

22 March 2021



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Dear Sir/Madam

**NELSON HOTEL, NORWICH – PRINCE OF WALES RD, NORWICH NR1 1DX
REGULATION 19 PRE-SUBMISSION CONSULTATION GREATER NORWICH LOCAL PLAN (GNLP)**

Savills is instructed by Whitbread PLC ('the client') to respond to the Pre-Submission Draft Greater Norwich Local Plan (GNLP) consultation which has been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This letter sets out our representation to this plan.

1.0 Background and Context

Our client is the owner of the Premier Inn Nelson Hotel on Prince of Wales Road within Norwich City Centre. Premier Inn offer over 800 hotels in the UK and 76,000 rooms in numerous locations. There are also hard and soft landscaping areas that the client has an interest in, and sit adjacent to the hotel.

The Premier Inn Nelson Hotel forms part of a mixed use site allocation identified as Policy CC4b. Whitbread has recently entered into discussions with the Norwich City Council ('the Council') regarding the future redevelopment of this hotel and the surrounding context.

Discussions have included three detailed pre-application meetings in 2019, one of which included Historic England. The meetings were extremely productive, with discussions focused on land uses, scale and massing, heritage assets, landscaping and highways matters. These meetings had together provided enough information and feedback to develop an indicative scheme which the Council were supportive of in principle. Due to the impact of coronavirus on the client and wider hotel industry, the progression of the project was understandably put on hold, however, it is one that will undoubtedly be going ahead in the near future.

The redevelopment would seek to provide a large scale development with a mix of uses that could include Use Class C1 (Hotel), C3 (Residential), C2 (Student Accommodation), C2 (Residential Care Home), B1a (Office), A1 (Retail) and A3 (Restaurants and Cafes).

We submitted a representation in respect of the Stage C – Regulation 18 Draft Plan consultation in March 2020 (**Appendix 1**). The representation welcomed and supported the Policy CC4b site allocation, however included comments relating to location of historic buildings, land uses, the private garden adjacent to the hotel and landmark buildings. Comments were also made on affordable housing and purpose-built student accommodation within Policy 5 (Homes) and the 'City Centre' section of Policy 7.1 (Norwich urban area including the fringe parishes).

With the above in mind and the clear commitment for the redevelopment of this site by the client, we want to ensure that the future policies are consistent with what can actually be delivered on this site and avoid a situation where policy is too stringent and not flexible for future redevelopment.

2.0 Consultation and Policy

Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the GNLP, and have recently published the Pre-Submission Draft Plan (Regulation 19) for representation on soundness and legal compliance. The consultation runs for seven weeks and expires on 22 March 2021.

Our representation focuses on the Sites Plan part of the GNLP, and specifically Policy CC4b, which has identified the site within an allocation for large scale mixed use development. For completeness, Policy CC4b and the associated plan has been outlined below:

POLICY CC4b Land Mountergate/Prince of Wales Road (Mountergate East, approx. 2.39 ha) is allocated for mixed-use development. This may accommodate a minimum of 200 homes, together with student accommodation, high quality office space, hotel and tourism uses, and other supporting main town centre uses taking advantage of the site's proximity to the rail station and river.

The development will achieve the following site-specific requirements:

- *Development to be approached comprehensively to achieve effective integration of the historic buildings in the western part of the site into the overall development. **(Bullet Point 1)***
- *Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), student accommodation, educational facilities to support the adjacent Charles Darwin Primary Academy, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening economy. **(Bullet Point 2)***
- *Achievement of a high quality, locally distinctive design of a scale and form which respects its location within the City Centre Conservation Area and adjacent to the St Matthews Conservation Area, conserves and enhances adjoining heritage assets and their settings and contributes to an overall enhancement of townscape quality. The site's position relative to Norwich Train Station warrants building of notable standard of design and quality worthy of marking arrival into the city. **(Bullet Point 3)***
- *Development will respect and enhance the setting of on-site historic buildings including St Faiths House and the Weavers House and off-site buildings including the Train Station, Anglican Cathedral and Castle, and be designed as far as possible to reflect historic building plots and street lines and to recreate street frontages **(Bullet point 4)***
- *Redevelopment, conversion or change of use of Baltic House for uses consistent with this policy will be supported if it becomes available in the plan period **(Bullet Point 5)***
- *A density of development commensurate with its location close to the train station mobility hub with a design that secures a significant overall reduction in the level of off-site surface car parking **(Bullet Point 6)***
- *Provides an enhanced public realm, including public open space and legible and permeable pedestrian/cycle routes to link through the adjoining site CC4a to Rose Lane and the new St Anne's Quarter development to King Street. A link should be provided from Mountergate to the river connecting with Prince of Wales Road via an extended and widened riverside walk in accordance with policy 7.1 and the 'River Wensum Strategy', making the most of its riverside location **(Bullet Point 7)***
- *Retention and provision of public access and public open space to the rear of the Hotel Nelson **(Bullet Point 8)***
- *A noise assessment is required, and the development must be designed to mitigate the impact of noise from the main road and from the late-night activity zone **(Bullet Point 9)***
- *High quality green infrastructure, landscaping, planting and biodiversity enhancements particularly along the river edge taking advantage of its riverside context and location in respect to the Broads National Park **(Bullet Point 10)***
- *Protection of bankside access for maintenance purposes. **(Bullet Point 11)***
- *Development should ensure a high level of flood resilience and incorporate appropriate mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding). **(Bullet Point 12)***

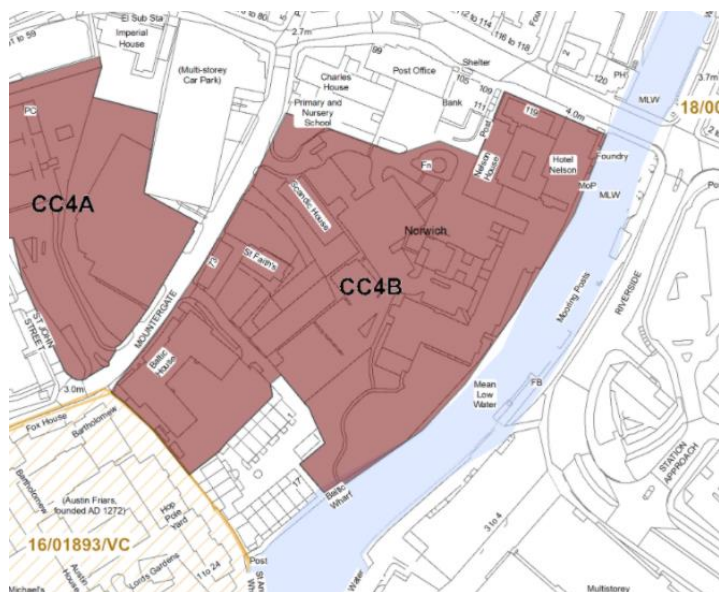


Figure 1 - Policy CC4b Site Allocation Map

3.0 Representation

Our representation below focuses on the detail site specific requirements of Policy CC4b, and any amendments or clarification that we consider would be beneficial for the soundness of the plan. We have also made comments on Policy 5 (Homes) and Policy 7.1 ((Norwich urban area including the fringe parishes) of the Strategy Document.

Our comments seek to build upon are previous Regulation 18 representation (**Appendix 1**) and the Statement of Consultation which was included within this consultation.

Site Allocation (Policy CC4b – Land Mountergate/Prince of Wales Road)

As per our previous representation, we welcome and support site allocation Policy CC4b in principle, however we want to ensure that the contents of the policy is consistent what our client is aiming to build out on site and that correct terminology is used within the policy text. The following changes reflect detailed work that has already been undertaken on the plans to redevelop the site with the Council at pre-application stage.

- In terms of the initial text for Policy CC4b, we note that the following sentence has been removed from the introductory text:

“to provide affordable housing in accordance with policy 5, subject to viability considerations;”

As affordable housing and viability matters are picked up by general overarching Policy 5 (Homes), we don’t consider that the removal of this text impacts the soundness of the site allocation. However, we would note that any future affordable housing offer should be subject to viability testing in line with the NPPF. Please also refer to our comments on Policy 5 below.

- With regard to Bullet Point 2, whilst we support the land uses which have been mentioned within the allocation, we would like to strongly emphasis the inclusion of the requested amendments which have not been picked up since our last representation.

As noted within our Regulation 18 representation, the inclusion of Class C2 residential care homes as an additional use and the removal of educational facilities to support the adjacent Charles Darwin Primary Academy reflects the nature of the uses that a more likely to come forward within the sites redevelopment.

In this respect, we requested that the wording be amended as follows:

‘Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), residential care homes, student accommodation, educational facilities to support the adjacent Charles Darwin Primary Academy, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening and night-time economy. Night-time economy uses should not dominate the development and should be located to protect the amenity of adjoining residential and commercial occupiers’

The above requests have not been included within the Regulation 19 Policy C44b text. In this respect, we have reviewed the GNLP Statement of Consultation and sourced the reasons why the requests were not included within the revised plan. The Statement of Consultation stated:

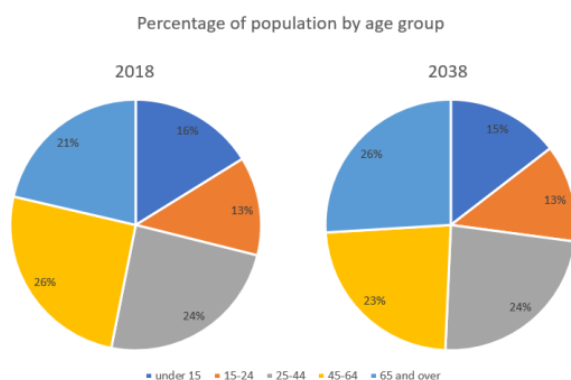
“C2 use class in this location adjacent to LNAZ is not considered appropriate policy requirement. Educational facilities relate to existing school on site – no change”

Following a review of the revised plan, it is clear that the designation of Late Night Activity’s Zone (LNAZ) will not be part of the GNLP and that this is a matter that is the responsibility of the Norwich City Council. In this respect, we have reverted to the LNAZ’s within the adopted local plan for Norwich City Council, which confirms that there are two (Riverside Leisure Quarter and Prince of Wales Road Area) LNAZ’s within proximity to the site (**Appendix 2**). Please note that we are also aware from Norwich City Councils Local Development Scheme (February 2021), that there may be a review of the adopted development plan policies following this consultation and therefore these designations may change.

Nevertheless, if the above two LNAZ locations are carried forward, we would disagree that Use Class C2 residential care homes are not considered appropriate in this location. As shown within the screenshots in Appendix 2, both the LNAZ have aspects which separate the areas from the site. In terms of the Riverside Leisure Quarter LNAZ, whilst this is the closer of the two zones, it is separated by the River Wensum and this arguably provides a sufficient separation distance from the site. Furthermore, future C2 uses could be designed away from this boundary and ensure that this particular LNAZ would not impact the care home use. In respect of the Prince of Wales Road LNAZ, it is considered that this is far enough away from the site to not warrant any issues between C2 uses and this LNAZ.

In terms of the demand for Use Class C2 uses, we would like to refer to other parts of the GNLP which clearly highlight the importance of older persons housing.

As set out with Paragraph 41 which relates to population mix, *“the population of Greater Norwich has relatively high proportions of older people compared to national figures and this pattern is set to increase to 2038 as shown in the charts below. Broadland and South Norfolk have proportions of older people significantly above the national average. Further growth of the older population will add to already significant pressure on residential and home care services, so it is important that the GNLP plans for changing housing needs.*



Further to the above, Policy 5 (Paragraph 276) *“supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing. Norfolk County Council’s strategy identifies the need for 2,842 additional extra care units by 2028. County wide evidence has identified the need for 3,857 specialist retirement units (sheltered, age restricted or extra care housing) in Greater Norwich between 2020 and 2038*

In addition, Policy 5 *supports delivery of older peoples’ and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. Development Management officers will ensure that the need for specialist housing for the elderly and other needs is considered on all housing schemes and advise applicants on the most up-to-date evidence of need (Paragraph 277).*

With the above in mind, we consider that the inclusion of residential care homes (Use Class C2) is acceptable within this location and is wholly in accordance with the strategy for housing within the GNLP.

A request was also made to remove the requirement to provide educational facilities to support the adjacent Charles Darwin Primary Academy on the site. The reason for this is fairly straightforward and based on the deliverability of the redevelopment of the site. As discussed within the pre-application meetings with the Council, there is a certain quantum of development (including hotel (re-provided), residential, student accommodation, residential care home, office, retail and restaurants and cafes uses) that the client requires for the redevelopment to work financially. The provision of educational facilities is not consistent with the quantum of development required and such a requirement could jeopardise the redevelopments deliverability. We would also note that the term ‘educational facilities’ is extremely vague and it would be unfair to attach such an onerous requirement for an educational facility that is outside of the clients ownership.

We hope that the above explanations are sufficient and request again that the wording of Bullet Point 2 can be amended to what was previously requested.

- In respect of Bullet Point 5, we would again like to clarify that Baltic House is not within the clients ownership, however any redevelopment scheme would not prejudice this building coming forward for development conversion or change of use.
- Bullet Point 8 relates to the retention and provision of public access and public open space to the rear of the Hotel Nelson.

Before we set out our comments relating to this point, we would note that the Regulation 18 plan stated:

“Retention and provision of public access to the currently private garden at the rear of the Hotel Nelson”

With the above in mind, we would refer again to our previous Regulation 18 representation which requested that this bullet point should be removed. Further to this, we have reviewed the Statement of Consultation and sourced the reasons why the requests were not included within the revised plan. The Statement of Consultation stated:

“The space whatever its precise current function is designated greenspace and makes a significant contribution to the conservation area and the river corridor. New development must enhance this benefit and the space should be public”

Before we set out our comments on the above, we would like to note that the greenspace is legally owned by the client and therefore it is not up to the Council to advise on if this space should be public or not. Whilst the current space is used by members of the public, this is not lawful and is associated with anti-social behaviour.

With the above in mind, we repeat our request that this bullet point should be removed. The reason for this, is that as part of any redevelopment scheme, this open space will be re-provided, and therefore the word 'retention' does not work in this regard. We would also point out that the redevelopment of the site will seek to improve the 'greenspace' and public realm throughout the site.

Furthermore, as noted above the current open space should be accessed by the public and therefore the word 'retention' does again not work in this respect. Finally, and as noted previously, we consider that site allocation Bullet Point 7 (which includes public realm and public open space) and Bullet Point 9 substantially cover the future landscaping requirement for any redevelopment.

- Within our Regulation 18 representation, we also requested that an additional Bullet Point (12, now 13) should be added to the policy and relate to the development of landmark buildings on the site.

This request has not been included within the revised plan and the reason below was provided within the Statement of Consultation:

Landmark building suggests inappropriate scale for this location and is not supported (landmark building policy removed from strategy policy 7.1), however wording added regarding noteworthy design to reflect sites location in proximity to train station and sense of arrival to city

As advised within the previous Regulation 18 representation, we consider that given the size and location of the site, it is considered that the site has the potential to accommodate a landmark building as part of the comprehensive high quality mixed use new community.

As discussed with the Council at previous pre-application meetings, there is a unique opportunity to include a taller element on the north-eastern corner of the site which provides a sense of arrival within the city and emphasises the high-quality nature of the townscape straight-away. This location is unique to other sites, and therefore we would disagree with the Councils remark that landmark building suggests inappropriate scale for this location.

We would also comment that a considerable amount of work has already gone into discussing the building scales with the Council and in this respect, it was considered that the proposals would sit in harmony with immediate context (St Faiths House, Weavers House, Norwich Train Station and St Annes Wharf), whilst also respecting the wider views that were noted by the Council (including Anglian Cathedral and Norwich Castle).

It is noted that text on landmark buildings has been removed from Policy 7.1, however please note we also respond to this below.

With the above in mind, we would again request that a further Bullet Point (13) be added to the site and ensure that the landmark building which has already been explored can be incorporated into the text.

Strategy Document (Policy 5 – Homes)

Policy 5 relates to affordable housing, space standards, accessible and specialist housing, gypsies and travellers, travelling show people and residential caravans, purpose-built student accommodation and self/custom-build.

Our previous Regulation 18 representation sought to comment on the sections relation to affordable housing and purpose-built student accommodation (PBSA). In terms of the first bullet point of this policy, we requested that the following wording (underlined) should be added:

“at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the

requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing, and subject to viability testing in line with the NPPF

The revised policy has been re-worked and now includes a section (b) relating to brownfield sites and affordable housing. This states:

“for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage;

- *affordable housing on-site except where exceptional circumstances justify off-site provision;*
- *a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;*
- *affordable housing of at least equivalent quality to the market homes on-site”*

We welcome the inclusion of viability text within the policy, however, would request the below amendment on the first bullet point to ensure that the viability testing as referred to within the NPPF is appropriately incorporated into the policy:

“affordable housing on-site except where viability assessments or exceptional circumstances justify off-site provision”;

In terms of the PBSA section of the policy, and the last bullet point of this section, we repeat a request for the following amendment to take account of sites already allocated for PBSA as part of a mixed use allocation and to ensure that double counting on affordable housing is avoided. We therefore suggest the following wording:

Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:

“.....make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing, unless the site has already been allocated for purpose built student accommodation or/and where part of the broader development scheme would deliver market housing and associated affordable housing as part of the development. Such provision may be made offsite through a commuted sum as set out in supplementary planning documents”

Following the above request, we have reviewed the Statement of Consultation and sourced the reasons why the requests were not included within the revised plan. The Statement of Consultation stated:

“The growing number of students living in Norwich has an impact on the availability of sites for affordable housing. Proposals for PBSA will therefore be expected to contribute to meeting the need for affordable housing by providing policy compliant levels of affordable housing, or commuted sum.”

Whilst we note that Norwich has undergone a shift in the growth of student accommodation, our request does not advise that PBSA would not be paid, however aims to ensure that double counting on affordable housing is avoided for mixed use allocations with PBSA within them. This request is in-line with Paragraph 57 of the NPPF which ensures that planning applications are viable.

Strategy Document (Policy 7.1 - Norwich urban area including the fringe parishes)

Policy 7.1 relates to Norwich urban area and the fringe parishes, and how they will be the areas major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal.

Our previous Regulation 18 representation sought to comment on the 'City Centre' section of the policy and specifically Point 3 specifically Point 3 (Leisure, culture and entertainment and the visitor economy) and Point 5 (The Natural and Built Environment). Our representation stated:

"Point 3 states:

Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre's role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs.

Given that the CC4b site allocation has an existing hotel that will be redeveloped as part of a future scheme, and sits in close proximity to an existing and future transport hub at Norwich Station and its surroundings, we welcome and support the above point.

Point 5 states:

New landmark buildings at the gateways to the city centre will be accepted where they are of exceptional quality and help to define or emphasise the significance of the gateway

We support the encouragement for gateway developments within the city centre in appropriate locations. It is considered that Policy CC4b site allocation is an appropriate location for a landmark building due its strategic location within the City Centre and its proximity to Norwich Train Station. This approach is in line with the principle so the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important"

We welcome that Point 3 has been retained within the revised plan. However, the point relating to landmark buildings has been removed and as referred to above (in Policy CC4b section) we disagree that a landmark reference should not be included within the policy.

Whilst we consider that the our site can include a landmark building and much work has already gone into the development of this with the Council. In terms of the wider City Centre we consider that well-designed landmark buildings should be encouraged and this approach is in line with the principle of the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important places.

4.0 Summary Conclusion

I trust my letter is clear and helpful, and that the Inspector will take full and proper account of our client's request and clear objectives. As stressed throughout the letter, a considerable amount of work has already gone into the development of a scheme on this site, and we hope that the Inspector can take the clients requests forward into the assessment of the soundness and legal compliance of the GNLP.

In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact me or my colleague, Edward James. We reserve the right to supplement or amend these comments in the future.

We would appreciate being kept closely informed of the progress of the GNLP.

Yours faithfully,

Nicola Forster
Director



Appendix 1 – Stage C Regulation 18 Draft Plan Representation (dated 16/03/2020)

16 March 2020



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Dear Sir/Madam

NELSON HOTEL, NORWICH – PRINCE OF WALES RD, NORWICH NR1 1DX REGULATION 18 DRAFT CONSULTATION GREATER NORWICH LOCAL PLAN (GNLP)

Savills is instructed by Whitbread PLC ('the client') to respond to the Draft Greater Norwich Local Plan (GNLP) consultation which has been published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This letter sets out our representation to this plan.

1.0 Background and Context

Our client is the owner of the Premier Inn Nelson Hotel on Prince of Wales Road within Norwich City Centre. Premier Inn offer over 800 hotels in the UK and 76,000 rooms in numerous locations. There are also hard and soft landscaping areas that the client has an interest in, and sit adjacent to the hotel.

The Premier Inn Nelson Hotel forms part of a mixed use site allocation identified as Policy CC4b. Whitbread has recently entered into discussions with the Norwich City Council ('the Council') regarding the future redevelopment of this hotel and the surrounding context.

The redevelopment would seek to provide a large scale development with a mix of uses to include Use Class C1 (Hotel), C3 (Residential), C2 (Student Accommodation), C2 (Residential Care Home), B1a (Office), A1 (Retail) and A3 (Restaurants and Cafes).

2.0 Consultation and Policy

Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the GNLP, and have recently published the draft GNLP (Regulation 18) for a six week consultation which expires on the 16 March 2020.

Our representation focuses on the Sites Plan part of the GNLP, and specifically Policy CC4b, which has identified the site within a site allocation for large scale mixed use development. We have also made comments on Policy 5 (Homes) and Policy 7.1 (Norwich urban area including the fringe parishes).

For completeness, Policy CC4b and the associated plan is outlined below:

POLICY CC4b Land Mountergate/Prince of Wales Road (Mountergate East, approx. 2.40 ha) is allocated for mixed-use development. This may accommodate a minimum of 200 homes, to provide affordable housing in accordance with policy 5, subject to viability considerations; together with student accommodation, high quality office space, hotel and tourism uses, and other supporting main town centre uses taking advantage of the site's proximity to the rail station and river.

- *Development to be approached comprehensively to achieve effective integration of the historic buildings in the central part of the site into the overall development; **(Bullet Point 1)***

- Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), student accommodation, educational facilities to support the adjacent Charles Darwin Primary Academy, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening and night-time economy. Night-time economy uses should not dominate the development and should be located to protect the amenity of adjoining residential and commercial occupiers. **(Bullet Point 2)**
- Achievement of a high quality, locally distinctive design of a scale and form which respects its location within the City Centre Conservation Area and adjacent to the St Matthews Conservation Area, conserves and enhances adjoining heritage assets and their settings and contributes to an overall enhancement of townscape quality. **(Bullet Point 3)**
- Development will respect and enhance the setting of on-site historic buildings including St Faiths House and the Weavers House and off-site buildings including the Train Station, Anglican Cathedral and Castle, and be designed as far as possible to reflect historic building plots and street lines and to recreate street frontages, **(Bullet Point 4)**
- Redevelopment, conversion or change of use of Baltic House for uses consistent with this policy will be supported if it becomes available in the plan period; **(Bullet Point 5)**
- A density of development commensurate with its location close to the train station mobility hub with a design that secures a significant overall reduction in the level of off-site surface car parking; **(Bullet Point 6)**
- Provides an enhanced public realm, including public open space and legible and permeable pedestrian/cycle routes to link through the adjoining site CC4a to Rose Lane and the new St Anne's Quarter development to King Street. A link should be provided from Mountergate to the river connecting with Prince of Wales Road via an extended and widened riverside walk; **(Bullet Point 7)**
- Retention and provision of public access to the currently private garden at the rear of the Hotel Nelson; **(Bullet Point 8)**
- High quality green infrastructure, landscaping, planting and biodiversity enhancements particularly along the river edge; **(Bullet Point 9)**
- Protection of bankside access for maintenance purposes. **(Bullet Point 10)**
- Development should ensure a high level of flood resilience and incorporate appropriate mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding). **(Bullet Point 11)**



Figure 1 - Inset taken from Policy CC4b Map

3.0 Representation

Our representation below focuses on the detailed site specific requirements of Policy CC4b, and any amendments or clarification that we consider would be beneficial for the soundness of the plan. We have also made comments on Policy 5 (Homes) and Policy 7.1 (Norwich urban area including the fringe parishes) of the Strategy Document.

Site Plans (Policy CC4b - Land Mountergate/Prince of Wales Road)

Overall, we welcome and support site allocation Policy CC4b in principle, subject to the following changes being made;

- In terms of Bullet Point 1 within the policy, please amended the wording as follows:

'Development to be approached comprehensively to achieve effective integration of the historic buildings in the ~~central~~ western part of the site into the overall development'

The reason for this change to the wording is due to the fact that the historic buildings are located on the western side of the site.

- With regard to Bullet Point 2, we support the land uses mentioned in the allocation, save for the following changes:

The inclusion of Class C2 residential care homes as an additional use and the removal of educational facilities as this reflects the nature of the uses that are more likely to come forward. The wording should therefore be amended as follows:

'Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), residential care homes home student accommodation, ~~educational facilities to support the adjacent Charles Darwin Primary Academy~~, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening and night-time economy. Night-time economy uses should not dominate the development and should be located to protect the amenity of adjoining residential and commercial occupiers'

- In respect of Bullet Point 5, we would like to clarify that Baltic House is not within the clients ownership, however any redevelopment scheme would not prejudice this building coming forward for development conversion or change of use.
- Bullet Point 8 relates to the retention and provision of public access to the currently private garden at the rear of Nelson Hotel. We request that this bullet point should be removed. The reason for this, is that as part of any redevelopment scheme, this open space will be re-provided, and therefore the word 'retention' does not work in this regard. Furthermore, any future open space would not be solely associated as a private garden to the Nelson Hotel. Finally, in respect of the provision of future open space, we consider that Bullet Point 7 covers this requirement.
- We request that an additional Bullet Point (12) should be added to Policy CC4b, to provide for the development of landmark buildings on the site:

Given the size and location of the site, it is considered that the site has potential to accommodate landmark buildings and to deliver a comprehensive high quality mixed use new community.

Strategy Document (Policy 5 – Homes)

Policy 5 relates to affordable housing, space standards, accessible and specialist housing, gypsies and travellers, travelling show people and residential caravans, purpose-built student accommodation and self/custom-build.

This representation only seeks to comment on the sections relating to affordable housing and purpose-built student accommodation (PBSA).

- In respect of the first bullet point for affordable housing, we seek the following amendment to ensure that viability considerations are captured within the Policy.

“at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing, and subject to viability testing in line with the NPPF”

- In terms of the PBSA section of the policy, and the last bullet point of this section, we seek the following amendment to take account of sites already allocated for PBSA as part of a mixed use allocation site and to ensure that double counting on affordable housing is avoided. We therefore suggest the following wording:

Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:

“.....make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing, unless the site has already been allocated for purpose built student accommodation or/and where part of the broader development scheme would deliver market housing and associated affordable housing as part of the development. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents”

Our comments above are made with regard to the delivery of viable development in Paragraph 57 of the NPPF.

Strategy Document (Policy 7.1 - Norwich urban area including the fringe parishes)

Policy 7.1 relates to Norwich urban area and the fringe parishes, and how they will be the areas major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal.

This representation only seeks to comment on the ‘City Centre’ section of the policy and specifically Point 3 (Leisure, culture and entertainment and the visitor economy) and Point 5 (The Natural and Built Environment).

- Point 3 states:

“Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre’s role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs.”

Given that the CC4b site allocation has an existing hotel that will be redeveloped as part of a future scheme, and sits in close proximity to a existing and future transport hub at Norwich Station and its surroundings, we welcome and support the above point:

- Point 5 states:

“New landmark buildings at the gateways to the city centre will be accepted where they are of exceptional quality and help to define or emphasise the significance of the gateway”

We support the encouragement for gateway developments within the city centre in appropriate locations. It is considered that Policy CC4b site allocation is an appropriate location for a landmark building due its strategic location within the City Centre and its proximity to Norwich Train Station. This approach is in line with the principle so the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important places.

4.0 Summary Conclusion

I trust my letter is clear and helpful, and that the Inspector will take full and proper account of our client’s request and clear objectives. In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact me or my colleague, Edward James.

We reserve the right to supplement or amend these comments in the future.

We would appreciate being kept closely informed of the progress of the GNLP.

Yours faithfully,



Nicola Forster
Director

Appendix 2 – Adopted Norwich City Council Late Nigh Activity’s Zones

