FM-DR-2000) was submitted to the Council in 2016 in response to the Call for Sites.

The Greater Norwich Local Plan Regulation 18 Consultation Map identifies this site with the following references:

- HELAA Reference: GNLP0409 – Barrack Street/ Whitefriars
- Greater Norwich Strategic Employment Site References: N A4, N A5, NE 22

The submission made by Code Development Planners Ltd on behalf of Jarrold & Sons requested the deallocation of the site. The Council's HELAA assessment for GNLP0409 states at page 864 that:

¹ Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#)

"This site has not been assessed for the purposes of the HELAA as there is no development proposal submitted to the GNLP. However this site is considered suitable for development as it has planning permission and is already allocated in the current Norwich Local Plan."

In recent years Jarrold & Sons has delivered the following office elements: 1-3 St James' Court; Kingfisher House and Dragonfly House, Gilders Way. The next element of office development to be completed is at land known as 'Zone F'.

Hill Residential Ltd has been appointed as delivery partner with Jarrold & Sons to pursue an alternative proposal 'Land at Whitefriars and South of Barrack Street'.

Hill Residential Ltd is actively engaging with Norwich City Council in pre-application advice to seek to deliver approximately 200 residential dwellings with an element of retail use (A1-A5 use, approximately 350sqm). It is requested that the site is reassessed within the HELAA in accordance with this current proposal.

Principle of Residential Use at this Site

Response to GNLP Options Document Questions:

- **19: What should the plan do to promote housing development in the city centre? And**
- **29: Are there employment areas that should be identified as suitable for release for residential uses?**

GVA produced the 'Greater Norwich: Employment Land Assessment' (December 2017).

Paragraph 2.51 states that:

"The Norwich City Centre Cluster includes three existing employment sites and two mixed use sites totalling 16 ha. These sites accommodate a mix of uses and reflect their city centre character with a varying building age and quality. Given the strategic city centre location and good road access, each of the sites are particularly suited to continued B class use."

It explains that Site N E22 is considered alongside N E23 (Blackfriars), N A4 and N A5 as single sites given their shared characteristics, blurred borders, and continuity across sites. This relates to land at Barrack Street and Whitefriars as illustrated above.

Paragraph 2.53 states that:

"Site NE22 lies adjacent to Site N E23, both lying either side of Whitefriars. Site N E22 includes a mix of large office buildings with a large amount of allocated space in the centre that was previously used for car parking. The site is well connected to the strategic highway with direct access to the A147. Site N E23 shares similar characteristics but has no vacant land and appears to be occupied by a large single industrial building. Given the value of both sites and their connectivity, both are recommended for protection and maintenance, and continued development of a similar nature is recommended for Site N E22."

Table 12: Norwich City Centre Existing Site Profiles

GVA Site Ref	Council Site Ref	Site	Site Area (ha)	Stock Quality	Site Quality	Future Advice
N E22	NC021	Gilders Way	8.58	Mixed	Mixed	Protect & Enhance Large site with a mix of high value occupiers and large development opportunity.
N E23	NC023	Blackfriars Street	1.42			Protect & Maintain Mature site with large occupier.

It is considered that the 'Greater Norwich: Employment Land Assessment' (December 2017) has oversimplified the assessment of employment at site NE22. It is important to recognise that Jarrold & Sons has secured permission for and delivered the following employment development:

- 1-3 St James Court, Whitefriars;
- Kingfisher House, Gilders Way; and
- Dragonfly House, Gilders Way.

In addition Jarrold & Sons has implemented consent for Office space for two new blocks at Land South of Gilders Way (known as F1 and F2) (LPA Ref: 06/00724/F / 08/00538/RM). Jarrold & Sons remains committed to the delivery of this employment space.

It is requested that the 'Greater Norwich: Employment Land Assessment' is refined to take account of the above.

The GVA 'Employment, Town Centre and Retail Study: Strategy Advice' notes that:

"2.21 The Employment Land Assessment has identified that the majority of existing stock is fit for purpose and will continue to meet the needs of current businesses and also some level of future growth, however it is clear that to accommodate the scale and diversity of projected need further sites will be required that offer the particular conditions for key sector growth. As explored within the Employment Land Assessment (table 46, page 110) this potentially sets a clear need to focus on bringing forward a number of key sites that offer the most appropriate proposition for the core growth sectors.

2.22 It is critical for Greater Norwich to have this focus on employment land assets that are most likely to be attractive to future occupiers given that the Employment Land Assessment indicates that if all allocations and potential sites are considered the Greater Norwich area could offer a significant oversupply of development land earmarked for employment activity.

2.23 Focusing future efforts and attention on those sites that offer the conditions that best align with the requirements of likely occupiers within the key growth sectors will provide a clear message (or set of messages) to developers and occupiers. It will also allow the development proposition to be refined to best meet what the likely form of demand will be.

2.24 Clearly, there are likely to be significant fluctuations and changes within the Greater Norwich economy over the 20 year plan period that may change the

specific nature and sectoral mix of the area. However, despite activities changing the fundamental requirements of business locations are likely to remain broadly consistent over the long term, even where there may be short term variations.

2.25 In the main locations with strong infrastructure and accessibility fundamentals that provide a strong amenity offer have continued to be attractive to the majority of business occupiers, regardless of broader economic shifts. As the economy becomes more focussed on talent and the ability to move goods or information efficiently these attributes will be in even greater demand.

2.26 As such it is clear that a number of locations across Greater Norwich present a strong investment proposition, but also one that has presents opportunities for particular types or scales of development. Based on our analysis of both the portfolio of sites and future sector growth a broad pattern emerges between locational opportunities and activity types which lead to particular development typologies potentially being required:

- Large business / science parks – corporate/back office, R&D*
- Trunk road sites – logistics/distribution, large scale production/engineering*
- Standalone/isolated locations - specialist research and product development, specialist manufacturing*
- City centre – corporate/shared office spaces, co-working, mixed use and live work*
- Town centres – smaller, professional services"*

Page 34 of the GNLP Growth Options Report highlights that there is a "...need to balance the amount of land required for housing and employment uses is a particular consideration in the city." Of particular concern is the reference within the employment evidence base to the potential for "an oversupply of development land earmarked for employment activity" (paragraph 2.22).

It is reiterated at page 41 of the GNLP Growth Options Report highlights that "there is a need to balance providing new homes in highly sustainable brownfield city centre locations with ensuring sufficient land is available for other city centre functions" (paragraph 4.101).

Hill Residential Ltd is working in partnership with Jarrold & Sons to seek to deliver an alternative to employment development at land at Whitefriars and south of Barrack Street. The proposal is for residential development with ancillary retail floor space at Land south of Barrack Street and west of Gilders Way. In light of the above comments, it is requested the site is reassessed within the HELAA.

Site Location: Land at Whitefriars and south of Barrack Street, Norwich

Proposal: Approximately 200 residential dwellings with an element of retail use (A1-A5 use, approximately 350sqm).

Site Constraints Analysis

Access	<p>It is proposed that vehicular access will be taken from the north via Barrack Street and into the site via Gilder's Way.</p> <p>The proposals will seek to enhance pedestrian and cycle links through the site and along the River Wensum.</p> <p>There are a number of bus stops in proximity to the site including: Anglia Square, Mousehold Street, and Palace Street.</p>
Accessibility to Services	<p>The site benefits from a central location and as such has good access to existing services and facilities including: education facilities, medical centres, shops, and employment.</p>
Utilities Infrastructure and Capacity	<p>Given the central location of the site it is considered that the necessary utility services can be provided. As part of pre-application discussions, Hill Residential has engaged with Anglian Water, UK Power Networks to confirm utility provision requirements.</p>
Contamination / Ground Stability	<p>There is an existing slab at the ground floor slab which is proposed to be replaced as part of the proposal. It is considered that any contamination/ ground stability matters will be addressed through the replacement of the slab.</p>
Flood Risk and Drainage	<p>According to Environment Agency Mapping, the majority of the site is located within Flood Zone 2 with an area of land to the south east of the site located within Flood Zone 3. The Hill Residential flood risk consultant has engaged with Environment Agency as part of pre-application discussions.</p> <p>At present, there is ground cover in the form of an existing floor slab and hardstanding across the entirety of the site.</p> <p>The initial proposals seek to:</p> <ul style="list-style-type: none">• Incorporate an area of public open space at the south east of the site (subject to Flood Zone 3 classification).• Reduce the amount of hardstanding at the site and increase opportunities for sustainable urban drainage solutions (SUDs). <p>It is requested that the Council's Strategic Flood Risk Assessment should be updated to reflect the current proposals for residential use in this location.</p>

Market Attractiveness	<p>Hill Residential Ltd is an award winning regional house builder and they are actively promoting this site for residential led redevelopment.</p> <p>Whilst it is acknowledged that this is a complex site it is considered to be viable for residential development. Detailed consideration will need to be given to the anticipated level of affordable housing provision as the scheme progresses.</p>
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Site Impacts Analysis

Significant Landscapes	<p>The redevelopment of this site offers an opportunity to enhance the setting of the River Wensum. Hill Residential Ltd intends to deliver the approved landscaping and 'Riverside Walkway' proposals connecting to the east of the site.</p>
Townscapes	<p>Careful consideration will need to be given to the scale, massing and siting of new buildings to avoid detrimental impacts upon key townscape features, heritage assets and views including that of Norwich Cathedral and Mousehold Heath.</p> <p>Hill Residential Ltd has engaged with Norwich City Council in pre-application discussions about this matter.</p>
Biodiversity and Geodiversity	<p>It is proposed that there will be new landscaping at the site to enhance opportunity for biodiversity. It is intended this will connect into the existing green infrastructure network.</p>
Historic Environment	<p>The site incorporates the following heritage assets:</p> <ul style="list-style-type: none"> • Remains of the City Wall (Scheduled Ancient Monument) • Listed Buildings: 77-79 Barrack Street (Grade II), • Annex to St James Mill <p>The site is partially located within the City Centre Conservation Area.</p> <p>Careful consideration will need to be given to the aforementioned heritage assets in the design of the development proposal.</p> <p>Following agreement with Norfolk Historic Environment, the site is currently subject to an ongoing programme of 'pre-application archaeological investigation'. This work will inform the proposed siting of new buildings.</p>
Open Space and Green Infrastructure	<p>Open space will be delivered at the site. It is currently proposed to be located at the south east of the site with a linear park adjacent to the city wall.</p>

	In addition Hill Residential Ltd has agreed to deliver the 'Riverside Walk' enhancements as part of the proposal. It is therefore considered that the proposal will have a positive impact on open space and green infrastructure provision.
Transport and Roads	As highlighted above, the site has an accessible town centre location. Initial transport modelling completed by WSP has indicated that the proposal will have " <i>an imperceptible increase in the day to day traffic flows.</i> "
Compatibility with Neighbouring Uses	Residential development in this location is considered to be compatible with the existing adjacent office space land uses. The ancillary retail element of the proposal will complement the existing office uses and proposed residential uses.

Available: The site is available now. Hill Residential Ltd is the appointed delivery partner to promote this site for allocation and to deliver residential development.

Developable: The site is considered to be deliverable immediately, subject to planning.

Disclaimer

Data Protection and Freedom of Information

The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Declaration

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Lydia Voyias

Date 22 03 2018

Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 22 March 2018**.

By email: gnlp@norfolk.gov.uk

Or, if it is not possible submit the form electronically,

By post to:

*Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX*

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: www.gnlp.org.uk

E-mail: gnlp@norfolk.gov.uk

Telephone: 01603 306603