

Mr Mike Burrell
Greater Norwich Development Partnership

16 March 2020

Submitted electronically at: <https://www.gnlp.org.uk/>

Ref:1947

Dear Mike,

Greater Norwich Local Plan Regulation 18, Stage C Draft Strategy and Site Allocations – St Georges Works (GNLP2114), Norwich City Centre

Background

1. These representations are submitted on behalf of Our Place to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process and relate to land at St Georges Works, Norwich, which is being promoted for mixed use redevelopment by the owner, Our Place.
2. Our Place is pleased to note that St Georges works has, in reflection of its sustainable location and the owner's intentions to deliver the site within the Plan Period to 2038, been allocated under policy GNLP2114 for residential mixed-use redevelopment within the Regulation 18, Stage C Draft Strategy and Site Allocations Document.
3. However, noting the lack of viability or deliverability information supporting the draft strategy or allocations, Our Place question whether the specificity of the quantum within the draft allocation is justified and as such, recommend alternative wording to the allocation to allow for greater flexibility on this point.
4. Where relevant and appropriate to the proposed allocation, Our Place also comment on the wording of the draft Strategic Policies contained within the Regulation 18, Stage C Consultation Document.

Summary of Development Potential

5. The site is located to the north of Norwich City Centre. It comprises circa 0.6ha and is bound to the south by Colgate, to the west by Duke Street and to the east and north by Muspole Street (see **Appendix 1**).
6. The central and eastern part of the site was previously allocated under the Norwich City Centre Area Action Plan for residential-led regeneration (Policy GC1). 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.
7. Policy CG1 required any future redevelopment proposal to include a mix of family housing and flats, with a minimum of 40 dwellings, and include the conversion of the former shoe factory. The developer was also required under the allocation to fund enhanced landscaping to create a square with pedestrian priority between Muspole Street and St George's Plain.

8. Planning permission was granted in 2008 and later extended in December 2012 for the redevelopment of the allocation site for 47 apartments and 10 houses together with new external spaces and parking areas. The development was never 'built out'.
9. Prior notification applications were also approved for the change of use of Seymour House and the Guildyard, 51 Colgate, located either end of the proposed allocation site. The planning permission and prior notification proposals required careful handling of a number of site specific and local constraints, not least the site's relationship with surrounding listed buildings, and potential complex and costly conversion works.
10. A number of buildings that were subject to prior notification approvals have, in recognition of these constraints, been beneficially refurbished and occupied as serviced office space.

Response to draft Proposed Allocation and Draft Strategy

11. In order to allow future development to respond positively to site specific and local development 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.
12. 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."*
13. 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.
14. Whilst Our Place concurs with the Council's conclusion that the site is sustainable, suitable and deliverable for mixed use redevelopment, the proposed allocation does not appear to be supported by any market or viability evidence to justify the quantum of uses or Section 106 requirements that it specifies.
15. National planning policy guidance is clear in stating that policy requirements of Local Plans should be informed by evidence of need, and a proportionate assessment of viability that takes into account all relevant policies.

Affordable housing and viability

16. With specific reference to affordable housing, it is noted that the Council is yet to publish any viability evidence or any local needs assessment that demonstrates that a 28% affordable housing contribution for the majority of sites across the City Centre as specified under Policy 5 is a deliverable policy objective.
17. As such, whilst Our Place are committed to the delivery of much needed affordable housing across a range of tenure types, they object to the imposition of a 28% affordable housing requirement under draft Policy GNLP2114 in the absence of any supporting viability evidence.
18. They are willing to cooperate with the Council and contribute positively to any reviews focusing on viability evidence to enable the delivery of affordable housing should this be requested.

19. Our Place note that 82% of the housing requirement for the emerging Local Plan that has been set out to 2038 within the Regulation 18, Stage C consultation document is made up of rolled forward allocations or sites with planning permission. There is no evidence, however, provided with the Regulation 18, Stage C consultation document to demonstrate the deliverability of these sites and therefore the strategic housing priorities of the emerging plan overall.
20. The lack of any deliverability or viability evidence supporting the Regulation 18, Stage C consultation Document raises questions over the appropriateness of the quantum specified within its draft allocations (including Draft Policy GNLP2114).

Site specific representations

21. In the absence of the evidence mentioned previously, and to ensure the deliverability of the proposed allocation, it is important that Draft Policy GNLP2114, relating to St Georges Works:
 - a. Acknowledges and provides positive and flexible options for dealing with known environmental and economic constraints;
 - b. Advocates a deliverable development scenario that is not so prescriptive so as to constrain future development;
 - c. 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; and
 - d. Promotes the delivery of sustainable development through giving appropriate regard to the need for environmental, social and economic improvements at the site.
22. In order to meet these objectives and prior to any evidence on the deliverability or viability of the Council's draft Strategic Policies being published, Our Place recommend that the changes shown in the paragraphs below be made to draft Policy GNLP2114 as currently worded.

POLICY GNLP2114

*Land at and adjoining St Georges Works, Muspole Street (approx. 0.57 ha) is allocated for residential-led mixed use development. This has the potential to provide ~~a minimum~~ **in the order of** 110 homes, of which ~~at least 31 homes (or 28%)~~ **should be affordable (subject to viability)**, together with ~~a minimum of 5000sqm new office and managed workspace~~ **employment uses** and potentially other ancillary uses such as small-scale retailing.*

The development will achieve the following site-specific requirements:

- *Retention and conversion of the existing former factory buildings on site subject to **demonstrating a proposal's viability, and deliverability;***
- *New build development, if proposed, to achieve a high quality locally distinctive and energy and water-efficient design which reinstates a strong built frontage along the west side of Muspole Street and respects the historic character of the area and the heritage significance of this part of the City Centre Conservation Area.*
- *Impacts of proposed development on existing residents and local businesses, including pubs, to be minimised.*



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- *Key views toward the tower of St Georges Colegate to be protected and enhanced*
- *High quality landscaping and biodiversity enhancements to be provided on site, with scope for off-site contributions to public realm improvements and the creation of a new pedestrian square between Muspole Street and St George's Plain;*
- *Car free or low-car development in accordance with Policy 2 is appropriate **for certain uses** in this location*

Conclusion

23. The site owner is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be deliverable and suitable for mixed use development that can come forward within the plan period to 2038.
24. However, in light of potential fluctuations in market conditions and noting the lack of viability or deliverability information supporting the draft Plan, they question the justification for the quantum specified within draft allocation GNLP2114 and respectively request that it be reworded to ensure that it promotes and does not constrain, the scale, form, mix and timing of the site's future development.

Yours sincerely

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Appendix 1 – Site Boundary Plan



ST GEORGE'S WORKS

EXISTING SITE BOUNDARY 1_500 A3