

Greater Norwich Local Plan Regulation 18 Draft Local Plan – Part 2 Site Allocations Consultation Response for Van Dal Footwear Ltd

March 2020

1.0 Introduction

- 1.0.1 Norwich City Council, in collaboration with neighbouring Councils, are producing a revised Local Plan, The Greater Norwich Local Plan (GNLP). Lanpro are instructed by Van Dal Footwear Ltd who own the Van Dal Shoe Factory Site (shown on the site location plan at Appendix A) to make representations to the emerging Plan. We submit these representations in support of proposed continued allocation of the site.
- 1.0.2 These representations cover Context (page 1) and Comments on Policy R17 'Van Dal, Dibden Road' (page 2).
- 1.0.3 Our comments on Policy R17 cover key points:
- Approach to retention/reuse of existing buildings (page 2);
 - Development Specification (page 2);
 - Views (page 3); and
 - Dwelling Yield (page 4).
 - Suggested Policy Wording (page 4)

2.0 Context

- 2.0.1 The Site benefits from an existing site allocation in the Norwich City Council Local Plan, Policy R17 'Van Dal, Dibden Road'. The adopted policy and subtext, including a map, are appended to this submission for reference (Appendix B).
- 2.0.2 Van Dal Footwear Ltd, as the owner of the site, can confirm the site is suitable and available for redevelopment to provide residential properties.
- 2.0.3 We are currently in pre-application discussions with Norwich City Council Officers and Historic England regarding redevelopment of the site. The comments in this submission are informed by discussions through the pre-application process to date.

3.0 Comments on Policy R17 'Van Dal, Dibden Road'

3.0.1 The emerging Plan continues to recommend allocating the Van Dal, Dibden Road site for residential development, however, there are proposed changes to the Planning Policy and its subtext. There are four key areas we wish to comment on in this submission:

- Approach to retention/reuse of existing buildings;
- Development Specification;
- Views; and
- Dwelling yield.

3.1 Approach to retention/reuse of existing buildings

3.1.1 The emerging policy states:

The existing locally listed building should be retained or converted...

The local listing status has not been subject to any update or review. Through the course of our pre-application discussions we have researched the local listing and can confirm that the building no longer meets with the criteria against which it was originally judged. We would suggest that the Local Listed reference be removed from the emerging policy and the heritage merits of the building being considered through the planning process. We also consider that the Local Plan can not continue to make reference to buildings being local listed when the assessment work was undertaken by a third party in 2011. The passage of time with potential deterioration of buildings, changing circumstances and direction of travel for planning policy would indicate that the 2011 assessments are not evidence that can be relied upon for the new Local Plan.

A letter from the Norwich Society, included at Appendix C of this submission, outlined that should the building lose its active use as a shoe factory this will result in its loss of community value and result in it no longer meeting the criteria the local listing. This would it result in the building being removed form the Local List.

3.1.2 As stated above we do not consider that the building meets with the criteria of the local listing status that has been placed on it, however we welcome that the Council has acknowledged that any possible retention or conversion of the existing building will be subject to viability considerations.

3.1.3 It is not appropriate to require the retention of the building, either in total, or in part, as there is no evidence to suggest this can viably be done. Pre-application discussions to date explore the possibility of retaining parts of the locally listed building, as well as removing it.

3.1.4 For the purposes of clarity, we consider the first bullet point of the emerging policy should be deleted.

3.2 Development Specification

- 3.2.1 The emerging policy (included at Appendix D for reference) seeks to introduce additional development criteria, as follows:
The policy outlines that new buildings should achieve:
- high quality design;
 - be locally distinctive; and
 - use energy and water efficient measures.
- 3.2.2 Whilst these criteria may be appropriate for the site, we suggest that it is not necessary or helpful to include them within the policy text. The basis for this is that we consider the requirements are replicated elsewhere within the plan.
- 3.2.3 We do not consider that this site requires a higher quality of design, a more locally distinctive design, or needs more efficient energy or water measures than other sites within the Plan. Including these criteria within the site allocation policy could allow for misinterpretation in this regard.
- 3.2.4 The second bullet point of the proposed allocation should be removed.

3.3 Views

- 3.3.1 The adopted policy subtext references the opportunity for new development to make the best of potential for views over the city. This relates to future occupiers of the scheme benefiting from views over the city.
- 3.3.2 The emerging policy text states that development should 'protect and enhance significant long views across the city (as identified in Appendix 8 of Norwich Development Management Policies Local Plan (Adopted December 2014, or successor document))'. This causes us concern for two reasons: firstly, the re-wording could be mis-interpreted as referring to views from the city, towards the site, which we understand are non-existent; and secondly we consider the language of 'protect and enhance' could result in confusion regarding the context of the views.
- 3.3.3 The requirement to 'protect' or 'enhance' in the context of planning applications is commonly associated with the need to protect heritage assets of the highest significance (in line with NPPF paragraph 194) and enhance development within conservation areas, or in the setting of heritage assets (in line with NPPF paragraph 200).
- 3.3.4 The map showing long views referred to in Appendix 8 of the Norwich Development Management Policies Local Plan is included at Appendix E of this submission for reference. It shows long views from residential areas to specific heritage assets within the City. The views are one-directional. The site is not identified as an area on this map. We consider that reference to the map is therefore unhelpful. Reference to it should be removed to avoid confusion.
- 3.3.5 We would suggest that if the Council wishes to include something on views in the policy text itself, or indeed, in the subtext, the phrasing from the adopted subtext would be appropriate in place of the suggested third bullet point. The relevant adopted text that we suggest could be used is:

'New development should be designed to integrate well with surrounding housing and to make the best of the potential for views over the city'.

- 3.3.6 The intention of this and its relevance to the redevelopment of the site need to be clarified and challenged from a heritage perspective. Furthermore, the emerging policy makes reference to a successor document, there is no detail on what that would be or what it would be aiming to achieve. It would ultimately have its own statutory status and therefore there is no need to reference that document in this emerging policy.

3.4 Dwelling Yield

- 3.4.1 The emerging policy advises that the site should deliver at least 25 units, we think that this is a low number, considering the design exercise we have been through at pre-application stage. We would be comfortable with the Council adopting a higher number of units for this site. Whilst development needs to respond to the surrounding urban context, this is a brownfield site, in a very sustainable location, within the urban area of Norwich, outside of conservation areas. It is our view that the site can and should be redeveloped at a high density.
- 3.4.2 The NPPF places great importance on making effective use of brownfield land. Paragraph 17 requires local authorities in their plan making capacity to make as much use as possible of previously-developed or 'brownfield' land. Paragraph 122 of the NPPF is clear that planning policies should support development that makes efficient use of land.
- 3.4.3 Furthermore, the character of the surrounding area includes a mix of high density flats and houses and therefore a continuation of this outcome would be an appropriate response to redeveloping the site. The pre-application work that has been undertaken to date with the Council has been informed by market intelligence. There is no evidence provided by the Council to suggest that a lower density scheme than is surrounding the site would be attractive to housebuilders. The locality is not a high value area and smaller units, provided through flats or houses, in a high density layout will be the most likely option to provide an attractive return for a developer. We suggest that a minimum of 50 dwellings is achievable across the site. The policy wording should be updated to reflect this.
- 3.4.4 We also note that the policy text includes reference to the provision of 33% affordable housing, this reference should be removed. The provision of affordable housing is dictated by a stand alone policy and if applied directly to site allocation text we would expect that the Council have undertaken specific viability testing to establish that this level of affordable housing is deliverable. This level of viability testing has not been undertaken by the Council and therefore it is inappropriate to place the reference in the policy text.

3.5 Suggested Policy Wording

3.5.1 We suggest that the emerging policy should be amended to the following:

POLICY R17 Site of former Van Dal Shoes, Dibden Road, Norwich (approx. 0.54ha) is allocated for residential development. ~~This will accommodate a minimum of 25 homes, of which at least 8 (or 33%) should be affordable.~~

The development will achieve the following site-specific requirements:

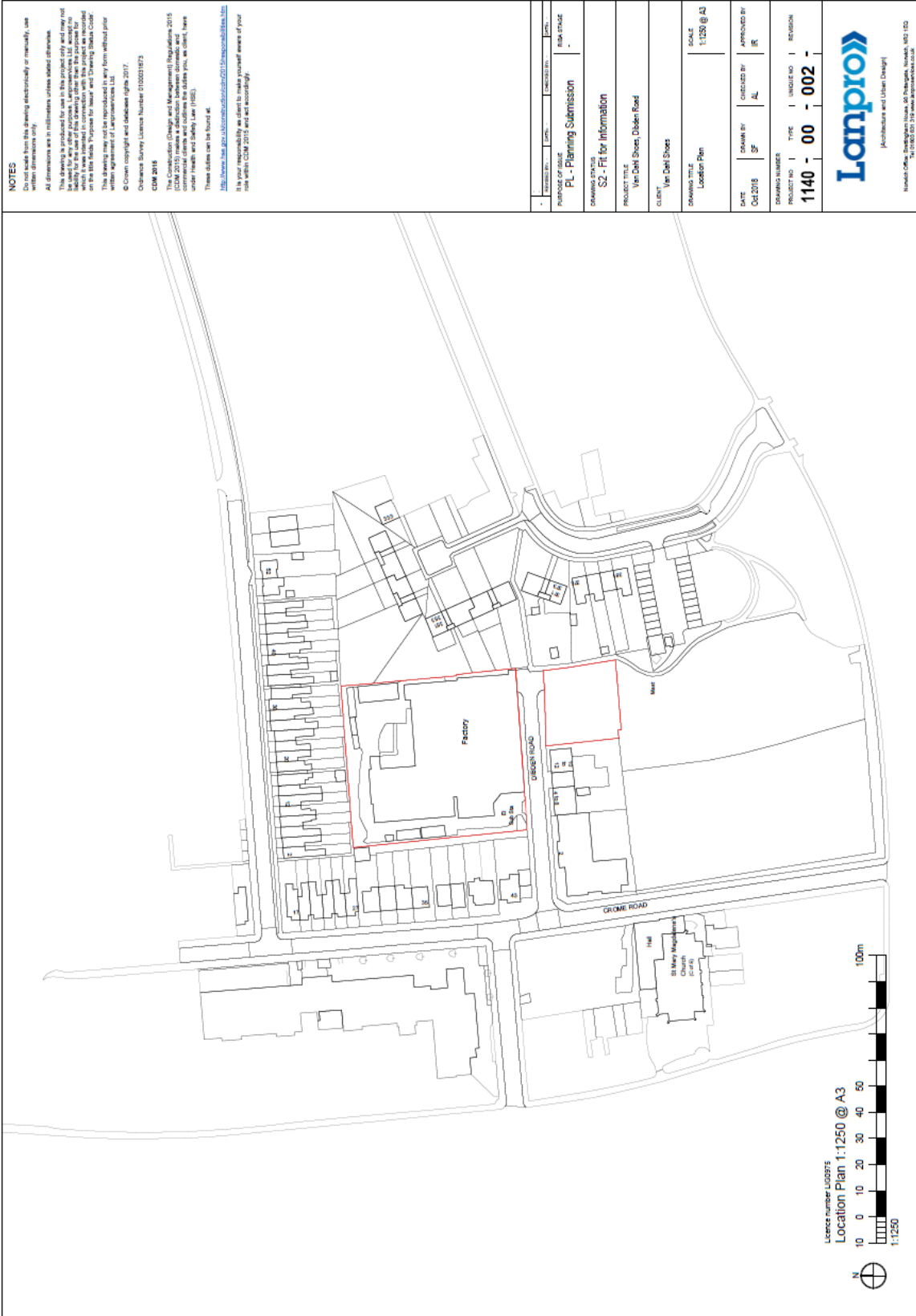
- ~~The existing locally listed shoe factory building should be retained or converted, subject to viability. To this end an assessment of its suitability for conversion either in part or as a whole (taking account of the industrial heritage significance of the site) will be required;~~
- ~~Where new buildings are proposed they should achieve high quality, locally distinctive, energy and water efficient design of a scale and form which reflects its prominent location and the character and context of the surrounding predominantly residential area.~~
- ~~Development should protect and enhance significant long views across the city (as identified in Appendix 8 of Norwich development management policies local plan (Adopted December 2014, or successor document));~~
- New development should be designed to integrate well with surrounding housing and to make the best of the potential for views over the city'.
- Site contamination arising from the former manufacturing use should be addressed and mitigated;
- Address access issues, including the potential stopping up or diversion of the highway subject to maintaining a pedestrian link across the site;
- Provide enhanced pedestrian and cycle links to Mousehold Avenue and Gertrude Road;
- Be designed to promote biodiversity and facilitate green infrastructure links to neighbouring green spaces and connections to Mousehold Heath. Existing trees on site should be retained and protected where practicable.

Notes R17:

The site was allocated in the previous Local Plan but has not yet been developed. The principle of development on the site has already been accepted, and it is expected that development will take place within the new local plan time-period up to 2038. The site is re-allocated for residential development. As an existing allocation it has been considered in the calculation of the housing requirement.

The site is likely to accommodate at least ~~25~~ 50 homes. Subject to viability considerations this should ~~This will~~ include affordable housing providing a mix of affordable tenures consistent with identified needs at the time of submission of a planning application ~~and subject to viability.~~ More dwellings may be accommodated, subject to an acceptable design and layout etc. being achieved.

Appendix A: Site Location Plan



Appendix B: Norwich City Council Adopted Local Plan Extract: Site Allocation R17 'Van Dal Shoe Factory' Policy and subtext

Description

This brownfield site consists of two storey industrial buildings with associated outbuildings on the northern part of the site and a surface parking area to the south. There is an adopted road central to the site which splits the two areas of land and the sites including the road extend to 0.54 hectares. The site is currently in use as a shoe factory with a factory retail outlet. The historic factory backs onto the footpath along Dibden Road. This site is located in a residential area largely surrounded by a mixture of terraced houses and flats. There is a new hostel development to the south-west of the site and open space to the south.

Explanatory text

The site provides the opportunity for new housing on a brownfield site with excellent access to employment opportunities and services in the city centre and nearby shopping facilities on Sprowston Road and at the Anglia Square large district centre. Housing development is suitable on this site within a predominantly residential area.

The heritage significance of existing locally listed buildings should be recognised and assessed to consider whether they are suitable for conversion in part or as a whole. Following assessment development should involve either conversion of the existing locally listed buildings or redevelopment if this is not practical. If redeveloping the site, the heritage significance of the locally listed buildings should be recorded and included on the Heritage Environment Record. Some form of heritage interpretation to commemorate the former use of the site would be appropriate in redevelopment proposals. New development should be designed to integrate well with surrounding housing and to make the best of the potential for views over the city.

Prior to development, assessment and remediation of any possible contamination should take place. Development must also take account of the existing electrical substation fronting Dibden Road and the mast on the open space to the south. Consideration should also be given to the retention of trees in the north of the site which provide amenity value to this part of the site and wider area.

Development will need to address access issues including the potential stopping up or diversion of the highway. Existing pedestrian links should not be affected and pedestrian and cycle links should be enhanced, linking to Mousehold Avenue and Gertrude Road, providing a link to the pink route of the strategic cycle network. Footpath access to Gertrude Road from the end of Dibden Road should be retained.

A contamination assessment and any necessary mitigation measures are required.

The site lies within a Critical Drainage Catchment as identified on the Policies map. Therefore development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flooding in accordance with policy DM5.

Deliverability

The site is being promoted for housing development by the land owner and is likely to be available for development within the plan period.

POLICY R17: Van Dal Shoes, Dibden Road – housing development

The site (0.54 hectares) is allocated for housing development. Depending on the nature of the scheme in the region of 20 to 25 dwellings will be provided on this site through conversion of locally listed buildings or new build.

An assessment the heritage significance of existing buildings on-site to consider whether they are suitable for conversion in part or as a whole will be required.

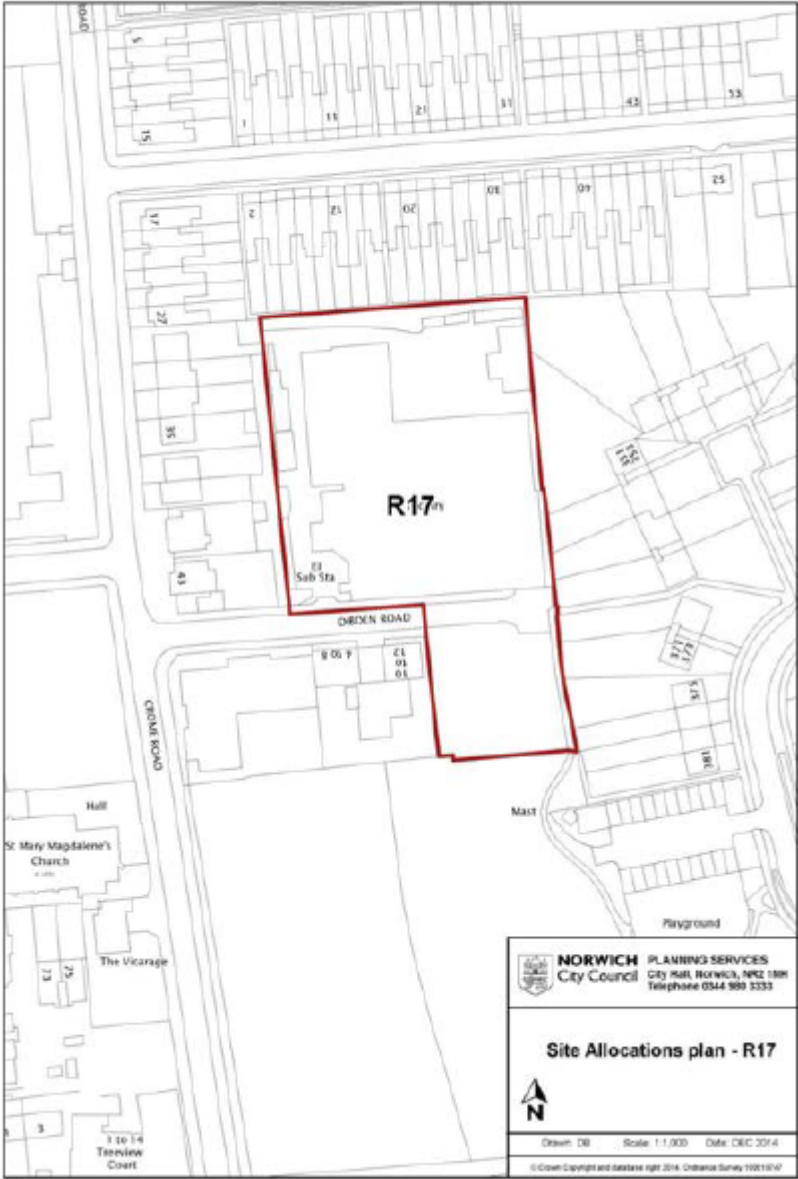
Development will:

- address access issues including the potential stopping up or diversion of the highway;
- provide enhanced pedestrian and cycle links to Mousehold Avenue and Gertrude Road;
- be designed to promote biodiversity links between neighbouring green spaces, and to take account of existing trees on-site and the site's prominent location.

A surface water management assessment should be submitted with any application proposing development in accordance with this allocation. The assessment should show how the proposed development:

- a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows, and;
- b) would, wherever practicable, have a positive impact on the risk of surface water flooding in the wider area.

Site plan



Appendix C: Letter from the Norwich Society



THE NORWICH SOCIETY

(Founded 1923)

President: The Lord Mayor of Norwich

Registered Charity No: 311118

The Assembly House, Theatre Street, Norwich NR2 1RQ

Telephone 01603 765606

email: admin@thenorwichsociety.co.uk

website: <http://www.thenorwichsociety.co.uk>

Simon Goodman
The Florida Group Ltd
Head Office
Dibden Road
Norwich NR3 4RR.

April 30 2012

rec'd 1.5.2012

Dear Mr Goodman

Florida Shoe Factory - Local Listing

Following your most welcome attendance at one of the Conservation and Development meetings, Clare and I consulted again. We are unwilling to reduce the rating any lower than 9 but should the factory cease to trade it would immediately lose Community Value and therefore come off the list. I hope this is a satisfactory conclusion as we will soon be going to print with the final version.

I would like to reiterate that Local Listing has *no legal weight* and does not preclude the development of the site

Yours sincerely

Victoria Manthorpe
Secretary to the Trustees of the Norwich Society

Appendix D: Emerging Greater Norwich Local Plan text (Reg 18) January 2020

POLICY R17 Site of former Van Dal Shoes, Dibden Road, Norwich (approx. 0.54ha) is allocated for residential development. This will accommodate a minimum of 25 homes, of which at least 8 (or 33%) should be affordable.

The development will achieve the following site-specific requirements:

- The existing locally listed shoe factory building should be retained or converted, subject to viability. To this end an assessment of its suitability for conversion either in part or as a whole (taking account of the industrial heritage significance of the site) will be required;
- Where new buildings are proposed they should achieve high quality, locally distinctive, energy and water-efficient design of a scale and form which reflects its prominent location and the character and context of the surrounding predominantly residential area.
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NORWICH

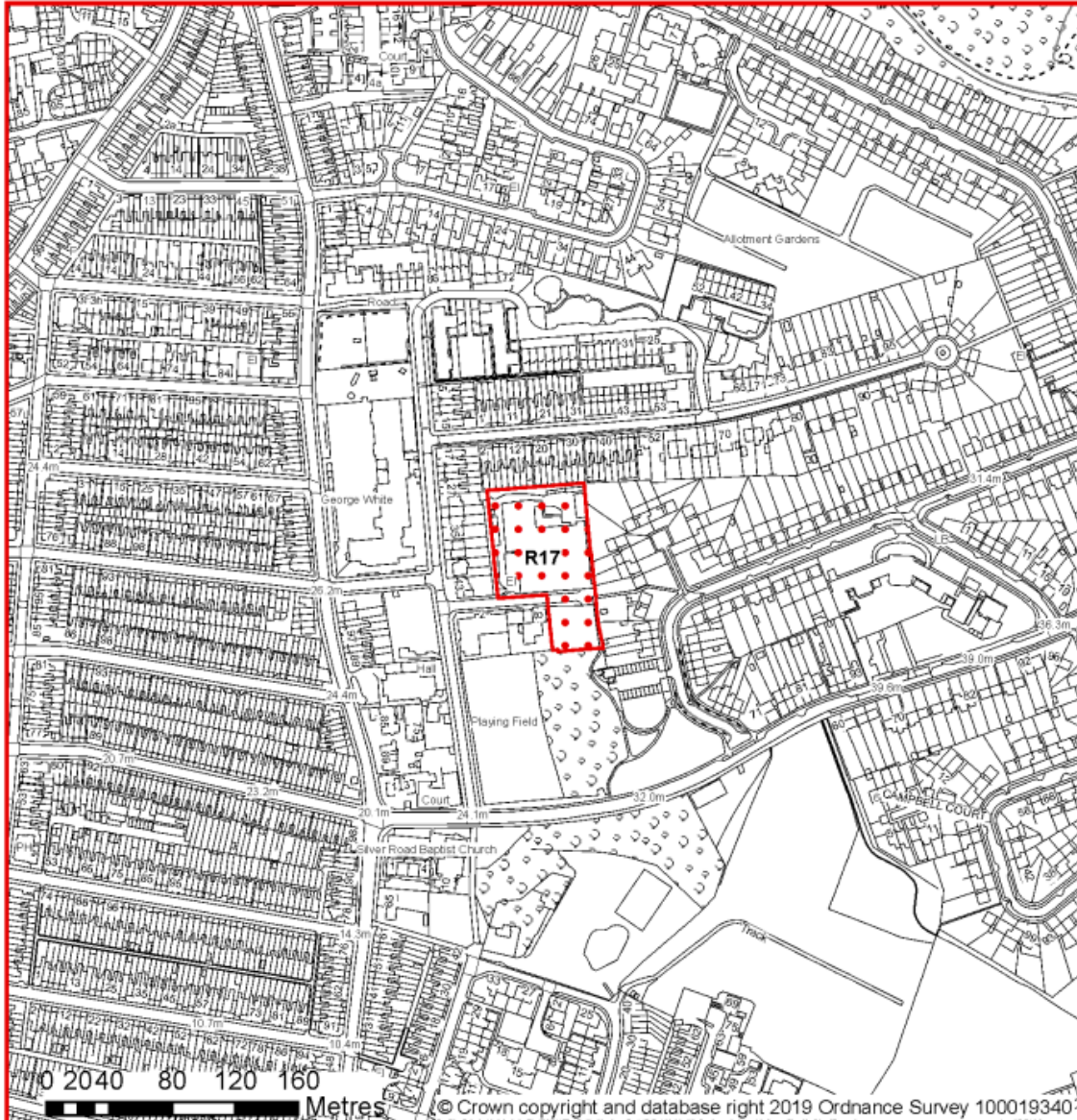
Site Reference R17
 Location Site of former Van Dal Shoes, Dibden Road
 Allocation Residential Development (Approx. 25 homes)
 Area 0.54 ha

Greater Norwich Local Plan
 Carried Forward Allocation

(Also shown as commitments
 on other maps)


 N
 1:3,500
 @ A4

Date: 31/10/2019



Carried forward Housing Allocation

Appendix E: Norwich Development Management Policies Local Plan Long Views

