

## **GNLP – REGULATION 18(C) CONSULTATION RESPONSE**

### **NORWICH – SITE REFERENCE CC16**

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Bidwells strongly support the allocation of land adjoining Norwich City Football Club for mixed use development, including a minimum of 270 homes. The site is considered to be entirely deliverable, and capable of making a significant contribution towards the need for additional leisure, community, residential, community, retail and office uses in the Greater Norwich Area during the period to 2038.

The site is allocated in the adopted Joint Core Strategy and has, through the development of Carrow Quay (Broadland Housing and NR1 (Taylor Wimpey), already made a significant contribution towards housing delivery in the Greater Norwich area. It has the potential to be developed to provide a range of uses, which as well as residentially could include a multi purposes Arena, that could be used for, amongst other things, sport, music and conferencing; helping to achieve a sustainable development.

The site occupies a highly sustainable location within Norwich City Centre due to its proximity to a range of services and amenities and sustainable modes of transport, notably Norwich Railway Station. It has the potential to help facilitate the regeneration of the East Norwich area by ensuring that any development on the site does not prejudice the ability to ensure future connectivity, most notably through pedestrian and public transport links, in the future. However, whilst future connectivity with the East Norwich area is a key objective, the development of the site is not dependent on the regeneration of the wider area, as is demonstrated by the above referenced developments; a fact that should be specifically mentioned in either the policy or supporting text in order to provide certainty. Failure to do this will potentially delay the delivery of Site Reference CC16.

On this basis, a few minor alterations are proposed to the policy.

The principal change relates to the removal of the need to provide a public transport interchange on site, together with a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, the site occupies a highly sustainable location and significant improvements have been made to public transport accessibility in recent years, principally the inclusion of a bus stop on Canary Fields and a bus gate between Geoffrey Watling Way and Koblenz Avenue. Accordingly, whilst it is acknowledged that any development will need to demonstrate how it will connect and be accessible by public transport, the requirement to provide a public transport interchange is considered unnecessary. It will also, depending on what is required to deliver a public transport interchange, potentially result in the development being unviable.

The policy also states that any proposal will be required to provide a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, whilst the redevelopment of the Norwich East area is supported, its delivery is completely independent from the development of the land covered by site allocation CC16. In addition, given the strategic nature of the Norwich East area, the public transport improvements for this area are likely to be significantly greater than those required on land immediately to the east of Norwich City Football Club. Therefore, the requirement to provide a public transport strategy for the wider Norwich East areas as part of the development of site allocation CC16 would be both unreasonable and disproportionate.

Notwithstanding the foregoing, to ensure that the development of site allocation CC16 facilitates both pedestrian and public transport accessibility to the Norwich East area, it is recognised that any proposal must demonstrate how it would facilitate future links with the adjacent site.

## Revised Policy Wording

**POLICY CC16 Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way, Norwich (approx. 2.23ha) is allocated for mixed use development to include residential, leisure, community, office and ancillary small retail uses. This will accommodate a minimum of 270 homes, of which at least 76 (or 28%) should be affordable.**

The development will achieve the following site-specific requirements:

- Achievement of a high quality, locally distinctive and energy and water efficient design of a scale and form which respects its riverside context, has regard to its location on the edge of the Bracondale Conservation Area, ensures a high level of flood resilience and incorporates appropriate mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding);
- ~~Provide a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area.~~ *Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area.*
- ~~Provide public access to the river and a riverside walk/cycle link to facilitate the re-routing of national cycle route 1 / red pedalway to Whittingham and connections to the regeneration opportunity sites to the south and east including the Deal Ground, the Utilities site and Carrow Works.~~
- ~~Enhance the river frontage as a gateway to Norwich city centre~~
- Be designed to mitigate the impact of noise generation, light and odour pollution from adjacent industrial uses and the railway
- High quality green infrastructure, landscaping, planting and biodiversity enhancements ~~particularly along the river edge and~~ forming a setting for the stadium;

Strikethrough = deleted text

Red = revised wording.