

<b>Settlement Name:</b>	<b>Norwich</b>
<b>Settlement Hierarchy:</b>	<p>The JCS positions the Norwich urban area at the top of the settlement hierarchy. As the most accessible and sustainable location in the area it benefits from a high level of accessibility to a broad range of local and sub-regional services and facilities and will retain that prime position and be promoted for a significant share of housing and economic development in the GNLP. The area within the city boundary is largely built up and no large-scale greenfield sites remain available to allocate. Consequently, the city's potential for the delivery of new housing and economic development will necessarily be reliant on the use of previously developed land and premises, increasing densities and exploiting the considerable potential for housing-led regeneration and renewal, particularly in the city centre.</p> <p>Norwich's landscape setting and natural environmental assets including the valleys of the river Wensum and Yare, key open spaces and green infrastructure corridors will limit the scale and location of development, as will the proximity of the Broads whose area includes the tidal River Wensum within the city boundary. The major heritage significance of the city centre and other key areas of the city means that particular care needs to be taken in planning, locating and designing new development.</p> <p>Approximately 7000 new homes can potentially be delivered from Norwich's existing commitment – that is housing that has been delivered between April 2018/March 2019 and which can be built on sites with unimplemented planning permissions and allocated in existing local plans at April 2019.</p> <p>Early work in the Towards a Strategy document indicates that Norwich could potentially accommodate 2500 homes in new allocations in addition to the 7000-dwelling commitment above.</p>

**PART 1 – ASSESSMENTS OF SITES INCLUDED IN THE DRAFT LOCAL PLAN REGULATION 18C CONSULTATION (JANUARY – MARCH 2020)**

**STAGE 1 – COMPLETE LIST OF SITES PROMOTED IN THE SETTLEMENT**

**LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION**

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
<b>Norwich</b>			
Land adjacent river Wensum and Premier Inn, Duke Street	GNLP0068	0.12	Residential-led mixed use development for an undetermined number of dwellings
The Alders, Cooper Lane <i>Full pp granted for one dwelling, 18 Nov 18 (18/01026/F)</i>	GNLP0184	0.71	Residential (unspecified number)
Henderson Community Park, Ivy Road	GNLP0248 A & B	5.65	Residential and/or light industrial development for an undetermined number of dwellings or employment units.
Constitution Motors Ltd, 141-143 Constitution Hill <i>Outline permission granted with all matters reserved for up to 12 dwellings 14 Feb 19 (18/00917/O)</i>	GNLP0282	0.27	Residential development of 10 to 15 new dwellings.
May Gurney and Deal Ground Site, Trowse (part falls within South Norfolk) <i>Outline planning permission granted with extended (10 year) timescale for approval of reserved matters, expires July 2023.</i>	GNLP0360	21.90	Residential led mixed use redevelopment to include employment, retail community uses, potential primary education provision and local greenspace and biodiversity areas.
Land east of King Street (King Street Stores & Wensum Sports Hall Site)	GNLP0377	0.33	Residential development for a minimum of 40 to 50 dwellings with re-provision of existing sports facility/centre.
Former Eastern Electricity Headquarters, Duke Street (Duke's Wharf)	GNLP0401	0.83	Residential-led mixed use development for approx. 400 dwellings (could include student

			accommodation) with retail and/or other appropriate city centre uses at ground floor level.
Barrack Street / Whitefriars <i>(Resolution to approve subject to s106 14 Mar 19: 18/01286/F - Demolition of existing buildings and structures; erection of 218 dwellings; conversion, refurbishment and extension of two Grade II Listed Cottages, erection of 310sqm of commercial floorspace (Class A1-A5 use) and 152sqm of Museum floorspace (D1 use), with associated works.)</i>	GNLP0409R	1.57	Residential-led mixed use development with some retail
Sentinel House, 37-45 Surrey Street. <i>Prior approval under PD 3 Apr 17 for conversion of offices to 199 apartments. (Now complete and occupied). Residue largely coincident with existing allocation</i>	GNLP0451	1.01	Town centre uses or mixed-use development of undetermined type.
Anglia Square Council resolution to approve 6 Dec 18; call-in by Secretary of State. <i>Part Full/Outline application for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for: up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas.</i>	GNLP0506	4.67	Mixed use redevelopment, to include approximately 20,000m <sup>2</sup> retail floorspace, 1,500 dwellings, 1,200 car parking spaces and community and leisure uses including a cinema. The site does not include Surrey Chapel or the former Barclays Bank site.
Dowding Road	GNLP0523	0.37	Residential development of up to 10 new dwellings
Site of Former Family Church, Heartsease Lane	GNLP0570	2.44	Residential (unspecified number)
St Georges Works, Muspole Street	GNLP2114	0.44	Residential-led mixed use development

Land at Riverside	GNLP2137	11.0	Mixed use development including residential, offices, increased leisure and recreational activities, hotels and retail
Sites at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane car park	GNLP2159	0.70	Residential development (150 dwellings proposed)
Friars Quay car park, Colegate ( <i>NB site is described in error in the submission as Colegate Car Park</i> )	GNLP2163	1.20	Residential development of 44 dwellings
West of Eastgate House, Thorpe Road	GNLP2164	0.19	Residential development of 20-25 dwellings
Homebase, Hall Road Retail Park	GNLP3050	2.28	Residential (unspecified number)
Land at Carrow Works	GNLP3053	20.00	Residential-led mixed use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. The site is expected to accommodate a minimum of 1200 homes.
St Mary's Works and St Mary's House	GNLP3054	1.05	Comprehensive mixed-use development to include residential and employment uses, with the possible addition of a hotel. The site is expected to accommodate a minimum of 150 homes
<b>Total area of land</b>		<b>81.13</b>	

## LIST OF SITES SUBMITTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
<b>Norwich</b>			
293 - 297 Aylsham Road	GNLP0117	1.20	Retail development including supermarket / food store
UEA Campus Sites (Norwich City), Earlham Road (see also GNLP2120 and GNLP2123)	GNLP0133 A- F	13.63	<p>A). University Drive North - Additional Sport Park related development e.g. new sports pitches, car parking and ancillary uses.</p> <p>B). University Drive West - Existing undeveloped part of Earlham Hall allocation to be carried forward.</p> <p>C). Cow Drive North - Existing undeveloped part of Blackdale allocation to be carried forward.</p> <p>D). South of Suffolk Walk - Existing undeveloped allocation to be carried forward.</p> <p>E). Land at the Grounds Depot Site – University Related development e.g. teaching, research, accommodation, general infrastructure and ancillary uses.</p> <p>F). Bluebell Road – University Related development e.g. teaching, research, accommodation, general infrastructure and ancillary uses.</p>

Norwich Airport Park & Ride, Buck Courtney Crescent	GNL0381	3.40	Small scale retail development / food store, hotel, offices or a mixed-use development.
10 Barnard Road	GNL0453	1.39	Approx. 2,400m <sup>2</sup> of floor space for convenience retail and approx. 1,400m <sup>2</sup> of floor space for restaurants and cafes.
Land to east of Spitfire Road and south of Anson Road	GNL0500	0.64	120 bedroom Hotel with associated car parking and landscaping.
Wensum Lodge, 169 King Street	GNL1011	0.26	Allocation to protect continued use as community sports facility.
Imperial Park (formerly Site 4), Norwich Airport (Partly within Broadland District – Horsham St Faith Parish)	GNL1061	46.5	General employment floorspace (B1c, B2, B8 and D1 with ancillary A1-A3 Use Classes).
Chapelfield	GNL2077	3.66	Additional town centre uses including retail (A1, Leisure (D2) and food & drink (A3)
Congregation Hall, UEA	GNL2120	0.33	Conference centre
Land adjoining Sainsbury Centre, UEA	GNL2123	1.60	University related development, possibly expansion of Sainsbury Centre
Site at Boulton Street	GNLPSL0011	0.05	Maintain existing use as community garden
		<b>72.66ha</b>	



GNLP3053	Amber	Green	Amber	Green	Amber	Amber	Green	Green	Amber	Amber	Amber	Amber	Amber	Green
GNLP3054	Green	Green	Green	Green	Green	Amber	Green	Green	Amber	Green	Amber	Green	Green	Green

## OTHER USES

	Categories														Use
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	Significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses	
Site Reference															
Norwich															
GNLP0117	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Commercial
GNLP0133 A	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Green	Green	University Related
GNLP0133 B	Green	Green	Green	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Green	Green	University Related
GNLP0133 C	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	University Related
GNLP0133 D	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green	University Related
GNLP0133 E	Green	Green	Green	Green	Green	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	University Related
GNLP0133 F	Green	Green	Green	Green	Green	Amber	Amber	Amber	Red	Amber	Amber	Amber	Green	Red	University Related
GNLP0381	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	
GNLP0453	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Commercial
GNLP0500	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Green	Amber	Green	Commercial



GMLP1011	This submission proposes the retention of an existing community sports facility. The proposal would not involve any substantive development or change of use and is thus not a use which it is appropriate to allocate or assess through the HELAA. It is a counter submission to GMLP0377 which proposes residential development of the sports hall alongside the adjoining King Street Stores.														Retention of community sports hall
GMLP1061	Amber	Green	Amber	Amber	Amber	Green	Amber	Green	Green	Amber	Amber	Green	Amber	Amber	Employment
GMLP2077	Amber	Green	Green	Green	Amber	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Green	Commercial
GMLP2120	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Amber	Amber	Green	Green	Green	Conference Centre
GMLP2123	Green	Green	Green	Green	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Green	Green	University Related
GMLPSL0011	This submission proposes the retention of an existing local open space. The proposal would involve not involve any substantive development or change of use and not a use which it is appropriate to assess through the HELAA.														Retention of community garden

**STAGE 3 – SUMMARY OF CONSULTATION COMMENTS FROM THE  
REGULATION 18 STAGE A & B CONSULTATIONS**

Site Reference	Comments
<b>Norwich</b>	
<p>GNLP0068 Land adjacent River Wensum and Premier Inn, Duke Street</p>	<p><b>General comments:</b> Objections raised concerns regarding destruction of one of the few remaining accessible green areas in the city*<sup>1</sup>. Brownfield sites should be considered first and suggestion this site is on a flood plain.</p> <p>Comments submitted in support of site. Constraints been examined in detail and can be overcome. Committee members overturned officer recommendation to approve 152 student bed spaces. Current examination to the way forward, likely to involve appeal and re-submission.</p> <p><b>Norfolk Wildlife Trust comments:</b> Development should not reach up to the riverside but allow for creation of narrow area of natural bankside semi-natural vegetation to link with similar between adjacent river and Playhouse. This will help deliver the River Wensum Environment Strategy.</p> <p><b>Broads Authority comments:</b> Site could support high density development. The site is up to the border of the Broads. There may be access issues and if site is a continuation link of Riverside Walk and any development here would need to be considered in their proposals. Could have significant visual impact and issues around continued canalisation of the river.</p>
<p>GNLP0184 The Alders, Cooper Lane</p>	<p><b>General comments:</b> 22 objections received to the potential allocation of this site on the grounds of (1) Unsuitability of the present narrow access for vehicles (2) Location adjacent to/within flood plain with consequent increased risk of flooding (3) Impact on the tranquil riverside character of the area and the setting of the existing period property on Cooper Lane and adjacent housing in Theobald Road (4) loss of landscape and green space protected in the local pan as a Strategic Green Infrastructure Corridor which is already heavily used. Considered that this corridor should be protected and enhanced to meet the needs of a growing population rather than reduced in size. The Yare Valley should be</p>

<sup>1</sup> Comment as submitted – the Duke Street site is not in fact a greenfield site and the proposal may have been misinterpreted as relating to the nearby St Georges Green open space off St Georges Street which has a similar relationship to the river.

	<p>seen as more than the sum of its parts. (5) Unacceptable impact on wildlife and biodiversity and loss of valuable opportunities for relaxation, informal recreation and play (6) Likely increase in pollution arising from development (7) Development of this site is not necessary to meet housing growth needs with so many alternative sites put forward outside of river valley areas.</p>
<p>GNLP0248 A &amp; B Henderson Community Park, Ivy Road</p>	<p><b>General comments:</b> Comments regarding site GNLP0248. Access for non-motorised road uses an important consideration. New layout at Dereham Road ring road roundabout including new pelican crossings is noted. Suitable mixed-use cycle/footpath to be provided by developer.</p>
<p>GNLP0282 Land at Constitution Motors, 140-142 Constitution Hill</p>	<p><b>General comments:</b> Comments in support of site GNLP0282. Support for the reallocation of this site as residential rather than car sales. The building line of neighbouring properties should be respected so as not to impact upon the character of the open space on the other side of the road.</p>
<p>GNLP0360 Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk</p>	<p><b>General comments:</b> Principle of developing this brownfield site is considered appropriate, but due to site constraints, development should not be overly intense. A biodiversity buffer should be provided along the river banks and any development should not hinder this site's ability to serve as a functional flood plain, as well as to replenish water supplies. This site's function from this point of view should be explicitly required within the policy text.</p> <p>Overall scepticism expressed over the principle of the Deal Ground development as a whole, albeit that the development of the May Gurney (Kier) site in isolation is considered acceptable. It is noted that the area proposed for potential development now includes the Water Works (Trowse Pumping Station) whose sympathetic restoration should be prioritised to avoid further deterioration and not left to last.</p> <p>Several objections on the grounds that there was significant and unacceptable flood risk as well as unavoidable impact and intrusion of development into a County Wildlife Site which should be protected for its wildlife, biodiversity and recreational value. Noted that the Strategic Flood Risk Assessment has redefined flood zone boundaries recently and more of the site is now vulnerable to flooding than previously. The HELAA identifies impacts on landscape, townscape, biodiversity, the historic environment, green infrastructure, the environment and neighbouring uses.</p>

	<p>Development of Deal Ground supported - would meet the requirement for residential development, expansion of the city and new educational facilities.</p> <p><b>Norfolk Wildlife Trust comments:</b>  Previous permissions allow for the protection and enhancement of Carrow Abbey Marsh County Wildlife Site. There is great potential for the restoration of this CWS as a new nature reserve associated with the development and a key area of green infrastructure linking the city with Whitlingham [Country] Park. This aim should be retained in any renewal of the allocation and new permissions.</p> <p><b>Broads Authority Comments:</b>  The development would be right up to the edge of the Broads and on a large scale. The Broads Authority would welcome early discussions. Redevelopment of the site gives opportunities for pedestrian/cycle bridge over the River Yare. Creation of new connections to Whitlingham and the Broads National Park from the centre of Norwich would highlight the aspirations of the River Wensum Strategy and Broads Local Access Forum. Likely to have significant visual impact.</p>
<p>GNLP0377  Land east of King Street (King Street Stores &amp; Wensum Sports Hall Site)</p>	<p><b>General comments:</b>  The site is well used and is subject to a 20-year lease to the existing Wensum Sports Centre as well as benefiting from Sport England-funded repairs. Accordingly, it should be retained and developed as a community sports facility and designated as a strategic site for leisure use, to avoid over intensification of residential use in the area and allow room for expansion. Consideration of the site through the adopted 2014 local plan concluded that there were no grounds for its release for housing and no evidence has been put forward by the proposer as to how the facility might be re-provided.</p>
<p>GNLP0381  Norwich Airport Park &amp; Ride, Buck Courtney Crescent</p>	<p><b>General comments:</b>  Proposal supported - it would provide jobs in the service sector and potentially improve the look of the surrounding environment.</p> <p>Objections made by Hellesdon Parish Council and a number of individual objectors in conjunction with other site proposals in Hellesdon parish itself. Objections are raised on the grounds of: (1) Likely increase in traffic congestion and pollution (2) Impact on amenities, services and facilities in particular the GP practice (3) Impact on traffic safety.</p>
<p>GNLP0401  Former Eastern Electricity Headquarters, (Duke's</p>	<p><b>General comments:</b>  Comments in support of site GNLP0401. Site should be taken forward as an allocation for residential-led redevelopment. It is suitable for residential development, is available for development within the plan period and there are no constraints that would threaten delivery. It is highly unlikely the site will come forward for</p>

<p>Wharf), Duke Street</p>	<p>office-led development and given the significant oversupply of employment land the loss of the site for offices would have no adverse impact on the supply of land for office development within Norwich.</p> <p>Comments in support of site GNLP0401. Support for site to come forward for residential led mixed use development. The site has been unoccupied and derelict for many years and has become an eye sore on a busy road.</p> <p><b>Broads Authority Comments:</b> Comments made in relation to Site GNLP0401. This is right up to the border with the Broads and of a large scale and the Broads Authority would welcome early discussions. Would extend the built-up area in a way that could affect the Broads. Redevelopment of the site could give rise to new opportunities for access to the River Wensum both for craft and pedestrians but could have significant visual impact. Issues around continued canalisation of the river.</p>
<p>GNLP0409R Barrack Street / Whitefriars</p>	<p><b>General comments:</b> Comments submitted in support of site. The site is considered suitable for development as noted in then conclusions of the Housing and Economic Land Availability Assessment (HELAA) Addendum. The site is suitable, available and achievable for residential development.</p> <p><b>Broads Authority Comments:</b> Comments submitted regarding the site potentially providing opportunities for place making and improvements to the public realm, as well as reinforcing the character of the natural environment to public. Open space at the riverside rather than having buildings constructed close to the bank. Would also like to see a feature made of the heritage with open space in that area.</p>
<p>GNLP0451 Sentinel House, (St Catherine's Yard) Surrey Street.</p>	<p><b>General comments:</b> Comments on Site GNLP0451. Site suitable for low-rise residential or residential led mixed use.</p>
<p>GNLP0506 Anglia Square</p>	<p><b>General comments:</b> Objections to and comments on the proposal on the grounds of (1) Principle: It constitutes another example of an "ugly, failed scheme" of the kind which litter Norwich and have been imposed on the area for many years; it will only serve to generate profits for developers; an influx of wealthy urban professionals will gentrify and corporatize the Magdalen Street area and "devastate" the existing community and its artistic life and culture focused on small businesses and enterprises meeting the needs of a high proportion of poor and disadvantaged people who have no other</p>

	<p>choices; it will complete the destruction of an area which has been in long term retail decline but is undergoing a revival and is known for its vibrancy, diversity and human "urban village" scale (2)  Design: the 1200+ dwelling scheme is over intense and dominant in particular the excessive height of the 25- storey tower [as proposed in the original planning application] is strongly objected to; unacceptable visual impact on long views and the setting of Norwich Cathedral as viewed from the Grade II* listed Catton Park; the Norwich Green Party and others suggest a smaller scale mixed use development of the kind proposed in the Northern City Centre Area Action Plan would be more acceptable; a number of objectors argue for restoration and refurbishment of the existing buildings as a noted example of 1960s brutalist architecture; others say a scheme with more personality and imagination reflecting the local vernacular and character is required. (3)  Inappropriate mix of uses: not enough emphasis on community provision and schools resulting in an unacceptable impact on services and facilities, no justification for additional retail floorspace when there are so many empty shops. GL Hearn on behalf of Infrared Retail consider the proposed 20,000 sq.m of retail floor space is unjustified contrary to the Anglia Square Policy Guidance Note and out of scale with the Large District Centre which should perform a complementary role focused on convenience shopping serving the needs of the local area; fear that the impact of such a scale of retail development on the city centre will not be subject to proper scrutiny.</p> <p>Comments made in support of the proposal – beneficial development which is much needed for the local area and which would be so much better than what is there currently.</p>
<p>GNLPO523  Dowding Road</p>	<p><b>General comments:</b>  I have concerns that the development would result in more use of the private Taylors Lane which is already in a poor state of repair. If Taylors Lane was improved to Highways Standards I would not object.</p> <p>The site has been subjected to many attempts by the developer.</p>
<p>GNLPO570  Site of Family Church,  Heartsease Lane</p>	<p><b>General comments:</b>  Comment submitted regarding Site GNLPO570. Concern at the proposal for development on the Gothic Club (former Family Church) site in view of site forming part of the heath and the football pitch having become overgrown. Vigilance is needed to ensure a satisfactory outcome.</p> <p>Objections raised regarding archaeology. Site is part of the Mousehold Heath glaciofluvial outwash plain and is close to the find of a Neanderthal hand-axe. If development were granted, then plans should be made conditional upon a watching brief for possible Palaeolithic archaeological interest.</p>

	Comment submitted in support of Site GNLP0570. Great site, would be good to see lots of homes here. Close to amenities.
GNLP2114 St Georges Works, Muspole Street	No comments submitted
GNLP2137 Land at Riverside	<b>General comments:</b> Comments submitted in support of site, especially for new housing with low levels of car parking.  <b>Broads Authority comments:</b> Comments raised regarding potential opportunities to improve the relationship between the development, public and natural environment. Opportunity to enhance heritage and the relationship with the River.
GNLP2159 Sites at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane car park	<b>General comments:</b> Some errors identified in the HELAA.
GNLP2163 Friars Quay car park, Colegate	No comments submitted
GNLP2164 West of Eastgate House, Thorpe Road	No comments submitted
GNLP3050 Homebase, Hall Road Retail Park	<b>No comments as site submitted during Stage B consultation</b>
GNLP0117 293 - 297 Aylsham Road	<b>General comments:</b> One comment submitted in support of site. They suggest it is an appropriate location for retail use, though consideration should be given to sustainable modes of transport and effect this will have on traffic.

<p>GNLP0133 A- F Development sites at UEA, various</p>	<p><b>General comments:</b> A number of objections raised regarding potential development in the Yare Valley. The Yare Valley must be protected, there has already been too much development in the vicinity. The UEA should look for alternative sites, preferably brownfield. Further development in the Yare Valley would change the character of the area and encourage urban sprawl and additional traffic and noise. Communities are already suffering due to increased student numbers and local infrastructure cannot cope. Green spaces are important to quality of life and physical and mental wellbeing. The Yare Valley is a popular green space designated as a strategic green infrastructure corridor. It is well used for recreational purposes and provides a green link to Eaton park. It is an important green lung for the city and rather than reducing its size every effort should be made to improve and protect it from encroaching development. The Valley is of great environmental and ecological importance with an abundance of wildlife. The land is boggy and regularly floods. Sites E &amp; F in particular [Strawberry Field and land west of Bluebell Road] should be protected with concern expressed at the potential loss of the Donkey Sanctuary.</p> <p>Objection to Site 0133D, [Land south of Suffolk Walk] which includes a chalk pit of geological interest listed in the Norfolk Geodiversity Audit. It provides degraded exposures of the pre-Weybourne Chalk sub-division, subject to ongoing research by Portsmouth University. If development were granted request that plans be made conditional upon the provision of chalk exposures as part of Green Infrastructure provision, thus enhancing the sites geological and wildlife interest. Unconditional objection to 0133E and 0133F [Strawberry Field and land west of Bluebell Road] on grounds of negative impact on landscape character of the Yare Valley.</p> <p>Sport England would support the principle of providing additional sports pitches at UEA, subject to the provision of adequate ancillary facilities and pitches meeting technical requirements.</p> <p>Comments submitted by the promoter in support of sites GNLP0133 A-F which endeavour to address issues raised in the HELAA for each site. Sites considered to be suitable, available, achievable and viable and are therefore deliverable. Sites B,C and D aim to retain undeveloped portions of existing allocations, Site A endeavours to allocate land for expansion of the Sports Park. Sites E and F are submitted as strategic reserve sites.</p> <p>Development of site D [Land south of Suffolk Walk] would be appropriate, but the policy should be written to restrict development to that which will not unduly impact upon the character of the river valley and the setting of the listed UEA campus. Building scales towards the lake should be smaller in</p>
--	---



	<p>scale and landscaped appropriately to reduce impact on the lakes ecosystem and provide biodiversity.</p> <p>Improved sporting facilities may have an important economic benefit to the wider community and will improve and enhance provision of health and fitness related activities in a climate where health is a key priority. The potential link between clubs and the UEA will give the opportunity to promote the University and wider city as a centre of excellence. Parking problems on Colney Lane may also be alleviated when sporting events take place.</p> <p><b>Cringleford Parish Council comments:</b> 0133-D, E and F. This large site lies in Norwich but is abuts the Yare Valley and its development is, therefore the concern of neighbouring parishes. Development would further hem in the valley with buildings and completely change its semi-wild character. Plot 0133 encroaches on the valley itself, while its south-western corner touches on a drainage channel, suggesting that the area is liable to flood.</p>
<p>GNLP0453 10 Barnard Road</p>	<p><b>General Comments:</b> Comments by the site promoter in support of site GNLP0453. Expressions of interest secured from a retail operator and a number of food operators. This type of development would create jobs and expand the range of retail and eating out opportunities for local residents and workers at the Bowthorpe Industrial Area, reducing the need to travel. The designation of the site within the Bowthorpe Employment Area is a hangover from previous plans and has acted as a barrier to sustainable redevelopment schemes coming forward.</p>
<p>GNLP0500 Land to east of Spitfire Road and south of Anson Road</p>	<p><b>General Comments:</b> Proposal supported - would provide jobs in the service sector; could improve the appearance and footfall in the area.</p> <p><b>Hellesdon Parish Council comments:</b> Objections made by Hellesdon Parish Council and a number of individual objectors in conjunction with other site proposals in Hellesdon parish itself. Objections are raised on the grounds of: (1) Likely increase in traffic congestion and pollution in Fifers Lane and on the surrounding network (2) Impact on amenities, services and facilities in particular the GP practice.</p>
<p>GNLP1011 Wensum Sports Hall, King Street</p>	<p><b>General Comments:</b> The site is well used and is subject to a 20-year lease to the existing Wensum Sports Centre as well as benefiting from Sport England-funded repairs. Accordingly, it should be retained and developed as a community sports facility and designated as a strategic site for leisure use, to avoid over intensification of residential use in the area and allow room for expansion. Protection and specific designation for sports use is explicitly</p>

	<p>supported by Sport England, the Norwich Green Party and a number of private individuals.</p> <p><b>Broads Authority comments:</b> Protect as sports centre in community use – support.</p>
<p>GNLP1061 Imperial Park (formerly Site 4), Norwich Airport</p>	<p><b>General Comments:</b> Objections made by Hellesdon Parish Council and a number of individual objectors in conjunction with other site proposals in Hellesdon parish itself. Objections are raised on the grounds of: (1) Likely increase in traffic congestion and pollution (2) Impact on amenities, services and facilities in particular the GP practice (3) Impact on traffic safety. General concern was raised in addition by one objector about development on greenfield sites in the countryside [although this site is neither]. The Norwich Green Party and an individual objector consider that the site's proximity to Norwich Airport and poor transport links make it unsuitable for anything other than employment land: any site-specific policy should demonstrate how the units in the development can be made accessible by sustainable transport.</p> <p>Representation in support of the proposal by the site promoter Barton Wilmore on behalf of Norwich International Airport. Site 4 (the former Aviation Park site) is promoted for potential allocation for a more flexible range of B class employment uses to more readily attract commercial businesses to, and support the growth of, the Airport. Justification is provided by reference to a limited supply of readily available employment sites in the vicinity and the unsuitability of existing stock and other potential sites and allocations.</p> <p><b>Hellesdon Parish Council comments:</b> Development will put pressure on the facilities and amenities of Hellesdon and add to the already severe traffic congestion in the area.</p>
<p>GNLP2077 Chapelfield</p>	<p>No comments submitted</p>
<p>GNLP2120 Congregation Hall, UEA</p>	<p><b>General Comments:</b> Comments submitted in support of site. Issues raised by the HELAA assessment can be addressed through the considered design of the site at a detailed planning application stage.</p>
<p>GNLP2123 Adjoining Sainsbury Centre, UEA</p>	<p><b>General Comments:</b> Comments submitted in support of site. Issues raised by the HELAA assessment can be addressed through detailed design of a scheme on this site, as part of any planning application process.</p> <p>Objections raised regarding potential development in the Yare Valley. The Yare Valley is a popular green space that is well used</p>

	throughout the year and should be protected for wildlife and recreation. Rather than reducing its size every effort should be made to improve and protect it from encroaching development.
GNLPSL0011 Land off Boulton Street	Support suggestion to retain existing use as a community garden. (this comment submitted in error against GNLP1011)

## **STAGE 4 – DISCUSSION OF SUBMITTED SITES**

In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not currently considered to be realistic options, or do not have sufficient supporting evidence and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.

A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; consultation comments and school capacity and accessibility information, where provided. The emerging spatial strategy and current commitments will also be considered.

Conclusions regarding a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence.

A total of 30 submissions put sites forward in Norwich for prospective allocation in the GNLP. These included 37 individual sites. Two of these submissions contained multiple site proposals and each site detailed in the submission has consequently been assessed individually:

- Six sites at the University of East Anglia (**GNLP0133-A to GNLP0133-F**) proposed for a range of University-related uses; and
- Two sites at Henderson Community Park, Ivy Road, (**GNLP0248-A and GNLP0248-B**) proposed for residential and employment uses.

21 sites are promoted for residential development (or mixed use with an element of residential) totalling just over 60 hectares; 16 sites are proposed for a range of other non-residential uses totalling 69 hectares. The majority of the sites are relatively small scale, the exceptions being the suite of sites at the UEA (13.63 hectares), the Deal Ground, Bracondale (21.90 ha) and Imperial Park at Norwich Airport (43 hectares).

### **Sites considered as reasonable alternatives are:**

#### **GNLP0068**

Land adjacent river Wensum and Premier Inn, Duke Street. Residential-led mixed use development for an undetermined number of dwellings. This is a prominent brownfield site in the northern city centre which is long term vacant (aside from an

established public car park use) and offers the potential for beneficial regeneration and redevelopment including improved access to the river. The principle of residential development is established by virtue of an extant part-implemented permission which also included the adjacent hotel as built. Despite its small size the site is considered appropriate for housing subject to overcoming flood risk constraints and achieving an acceptable design for its sensitive riverside context.

#### GNLPO133B

UEA - University Drive West. Existing undeveloped part of Earlham Hall allocation R39 to be carried forward. The principle of development has been established by virtue of the existing local plan allocation (R39). This is a brownfield site forming the consented second phase of the Enterprise Centre development at Earlham Hall. The proposal reflects a form of development already agreed in principle and committed. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).

#### GNLPO133C

UEA - Cow Drive North. Existing undeveloped part of Blackdale allocation R40 to be carried forward. The principle of development has been established by virtue of the existing local plan allocation (R40) and consented and partly completed scheme for student accommodation. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). As an extant consent and previous allocation; this site is been counted in the commitment figures.

#### GNLPO133D

UEA - Land between Suffolk Walk and Bluebell Road. Existing undeveloped allocation R41 to be carried forward. The principle of development has been established by virtue of the existing local plan allocation (R41) as a strategic reserve for university expansion. Its allocation for development remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).

#### GNLPO133E

UEA - Land at the Grounds Depot Site, Bluebell Road. The site has been developed and in operational use for several years as a ground's maintenance depot. Although in a prominent and sensitive river valley location with respect to the campus and the UEA Broad, on balance it is considered that the site offers the best opportunity to accommodate limited development to support the expansion of the UEA and will enable further enhancement and greater public access to the river valley, with the proviso that any development must be sensitively designed and integrated into the landscape.

#### GNLPO282

Land at Constitution Motors, 140-142 Constitution Hill. This former car sales site on a main road location in north Norwich is now subject to outline planning permission for up to 12 homes. The site is located in a predominantly residential area and is appropriate for residential use.

#### GNLP0360

May Gurney and Deal Ground Site, Trowse (part of this site falls within South Norfolk jurisdiction). This strategic regeneration opportunity site in east Norwich and including land at Trowse has benefit of outline planning permission for up to 680 homes, commercial uses, recreational open space and transport infrastructure, valid until 2023. It is a long-term strategic development priority for Greater Norwich and would secure major economic and regeneration benefits but is subject to complex constraints identified through the HELAA. Development potential of this land alongside the neighbouring Utilities site and land potentially available through the release of the former Carrow Works site could be recognised through a wider strategic growth allocation across the three sites, to be unlocked and delivered comprehensively through an AAP and/or masterplan. This site could be considered for residential led mixed-use redevelopment including employment, retail & community uses, potential primary education provision and local greenspace and biodiversity areas.

#### GNLP0377

Land East of King Street. The proposal involves redevelopment and loss of a community sports facility without evidence that premises are surplus to requirements or other justification, potentially contrary to emerging policy; the principle of development on the King Street Stores part of the site has however been established by virtue of an existing local plan allocation and would be appropriate to carry forward). It would however, be reasonable to progress development on the Sports Hall site if appropriate alternative provision and a mechanism for delivering it could be identified.

#### GNLP0381

Airport Park and Ride Site, Buck Courtney Crescent. There is no current evidence of need for the uses proposed and no immediate justification for the release of the site for alternative development pending decisions on the potential future replacement and redistribution of Park and Ride facilities in the context of the ongoing Transport for Norwich review. Once these decisions have been finalised, the site would be appropriate for release for alternative uses.

#### GNLP0401

Former Eastern Electricity Headquarters, Duke Street (Duke's Wharf). This is a key city centre regeneration opportunity site allocated for office-led development in the adopted local plan (CC21). The site is long term vacant aside from a temporary car park use. Despite a succession of consented schemes including most recently for office to residential conversion and new build potentially delivering 156 dwellings, the site remains stalled. As a key regeneration priority a concerted effort is required to bring the site forward and maximise its development potential, accordingly identification in the GNLP is highly desirable.

#### GNLP0409R

Barrack Street / Whitefriars. Residential-led mixed use development with some retail. This is a key city centre regeneration opportunity site currently allocated for office development (CC17b). As of March 2019, there is resolution to approve a detailed

scheme of 218 dwellings, commercial floorspace and a replacement museum. It adjoins vacant land on Barrack Street north of Gilders Way which has outline consent for mixed use development including 200 homes and is also allocated for a comparable mix of uses in the local plan (CC17a). The latter site will be considered separately as part of the assessment of the reallocation potential of existing commitments. GNLP409R is suitable to shortlist, allocation would be appropriate in conjunction with the adjoining site if progressed.

#### GNLP0451

Sentinel House, 37-45 Surrey Street. Town centre uses or mixed-use development of undetermined type. This city centre site comprises a 1980s built former office building and vacant land to the east. Sentinel House was subject to two prior approval applications for office to residential conversion under permitted development, both approved subsequent to the GNLP submission. The most recent consent for 199 apartments has been implemented and occupied. The adjoining land forms part of site CC29 allocated for housing in the local plan. This part of the site is subject to a consent for a 252-bed student accommodation development (approved `by appeal). The allocated land east of Sentinel House offers significant regeneration potential. Suitable to shortlist excluding the implemented part of the site (Sentinel House itself).

#### GNLP0506

Land at and adjoining Anglia Square is a strategically important long-term regeneration priority in the northern city centre (previously allocated in the Northern City Centre Area Action Plan) which has great potential as a catalyst for area wide regeneration and the delivery of a significant quantum of housing contributing to Norwich's allocation requirement, alongside major economic benefits for the city and Greater Norwich as a whole. Following resolution to approve a mixed-use regeneration scheme including 1250 homes and commercial floorspace (December 2018), the application has been called-in by the Secretary of State and will now be considered at a Public Inquiry. Notwithstanding the uncertainty over the current proposals, the strategic importance and major regeneration benefits of the site require appropriate recognition in the GNLP.

#### GNLP0570

(Site of Family Church, Heartsease Lane) This site is being promoted for community-based development including a place of worship. The option of housing may be considered if the scheme for community use does not materialise.

#### GNLP2114

St Georges Works, Muspole Street. This former factory site was previously allocated in the Northern City Centre Area Action Plan for housing development and was subject to a now expired planning permission for redevelopment and conversion providing 57 homes. Prior approval applications have been granted on office premises within the site (The Guildyard, Colegate and Seymour House, Muspole Street) potentially delivering 60 flats. Outline regeneration proposals have been publicised alongside the nearby St Mary's Works site, for which there is a consented outline scheme, under the "Shoe Quarter" initiative. The building is currently used

beneficially as managed workspace but in the event of more substantive development proposals the site is capable of delivering a more substantial housing led development with significant regeneration benefits. Suitable to shortlist.

#### GNLP2137

Riverside. Riverside comprises a defined retail area identified in the JCS and GNLP retail hierarchy and adopted local plan. The submission seeks relaxation of current policy and general recognition of wider potential for new uses and/or complementary development in an established retail destination but does not propose specific uses or a quantum of housing. Emerging policies for the city centre in the GNLP would in any case support such diversification of use without the need for a specific allocation. There is however significant longer-term potential at Riverside which it may be appropriate to recognise in detailed policy at a later stage.

#### GNLP2159

Sites at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane car park. This is a complex of city centre vehicle sales sites in a single ownership together with the small surface car park to the rear off Mariners Lane. 147-153 Ber Street is already allocated in the adopted local plan for housing development (CC2). The entire site was previously identified in the 2004 local plan and subject to planning permission for a total of 151 residential units granted in March 2011 but not implemented. The principle of residential development is established by virtue of previous consents, but detail may need further consideration in view of the changes in local and national planning policy in the interim. The site is considered to offer considerable regeneration benefits and could deliver a significant quantum of housing including affordable housing.

#### GNLP2163

Friars Quay car park, Colegate. This is a former city centre warehouse building in use as a private car park serving the adjoining Friars Quay and Merchants Court. It was previously allocated in the Northern City Centre Area Action Plan for housing-led development and subject to a withdrawn planning application for residential development broadly similar to the current GNLP submission. The principle of residential development has been established by virtue of the previous NCCAAP allocation and the development of the site (subject to detailed design) would offer regeneration benefits as well as contributing to the affordable and general needs housing requirement for the city.

#### GNLP2164

West of Eastgate House, Thorpe Road. This is a private car parking area previously serving commercial office buildings on a main road location east of the city centre. Eastgate House (former offices) adjoining has recently been converted to residential apartments mainly under prior approval as permitted development, Graphic House (also offices) immediately to the west has permission for conversion to a student HMO. The site between these two buildings is of restricted size but could support appropriate residential development in association with the established newly converted residential accommodation adjoining.



### GNLP3050

Homebase, Hall Road Retail Park. A freestanding residential development with no effective integration, connectivity or functional relationship with the established retail park and district centre immediately adjoining would be difficult to justify and adequate independent access and proper segregation from adjacent commercial uses might be problematic to achieve, however with a more comprehensive approach to redeveloping the whole retail park site, some residential use could be achievable. It should be noted that the most recent proposals (postdating this submission) involve retaining the retail use while downsizing the DIY store and subdividing the remainder.

### GNLP3053

Carrow Works was formerly the location for Britvic Soft Drinks Ltd. and Unilever UK Ltd. Part of the proposed brownfield site also includes Carrow House which is currently owned by Norfolk County Council. This site, when grouped with other east Norwich sites, has potential in the long-term to be a strategically important contribution to a new urban quarter for Norwich, to act as a catalyst for additional regeneration in neighbouring urban areas and to contribute significantly to growth of the Greater Norwich economy. Development potential of this land alongside the neighbouring Utilities site and May Gurney/deal ground site could be recognised through a wider strategic growth allocation across the three sites, to be unlocked and delivered comprehensively through an Area Action Plan and/or masterplan. This site could be considered for residential led mixed-use redevelopment including employment, retail & community uses, education provision and local greenspace and biodiversity areas.

### GNLP3054

St Mary's Works and St Mary's House, Duke Street.

This former factory site was previously allocated in the Northern City Centre Area Action Plan for mixed use development and benefits from extant outline planning permission for redevelopment and conversion providing 151 homes, office space and a hotel. Outline regeneration proposals have been publicised alongside the nearby St George's Works site under the "Shoe Quarter" initiative. The main constraint is the locally listed former shoe factory building on Oak Street. There are also important mediaeval churches adjacent to the site (St Martin at Oak and St Mary Coslany Church), which need to be respected in any redevelopment. Suitable to shortlist

### **Sites not considered as reasonable alternatives are:**

#### GNLP0117

293-297 Aylsham Road. A foodstore development has since been permitted and is open for trading.

#### GNLP0133 A, GNLP0133 F and GNLP2123

UEA development opportunity sites, respectively land at University Drive north of Sportspark, land west of Bluebell Road and land adjoining the Sainsbury Centre. These are regarded as unreasonable; all would involve loss of protected open space

and have impacts on landscape character and the setting of heritage assets with no clear compensatory economic benefit; potentially contrary to existing and emerging policy.

#### GNLP0184

The Alders, Coper Lane. The site is too small to identify individually in the plan; landscape character and flood risk imposes a constraint; a single dwelling has subsequently been granted planning permission.

#### GNLP0248 A and GNLP0248 B

Two sites at Henderson Community Park, Ivy Road Both proposals are considered unreasonable, involving development on and loss of open space without evidence that the sites are surplus to requirements or any other justification, the proposals are potentially contrary to emerging policy seeking to protect green infrastructure and open space.

#### GNLP0453

10 Barnard Road. This is a prospective freestanding development for retail and town centre uses unrelated to any established or proposed centre in the retail hierarchy, potentially contrary to adopted and emerging policy. Additionally, there is no justification presented for the loss of the established indoor sport use on the site.

#### GNLP0500

Spitfire Road. A hotel development has since been permitted and is being built.

#### GNLP0523

Dowding Road. The site is too small to identify individually in the plan; development involves loss of protected open space without justification; potentially contrary to emerging policy seeking to protect green infrastructure and open space.

#### GNLP1011

A counter submission proposing retention and explicit protection of the sports centre, is not a proposal involving any substantive development or change of use and consequently is not a matter for an allocation policy; proposals are more appropriately considered in the context of adopted development management policies which already protect such facilities and require justification for their loss.

#### GNLP1061

Imperial Park, Norwich Airport. The GVA Employment, Retail and Town Centres Study shows no evidence of need for additional general-purpose strategic scale employment allocations given the surplus of existing unimplemented allocated sites, of which there are a number in the vicinity. The opportunity to deliver a major aviation related facility as consented would bring very significant economic benefits to the Greater Norwich area which may not be deliverable through other forms of development and whilst not viable at present its longer-term feasibility has yet to be tested.

#### GNLP2077

Chapelfield shopping centre. The submission seeks relaxation of current policy and general recognition of wider potential for new uses in an established retail

destination but does not propose any substantive new development or change of use. It is considered more appropriate to assess future proposals in the context of the GNLP's emerging flexible policy approach to the city centre and town centre uses, alongside a review of criteria-based DM policy and guidance applicable to Chapelfield.

GNLP2120

(Congregation Hall) would involve redevelopment of buildings within the established UEA campus area which could be adequately assessed in the context of adopted local plan policies and would not require a specific allocation.

**STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT**

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives

**LIST OF SITES SHORT LISTED FOR RESIDENTIAL/MIXED USE ALLOCATION**

Address	Site Reference	Area (ha)	Proposal
<b>Norwich</b>			
Land adjacent to the river Wensum and the Premier Inn, Duke Street	GNLP0068	0.12	Residential-led mixed use development for an undetermined number of dwellings
Land at Constitution Motors, 140-142 Constitution Hill.	GNLP0282	0.27	Redevelopment for housing
Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk.	GNLP0360	21.90	Residential led mixed-use redevelopment to include employment, retail community uses, potential primary education provision and local greenspace and biodiversity areas.
Land east of King Street (King Street Stores & Sports Hall Site)	GNLP0377	0.33	Residential development for minimum of 40 - 50 dwellings with re-provision of existing sports facility/centre.
Former Eastern Electricity Headquarters, Duke Street (Duke's Wharf)	GNLP0401	0.83	Residential-led mixed use development for approx. 400 dwellings (could include student accommodation) with retail and/or other appropriate city centre uses at ground floor level.
Barrack Street / Whitefriars	GNLP0409R	1.57	Residential-led mixed use development with some retail
Land adjoining Sentinel House (St Catherine's Yard), Surrey Street	GNLP0451	1.01	Town centre uses or mixed-use development of undetermined type.
Anglia Square	GNLP0506	4.67	Mixed use redevelopment, to include approximately 20,000m <sup>2</sup> retail floorspace, 1,500 dwellings, 1,200 car parking spaces and community and leisure uses including a cinema. The site

			does not include Surrey Chapel or the former Barclays Bank site.
Site of Former Church, Heartsease Lane	GNLP0570	2.44	Residential as an alternative to church redevelopment
Land at and adjoining St Georges Works, Muspole Street	GNLP2114	0.44	Residential-led mixed use development
Land at Riverside	GNLP2137	11.6	Mixed use development including residential, offices, increased leisure and recreational activities, hotels and retail
Sites at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane car park	GNLP2159	0.70	Residential development (150 dwellings proposed)
Friars Quay car park, Colegate. (former Wilson's Glassworks site)	GNLP2163	0.13	Residential development of 44 dwellings
West of Eastgate House, Thorpe Road	GNLP2164	0.19	Residential development of 20-25 dwellings
Sainsbury Homebase Site, Hall Road Retail Park	GNLP3050	2.27	Housing
Land at Carrow Works	GNLP3053	20.00	Residential-led mixed use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. The site is expected to accommodate a minimum of 1200 homes
St Mary's Works and St Mary's House	GNLP3054	1.05	Comprehensive mixed-use development to include residential and employment uses, with the possible addition of a hotel. The site is expected to accommodate a minimum of 150 homes
<b>Total area of land</b>		<b>69.52</b>	

## LIST OF SITES SHORT LISTED FOR OTHER USES

Address	Site Reference	Area (ha)	Proposal
<b>Norwich</b>			
UEA - Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery)	GNLP0133B	1.38	Existing undeveloped part of Earlham Hall allocation R39 to be carried forward
UEA – Land North of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House)	GNLP0133C	0.89	Existing undeveloped part of Blackdale allocation R40 to be carried forward
UEA – Land between Suffolk Walk and Bluebell Road	GNLP0133D	2.74	Existing undeveloped allocation R41 to be carried forward
UEA - Land at the Grounds Depot Site, Bluebell Road	GNLP0133E	1.60	University related development
Norwich Airport Park & Ride	GNLP0381	3.40	Redevelopment of site for small scale retail/food store, hotel, business/office use or mixed-use development.
<b>Total area of land</b>		<b>10.01</b>	

**STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVES SITES**

<b>Site Reference:</b>	GNLP0068
<b>Address:</b>	Land adjacent to the river Wensum and the Premier Inn, Duke Street
<b>Proposal:</b>	Residential-led mixed use development for an undetermined number of dwellings.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Unmade carpark	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Market Attractiveness, Flood Risk, Significant Landscapes, Historic Environment, Open Space and GI.
<b>HELAA Conclusion:</b> This is a small, highly accessible brownfield site close to all services in Norwich city centre. There are no known constraints from utilities infrastructure or contamination/ground stability. Off-site mains reinforcement would be required to serve growth in this location. Proximity to the river (within the Broads Authority area) may give rise to impacts which would need mitigation through design. Much of the site has some degree of flood risk. There would be potential townscape impacts on the surrounding conservation area and adjoining heritage assets. Improvements to site access would be required. Initial highways evidence has indicated that suitable access could be provided through development and that any impact on the local road network could be mitigated. There are a number of constraints affecting this site, but these may be possible to mitigate, with flood protection likely to be the most important consideration. Despite its small size the site could support a high-density development and is thus considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>4/1998/0656</b> - Redevelopment of site to provide 117-bedroom hotel, 21 residential units with office accommodation and car parking spaces and ground floor restaurant. (Approved 15.03.2004)

**4/2001/1009** - Use of vacant site as public car park. Temporary until 1 April 2003. (Approved 07.03.2002)

**4/2003/0507** - Renewal of temporary planning permission No. 4/2001/1009/F 'Use of vacant site as public car park, temporary until 1 July 2005' (Approved 27.06.2003)

**05/01100/F** – Temporary use of land as hotel car park. (Refused 11.05.2007)

**06/01245/U** - Use of land as private, long stay car park and access to/from car park. (Refused 11.05.2007)

**17/01078/F** - Redevelopment of car park site to provide student accommodation. (Refused 14.03.2018) (APP/G2625/W – Dismissed)

**18/01552/F** - Redevelopment of car park site to provide student accommodation (revised proposal).

Status: Application Approved

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

The principle of residential development is established on this prominent city centre site by virtue of an extant part-implemented permission which also included the adjacent hotel as built. It also benefits from a recent permission for a 139-bed student accommodation. Notwithstanding this, the land is long-term vacant aside from an established public car park use. Despite its small size the site is considered appropriate for housing subject to overcoming flood risk constraints and achieving an acceptable design for its sensitive riverside context.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.



<b>Site Reference:</b>	GNLP0133 B
<b>Address:</b>	UEA - University Drive West
<b>Proposal:</b>	Existing undeveloped part of Earlham Hall allocation R39 to be carried forward.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Undeveloped part of Earlham Hall and unused nursery garden	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Significant Landscapes, Townscapes, Historic Environment.
<b>HELAA Conclusion:</b> The site is one of a number of land parcels (A-G) within and adjoining the University campus. Site B immediately adjoins Earlham Hall and falls within the area currently allocated and consented for exemplar business development, the first phase of which has been completed. The site is accessible to all local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity, flood risk or contamination/ground stability. There are no nationally protected landscapes in the immediate vicinity although potential to affect the setting of Earlham Hall (grade 2* listed), the walls of the garden (separately listed grade 2), the adjoining registered historic parkland and the surrounding conservation area. Initial highway evidence has highlighted that potential access constraints could be overcome through development but that the local road network is unsuitable. The site is considered suitable for the land availability assessment. The site is subject to an existing planning permission or allocation for a similar form of development, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>12/01331/F:</b> Refurbishment and alteration of potting shed (B), coach house and stables (C) and garage (E1) for use as academic space (Use Class D1). Demolition of garage (D) and outbuildings (E5, E6, E7). Removal of CCTV camera poles; new CCTV cameras on building B west elevation and C north elevation. Relocation of refuse area. Minor changes to external works layout, materials and location of landscape furniture. (Approved 29/11/2012)

**12/01347/L:** Refurbishment and alteration of potting shed (B), coach house and stables (C) and garage (E1). Demolition of garage (D) and outbuildings (E5, E6, E7). Removal of CCTV camera poles; new CCTV cameras on building B west elevation and C north elevation. Relocation of refuse area. Minor changes to external works layout, materials and location of landscape furniture. (Approved 27/11/2012)

**12/02266/F:** Application for Full Planning Permission for Phase 1 and Outline Planning Permission for Phase 2 for proposed redevelopment of Earlham Hall environs; and Outline application for phase 2 comprising future buildings for business, research and educational uses (Class B1(a), B1(b) and D1) on the site of the nursery garden site, courtyard spaces between University Drive and Earlham Hall, pedestrian route between University Drive and Earlham Hall and associated landscaping. (Approved 01/07/2013)

**15/00809/F & 15/00810/L:** Refurbishment and alteration of existing buildings at Earlham Hall including: Potting shed (building B); coach house and stables (building C/D); garage (building E1). (Approved 24/12/2015)

**17/01595/F & 17/01596/L:** Demolition of existing garage (Building E) including adjacent bin store. Re-roofing of the south range (Building B) for creation of bike and bin store, new link and extension to Building C with associated works. Relocation of 1 No. car parking space to car park north of Earlham Hall. Installation of CCTV and external lighting to east court yard. Landscaping to courtyard and triangular garden site. (Approved 01/12/2017)

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

No other constraints/issues identified.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Greater Norwich Local Plan Regulation 18 Consultation Response: University of East Anglia

<b>Site Reference:</b>	GNLP0133 C
<b>Address:</b>	UEA - Cow Drive North
<b>Proposal:</b>	Existing undeveloped part of Blackdale allocation R40 to be carried forward.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Undeveloped part of former Blackdale school site	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> None
<b>HELAA Conclusion:</b> The site is one of a number of land parcels (A-G) within and adjoining the University campus. Site C adjoins Bluebell Road in the north-east part of the campus and is a former school building allocated and consented for development for student accommodation, the first phase of which has been completed. The site is accessible to all local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity, flood risk or contamination/ground stability. There are no nationally protected landscapes or townscapes in the immediate vicinity although there is a County Wildlife Site adjacent. There are no heritage assets in the immediate vicinity and the townscape may be enhanced through development. The Highway Authority advises that potential access constraints could be overcome through development but that the local road network is unsuitable. The site is considered suitable for the land availability assessment. The site is subject to an existing planning permission or allocation for a similar form of development, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>15/00121/F</b> - Student accommodation to provide 915 bedrooms, kitchen, dining and lounge facilities with community building comprising cafe, launderette, office space and associated works. (Approved)
<b>16/00099/MA</b> - Amendment to approved plans and variation of conditions to reflect agreed details, submission of further details and works for phase 1 development of planning permission 15/00121/F. (Approved)

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a brownfield site forming the consented second phase of the Blackdale student accommodation development at Bluebell Road allocated in the adopted local plan as site R40. The proposal reflects a form of development already agreed in principle and committed.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Greater Norwich Local Plan Regulation 18 Consultation Response: University of East Anglia

<b>Site Reference:</b>	GNLP0133 D
<b>Address:</b>	UEA - South of Suffolk Walk
<b>Proposal:</b>	Existing undeveloped allocation R41 to be carried forward.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Undeveloped open space fronting University Broad	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Market Attractiveness, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment.</p>
<p><b>HELAA Conclusion:</b> The site is one of a number of land parcels (A-G) within and adjoining the University campus. Site D is on the southern edge of the campus south of Suffolk Walk and is allocated for campus expansion. The site is accessible to local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity, flood risk or contamination/ground stability. There are no nationally protected landscapes in the immediate vicinity although development has the potential to adversely affect the setting of the listed UEA campus buildings which are part of the original Lasdun design concept, the UEA Broad (a County Wildlife Site) and locally protected river valley landscape. There is evidence of prehistoric archaeological deposits on site. Initial highway evidence has highlighted that potential access constraints could be overcome through development but that the local road network is unsuitable. The site is considered suitable for the land availability assessment. The site is subject to an existing planning permission or allocation for a similar form of development, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
No recent planning history

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a greenfield site south of Suffolk Walk with an existing allocation as a 'reserve' site for university expansion in the adopted local plan as site R41. The proposal reflects a form of development already agreed in principle and committed to address growth needs.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Greater Norwich Local Plan Regulation 18 Consultation Response: University of East Anglia

<b>Site Reference:</b>	GNLP0133 E
<b>Address:</b>	UEA - Land at the Grounds Depot Site
<b>Proposal:</b>	University related development.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Existing grounds depot site for UEA campus with allotments and nursery/agritech buildings	Part Brownfield / Part Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Flood Risk, Market Attractiveness, Significant Landscapes, Biodiversity and Geodiversity, Historic Environment, Open Space and GI, Transport and Roads, Compatibility with Neighbouring Uses.
<b>Red Constraints in HELAA:</b> Townscapes.
<b>HELAA Conclusion:</b> The site is one of a number of land parcels (A-G) within and adjoining the University campus. Site E is a partly greenfield site comprising allotments and nursery/agritech buildings at the eastern end of the UEA Broad falling between the Broad and Bluebell Road. The site is accessible to all local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity or contamination/ground stability. Parts of the site fall within areas at moderate to high flood risk. There are no nationally protected landscapes in the immediate vicinity although the adjoining County Wildlife Sites at the UEA Broad, The Heronry and Violet Grove has very significant local biodiversity value. The site also falls wholly within locally protected open space/river valley landscape and extension of built development into that area could compromise its open character and amenity value. Development also has the potential to harm the heritage interest and setting of listed campus buildings. Initial highway evidence has highlighted that potential access constraints could be overcome through development but that the local road network is unsuitable. The site is considered suitable for inclusion in the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY</b>
No recent planning history

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a brownfield site at the eastern end of the UEA Broad adjoining Bluebell Road. The site is promoted to accommodate additional student accommodation supporting the growth of the UEA as proposed in the emerging Development Framework Strategy.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- Greater Norwich Local Plan Regulation 18 Consultation Response: University of East Anglia.



<b>Site Reference:</b>	GNLP0282
<b>Address:</b>	Constitution Motors, 140-142 Constitution Hill
<b>Proposal:</b>	Redevelopment for housing.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Currently vacant, previously used for car sales and repairs.	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> None
<b>HELAA Conclusion:</b> The site is in a main road location with good accessibility to all local services. There are no known constraints from utilities infrastructure, contamination /ground stability or flood risk. There are no nationally or locally protected landscapes in the vicinity, although one locally listed building adjoins the site. Initial highway evidence has highlighted that potential access constraints on the site that could be overcome through development and that potential impact on the functioning of local roads could be mitigated. The site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>18/00917/O</b> - Outline application with all matters reserved for the erection of up to 12 dwellings. (Approved)
<b>19/01031/RM</b> - Reserved Matters of access, appearance, landscaping, layout, scale of Outline Application 18/00917/O. (Pending Consideration)

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
This car sales site on a main road location in north Norwich is benefits from outline planning permission for up to 12 homes. The principle of development is established.

<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
--

No additional information submitted.
--------------------------------------

<b>Site Reference:</b>	GNLP0360
<b>Address:</b>	May Gurney and Deal Ground Site, Trowse (part falls within South Norfolk)
<b>Proposal:</b>	Residential led mixed use redevelopment to include employment, retail community uses, potential primary education provision and local greenspace and biodiversity areas.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Part Light industrial (previously Builder's/Civil Engineer's depot/yard, currently used for vehicle storage. Contains locally protected landscapes and County Wildlife Site.	Part Brownfield / Part Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Access, Accessibility to Services, Utilities Capacity, Utilities Infrastructure, Contamination and Ground Stability, Market Attractiveness, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Open Space and GI, Transport and Roads, Compatibility with Neighbouring Uses
<b>Red Constraints in HELAA:</b> Flood Risk
<b>HELAA Conclusion:</b>  Although this former industrial site is geographically close to Norwich city centre it is isolated and has limited accessibility to some services, with complex constraints which would require significant infrastructure investment to enhance connectivity and improve deliverability. It adjoins the river Wensum which falls within the Broads Authority area and includes a County Wildlife Site and locally protected landscapes. This may give rise to particular impacts which would require mitigation through design and layout. The majority of the site is at moderate to high risk of flooding with part in the functional flood plain. Flood mitigation would be integral to achieving a satisfactory development solution. There are potential townscape impacts on heritage assets within and adjoining the site. Initial highway evidence has indicated that suitable access could be provided to the site through development. This is a heavily constrained site which has been subject to extensive feasibility work. The principle of mixed use, housing led development to support regeneration has been established as acceptable through allocation in the local plan and the grant of outline planning permission which includes enhanced access and covers nearly 90% of the site. Based on the level of constraint identified there are some uncertainties over the practicalities of delivering major development here, but subject to further assessment and excluding the part of the

site in flood zone 3b or already committed, it is considered that approximately 1ha of the site is suitable for the land availability assessment.

**FURTHER CONSULTATION COMMENTS**

No further comments received

**PLANNING HISTORY:**

12/00875/O - Outline planning application (full details of access) for a mixed development consisting of a maximum of 670 dwellings; a local centre comprising commercial uses (A1/A2/A3); a restaurant/dining quarter and public house (A3/A4); demolition of buildings on the May Gurney site (excluding the former public house); an access bridge over the River Yare; new access road; car parking; flood risk management measures; landscape measures including earthworks to form new swales and other biodiversity enhancements including the re-use of the Grade II Listed brick Kiln for use by bats.

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This strategic regeneration opportunity site in east Norwich and including land at Trowse has benefit of outline planning permission for approximately 680 homes, commercial uses, recreational open space and transport infrastructure, valid until 2023. It is a long-term strategic development priority for Greater Norwich and would secure major economic and regeneration benefits. Development potential of this land alongside the neighbouring Utilities site and land potentially available through the release of the former Carrow Works site is recognised through identification of a wider strategic regeneration area for East Norwich incorporating these three sites, to be unlocked and delivered comprehensively through an AAP and/or masterplan.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP0377
<b>Address:</b>	Land east of King Street (King Street Stores & Sports Hall Site)
<b>Proposal:</b>	Residential development for minimum of 40 - 50 dwellings with re-provision of existing sports facility/centre.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Vacant warehousing and community run sports hall.	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Townscapes, Historic Environment, Open Space and GI.</p>
<p><b>HELAA Conclusion:</b> The site is located in Norwich city centre: part is an existing housing allocation. It is highly accessible to services. There are no known constraints from utilities infrastructure or utilities capacity. A small area of the site closest to the river is prone to flood risk and there may be issues from contamination from prior industrial uses. The sensitivity of the adjoining Broads Authority area and the surrounding historic townscape of King Street would require mitigation. The existing building has little townscape merit, but it is currently in use as a sports facility and the potential loss of this use would need to be considered. Subject to this the site is considered as suitable for the land availability assessment.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<p><b>18/00277/F</b> - Replacement roof cladding and installation of solar panels to south facing roof slopes. (Approved)</p> <p><b>16/01031/F</b> - Steps to the rear door to be converted into a ramp. (Approved)</p> <p><b>15/00260/F</b> - Block up ground floor loading doors on south elevation and creation of new emergency exit on east elevation. (Approved)</p> <p><b>14/00535/F</b> - Replacement of ground floor windows and the erection of a new entrance to the north elevation. (Approved)</p>

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

In the absence of evidence that the sports hall is surplus to requirements or any detailed information on how it might be replaced or re-provided allocation of the whole site would be premature and contrary to emerging policy. Existing allocation CC8 on the King Street Stores site only is suitable to carry forward in isolation and any future proposals to develop the sports hall could be progressed through a planning application.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP0381
<b>Address:</b>	Norwich Airport Park & Ride
<b>Proposal:</b>	Redevelopment of site for small scale retail/food store, hotel, business/office use or mixed-use development.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Made surface car park - Park and Ride	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Market Attractiveness, Open Space and GI, Transport and Roads.
<b>HELAA Conclusion:</b> The site is in a main road location immediately adjoining the Airport, with good accessibility to services. There are no known constraints from utilities infrastructure, utilities capacity or flood risk: potential contamination is highlighted from prior use as a military airfield. There are no nationally protected landscapes in the vicinity but the existing landscape belts around the site are locally protected. There are no significant impacts on townscape or heritage assets. The Highway Authority have advised that potential access constraints could be overcome through development and potential impact on the functioning of local roads could be mitigated. The site is currently in use as a park and ride site and the potential loss of this use would need to be considered. Subject to this the site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
No recent planning history

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
There is no requirement for the development proposed and no basis for the release of the Park and Ride site pending decisions on its replacement and the form of the future Park and Ride network in the context of the ongoing Transport for Norwich strategy review. However, once these decisions are clarified the site would be appropriate for release.

<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
--

No additional information submitted.
--------------------------------------



<b>Site Reference:</b>	GNLP0401
<b>Address:</b>	Former Eastern Electricity Headquarters, Duke Street (Duke's Wharf)
<b>Proposal:</b>	Residential-led mixed use development for approx. 400 dwellings (could include student accommodation) with retail and/or other appropriate city centre uses at ground floor level.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Vacant buildings, site currently used as temporary car parking.	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment, Open Space and GI.</p>
<p><b>HELAA Conclusion:</b> This long-term vacant brownfield site in Norwich city centre is in a highly accessible location close to services and facilities. It is an existing mixed use (office led) allocation in the local plan. There are no known constraints from utilities infrastructure although sewerage upgrades may be necessary. There is potential contamination due to the site's prior industrial use and part of the site is at moderate risk of flooding. The site is considered a priority for regeneration, although its location adjoining the river Wensum (within the Broads Authority area) and proximity to sensitive historic townscapes in the city centre conservation area would need to be addressed in design. Initial highway evidence has indicated that there are access constraints which could be overcome through development and that any impact on the functioning of local roads could be mitigated. A number of constraints are identified but could be overcome. However, the site is subject to an existing allocation for a similar form of development, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>08/00743/F</b> - Demolition of buildings and structures at Duke Street (excluding elements of Boardman buildings) and construction of A2/B1A offices, A3

restaurant/cafes, A1 retail floorspace, D1 Art Gallery and 16 residential dwellings comprising 5 No Townhouses and 11 No. Apartments with underground car and cycle parking. (APPROVED)

**08/01354/U** - Retrospective application for use of site as a temporary car park (150 cars). (REFUSED)

**09/00929/U** - Temporary use of former staff parking areas (150 spaces) at the former Eastern Electricity offices as a shoppers' car park over the Christmas period. (REFUSED)

**11/00861/U** - Change of use of former private parking areas ancillary to the former Eastern Electricity offices to a temporary short/medium stay car park providing 93 spaces together with installation of 9 Sheffield type cycle stands. (APPROVED)

**12/00075/U** - Continued use of former private parking areas ancillary to the former Eastern Electricity offices as a temporary short/medium stay car park providing 93 spaces together with 18 cycle spaces. (TEMPORARY PERMISSION GRANTED)

**12/01494/U** - Continued use of private car park ancillary to the principal use of the site as offices to provide 93 short/medium stay public car park spaces for a period of six months. (REFUSED – APPEAL ALLOWED)

**14/00124/F** - Continued use of site to provide 93 short/medium stay public car park spaces for a further six months temporary period. (TEMPORARY PERMISSION GRANTED)

**14/01103/F** - External alteration, partial demolition and extension of riverside and Duke Street buildings to provide 29 dwellings. Demolition of central and warehouse buildings to provide redevelopment for 56 dwellings, extension of basement car park, creation of 464sqm of flexible commercial floorspace (Class A2/A3/B1(a)), associated highway and landscape works, pontoon and floating landscape platforms. (Amended description and plans/supporting documents). (APPROVED)

**14/01104/PDD** - Change of use of ground, first, second and third floors of Riverside Building; first, second and third floors of No. 8 Duke Street; and first and second floors of No. 6 Duke Street, from offices (Class B1(a)) to residential to create 69 residential units. (PRIOR APPROVAL GRANTED)

**14/01318/F** - Continuation of use of the site to provide 93 short/medium stay public car park spaces for a further temporary period. (TEMPORARY PERMISSION GRANTED)

**15/00916/F** - Change of use of ground, first, second and third floors of Riverside building, first, second and third floors of No. 8 Duke Street, and first and second floors of No. 6 Duke Street to provide 69 residential units. (APPROVED)

**15/01866/NMA** - Non-material amendments to previous permission 14/01103/F to facilitate a revised approach to the phased delivery of the development. (APPROVED)

**16/00534/F** - Continuation of use of the site to provide 93 short/medium stay public car park spaces for a further temporary period. (TEMPORARY PERMISSION GRANTED)

**17/00962/F** - Continuation of use of the site to provide 93 short/medium stay public car park spaces for a further temporary period. (TEMPORARY PERMISSION GRANTED)

**18/01117/F** - Continuation of use of the site to provide 93 short/medium stay public car park spaces for a further temporary period. (TEMPORARY PERMISSION GRANTED)

**19/00838/F** - Continuation of use of the site to provide 93 short/medium stay public car park spaces for a further temporary period. (REFUSED)

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a key city centre regeneration opportunity site allocated for office-led development (CC21) which is long term vacant aside from a temporary car park use. Despite a succession of consented schemes including most recently for office to residential conversion and new build potentially delivering 156 dwellings, the site remains stalled. As a key regeneration priority, a concerted effort is required to bring the site forward and maximise its development potential, accordingly identification in the GNLP is highly desirable.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

- GI Strategy
- Site Access
- Preliminary Ecological Appraisal
- Proposal Map

<b>Site Reference:</b>	GNLP0409R
<b>Address:</b>	Barrack Street / Whitefriars
<b>Proposal:</b>	Residential-led mixed use development with some retail.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
<p>The site was formally occupied by Jarrolds Printworks but is now largely vacant.</p> <p>The site is currently used for/comprises the following features: A temporary surface car park within the eastern part of the site, an unoccupied maintenance building which is attached to remains of the City Wall (Scheduled Ancient Monument). St James' Mill Annex which currently houses the John Jarrold Printing Museum. A pair of listed cottages fronting Barrack Street (77-79) a row of terrace properties and a garage block.</p>	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Townscapes, Historic Environment, Transport and Roads.</p>
<p><b>HELAA Conclusion:</b> Residential-led (200 dwellings) mixed use development, 350sqm retail on a brownfield riverside site close to the city centre at Barrack Street, with access taken from Gilder's Way. Given the city centre location of the site, it has good access to key services and workforce catchment. The Highways Authority require further information. There is potential contamination on the site as it was formerly a factory/print works, and the eastern third of the site is in Flood Zone 2 and at risk of surface water flooding. 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 city centre conservation area, a listed building, city walls &amp; towers (scheduled monuments) on site. However, there are no ecological constraints and no loss of publicly accessible open space. The site has some constraints, but it is considered that these could be mitigated, and the site is considered suitable for the land availability assessment.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

**PLANNING HISTORY:**

**15/01927/O** - Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces. (APPROVED)

**18/01286/F** - Demolition of existing buildings and structures; erection of 218 dwellings; conversion, refurbishment and extension of two Grade II Listed Cottages, erection of 310sqm of commercial floorspace (Class A1-A5 use) and 152sqm of Museum floorspace (D1 use), with associated works. (APPROVED)

**18/01287/L** - Conversion, refurbishment and extension of 77-79 Barrack Street and alterations to the western boundary wall of the site. (APPROVED)

**19/01458/NMA** - Amendment to planning permission 18/01286/F. (APPROVED)

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a key city centre regeneration opportunity site currently allocated for office development (CC17b). The site has approval for a detailed scheme of 218 dwellings, commercial floorspace and a replacement museum. It adjoins vacant land on Barrack Street north of Gilders Way which has outline consent for mixed use development including 200 homes and is also allocated for a comparable mix of uses in the local plan (CC17a). The latter site will be considered separately as part of the assessment of the reallocation potential of existing commitments. GNLP409R is suitable to shortlist, allocation would be appropriate in conjunction with the adjoining site if progressed.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP0451
<b>Address:</b>	Sentinel House, 37-45 Surrey Street.
<b>Proposal:</b>	Town centre uses or mixed-use development of undetermined type.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
The formerly redundant offices have now been converted to residential flats, the adjoining land is predominantly disused, also containing an area of surface car parking	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Townscapes, Historic Environment
<b>HELAA Conclusion:</b> This site comprises redundant offices and adjoining disused land in a highly accessible location in Norwich city centre, close to services and facilities. The main building is being converted for housing and the remaining land is subject to proposals for student accommodation development. There are no known constraints from utilities capacity, utilities infrastructure, flood risk or contamination/ground stability. There are potential impacts on the character of the city centre conservation area, below ground archaeology (City Wall) and the setting of heritage assets, although the existing building is of little merit. Initial highway evidence has indicated that potential access constraints could be overcome through development and that any impact on the functioning of local roads could be mitigated. The site has relatively few constraints but as it is already under construction for housing, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>11/02164/CLE</b> - Application for a Certificate of Lawful Use for the continued use of the site for car parking ancillary to the main use of Sentinel House. Status: Application Approved
<b>17/01295/F</b> - Redevelopment of site to provide 285 student bedroom development with associated access and landscaping.

Status: Application Refused

**18/00437/F** - Redevelopment of site to provide 252 student bedroom development with associated access and landscaping.

Status: Application Refused

**18/00011/REF** - Redevelopment of site to provide 285 student bedroom development with associated access and landscaping.

Status: Appeal dismissed

**18/00026/REF** - Redevelopment of site to provide 252 student bedroom development with associated access and landscaping.

Status: Appeal allowed

**19/01405/MA** - Material amendment of 18/00437/F (allowed on appeal) to replace drawings listed as approved under Condition 2 and Condition 14.

Status: Pending Consideration

**19/01510/D** - Details of Condition 3: construction management plan of previous permission 18/00437/F (allowed on appeal).

Status: Pending Consideration

**19/01558/D** - Details of condition 4: Contamination risk assessment of previous permission 18/00437/F.

Status: Pending Consideration

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This city centre site comprises a 1980s built former office building and vacant land to the east. Sentinel House was subject to two prior approval applications for office to residential conversion under permitted development, both approved subsequent to the GNLP submission. The most recent consent for 199 apartments has been implemented and occupied. The adjoining land forms part of site CC29 allocated for housing in the local plan. This part of the site is subject to a refused and appealed application for a 252-bed student accommodation development. Notwithstanding the refused scheme the allocated land east of Sentinel House offers significant regeneration potential. Suitable to shortlist excluding the implemented part of the site (Sentinel House itself).

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP0506
<b>Address:</b>	Anglia Square
<b>Proposal:</b>	Mixed use redevelopment, to include approximately 20,000m <sup>2</sup> retail floorspace, 1,500 dwellings, 1,200 car parking spaces and community and leisure uses including a cinema. The site does not include Surrey Chapel or the former Barclays Bank site.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Shopping centre, vacant office, cinema & multi-storey car park. Artist studios, surface car parking including car-wash, Chapel and community uses.	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Flood Risk, Townscapes, Historic Environment, Transport and Roads, Compatibility with Neighbouring Uses.
<b>HELAA Conclusion:</b> This site in the northern part of Norwich city centre comprises an existing district shopping centre and areas of vacant land/surface car parking and a variety of other buildings many of which are vacant or underused. It is highly accessible to local services and facilities. There are no known constraints from utilities infrastructure; however, sewerage upgrades and mains reinforcement would be necessary to serve development. There are no known contamination issues but there is surface water flood risk on parts of the site. Anglia Square falls within the city centre conservation area and is close to a number of heritage assets. The large scale of development proposed has the potential for adverse impacts on the historic setting of this part of the city although the existing townscape is very poor with much scope for regeneration and improvement. There are no nationally or locally protected landscapes in the vicinity and development has the potential to enhance local green infrastructure. Initial highway evidence has highlighted that potential access constraints could be overcome through development and that any impact on the functioning of local roads could be mitigated. The site is almost entirely covered by an existing permission for mixed use. Although the proposed mix is different, the HELAA seeks to identify additional land which might be developed for either economic or residential use. Therefore, only 0.25ha is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received



**PLANNING HISTORY:**

**07/01347/C** - Demolition to facilitate comprehensive regeneration of Anglia Square and environs for mixed use development.

Status: Application Withdrawn

**07/01349/F** - Comprehensive regeneration of Anglia Square and environs for mixed use development, including detailed proposals for residential tower (block A) and foodstore and full details of servicing, car parking, access (including enhanced pedestrian, cycle, public transport accessibility, bridge link from St Crispins, foodstore service bridge and closing of subway) and proposed Edward Street/Pitt Street link road. Establishing the principle of additional retail (Class A1) and residential (Class C3), food and drink uses (Classes A3, A4 and A5), office use (Class B1), the potential relocation of Surrey Chapel (Class D1) and enhancement of landscaping including enlarged square. NB Application accompanied by Environmental Statement submitted under the Environmental Impact Assessment Regulations.

Status: Application Withdrawn

**08/00974/F** - Comprehensive regeneration of Anglia Square and environs for mixed use development, including detailed proposals for residential (Block A) and foodstore and full details of servicing, car parking, access (including enhanced pedestrian, cycle, public transport accessibility, bridge link from St. Crispins, and closing of subway), siting of ground floor units and detail of proposed Edward Street / Pitt Street link road. Establishing the principle of additional retail (Class A1) and residential (Class C3), food and drink uses (Classes A3, A4 and A5), health centre (Class D1), the potential relocation of Surrey Chapel (Class D1) and enhancement of landscaping including an enlarged square.

Status: Application Approved

**08/00975/C** - Demolition to facilitate comprehensive regeneration of Anglia Square and environs for mixed use development.

Status: Application Approved

**11/00160/F** - Phase 1(a) of the comprehensive regeneration of Anglia Square and environs for mixed use development, including an enlarged Anglia Square, detailed proposals for a new 7,792 sq.m. foodstore, supported by 507 car park spaces, and full details of servicing, car parking (both permanent and temporary), access (including enhanced pedestrian, cycle, public transport accessibility, a bridge link from St Crispins Road, and closing of subway). Detailed proposals for additional retail and other town centre uses (Class A1, A2, A3, A4) totalling 3,565 sq.m. net, a creche (Class D1, 304 sq.m.) and up to 91 residential units (Class C3) in mixed private/housing association use. Outline planning application to establish further residential development (a possible further 16 housing association units) on land west of Edward Street.

Status: Application Approved

**11/00161/F** - Phases 1(b) and 2(a) of proposed regeneration of Anglia Square and environs for mixed use development, including: fully detailed planning application

for Phase 1(b) east of the enlarged square, comprising additional retail and food and drink uses (Class A1/A3) with a total of 2,985 sq.m. net; rooftop parking providing 99 spaces and 29 private flats with temporary car parking; external refurbishment of Gildengate House offices and improvement to existing office entrance. Outline planning application for Phase 2(a) north of the enlarged square, to establish the principle of additional retail and food and drink uses (Class A1/A3) of 2,094 sq.m. and the provision of a gym (Class D2) of 1,478 sq.m.  
Status: Application Approved

**11/00162/O** - Phase 2(b) of proposed regeneration of Anglia Square and environs for mixed use development; outline application to establish the principle of Class D2 (Assembly and Leisure) uses with ancillary Class A1/A3 uses.  
Status: Application Approved

**11/00163/C** - Demolition to facilitate the comprehensive regeneration of Anglia Square and associated development proposals as applied for under 3 planning applications (11/00160/F, 11/00161/F and 11/00162/O).  
Status: Application Approved

**17/00433/EIA1** - EIA screening opinion request for the redevelopment of the site to provide up to 1,350 new residential dwellings (Class C3), a proportion of which could be delivered as a hotel (Class C1) or student accommodation (Sui Generis). In addition, up to 15,000 sqm GIA (including servicing areas and loading bays) of commercial floorspace at principally ground floor as retail (A1/A2/A3/A4 Use Classes), but to include a cinema (Class D2) of up to 2,350 sqm GIA, and other non-residential uses of approximately 500 sqm GIA to include workshop/artist studio space, office, and/or a doctor's surgery will be provided on the lower floors, with associated public and private car parking and access, landscaping and servicing.  
Status: EIAREQ

**17/00434/EIA2** - EIA scoping opinion request for the redevelopment of the site to provide up to 1,350 new residential dwellings (Class C3), a proportion of which could be delivered as a hotel (Class C1) or student accommodation (Sui Generis). In addition, up to 15,000 sqm GIA (including servicing areas and loading bays) of commercial floorspace at principally ground floor as retail (A1/A2/A3/A4 Use Classes), but to include a cinema (Class D2) of up to 2,350 sqm GIA, and other non-residential uses of approximately 500 sqm GIA to include workshop/artist studio space, office, and/or a doctor's surgery will be provided on the lower floors, with associated public and private car parking and access, landscaping and servicing.  
Status: EIASCR

**17/02003/EIA2** - EIA scoping opinion request for the redevelopment of the site to provide up to 1,350 new residential dwellings (Class C3), a proportion of which could be delivered as a hotel (Class C1) or student accommodation (Sui Generis). In addition, up to 15,000 sqm GIA (including servicing areas and loading bays) of commercial floorspace at principally ground floor as retail (A1/A2/A3/A4 Use Classes), but to include a cinema (Class D2) of up to 2,350 sqm GIA, and other non-residential uses of approximately 500 sqm GIA to include workshop/artist

studio space, office, and/or a doctor's surgery will be provided on the lower floors, with associated public and private car parking and access, landscaping and servicing.

Status: Pending Consideration

**18/00330/F** - Part Full/Outline application for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for: up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas (please see the Application Form for a detailed description of the proposal - all plans and drawings are available at [www.angliasquarestatutoryconsultation.co.uk](http://www.angliasquarestatutoryconsultation.co.uk)).

Status: Pending Consideration

**19/00007/CALLIN** - Part Full/Outline application for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for: up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas (please see the Application Form for a detailed description of the proposal - all plans and drawings are available at [www.angliasquarestatutoryconsultation.co.uk](http://www.angliasquarestatutoryconsultation.co.uk)).

Status: Appeal in progress

#### **OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

Anglia Square is a strategically important long-term regeneration priority in the northern city centre (previously allocated in the Northern City Centre Area Action Plan) which has great potential as a catalyst for area wide regeneration and the delivery of a significant quantum of housing contributing to Norwich's allocation requirement, alongside major economic benefits for the city and Greater Norwich as a whole. Following resolution to approve a mixed-use regeneration scheme including 1250 homes and commercial floorspace (December 2018), the application has been called-in by the Secretary of State and will now be considered at a Public Inquiry. Notwithstanding the uncertainty over the current proposals, the strategic importance and major regeneration benefits of the site require appropriate recognition in the GNLP.

#### **BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP0570
<b>Address:</b>	Site of Former Church, Heartsease Lane.
<b>Proposal:</b>	Residential as an alternative to church redevelopment.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Church	Brownfield / part greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Open Space and GI, Compatibility with Neighbouring Uses.</p>
<p><b>HELAA Conclusion:</b> This site in a suburban location on the outer ring road in east Norwich. It is highly accessible to local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity, flood risk or contamination/ground stability. There is a nationally protected SSSI within 2km and the immediately adjacent Mousehold Heath is of major local importance for its landscape, ecological, heritage and biodiversity value all of which have the potential to be impacted by development. The site includes open space with local policy protection. Initial highway evidence has highlighted that potential access constraints could be overcome through development and that any impact on the functioning of local roads could be mitigated. The site is considered suitable for the land availability assessment.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<p><b>19/00007/F</b> - Construction of new church auditorium with associated children and youth facilities, nursery and car parking with external works and new pedestrian access.</p> <p><b>14/01758/U</b> - Change of use of front of site to car valeting centre (class B1) with ancillary cafe and erection of canopy.</p>

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
--

Site was previously a private sports club and most recently a (now demolished) place of worship. Site could be appropriate for a carefully designed and integrated housing development although proposals for redevelopment as a church with no residential element have recently been approved. Given the uncertainty over whether any housing is likely to be deliverable, the site is a reasonable alternative but is not preferred for allocation at the current time.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP2114
<b>Address:</b>	St Georges Works, Muspole Street
<b>Proposal:</b>	Residential-led mixed use development.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Flexible office space	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Flood Risk, Market Attractiveness, Townscapes, Biodiversity and Geodiversity, Historic Environment.
<b>HELAA Conclusion:</b> The site is proposed for residential-led mixed use development on a brownfield site on Muspole Street. Given the city centre location of the site, it has good access to key services and workforce catchment. The Highways Authority have stated 'no comment' but it is assumed that a suitable access could be achieved and that local roads could absorb any increase in traffic. Muspole Street is in Flood Zone 2 and has surface water flood risk at 1:1000 which may affect access decisions. The site is surrounded by listed buildings and is in the city centre conservation area, which would influence any scheme on the site. There are scheduled monuments near the site, and a SSSI within 3km. Although the site is constrained, the majority is considered suitable for the land availability assessment, although it is important not to double count the existing commitment to the north of the site.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>08/00866/F</b> - Redevelopment of site to provide 47 No. apartments and 10 No. houses with associated works including enhancement of external areas and provision of formal parking areas. (Amended Design). Status: Application Approved
<b>08/00867/C</b> - Demolition of modern extensions to Lion House and Seymour House and demolition of single storey detached buildings to east of site. Status: Application Approved

**12/00143/ET** - Extension of time period for the commencement of development for previous planning permission 08/00866/F 'Redevelopment of site to provide 47 No. apartments and 10 No. houses with associated works including enhancement of external areas and provision of formal parking areas. (Amended Design)'.  
Status: Application Approved

**12/00144/ET** - Extension of time period for previous conservation area consent 08/00867/C 'Demolition of modern extensions to Lion House and Seymour House and demolition of single storey detached buildings to east of site.'  
Status: Application Approved

**15/01512/PDD** - Conversion of offices to residential (23 No. dwellings).  
Status: Prior Approval Approved.

**15/01480/VC** - Removal of Condition 2 to remove the phasing element of the approved scheme; amendments to the wording of Conditions 3-10 and 15-20; and variation of Condition 21 to allow for minor changes to the approved plans of planning permission 12/00143/ET.  
Status: Application Withdrawn

**15/01713/PDD** - Change of use of offices to residential to provide 37 No. apartments.

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This former factory site was previously allocated in the Northern City Centre Area Action Plan for housing development and was subject to a now expired planning permission for redevelopment and conversion providing 57 homes. Prior approval applications have been granted on office premises within the site (The Guildyard, Colegate and Seymour House, Muspole Street) potentially delivering 60 flats. Outline regeneration proposals have been publicised alongside the nearby St Mary's Works site, for which there is a consented outline scheme, under the "Shoe Quarter" initiative. The building is currently used beneficially as managed workspace but in the event of more substantive development proposals the site is capable of delivering a more substantial housing led development with significant regeneration benefits.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP2137
<b>Address:</b>	Land at Riverside
<b>Proposal:</b>	Mixed use development including residential, offices, increased leisure and recreational activities, hotels and retail.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Retail, Leisure, Residential	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<p><b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Flood Risk, Significant Landscapes, Townscapes, Historic Environment, Compatibility with Neighbouring Uses.</p>
<p><b>HELAA Conclusion:</b> The site encompasses the entire existing Riverside development, including the bars, restaurants, Odeon cinema, Morrisons supermarket, retail units and car parks. Promoters want to promote mixed uses, including residential, offices, increased leisure, recreational activities and hotels, but the details are subject to further assessment. Given the city centre location the site clearly has good access to key services and workforce catchment. The site's size, and location, means there are both significant constraints and significant opportunities. Considerations include: fluvial flood risk (Flood Zone 2), surface water flood risk; and, that on the opposite side of the River Wensum is the City Centre Conservation Area and various listed buildings. The stated intention of the promoters is to respond to changing market conditions and to increase the leisure and recreational offer. Although successfully redeveloped, on the basis that Riverside could yield additional floorspace, or a different mix of uses, it is considered reasonable to include in the land availability assessment.</p>

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
No relevant recent planning history

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
Proposed relaxation of uses considered acceptable in principle; however, not considered suitable for allocation due to the absence of further evidence on the



precise form of development and the quantum of housing which might be deliverable. A specific allocation is not considered necessary.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP2159
<b>Address:</b>	Sites at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane car park
<b>Proposal:</b>	Residential development (150 dwellings proposed).

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Car/motorbike showroom/repairs	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Townscapes, Historic Environment.
<b>HELAA Conclusion:</b> This is a 0.7 ha site proposed for a high-density residential development of 150 dwellings, on the Lind Garage site in Ber Street. Given the city centre location of the site, it has good access to key services and workforce catchment. The Highways Authority have stated 'no comment' but it is assumed that a suitable access could be achieved and that local roads could absorb any increase in traffic. Considerations include the constraints to redeveloping brownfield land and the townscape matters of building near listed buildings along Ber Street and in the City Centre Conservation Area. The loss of commercial uses in the City Centre is a further factor, but the site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>84-120 Ber Street:</b>
<b>05/00281/C</b> - Demolition of existing showrooms, offices and workshops. Status: Application Approved
<b>05/00282/F</b> - Demolition of garage building and redevelopment of sites for the erection of 164 flats (56 x one-bedroom, 106 x two bedroom and 2 x three bedroom apartments) and 167 car parking spaces (Revised scheme). Status: Application Refused
<b>05/01198/U</b> - Change of use from workshop and showroom to retail (Class A1). Status: Application Refused

**05/01199/U** - Use of land for contract car parking.

Status: Application Approved

**08/00490/F** - Demolition of garage building and redevelopment of sites for the erection of 151 flats (50 x one-bedroom, 4 x studio, 79 x two bedroom and 18 x three bedroom apartments) with 148 basement car parking spaces and secure cycle storage.

Status: Application Approved

**12/02312/F** - Conversion and change of use of part former commercial garage premises (Class Sui Generis) to health club (Class D2) with single storey extension link to 106 Ber Street.

Status: TEMP

**15/00057/VC** - Removal of Condition 1 (temporary permission until May 2016) of previous planning permission 12/02312/F.

Status: Application Approved

**147-153 Ber Street**

No recent planning history

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

The site is considered to offer considerable regeneration benefits and could deliver a significant quantum of housing including affordable housing.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP2163
<b>Address:</b>	Friars Quay car park, Colegate.
<b>Proposal:</b>	Residential development of 44 dwellings.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Car park	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Townscapes, Historic Environment.
<b>HELAA Conclusion:</b> This is a 0.12 ha site proposed for a high-density residential development of 44 dwellings, on the Colegate car park site. Given the city centre location of the site, it has good access to key services and workforce catchment. The Highways Authority has stated 'no comment' but it is assumed that a suitable access could be achieved and that local roads could absorb any increase in traffic. Considerations include the constraints to redeveloping brownfield land and the townscape matters of developing near listed buildings and in the City Centre Conservation Area. The loss of car parking in the City Centre is a further factor, but the site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
14/01282/F - Demolition of existing building and redevelopment of site to provide 44 residential flats. (WITHDRAWN)

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
Site considered appropriate for allocation

<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
No additional information submitted.

<b>Site Reference:</b>	GNLP2164
<b>Address:</b>	West of Eastgate House, Thorpe Road
<b>Proposal:</b>	Residential development of 20-25 dwellings.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Surface car parking	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Flood Risk, Townscapes, Biodiversity and Geodiversity, Historic Environment.
<b>HELAA Conclusion:</b> This is a 0.19 ha site proposed for 20-25 dwellings, on land west of Eastgate House on Thorpe Road. Given the city centre location of the site, it has good access to key services and workforce catchment. The Highways Authority has raised no in principle objection to the site. Other considerations include the townscape matters of developing near to listed buildings, areas of land with Tree Preservation Orders, and in the Thorpe Ridge Conservation Area. The loss of commercial uses in the City Centre is a further factor, but the site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>16/01889/O</b> - Outline application for the erection of 20 no. apartments including associated parking and amenity space. (REFUSED)

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
Site considered appropriate for allocation for residential development.

<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
No additional information submitted.

<b>Site Reference:</b>	GNLP3050
<b>Address:</b>	Sainsbury Homebase Site, Hall Road Retail Park
<b>Proposal:</b>	Housing

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Warehouse retail & associated parking	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> Access, Contamination and Ground Stability, Flood Risk, Market Attractiveness, Compatibility with Neighbouring Uses.
<b>HELAA Conclusion:</b> This is a 2.28ha brownfield site located in the Hall Road Retail Park at the junction of Hall Road and Sandy Lane. It comprises the existing Homebase DIY retail store and customer car park which forms part of the parking area serving the wider retail park development. Initial evidence from the Highway Authority indicates that access is achievable, and that the local road network is suitable. The Hall Road District Centre provides access to a range of services and facilities and Hall Road is on a high- frequency bus route. There are no known constraints from utilities infrastructure or ground instability. Previous automotive uses on the site indicate that there may be some risk from prior contamination. Relatively small areas of the site are subject to some degree of surface water flood risk and it falls within Flood Zone 1. There would be no loss of local open space arising from development. Locating housing immediately adjacent to an operational retail park is not considered ideal in planning terms and would require careful design to achieve effective segregation; additionally, interposing residential use between two retail centres would effectively sever the retail park from the currently adjacent Hall Road District Centre and prevent proper connectivity between the two sites. However, the site is considered suitable for the land availability assessment.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<b>4/95/0774/O:</b> Outline planning permission was granted in June 1996 for the construction of a non-food retail warehouse (bulky goods) development
<b>4/1999/0478/D (reserved matters):</b> approved in March 2000 for the 'erection of a single retail warehouse unit of 7,440 sqm with open garden centre'. The unit is now occupied by Homebase.

**18/01881/VC** - Variation of Condition 10 of previous permission 4/1995/0774/O to allow the sale of additional product types.

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

Due to the commercial/employment character of the area, development for residential purposes may be incompatible with neighbouring uses.  
Current proposals to retain the retail use and subdivide the unit will mean that the site is now unlikely to come forward for alternative forms of development.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

<b>Site Reference:</b>	GNLP3053
<b>Address:</b>	Land at Carrow Works
<b>Proposal:</b>	Residential led mixed-use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Employment/Manufacturing (Britvic Soft Drinks Ltd. and Unilever UK Ltd.)	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> To be completed.
<b>HELAA Conclusion:</b> To be completed.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
There is no recent planning history relevant to the proposed allocation.

<b>OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:</b>
Subject to HELAA conclusion. This site has not been put forward by the landowner at this time, but has been considered strategically important for consideration.

<b>BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION</b>
No additional information submitted.



<b>Site Reference:</b>	GNLP3054
<b>Address:</b>	St Mary's Works and St Mary's House, Duke Street, Norwich
<b>Proposal:</b>	Comprehensive mixed-use development to include residential (approx. 150) and employment uses, with the possible addition of a hotel.

<b>CURRENT USE OF SITE:</b>	<b>BROWNFIELD/GREENFIELD:</b>
Employment/Workshop & associated parking	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA</b>
<b>Amber Constraints in HELAA:</b> To be completed.
<b>HELAA Conclusion:</b> To be completed.

<b>FURTHER CONSULTATION COMMENTS</b>
No further comments received

<b>PLANNING HISTORY:</b>
<p><b>13/01685/F</b> - Construction of 8 No. two bedroom apartments on roof at second and third floors of former shoe factory building with access stairwells, demolition of single storey commercial extensions at rear of factory building and creation of car parking spaces. Change of use of existing first floor from D2 (assembly and leisure) to B1(a) (office) <b>Withdrawn</b>.</p> <p>16/01950/O - Outline planning application to include the demolition of office/workshop buildings; part demolition/part retention, conversion and extension of St Mary's Works building and redevelopment of the site to provide circa 151 residential units (Use Class C3); circa 4,365sqm office floor space (Use Class B1a); circa 3,164sqm hotel and ancillary restaurant facility (Use Class C1); circa 451sqm retail (Use Class A1/A3); circa 57sqm gallery space (A1/D1); circa 124 parking spaces and associated landscaping works (amended description and plans). <b>Approved</b> 03/05/2018.</p> <p><b>19/00173/EIA1</b> - EIA screening opinion for the demolition of office/workshop buildings; part demolition/part retention, conversion and extension of St Mary's Works building and redevelopment of the site to provide circa 151 residential units (Use Class C3); circa 4,365sqm office floor space (Use Class B1a); circa 3,164sqm hotel and ancillary restaurant facility (Use Class C1); circa 451sqm retail (Use Class A1/A3); circa 57sqm gallery space (A1/D1); circa 124 parking spaces and associated landscaping works. <b>EIARQ (required)</b></p>

**19/00430/F** - Demolition of office and workshop buildings and the redevelopment of the site together with the part demolition and conversion of the former Shoe Factory Building, to provide 152 residential units (Class C3), employment space (Class B1), a hotel and ancillary restaurant (Class C1), retail units (Class A1/A3), gallery and exhibition space (Class D1), car parking, landscaping and public realm improvements, access and associated works. **Withdrawn.**

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

Subject to HELAA conclusion.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION**

No additional information submitted.

## **STAGE 7 – SETTLEMENT BASED APPRAISAL OF REASONABLE ALTERNATIVE SITES AND IDENTIFICATION OF PREFERRED SITES (WHERE APPROPRIATE) FOR REGULATION 18C DRAFT PLAN CONSULTATION.**

Despite the relatively limited number of sites promoted in Norwich for potential allocation, some are of substantial size and complexity. Overall there is a wide variation in terms of site size, mix of uses and location, with many proposals presenting site-specific and detailed issues and for which there may be no easily comparable and/or reasonable alternative option. The approach taken to shortlisting has, consequently, applied additional locally specific suitability criteria (in addition to those set out in the HELAA) to determine the site's potential to deliver local and strategic objectives in the context of emerging policies. These are:

- **Site size**: - sites with a capacity of less than 15 dwellings will not generally be shortlisted for allocation as they would be unable to deliver a meaningful amount of affordable housing.
- **Compatibility with emerging policy**: sites which are clearly contrary either to the NPPF or the direction of emerging policy in the GNLP will not normally be acceptable candidates for shortlisting.
- **Brownfield/Greenfield status**: Maximising the potential of previously developed land is a key priority of the GNLP and national policy, consequently sites proposing the development of greenfield land without compelling evidence of overriding benefits will not generally be shortlisted.
- **Long-term vacancy or dereliction**: Several sites in Norwich, especially the city centre, have been identified as suitable for development for many years but remain vacant or derelict and underused. Priority needs to be given to unlocking these stalled sites through targeted investment and action in collaboration with other stakeholders and agencies: allocation in the GNLP helps to signal that intention and favours of shortlisting.
- **Previously allocated site**: many promoted sites are allocated in current or previously adopted local plans and/or the Northern City Centre Area Action Plan. The principle of development has been established and they may offer opportunities for higher density development or a different mix of uses to contribute additional homes to the GNLP housing requirement. Unless there is evidence that these sites cannot be delivered, the existence of a previous allocation will generally favour shortlisting.
- **Site of strategic scale or importance**: Where a site proposal is of a scale or significance which will be strategically important in achieving GNLP objectives over a wider area, it will generally merit shortlisting.
- **Clear physical or economic regeneration benefits**: Similarly, a site can deliver demonstrable benefits in terms of physical or economic regeneration, this will generally favour shortlisting.
- **Ownership**: Land in city council or other public ownership may be able to contribute significantly to achieving GNLP objectives, for example through the delivery of affordable homes.
- **Active proposals for development**: Sites promoted through the Call for Sites for consideration for the GNLP may also be subject to active development

proposals pursued in parallel, either through pre-application discussions, consultations or a current planning application or a subsequent permission. Sites with active proposals and a clear intention to bring those sites forward are favoured for shortlisting over proposals which are purely speculative and not supported by evidence of deliverability.

Promoted sites are excluded from consideration for shortlisting if:

- a) An approved application for a similar form of development on the same site has since been implemented (i.e. is under construction or already complete): the only exception to this will be where sites are of a strategic scale and/or implementation has only occurred on part of the site;
- b) The proposal does not involve any substantive new development or change of use meriting an allocation (for example where it requests a change to the policy approach applying to an existing facility or asks for specific recognition of an existing facility solely to safeguard its current use). Neither are appropriate matters for site specific allocations and are better dealt with by thematic policies in the GNLP and/or through a review of applicable development management policies and designations.
- c) The proposal is, or appears to be, contrary to the direction of emerging policies in the GNLP or potentially contrary to the NPPF.
- d) The site is likely to be too small to allocate (generally with a capacity of 15 dwellings or fewer or a site area of less than 0.4 hectare)

The promoted sites have been assessed against the above criteria and an analysis is set out in the table below.

**Sites preferred for shortlisting are:**

Of the residential or residential-led proposals, Sites **GNLP0068** (Duke Street, site adjacent Premier Inn); **GNLP0282** (Constitution Motors, Constitution Hill); **GNLP0360** (Deal Ground, Bracondale/May Gurney site, Trowse) **GNLP3053** (Carrow Works); **GNLP0401** (Duke Street, Dukes Wharf); **GNLP409R** (Barrack Street/Whitefriars); **GNLP0451** (land adjoining, but excluding, Sentinel House); **GNLP0506** (Anglia Square\*); **GNLP3054** (St Mary's Works, Duke Street\*), **GNLP2114** (St Georges Works Muspole Street\*); **GNLP2159** (Sites at 84--120 Ber Street, 147-153 Ber Street and Mariners Lane car park); **GNLP2163** (Friars Quay Car Park, Colegate\*) and **GNLP2164** (West of Eastgate House Thorpe Road) are proposed for shortlisting as likely to offer the widest range of benefits and most likely to be deliverable based on active development interest coupled with overall sustainability and consistency with existing and emerging policies. The Barrack Street/Whitefriars site, if progressed to allocation, should also include the adjoining land fronting Barrack Street and Gilders Way which is largely coincident with adopted local plan allocation CC17a.

*(\*sites marked with an asterisk include former Northern City Centre Area Action Plan allocations)*

Of the sites proposed for other uses **GNLP0133-B, GNLP0133-C, GNLP0133-D and GNLP0133-E** at the UEA (respectively land at Earlham Hall; Land at the Blackdale Building, Bluebell Road, land south of Suffolk Walk and the former Grounds Depot Site, Bluebell Road ); are preferred for shortlisting based on their status as adopted local plan allocations and/or permissions and/or a clear intention to bring them forward during the plan period.

### PREFERRED SITES

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
Land adjacent to the River Wensum and the Premier Inn, Duke Street	GNLP0068	0.12	Residential led mixed-use development for a minimum of <b>25 homes</b> .	This is a prominent brownfield site in the northern city centre which is long term vacant and offers the potential for beneficial regeneration and redevelopment including improved access to the river.
UEA - Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery)	GNLP0133-B	1.38	University-related uses, including offices (Use class B1(a)), research and development (Use class B1(b)) and educational uses (Use class D1) providing in the region of 5,000 sqm of floorspace	The principle of development has been established by virtue of the existing local plan allocation (R39) and outline planning permission. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).
UEA – Land North of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House)	GNLP0133-C	0.89	Student accommodation, (a minimum of <b>400 beds</b> (equivalent to 160 homes)) may include a small element of ancillary university related uses.	The principle of development has been established by virtue of the existing local plan allocation (R40) and consented and partly completed scheme for student accommodation. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). As an extant consent and previous allocation; this site is been counted in the commitment figures.
UEA – Land between Suffolk Walk and Bluebell Road	GNLP0133-D	2.74	University related development for both academic	The principle of development has been established by virtue of the existing local plan allocation (R41) as a strategic reserve for university

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
			and non-academic uses.	expansion. Its allocation for development remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).
UEA - Land at the Grounds Depot Site, Bluebell Road	GNLP0133-E	1.60	Student accommodation, in the region of <b>400 beds</b> (equivalent to 160 homes) which may include a small element of ancillary university related uses	The site has been developed and in operational use for several years as a ground's maintenance depot. Although in a prominent and sensitive river valley location with respect to the campus and the UEA Broad, on balance it is considered that the site offers the best opportunity to accommodate limited development to support the expansion of the UEA and will enable further enhancement and greater public access to the river valley, with the proviso that any development must be sensitively designed and integrated into the landscape.
Land at Constitution Motors, 140-142 Constitution Hill	GNLP0282	0.27	Redevelopment for a minimum of <b>12 homes</b> .	The site is located in a predominantly residential area and is appropriate for residential use. It now has benefit of outline planning permission, as such has been counted in the commitment figures
Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk	GNLP0360	21.90	Residential led mixed-use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space together with all necessary supporting	This strategic regeneration opportunity site in east Norwich and including land at Trowse has benefit of outline planning permission for up to 680 homes, commercial uses, recreational open space and transport infrastructure, valid until 2023. It is a long-term strategic development priority for Greater Norwich and would secure major economic and regeneration benefits but is subject to complex constraints identified through the HELAA. Development potential of this land alongside the neighbouring Utilities site and land potentially available through the

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
			vehicular, pedestrian, cycle and public transport access infrastructure. <b>680 homes.</b>	release of the former Carrow Works site is recognised through a wider strategic growth allocation across the three sites which is expected to deliver a total of approximately 2,000 homes. <i>Note that the May Gurney site falls within Trowse parish and approximately 90 homes of the 680 approved are included within the housing commitment for Trowse parish.</i>
Former Eastern Electricity Headquarters (Dukes Wharf), Duke Street	GNLP0401	0.83	Residential-led mixed-use development including a minimum of <b>100 homes</b> (or at least 250 student bedrooms). May also include employment, managed workspace retail, leisure, financial and professional services, education and cultural uses.	This long-term vacant regeneration opportunity site was previously allocated for office-led development in the adopted local plan (CC21) but remains stalled despite a succession of consented schemes. Allocation in the GNLP is wholly appropriate to recognise its considerable potential for regeneration for both housing and commercial uses taking advantage of its riverside site and highly accessible city centre location close to the primary shopping area. 69 units are counted in the existing commitment, the site is expected to deliver an uplift of an additional 31 units.
Land at Barrack Street/ Whitefriars	GNLP0409R	3.78	Residential led mixed-use development (minimum <b>300 homes</b> ), offices/managed workspace, ancillary retail, restaurants, bars and recreational open space.	This key regeneration site in the city centre is long term vacant. It is appropriate to amalgamate the existing adopted local plan allocations CC17a and CC17b in a single allocation which acknowledges the acceptance in principle of current proposals to develop its western half nearest to Whitefriars for a residential-led scheme. Outline and detailed consents on its eastern half provide for 200 homes and offices to deliver the remaining phases of the St James Place office quarter which is counted in the existing

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
				commitment. The allocated site is expected to deliver an uplift of an additional 100 homes
Land adjoining Sentinel House (St Catherine's Yard), Surrey Street	GNLP0451	0.38	Residential development (minimum <b>40 homes</b> or 200 student bedrooms)	Following the conversion of Sentinel House to 199 apartments it is no longer appropriate to allocate the entire site as initially proposed although land to the east remains suitable for development. This is acknowledged in adopted local plan allocation CC29, albeit that the majority of the Queens Road Car Park will not now be available and is excluded. An allocation for housing or student accommodation reflects a form of development already supported in principle on this site. As the proposed site is part of previous allocation, the figures are counted in the current commitment.
Land at and adjoining Anglia Square	GNLP0506	4.79	Residential-led mixed-use development including in the region of <b>1200 homes</b> , student accommodation, retail units, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities as part of a balanced mix.	Anglia Square is a strategically important long-term regeneration priority in the northern city centre (previously allocated in the Northern City Centre Area Action Plan) which has great potential as a catalyst for area wide regeneration and the delivery of a significant quantum of housing contributing to Norwich's allocation requirement, alongside major economic benefits for the city and Greater Norwich as a whole. Following resolution to approve a mixed-use regeneration scheme including 1250 homes and commercial floorspace (December 2018), the application has been called-in by the Secretary of State and will now be considered at a Public Inquiry. Notwithstanding the uncertainty over the current proposals, the strategic importance and major regeneration benefits of the site require appropriate



Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
				recognition in the GNLP. 198 units are counted in the existing commitment as part of an extant consent, the additional 1002 units are counted as uplift.
Land at and adjoining St Georges Works, Muspole Street	GNLP2114	0.57	Residential led mixed-use development (to provide a minimum of <b>110 homes</b> together with 5000sqm offices and managed workspace and potentially other ancillary uses such as small-scale retailing.)	The principle of development has been established through previous allocation of the site for housing development in the Northern City Centre Area Action Plan and a now expired planning permission for 57 homes. Consented office to residential conversion of the Guildyard, Colegate and Seymour House, Muspole Street could already deliver 60 flats counted in the existing commitment; the additional 50 units are counted as uplift. Outline regeneration proposals have been publicised alongside the nearby St Mary's Works site, for which there is a consented outline scheme, under the "Shoe Quarter" initiative. The building is currently used beneficially as managed workspace but in the event of more substantive development proposals the site can deliver a more substantial housing led development with significant regeneration benefits which should be acknowledged in the GNLP.
Sites at 84- 120 Ber Street, 147-153 Ber Street and Mariners Lane car park	GNLP2159	0.70	Residential development (a minimum of <b>150 homes</b> ). Office or other commercial uses at ground floor level would also be acceptable with scope for educational uses in association with the adjacent	147-153 Ber Street is already allocated in the adopted local plan for housing development (CC2). The entire site was previously identified in the 2004 local plan and subject to planning permission for a total of 151 residential units granted in March 2011 but not implemented. The principle of residential development is established. The site is considered to offer considerable regeneration benefits and could deliver a

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
			Notre Dame High School being provided on the south-west side of Ber Street.	significant quantum of housing including affordable housing and is thus suitable to identify in the GNLP. 20 Units are counted under existing commitment for CC2, 130 units are counted as new allocation.
Friars Quay car park, Colegate (former Wilson's Glassworks site)	GNLP2163	0.13	Residential development ( <b>25 homes</b> minimum). Offices or other commercial uses would be appropriate as a small element of the scheme on the frontage to Colegate.	The site was previously allocated in the Northern City Centre Area Action Plan for housing-led development and subject to a withdrawn planning application for residential development broadly similar to the GNLP submission. The principle of residential development has been established by virtue of the previous NCCAAP allocation and the development of the site (subject to detailed design) would offer regeneration benefits as well as contributing to the affordable and general needs housing requirement for the city. Accordingly it is suitable to identify in the GNLP.
Land West of Eastgate House, Thorpe Road	GNLP2164	0.19	Residential development (in the region of <b>20 homes</b> )	Eastgate House (former offices) adjoining has recently been converted to residential apartments mainly under prior approval as permitted development, Graphic House immediately to the west (also previously offices) has recently implemented its permission for conversion to a student large HMO. The site between these two buildings is of restricted size but could support appropriate residential development in association with the established newly converted residential accommodation adjoining. Given the surrounding pattern of uses it is considered that the site is appropriate to identify in the GNLP.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
Land at Carrow Works	GNLP3053	20.00	Residential led mixed-use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. <b>(1220 homes minimum)</b>	Carrow Works was formerly the location for Britvic Soft Drinks Ltd. And Unilever UK Ltd., and is being promoted for redevelopment. The allocation site, which also includes Carrow House owned by Norfolk County Council, is likely to accommodate at least 1200 homes contributing to an overall target of 2000 in the East Norwich strategic regeneration area. The site may also accommodate community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure.
St Mary's Works	GNLP3054	1.05	Comprehensive mixed-use development to include residential and employment uses, with the possible addition of a hotel. <b>(150 homes minimum)</b>	The site is situated in a prominent location within the Northern City Centre strategic regeneration area and is likely to accommodate a minimum of 150 homes. It benefits from existing outline consent for redevelopment including around 150 residential units, office floor space, and a hotel. 150 units have been counted as existing commitment.
<b>Total = 4,352 (New allocations 1,580; uplift on exiting commitment = 1,183; Commitment = 1,589)</b>				

## REASONABLE ALTERNATIVE SITES

Address	Site Reference	Area (ha)	Promoted for	Reason for not allocating
<b>Norwich</b>				
<b>Land east of King Street (King Street Stores &amp; Sports Hall site)</b>	GNLP0377	0.33	Residential development for a minimum of 40-50 dwellings with re provision of existing sports facility/centre	In the absence of evidence that the sports hall is surplus to requirements or any detailed information on how it might be replaced or re-provided allocation of the whole site would be premature and contrary to emerging policy. Existing allocation CC8 on the King Street Stores site only is suitable to carry forward in isolation and any future proposals to develop the sports hall could be progressed through a planning application.
<b>Norwich Airport Park &amp; Ride</b>	GNLP0381	3.40	Redevelopment of site for small scale retail/food store, hotel, business/office use or mixed-use development	There is no requirement for the development proposed and no basis for the release of the Park and Ride site pending decisions on its replacement and the form of the future Park and Ride network in the context of the ongoing Transport for Norwich strategy review. However, once these decisions are clarified the site would be appropriate for release.
<b>Site of Former Church, Heartsease Lane</b>	GNLP0570	2.44	Residential as an alternative to church redevelopment	Site was previously a private sports club and most recently a (now demolished) place of worship. Site could be appropriate for a carefully designed and integrated housing development although proposals for redevelopment as a church with no residential element have recently been approved. Given the uncertainty over whether any housing is likely to be deliverable, the site is a reasonable alternative but is not preferred for allocation at the current time.
<b>Land at Riverside</b>	GNLP2137	11.68	Mixed use development including residential offices, increased leisure and	A more permissive and flexible policy is being taken forward for the city centre as a whole which should allow for diversification of uses and intensification of development. This site is considered to be a reasonable alternative but in the absence of

			recreational activities, hotels and retail	further evidence on the precise form of development and the quantum of housing which might be deliverable a specific allocation is not considered appropriate at the current time.
<b>Sainsbury Homebase Site, Hall Road Retail Park</b>	GNLP3050	2.28	Residential	Development solely for residential purposes would result in an awkward and inappropriate relationship with neighbouring uses however site is considered to be a reasonable alternative to allow development potential to be assessed in the context of options for the retail park as whole but is not preferred for allocation. Current proposals to retain the retail use and subdivide the unit will mean that the site is now unlikely to come forward for alternative forms of development.

## UNREASONABLE SITES

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
<b>Norwich</b>				
293-297 Aylsham Road	GNL0117	1.20	Retail development including supermarket/ food store	The proposed foodstore has been implemented and is open for trading
UEA - University Drive North	GNL0133A	1.58	Additional Sport Park related development e.g. new sports pitches, car parking and ancillary uses	Development would be likely to have significant impacts on protected green space, green infrastructure and ecological networks.
UEA – Land west of Bluebell Road	GNL0133F	5.72	University related development e.g. teaching, research, accommodation, general infrastructure and ancillary uses	Development would be likely to have significant impacts on protected green space, green infrastructure and ecological networks.
The Alders, Cooper Lane	GNL0184	0.71	Residential (unspecified number)	Site proposed for limited housing development appropriate to its location in the Yare Valley and is too small to allocate individually. Has planning permission for a single dwelling
Henderson Community Park, Ivy Road	GNL0248 A&B	5.65	Residential and/or light industrial development for an undetermined number of dwellings or employment units	The site comprises open space forming part of an established community park serving residential areas in west Norwich. In the absence of any evidence to justify the loss of the green space there is no basis to release the site for housing. In addition, there is no evidence of need for additional employment allocations
10 Barnard Road	GNL0453	1.39	Approx. 2,400m <sup>2</sup> of floor space for convenience retail and approx. 1,400m <sup>2</sup> of floorspace for	This is an established indoor recreation facility within the Bowthorpe employment area. Proposals for hotel and replacement bowling alley previously refused and dismissed

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Promoted for</b>	<b>Reason considered to be unreasonable</b>
			restaurants and cafes	on appeal. No demonstrable need and capacity for the form of development proposed or any justification for the loss of the community recreation facility
Land to east of Spitfire Road and south of Anson Road	GNL0500	0.64	120-bedroom hotel with associated car parking and landscaping	Hotel proposal already approved and being implemented
Dowding Road	GNL0523	0.37	Residential development of up to 10 new dwellings	Site too small to meet the minimum allocation requirement and would involve the loss of protected open space
Wensum Lodge, 169 King Street	GNL01011	0.26	Allocation to protect continued use a community sports facility	<p>This proposal involves no substantive development and protection of individual community facilities is not a matter for the GNL0. Better considered in the context of a review of DM policies.</p> <p>Wensum Sports Hall site is not proposed to be allocated in the absence of evidence to demonstrate that the facility is surplus to requirements or a that a mechanism exists to replace or re-provide the sports facility elsewhere.</p>
Imperial Park (formerly site 4), Norwich Airport (Partly within Broadland – Horsham St Faith Parish)	GNL01061	46.50	General employment floorspace (B1c, B2, B8 and D1 with ancillary A1-A3 Use Classes)	The site falls within the operational area of Norwich Airport. Proposals for aviation related uses have been approved in outline but are not being progressed and this proposal seeks a reallocation for general employment use, which is also being pursued through a planning application. There is no evidence of need for new general employment allocations and the opportunity to deliver a major aviation related facility as consented would bring significant economic benefits

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Promoted for</b>	<b>Reason considered to be unreasonable</b>
Chapelfield	GNLP2077	3.66	Additional town centre uses including retail (A1), Leisure (D2) and food and drink (A3)	This proposal does not involve any substantive development but seeks a more flexible approach to the acceptance of uses in the shopping centre. More appropriate to consider in the context of the city centre policy and future review of DM policies.
Congregation Hall, UEA	GNLP2120	0.33	Conference Centre	As a redundant building within the existing designated UEA campus, proposals for a conference centre could be considered through the specific DM policy for the campus or any equivalent successor policy.
Adjoining Sainsbury Centre, UEA	GNLP2123	1.60	University related development possibly expansion of Sainsbury Centre	Development would be likely to have significant impacts on protected green space, green infrastructure and ecological networks.



## PART 2 – SUMMARY OF COMMENTS FROM THE REGULATION 18C DRAFT PLAN CONSULTATION

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0068 Land adjacent to the River Wensum and the Premier Inn, Duke Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	As a neighbour I support the redevelopment of this effectively scrap land. I would like to see an extension of the riverside walk through the site with a connection to St Georges St.	Support for development of Brownfield site & provision of riverside walk	noted	no change
Historic England	Object	This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including Blackfriars Bridge and 52 Colgate, both listed at grade II. Redevelopment of the site	Broadly supportive of principle of development  Suggested wording for heritage assets	Suggested wording relating to Heritage welcomed & to be included in policy wording.	Heritage policy wording amended in accordance with representation suggestion

		<p>therefore has the potential to affect these heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site.</p> <p>We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 2. However, there is no mention of the Conservation Area in the policy or supporting text and whilst bullet point 3 mentions the need to conserve and enhance adjoining heritage assets, the Conservation Area is not adjoining (the site lies within it) and other assets are not adjoining but nearby. Therefore, we suggest amending the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings (including any contribution made to their significance by setting).</p> <p>We welcome the commitment to riverside access for walking and cycling in bullet point 5.</p> <p>We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change:</p>	<p>support for riverside walk</p> <p>concern relating to density and potential impact on heritage assets</p>	<p>Riverside walk support welcomed</p>	<p>No change to riverside walk</p>
--	--	---	--	--	------------------------------------

		Amend the policy wording to read Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings (including any contribution made to their significance by setting).			
Anglian Water Services Ltd.	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p> <p>There is also a surface water discharge point located within the boundary of the site which should be referred to as part of the site specific requirements.</p>	<p>Welcome water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies .</p> <p>Additional wording required in policy to refer to a surface water discharge point on boundary of site.</p>	<p>Noted. This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p> <p>Surface water discharge point to be referenced in policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.</p> <p>Add reference to surface water discharge point in policy.</p>
Environment Agency (Eastern Region)	Comment	We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.	<p>SuDs need to be addressed in policy – in relation to riverside location &amp; provide improvements to habitat.</p> <p>Site located in present day flood zone 2, but climate change zone 3a – this must be</p>	<p>Additional information welcomed. Flood resilience mentioned in policy, suggest early engagement with EA in supporting notes</p>	<p>Supporting notes updated to recommend early engagement with EA</p>

		<p>This site allocation lies in present day Flood Zone 2, but once climate change is added to the flood levels, the entire site lies in Flood Zone 3a High Probability. Therefore the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage, which may be difficult to achieve, as the entire site is within Future Flood Zone 3a. However we note that there is an extant permission on the site, and that the development has been designed not to impede water flow, and allow flood storage across the ground floor levels.</p>	<p>reflected in design of development.</p> <p>Recognition of existing permission on site &amp; how this addresses flood issues.</p>		
--	--	---	---	--	--

Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Could it make the most of its riverside location?</li> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word 'should' seems to weaken the requirement. CC4b for example does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Bullet point 5 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme expected to provide the walkway/cycleway and to what standard?</li> </ul>	<p>Ambiguous wording to affordable housing policy.</p> <p>Clarification required relating to riverside walk wording</p> <p>Potential for enhancement to riverside location</p>	<p>Comments relating to Affordable housing accepted</p> <p>Riverside walk wording strengthened &amp; reference to be made to River Wensum Strategy for standard.</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Riverside walk wording amended</p>
------------------	---------	---	--	--	--

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-B Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery), Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	4
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for UEA	Support	<p>On behalf of UEA - Strong support for preferred allocation.</p> <p>The site is entirely deliverable &amp; capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Site area should be revised to match UEA DFS (1.06ha)</p> <p>Principle of development established: Existing allocation R39 &amp; previous outline consent (now lapsed)</p>	<p>Site area &amp; suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>Noted,</p> <p>Policy wording and site boundary to be reviewed</p> <p>Await updates from Historic England review</p>	<p>Site boundary revised in accordance with rep, map revised.</p> <p>Reference made to HE historic parks and gardens designation of Earlham Park</p> <p>Policy text revised in accordance with rep.</p>

		<p>Site is deliverable in accordance with NPPF definition: the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site, and is viable (detail provided in rep).</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording.</p> <ul style="list-style-type: none"> <li>• Site area – revise 1.38ha to 1.06ha</li> <li>• Achievement of a locally distinctive high quality, low carbon, energy and water and energy efficient exemplar development of exceptional quality which respects its historic context.</li> </ul>			
Member of public	Object	<p>I object to further building works in an area that was previously accessible as a thoroughfare from the southern fields to the northern fields, passing through the gardens and by the old walled gardens. These building works seem to prevent</p>	<p>Objection to potential loss of public access to areas disuse of the old estate/gardens.</p>	Noted	<p>This is the residue of an existing allocation and previously consented site, the principle of</p>

		public access more and more and will lead to a disuse of the walled gardens and the old estate gardens.			development is accepted. No change.
Historic England	Object	<p>Earlham Hall is listed at Grade II* with the garden walls and dovecote listed at grade II. The whole site lies within the Earlham Conservation Area. Any development of this site has the potential to impact upon the heritage assets and their settings.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We note bullet point 2 relating to the need to protect and enhance the significance of heritage assets including Earlham Hall and Earlham Conservation Area. It would be helpful to state that Earlham Hall is listed at Grade II* and that there are other grade II listed buildings/structures.</p> <p>Suggested Change:  Reword bullet point 2 to read  Development should protect and enhance the significance of the grade II* Earlham Hall and associated Grade II listed buildings and the Earlham Conservation Area (including any contribution made to that significance by setting), through careful design, massing and appropriate open space and landscaping.</p>	<p>Insufficient reference to heritage assets &amp; mitigation/design.</p> <p>Recommend preparation of a more detailed Historic Impact Assessment (HIA)</p>	<p>Need for strengthened heritage asset wording accepted.</p> <p>The UEA has a number of evidence documents endorsed by Norwich City Council. Principle of development accepted due to existing allocation &amp; previous consents on site. HIA requirements not added to policy.</p>	<p>Amend policy wording to recognise importance of heritage assets.</p>



Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient exemplar development. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome reference to water efficient exemplar development - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted. .
-----------------------------	---------	--	--	--	--

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-C Land north of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House, University of East Anglia) Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for UEA	Support	<p>Strong support for preferred allocation</p> <p>Principle of development established through existing allocation &amp; extant planning consent.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (Details/evidence contained within representation)</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>The outcome of Historic England's review was not to designate the parkland – no reference required</p> <p>Affordable housing dealt with in strategy, no longer referenced/duplicated in site specific policies.</p>	Allocate with revisions to policy wording

		<p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revisions to policy wording:</p> <ul style="list-style-type: none"> <li>• Omit: ."and is to provide affordable housing in accordance with policy 5, subject to viability considerations" from bold text.</li> <li>• Omit '<i>locally distinctive</i>' from bullet point 2</li> <li>• Amend final bullet point to: '<i>Access arrangements to the site will be in accordance with the approved planning permission, unless otherwise agreed with the <u>Local Planning Authority in consultation with the Local Highway Authority</u></i>'</li> </ul>		<p>No benefit to omitting locally distinctive wording</p> <p>Highways access wording accepted</p>	
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Absence of water efficiency wording in policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No Change</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-D Land between Suffolk Walk and Bluebell Road, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 3 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for UEA	Support	<p>Strong support for the preferred allocation, the site is entirely deliverable, and capable of making a significant contribution towards facilitating the UEA's forecasted student growth, and expansion of its estate, up to 2038.</p> <p>Part of GNLP0133-D (2.85 ha) is allocated in the Adopted Development Plan, as a strategic reserve (Policy R41), and is identified in the 2010 DFS. Policy R41 allocated the site on the basis of it only being released for development following</p>	<p>suggested amendments to policy wording and site area</p> <p>Historic England Historic Parkland review</p>	<p>The outcome of Historic England's review was not to designate the parkland. – no reference required. Site are error accepted – revision required.</p> <p>Amendments to wording of bullet 2 recognised – amendments to be made with</p>	<p>Site boundary revised to reflect the site proposed in DFS 2019</p> <p>Bullet 2 wording revised.</p>

		<p>the development of the Blackdale School site and Earlham Hall site. It should be noted that the Blackdale School site is consented, and part developed, for student accommodation. The Earlham Hall site has been under development, with the remainder of Earlham Hall identified by Area 1 of the DFS (2019). Consequently, GNLP0133-D has now been identified as a preferred allocation due to the principle of development being established by virtue of the existing Adopted Development Plan allocation (R41), and the need arising, as identified within the DFS (2019).</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. (detail provided in representation)</p>		reference to other representations.	
--	--	---	--	-------------------------------------	--

		<p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p> <p>Suggested revision to policy wording:</p> <ul style="list-style-type: none"> <li>• Site size 3.93ha not 2.74ha</li> <li>• Omit 'locally distinctive' from bullet point 1</li> <li>• Amend bullet point 2 to read:  <i>"Development should take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of "The Prospect" and respect the heritage significance and setting of the listed buildings within this part of the campus, balanced against having regard to Lasdun's original architectural vision which must be a material consideration in its design"</i></li> </ul>			
Historic England	Object	There are no designated heritage assets within the site boundary but the Earlham Park Conservation lies to the north of the site and the campus includes a number of listed buildings including the grade II* Sainsbury Centre and Norfolk and Suffolk Terraces,	<p>Amend policy wording to reference proximity to heritage assets.</p> <p>Suggested production of a detailed Historic Impact Assessment</p>	HIA not considered necessary, UEA has a suite of documents agreed with Norwich City	Policy wording to be reviewed and amended referncing heritage assets.

		<p>together with a number of other grade II listed buildings. Any development of this site therefore has the potential to impact upon the settings of these designated heritage assets.</p> <p>We suggest that a more detailed HIA be prepared for the campus as a whole. We welcome bullet point 2 regarding the heritage significance and setting of buildings within the campus and also the sensitive location adjacent to the University Broad. Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.</p> <p>Suggested Change: Amend policy wording in accordance with the advice above. Prepare a more detailed HIA for the campus as a whole.</p>	<p>(HIA) for whole campus</p> <p>Careful design will be needed of any development to ensure the protection and enhancement of nearby heritage assets.</p>	<p>Council to form evidence base.</p> <p>Wording relating to heritage assets accepted, policy to be revised</p>	
Member of public	Object	<p>I would like to object to the prospect of future development and expansion by the UEA on this piece of land. It is a green open space that should be preserved in its current form for the unrestricted use of the general public. Importantly, this landscape plays an important role in supporting wildlife, while it is also enjoyed daily by its countless visitors, staff and students. In fact, part of the reason for selecting the</p>	<p>Loss of green open space.</p> <p>Loss of public access</p> <p>Impacts on biodiversity &amp; wellbeing</p>	<p>The University campus is considered the most appropriate location for university based development. The proposed site largely consists of the existing 'strategic reserve'.</p>	No change.

		UEA for study or employment is this natural environment. Any development would lead to a degradation of this location.		The policy wording already addresses improved public access & biodiversity enhancements in the requirements.	
Member of public	Object	<p>Object to this massive development which will destroy a large chunk of greenbelt land, including trees that contain a diversity of nesting birdlife. Losing more of the green corridor will put pressure on wildlife and the amenities the people of Norwich can enjoy in this area.</p> <p>400 student increase will also put pressure on local amenities such as Eaton Park and the Yare Valley, as well as local shops and bus services. And will also see an increase in traffic along Bluebell Road, thereby increasing carbon emissions while destroying precious woodland.</p>	<p>Loss of green open space.</p> <p>Impacts on biodiversity, climate &amp; wellbeing</p> <p>Impact on local amenities</p>	The University campus is considered the most appropriate location for university based development. The proposed site largely consists of the existing 'strategic reserve'. The policy wording already addresses improved public access & biodiversity enhancements in the requirements	No change
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this university related development.</p> <p>There is also no reference made to existing foul and surface water sewers</p>	<p>Absence of reference to water efficient design</p> <p>No reference to existing drainage infrastructure &amp; how</p>	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Policy wording to be reviewed, details of existing drainage to be clarified & addressed in policy.



		being considered as part of the site layout and design in the site specific requirements.	they will be addressed as part of the site layout and design in the site specific requirements.	Reference to existing Foul & Surface water sewers welcomed	No change regarding Water efficiency Foul & Surface water sewers to be referenced in policy
Member of public	Comment	<p>I am an advocate for preserving the landscape and environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I am informed that previous permission has been given to the UEA for student accommodation within the UEA park the lakeside of the accommodation road from North Park Avenue. This requires the removal of an established belt of trees which hides the stark reality of 1960s architecture of existing UEA accommodation.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation</p>	<p>Impacts of flood risk &amp; climate change</p> <p>Loss of biodiversity &amp; natural screening</p> <p>Object to further student accommodation being provided on campus due to developments in the city centre.</p>	<p>Landscape issues addressed in existing site allocation policies and strategy.</p> <p>The UEA campus is appropriate location for university-based development. The proposed site largely consists of the existing 'strategic reserve'. Growth plans are evidenced in the DFS 2019</p>	No change

		is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation			
--	--	--	--	--	--

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0133-E Land at the UEA Grounds Depot Site, Bluebell Road, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	20
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 16 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for UEA	Support	<p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of development being delivered on the site within the plan period, and is viable. Detail is provided within the representation</p> <p>Historic England are reviewing the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188) which may have implications for the UEA's growth plans.</p>	<p>suggested policy wording</p> <p>Historic England Historic Parkland review</p>	<p>Affordable Housing addressed in strategic policy 5, not repeated in site specific policies</p> <p>The outcome of Historic England's review was not to designate the parkland. – no reference required.</p>	<p>Affordable housing addressed in strategic policy 5</p> <p>No reference to HE parkland review necessary</p> <p>Disabled parking provision added to policy wording</p> <p>No change to scale of development</p>

		<p>The preferred allocation outlines that development on the site should provide affordable housing. However, it is sought to delete this requirement from the preferred allocation's wording. This is due to the fact that Policy 5 of the draft GNLP recognises that the development of purpose built student accommodation within the UEA Campus does not need to provide affordable housing (whereas, development outside of the UEA Campus does).</p> <p>Changes suggested to policy wording relating to affordable housing contributions, landscaping and provision of disabled parking spaces.</p>		<p>Disabled parking facility comment accepted</p> <p>Due to landscape concerns raised by objectors to this site, flexibility of scale not considered appropriate</p>	
Yare Valley Society	Object	<p>Damaging intrusion into Yare Valley Character Area breaking its natural line, and narrowing an important green infrastructure corridor.</p> <p>Impacts adversely on the Valley Green Infrastructure Corridor ability to fulfil key roles of maintaining biodiversity, mitigating climate change, and supporting population well-being.</p> <p>Reduces a green infrastructure that needs to be increased to meet growing population demands.</p> <p>Contrary to Norwich Local Plan Policy DM6 seeking to protect the Yare Valley</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p>	see summary below table	Any change to plan?

		<p>Character Area from building development of this kind.          Contrary to Policies of “The Strategy” in the draft GNLP (e.g. policies 3, and 7.1) seeking to conserve and enhance the green infrastructure.</p> <p>The inclusion of the site suggests that Greater Norwich is not serious about implementing its declared green infrastructure policy.</p>	Allocation is contrary to local and strategic policies.		
Norwich Liberal Democrats	Object	<p>The site is seen by the public as being outside of the Campus, with a footpath dividing the developed area of the campus from the non-developed area of the Yare Valley. It is a prominent and sensitive river valley location and lying at a lower level than Bluebell Road any development such as a 5 or 6 storey student accommodation block would be very visible and intrusive in the landscape if developed towards the road end of the site as the lower end towards the river would be liable to flooding. We believe it should remain in its current use as a depot and greenhouses with its relatively minor intrusion in the landscape.</p>	<p>Site is viewed as separate from UEA campus</p> <p>Development of scale would be very visible &amp; intrusive in the landscape.</p> <p>Retain current use</p>	<p>see summary below table</p> <p>Scale of development restricted to 2-3 storey by policy</p> <p>The proposed site is outside of the defined UEA campus boundary, however is owned and in use by the UEA. The site is in an appropriate, well connected location for university-based development.          Growth plans are</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>

				evidenced in the DFS 2019	
Member of public	Object	<p>If building development were to take place on this site it would be a serious intrusion into the Yare Valley greenspace, and a threat to the integrity of the Yare Valley in the performance of its green infrastructure roles. It would further increase pressure on the existing green infrastructure which is already under considerable pressure. Such development would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. It would be a clear signal to developers, and the public that Greater Norwich is not prepared to stand by its green infrastructure commitments.</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	<p>I am of the strong opinion that this site should absolutely not be used for any student accommodation development whatsoever. Several locations have in recent years been selected and built on in Norwich for this purpose.</p> <p>The closeness of the protected Yare Valley landscape means that any proposed development would be detrimental to this space, irrespective of suggested planting and biodiversity enhancements. Housing for 400(!)</p>	<p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p> <p>Proximity to Yare Valley will have negative impacts on ecosystem.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		students will have a certain negative impact on the local ecosystem. Urban sprawl in this location should be prohibited for the sake of retaining a public open space and recreation area.	Urban sprawl should be prevented.		
Member of public	Object	<p>This proposal should be rejected on the same grounds that the adjacent GNLP0133F was rejected, that "it is likely to have significant impacts on protected green space, green infrastructure and ecological networks".</p> <p>Moreover, the HELAA comparison table gives the rejected GNLP0133F more 'green' and fewer 'amber' judgements than this site which currently contains a few single storey buildings well hidden behind mature trees and hedges.</p> <p>This proposal would significantly encroach on the green corridor linking the Yare valley with Bluebell Woods and Eaton Park and is contrary to the Strategy principle (para 185) "of enhancing habitats and green infrastructure'.</p>	<p>Site should be rejected on same grounds as adjacent unreasonable site GNLP0133F</p> <p>Proposed allocation is not supported by HELAA conclusions.</p> <p>Negative impacts on green infrastructure</p> <p>Contrary to proposed strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	I strenuously object to building development on this site (GNLP0133-E) as this would be a grievous intrusion into the Yare Valley green space and the existing wildlife would most certainly be compromised. Development of this	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus

		<p>space would be completely contrary to the stated aims of the Norwich Development Management Policy and the draft GNLP Strategy. Greater Norwich must be prepared to stand by its green infrastructure commitments and saying NO to this development would be a clear signal to developers.</p> <p>I am requesting that the site be withdrawn from the list of sites for development.</p>	<p>climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		<p>have been delivered</p>
Member of public	Object	<p>I endorse the arguments of the Yare Valley Society. As a long-term resident in the area, and ex UEA student and staff member, I support the need to preserve the Yare Valley as an amenity providing a healthy environment for humans and wildlife. No more buildings please.</p>	<p>See Yare Valley Society</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>
Member of public	Object	<p>I strongly oppose on these grounds:-</p> <ol style="list-style-type: none"> <li>1. Destruction of natural habit and green spaces which is at odds with environmental protection and attempts to combat climate change</li> <li>2. Opening door to further linear development beside Bluebell Road - taking all green space</li> <li>3. Not convinced of the economic case for yet more student accommodation in Norwich - a classic boom and bust is</li> </ol>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>



		likely which would then be too late for the amenity would be lost.	<p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p>		
Member of public	Object	<p>I wish to oppose the proposal to construct a substantial student residences building on this site. My grounds are as follows:</p> <p>(1) A very large number of student residences have recently been built or are being constructed by private developers in the City.</p> <p>(2) Building in this location, within the Yare Valley Character Area, would further erode this valuable green corridor and in doing so would be contrary to the Norwich city development policy. The valley at this particular location is narrow and especially vulnerable.</p> <p>(3) The declared strategy in the draft GNLP states an intention to extend and</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		enhance the green infrastructure of the area. This proposed building would have precisely the opposite effect.	Opposition to proposed use for Student Accommodation due to number of recent developments within the city.		
Member of public	Object	I wish to object to the above plan as the Yare Valley is an area of beauty that needs to be protected for future generations and this development will seriously detract from the character of the local environment	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.  Green Infrastructure needs to be increased, not reduced.	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered
Member of public	Object	UEA has already caused significant damage to the Yare valley and any further building on site should be stopped.  This proposal spreads the area of damage further south along Bluebell Road.  The Yare Valley is already over-used in this area, with paths becoming	Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being.	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		<p>increasingly wide, more and more buildings and the construction of concrete and tarred paths in what was once a beautiful green space. Building yet more student accommodation here will add to the already significant pressure on the river valley. It will also be visually intrusive.</p> <p>Any further reduction in green spaces in the Yare Valley Character Area will have a significant impact on its ability to function effectively in its roles of maintaining biodiversity, mitigating climate change, and supporting informal leisure. We need more, not less, green space.</p> <p>Several Policies in “The Strategy” of the draft GNLP emphasise the importance of green infrastructure, and the intention to extend and enhance it. But the inclusion of the site in the draft GNLP contradicts these stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</p>	<p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		
Member of public	Object	<ul style="list-style-type: none"> <li>The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function effectively in its roles of</li> </ul>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites</p>

		<p>maintaining biodiversity, mitigating climate change, and supporting informal leisure.</p> <ul style="list-style-type: none"> <li>• The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it.</li> <li>• The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind.</li> <li>• Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts the stated intention and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</li> </ul>	<p>biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>		<p>within campus have been delivered</p>
Member of public	Object	This proposal is a direct invasion of the green corridor of the Yare Valley which	Damaging intrusion into Yare Valley which	see summary below table	Site proposed to be strategic

		<p>has been long valued as a green infrastructure corridor, supporting informal leisure and maintaining biodiversity. This inclusion by UEA is a test of the integrity of the Council to stand by its words on green infrastructure.</p> <p>The Yare Valley is a precious resource which is being squeezed from all sides, due to inappropriate development. We should be looking to increase green space for the future wellbeing of people and the planet.</p> <p>The new housing in the area of Colney and Cringleford will put great pressure on the valley without the creeping invasion of UEA along the Bluebell lane.</p> <p>Please have the courage and integrity to tell the UEA to plant trees instead!</p>	<p>impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p> <p>Suggest tree planting as preferable alternative to development</p>		<p>reserve, developed only once other sites within campus have been delivered</p>
Member of public	Object	<p>The proposed site will impact negatively on the Broad, destroying wildlife habitats and causing noise and light pollution. At present the area is used extensively by local residents and students</p>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p>	<p>see summary below table</p>	<p>Site proposed to be strategic reserve, developed only once other sites within campus have been delivered</p>

			Green Infrastructure needs to be increased, not reduced.		
Member of public	Object	<p>I wish to object in the strongest terms to the inclusion of this site for the development of student accommodation. The site is part of the Yare Valley, which is supposed to be protected already under the Norwich Development Management Policy, and under the GNLP policies exist to extend and enhance green infrastructure and underline its importance. This proposal is directly contrary to such policies.</p> <p>Any such development would be a major and damaging intrusion into the Yare Valley and would reduce and put further pressure onto an already limited area which currently serves to provide leisure space, biodiversity, and climate benefits in an increasingly urban area.</p> <p>Please do not approve this proposal.</p> <p>some thoughts about the impact of the development:</p> <ul style="list-style-type: none"> <li>• The Yare Valley Character Area is more than the sum of its parts. Any reduction in the Valley green infrastructure corridor impacts on its ability to function effectively in its roles of</li> </ul>	<p>Damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Green Infrastructure needs to be increased, not reduced.</p> <p>Allocation is contrary to local and strategic policies.</p>	see summary below table	Site proposed to be strategic reserve, developed only once other sites within campus have been delivered

		<p>maintaining biodiversity, mitigating climate change, and supporting informal leisure.</p> <ul style="list-style-type: none"> <li>• The Yare Valley Character Area is already under pressure from existing leisure activity overuse (e.g. over-worn paths). In the future it will have to meet the well-being needs of an additional population from new nearby residential development currently under construction. Now is the time to increase the Yare Valley green space, not to reduce it.</li> <li>• The intrusion of building development into the Yare Valley Character Area would be contrary to existing (and continuing) Norwich Development Management Policy which seeks to safeguard the Yare Valley Character Area from building development of this kind.</li> <li>• Several of the Policies of “The Strategy” of the draft GNLP emphasize the importance of green infrastructure, and the intention to extend and enhance it. The inclusion of the site in the draft GNLP contradicts stated intentions and would signal that Greater Norwich is not serious about implementing its own declared green infrastructure policies.</li> </ul>			
Member of public	Object	First and foremost I am an advocate for preserving the landscape and	Damaging intrusion into Yare Valley which	see summary below table	Site proposed to be strategic

		<p>environment of the Yare Valley. My views are endorsed by the fact that recent high river flows have seen extensive flooding of the Yare Flood Plain. This can only be further exacerbated by climate change and further development within the River Yare catchment. The conservation measures to safeguard wildlife is also imperative for this area.</p> <p>I object to the proposal of further student accommodation proposed at this site. This is influenced by the fact that substantial student accommodation is being provided within the city centre regeneration plan. i.e. former Norwich Union office accommodation.</p>	<p>impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change &amp; supporting population well-being.</p> <p>Opposition to proposed use for Student Accommodation due to number of recent developments within the city.</p>		<p>reserve, developed only once other sites within campus have been delivered</p>
<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation development.</p> <p>There is also no reference made to existing surface water sewer being considered as part of the site layout and design in the site specific requirements.</p>	<p>Absence of water efficient design</p> <p>Needs to reference existing sewer provisions within site that must be addressed.</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy Information regarding existing surface water sewers on site &amp; regard needed to be given to them is welcomed.</p>	<p>No change regarding water efficient design</p> <p>Reference to existing sewer provision on site referenced in policy</p>



Environment Agency (Eastern Region)	Comment	The very south west of the site allocation, adjacent to the Broad, is in Flood Zones 2 and 3, both now and in the future with climate change. As this is only a very small part of the site then all built development must be sequentially sited outside of the flood zones in Future Flood Zone 1.	Area of site is within flood zones 2 & 3. Development must be sequentially located to flood zone 1 area of site	Comments welcomed, policy wording to be updated to reflect this	Development to be sequentially located to flood zone 1 area of site.
Historic England	Comment	Welcome bullet point 1 in relation to heritage assets.	No issues requiring investigation	noted	no change

### Summary:

A number of representations have been submitted in objection (or strong objection) to the proposed allocation of this site. The key areas of concern raised relate to proposed development within the Yare Valley which is considered to be a damaging intrusion into Yare Valley which impacts on the ability to fulfil key roles of maintaining biodiversity, mitigating climate change & supporting population well-being. Strategic policies within the plan call for improvements and increased provision of Green Infrastructure throughout the plan area, the proposed allocation of this site supports the growth plans of the UEA over the plan period. The policy calls for a low impact development with requirements for high quality landscaping, planting and biodiversity requirements. Development will be sequentially located outside of areas of the site subject to flood risk and promotes pedestrian and cycle access through the site.

Objection has also been raised concerning additional student accommodation in this location, development of student accommodation is addressed in Norwich City Council's PBSA evidence and best practice advice note 2019 which concludes that evidence suggests that there is potential for well design, well located, and appropriately priced PBSA to meet the needs of a greater student population than at present.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0282 Land at Constitution Motors, 140-142 Constitution Hill, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 0 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Historic England	Support	Welcome bullet point 1 and reference to locally listed building.	None	Noted	No change
Anglian Water Services Ltd.	Comment	Unlike other housing allocation policies there is no reference to water efficiency forming part of the design.	Absence of reference to water efficiency in design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0360 Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	9
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 2 Object, 6 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>The Deal Ground offers the opportunity for Norwich to have a vibrant gateway to the Norfolk and Suffolk Broads National Park.</p> <p>The southern rivers of the network have the potential for greater use for tourism, supporting jobs and local economies from Norwich and as far as Beccles. Broom recently ceased boat building just down the river in Brundall.</p> <p>The yacht station on Riverside road is adequate but not a particularly appealing place to be resident for one or more nights. There is opportunity for visitor</p>	Potential for boat/broads related uses, visitor and private moorings	Support welcomed	No change

		moorings, properties with private moorings and commercial facilities with a focus on the boating community.			
Member of public	Object	Any development of this site will need another road connection not just Bracondale as it's already very busy. Ideally a road link should be built to the Harvey Lane traffic lights, this will provide the necessary additional road link to the site and will reduce congestion on Koblenz Avenue.	Transport related issues relating to inadequacy of existing infrastructure to accommodate scale of development.	Transport and highways issues are recognised and are to be dealt with in the emerging masterplan for East Norwich regeneration area.	Additional bullet point in policy requiring delivery of co-ordinated transport infrastructure
Historic England	Object	This large cross boundary site for 680 dwellings includes a grade II listed bottle kiln and the southern portion of the site lies within the Trowse Millgate Conservation Area. Any redevelopment of this site has the potential to affect these designated heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site. There is currently no reference to these designated heritages assets within the policy or supporting text. To that end, we recommend that reference is made both in the policy and the supporting text to the need to Conserve and where appropriate enhance significance of the grade II listed bottle Kiln and Trowse Millgate Conservation Area (including	Reference needs to be made to heritage assets  Concern regarding scale of development impacting heritage assets including long views  Suggested Change: Amend policy and supporting text to reference the designated heritage assets and the need to Conserve and where appropriate enhance significance of the grade II listed bottle	Absence of reference to heritage assets noted – policy wording to be reviewed and updated to include references.  Wording to address scale and form of development to be considered in policy wording	Additional bullet points added to policy to address heritage

		<p>any contribution made to that significance by setting).  While there may be no designated heritage assets in northern most part of the site, any tall structures have the potential to impact on longer views (especially from higher ground) in towards the historic city core (including the castle and cathedral). Although there are no designated heritage assets along this stretch of river bank, this part of the site has a significant potential for archaeology. This should be referenced in the policy</p>	<p>Kiln and Trowse Millgate Conservation Area (including any contribution made to that significance by setting)</p>		
<p>Mr David Maddox  for site owner</p>	<p>Comment</p>	<p>Map 9 should include all land within allocation GNLP0360. The masterplan should not be restricted to the production of supplementary planning guidance but seek a coordinated master planning process in collaboration with the Councils. GNLP0360 has the potential to deliver significantly more than 680 new homes and until a masterplan has been completed policy 7.1 should refer to a minimum figure to deliver more than 2,000 new homes. The plan should allow for flexibility on the level of affordable housing to be provided in the Growth Area informed by viability testing of the masterplan and accompanied by an infrastructure funding statement.</p>	<p>Allocation area is unclear on Map 9 &amp; should include all land within allocation GNLP0360</p> <p>This site along with the associated sites in East Norwich Regeneration area have potential to deliver a higher quantum of housing than draft policy allocates.</p> <p>Masterplan should be coordinated with the</p>	<p>Important issues have been raised here which will need to be considered alongside other representations received relating to this site and in association with the East Norwich Regeneration area.</p> <p>Viability issues relating to Affordable Housing</p>	<p>Map 9 to be updated to include all land in GNLP0360</p> <p>Density &amp; deliverability to be explored through comprehensive master planning process required in policy.</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in</p>

			<p>councils and be sufficiently flexible to change</p> <p>Affordable housing should be calculated on evidence based viability, not blanket 33%</p> <p>The representation includes recommended changes to policy wording</p>	<p>expectations noted and to be reviewed.</p>	<p>site specific policies.</p>
Tarmac Limited	Comment	<p>Tarmac Limited operate, and have for many years, a rail connected asphalt and aggregates transshipment operation within the heart of GNLP0360 and note the proposed development aspirations on adjoining land. Whilst it is noted that the land immediately adjoining our site is designated for Employment Use it is acknowledged that residential development is proposed to the east of the employment land. Proposals for such uses need to ensure that they will not place any constraints on the operation of our site which is recognised within the Norfolk Minerals Local Plan as a safeguarded rail depot.</p>	<p>Proposed allocation / development should not jeopardise the functioning of the existing, well established employment use on the site.</p>	<p>Comments noted, the policy seeks exploration for opportunities to relocate this facility to maximise developable area of this site. If relocation is not considered possible as part of this process; the functioning of this facility should not be inhibited.</p>	<p>Additional requirement added to address railhead and minerals and waste policy requirements</p>

Anglian Water Services Ltd	Comment	Unlike other allocation policies there is no reference to water efficiency forming part of the design.	Absence of water efficient design from policy. - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change
Norfolk Wildlife Trust	Comment	we recommend that specific wording is included in the allocation policies to ensure they are properly addressed at the planning application stage. Any applications in proximity to known wildlife sites (as set out in Table 4), as well as irreplaceable habitats such as ancient woodland, and priority habitats (as set out in the NERC Act 2016) should be accompanied by an ecological appraisal, with provision of biodiversity net gain and sufficient buffering and safeguarding space secured between the development and the wildlife site in perpetuity (potentially also delivering contributions to green infrastructure). GNLP0360 – this allocation partially overlaps with Carrow Abbey CWS. The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording	Policy wording needs to be strengthened relating to wildlife considerations.  The ecological conditions set out in the 2013 outline planning permission (planning reference 12/00875/O) should be included in the policy wording	Policy wording to be reviewed and amended as necessary.	Policy wording updated to reference county wildlife site, green infrastructure already addressed in policy

		We strongly recommend the inclusion of a mandatory requirement for development to include green design features such as green roofs, walls and sustainable drainage.			
Environment Agency (Eastern Region)	Comment	<p>Site adjacent to river – needs to ensure SuDS within the development are sufficient to protect the water quality of the River Wensum and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>The majority of the May Gurney and Deal Ground Site (GNLP0360) is within the flood plain of the River Yare, any development of the floodplain would compromise the natural functioning of the river and the WFD no deterioration objective. There should be a significant buffer between the development and the flood plain. We are working with Norwich City Council on the Yare Valley Parkway green infrastructure corridor, to ensure that the River Yare around the south of Norwich is as good as it can be and to enhance the conservation value of the nature sites along the corridor. Any sensitive development of sections of this</p>	<p>Design of SuDS appropriate to protect water quality &amp; habitat of river Wensum</p> <p>Risks of flooding requires sequential test &amp; specialist design to proposed development on site. Measures proposed in approved application 12/00875/O may no longer be sufficient to address changes through revised climate change levels</p>	Additional detail welcomed	Policy wording and notes updated



		<p>land parcel outside of the flood plain should also restore natural habitats within the flood plain.</p> <p>As stated above, the majority of the site lies in Flood Zones 2 and 3, both now and with the addition of climate change. A significant majority of Flood Zone 3 is shown on our modelling to actually be Flood Zone 3b Functional Floodplain, with an annual probability of flooding of 5% (1 in 20) and classed as 'land where water needs to flow and be stored in times of flood'. Residential and commercial development, classed as 'more vulnerable' and 'less vulnerable' development respectively, is not permitted in Flood Zone 3b so the majority of the site will need to be left undeveloped.</p> <p>As with all development in Flood Zones, the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built</p>			
--	--	--	--	--	--

		<p>development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage.</p> <p>We note that there is an extant outline permission on the site, which met these requirements, although climate change allowances have since changed so the required floor levels may be different. This should be addressed as part of the reserved matters applications.</p>			
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Could it make the most of its riverside location?</li> <li>• Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well?</li> <li>• Is the scheme expected to provide the walkway/cycleway and to what standard?</li> </ul>	<p>Affordable housing policy wording needs strengthening/review</p> <p>Potential to enhance riverside location</p> <p>Clarification relating to development of associated sites in East Norwich Regeneration area.</p> <p>More detailed required relating to walkway/cycleway</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Need for clarity relating to reference to R10 Utilities site accepted</p> <p>Comments regarding Heritage assets accepted</p>	<p>Affordable housing no longer addressed in site specific policies</p> <p>Included reference to R10</p> <p>Heritage assets addressed</p>

		<ul style="list-style-type: none"> <li>• There appears to be no mention of protecting and enhancing designated / non-designated heritage assets. There is a listed lime kiln on the site and I think potentially some locally identified HAs.</li> </ul>	Absence of reference to heritage assets requires review	Riverside walk detail to be addressed	
--	--	--	---	---------------------------------------	--

**FOOTNOTE**

Please note that individual policies GNLP0360 (The Deal Ground), GNLP3053 (Carrow Works), and R10 (Utilities site) have now been combined into a single East Norwich Strategic Regeneration area strategic policy reference: GNLP0360/3053/R10

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0401 Former Eastern Electricity Headquarters, (Duke's Wharf) Duke Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for Highcourt Developments Ltd	Support	<p>Support for mixed use redevelopment Site is capable of accommodating a minimum of 100 homes (or at min 250 bed student accommodation) + a range of other uses to provide a balanced mix.</p> <p>In accordance with the National Planning Policy Framework's (NPPF) definition of 'deliverable', the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. (Further detail provided in rep.)</p>	<p>Explanation of energy and water policy required, is it unnecessary repetition of policy 2, or is it over &amp; above? If so needs further detail.</p> <p>Greater flexibility required regarding use of existing building.</p> <p>Provision of riverside walk is unnecessary in this location. Permeability of the site is accepted.</p>	<p>Energy &amp; water efficiency comments accepted</p> <p>Approach to existing buildings with reference to existing site allocation policy accepted.</p> <p>Approach to riverside walk in this location reviewed.</p>	<p>Energy and water reference omitted as covered in strategic policy 2.</p> <p>Approach to existing buildings revised.</p> <p>Riverside walk requirements omitted as this is not a priority of RWS &amp; cannot connect to West. Permeability and making most of</p>

		<p>Previous consents have been granted on site &amp; continued pre-app discussions are underway.</p> <p>Suggested amendments to site policy:</p> <ul style="list-style-type: none"><li>• Whilst the principle of securing a high quality design is supported, clarification is required as to what is envisaged by energy and water-efficient design. If the requirements are the same as those required by Policy 2 (Sustainable Communities) the reference should be removed in order to avoid duplication of policies. It is not a requirement that has been repeated in other site specific policies. If the requirements are greater than those detailed in Policy 2 (Sustainable Communities), the policy needs to make it clear that they are subject to feasibility and viability, so as to no undermine the deliverability of the site.</li><li>• As per the existing site allocation (Policy 21), rather than state that any proposal should 'seek to retain and secure the beneficial regeneration and reuse of existing riverside buildings', the policy should state that 'development</li></ul>			riverside location addressed in policy requirements
--	--	---	--	--	---

		<p>may include either the conversion of existing buildings or redevelopment'. This approach provides flexibility and reflects the potential complexities relating to the comprehensive redevelopment of a city centre site and that the reuse of buildings may not be practical or feasible.</p> <ul style="list-style-type: none"> <li>• The principle of providing permeability across the site is supported. However, the requirement of a riverside walk should the existing buildings be demolished is considered unnecessary. The principle of permeability can be achieved without the provision of a riverside walk and given there is no riverside walk to the west or east of the site, the walk is considered unnecessary, given that it would cover a small area and, therefore, serve little function.</li> </ul> <p>Suggested policy wording has been included in rep.</p>			
Historic England	Object	<p>This site is located within the Norwich City Centre Conservation Area. There are a number of listed buildings in the vicinity of the site including St Gregory Church and Strangers Hall Museum, both listed at grade I, 2 Charing Cross</p>	<p>Broadly supportive of principle of redevelopment of site, welcome commitment to appropriate scale &amp; form of development</p>	<p>Additional detail required relating to historic environment and heritage assets accepted.</p>	<p>Additional bullet point included to strengthen reference to heritage assets.</p>

		<p>listed a grade II* as well as numerous buildings and structures listed at grade II. Redevelopment of the site therefore has the potential to affect these heritage assets and their settings. This site benefits from Planning permission and so the principle of development has already been established on this site. Historic England is broadly supportive of the principle of redevelopment of this site and has provided advice over many years in relation to this site.</p> <p>We welcome the commitment in the policy to an appropriate scale and form of development in bullet point 1</p> <p>We welcome the reference to the conservation area in bullet point 1 but suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p>	<p>Concern regarding intention to increase density on site &amp; potential impact on heritage assets.</p> <p>Welcome the commitment to riverside access for walk.</p> <p>Welcome reference to Conservation area but suggest further bullet point is added to directly address other heritage assets affected by proposed development.</p>	<p>Riverside walk approach reviewed in association with other representations received.</p>	<p>Riverside walk wording amended to reflect the absence of riverside walk connectivity to West.</p> <p>Scale and form already referenced in policy requirements – no change</p>
--	--	---	---	---	--

		<p>We welcome the commitment to riverside access for walk in bullet point 4.</p> <p>We note a desire to increase density at the site but emphasise that it is important that this must not cause a greater degree of harm on the historic environment.</p> <p>Suggested Change: Suggest that a separate bullet point is included in relation to the historic environment in relation to the need to Conserve and enhance the significance of heritage assets (including any contribution made to their significance by setting) including the City Centre Conservation Area, Grade I listed St Gregory's Church and Strangers Hall Museum, grade II* listed Charing Cross and other buildings listed at grade II.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Welcome reference to water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No Change</p>
Environment Agency (Eastern Region)	Comment	<p>The site lies in present day Flood Zone 2, but once climate change is added to the flood levels, the majority of the site lies in Flood Zone 3a High Probability. If</p>	<p>Site is within flood zone 2 and climate change flood zone 3. Suggested outline</p>	<p>Additional detail welcomed</p>	<p>Policy requirement added – additional comments in policy notes</p>



		<p>possible the development should be sequentially sited on land to the south in Flood Zone 1.</p> <p>If development is required to be sited within these future Flood Zone 3 (1%cc) outlines then the more vulnerable residential development will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any new built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to the south to provide the compensatory flood storage.</p>	<p>approach required to address this.</p>		
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNL0312 is firmer saying 'will'.</li> </ul>	<p>Ambiguous Affordable Housing policy wording requires strengthening.</p> <p>Clarification required relating to energy and water policy wording.</p>	<p>Affordable Housing, Energy and Water requirements dealt with in strategic policies – to be omitted from site specific policies to</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p>

		<ul style="list-style-type: none"> <li>• Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document?</li> <li>• Where it says ‘respect its riverside location’ what does that mean? Could it make the most of its riverside location?</li> <li>• Bullet point 2 – so will the development be on the existing car park?</li> <li>• Bullet point 4 implies the walkway/cycleway/ will be provided as part of the scheme – but other policies are not that clear. Is the scheme expected to provide the walkway/cycleway and to what standard?</li> </ul>	<p>Clarification required to riverside location required.</p> <p>Clarification regarding decommissioning carpark required.</p> <p>Detail required relating to walkway/cycleway.</p>	<p>be consistent with policies throughout hierarchy</p> <p>Existing car park is temporary consent., the policy does not seek to retain this use, but to maximise developable are in this location.</p> <p>Riverside walk approach reviewed in association with other representations received.</p>	<p>Energy and water requirements omitted as covered in strategic policy 2</p> <p>Riverside walk wording amended</p>
--	--	---	---	--	---

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0409R Land at Barrack Street/Whitefriars, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	5
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 3 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
CODE Development Planners Ltd for Jarrod & Sons Ltd	Object	<p>Earlier representations contended that the area currently identified as GNLP0409R be included within the Greater Norwich Local Plan (GNLP) as two separate allocations with the areas shown on drawings 8436-FM-DR-2000-A00 and 8436-FM-DR2001-A00. Jarrod &amp; Sons contend that a single allocation as set out under GNLP0409R is unsound</p> <p>The undeveloped land within Jarrod &amp; Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.</p> <p>Planning permission 18/01286/F has lawfully commenced on site, it is</p>	<p>The site allocation policy is unsound, based on insufficient and out of date evidence. The amalgamation of the two allocations is inappropriate and should be reviewed in accordance with detail provided.</p> <p>Parking issues exist with unbalanced approach across plan area which</p>	<p>Approach to allocation split into two areas to reflect current consents and future intentions as suggested</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Whitefriars site policy reflects</p>	<p>Allocation split into two areas to reflect current consents and future intentions as suggested</p> <p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Whitefriars site policy reflects current consent.</p>

		<p>expected to be close to completion by the time the GNLP is examined by an inspector &amp; fully complete by adoption of GNLP under current timescales.</p> <p>The approved site provides 10% affordable housing.</p> <p>Planning consent 08/00538/RM – plots F1 &amp; F2 have been agreed by Norwich City Council as lawfully commenced – therefore the permission is in perpetuity (however the sites have not progressed despite active marketing)</p> <p>Planning consent 15/01927/O has lapsed.</p> <p>Allocation needs to address market trends for car parking allowances for site to be considered desirable.</p> <p>GNLP0409R as proposed is not considered sound, and undermines the soundness of the plan.</p> <p>Affordable housing requirement unrealistic due to 10% consented on approved scheme would make development of remaining land unviable if it were expected to provide the shortfall from the 28% policy requirement.</p>	<p>undermines the strategy &amp; hierarchy.</p>	<p>current consent. Barrack Street policy includes flexibility</p> <p>Site is in a location appropriate for low car or car free housing alongside other commercial and ancillary uses.</p> <p>Parking issues refer to strategic approach.</p>	<p>Barrack Street policy includes flexibility</p> <p>Site is in a location appropriate for low car or car free housing alongside other commercial and ancillary uses.</p> <p>Parking issues refer to strategic approach.</p>
--	--	---	---	---	--

		<p>Contest that this is not an artificially subdivided site.</p> <p>No evidence that mixed use development required by policy is viable &amp; deliverable &amp; no response to why the alternatives proposed by Jarrold &amp; Sons in previous consultations/call for sites are not reasonable..</p> <p>Jarrold &amp; Son contend that due to the context of the remaining area of land available for development (i.e. the area of the proposed allocation excluding the area of Hill Residential's development) the land use is less important than the quality of development and that the remaining areas are developed.</p> <p>There are easier sites to develop for either employment or residential uses within the GNLP area, and therefore policy restrictions which specify a use or that the uses should be mixed when there is no evidence for this, renders the GNLP unsound. The GNLP0409R allocation as currently worded undermines other policies within the GNLP.</p> <p>Without suitable mechanisms to support city centre development it is unlikely</p>			
--	--	---	--	--	--

		<p>growth will follow the distribution set out in the settlement hierarchy as outlined in GNLP policy 1 or that the GNLP will deliver the 30.8ha of city centre employment sites as outlined in GNLP policy 6.</p> <p>Evidence suggests that there is a potential oversupply of office/employment land in the plan area. Constraints in Norwich City Centre regarding cost of land &amp; reduced car parking levels threaten desirability of this type of development within the city: <i>“to avoid being found unsound the GNLP, through a combination of carrot and stick policies, needs to ensure that high density employment uses are concentrated in locations aligned to the growth/settlement hierarchy otherwise market forces will continue to direct office development away from the city centre. The rhetoric in the currently worded GNLP does not appear to lead to allocations which reflect a greater Norwich philosophy, instead there remains strategic tension between the locations which have historically been the singular focus of each of the authorities when acting individually. Unless the GNLP addresses the conflict</i></p>			
--	--	---	--	--	--

	<p><i>within its documents and evidence base it fails the tests of soundness”.</i></p> <p>Imbalance in parking policies between Norwich &amp; Broadland: <i>“Until this imbalance is addressed through the inclusion of specific policies, the Strategy of the GNLP is unsound as there is no evidence that the Strategy will facilitate the delivery of city centre development and therefore be in compliance with Policy 7.1”</i></p> <p>Jarrold &amp; Sons contends that specific parking provisions should be included within the policy allocations for the area covered by the suggested policy allocations map (drawing 8436-FM-DR2001-A00). 180 car park spaces for the sole use of tenants of office accommodation within St James Place and Gilders Way office developments. This figure is arrived at to accommodate the 127 residual car parking spaces as part of Condition 10 15/01927/O and the 53 spaces as part of the design of area F.</p> <p>Amalgamation of previously separate allocations does not reflect the up to date position in relation to extant planning permissions and associated construction</p>			
--	---	--	--	--

		<p>and completions. In its current form it does not satisfy the test of soundness. It has been made without sufficient or up to date evidence.</p> <p>Whilst Jarrold &amp; Sons supports the move away from the outdated allocation of CC17a and CC17b the proposed approach to assessing the site is unjustified. The evidence base does not contain details of the assessments for the reallocation potential of existing commitments to support the sites amalgamation.</p> <p>Suggested modifications to the policy wording have been provided by CODE.</p>			
Historic England	Object	<p>This site includes the grade II listed 77-79 Barrack Lane, part of the City Walls and towers which is a scheduled monument and also the western part of the site lies within the City Centre Conservation Area.</p> <p>This is the immediate setting of part of the Scheduled City wall, the grade I listed St James's Mill, the grade II listed numbers 77-79 Barrack Street and the grade I listed former church of St James. It is also in the wider setting of a number of other heritage assets including Norwich cathedral. Any development of</p>	<p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets.</p> <p>We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City</p>	<p>Incorrect reference to ancient acknowledged and to be amended</p> <p>Part of this site is currently under development. As part of the application, significant consideration was given to the historic environment. We</p>	<p>'ancient' deleted 77-79 Barrack street directly referenced.</p> <p>Additional HIA not considered necessary</p>



		<p>the site has the potential to impact upon these heritage assets and their settings The site was most recently occupied by Jarrold's printing works which incorporated the 1836 textile mill and an abutting modern building which now contains the printing museum. The site has much earlier origins and stands between the river Wensum and the medieval city wall. This section of the wall ran between the tower on Silver Road to another on the waterfront. As well as River Lane, a street running immediately inside the wall, the site featured a number of elongated property boundaries stretching back from the river reflecting the value of waterfront commercial property. Within the walls was a densely built mixture of domestic and commercial property with the part of the application site outside the walls less developed with garden areas surviving through to the 20th century. In the 19th century the commercial property along the waterfront was redeveloped sometimes without heed to the medieval boundaries with more substantial building of which St James' mill is a good example. This tall, elegant building establishes a scale of development on the waterfront which other modern building adjacent has respected. At the</p>	<p>wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.</p>	<p>are satisfied that the information produced by the developers and our review of this is sufficient. Additional text relating to historic environment to be included in policy but request for HIA not considered a requirement for this policy.</p>	
--	--	--	---	--	--

		<p>northern side of the site the small houses of the 18th and early 19th centuries which characterised parts of Norwich before the Victorian period are represented by numbers 77-79 Barrack Street. These are remarkable survivals and reflect the scale of much of the historic building in this area. The 19th and early 20th century building on the northern side of Barrack Street is also domestic in scale while the former church of St James (the Norwich Puppet Theatre) is a relatively modest building of the 15th century with a low octagonal tower.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. We suggest a more detailed HIA is prepared for this site. We welcome the reference to the City wall in bullet point 2 (although delete the word ancient as we would normally refer to these as scheduled monuments now). We suggest that you specially refer to the grade II listed 77-79 Barrack Street.</p> <p>Suggested Change: Delete ancient</p>			
--	--	---	--	--	--

		Refer specifically to 77-79 Barrack Street. We suggest a more detailed HIA is prepared for this site.			
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	welcome the reference made to the achievement of a water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.
Environment Agency (Eastern Region)	Comment	The development should be sequentially sited in future Flood Zone 1 where possible. If development is required to be sited within these future Flood Zone 3 (1% annual probability with 35% climate change) and Flood Zone 2 (0.1% annual probability with 35% climate change) flood outlines then the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change	Development should be sequentially located in future Flood zone 1 where possible.  Advised approach to any development within areas of future flood zone 3 within the site.  Note exiting consent which was not objected to by Environment Agency..	Additional detail welcomed	No change

		<p>flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change.</p> <p>We note that there is an extant planning permission for the site, to which we had no objection, so these requirements should have already been taken into account.</p>			
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Could it make the most of its riverside location?</li> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Bullet point 1 – where it says the design will be energy and water efficient, is that beyond the 110l/h/d and 20% above Part L requirements set out in the other document?</li> <li>• Bullet point 7 – so will they provide a river side path? Or maybe do it? Part of the bullet says to do it and then the other says potential future extension – suggest this is clarified. GNLP0401 equivalent bullet points implies the walkway/cycleway will be provided as part of the scheme. Is the scheme</li> </ul>	<p>Ambiguous wording of Affordable Housing policy.</p> <p>Clarification of water &amp; energy efficiency policy – or is this repetition of policy 2?</p> <p>Clarification required relating to riverside setting &amp; provision of walkway/cycleway.</p> <p>Contradictory approach to car parking on site.</p>	<p>Policy to be reviewed and amended as necessary.</p> <p>Approach to riverside walk revised in response</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Water efficiency omitted – covered in strategic Policy 2</p>

		<p>expected to provide the walkway/cycleway and to what standard?</p> <ul style="list-style-type: none"> <li>• Page 24, para 2 – so the policy refers to car free or low car usage, but the offices will have a car park; is that contradictory?</li> </ul>			
--	--	---	--	--	--

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0451 Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street, Norwich. (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	2
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 1 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Historic England	Object	The site lies within the City Centre Conservation area and there are a number of grade II listed buildings nearby. Any development of the site has the potential to impact upon these heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and	Supportive in principle subject to including reference to heritage significance in the policy. Include reference to scale and massing in policy	Need for reference to scale and massing accepted.	Policy wording reviewed and amended to address heritage assets, scale and massing

		<p>enhances the heritage assets. This should be reflected in the policy. We welcome the reference to the Conservation Area and other heritage assets in bullet point 1.</p> <p>Suggested Change: We suggest including reference to significance in the policy. Include reference to scale and massing in policy.</p>			
Anglian Water Services Ltd.	Comment	We welcome the reference made to the achievement of a water efficient design. Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.	Welcome the reference made to the achievement of a water efficient design - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Water efficiency reference omitted due to repetition of policy 2

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP0506 Land at and adjoining Anglia Square, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	7
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 5 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Chris Watts on behalf of Columbia Threadneedle	Support	<p>Anglia Square is the most significant regeneration site in Norwich City Centre and currently the subject of a 'call-in' public inquiry for comprehensive redevelopment comprising up to 1,250 homes (including a minimum of 120 affordable homes), hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship, and associated works to the highway and public realm.</p> <p>Accordingly, we support the provisions of Policy GNLP0506 which allocates land at and adjoining Anglia Square for residential-led mixed use development as the focus for an enhanced Large</p>	<p>Subject to outcome of public enquiry the site owner considers it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes.</p> <p>This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>	Support welcomed	No change

		<p>District Centre and to act as a catalyst for wider investment in Norwich City Centre.</p> <p>We consider it a realistic prospect that the site will deliver in the region of 1,200 homes including a minimum of 120 affordable homes. This accounts for viability considerations and is consistent with the current proposals for Anglia Square.</p>			
Historic England	Object	<p>Site is within Norwich City Centre Conservation area and affects the setting of numerous listed buildings. Any development of the site has potential to impact upon these heritage assets.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. However, object to the allocation as currently proposed.</p> <p>The scale of the proposed development would be inconsistent with the council's development management policies, as well as with broad strategic objectives, because it would entail development which would cause severe harm to the</p>	<p>Concerns relating to scale and form of development, its impact (harm) locally and in a wider perception on heritage assets and the historic character of Norwich.</p> <p>suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density</p>	<p>Concerns noted as per concerns raised by Historic England relating to current planning application under consideration/call-in.</p> <p>Need to strengthen wording relating to heritage assets acknowledged and accepted.</p> <p>Work relating to tall buildings in Norwich is ongoing separate to this site specific policy.</p>	<p>Wording relating to heritage assets strengthened.</p> <p>Tall buildings work being covered in separate study.</p> <p>Densities and historic street patterns not in accordance with current SPD approach &amp; application subject to current call-in/inquiry.</p>



		<p>character of the city centre conservation area and harm to a variety of other designated heritage assets of the highest significance.</p> <p>We consider that the indicative capacity of 1200 dwellings cannot be achieved without harm to the historic environment.</p> <p>we suggest that the allocation should be based on the reinstatement of the lost historic street pattern – as envisaged by the policies in the conservation area appraisal. It should rest on an understanding of how mid- to high density development can be accommodated in a manner appropriate to the wider character and grain of the city. Elements fundamentally incompatible with this – notably the provision of c. 600 car parking spaces – should be omitted. Finally the dwelling capacity should be reduced.</p> <p>in relation to the current wording of the allocation, there is currently no mention of the Conservation Area within the policy. We suggest this be amended.</p> <p>Bullet point 6 refers to a landmark building or buildings to provide a focal point for the northern city centre. We</p>	<p>development can be accommodated in a manner appropriate to the wider character and grain of the city</p> <p>Elements are fundamentally incompatible with this (such as 600 space car park)</p> <p>Dwelling capacity should be reduced</p> <p>Wording relating to historic environment, heritage assets including conservation area need to be included in policy.</p> <p>Lack of clarity over scale and massing of 'landmark building'</p> <p>Suggested Change: Include reference to the City Centre Conservation Area and other heritage assets in the policy.</p>		
--	--	---	--	--	--

		<p>have concerns regarding this bullet and in particularly the lack of clarity regarding an appropriate scale and massing of such development. We do however welcome the need for any such development to be sited to conserve and enhance heritage assets and their setting (although again we would recommend the inclusion of the word significance).</p> <p>However, it is about more than just individual heritage assets and their settings but extends to the character and skyline of the city as a whole. To that end we suggest that further work needs to be done to provide an appropriate evidence base for a tall buildings strategy for the city</p> <p>.</p>	<p>Amend policy to reduce indicative dwelling capacity, remove requirement for car parking, and ensure the reinstatement of the historic street pattern and a more appropriate density of development to reflect the grain of the area and to conserve and enhance heritage assets.</p> <p>The policy will need to be reviewed following the outcome of the Planning Inquiry for this site.</p> <p>Undertake a tall buildings study to inform an appropriate strategy for such development within the City – see comments in Appendix A</p>		
Pegasus Group for into Properties Plc	Object	We do not have any objection to the principle of the regeneration of Anglia Square, rather intu wish to ensure that any future redevelopment of Anglia	Concerns raised that Anglia Square should retain it's position as a large district centre as	Reference to Anglia Square's position as part of a large district	reference made to retail units contributing to the Magdalen

		<p>Square will be appropriate to its role and function as a large district centre and some wording changes to the policy for site GNLP0506 are suggested in the full representation.</p> <p>Clearly, the draft Strategy Greater Norwich Local Plan seeks to ensure that redevelopment of Anglia Square will be appropriate to the form and function of its role as a Large District Centre. The redevelopment of Anglia Square will therefore need to serve the daily needs of its existing and proposed resident populations (for example, in relation to convenience shopping provision). Furthermore, its retail offer should be distinct from the primary retail functions of the City Centre and compliment rather than compete with the City Centre.</p> <p>However, the Site-Specific Allocation for Anglia Square (Policy GNLP0506) is silent on the need for the redevelopment proposals to create a form of development that is appropriate to its role and function as a large district centre.</p> <p>In order to ensure compatibility with the draft Strategy document of the Greater Norwich Local Plan, it is necessary for site specific Policy GNLP0506 to</p>	<p>designated in the hierarchy, to support and not compete with city centre retail offering.</p> <p>Focus on reduced reliance of car use rather than provision of large car park.</p>	<p>centre acknowledged – include in policy.</p> <p>Low car or car free housing is already supported within the policy requirements; car parking to support the local centre as existing surface car parking provision in this location is being lost &amp; existing multi-storey is no longer functioning. There is not a specified quantum of car parking spaces required in the allocation policy, this would be subject of consideration of a planning application</p>	<p>Street/Anglia Square large district centre</p> <p>No change relating to car parking in policy.</p>
--	--	---	---	---	---

		recognise the need for any scheme coming forward to complement rather than compete with the city centre in terms of trading potential, to serve the day to day convenience needs of its resident hinterland, and will be appropriate to its role and function as a large district centre (recognising its position in the local retail hierarchy).			
Cathedral, Magdalen and St. Augustine's Forum (CMSA)	Object	<p>CMSA objects to the designation of the Anglia Square site for 1200 housing units. This represents an over-densification of the site, and one that fails to take account of the principally mid-rise nature of this part of the city centre, its heritage context, and the mixed use and fine grain nature of the surrounding areas, which is emerging as Norwich's creative and digital industries quarter.</p> <p>The proposed allocation is contrary to the very high level of local opposition and statutory consultee objections</p> <p>These representations, and much of the evidence presented at the call-in suggest that the quantum of residential development proposed for the hybrid development application, which we note is being proposed as the allocation of residential units for the purposes of the</p>	<p>1200 dwellings allocated to the site which was the subject of the Weston development to be too great a number</p> <p>This density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk).</p>	<p>Density of allocation is informed by viability of scheme considered through recent planning application and failure of previous lower density consents to deliver on this site. Following the decision from the call-in application housing numbers/density to be reviewed.</p> <p>Objection relating to building safety do not directly relate to the</p>	Revise housing figure for policy

		<p>Greater Norwich Local Plan, was plainly too great combined with that of commercial units to be sustainable on this site.</p> <p>This does not conform to the requirement to allocate 'sustainable development' as set out in the NPPF. The recent Heathrow decision demonstrates the Government's resolution to deliver on sustainable development, and we suggest that if the plan incorporates this intention in this location, then it will not meet the test of sustainability.</p> <p>There are further issues of building safety attaching to high and over dense development which are highlighted by the Hackitt report and which the public enquiry on Grenfell currently underway is beginning to reveal. We do not believe that there is any reason for central Norwich to accept this level of density given that there is an 'overhang' of unexercised permissions across the greater Norwich area which are a hangover from the GNDP. As land supply is patently not the issue in solving Norwich's housing needs this ill-conceived and over dense allocation should be removed from the plan.</p>	<p>A quantum of residential dwellings considerably in excess of 1200 could be achieved in the North City Area but over a wider area drawing upon a number of redevelopment sites.</p> <p>There should now be an imperative (following the representations made by many objectors during the course of the public enquiry which showed that the form of development proposed by Weston/Columbia Threadneedle will not meet local housing needs) to adopt a strategic regeneration framework to deliver housing appropriate to meeting locally defined need with units with a range of typologies designed to meet</p>	<p>requirements of this allocation policy</p>	
--	--	--	--	---	--

		<p>the now expired North City Area Action Plan should have been updated by Norwich City Council, to consider a strategic regeneration and intensification approach to the wider area.</p> <p>This would have ensured that infrastructure needs of the fully regenerated area and its catchment could have been properly considered; parking could have been solved on an area-wide basis, and an appropriately scaled set of developments at both Anglia Square and a range of sites that may come up across the area over time at the 'gentle density' could have been planned for, such as was recommended in the Building better, Building Beautiful report as more desirable, valuable and liveable on a long term basis. Without having undertaken technical capacity studies it is our view that the 1200 residential units allocated to Anglia Square in the draft GNLP plan is both an over-densification of this sensitive site, and an under ambitious allocation for the wider North City Centre Area – were a coordinated area action plan to be put in place for the North City Centre area.</p>	<p>identified needs of local people.</p> <p>Additional transport issues related to Magdalen street serving the North East Growth Triangle proposals.</p>		
--	--	---	--	--	--

		we contend that this density of residential units precludes other uses such as those cultural, economic and community uses for which there is a need and local ambition, and which should be prioritised on a site that is so well served by public transport (of which there are not many across the whole of Norfolk)			
Member of public	Object	I object to a high rise building being built in the Anglia square area. The North of the city is a beautiful and historic area of the city with a sky line currently dominated by the spire of the cathedral. This area needs a building that will not spoil the skyline of the North of the city. Views from the Sewell Park would be spoilt and views from Mousehold. Norwich attracts a lot of visitors because it is such an attractive city. I don't want commercial forces to destroy the unspoiled nature of the city.	Inappropriate scale of building for location, impact on historic character of North City location and beyond	Objection to scale of building relates to recent planning application rather than requirements of site allocation policy. Scale of building is not explicitly expressed within site allocation policy, however, following result of recent inquirey, housing numbers to be reviewed.	Revise housing figure for policy
Member of public	Object	Proposed allocation is ill thought through & will bring little benefit to the area.  Big capital projects do not serve the needs of the population	Allocation is ill thought through, there is insufficient public benefit from the proposed development	Objections relate to the content of the planning application subject to call in. The allocation does not explicitly propose a	Revise housing figure for policy

		<p>Health &amp; Safety concerns relating to the scale of the tower.</p> <p>Proposal will result in a large debt</p> <p>The proposal will not serve the needs of the community who currently use Anglia Square.</p> <p>Development will take a long time to complete &amp; cause traffic issues.</p>	<p>Development will not serve the needs of the community who currently use Anglia Square</p> <p>Timescales required will cause disruption</p>	<p>tower to which health and safety concerns are raised. Following the decision of the recent inquiry housing figure to be reviewed</p>	
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design.</p>	<p>Absence of water efficient design in policy.</p> <p>Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Repetition of strategic policy 2 – not to be included in site specific policy. No Change</p>



<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2114 Land at and adjoining St Georges Works, Muspole Street, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lanpro Services Ltd for Our Place	Support	<p>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.</p> <p>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 [of Affordable Housing] specified within draft allocation GNLP2114 and respectively request that it be reworded to ensure that it promotes and does not constrain,</p>	<p>Affordable housing requirement is unevidenced &amp; has potential to make development unviable.</p> <p>Greater flexibility to proportion /mix of uses to aid viability &amp; deliverability.</p>	<p>Support for allocation welcomed</p> <p>Affordable housing policy dealt with in strategic policy 5. Not repeated in individual site specific policies to be consistent with approach across hierarchy</p> <p>As stated in policy supporting text – retention of</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies..</p> <p>No change to Flexibility of uses.</p>

		<p>the scale, form, mix and timing of the site's future development.</p> <p>Suggested revision to policy wording provided in representation.</p>		<p>existing employment is highly desirable as part of a wider initiative in the Northern City Centre Strategic Regeneration Area – no change</p>	
Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area and would appear to be immediately adjacent to the grade II listed 47 and 49 Colegate and Woolpack Public House. Any development of this site has the potential to impact upon these designated heritage assets and their settings. Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. At street level, it will be important for the new development on the rest of the site to reinforce the scale, form and grain of the historic streets around. We welcome the reference to the Conservation Area in bullet point 2. We suggest that specific mention is also made of the adjacent listed buildings. The policy should be amended to read that preserves and enhances the</p>	<p>Suggested Changes: Specific mention should be made of the adjacent listed buildings. The policy should be amended to read that preserves and enhances the significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p>	<p>Policy to be reviewed and amended as necessary.</p>	<p>Heritage policy wording strengthened.</p>

		<p>significance City Centre Conservation Area and nearby designated heritage assets including 47 and 49 Colegate and the Woolpack Public House, all listed at grade II including any contribution made to that significance by setting.</p> <p>We welcome the commitment in bullet point 4 to the protection of key views of the tower of St George's Colegate.</p>			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2159 Land at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane Car Park, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 2 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Bidwells for Dacre Property Holdings	Object	We wish to withdraw our support for the proposed residential allocation of the eastern part of the site (84-120 Ber Street and Mariner's Lane Car Park) on the basis that it is no longer available for residential purposes. Land to the west (147-153 Ber Street) remains available, and the current allocation (CC2) for a minimum of 20 dwellings on this part of the site should be carried forward.	Withdrawal of part of site from allocation	Policy maps and wording will need to be revised to address the impact of loss of part of this allocation.  Housing figures for Norwich will need to be amended to account for this change	Delete policy GNLP2159, reinstate / carry forward allocation CC2
Historic England	Object	This site lies within the Norwich City Centre Conservation Area. There is a grade II listed building, the Remains of the Church of St Bartholomew, to the	Suggested Change: We recommend amending the wording	Comments accepted, additional detail to	Policy GNLP2159 no longer promoted by landowner. Policy

		<p>north of the site and a number of grade II listed buildings on the opposite side of Ber Street. The Grade I listed Church of St John de Sepulchre lies to the south of the site and the site forms part of the setting of this church.</p> <p>Any development of the site therefore has the potential to impact upon these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. This should be reflected in the policy.</p> <p>We welcome the reference to the Conservation area and heritage assets including the Church of St John within bullet point 1. The policy wording would be further improved by reference to significance.</p>	<p>of bullet point 1 to refer to significance. Include reference to scale and massing in policy.</p>	<p>be provided in policy.</p>	<p>to be deleted, existing allocation CC2 to be carried forward</p>
<p>Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	<p>Appropriateness / necessity of repeating strategic policy requirements in site specific policies</p>	<p>This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy</p>	<p>Policy GNLP2159 no longer promoted by landowner. Policy to be deleted, existing allocation CC2 to be carried forward</p>

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site 2163 Friars Quay Car Park, Colegate (former Wilson's Glassworks site), Norwich. (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lanpro on behalf of the landowner	Support	<p>Greater Norwich Local Plan Regulation 18 Draft Plan ref: GNLP2163 Friars Quay Car Park, Colegate</p> <p>This representation is made on behalf of the landowner of the above site to the current Regulation 18 consultation. The site has been considered by the Greater Norwich Local Plan (GNLP) as one of their preferred sites.</p> <p>The site is available, and the landowner is fully supportive of this site being allocated for the proposed development for a minimum of 25 dwellings.</p>	No issues requiring investigation	Support noted	No change

Historic England	Object	<p>This site lies within the Norwich City Centre Conservation Area. This site is an important one in this part of the Norwich conservation area and is in the setting of several listed buildings. It forms part of the south side of Colegate, the principle historic street of what was once the Norvic settlement and which contains numerous important historic buildings including several listed ones. A group of grade II listed buildings are situated on Colegate at the north end of the site as well as the parish church of St George (grade I listed) and the grade II* listed Bacon's House and numbers 2-9 Octagon Court. The site also lies in an interesting position in the conservation area where the nature of historic building changes. Modern development between Colegate and the river (Friar's Quay) is akin in scale and form to the generally low-rise, domestic scale of development on the north side of the River stretching along Colegate eastwards to Magdalen Street. The Friar's Quay development is a very successful and early example of modern residential development in an historic city which responds to the historic 'grain' of development from a time when development commonly disregarded it. To the west side of the application site is St Andrew's Street,</p>	<p>Significant heritage interest on site and in surrounding area. Suggested wording provided to strengthen the policy in this respect:</p> <p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>	<p>Comprehensive explanation of Heritage significance is welcomed.</p> <p>It is thought that references to St. Andrews Street may be a mistake, should this refer to St George's Street instead?</p>	<p>Heritage policy wording strengthened.</p> <p>Archaeological assessment requirement added</p>
------------------	--------	---	--	--	---

		<p>also characterised by relatively modest, pitched roofed development, both historic (including the grade II listed numbers 22-25 and later infill matching it. This street marks the point at which the character of historic development changes. The western side of St Andrew's Street features a former 19th century factory building filling a corner plot on Colegate. This is similar in form, though smaller than the 19th century Art College building across the river to the south. Upstream from the college is modern development of a similar scale. St Andrew's Street can therefore be seen as a 'hinge' point in this part of the conservation area and the application site being to the east of it falls within the area characterised by more domestic scale development, both old and new. Any development of the site therefore has the potential to impact upon a number of heritage assets and their settings.</p> <p>We consider that there is scope for development of this site, but it will need to be of an appropriate scale and grain for this site. This should be reflected in the policy.</p> <p>We welcome reference to the Conservation Area and heritage assets and their settings in bullet point 1</p>			
--	--	---	--	--	--



		<p>although again suggest that the wording is slightly amended to include the word significance. The site itself also formerly contained a non-conformist chapel dating from the 18th century. The impact on buried archaeology of the development will need to be given full consideration.</p> <p>Suggested Change: We recommend amending the wording of bullet point 1 to refer to significance. Include reference to scale, grain and massing in policy. We also suggest reference to buried archaeology given the former non-conformist chapel on the site.</p>			
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficient design wording (compared to other proposed site allocation policies)	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP2164 Land west of Eastgate House, Thorpe Road, Norwich. (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	2 Support, 0 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lanpro on behalf of the landowners	Support	As noted in the representation the site has been subject to a planning application and approval at planning committee (ref:16/01889/O). The site is available and has been found to be suitable and appropriate for a development in the region of 20 homes through the planning process.  The landowner is fully supportive of this site being allocated for the proposed development.	No issues requiring investigation	Support welcomed	No change
Historic England	Support	This site lies just outside of the Thorpe Ridge Conservation Area. Any development of the site therefore has the potential to impact upon the setting of the Conservation Area.	No issues requiring investigation	Support welcomed	No change

		We welcome the reference to the Conservation Area in the policy.			
Anglian Water Services Ltd.	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficiency policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No change

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3053 Land at Carrow Works, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 4 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Member of public	Support	<p>The site has not previously been promoted for redevelopment for other purposes because it was an operational industrial site. There is a pressing need for new housing in Norwich and this brownfield site is ideally situated to make a significant contribution in a sustainable location which could lead to substantial townscape and access benefits.</p> <p>The council's affordable housing policy seeks 33% provision but many housing schemes are contending that the provision of affordable housing is not viable. A</p>	<p>Viability of Affordable Housing provision at 33%?</p> <p>Potential for a significant new quarter of Norwich in a sustainable location.</p>	Affordable Housing policy dealt with in Strategy – not duplicated in site specific allocation policies to be consistent throughout hierarchy.	Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.

		<p>scheme will need to be subject to a viability assessment.</p> <p>The site benefits from substantial heritage significance and a riverside location, there is an opportunity to create a whole new quarter around the heritage and open space assets.</p>			
Historic England	Object	<p>Part of this site lies within the Bracondale Conservation Area. The site includes the Scheduled Monument, Carrow Priory and grade I listed Carrow Abbey, as well as several grade II listed buildings including Carrow House and several Carrow Works buildings. There are also a number of grade II buildings nearby on the opposite side of Bracondale. Any development of this site has the potential to affect these designated heritage assets and their settings.</p> <p>Historic England is broadly supportive of the principle of redevelopment of this site, providing it is of an appropriate scale and massing and conserves and enhances the heritage assets. There is however currently no mention of these heritage assets in either the policy or supporting text. We therefore suggest the inclusion</p>	<p>Suggested Changes: We suggest the inclusion of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting). We suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or</p>	<p>Heritage context is welcomed and needs to be addressed in policy.</p> <p>Comprehensive masterplanning relating to the East Norwich Regeneration area is in its early stages. This work shall provide a basis for developing this policy.</p>	Heritage wording strengthened.

		<p>of wording referencing the assets and the need to preserve and enhance the significance of these assets (including any contribution made to that significance by setting).</p> <p>We suggest that open space be provided between the Abbey and the river to reconnect the Abbey to the river and to enhance the setting of the abbey.</p> <p>This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site. In particular we question the capacity of the site.</p> <p>We suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and inform the extent of the developable area (and hence capacity of the site) and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA</p>	<p>otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording. It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located.</p>		
--	--	--	--	--	--

		should then inform the policy wording.			
Fuel Properties Ltd	Comment	<p>I am supportive of this residential led allocation and its importance in unlocking the ENSRA. It has the capacity to deliver a significant number of affordable units alongside other uses which will result in a balanced and vibrant community, however , this must be balanced with delivery which relies on commercial viability.</p> <p>The delivery of homes within this allocation should not be disadvantaged by a "blind 33%" affordable housing contribution without regard to other affordable housing policies particularly with regard to encouraging brownfield development, CIL contributions, social value and community benefits.</p>	Affordable Housing provision at 33% risks disadvantaging viable development being delivered on this brownfield site?	Affordable Housing policy dealt with in Strategy – not duplicated in site specific allocation policies to be consistent throughout hierarchy.	Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.
Anglian Water Services Ltd	Comment	<p>Unlike other allocation policies there is no reference to water efficiency forming part of the design of this student accommodation.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Absence of water efficiency policy - Appropriateness / necessity of repeating strategic policy requirements in site specific policies	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. No Change

<p>Environment Agency (Eastern Region)</p>	<p>Comment</p>	<p>We need to ensure that SuDS within the development are sufficient to protect the water quality of the River Wensum and secondly any opportunities to improve riparian habitat to mitigate against the impacts of the development would help us to secure improvements necessary to meet good WFD status and help ensure that the development does not cause any deterioration.</p> <p>GNLP3053 The vast majority of the site is Flood Zone 1. There is a very small area to the north east of the site, adjacent to the river which is Flood Zone 3 now and in the future. Therefore the sequential approach must be applied to avoid built development within this small area of flood zone to allow it to continue to provide flood storage.</p> <p>The proposed bridge will need to be designed to be above the 1% flood level including 35% climate change to ensure that it does not obstruct flood flows or increase flood risk elsewhere. A Flood Risk Activity Permit must be obtained for the</p>	<p>Need for SuDS to protect water quality of river Wensum &amp; take opportunities to improve riparian habitat.</p> <p>Development should be sequentially located to areas of the site in Flood Zone 1</p> <p>Requirements relating to proposed bridge.</p>	<p>Policy wording to be reviewed, site subject to Level 2 SFRA</p>	<p>Recommendations/advice added to policy supporting notes</p>
--	----------------	---	---	--	--



		proposed bridge and any works within 8m of the main river Yare.			
Broads Authority	Comment	<ul style="list-style-type: none"> <li>• Bold text uses the word 'should' when referring to affordable housing level. But the later bullet points are introduced as 'will achieve'. The word should seems to weaken the requirement. CC4b, for example, does not mention 'should' indeed GNLP0312 is firmer saying 'will'.</li> <li>• Could it make the most of its riverside location?</li> <li>• Bullet point 1 – last part refers to not prejudice future development of or restrict options for the adjoining sites. But the Utilities site is over the river, so not adjoining. Should the policy refer to the Utilities site in this sentence as well?</li> <li>• Is the scheme expected to provide the walkway/cycleway and to what standard?</li> <li>• There appears to be little mention of designated heritage assets and there are a number on site /</li> </ul>	<p>Affordable housing policy &amp; wording to be reviewed</p> <p>Potential for enhancement of riverside location to be explored, including walkway/cycleway</p> <p>Wording relating to East Norwich sites/adjoining sites to be reviewed and clarified</p> <p>Conservation area and other heritage assets to be detailed in policy</p>	<p>Policy wording to be developed, informed by ongoing East Norwich masterplan work.</p>	<p>Affordable housing dealt with in strategic policy 5 – not repeated in site specific policies.</p> <p>Landscaping &amp; riverside wording strengthened</p> <p>Utilities site referenced</p> <p>Heritage policy wording strengthened</p>

		immediately adjacent, including the scheduled and highly graded Carrow Priory, listed former industrial buildings and Carrow House on King Street and the site is within the Bracondale CA			
--	--	--	--	--	--

**FOOTNOTE**

Please note that individual policies GNLP0360 (The Deal Ground), GNLP3053 (Carrow Works), and R10 (Utilities site) have now been combined into a single East Norwich Strategic Regeneration area strategic policy reference: GNLP0360/3053/R10

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Site GNLP3054 The site at St Mary's Works and St Mary's House, Norwich (Preferred Site)
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	3
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	1 Support, 1 Object, 1 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>	<b>DRAFT GNLP RESPONSE</b>	<b>PROPOSED CHANGE TO PLAN</b>
Lanpro Services Ltd for Our Place	Support	<p>The site owner Our Place, is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be a deliverable and suitable site for mixed use development that can come forward within the plan period to 2038.</p> <p>In light of potential fluctuations in market conditions and noting the lack of viability or deliverability evidence supporting the draft plan, they question the justification for the quantum specified within draft allocation GNLP 3054. They respectfully request that the wording be updated to ensure flexibility, such that it promotes and does not</p>	<p>Flexibility of quantum of units</p> <p>Flexibility in type of residential units</p> <p>Flexibility in mix of other uses on site</p> <p>Flexible approach to heritage assets and existing building use in redevelopment.</p> <p>Justification, evidence &amp; flexibility relating to</p>	Policy to be reviewed and amended as necessary.	<p>Type of residential not explicitly specified in policy.</p> <p>Other uses not considered to be restrictive in policy wording.</p> <p>Reduction in weight of approach to heritage assets not supported.</p> <p>Affordable housing dealt with in</p>

		constrain the scale, form, mix and timing of the site's future development.	viability to ensure a deliverable scheme.		strategic policy 5 – not repeated in site specific policies.
Historic England	Object	<p>This site is located within the City Centre Conservation Area. There are a number of listed buildings nearby including St Mary's Church and St Martin at Oak Church, both listed at grade I, and Folly House and Pineapple House listed at grade II.</p> <p>We welcome reference to the City Centre Conservation Area listed buildings and locally listed buildings within the bullet points.</p> <p>We recognise that this site is suitable for redevelopment, but any such development must be of an appropriate design, scale and massing given the sensitivity of this location in heritage terms, between two grade I listed churches.</p> <p>To that end we suggest that we suggest that a more detailed Heritage Impact Assessment be undertaken.</p> <p>We understand that this site has planning consent which broadly established the scale of development for the site.</p> <p>Suggested Change:</p>	<p>Greater emphasis of heritage assets required in policy</p> <p>Suggested detailed Heritage Impact Assessment is undertaken</p>	Policy to be reviewed and amended as necessary.	Heritage assets wording strengthened.

		We suggest that a more detailed Heritage Impact Assessment be undertaken.			
Anglian Water Services Ltd	Comment	<p>We welcome the reference made to the achievement of a water efficient design.</p> <p>Please also see comments relating to Policy 2 of the Sustainable Communities of the Strategy document.</p>	Appropriateness / necessity of repeating strategic policy requirements	This matter is dealt with under Policy 2 that applies to all sites. It is not necessary to include it in the allocation policy	Repetition of strategic policy 2 – not to be included in site specific policy. Reference omitted.

**PART 3 – ASSESSMENT OF NEW & REVISED SITES SUBMITTED DURING THE REGULATION 18C CONSULTATION**

**STAGE 1 – LIST OF NEW & REVISED SITES PROMOTED IN THE SETTLEMENT**

**LIST OF SITES TO BE CONSIDERED FOR RESIDENTIAL/MIXED USE ALLOCATION**

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>	<b>Status at Reg 18c consultation</b>
<b>Norwich</b>				
UEA, University Drive West, (Earlham Hall)	GNLP0133BR	1.29	University-related uses, including offices (Use class B1(a)), research and development (Use class B1(b)) and educational uses (Use class D1) providing in the region of 5,000 sq.m of floorspace.	Preferred
UEA, Land south of Suffolk Walk	GNLP0133DR	3.96	University related development	Preferred
Land south of Barrack Street	GNLP0409R	2.25	Development. Suitable uses consist of: residential (including residential care homes), offices and managed workspace, ancillary retail and professional uses (A1 an A2), restaurants, cafes and bars (A3 and A4) and associated car parking	Preferred
Carrow Bridge House	GNLP4056	0.10	11 storey block, 120 flats, restaurants	New site submitted
<b>TOTAL</b>		<b>7.60</b>		

**STAGE 2 – HELAA COMPARISON TABLE**

	Categories													
	Site access	Access to services	Utilities Capacity	Utilities Infrastructure	Contamination/ground stability	Flood Risk	Market attractiveness	significant landscapes	Sensitive townscapes	Biodiversity & Geodiversity	Historic environment	Open Space and GI	Transport & Roads	Compatibility with neighbouring uses
Site Reference														
Norwich														
GNLP0133BR	Green	Green	Green	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Green	Green
GNLP0133DR	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green
GNLP0409R	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green	Amber	Green
GNLP4056	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Red	Red	Amber	Green

## **STAGE 3 – SUMMARY OF COMMENTS FROM THE REGULATION 18 STAGE C CONSULTATION**

See Part 2 above

## **STAGE 4 – DISCUSSION OF NEW & REVISED SITES**

**In this section sites are assessed in order to establish whether they are suitable for allocation. For the purposes of Sustainability Appraisal, suitable sites are those which are considered to be Reasonable Alternatives. Sites not considered suitable for allocation are not realistic options and therefore are not considered to be reasonable alternatives. The discussion below outlines the reasons why a site has been deemed suitable or unsuitable for allocation. By association this is also the outline of the reasons why a site was deemed to be a reasonable or unreasonable alternative.**

**A range of factors have been taken into account to establish whether a site should, or should not, be considered suitable for allocation. These factors include: impact on heritage and landscape; impact on the form and character of the settlement; relationship to services and facilities; environmental concerns, including flood risk; and, in particular, a safe walking route to a primary school. Sites which do not have a safe walking route to school, or where a safe walking route cannot be created will not be considered suitable for allocation.**

**Conclusions in regard to a sites performance against the relevant factors have also been informed by the outcomes of the HELAA, as set out under stage 2, consultation responses received, as summarised in stage 3, and other relevant evidence**

A total of 4 submissions put sites forward in Norwich for prospective allocation in the GNLP in the Regulation 18c consultation (January to March 2020). 3 of these sites are revisions to sites already under consideration. 1 new site was submitted.

2 sites are promoted for residential development (or mixed use with an element of residential) totalling 2.35 hectares; 2 sites are proposed for other non-residential uses totalling 5.23 hectares.

Further review of site reference GNLP1061 has been undertaken following discrepancies between the strategy and site allocations policies and representations received.

### **GNLP0133BR UEA - University Drive West.**

Existing undeveloped part of Earlham Hall allocation R39 proposed to be re-allocated under revised boundary. The principle of development has been



established by virtue of the existing local plan allocation (R39). This is a brownfield site forming the previously consented (now lapsed) second phase of the Enterprise Centre development at Earlham Hall. The proposal reflects a form of development already agreed in principle and committed. The site with the larger boundary was a proposed preferred site under the Regulation 18c consultation. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). This site is considered reasonable to shortlist for further consideration at this stage subject to additional highway comments on proposed road layouts; Development Management comments about historic environment/landscape. These comments will be sought through the Regulation 18D consultation and taken account of at Regulation 19.

### **GNLP0133DR UEA - Land between Suffolk Walk and Bluebell Road.**

Existing undeveloped allocation R41 proposed to be reallocated with additional adjacent land to the north, moving closer to the existing Campus development, whilst excluding future development from around the Prospect. The principle of development has been established for the majority of the proposed site area by virtue of the existing local plan allocation (R41) as a strategic reserve for university expansion. Its allocation for development remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). The additional proposed site area is included in the emerging DFS which formed part of the evidence base for the Regulation 18c consultation. The potential development area provides an opportunity to complete the southern part of the campus. The enlarged site area has potential to accommodate a large proportion of the UEA growth requirements within the defined campus. The site with the smaller boundary was a proposed preferred site under the Regulation 18c consultation. This site is considered reasonable to shortlist for further consideration at this stage subject to additional highway comments on proposed road layouts; Development Management comments about historic environment/landscape. These comments will be sought through the Regulation 18D consultation and taken account of at Regulation 19.

### **GNLP0409R Land south of Barrack Street.**

This is a key city centre regeneration opportunity site currently allocated for comprehensive mixed-use development in the adopted local plan (CC17a) on a slightly different defined boundary. The site with the larger boundary which encompassed existing allocations CC17a and CC17b was a proposed preferred site for residential-led mixed-use under the Regulation 18c consultation.

The site is subject to extant consent 08/00538/RM however the site owner considers this consent to be unlikely to progress to completion following a number of years of marketing the site without success. The site also previously had outline consent (15/01927/O) for mixed use development including 200 homes which has since expired. This is a brownfield site where the principle of development has been

established by virtue of the existing local plan allocation (CC17a – part of) as well as extant and expired consents.

The revised proposal has been submitted for development by the Landowner consisting of the land east of the city wall scheduled monument not covered by planning consent reference 18/01286/F. The site promoters advise that they consider that the mixed-use allocation as previously consulted upon may not be deliverable and suggest a flexible approach is taken with a range suitable uses for allocation. Details and quantum of the suggested uses have not been provided at this stage.

The area of land between the west of the proposed boundary and Whitefriars which has been omitted from this submission (covering existing allocation CC17b and part of CC17a) is now subject to planning consent reference 18/01286/F. Phase 1 of this consent, which lies between the City Wall and the western border of the proposed revised boundary, has commenced on site and is forecast to be completed by August/September 2022 as such the land owner is no longer promoting this section of the site for allocation within the GNLP. However, phases two and three of the consented site remain un-commenced and contain the affordable housing element of the consent. Whilst this site may continue to be developed under the current permission, it is considered by the GNLP team that allocation of this outstanding area of the site should be given consideration.

This proposed revised site is considered reasonable to shortlist for further consideration at this stage subject to Development Management and historic environment/landscape comments. GNLP409R is suitable for further consideration, however there is concern over the level of proposed car parking suggested by the landowner which is potentially un-sustainable and further consideration should be subject to clarification on uses and allocation areas which are not included in this submission, with a commitment to delivery of residential development.

#### **GNLP4056 Carrow Bridge House:**

11 storey block consisting of 120 flats and 2 restaurants.

This site is considered unreasonable as it would involve development on and loss of open space protected under policy DM8 of the adopted local plan, without evidence that the site is surplus to requirements or any other justification. The proposed development would have impacts on landscape character and the setting of designated and undesignated heritage assets (including the historic city wall scheduled monument) with no clear compensatory economic benefit; potentially contrary to existing and emerging policy seeking to protect green infrastructure and open space. The proposed restaurant uses are unrelated to established or proposed centre in the retail hierarchy.

**STAGE 5 – SHORTLIST OF REASONABLE ALTERNATIVE SITES FOR FURTHER ASSESSMENT**

Based on the assessment undertaken at stage 4 above the following sites are considered to be reasonable alternatives.

<b>Address</b>	<b>Site Reference</b>	<b>Area (ha)</b>	<b>Proposal</b>
UEA, University Drive West, (Earlham Hall)	GNLP0133BR	1.29	UEA
UEA, Land south of Suffolk Walk	GNLP0133DR	3.96	UEA
Land south of Barrack Street	GNLP0409R	2.25	residential (including residential care homes), offices and managed workspace, ancillary retail and professional uses (A1 and A2), restaurants, cafes and bars (A3 and A4) and associated car parking
TOTAL (3 sites)		7.50	

**STAGE 6 – DETAILED SITE ASSESSMENTS OF REASONABLE ALTERNATIVE  
NEW & REVISED SITES**

<b>Site Reference:</b>	GNLP0133BR
<b>Address:</b>	UEA, University Drive West, (Earlham Hall)
<b>Proposal:</b>	University-related uses, including offices (Use class B1(a)), research and development (Use class B1(b)) and educational uses (Use class D1) providing in the region of 5,000 sq.m of floorspace.

<b>CURRENT USE OF SITE</b>	<b>BROWNFIELD/GREENFIELD</b>
Undeveloped part of Earlham Hall and unused nursery garden	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<b>Amber Constraints in HELAA:</b> Significant Landscapes, Significant Townscapes, Historic Environment.
<b>HELAA Conclusion:</b> The site is one of a number of land parcels within and adjoining the University campus. Site B immediately adjoins Earlham Hall and falls within the area currently allocated for exemplar business development, the first phase of which has been completed. The site is accessible to all local services and facilities. There are no known constraints from utilities infrastructure, utilities capacity, flood risk or contamination/ground stability. There are no nationally protected landscapes in the immediate vicinity although potential to affect the setting of Earlham Hall (grade 2* listed), the walls of the garden (separately listed grade 2), the adjoining registered historic parkland and the surrounding conservation area. Initial highway evidence has highlighted that potential access constraints could be overcome through development subject to transport assessment and implementation of agreed measures. The site boundary has been revised since the previous HELAA assessment to omit the Earlham Hall area to the West and include the area of land to the East connecting to University Drive. The site was previously subject to planning permission which has now expired and is subject to an existing allocation for a similar form of development, consequently it will not contribute any additional development capacity for the purposes of the HELAA analysis.

<b>FURTHER COMMENTS:</b>
<u>Ecology:</u> Near to UEA Broad CWS. Potential for protected Species <u>Highways:</u> Subject to transport assessment and implementation of agreed measures <u>Historic Environment:</u> this site was subject to archaeological trial trenching in 2012, large parts of site heavily disturbed by construction and demolition of glass houses no further archaeological work required. Development Management: The proposed revision

**PLANNING HISTORY:**

**12/01331/F:** Refurbishment and alteration of potting shed (B), coach house and stables (C) and garage (E1) for use as academic space (Use Class D1). Demolition of garage (D) and outbuildings (E5, E6, E7). Removal of CCTV camera poles; new CCTV cameras on building B west elevation and C north elevation. Relocation of refuse area. Minor changes to external works layout, materials and location of landscape furniture. (Approved 29/11/2012)

**12/01347/L:** Refurbishment and alteration of potting shed (B), coach house and stables (C) and garage (E1). Demolition of garage (D) and outbuildings (E5, E6, E7). Removal of CCTV camera poles; new CCTV cameras on building B west elevation and C north elevation. Relocation of refuse area. Minor changes to external works layout, materials and location of landscape furniture. (Approved 27/11/2012)

**12/02266/F:** Application for Full Planning Permission for Phase 1 and Outline Planning Permission for Phase 2 for proposed redevelopment of Earlham Hall environs; and Outline application for phase 2 comprising future buildings for business, research and educational uses (Class B1(a), B1(b) and D1) on the site of the nursery garden site, courtyard spaces between University Drive and Earlham Hall, pedestrian route between University Drive and Earlham Hall and associated landscaping. (Approved 01/07/2013)

**15/00809/F & 15/00810/L:** Refurbishment and alteration of existing buildings at Earlham Hall including: Potting shed (building B); coach house and stables (building C/D); garage (building E1). (Approved 24/12/2015)

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

In the representations submitted to the Regulation 18c consultation by Bidwells on behalf of the UEA they note:

*"In early 2020, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188). Representations were submitted by the UEA, recognising that the designation of the Historic Parkland would impact upon the continued prosperity and growth of the UEA. Notwithstanding this, regardless of whether the landscape is designated as a Historic Parkland, development on this site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA."*

Historic England has completed this review, whilst assessing the UEA as part of the Post-War Landscapes project (case no. 1466188) it was considered necessary to involve the inspection of Earlham Park C18 landscape. As this parkland is not post-war landscape it was assessed separately as an C18 landscape park. Case Name: Earlham park, Case Number: 1471366. The site area under assessment included the Enterprise centre and Earlham Hall and the area proposed for site reference GNLP0133BR. This has now been added to the register as Grade II

Historic Park and Garden. This registration is a 'material consideration' in the planning process meaning that planning authorities must consider the impact of any proposed development on the landscapes' special character. Details of the listing can be found here: <https://historicengland.org.uk/listing/the-list/list-entry/1471383>

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:**

- Greater Norwich Local Plan Regulation 18 Consultation Response: Bidwells on behalf of University of East Anglia
- [Emerging revised UEA Development Framework Strategy](#) (GNLP evidence base)

<b>Site Reference:</b>	GNLP0133DR
<b>Address:</b>	UEA, Land south of Suffolk Walk
<b>Proposal:</b>	University related development for both academic and non-academic uses.

<b>CURRENT USE OF SITE</b>	<b>BROWNFIELD/GREENFIELD</b>
Undeveloped open space fronting University Broad	Greenfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<b>Amber Constraints in HELAA:</b> Market Attractiveness, Significant Landscapes, Townscapes, Biodiversity and Geodiversity, Historic Environment.
<b>HELAA Conclusion:</b> The site is one of a number of land parcels (A-G) within and adjoining the University campus. Site D is on the southern edge of the campus south of Suffolk Walk and is allocated for campus expansion. The site is accessible to local services and facilities. Anglian water advises that there are existing foul and surface water sewers which require consideration as part of the site layout and design. There are no known constraints from utilities capacity, flood risk or contamination/ground stability. There are no nationally protected landscapes in the immediate vicinity although development has the potential to adversely affect the setting of the listed UEA campus buildings which are part of the original Lasdun design concept, the UEA Broad (a County Wildlife Site) and locally protected river valley landscape. There is evidence of prehistoric archaeological deposits on site. Initial highway evidence has highlighted that potential access constraints could be overcome through development subject to transport assessment and implementation of agreed measures. The site is considered suitable for the land availability assessment. The site boundary has been revised since the previous HELAA assessment to include additional land to the North / North-West of the site. The Southern element of the site is subject to an existing planning permission or allocation for a similar form of development, the additional land under consideration is not subject to existing planning permission or allocation. There are number of constraints but as these may be possible to mitigate the site is concluded as suitable for the land availability assessment. For the purposes of the HELAA capacity assessment this site is considered to be SUITABLE

<b>FURTHER COMMENTS:</b>
<u>Ecology:</u> Near to UEA Broad CWS. Potential for protected Species <u>Highways:</u> Subject to transport assessment and implementation of agreed measures

**Historic Environment:** Development of the site could have a detrimental impact on a designated or non-designated heritage asset, but the impact could be reasonably mitigated

**Development management:** Reference to be made Listed buildings across campus likely to be impacted. Consider affordable housing contributions relating to student accommodation. Work on a Green Infrastructure Strategy across the campus which will feed into future protection, mitigation and enhancement of spaces and habitats as new development comes forward has commenced.

**PLANNING HISTORY:**

No recent planning history

**OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

This is a greenfield site south of Suffolk Walk, part of the site consists of an existing allocation as a 'reserve' site for university expansion in the adopted local plan as site R41. The proposal reflects a form of development already agreed in principle and committed to address growth needs.

In the representations submitted to the Regulation 18c consultation by Bidwells on behalf of the UEA they note:

*"In early 2020, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (case: 1466188). Representations were submitted by the UEA, recognising that the designation of the Historic Parkland would impact upon the continued prosperity and growth of the UEA. Notwithstanding this, regardless of whether the landscape is designated as a Historic Parkland, development on this site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA."*

Historic England has completed this review of the landscape, this has not been designated. It is worth noting that the adjacent parkland at Earlham Park was reviewed at the same time which has been registered as Grade II Historic Park and Garden, however this does not directly impact the consideration of this proposed site. (See site GNLP0133BR for further detail relating to Earlham Park)

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:**

- Greater Norwich Local Plan Regulation 18 Consultation Response: Bidwells on behalf of University of East Anglia
- [UEA Development Framework Strategy](#) (GNLP evidence base)



<b>Site Reference:</b>	GNLP0409R
<b>Address:</b>	Land south of Barrack Street
<b>Proposal:</b>	Mixed use. Suitable uses consist of: residential (including residential care homes), offices and managed workspace, ancillary retail and professional uses (A1 and A2), restaurants, cafes and bars (A3 and A4) and associated car parking

<b>CURRENT USE OF SITE</b>	<b>BROWNFIELD/GREENFIELD</b>
The site was formally occupied by Jarrolds Printworks but is now largely vacant. The site is currently used as a temporary surface car park.	Brownfield

<b>CONSTRAINTS IDENTIFIED IN THE HELAA:</b>
<p><b>Amber Constraints in HELAA:</b> Contamination and Ground Stability, Flood Risk, Market Attractiveness, Significant Landscapes, Townscapes, Transport and Roads</p>
<p><b>HELAA Conclusion:</b> This 2.25ha brownfield riverside site close to the city centre at Barrack Street, with access taken from Gilder's Way was previously assessed over a larger boundary including land to the west to Whitefriars. This area which is subject to commenced planning approval reference 18/01286/F has been omitted. The site is proposed for a range of uses including: residential, (including residential care homes), offices and managed workspace, ancillary retail and professional uses (A1 and A2), restaurants, cafes and bars (A3 and A4) and associated car parking. Given the city centre location of the site, it has good access to key services and workforce catchment. No comments have been received from The Highways Authority at this time. There is potential contamination on the site as it was formerly a factory/print works, a large proportion of the site is in Flood Zone 2 and at risk of surface water flooding. There are landscape issues as the site is adjacent to Broads Authority area at the river and is further constrained by TPOs and group/site TPOs, the city centre conservation area lays just outside the boundary of the site to the south and west. There are no statutory or locally listed buildings on site. The city walls &amp; towers (scheduled monuments) lay just outside the site boundary to the west. There are no ecological constraints and no loss of publicly accessible open space. The site has some constraints, but it is considered that these could be mitigated through development.</p>

<b>FURTHER COMMENTS:</b>
<p><b>Development Management Comments:</b> The site is suitable in principle for development by virtue of its previous allocation and consents, however there are a number of concerns with what the promoter is proposing.</p> <p>The points we need to clarify are as follows:</p>

- We wish to see a residential led mixed-use allocation with a minimum number of housing units, not the specific range of uses that Jarrold wish to include. The housing figure needs to reflect the remainder of the Hill site as well as the 200 on the other part of the site.
- We don't want to make provision for parking spaces as that will be restrictive in terms of development capacity and isn't very sustainable.
- The undeveloped part of the Hill site should be included in the allocation.

#### **PLANNING HISTORY:**

**08/00538/RM** - Part Condition 2 : (Plots F1 and F2) Layout, Scale, Appearance and Landscaping (including 2c: Materials; Part 2d: Car Parking; 2h): Typical doors and windows) for 8,079 sq.m. office space (B1) comprising 198 sq.m. of ancillary retail space; (Revised Matters Application of Outline Consent 06/00724/F).

**15/01927/O** - Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces. (APPROVED)

#### **(Adjoining site – previously consulted on as part of this site)**

**18/01286/F** - Demolition of existing buildings and structures; erection of 218 dwellings; conversion, refurbishment and extension of two Grade II Listed Cottages, erection of 310sqm of commercial floorspace (Class A1-A5 use) and 152sqm of Museum floorspace (D1 use), with associated works. (APPROVED)

**18/01287/L** - Conversion, refurbishment and extension of 77-79 Barrack Street and alterations to the western boundary wall of the site. (APPROVED)

**19/01458/NMA** - Amendment to planning permission 18/01286/F. (APPROVED)

#### **OTHER CONSTRAINTS/ISSUES NOT IDENTIFIED IN THE HELAA:**

As detailed in earlier stages of this document; in their submission to the Regulation 18c consultation the site representative for GNLP0409R has proposed a revision of the site boundary to omit the area subject to planning consent 18/01286/F. They have suggested that the site policy should enable a non-specific flexible allocation with a broad range of uses they consider acceptable, alongside a substantial amount of proposed car parking (through development of a multi storey car park).

Following the recent consent, the allocation of this site under a revised boundary is considered appropriate. The landowner's suggestion to omit the area now subject to planning consent 18/01286/F is accepted to an extent; we consider that it is appropriate to split the site into two allocations, one (reference GNLP0409AR) to cover the area covered by planning approval 18/01286/F to ensure that the site is built out in its entirety including the un-commenced phases including the affordable housing contributions; the second site allocation (reference GNLP0409BR) to cover the area proposed in this representation.

**BRIEF SUMMARY OF PLANS/DOCUMENTS PROVIDED WITH THE SUBMISSION:**

Proposed site plan

## STAGE 7 – INITIAL CONCLUSIONS ON THE SUITABILITY OF NEW AND REVISED SITES FOR ALLOCATION

The new and revised sites shortlisted at Stage 4 have been subject to further consideration with Development Management, the Local Highway Authority and Lead Local Flood Authority and their comments are recorded under Stage 6 above. Based on their views the following initial conclusions regarding the suitability of the sites for allocation have been drawn.

### New and revised sites to be considered for allocation:

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
<b>Norwich</b>				
Land adjoining the Enterprise Centre at Earlham Hall	GNLPO133 BR	1.29	University-related uses, including offices (Use class E(gi)), research and development (Use class E(gii)) and educational uses (Use class F1) providing in the region of 5,000 sq.m of floorspace.	The principle of development has been established by virtue of the existing local plan allocation (R39) and outline planning permission. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). The site boundary includes undeveloped elements of the existing allocation. The revision to the boundary corrects an error made in the previous boundary proposed.
Land between Suffolk Walk and Bluebell Road	GNLPO133 DR	3.96	University related development for both academic and non-academic uses	The principle of development for a large proportion of this site has been established by virtue of the existing local plan allocation (R41) as a strategic reserve for university expansion. The proposed enlarged boundary reflects work done to maximise developable area in this location as part of the

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
				<p>UEA DFS 2019 refresh. Its allocation for development remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). The site boundary includes undeveloped elements of the existing allocation. The revision to the boundary corrects an error made in the previous boundary proposed.</p>
Land at Whitefriars	GNLP0409 AR	1.61	Residential-led mixed-use development. This will include a minimum of 220 homes. Offices and managed workspace, ancillary retail use, restaurants, bars, and recreational open space will be accepted as part of a balanced mix of uses	<p>This key regeneration site in the city centre is long term vacant. It consists of existing adopted local plan allocations CC17b and part of CC17a. It benefits from current consent for development for a residential-led scheme, of which phase 1 of three has commenced on site. The allocated site is expected to deliver 220 homes in accordance with the approved scheme. It is considered appropriate to progress this site to allocation as the affordable housing provision of the consent is on the un-commenced phases of this site; allocation protects affordable housing delivery expectations on the full developable area.</p>
Land south of Barrack Street	GNLP0409 BR	2.17	Residential-led mixed-use development. This	<p>This key regeneration site in the city centre is long term vacant. It consists of</p>

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
			will include a minimum of 200 homes. Offices and managed workspace, ancillary retail and professional uses, restaurants, cafes and bars, and recreational open space will be accepted as part of a balanced mix of uses	the remainder of the existing adopted local plan allocation CC17a which has not been developed and does not fall within the boundary of proposed allocation GNLP0409AR. Outline and detailed consents on this site provide for 200 homes and offices to deliver the remaining phases of the St James Place office quarter which is counted in the existing commitment. The allocated site is expected to deliver an equal number of homes to the existing consent although it is understood that this may come forward through a revised application for the site. The boundary of this site is consistent with the boundary submitted for consideration by the landowner as part of the Regulation 18C consultation process.

**New and revised sites considered to be unreasonable for allocation:**

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
<b>Norwich</b>				
Carrow Bridge House	GNLP4056	0.10	11 storey block consisting of 120 flats and 2 restaurants	This site is considered unreasonable as it would involve development on and loss of open space protected under policy DM8 of the adopted local plan, without evidence that the site is surplus to requirements

Address	Site Reference	Area (ha)	Promoted for	Reason considered to be unreasonable
				or any other justification. The proposed development would have impacts on landscape character and the setting of designated and undesignated heritage assets (including the historic city wall scheduled monument) with no clear compensatory economic benefit; potentially contrary to existing and emerging policy seeking to protect green infrastructure and open space. The proposed restaurant uses are unrelated to established or proposed centre in the retail hierarchy.

## **FINAL CONCLUSIONS FOR THE REGULATION 19 VERSION OF THE PLAN**

Up to the Reg 18C consultation there were 35 sites promoted for allocation for residential, employment, mixed use or university related development in Norwich totalling 151.06 hectares of land. The outcome of initial site assessment work (which is detailed in part 1 of this booklet) was to prefer 17 sites totalling 4,352 dwellings (New allocations: 1,580; Uplift on exiting commitment: 1,183; Commitment: 1,589) on 61.32 hectares of land:

- GNLP0068 [0.12ha] for 25 dwellings
- GNLP0133B [1.38ha] for university related development
- GNLP0133C [0.89ha] for 400 bed student accommodation (equivalent to 160 dwellings)
- GNLP0133D [2.74ha] for university related development
- GNLP0133E for 400 bed student accommodation (equivalent to 160 dwellings)
- GNLP0282 [0.27ha] for 12 dwellings
- GNLP0360 [21.90ha] for mixed use including 680 dwellings
- GNLP0401 [0.83ha] for 100 dwellings (or 250 student bedrooms)

- GNLP0409R [3.78ha] for mixed use including 300 dwellings
- GNLP0451 [0.38ha] for 40 dwellings (or 200 student bedrooms)
- GNLP0506 [4.79ha] for mixed use including 1200 dwellings
- GNLP2114 [0.57ha] for 110 dwellings
- GNLP2159 for 150 dwellings
- GNLP2163 for 25 dwellings
- GNLP2164 [0.19ha] for 20 dwellings
- GNLP3053 [20.00ha] for mixed use including a minimum of 1220 dwellings
- GNLP3054 [1.05ha] for 150 dwellings

### **Summary of comments from the Regulation 18C draft plan consultation**

Through the Regulation 18C consultation a number of comments were received regarding sites in Norwich. The main issues raised are detailed in part 2 above. These comments have resulted in changes to policy wording where appropriate.

Site GNLP2159 was withdrawn.

Following a review of allocations after the Regulation 18C consultation it was considered appropriate to merge individual East Norwich allocations GNLP0360 (Deal Ground), GNLP3053 (Carrow Woks) and R10 (Utilities site) into a single combined strategic allocation reference GNLP0360/3053/R10. The sites are expected to deliver a combined total of homes, employment and infrastructure to be determined under the ongoing masterplanning process. Combining the site allocations provides greater clarity to the intended co-operative outcomes than individual allocations.

A further assessment of GNLP1061 was undertaken following disparity between the strategic and proposed site policies and representations received during consultation. It is considered that only where evidence can demonstrate that there is insufficient demand for aviation related uses in the long term and where non-aviation development would act as a catalyst to deliver essential infrastructure to enable aviation related elements of the development should non-aviation related uses be permitted. Given the evidence set out within the Review of Office Accommodation in Norwich (Ramidus, 2020), it is not considered appropriate to allow non-aviation related office uses due to the potential harm that this could have upon Norwich's city centre and similarly it is not considered that retail and leisure uses would be appropriate in this out of centre location.

This site provides a unique opportunity as it is the only site that can provide development for aviation related uses. As such it should be safeguarded for aviation related employment and educational uses. If the site were to be developed for non-aviation related uses, this could mean that any potential to attract additional large aviation-related business, would be lost to the local area as there would be nowhere to suitably located it; as such it is proposed to allocate this site for aviation related uses, only releasing for consideration for alternative uses following a 40 year period as evidenced in the work carried out on behalf of Norwich City Council.



A review of the site boundary has been carried out. Of the site area submitted, part is in existing operational use (bordering the Broadland Northway to the North West boundary of the site), this area has been omitted from further consideration.

### **Assessment of new and revised sites submitted through the Regulation 18C consultation**

Four new and revised sites were also submitted through the consultation totalling 7.60 ha of land. All the new and revised sites were subject to the same process of assessment as the earlier sites (detailed in part 3 of this booklet). The conclusion of this work was that the revised sites resulted in updates to the existing proposed allocation policies. The proposed new site was assessed as unreasonable for allocation as the proposed development was harmful to heritage and open space constraints, inappropriate density & use for the site. After consideration and engagement with Development Management colleagues, and highways the revisions to the following preferred sites were considered to be appropriate:

- GNLP0133BR because the revision constituted a revision to the boundary which represented the area of land proposed for development which was incorrectly shown in Regulation 18c, the principal of development is established on this site through existing allocation and a previous planning consent now expired.
- GNLP0133DR because the revision constituted a revision to the boundary which represented the area of land proposed for development which was incorrectly shown in Regulation 18C. The proposed area to the North of the site had previously submitted but had mistakenly been omitted from Regulation 18C.
- GNLP0409R has been split into two allocations GNLP0409AR & GNLP0409BR because since the site had been originally submitted for consideration, permission has been granted and commenced on the area of land now proposed for allocation reference GNLP0409AR; site reference GNLP0409BR is the remainder of the site which is currently undeveloped.

### **Sustainability Appraisal**

The sustainability performance of each reasonable alternative site has been considered in the selection of sites. The Sustainability Appraisal includes a scoring and assessment narrative on the sustainability performance of each reasonable alternative and recommendations for mitigation measures which have been incorporated in policy requirements as appropriate. The Sustainability Appraisal ([insert link](#)) highlighted a number of negative and positive impacts for the sites in Norwich.

Sites in Norwich have commonalities. Shown in equal or similar scoring for matters of 'air quality and noise', Biodiversity & Geodiversity', 'landscape', 'population & communities', 'deprivation', 'health', 'crime', 'transport and access to services', 'historic environment', 'natural resources'. Based on the post-mitigation scoring matrix, out of the 15 criteria, sites typically scored 3 - 8 negatives, 2 - 7 'neutrals',

and 5 - 9 'positives'. Revisions made to sites GNLP0133BR, GNLP0133DR, GNLP0409R had minimal impact upon the scoring.

The Sustainability Appraisal highlighted a number of negatives scores for sites GNLP0360 and GNLP3053 in the East Norwich Strategic Regeneration area but it is considered that due to the size and strategic importance of these sites a number of these will be overcome by development and can be mitigated for through policy requirements, collaborative masterplanning and the design of development. For example air quality and noise impacts can be mitigated by careful design and layout situating residential elements away from road and rail infrastructure and locating employment uses in the areas.

The majority of sites in Norwich are previously developed allocation of such sites maximises brownfield development and regeneration opportunities focussing growth in this location with the best access to jobs, services and existing and planned infrastructure.

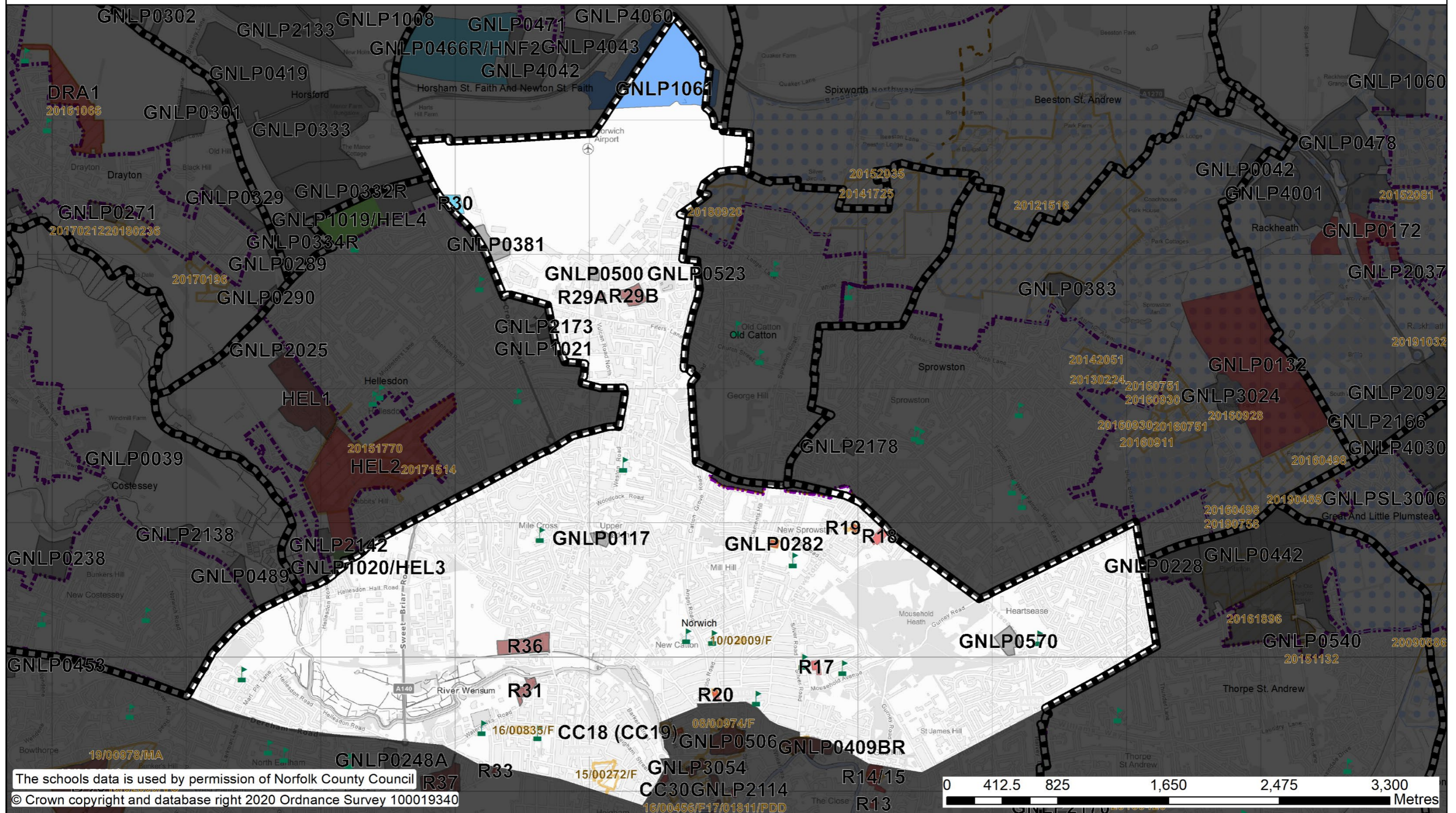
### **Final conclusion on sites for allocation in the Regulation 19 Plan**

Based on all the information contained within this booklet the final conclusion of the site assessment process for Norwich is to allocate sites listed in the table at appendix A.

See tables of allocated sites listed in the table at appendix A and unallocated sites at appendix B for a full list of sites promoted with reasons for allocation or rejection.

# NORWICH (NORTH)

## GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



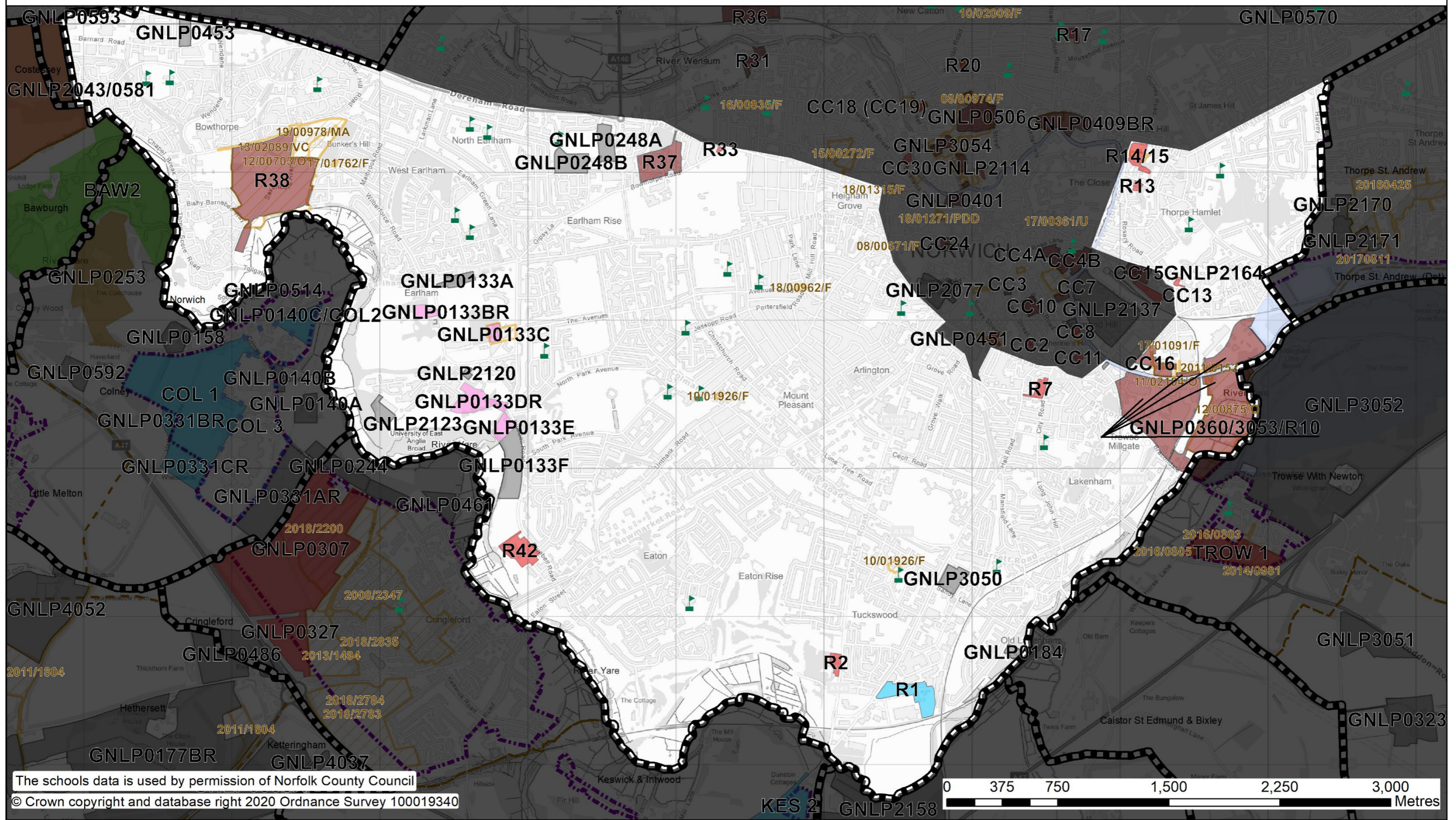
The schools data is used by permission of Norfolk County Council  
© Crown copyright and database right 2020 Ordnance Survey 100019340

Primary School	Housing Allocation	Aviation Related Employment Allocation	Burial Ground Allocation	Open Space/Leisure Amenity Allocation	Not Allocated	Growth Triangle Area Action Plan Boundary	Commitment*
Primary School Catchment (2018-19)	Mixed Use Allocation	Employment Allocation			Broads Authority Area	Settlement Boundary	Parish Boundary

\*new and extant permissions at 1st April 2020 (10 or more dwellings)

# NOWICH (SOUTH)

## GREATER NORWICH LOCAL PLAN PROMOTED SITES BY SCHOOL CATCHMENT AREAS



The schools data is used by permission of Norfolk County Council

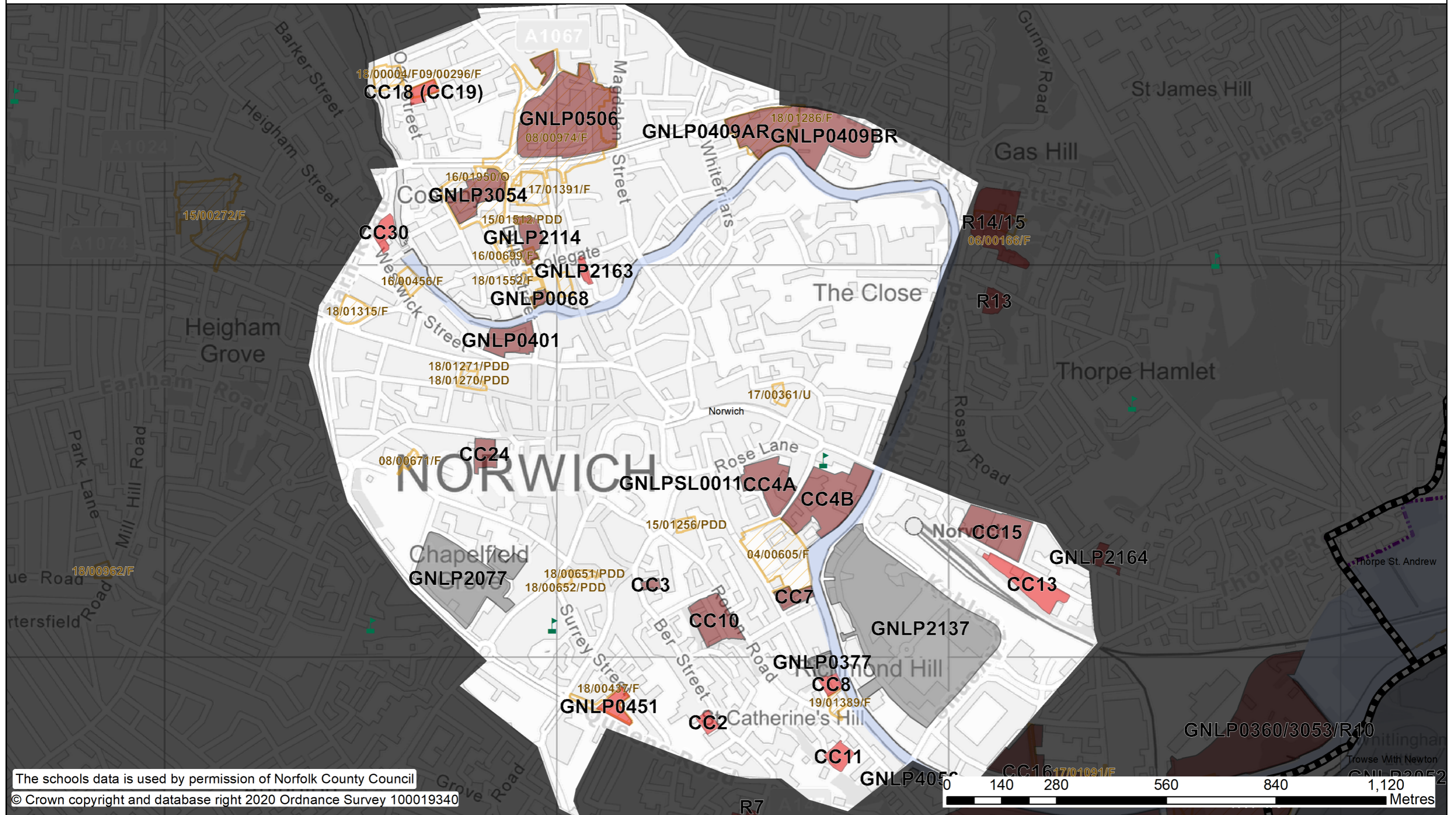
© Crown copyright and database right 2020 Ordnance Survey 100019340










Primary School	Contingency Housing Allocation	Mixed Use Allocation	Older People's Accommodation	University Related Allocation	Redevelopment of Existing Uses within Settlement Boundary	Broads Authority Area	Commitment*
Primary School Catchment (2018-19)	Housing Allocation	Employment Allocation	Open Space/Leisure Amenity Allocation		Not Allocated	Settlement Boundary	Parish Boundary

\*new and extant permissions at 1st April 2020 (10 or more dwellings)

N  
 1:23,833  
 at A3  
 Date: 15/12/2020

# NOWICH (CENTRE)



- |   |                                    |   |                      |   |                       |   |                     |
|---|------------------------------------|---|----------------------|---|-----------------------|---|---------------------|
|  | Primary School                     |  | Housing Allocation   |  | Not Allocated         |  | Settlement Boundary |
|  | Primary School Catchment (2018-19) |  | Mixed Use Allocation |  | Broads Authority Area |  | Commitment*         |
|   |                                    |   |                      |   |                       |  | Parish Boundary     |

\*new and extant permissions at 1st April 2020 (10 or more dwellings)