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CAPL391634/A3/LV



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Dear Sir/ Madam,

Greater Norwich Local Plan – Regulation 18 Consultation – Stage B
Site Ref: GNLP0409R - Land at Whitefriars and south of Barrack Street, Norwich

I write on behalf of 'Hill Residential Ltd' in response to the current consultation to provide additional information about 'Land at Whitefriars and south of Barrack Street, Norwich' (Site Ref: GNLP0409R).

Housing and Economic Land Availability Assessment (HELAA) Addendum

In order to identify land for homes the National Planning Policy Framework requires Local Authorities to prepare a strategic housing land availability assessment (para 67).

In March 2018, representations were submitted on behalf of 'Hill Residential Ltd and Jarrold & Sons' in response to the Greater Norwich Local Plan Regulation 18 Consultation in which we requested that the Council reassessed the site at 'Land at Whitefriars and south of Barrack Street, Norwich' within the Housing and Economic Land Availability Assessment on the basis of 'residential led-mixed use development' as opposed to 'employment led-mixed use development'.

It is acknowledged that the site has been reassessed within the Housing and Economic Land Availability Assessment (HELAA) Addendum (October 2018, pages 153 and 154). We support the HELAA Addendum findings which conclude that the site is suitable, available and achievable.

The detailed assessment notes that there are some site specific constraints but it is stated "*it is considered that these could be mitigated*". We support this conclusion.

Additional Information

The following additional information is submitted to inform the ongoing consideration of 'Land at Whitefriars and south of Barrack Street, Norwich' as a potential residential allocation within the emerging Greater Norwich Local Plan.

Current Applications

In August 2018 a full planning application and an application for listed building consent were submitted to Norwich City Council on behalf of 'Hill Residential Ltd and Jarrolds (St James) Ltd' for the '*Demolition of existing buildings and structures; erection of 218 dwellings; reinstatement of two grade II listed cottages and erection of 447 sqm of commercial floorspace (Class A1-A5 use) with associated works*' (Application References: 18/01286/F and 18/01287/L).

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Consideration of Detailed Comments

The HELAA Addendum has provided some site specific comments which are being considered in detail as part of the pending planning applications. Consideration has been given to each comment in the table below.

HELLA Addendum Comments	Application Response
The Highways Authority require further information.	The full planning application is supported by a detailed Transport Assessment and Draft Travel Plan. The site has good access to key services and employment provision.
There is potential contamination on the site as it was formerly a factory/print works	Whilst there is potential for contamination at the site redevelopment will provide an opportunity for any contamination to be removed and remediated prior to construction of the development.
The eastern third of the site is in Flood Zone 2 and at risk of surface water flooding.	The full planning application is supported by a Flood Risk Assessment and Surface Water Drainage Strategy. The Environment Agency has agreed to the surface water drainage solution. The Lead Local Flood Authority have raised comments to which the Application have responded.
There are landscape issues as the site is adjacent to Broads Authority area at the river and is further constrained by TPOs and group TPOs.	The Applicants are proposing a detailed landscaping scheme across the site, this includes planting of new trees.
The site is located within the city centre conservation area. There are listed buildings at the site. Some remains of the city wall (scheduled monument) are located at the site.	The Applications are supported by a Heritage Impact Assessment which considers the impact of the proposals upon the significance of the heritage assts.
There are no ecological constraints	The full planning application is supported by a Preliminary Ecological Appraisal and Bat Surveys.
There is no loss of publicly accessible open space.	The full planning application proposes incorporates a linear park alongside the city wall remains. This will also accommodate play space.

Deliverability

Hill Residential Ltd is an award winning regional house builder and they are actively promoting this site for residential led redevelopment.

Subject to securing planning permission, Hill Residential Ltd anticipates starting on site during 2019/20. The first dwelling completions are anticipated to take place in 2020/21, with all 200 dwellings expected to have been completed by the end of 2024/25.

Market Attractiveness

The site has been given an amber rating which is described as *“Through development the site may become attractive to the market”*. The fact that Hill Residential is actively seeking planning permission, with a viable proportion of affordable housing delivery, is reflective that the site is attractive to the residential market. As such, it is requested that the Council amend its assessment to acknowledge this.



Summary

Support is given to the conclusions of the Housing and Economic Land Availability Assessment (HELAA) Addendum (October 2018, pages 153 and 154) which concludes that the site is suitable, available and achievable for residential development of 220 homes.

We trust that this additional information will assist you in your consideration of the proposed allocation.

Yours sincerely

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Associate