



Planning applications committee

Date: Thursday, 21 March 2024

Time: 09:30

Venue: Mancroft room, City Hall, St Peters Street, Norwich, NR2 1NH

Members of the public, agents and applicants, ward councillors and other interested parties must notify the committee officer if they wish to attend this meeting by 10:00 on the day before the committee meeting, please. The meeting will be live streamed on the council's YouTube channel.

Committee members:

Councillors:

Driver (chair)
Sands (M) (vice chair)
Calvert
Haynes
Hoechner
Lubbock
Oliver
Peek
Prinsley
Sands (S)
Thomas (Va)
Young

For further information please contact:

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Information for members of the public

Members of the public and the media have the right to attend meetings of full council, the cabinet and committees except where confidential information or exempt information is likely to be disclosed, and the meeting is therefore held in private.

For information about attending or speaking at meetings, please contact the committee officer above or refer to the council's website



If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Agenda

Page nos

1 Apologies

To receive apologies for absence

2 Declarations of interest

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3 Minutes

7 - 10

To approve the accuracy of the minutes of the meeting held on 11 January 2024

Planning applications

Please note that members of the public, who have responded to the planning consultations, and applicants and agents wishing to speak at the meeting on the following items are required to notify the committee officer by 10:00 on the day before the meeting.

Further information on planning applications can be obtained from the council's website: <http://planning.norwich.gov.uk/online-applications/>

Please note:

- The formal business of the committee will commence at 9.30;
- The committee may have a comfort break after two hours of the meeting commencing.
- Please note that refreshments will not be provided. Water is available
- The committee will adjourn for lunch at a convenient point between 13:00 and 14:00 if there is any remaining business.

4 Application no 22/00879/F Carrow Works, King Street, Norwich

11 - 126

Proposal: Hybrid (Part Full/Part Outline) for the comprehensive redevelopment of Carrow Works. A full planning application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, (Use Class C3) of the Lodge, Garage and Gardener's Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625sqm of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works and an outline planning application for demolition of existing buildings and replacement with phased residential-led development up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or Sui Generis), (total of 9,005sqm of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access.

Ward: Lakenham

Case Officer: Sarah Hinchcliffe

Applicant/agent: Fuel Properties (Norwich) Ltd

Reason at Committee: Major development raising issues of wider than local concern

Recommendation: Refusal

Application no 22 00879 F Carrow Works, King Street, Norwich APPENDIX 1 127 - 128

Application no 22 00879 F Carrow Works, King Street, Norwich APPENDIX 2 129 - 132

Application no 22 00879 F Carrow Works, King Street, Norwich APPENDIX 3 133 - 138

Application no 22 00879 F Carrow Works, King Street, Norwich APPENDIX 4 139 - 142

5 Application no 23 01574 F 77A Vincent Road, Norwich, NR1 4HQ 143 - 154

Proposal: Change of use of first floor accommodation (C3) to mixed use (E).

Ward: Crome

Case Officer: Danni Howard

Applicant/agent: Chris Baker

Reason at Committee: Objections

Recommendation: Approval

- 6 **Application no 22/00762/F Land and Buildings, Including 70 – 72 Sussex Street & Land North Side of 148 Oak Street, Norwich, NR3 3DE** 155 - 220

Proposal: Demolition of existing structures and construction of 34 low energy cohousing dwellings and ancillary shared facilities, with associated landscaping and car and cycle parking.

Ward: Mancroft

Case Officer: Maria Hammond

Applicant/agent: Sussex Street Cohousing CIC/TOWN

Reason at Committee: Objections

Recommendation: Approval

- 7 **Application no 22/01417/F End House, Church Avenue East** 221 - 248

Proposal: Demolition of existing house and construction of replacement house and stand-alone garage (revised proposal).

Ward: Eaton

Case Officer: Maria Hammond

Applicant/agent: Mr Mike Page/Crispin Lambert, LBR Architecture Ltd.

Reason at Committee: Objections

Recommendation: Approval

- 8 **Application no 23/01620/F 25 Hill House Road, Norwich** 249 - 262

Proposal: Alterations to loft conversion (Retrospective)

Case Officer: Matthew Hickie

Applicant/agent: Mrs Louise Robinson

Reason at Committee: Called in by Cllr Joshua Worley

Recommendation: Approval

Date of publication: **Wednesday, 13 March 2024**



Planning Applications Committee

09:30 to 11:25

11 January 2024

Present: Councillors Driver (chair), Sands (M) (vice chair), Calvert, Haynes, Hoechner, Lubbock, Oliver, Prinsley, Peek, Sands (S), Thomas (Va) and Young

(The composition and membership of the committee was reviewed at an extraordinary meeting of the council (10 January 2024) and has been amended.)

1. Declarations of interests

There were no declarations of interest.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 14 December 2023, subject to deleting the reference to Councillor Ackroyd at the end of item 2, Minutes.

3. Application no 23/00479/F – Fieldgate, Town Close Road

Proposal: Demolition of existing bungalow and erection of dwelling with detached double carport/single garage.

The Planner (case officer) presented the report with the aid of plans and slides.

(During the following representations slides provided by the residents were displayed.)

Four of the neighbouring residents addressed the committee with their objections to the proposed development. These included concern about the scale and design of the proposed new dwelling and carport/garage, which was considered to have an overbearing effect on the setting of the conservation area; that the footprint of the building would exceed the existing footprint by 60 square metres and the increased hard standing on the site, with concern about the impact on the local ecology; that the visual effect of the proposal would be detrimental to the setting, heritage, and unique character of the street scene and to the houses opposite and to the east; whilst appreciative of the implementation of tree protection orders on the site, there was concern about the revised arboricultural report and damage to trees from the increased hardstanding from the proposed garage, house and heated pool, and that

planting to form screening would not mitigate visual loss from the streetscene and historic environment, particularly when viewed from the first floor of adjacent houses; that the design of the proposed house, garage, heated pool and gate was mediocre and unsympathetic to the existing street scene and character of the area.

Councillor Stutely, ward councillor for Town Close, addressed the committee and outlined his objections to the proposed scheme, on the grounds that the design was more suited to an agricultural/rural setting and not a historic city centre conservation area, that the proposal was detrimental to an area that was a haven for people and wildlife; was larger than the previous application and had greater detrimental impact; and that he was concerned that the applicant did not intend to maintain the trees and boundary hedge from correspondence circulated by the consultant; and that permission should be refused as he considered that it was contrary to local and national planning policies.

In response to the issues raised by the speakers, the planner confirmed the size and scale of the development and that the carport/garage which would be detached from the house. The footprint for this application was 60 square metres larger than the existing footprint on this site, and referring to the comparison of the carport/garage being equivalent to a small house by one of the speakers said that it was nearer to the size of a one-bedroom flat and considered acceptable. The trees protected by tree preservation orders (TPOs) were a cherry, sycamore and a hawthorn. The sycamore had been reclassified from category C to B and the arboricultural assessment had been subsequently revised and resubmitted. TPOs provided additional protection to trees in a conservation area.

The Planner, together with the Development Manager, referred to the report and answered members' questions. This included clarification that details of the hard and soft landscaping and surface water drainage would be agreed by condition. The character of the area was for open driveways and therefore the design of the gate would be included in the landscaping condition to ensure that it was of an open design that could be seen through when closed. Members were also advised that the existing planning permission on the site was a material planning consideration, as there were similarities between the two applications; and where this proposal would have no greater impact than the approved application, it would be unreasonable to refuse. The landscaping plan would ensure that the hedge was undamaged by the close board fencing and that that the planting was maintained over a five-year period. The committee also sought confirmation of the materials for construction (as set out in paragraph 21 of the report), and noted that as there was mixed development in this area, and taking account of the existing planning permission for the location of the garage, the siting of the development in front of the prevalent building line was considered acceptable. Members were advised that the proposed condition 10 removed permitted development rights to change the garage into a habitable space and this would apply for the lifetime of the development. Officers were not suggesting any changes to make the development compliant with current car parking policies. The Development Manager explained that the revised arboricultural survey had been reviewed by the council's Tree Protection Officer which had led to the conclusions as set out in the report.

The chair moved and the vice chair seconded the recommendations as set out in the report.

During discussion, members pointed out the merits of the development. This was a modern house that replaced a 1950s house, and its design and use of material complemented the surrounding 19th century dwellings. The proposal improved the thermal energy efficiency of the building and encouraged biodiversity with its bat boxes, and the use of permeable hardstanding improved its green credentials. Modern dwellings did not need to be in the same style as the existing houses.

Members who opposed the application considered that it was out of keeping with the streetscene and in the wrong location, and some members remained concerned about the preservation of the trees on this site.

Members also considered the precedence the approval of a similar application by the committee in November 2021 and that this could still be built out if this application was refused.

RESOLVED, with 7 members voting against (Councillors Driver, Sands (M), Sands (S), Thomas, Haynes, Peek and Lubbock) and 5 members voting against (Councillors Hoechner, Oliver, Calvert, Young and Prinsley) to approve application no. 23/00479/F Fieldgate, Town Close Road, Norwich, NR2 2NB and grant planning permission subject to the following conditions:

1. Standard time limit;
2. In accordance with plans;
3. Arboricultural works to be carried out by a suitably qualified arborist;
4. Works on site in accordance with arboricultural impact assessment, method statement and tree protection plan;
5. Compliance with ecological mitigation measures;
6. External materials to be agreed;
7. Hard and soft landscape scheme to be agreed, notwithstanding any details shown in application (to include gate design, boundary treatments and external lighting);
8. Surface water drainage scheme to be agreed;
9. Details of solar PV and air source heat pump, including noise, to be agreed;
10. Parking, access, turning space, cycle storage, bin storage and EV charging completed prior to first occupation;
11. Implementation of biodiversity enhancement strategy;
12. Swimming pool to be used incidental to use of dwelling only;
13. Water efficiency.

(The committee adjourned for a five minute break at this point, and with all members listed above as present reconvened.)

4. Application no 23/13232/F 72 Britannia Road, Norwich, NR1 4HS

Proposal: Single storey rear extension and alterations.

The Planner (case officer) presented the report with the aid of plans and slides. The application was being brought to committee because the applicants were close relatives of an officer and would normally have been determined under delegated powers.

The Development Management Team Leader answered a member's question about the perspective of the plans to show the roof drainage.

The chair moved and the vice chair seconded the recommendations in the report. A member who had previously lived in a same style terrace house, said that such a similar extension would have been a welcome addition to their family home.

RESOLVED, unanimously, to approve application no. 23/01312/F - 72 Britannia Road, Norwich, NR1 4HS and grant planning permission subject to the following conditions:

1. Standard time limit;
2. In accordance with plans.

CHAIR



Committee name: Planning applications

Committee date: 21/03/2024

Report title: Application no 22/00879/F Carrow Works, King Street, Norwich

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

To determine:

Application no: 22/00879/F

Site Address: Carrow Works, King Street, Norwich

Decision due by: 22/05/2024

Proposal: Hybrid (Part Full/Part Outline) for the comprehensive redevelopment of Carrow Works. A full planning application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, (Use Class C3) of the Lodge, Garage and Gardener's Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625sqm of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works and an outline planning application for demolition of existing buildings and replacement with phased residential-led development up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or

Sui Generis), (total of 9,005sqm of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access.

Key considerations: Principle of development
Housing
Employment, retail and other town centre uses
Impact on European designated sites
Heritage
Design
Transport and movement
Social and economic infrastructure
Amenity
Green infrastructure, open space and landscaping
Trees
Biodiversity
Flood risk
Development viability

Ward: Lakenham

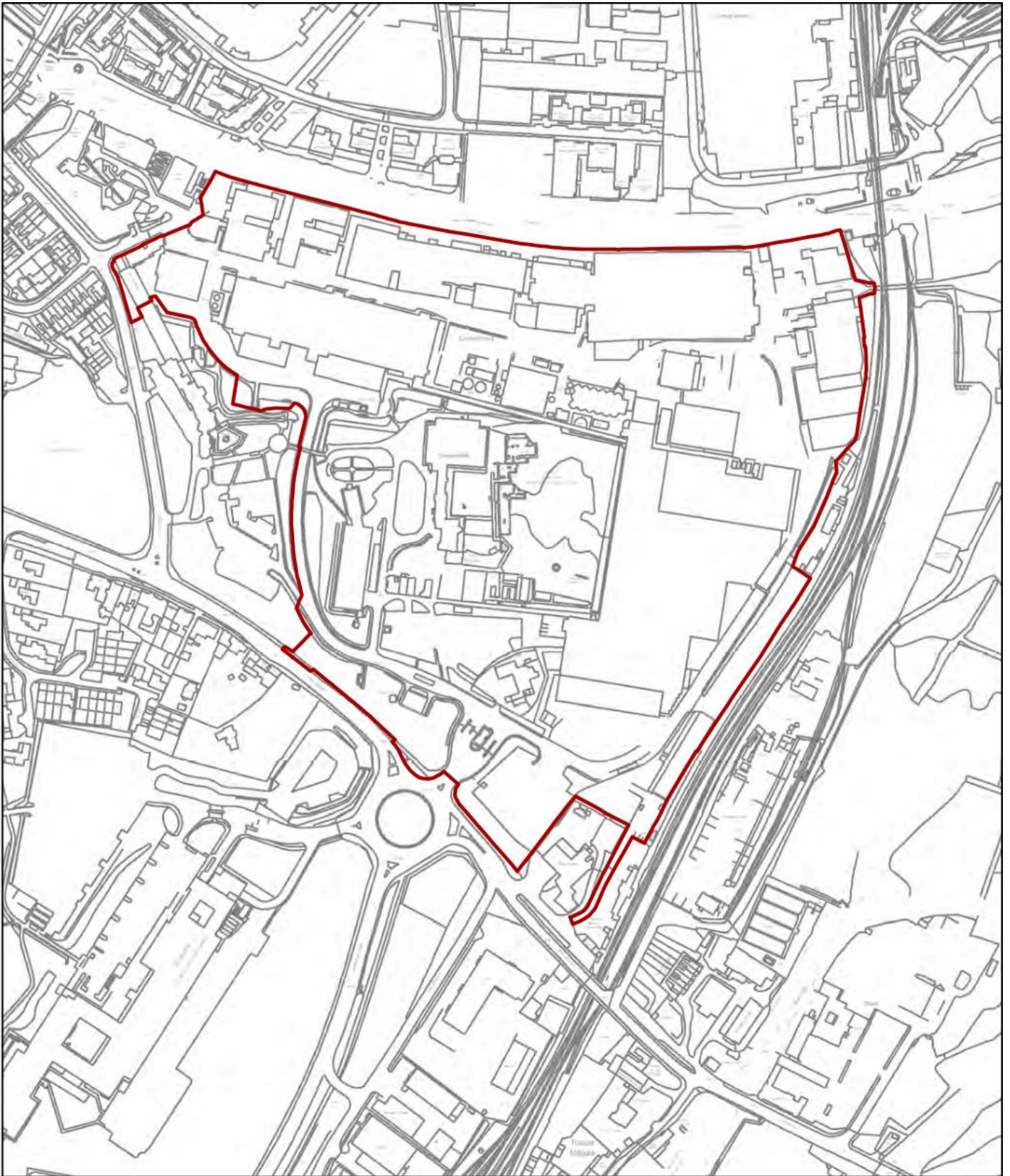
Case Officer: Sarah Hinchcliffe

Applicant/agent: Fuel Properties (Norwich) Ltd

Reason at Committee: Major development raising issues of wider than local concern

Recommendation:

It is recommended to refuse the application for the reasons given in the report.



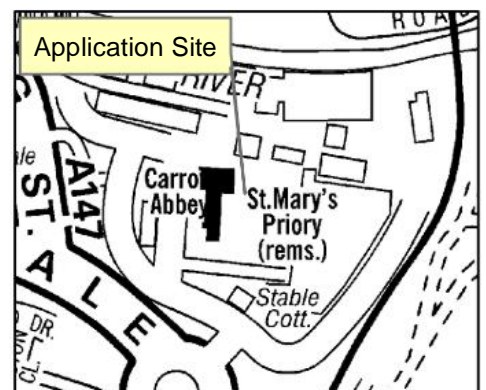
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Planning Application No 22/00879/F
Site Address Carrow Works, King Street

Scale 1:4,000



NORWICH
City Council
PLANNING SERVICES



The site and surroundings

1. The application site measures approximately 16.92 hectares and is located to the southeast of the City Centre.
2. The Carrow Works site was once home to the famous Norwich manufacturer Colman's who operated from the site for over 160 years. Over recent years Colman's became part of Unilever UK Ltd who continued to use the site as a manufacturing facility and office base alongside Britvic soft drinks, together producing condiments and soft drinks at the site until 2018/19. More recently the Abbey Conference Centre also operated from the site using space within the Abbey and utilising the dining hall of the factory.
3. At the centre of the site is Carrow Abbey (grade I listed) last used as offices/conference centre. Immediately to the east of the Abbey are the remains (exposed and buried) of a Benedictine Priory (scheduled monument), located within landscaped gardens containing many trees subject to tree preservation orders. To the south and the west of the abbey are ancillary buildings (some listed and locally listed) and car parking. Attached to the northern end of the abbey is a 1960's construction, single storey dining hall (originally built for use by factory employees). To the north and east of the Abbey and gardens and located at a much lower level are a variety of industrial buildings in which the sites various manufacturing operations took place. The buildings range in age and scale from older brick-built warehouses (up to five storeys) in the northwest alongside the river (some of which are listed), to a single remaining brick chimney stack, with more modern metal framed and clad warehouse buildings to the east of the site.
4. The site is now largely vacant, although a small number of new businesses are located within the larger more modern warehouses to the east of the site, adjacent to the railway line.
5. To the north of the site is the River Wensum and beyond this on the north bank of the river are relatively new flatted residential developments (between 5 and 10 storeys high) around the Carrow Road football stadium, located off of Geoffrey Watling Way. Norwich Railway Station is less than 1 km to the north of the site.
6. To the east of the site is the main Norwich to London railway line. Trowse swing bridge takes the railway line over the River Wensum and is located adjacent to the north west corner of the site.
7. Further to the east beyond the railway line is the Deal Ground development site. This site has the benefit of an outline planning consent for up to 670 dwellings along with commercial uses. A reserved matters application for this site is currently with the local planning authority for determination. An underpass beneath the railway links the application site to the Deal Ground and is in the ownership of a third party (Network Rail). Carrow Works, the Deal Ground and May Gurney sites and the Utilities site on the north side of the River Wensum together form the East Norwich Strategic Regeneration Area (ENSRA) in the Greater Norwich Local Plan (GNLP). See map at Appendix 1.
8. To the east of the railway but further to the south is the Trowse asphalt plant operated by Tarmac and a railhead operated by Network Rail. The railhead mainly deals with the import and export of aggregates, some of which are used

by the asphalt plant, and some are transported direct from site for use in construction projects.

9. To the west of the site is Carrow House and grounds surrounded by landscaped grounds and car parking areas. The grade II and II* buildings and more modern office accommodation adjacent have had a light refurbishment in order to support temporary office use whilst redevelopment proposals are formulated for the site. This site is owned by Norwich City Council.
10. To the south of the site is the roundabout at Martineau Lane/Bracondale which provides direct access to the site and also County Hall further to the south. Bracondale (A1054) and Martineau Lane (A147) feed into the roundabout and form part of both the inner and outer ring road at this point and together provide the main route into and out of the city from the Southern Bypass and A47.

Constraints

11. There are a number of constraints associated with the site as set out below;

- Scheduled Ancient Monument (covering the area of the Abbey and Priory remains)
- Area of Main Archaeological Interest
- Bracondale Conservation Area (covering the area of Carrow Abbey and Priory and ancillary buildings in the vicinity, older buildings in the north west corner of the site and land and buildings to the west of the access drive).
- The site contains a number of statutorily and locally listed buildings as follows;
 - a) Carrow Abbey (Grade I)
 - b) Lodge, gardeners cottage and former cart shed (Grade II)
 - c) Mustard seed drying shed (Grade II)
 - d) K6 Telephone Kiosk outside entrance of former mustard seed drying shed (Grade II)
 - e) Flint wall and 19 attached pet tombs (Grade II)
 - f) Walls, steps and paved surfaces of sunken garden near Carrow Abbey (Grade II)
 - g) Eastern air raid shelter (Grade II)
 - h) Block 92 (Grade II)
 - i) Blocks 7, 7A, 8 and 8A including metal canopy attached to Block 7 (Grade II)
 - j) Stable Cottages (Locally listed)
- Listed buildings and designations on adjacent sites;

- a) Carrow House (Grade II)
 - b) Conservatory at Carrow House (Grade II*)
 - c) Trowse Railway Station (Grade II)
 - d) Late C19 engine house at Trowse Sewage Pumping Station (Grade II)
 - e) Early C20 engine house, boiler house and coal store at Trowse Sewage Pumping Station (Grade II)
 - f) Timber-drying bottle kiln *on Deal Ground* (Grade II)
 - g) Trowse Millgate Conservation Area
 - h) Crown Point Registered Park and Garden
- Carrow House and Abbey Grounds unregistered historic park and garden of local significance
 - Open space – private park and garden Carrow Abbey
 - Tree Preservation Order – numerous individual and group preservation orders
 - Employment Area – Carrow Works
 - Gateways to the City – Trowse Swing Bridge
 - Flood Zone 2 – small area in north east of the site
 - Flood Zone 3a – small area in north east of the site
 - Adjacent to city centre air quality management area (AQMA)

Relevant Planning History

12. The records held by the city council show the recent planning history for the site relates to management of the TPO trees and trees within a conservation area.

Case no	Proposal	Decision	Date
22/00540/EIA2	EIA Scoping Request for mixed use re-development at Carrow Works	EIASCR	26/05/2022

With the exception of the above submission the remainder of the planning history relates to the former employment use of the site and is not directly relevant to the development proposals.

The Proposal

13. The application proposes demolition of many of the existing buildings on the site and a mixed-use redevelopment scheme including up to 1,859 dwellings

and up to 26,630 sqm Gross Internal Area (GIA) of flexible use commercial, business, service, local community and learning floor space.

14. The entire application is submitted as a 'hybrid' planning application. The change of use of the listed buildings and provision of public spaces and public realm along the main site access road, along with establishing principal means of access are parts of the application for consideration in 'detail'. In addition demolition works to the dining hall and construction of 9 new dwellings in its place and extensions to building 209 (an unlisted non-designated heritage asset located along the riverside) are physical works proposed, with the remainder of the development proposals submitted in 'outline'.
15. The outline part of the planning application, with some matters reserved includes consideration of the principle of relevant demolition of unlisted buildings in a conservation area and their replacement with a residential led mixed-use development. The outline planning application is supported by a series of Parameter Plans, including the Hybrid Planning Application Boundaries, Demolition, Land Use, Open Space, Building Heights and Access and Movement plans.
16. In addition, in relation to both the full and outline components of the hybrid planning application, the proposal is the subject of an overall indicative masterplan and a Design Code and Design and Access Statement, which defines a series of character areas across the outline component of the site.
17. There are numerous supporting technical reports and as the application has previously been identified as Environmental Impact Assessment (EIA) development for which a requirement of the submission is the provision of an Environmental Statement (ES).
18. Despite attempts to secure such information to form a valid submission, there are currently no associated listed building consent applications with the local planning authority for works to the listed buildings which form the full/detailed part of the planning application submission.
19. It is also understood that some of the works proposed will require Scheduled Monument Consent from the Department for Digital, Culture, Media and Sport (DCMS), via a process where Historic England provide advice to the government. At this time, it is understood that no such submission is with the relevant authority for determination.
20. The planning application has been with the local planning authority for some time. The initial submission was made in July 2022 and remained invalid due to awaiting further information to allow consultation and consideration of the application to begin. After a significant period in which attempts were made to engage with the applicant to understand the delays, the outstanding documentation was provided, and the application was validated in August 2023 (just over 1 year later). The application has been considered in the extremely disappointing context that since its initial submission the applicant and their project team have not been in a position to discuss, negotiate or amend their proposals in any way. This situation is reflected in the significant number of objections and comments of concern from a large number of the consultees as summarised in the 'statutory and non-statutory consultees' section from paragraph 30 onwards.

21. As progress on this matter remains lacking, a decision has been made by the Head of Planning and Regulatory Services to present the application to members for consideration.
22. The content of the report therefore reflects this unusual, extremely unfortunate and disappointing situation and highlights areas where information is absent or deficient. The report should also be considered in the context that due to the passage of time some of the technical reports may not reflect an up-to-date position with regards to the site and surrounding baseline or relevant guidance and legislation.

Summary of Proposal – Key facts:

23. The key facts of the proposal are summarised in the tables below. Note that the quantum of development stated are maximum figures and indicative in respect of the outline elements of the proposal.

Scale	Key Facts
Residential	
Total no. of dwellings	1,859
No. of dwellings (Full)	Up to 143 units.
No. of dwellings (Outline)	Up to 1,716 units
No. of affordable dwellings	Nil
No. of dwellings meeting Part M4(2) Accessible and Adaptable Dwellings	Suggests an aim to achieve 20%
Commercial	
Total amount of commercial floor space	26,630 sqm (GIA)
Commercial floorspace (Full)	17,625 sqm
Commercial floorspace (Outline)	9,005 sqm

Appearance	Key Facts
No. of storeys	Height parameters range between 1 and 14 storeys. Areas of greatest height along River Wensum.
Principal materials	Buff brick, grey brick, red multi brick, metal cladding

Transport Matters	Key Facts
Vehicular access	From Martineau Lane/Bracondale roundabout and new access from Bracondale.
Pedestrian and cycle access	As above and also via Papermill Yard and King Street and Bracondale adjacent to Carrow Fire Station. Note Also suggested access via a new bridge link over the River Wensum and via an underpass beneath the railway to the adjacent Deal Ground, although arrangements for such are not confirmed.

	Use of an existing pedestrian bridge access to Carrow House site (subject to agreement with adjacent landowner, not confirmed).
No of car parking spaces	734
No of cycle parking spaces	Suggest will be in accordance with development plan policy.

Indicative dwelling mix from planning statement – 72% apartments – 28% houses

	Apartments – Private sale	Apartments – Build for Rent	Houses	TBC
1 bedroom	355	217	1	
2 bedroom	540	227	78	
3 bedroom			267	
4 bedroom			30	
5 bedroom			7	
TBC			12	125
	895	444	395	125

**table below suggest the TBC element has been assigned to flats*

Indicative dwelling mix – from viability report

	Flats	Houses	Total
1 bedroom	618		618
2 bedroom	846	78	924
3 bedroom		283	283
4 bedroom		29	29
5 bedroom		5	5
Total	1,464 (79%)	395 (21%)	1,859

Detailed element

24. The full planning application relates to an area covering 5.02 hectares (approximately 30% of the total site area). The description relating to the detailed element of the proposals is as follows;

“full application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, up to (Use Class C3) of the Lodge, Garage and Gardener’s Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625 sq.m of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works”.

25. The main elements are summarised below;

- Access and the main internal estate road and public spaces and public realm.
 - a) the existing access from the roundabout at the junction of Martineau Lane and Bracondale is to be retained and modified.
 - b) a new point of access is proposed on to Bracondale
 - c) emergency access from the southeast corner of the site emerges onto Bracondale adjacent to Carrow Fire Station.
 - d) existing access road around the development is to be retained and upgraded to an adoptable standard, (although will likely remain unadopted by the highway authority),
- Conversion works and change of use of Carrow Abbey (grade I listed) to 3 residential dwellings,
- Conversion works and change of use of the Lodge, Garage and Gardener's Cottage (grade II listed) to 3 residential dwellings,
- Conversion works and change of use of Stable Cottages (locally listed) to residential use,
- Demolition of the former dining hall and construction of 9 new residential dwellings,
- Adaptation and conversion of buildings 92, 7, 7a, 8 and 8a, 35 (mustard seed drying shed) (all grade II listed) for flexible uses to include;
 - a) Business and commercial, hotel or, dwellinghouses.
- Adaptation and conversion of buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35 and the chimney for flexible uses to include;
 - a) Business and commercial, hotel, residential institution, dwellinghouse, learning and non-residential institutions, local community uses, general industrial, storage and distribution or sui generis uses.
 - b) Proposed plans for building 209 include substantial extensions, including the provision of additional storeys.
- Adaptation and conversion of the retained workshop (Block 258) for flexible uses to include;
 - i. Business and commercial, general industrial, storage and distribution or sui generis uses.
- In total providing 143 residential units and/or 17,625 sqm of flexible commercial business, service and local community and learning floorspace.

Outline element

26. The outline planning application relates to an area covering 11.9 hectares. The description relating to the detailed element of the proposals is as follows;

“demolition of existing buildings and replacement with phased residential-led development up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or Sui Generis), (total of 9,005sqm of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access”.

27. More concisely this includes an indicative mix of;

- 395 market houses,
- 895 market apartments,
- 444 build to rent apartments,
- 125 TBC (assumed apartments),
- 9,005 sqm (GIA) flexibles uses to include; Business and commercial, hotel, residential institution, learning and non-residential institutions, local community uses, general industrial, storage and distribution uses.

Representations

28. Adjacent and neighbouring properties have been notified in writing. 3 letters of representation have been received citing the issues as summarised in the table below:

Issues raised	Response
The proposed heights of buildings are imposing and out of character.	See main issues 5 and 6 in relation to consideration of building heights and heritage impacts.
The application does not comply with the East Norwich masterplan requirement for a direct cycle route east to west through the site.	See main issue 7. Although provision is made for an east to west route through the site the detail of its arrangement and design still needs to be discussed.
A bridge across the River Wensum to allow safe and direct access to the city centre should be provided.	Agree. See main issue 7.
A bridge over the River Yare is needed to provide safe access to Whitlingham Country Park.	Agree. See main issue 7.
Improvements to the underpass must be made to allow for a walking and cycling route under the railway.	Agree. See main issue 7.
There will be a significant increase in traffic on the outer ring road.	See main issue 7. There remain outstanding issues with the detailed content of the Transport Assessment.
Road junctions surrounding the site are dangerous for cyclists. Safe and segregated cycle routes through the site are required.	See main issue 7. There remain outstanding issues with the detailed content of the Transport Assessment and the mitigation measures required.

Consultation responses

29. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Statutory and non-statutory consultees

Active Travel England

30. A large amount of further information is required. A comprehensive Transport Assessment (TA) and Travel Plan which incorporates a definitive walking and cycling strategy should be submitted. Currently the trip forecasts in the submitted TA do not represent a sound basis upon which to forecast the needs for active and sustainable travel, nor do they demonstrate a commitment to improving and enhancing active travel networks that serve the site. The TA and Travel Plan should identify infrastructure to be provided which enhances the accessibility of the site.
31. It is strongly recommended that the Local Planning Authority consider requiring that the number of vehicular parking spaces is significantly reduced.
32. It is noted that the site is located very close to Carrow Road (Norwich City FC) which frequently attracts between 25-30,000 supporters during the football season. Regardless of whether the internal roads are privately managed or adopted by the highway authority, it is considered that unless restrictive parking measures are implemented through a Controlled Parking Zone (CPZ) or other privately managed residents only parking restriction, the site, and its internal streets could become an attractive parking opportunity for spectator overspill parking, generating obstructions to active travel routes, crossing points, and causing hazards and inconvenience to walkers, wheelers, and cyclists.
33. The number of both long-stay and short-stay cycle parking facilities needs to act as a suitable encouragement to shift to active and sustainable modes. Suggested cycle parking provision:
- 3,346 long stay cycle parking spaces (total number of bedrooms – one space per bedroom).
 - 133 – 266 long term cycle spaces for associated uses (26,630m² of flexible range of uses – precise number of spaces to be calculated by the applicant in future submissions).
 - Up to 266 short term spaces for above mixed-uses.
34. It is crucial that the development proposals align with the strategies set out in the Greater Norwich LCWIP, in support of Norfolk County Council's ambition to make Norfolk a walking and cycling county where walking and cycling are the natural choice for all types of users for both travel and leisure in both rural and urban areas. Therefore, this applicant must demonstrate an absolute commitment to the expansion of active travel routes.

Ancient Monuments Society (Historic Buildings and Places)

35. Object to the construction of nine new units on the site of the dining room. The fact that there have been past changes and a building in this location should not be taken as justification for further accretions which would continue to erode and encroach on the setting of Carrow Abbey and Carrow Priory.
36. Concern about the apparent division of the garden to the east of the Abbey for what appears to be individual private gardens. The subdivision would interrupt this connection, both visually and physically, again adding further harm to the setting and historic interest of both structures.

Anglian Water (AW)

37. No objection subject to imposition of conditions. Confirm that there are AW assets within and close to the site. In relation to wastewater treatment, they indicate the foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have available capacity for these flows. Conditions are recommended regarding on-site drainage and surface water disposal.

Broads Authority

38. Some concerns relating to the proposed building heights of 8-11 storeys along most of the river frontage. This is a substantial increase in height and although the historic character was described as canyon-like in the conservation area, that was describing buildings of five storeys. We would therefore suggest that further consideration is given to this scale.
39. Also suggest that there should be some variety in the river-facing elevation in terms of heights and roofscape. We also have concern relating to the 11-14 storey block at the eastern end of the site, where its relationship to the more rural areas to the east needs to be considered as much as its relationship to the built form of the city.
40. In terms of landscaping, it is beneficial that a riverside walk is being proposed and that there will be pedestrian and cycle links into the neighbouring Paper Mill Yard site to the west. We suggest that it would be positive if both the landscape scheme and building design, particularly along the sensitive river frontage, could aim to reflect and retain something of the site's industrial heritage.

Broads Society

41. Generally supports the principle of the redevelopment of the Carrow Works site, especially the retention of the important historic and heritage assets of the site. However, there are some strong reservations about the scale and form of the indicative residential blocks fronting the river in the outline part of the application. It is anticipated that, if developed in the form indicated, that the proposed residential blocks will have a very dominant and shadowing effect over both the river and the green space proposed between the built form and the river.
42. There is also considerable concern about the limited amount of open and landscaped space between the buildings fronting the river and the river's edge.

Cadent Gas

43. No objection in principle from a planning perspective. Informative note required.

Design and Conservation (Norwich City Council)

44. The tangible and intangible cultural heritage comprising the site are significant factors which should be some of the primary considerations for any development proposals within the application area.
45. The principle of creating a distinctive, sustainable and heritage-led development, and the opportunity to open up this historically significant part of the city to the public is strongly supported. However, the proposed development is believed to cause a high level of harm to the significance of designated heritage assets and their setting. The proposed subdivision of Carrow Abbey and its grounds, and introduction of residential development over the ruins of Priory church would affect the evidential, historic and communal values of the monument and Abbey, and their strong interconnectedness. The accumulated harm on the significance of designated heritage assets (including the scheduled monument, grade I listed Abbey) and their setting is considered to be at the upper end of less than substantial harm.
46. Paragraph 203 of the NPPF highlights the importance of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Based on the submitted information and potential level of harm, it is hard to justify that the proposal presents the optimum viable use for the grade I listed Abbey and its immediate setting considering the necessary changes that are suggested to accommodate the proposed use. It is important to ensure that the viability of the use is considered for the future conservation of the asset, as well as its economic benefits. The submitted Technical Appendix 14.1 fails to justify why the proposed development (encompassing subdivision of the Abbey into separate units, associated internal and external works, including additional residential development over the ruins of the Priory church) is suggested as the optimum viable use for the future of this significant historic site.
47. The scheme cannot be supported on conservation and design grounds as the range and character of interventions raise significant concerns regarding the viability of the proposed use within this historic setting. Paragraph 208 of the NPPF says that '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*' The proposal would negatively impact the significance of designated heritage assets and their setting, and the way they are perceived and experienced. It is recommended that options are reviewed where other uses are considered so that the Carrow Priory and Abbey, alongside ancillary buildings are preserved and re-used in a manner consistent with their significance and conservation.
48. Paragraph 212 of the NPPF says that Local Planning Authorities 'should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.' It further advises that proposals preserving 'those

elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

49. There are concerns on the wider heritage impact of proposed interventions, including development's heights and footprint, street scene, transitions between character areas, and a more detailed scheme proposal would be necessary for the listed buildings located at the north-west area of the site.
50. The group value of heritage assets within the site boundaries, and the integration of their interconnection within the network of new development should be further explored. It is recommended that the integration of this previously enclosed application site to the city's public realm should explore the adaptation of the site to the wider historic city context and infrastructure.
51. At this stage there are significant concerns, and a review of the scheme is recommended.

Ecology (Norwich City Council)

52. The PEA is an initial ecology report with good advice and recommendations. However, it does not provide sufficient information to enable an assessment of the potential ecological impacts of the development proposals. It does not provide enough evidence to assess the likely negative effects on protected species and does not include an assessment of biodiversity net loss/gain. Further surveys, and ecological assessment are required along with a Construction Environmental Management Plan and Biodiversity impact Assessment.

Emergency Planning

53. No further questions or issues with the development progressing.
54. The Flood Risk Assessment is comprehensive and has identified all forms of flood risk and recommended specific mitigating actions including raising the ground levels at most at risk sections of the development.

Environmental Protection (Norwich City Council)

55. Objection. The details within this report are lacking with regarding the noise impacts on the proposed residents, there is insufficient information/evidence that the operation of the rail head and the tarmac site adjacent would not impact on the residential amenity of the proposed residential development.
56. Objection, due to insufficient information. Due to the scale of the development, there is the potential for significant adverse effects to arise from the development in regard to air quality. The operation of the aggregate railhead and Tarmac plant on the adjacent site to the east should be considered under the key issues section, as should any additional pollution sources which may be introduced as a result of any new employment aspects of the development which could affect NO₂ or particulate levels and emissions of pollutants from all construction plant. Consideration also needs to be given to cumulative air quality impacts.
57. Access into some areas of the site was restricted due to buildings, roads and services. It is recommended that once structures have been demolished and

hard standing removed, formation inspections and further intrusive investigations (trial pits) are undertaken. Following the additional investigations, remediation strategies to mitigate risks to the proposed development from identified contamination may need to be prepared.

58. As there is not a full account of the contamination on site a full contaminated land condition is required to ensure that the pollutants and contamination pathways have been fully considered to enable the site to effectively be remediated.

59. Various planning conditions would be required concerning ground contamination, lighting and demolition.

Environment Agency

60. The Flood Risk Assessment (FRA) has not demonstrated that compensatory flood storage can be provided on the site and has not followed the Sequential Approach

61. The FRA has amended our Norwich 2017 modelling, but it has not been submitted for review by our modelling team to ascertain whether it is accurate and fit for purpose.

62. The FRA has not confirmed whether they propose land raising and development within Flood Zone 3b.

The Gardens Trust and Norfolk Gardens Trust

63. While the principal of redevelopment on this site is supported, there are strong objections to some aspects.

64. Strongly objects to the provision of housing development, associated curtilages and car parking in what is described as the Abbey Grounds part of the site. These elements would be close to the Abbey buildings and the remains of the Abbey, resulting in an adverse effect on their settings. To fully respect the heritage assets in this part of the Carrow site it should instead be used as an open park, enlarging the Abbey Gardens. This would both improve the setting of the Abbey and be a major benefit to new residents and the wider public.

65. The proposed housing immediately to the north of the Abbey buildings is not appropriate. While it would replace the modern dining hall, it would be too close to the Abbey remains and have an adverse effect on their setting. These buildings would, in part, be on the site of the nave of the former priory church. The foundations of the dining room were designed to avoid harm to the archaeological remains of the church. This redevelopment provides a unique opportunity to reclaim the site of this key building in the area's historic development. This area should remain undeveloped as part of the park referred to above, with appropriate interpretation to further public understanding of this highly important site.

66. The sub-division of the Abbey buildings would require the provision of garden areas for the proposed houses, resulting in sub-division of the area of the Scheduled Ancient Monument. The Heritage section of the Environmental Assessment acknowledges that this would be harmful to the Abbey site. The Trust shares that conclusion and objects to this part of the proposals. A

community use for the Abbey buildings would obviate the need for domestic gardens. Extensive housing development is also proposed to the east of the Abbey grounds. Careful control of its height will be needed to avoid harm to views from within the grounds.

67. This is a hybrid application, part outline and part detailed. Given the great importance of the heritage assets at Carrow, the Trust does not consider an outline application to be appropriate for any elements of the development which would affect those assets.

Health and Safety Executive

68. The proposed development site does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline.
69. **Comments relating to building 209 (9 storeys 30.17m).** There is currently insufficient fire safety information to enable HSE to make a full comment. Further information is required relating to the fire service site plan and the proposed plans for the basement of the building.
70. Further comments relate to fire hazards associated with habitat or green roofs and electric vehicle/cycle storage safety considerations.

Highway authority (Norfolk County Council)

71. The Highway Authority is supportive in principle of sustainable development at the former Colman Works site. However, unfortunately the Transport Assessment (TA) provided with the application in the opinion of the highway authority is deficient in a substantial number of areas. It fails to demonstrate an acceptable access strategy, justify development trips, provide full traffic flow diagrams, assess development impact, identify appropriate off-site highway mitigation. The Transport Assessment also includes assumptions based upon delivery of infrastructure that is dependent on third party land.
72. The provided Transport Assessment fails to demonstrate that the highway network would continue to operate safely without severe residual cumulative impact. The Highway Authority would therefore in accordance with NPPF paragraph 115 recommend refusal of the application.

Historic England

73. Objects to the application on heritage grounds because of the high level of harm that would be caused to the significance of the scheduled monument, grade I listed Carrow Abbey and other listed buildings on the site.
74. We have serious concerns about the proposal to replace the dining room with residential dwellings. Any new-build structures on the floor slab of the dining hall would have an adverse impact on the setting of the scheduled monument and cause harm to its significance.
75. The subdivision of Carrow Abbey would mean the building could no longer be appreciated as a single property. Much of the Abbey's architectural and historic interest lies in the high survival of late Victorian and Edwardian fabric and the plan form. The division of the house would limit the ability to appreciate its plan

form and the quality of the rooms and fabric which collectively illustrate a high-status domestic property of this period.

76. The proposed extension at the northern end of the Abbey would harm the significance of the building. It is higher than the existing link at two storeys and would obscure more of the exceptional flint work identified in the Design and Access Statement.
77. The proposed development in the area between the historic ancillary buildings on the approach to the Abbey would harm its significance and that of the monument. Carrow Abbey was designed as a home for the Colman's within a garden setting. While the garden setting has been eroded by car parking in this area it has remained open. This also allows for a visual connection between these buildings and Abbey House and contributes to the significance of the buildings.
78. The visibility of the taller new buildings within the Abbey site would harm its secluded and domestic character.
79. A three storey roof top addition is proposed to building 209 on the water front. Taller new buildings here could detract from the significance of the historic industrial buildings.

Development strategy (Norwich City Council)

80. The development strategy team are keen to see the redevelopment of this large brownfield site, however, have some concerns relating to the current proposals which would lead to our objection on 2 grounds:

Affordable Housing

81. The site area and the proposed number of dwellings triggers the thresholds of the Council's affordable housing (AH) policy. All developments are expected to deliver this policy requirement unless an acceptable independent review of viability determines that it is not viable to deliver the full quota.
82. The Greater Norwich Local Plan (GNLP), has a requirement for 33% affordable housing currently going through the formal process of adoption by each of the Local authorities. It is anticipated that adoption will be completed by the end of March 2024.
83. The tenure of affordable housing is determined by the 2021 Local Housing Needs Assessment and shows a requirement for 65% affordable housing for rent and 35% for low-cost home ownership (shared ownership, shared equity, or any other intermediate product)
84. In this instance 613 units of affordable housing would be required. 399 affordable housing for rented and 122 low-cost home ownership.
85. It is very disappointing to see that the applicant is not proposing to deliver any AH on the grounds of viability, and we would therefore object to the application on this ground.
86. In our opinion a development of this scale would need to provide a level of affordable housing in order to deliver a mixed and balanced community. A review of viability has been provided by the applicant that indicates the scheme

would not support affordable housing, but in order to fully assess this we would expect an independent review of this and consideration of potential grant funding that could improve the viability.

87. If, as a result of the independent review of viability, AH is deliverable, it should be secured by a S106 agreement. It should be of tenure neutral design and should be integrated into residential layouts to provide a distribution of single units or small groups rather than in one large group. In Norwich there is a high need AH, particularly 1-bedroom 2-person flats, 2-bedroom 4-person houses and 4+bedroom houses. If it is deemed that any AH is viable, I would suggest further discussions are held to determine the size and locations of the units.

Housing Mix

- The annual housing need across Norwich, as determined by the LHNA, is for 593 homes of which 25% would be apartments and 75% houses.
- It is recognised, due to the nature of the development and existing buildings that there will be a requirement for a higher density scheme on Carrow Works.
- In our opinion, however, the current property mix is not reflective of either the housing need or the masterplan for the development and proposes only 21% houses and 79% apartments.
- The masterplan shows a range of heights across the development with high rise up to 11 storeys to the North but lower density of 2-3 storey to the South and East of the site.

88. Recognising that the application is a hybrid application further detail will be required on the accommodation schedule in order to ascertain whether the proposed dwellings meet the Nationally Described Space Standards size requirements.

89. Whilst there is some communal outdoor space, it would be good to see some private outdoor space and/or balconies for use by the residents.

90. The energy strategy indicates that passive design measures, well insulated and airtight building fabric (Future Homes Standard as a minimum) and proposes to utilise measures such as PV, solar thermal and heat pumps which is welcomed.

91. The site is within reasonable proximity of the shopping centre at the Riverside Retail Park which provides a range of shops including a supermarket, and it is not far from Whitlingham Country Park which provides recreational facilities. It is a short bus journey to the centre of Norwich where there is a full range of amenities and educational facilities.

Landscape (Norwich City Council)

92. Holding objection on landscape for the site based on a general lack of coherent approach to the landscape strategy. Whilst some of the individual elements and approaches to different character areas might be justified, it is difficult even within the design code to understand if a strong coherent design thread is provided across the entire development area.

93. There are several areas which would benefit from being included as a full application, this is the case where access, links and open space should be

strongly aligned in terms of strategy and more detail needs to be demonstrated in order to understand how realistic the ideas presented are. This is particularly the case where there are level differences to overcome. If connections are not possible it would really undermine the ability for this site to connect to its surrounding both physically and in terms of character and sense of place. Applications relating to nearby sites (Deal Ground and Tarmac depot) also need consideration in terms of wider links.

94. In landscape terms, what this site requires is a strong approach which protects existing features and works them into a usable public landscape framework, combined with a strong access strategy. The potential pressures that would be placed on both onsite and offsite/nearby landscapes (including protected/designated sites) needs consideration. The approach to providing adequate onsite GI and recreation space should be fully justified.

95. Initial points of detail around a number of elements of the proposals. Including;

- a secondary access is proposed from Bracondale which would require removal of existing mature trees, and attractive flint boundary wall, and would interrupt the existing cycle/footpath. This would have adverse landscape and visual effects causing harm to the Bracondale Conservation area and would reduce the accessibility of the cycle/ped facility, which is unlikely to be acceptable in landscape terms without adequate mitigation.
- The riverside walk needs to follow the frontage of building F (Block 7/8) to avoid a lengthy diversion around three sides of the block in order to return to the riverside walk. Options seem to be either a cantilevered walkway or a route through the building.

Lead Local Flood Authority (Norfolk County Council)

96. In consideration of the sequential test, sequential testing does not consider it acceptable for residential properties in the 'more vulnerable' or 'highly vulnerable' class to be built in Flood Zone 3b. In addition, as the applicant has not secured suitable flood storage compensation within the redline boundary of the site, it would not be possible to raise the ground levels in the area of the site in Flood Zone 3 to enable development on this land without increasing flood risk on site or elsewhere. No exception test has been undertaken for this area of the development in accordance with NPPF.

97. The applicant will need to assess the existing attenuation capacity on site and ensure that the proposed development does not increase flood risk elsewhere through not considering this matter thoroughly.

98. There is a lack of consideration of the surface water connectivity between the Carrow Works site and the land to the east of the railway line through the underpass. At present, the surface water mapping (which is based upon ground level mapping) indicates there is the potential for water to pass through the underpass. This could also be a potential route for water during fluvial flooding, which has also not been assessed or considered despite the evidence indicating its potential.

99. There has been very limited consideration of sustainable drainage systems and the reporting of reusing existing infrastructure that is not even confirmed as operable let alone viable is inappropriate. The use of a controlled discharge

rate limited to a 1% AEP greenfield runoff rate implies the proposed use of a complex control system yet there is no consideration of where the long term storage will be provided on site for each of the affected networks.

100. Further detailed critique around specific elements of the Flood Risk Assessment and Drainage Strategy are contained within the full comments available to view on the council's website.

Natural England

101. Further information required to determine impacts on designated sites and protected landscapes.

102. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

103. The following information is required:

- A Habitats Regulations Assessment (HRA) – It should include an appropriate assessment for nutrient impacts and recreational disturbance.
- A nutrient neutrality assessment and mitigation strategy.

Without this information, Natural England may need to object to the proposal.

104. This development falls within the 'Zone of Influence' (Zoi) for one or more of the European designated sites scoped into the Norfolk GIRAMS. All Norfolk LPAs are collecting a tariff of £210.84 per new dwelling towards the strategic mitigation package, at the time planning permission is approved. It is Natural England's advice that your authority should consider through an Appropriate Assessment whether this development qualifies for collection of the tariff if planning permission is granted.

105. Through the GIRAMS there is a requirement to deliver additional quality green infrastructure (GI) at a local level. In line with policy 3 of the Greater Norwich Local Plan all proposed residential development should provide GI equating to a minimum of 2 ha per 1000 population. The application does not satisfy this requirement in terms of the area proposed, its accessibility to all, nor is its design or placement within the site well designed to meet the recreational needs of the residents, including dog walking.

Sites of Special Scientific Interest (SSSI)

106. Natural England advise that the submitted ecological appraisal is revised to include Eaton Chalk Pit SSSI and assess the proposed development's impact on its interest features. Yare Broads and Marshes SSSI is a component SSSI of The Broads SAC, and an assessment of any potential impacts on this SSSI needs to be considered when an HRA is undertaken.

Network Rail and Tarmac Ltd

107. Object, the proposals have the potential to introduce sensitive uses, which have not yet been appropriately and robustly assessed and insufficient detail has been provided regarding mitigation, phasing, and design parameters, such

that the proposals could prejudice the future operation of Trowse Railhead and Depot.

108. Network Rail is concerned with ensuring that any new development coming forward in the vicinity of the Trowse Aggregates Railhead Depot does not prejudice its future operation or has the potential to place additional constraints or limitations on their activities and those of Tarmac. The approach is underpinned by the Agent of Change Principle in the NPPF.
109. Network Rail is concerned about potential impacts on Norwich Station passenger capacity that may arise from the development.
110. We could not find any mention of a travel demand forecast for Norwich Station within the Transport Assessment. The Transport Assessment should quantify the trip mode share assigned to rail travel for the residential and workspace populations of the development, along with increases arising from Active Travel improvements.
111. In addition, Network Rail is concerned about active travel connectivity between the site and Norwich Station. Connectivity relies upon the completion of new connections across the River Wensum and with routes on the north side of the river. Without these improvements, active travel options between the site and the station would be restricted by topographical constraints.

NHS Norfolk and Waveney Integrated Care System (ICS)

112. Seek contribution towards the costs of mitigating the impact of the development.
113. It is noted that this application is for one phase of a larger regeneration project including many more dwellings. This specific proposal comprises a development of 1859 residential dwellings in total, with a population growth of circa. 2650 additional residents in terms of net gain in population (allowing for movement in and out of the area), which will have an impact on the NHS funding programme for the delivery of healthcare provision within this area and specifically within the health catchment of the development. The ICS would expect these additional impacts to be fully assessed and appropriately mitigated.
114. The proposed development will have an impact on the services of local GP practices, Acute healthcare, Mental healthcare, Community healthcare and the Ambulance service operating within the vicinity of the application site.
115. The proposed development would have an impact on healthcare provision in the area and its implications, if unmitigated, may be unsustainable. In order to be considered under the presumption 'in favour of sustainable development' advocated in the National Planning Policy Framework, the proposed developments should provide appropriate levels of mitigation.
116. The practices closest to this development and therefore the primary healthcare services directly impacted by the proposed development, and which will be required to manage the extra primary care demand placed upon it from this development are: Lakenham Surgery and the Tuckswood branch of Castle Partnership. Data suggests that these GP practices are already or close to being oversubscribed for patient registrations. New registrations from this

development alone will add to capacity issues in this area. Further healthcare providers will also be impacted, with the community services being provided out of the Tuckswood surgery clinic and Norfolk and Norwich Hospital services running out of both Lakenham and Tuckswood surgeries.

117. Developer contributions via CIL or S106 will be required to mitigate the impact this development will have on the local healthcare services and ensure the equitable access to high standards of health and social care can be met. This development forms only a proportion of planned growth in the area which will result in a greater impact to healthcare than has been displayed in this response.
118. The ICS strategic estates acknowledges and welcomes the inclusion of Provision of land for a health facility sufficient to serve the East Norwich development as a whole in the planning obligation statement, and will welcome further discussions regarding this.
119. This development would give rise to a need for improvements to capacity, which, in line with the ICS strategic estates strategy, would primarily come from Improvements/reconfiguration, extension of existing infrastructure or the building of a new facility within the area. It will also give rise to increased investment requirements within our acute, community and mental healthcare settings, where the investment will be required to provide and develop functionally suitable facilities for patients, providing the required floorspace to manage the increased demand.
120. A developer contribution will be required to make this development sustainable and to mitigate the impacts of this proposal. The ICS strategic estates workstream has calculated total capital contributions required, split across all health sectors, in this instance to be £9,861,385.
121. Assuming the above concerns and requests are considered in conjunction with the current application process, the ICS strategic estates workstream would not wish to raise an objection to the proposed development, however without any mitigation the development would not be sustainable.

Norfolk Constabulary

122. This represents a very large-scale development that will significantly increase pressure on police resources. Therefore, to enable Norfolk Constabulary to enhance police infrastructure to support the NPPF aim to create safe communities and that crime and disorder, and the fear of crime, do not undermine the quality of life in the new development, it is considered necessary and justified that a contribution based on a development of up to 1859 dwellings of £168 used (in total £312,312 - index linked) is provided by the developers and should be delivered by s106 agreement.
123. This will ensure that the developer contributes to additional necessary infrastructure required to maintain and deliver a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime) for future residents and to meet planning policy requirements.

Norfolk Police – Designing out Crime

124. Detailed comments relating to numerous design, layout, public open spaces, parking elements of the residential and commercial parts of the full and outline parts of the submission. Full comments are available to view on the council's website.

Norfolk Fire Service

125. Our minimum requirement will be 1 fire hydrant per 50 single dwelling houses (or part thereof to provide adequate firefighting water supply, dependent on site layout) on a minimum 90mm potable water main and hydrant(s) shall conform to BS750. However, the final number of hydrants required will need to be assessed when the mix and type of housing proposed for the development area and layout is made clear.

126. Any buildings on the development, that do not comprise single dwelling houses, will be required to have fire appliance access and fire hydrant provision in accordance with Building Regulations

Norfolk Historic Environment Service (Norfolk County Council)

127. The proposed development site has a high potential to contain heritage assets with archaeological interest (buried archaeological remains) of at least of local and regional significance. These include (though not exclusively) Carrow Abbey, including below-ground remains of the Priory church and any associated burials, the possible gatehouse and hospital associated with Carrow Abbey. In addition upstanding and below-ground archaeological remains associated with Carrow Priory, both inside and outside the area protected as a Scheduled Monument, the geoarchaeological deposit model included in the archaeological desk-based assessment has identified deposits of high potential for archaeological remains of Palaeolithic and Mesolithic date and peat deposits with high paleoenvironmental potential.

128. If planning permission is granted, we ask that this be subject to a programme of archaeological mitigatory work.

Minerals and Waste (Norfolk County Council)

129. The Mineral Planning Authority (MPA) objects unless:

- the applicant carries out investigations/assessment regarding the noise impacts of the railhead operations if this has not been specifically investigated, and
- the noise assessment and the Environmental Statement (ES) are amended to consider the Trowse railhead operations; including the fact that the railhead operations are not subject to any restrictions on operational hours or noise limits and therefore could be operation overnight, and
- further mitigation is proposed in the ES for the residential amenity of the proposed development, if the noise assessment finds that impacts from the railhead operation could result in complaints from the future residents, that would prejudice the railhead's continued operation.

130. The Mineral Planning Authority is pleased to note in the illustrative masterplan intervening non-residential uses being proposed, along the eastern boundary, that will provide an acoustic barrier between the rail uses and the sensitive residential uses.
131. The current application has not appropriately considered the potential for noise from the existing Trowse mineral railhead to impact on the amenity of residents of the proposed development. Excessive noise impacts could result in complaints that prejudice the continued operation of the safeguarded rail head.

Planning Obligations (Norfolk County Council)

132. **Education** – Mitigation will be required for: 15 early education places, 254 primary school places, 14 sixth form places and a pro rata SEND contribution. The application does not currently provide this required mitigation in a location agreed with the County Council, therefore Children’s Services object to this application.
133. Taking into account other large scale permitted developments (Anglia Square and Deal Ground extant outline) would generate a total additional demand for spaces for 101 Early Education age children, 354 primary age, 183 high school age and 19 sixth form age.
134. There is currently spare capacity within the Early Education, Primary and Secondary education sectors but no capacity within the Sixth Form sector. When considering other permitted developments and the number of children generated from these developments there will be insufficient capacity in the Early Years Sector (a deficit of 15 places), Primary Sector (a deficit of 567 places) and Sixth Form Sector (a deficit of 186 places).
135. Norfolk County Council’s Children’s Services object to this planning application due to the planning application not supporting the requirement for a new primary school, which is justified due to the numbers of children generated from this development.
136. In addition, if the remaining site allocations within East Norwich (the May Gurney Site and Utilities Site) were to also come forward during the plan period this puts further pressure on all education sectors and the need for the 2FE Primary School site on the Carrow Works site. The Greater Norwich Local Plan policy 7.1 states that ‘a new primary school should need to be established’.
137. Based on the number of children generated from this development, 254 primary aged pupils, it creates the requirement for the minimum of a 420 place 2FE primary school. Therefore, a site in a location agreed by the County Council, is required on the Carrow Works site. The transfer of this site will need to be secured through a S106 agreement.
138. **Library:** A development of 1,859 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of the library.

Norfolk Wildlife Trust

139. No objection in principle. However, add comment that it would appear from the Preliminary Ecological Appraisal (PEA) and biodiversity chapter of the

Environmental Statement (ES) that there are outstanding recommended protected species surveys. It will be necessary for the applicant to demonstrate, for those elements of the wider hybrid application which are the equivalent of a full application, that all survey work and assessment has been completed in advance of any planning decision, in order to ensure that all impacts and potential mitigation are considered fully.

140. There is a clear requirement in the near adopted GNLP for 10% BNG, and so we strongly recommend that further evidence on the delivery of at least 10% BNG is provided with the application.

Norwich Airport

141. No aerodrome safeguarding objections to the application, provided it is in accordance with the plans attached to the application. Subject to an informative note about tall equipment/crane usage.

Norwich Cycling Campaign

142. An east-west route through the site is an opportunity to re-route the Red Pedalway away from its current dangerous and unpleasant route along King Street and Bracondale and instead provide a safe, direct and attractive route.

143. Norfolk County Council's Local Cycling and Walking Infrastructure Plan (LCWIP) identifies the re-routing of the Red Pedalway as a key objective. Re-routing the Red Pedalway will also re-route Sustrans National Cycle Route 1 (NCN1), providing a more welcoming entrance to the city for cycle tourists travelling from the south.

144. Our concerns can be summarised as follows:

- The east-west cycle route is not direct. What is being proposed takes a contorted route around three side of a rectangle. There may be some merit in providing a route along the riverside but an alternative direct route along the road (the desire line) should be provided as well.
- Cycle infrastructure should be built to comply with the current government design standards (LTN 1/20) which emphasise the need for cycle infrastructure to be accessible to everyone from 8 to 80, to be designed for significant numbers of cyclists (and for nonstandard cycles), that it must join together to make a connected network and that it must feel logical and direct.
- The bridge across the River Wensum which will allow for a safe, direct cycle route to the city centre should be included in the planning application.
- The improvements to the underpass to allow for a walking and cycling route under the railway should be included in the planning application.

Norwich Society

145. Objection.

- The application fails to include some features that are essential for the successful development of this new quarter and fails to offer the assurance that other essential requirements will be actually realised.
- The overall scale of the development proposed would have a seriously adverse impact on the Wensum River corridor at this point.
- The proposals would cause substantially harm to numerous outstanding heritage assets within the site.

146. It is very disappointing to see that the developer proposes to make no provision for a new two form entry primary school on this site. The Education Impact Assessment which has been submitted pays no heed to the particular circumstances of this site, nor to the wider ambitions for an educational centre here which could be part of a viable community hub for this new residential quarter. As it stands, the developer is restricting his ambitions to the standard payment of an infrastructure levy and is expecting primary-aged children in this new residential quarter to be walked off-site for up to two miles along heavily trafficked main roads twice a day. In reality, of course, we can expect a school-less development here to generate a substantial number of school-run vehicle movements on already heavily congested rush hour roads. The Society therefore believes that a school presence on the site is essential for the success of this new quarter and the refusal to provide a site for one would be a justifiable reason for refusal.

147. It is disappointing to see only limited assurance at this stage that the development will enable the active travel regime that is advocated in the master planning to date. At this largely indicative stage, the proposed east - west cycle route is rather more contorted than it needs to be and essential off-site connections (through the railway underpass to the Deal Ground and across the Wensum) are far from assured.

148. The Society is very concerned to see the developer's ambitions for the scale, and especially the maximum height, of all the new riverside buildings at Carrow Works.

149. The developer has been emboldened to go even further than the draft SPD and is proposing to front the river with blocks that are all "8-11 storeys", culminating in one that would be "11-14 storeys" and over 50 metres high. This last one is seen as a "gateway" building and the applicant's design code emphasises the desire to "maximise long views across the river and country park". The Society respectfully suggests that it is the long views of this building, not from it, that ought to be the most relevant design concern.

150. The Norwich Society shares the concern of the Broads Authority and others about the impact that such scale will have on the character of the Wensum valley at this point and is puzzled at the apparent change of stance that has occurred over the last decade. The north side of the river here has seen extensive development over the last decade or more and this has been typically capped at 8 storeys in height. Opinions differ as the architectural merits of these new blocks, but their scale and set back have avoided the levels of harm which might otherwise have arisen from taller buildings.

151. The Norwich Society is in full agreement with the concerns that have been expressed by both Historic England and the Ancient Monuments Society in this

respect. The current proposals would cause a high degree of harm to some of the truly exceptional heritage assets that lie within this site and are unjustified on the evidence before us. One effect of the proposals will be to separate the future of Carrow Abbey from the scheduled monastic priory ruins it sits within, to the detriment of both. The conversion of Carrow Abbey into three residential properties would inevitably come at a cost to some important parts of the surviving internal fabric and plan form of this important listed building, whilst the sub-division of Carrow Abbey's lawn for three private garden spaces will inevitably serve to obscure the public's understanding and appreciation of the former monastic cloisters.

152. The Society also is very concerned about the effects that the proposed development will have on the setting of the historic industrial buildings at Carrow Works, especially Building 7/8/8A. As View 12 of the applicant's visual assessment clearly demonstrates, the new building heights proposed along the entire river frontage will serve to dwarf this imposing structure and diminish its historic and visual significance. The Society is particularly critical of the developer's approach to Building 209 which is immediately adjacent to the listed warehouse. It is proposed for 'retention', but only in a grotesquely enlarged form where it now rises to 10 storeys and glowers over its listed neighbour.

153. It is far from clear how one can possibly grant detailed planning permission for the first phase of this project without any listed building application which fully specifies the listed building alterations involved in that phase. By the same token, the merely indicative plans in the outline element of this hybrid application leave one guessing at the eventual effect that such tall structures will have on the setting of the Abbey and the scheduled monument ruins.

Tree Protection Officer (Norwich City Council)

154. G61/G63 (G8 – TPO542) is a visually significant group of trees providing a valuable woodland habitat on site and I would be opposed to its removal. I would also suggest that T60 – misidentified as a beech in the Greengage survey (Red oak, T8 – TPO542) is also worthy of retention, and rather than categorising it as a 'C', a more appropriate 'B' category is applicable. Again, I would be opposed to its removal. Therefore, I would not be able to support this application in its current form.

Trowse Parish Council (TPC)

155. The conversion of Carrow Abbey and its associated outbuildings is a sympathetic one, however, there is feeling that this is possibly over development of the main house and the proposed size of the dwellings within it. It is also thought that only one car parking space for each dwelling is not sufficient.

156. The demolition of the dining area that abuts the Abbey is thought to be a good idea but there is concern that the area could become industrial/commercial buildings.

157. One of the main objections TPC has about this proposed development is the access and movement of traffic from the site. We already see significant amounts of traffic trying to access the Martineau Lane roundabout at peak times and adding more houses to this area will only increase this. There is the

added concern of when the Deal Ground development takes place that this will impact even more on a very busy area. TPC thinks the access and egress of this site (along with that of the Deal Ground) needs to be investigated further to seek an alternative/additional point of access.

158. Overall, the plans for this development are considered to be generally sympathetic with the industrial heritage of this area of Norwich and TPC are pleased to see the retention and enhancement of historic areas that are of importance to the City and Trowse's industrial links.

UK Power Networks

159. Advice and guidance provided in relation to development in close proximity to their substations.

Water Management Alliance

160. The site is outside the Board's IDD, and given that the discharge is proposed to the main river I can confirm that the Board has no comments.

Whitlingham Charitable Trust

161. In summary, the concerns of the WCT are:

- Whitlingham Country Park is a resource which operates at or close to capacity with regards its current Management Plan and budget; and
- The proposed development would substantially increase visitor numbers without increasing revenue into the park; and
- The adverse physical and financial impact of an increase in visitor numbers without a matching increase in funding to mitigate harm has been demonstrated with the recent experience of Covid 19

162. Without adequate mitigation the development will adversely impact an existing community resource and without appropriate mitigation will have an adverse impact on biodiversity within the Park, the Yare Valley and the wider area.

163. This application – and the wider ENSRA project - presents a substantial challenge to Whitlingham Country Park in that it would introduce a significant new population on the doorstep of the park. The application - and the wider ENSRA project - is explicit in seeking to direct new residents to the Country Park and it is inevitable that the development will result in a significant increase in the number of people visiting the park.

164. In terms of scale, the applicant estimates the population of the proposed development at 4,461 people. In addition, the application appears to be contingent on provision of a new bridge across the Wensum and seeks to link directly into the Deal Ground & May Gurney sites to the immediate East. These new routes would provide significantly improved access into Whitlingham for the existing and proposed residents of the Carrow Quay Development, and residents of the new homes on the Deal Ground & May Gurney sites.

165. The potential impacts arising from this increase in visitor numbers is exacerbated by the fact that the park's principal source of income from visitors is derived from car parking fees. Residents of the proposed development – a 'Low car' scheme situated some 360m from the park at its closest point – are highly unlikely to visit by car and, as such, will not contribute to the upkeep of the park by paying parking fees.

Yare Valley Society

166. The existing cycle routes in the vicinity of the Bracondale/King Street junction are inadequate and a disincentive to potential cyclists. Well thought out changes to the design of the roundabout at the Bracondale/Martineau Lane junction should make it safer for cycling and for walking. The changes should provide a much safer route for the users of a modified Outer Circuit Pedalway and should also better link the pedalway network with the proposed Deal Ground/May Gurney development and with the cycleway along Martineau Lane. (The Martineau Lane cycleway, with a few minor improvements, could provide a safe quicker route from the roundabout to Tuckswood and beyond.)

167. The east-west routes, particularly in the future, are likely to be popular routes for walkers, cyclists, and their families, for travelling to reach Whitlingham Country Park, and in the opposite direction travelling towards the City Centre. They should also provide for a re-routed and improved National Cycle Route 1, and Norwich Red Pedalway. A railway crossing in the form of a subway will need careful consideration if the segregation of walkers and cyclists is to be safeguarded, and the hazards of flooding are to be avoided. Has a bridge been considered?

168. The completion of the Bridge over the Wensum and the Underpass under (or bridge over) the railway should be a condition of approval of this application. Attention will also need to be given as to how the bridge over the Yare, to give access to Whitlingham Park, will be funded, and what arrangements may be needed should the Deal Ground development not proceed within a reasonable time frame.

Assessment of Planning Considerations

Relevant Development Plan Policies

169. Greater Norwich Local Plan (GNLP) March 2024

- GNLP1 The Sustainable Growth Strategy
- GNLP2 Sustainable Communities
- GNLP3 Environmental Protection and Enhancement
- GNLP4 Strategic Infrastructure
- GNLP5 Homes
- GNLP6 The Economy (including retail)
- GNLP7 Strategy for the areas of growth
- GNLP7.1 The Norwich Urban Area including fringe parishes, East Norwich
- GNLPSTR.01 (Formerly GNLP0360/3053/R10) East Norwich Strategic Regeneration Area

170. Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

- DM1 Achieving and delivering sustainable development
- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design
- DM4 Providing for renewable and low carbon energy
- DM5 Planning effectively for flood resilience
- DM6 Protecting and enhancing the natural environment
- DM7 Trees and development
- DM8 Planning effectively for open space and recreation
- DM9 Safeguarding Norwich's heritage
- DM11 Protecting against environmental hazards
- DM12 Ensuring well-planned housing development
- DM13 Communal development and multiple occupation
- DM16 Supporting the needs of business
- DM18 Promoting and supporting centres
- DM19 Encouraging and promoting major office growth
- DM20 Protecting and supporting city centre shopping
- DM21 Protecting and supporting district and local centres
- DM22 Planning for and safeguarding community facilities
- DM28 Encouraging sustainable travel
- DM29 Managing car parking demand in the city centre
- DM30 Access and highway safety
- DM31 Car parking and servicing
- DM32 Encouraging car free and low car housing
- DM33 Planning obligations and development viability

Other material considerations

171. Relevant sections of the National Planning Policy Framework December 2023 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF3 Plan-making
- NPPF4 Decision-making
- NPPF5 Delivering a sufficient supply of homes
- NPPF6 Building a strong, competitive economy
- NPPF7 Ensuring the vitality of town centres
- NPPF8 Promoting healthy and safe communities
- NPPF9 Promoting sustainable transport
- NPPF11 Making effective use of land
- NPPF12 Achieving well-designed and beautiful places

- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF15 Conserving and enhancing the natural environment
- NPPF16 Conserving and enhancing the historic environment
- NPPF17 Facilitating the sustainable use of minerals

172. Supplementary Planning Documents (SPD)

- Affordable housing SPD adopted March 2015
- Main town centre uses and retail frontages SPD adopted Dec 2014
- Open space & play space SPD adopted Oct 2015
- Landscape and trees SPD adopted June 2016
- Heritage interpretation adopted Dec 2015

173. Advice Notes and Guidance

- Health impact advice note [for schemes of 100 dwellings or more] January 2012
- Water efficiency advice note October 2015
- Internal space standards information note March 2015
- Accessible and adaptable dwellings standards October 2015
- Bracondale Conservation Area Appraisal March 2011
- Greater Norwich Local Cycling and Walking Infrastructure Plan (LCWIP) March 2022
- Greater Norwich Infrastructure Plan 2022
- East Norwich Stage 1 Masterplan November 2021

174. Norfolk Mineral and Waste Core Strategy 2011

- Policy CS16 - Safeguarding mineral and waste sites and mineral resources

175. Emerging Policy

- East Norwich Supplementary Planning Document (SPD) – further consultation and adoption proposed later in 2024.

Case Assessment

176. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are

detailed above. Material considerations include policies in the National Planning Policy Framework (NPPF), the council's standing duties, other policy documents and guidance detailed above, and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

177. At pre-application stage the local planning authority screened the project that is the subject of this application as Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) with the potential to cause significant environmental effects and therefore 'EIA Development' under the EIA Regulations. The Council confirmed to the applicants that the proposal would need to be subject to an Environmental Impact Assessment (EIA) and an Environmental Statement (ES) would need to be prepared. The planning application therefore includes an Environmental Statement (ES) which considers the likely significant effects of the development on the environment. The issues included within the ES relate to matters identified by the local planning authority through a scoping exercise and include impacts on: transport and access; air quality; noise and vibration; biodiversity and nature conservation; water quality; hydrology and flood risk; soils, geology, contaminated land; archaeology; heritage townscape and visual impacts, socio-economics and human health and climate change.
178. Schedule 4 of the EIA Regulations set out what should be included in an ES including the scope of the assessment to include the consideration of direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development during the construction and operational stages. The EIA process also requires the consideration of reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The findings set out in the ES are referred to throughout the report where relevant to the issue being assessed.
179. In addition, under Regulation 61 of the Conservation of Habitats and Species Regulations 2017 (often referred to as a "Habitats Regulation Assessment") the local planning authority is further required to carry out a Habitats Regulation Assessment. This is addressed in main issue 4 of the report with the council's assessment contained in Appendix 2.

Main Issue 1. Principle of development

180. Key policies and NPPF sections – GNLP2, GNLP5, GNLP7.1, GNLPSTR.01, DM1, DM12, DM13, DM16, DM33, NPPF sections 5 and 11.
181. Currently the Carrow Works site is a designated employment area and prioritised for employment and business development as set out in policy DM16 of the Development Management Policies Local Plan 2014.
182. Over recent years the manufacturing operations that once took place at the site have been scaled back and then relocated out of the area. Large parts of the site are now unoccupied, with the exception of a small number of

manufacturing, storage and distribution type uses located within some of the more modern warehouses on the site.

183. The release of the site for redevelopment can be considered at a strategic level to contribute to regeneration opportunities between the city centre and the Broads, alongside the Deal Ground and Utilities site allocations which form part of the former Local Plan Site Allocations policies (R9 and R10) and which have been carried forward into the new Greater Norwich Local Plan (GNLP) site allocation policy GNLPSTR.01.
184. The site represents previously developed 'brownfield' land. Government emphasis on prioritising development of brownfield sites is evident in the National Planning Policy Framework (NPPF) paragraph 123 which states that 'as much use as possible should be made of previously developed or 'brownfield' land'. Paragraph 124(c) suggests that 'substantial' weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs, and supports appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
185. To this end, this previously developed 'brownfield' site is now available for redevelopment and is located in a potentially sustainable location on the edge of the city. Applications for development on this site should be considered in this context and on their individual merits to determine whether they represent 'appropriate opportunities' to which the NPPF refers.
186. GNLP strategic policy GNLP7.1 now provides the high-level strategy for the Norwich urban area and its fringes, including East Norwich. It identifies East Norwich as a Strategic Regeneration Area (ENSRA), that will create a highly sustainable mixed-use quarter, provides the level of housing and employment growth to be achieved, and states that development must meet the requirements of the site allocations policy in accordance with guidance in a Supplementary Planning Document (SPD) (see Appendix 3 for GNLP policy 7.1 in full).
187. The proposed development represents a high density, residential-led mixed use urban regeneration scheme, which policy GNLP7.1 requires. Policy GNLP2 also requires development to make efficient use of land with development densities taking account of accessibility and local character, with an expected minimum net density of 40 dwellings per hectare in Norwich. The proposals represent 109 dwelling per hectare (total site area) and would clearly contribute in a significant way towards the Government's objective as set out in paragraph 60 of the NPPF of significantly boosting the supply of homes.
188. Officers consider that the extent to which the proposed scheme will contribute to boosting housing supply and meeting Norwich's housing needs is a material consideration of potentially significant weight. The context locally is that upon the adoption of the GNLP the council is able to demonstrate a 5.39 year supply of land for housing, which due to recent changes to the NPPF will be fixed for five years from the adoption of the plan. In any event the Carrow Works development was not anticipated to contribute to the housing land supply until further into the housing trajectory and therefore the determination of this planning application at this time does not have an immediate or direct impact upon the council's current 5 year housing land supply position.

189. Carrow Works along with the Deal Ground/May Gurney and Utilities Site form part of the East Norwich Strategic Regeneration Area (ENSRA). The ENSRA will create a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits. The principle of the redevelopment of this employment site is considered acceptable in the new GNLP which aligns with the council's ambitions for a transformative regeneration of this area as already expressed in an approved masterplan for the East Norwich area. Policy GNLP7.1 acknowledges that the sites may come forward on different timescales and therefore highlights the importance of development being guided by an area wide Supplementary Planning Document (SPD) and should meet the site wide and site-specific requirements set out in the site allocations policy GNLPSTR.01.
190. Carrow Works forms a significant part of the ENSRA. One of the main modifications to the GNLP saw a reduction in capacity of the overall housing number for East Norwich, reducing to 3,362 along with 4,100 jobs. It is anticipated that 3,000 of the homes will be delivered by the end of the plan period in 2038.
191. In advance of and intended to inform the GNLP, the East Norwich Partnership led by Norwich City Council was set up several years ago to bring forward comprehensive and coordinated regeneration of the East Norwich area. The applicant and site owners for the Carrow Works site were part of the partnership and were involved in the production of a Stage 1 Masterplan for East Norwich which was produced after a process of landowner, stakeholder and community engagement and was approved by Norwich City Council Cabinet on 17 November 2021.
192. The masterplan is currently going through a second stage where it has been refined, tested, updated and will be consulted upon to form an SPD to which policy GNLP7.1 refers. The current timeframe for final consultation and adoption of the SPD was subject to the adoption of the GNLP. However, it is currently anticipated that consultation on the SPD will take place in summer 2024, with adoption targeted for the end of 2024. While the SPD is still undergoing review and consultation, limited specific reference will be made to that document throughout this report, as at this stage of its production it would carry limited weight in the decision.
193. Strategic Allocation policy GNLPSTR.01 details the sites which form part of the ENSRA and sets out a number of site wide needs, followed by site-specific requirements relevant to each site, including Carrow Works. The sections of the policy relevant to Carrow Works are set out in full in Appendix 4.
194. Policy GNLPSTR.01 makes it clear from the start that 'development should be undertaken comprehensively and be guided and informed by the SPD for the ENSRA'. Any of the 'proposals should not prejudice future development of or restrict options for other sites in the ENSRA'.
195. In summary, site wide the East Norwich developments are also expected to;
- Be informed by the SPDs movement and connectivity framework, enabling connectivity and permeability within and between sites. Proposals should be designed for ease of access by public transport, with appropriate bridge provision to ensure full permeability by sustainable transport. Applications

should be supported by a comprehensive Transport Assessment which considers the whole of the strategic allocation.

- Create inclusive, resilient and safe communities, with good access to high quality homes that meet housing need and access to high quality jobs and services.
- Co-ordinate delivery of new social infrastructure (e.g new primary school, neighbourhood shopping centre, health facilities and recreational spaces, including public open spaces and child play spaces).
- Make the most of its riverside location. Provide a riverside walk along north and south banks of River Wensum and establish a recreational route to Whitlingham Country Park suitable for accommodating national Cycle Route 1.
- Achieve an exemplar high quality, high density of locally distinctive design, scale and form which respects its context and setting. Establish strong built frontages along the River Wensum and take account of significance of heritage assets and protected trees.
- Repair and re-use heritage assets with great weight given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designed heritage assets.
- Maintain the open character of the Yare Valley and preserve long views towards the Broads and open countryside.
- Protect and enhance existing biodiversity of the site including green infrastructure assets, corridors, trees and open spaces. Enhance linkages from the city centre to the Broads, Carrow Abbey Country Wildlife Site, the woodlands, the wider rural area and elsewhere in Norwich. Achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and River Yare and to the locally registered historic park and garden, along with appropriate improved public access.
- Be designed to mitigate the impact of vibration, noise generation, light and air pollution from adjacent industrial operations, roads and railways in order to protect the amenity of users and occupiers of the sites.
- Not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility.
- Address and remediate site contamination.
- Require an archaeological assessment prior to development.
- Undertake a site specific flood risk assessment prior to development and provide flood resilient design and incorporate appropriate mitigation measures in order to address flood risk from both river and surface water flooding.
- Allow scope for greater use of the Rivers Wensum and Yare for water based recreation, leisure and tourism.

196. Specifically Carrow Works is required to;

- Include conservation and long term management of the scheduled monument and listed buildings on the site and provide a suitable setting for designated heritage assets.
- Adopt and implement a strategy of heritage interpretation.
- Deliver the following key infrastructure, having regard to phasing and triggers set out in the SPD and subject to viability testing through individual planning applications.
 - a) High quality east-west pedestrian cycle route connecting King Street to the railway underpass and facilitate enhancement works to the underpass.
 - b) A pedestrian/cycle bridge over the River Wensum (linking to Carrow Road).
 - c) Key road infrastructure across the site (built to adoptable standards and able to accommodate public transport).
 - d) A second point of access to King Street.
 - e) High quality pedestrian/cycle routes to the city centre and Bracondale.
 - f) Off-site highway improvements, including junction enhancements and improved crossing facilities.
 - g) Safe and convenient cycle route through the site connecting the Martineau Lane roundabout to King Street.
 - h) Serviced site for a two form entry primary school.
 - i) Land for a health facility to serve the whole of the East Norwich development.
 - j) Neighbourhood shopping centre to meet day to day needs of residents in a location which is accessible to all future ENSRA residents by sustainable transport means.

197. The site-specific policy is reliant on a number of key pieces of infrastructure being in place in order to successfully deliver the highly sustainable mixed-use quarter that the policy promotes. The planning application that has been made and is under consideration here however fails to provide certainty as to the delivery of many of these key policy requirements. Many of these points will be assessed in more detail within the relevant topic sections that form the remainder of this report, however a summary overview of the proposals against the site-specific policy is found below.

198. Breaking the site-specific requirements of policy GNLPSTR.01 down into key topic areas, consideration will first be given to movement and connectivity, as without this and given the historic isolation of the site due to its past use, the development will remain in isolation and fail to achieve the highly sustainable

attributes required by the policy. This is discussed in more detail in main issue 7.

199. The application however only secures access and connections to the wider area by utilising existing or new access arrangements which remain entirely within the applicant's control. There remains insufficient detail with regards many of the site-specific policy requirements and as a result;

- a) there is no guaranteed provision of bridges or underpass enhancements to connect the site to surrounding land/developments or other parts of the ENSRA.
- b) The proposed second point of access to the site for vehicles is not considered by the highway authority to be in an acceptable location or of acceptable design.
- c) There is no firm commitment to deliver a package of off-site highway works to provide the necessary improvements to accessibility for pedestrians and cyclists and deliver the active travel measures required to deliver a truly sustainable development.
- d) There remain questions as to the suitability of some of the access arrangements internal to the site and whether they deliver the high quality east-west pedestrian/cycle route through the site, a riverside walk that is continuous and legible or an arrangement of roads that are suitable to accommodate a public transport route through the site.

200. With regards the sites heritage assets, discussed in more detail in main issue 5. When considered against the requirements of policy GNLPSTR.01, the application fails to;

- a) Conserve the sites designated heritage assets in a way which is not harmful to their significance or setting.
- b) Provide an acceptable strategy of heritage interpretation relating to both the site's use and assets within it.

201. With regards social and economic infrastructure provision. This is discussed in more detail in main issue 8. However, in summary when considered against the requirements of policy GNLPSTR.01 the application fails to deliver;

- a) A serviced site for a two form entry primary school.
- b) Land for a health facility sufficient to serve the whole of the East Norwich development.
- c) A neighbourhood shopping centre to meet day to day needs in a location that is accessible to all by sustainable transport means.

202. Therefore, in summary, through recently adopted strategic policy the principle of a mixed-use redevelopment of this previously developed 'brownfield' site can be considered an appropriate use for the site. However, the application as proposed fails to deliver many of the requirements of the site-specific policy that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. In addition, many of the deficiencies

in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result.

203. The application is therefore overall contrary to policy GNLP7.1 and GNLPSTR.01 of the recently adopted Greater Norwich Local Plan.

Main Issue 2. Housing

204. Key policies and NPPF sections – GNLP5, GNLPSTR.01, DM1, DM12, NPPF section 5 and 11.

205. Policy DM12 in the Development Management Policies Local Plan sets out the principles that apply to all residential developments. DM12 is permissive of residential development subject to a number of exceptions, none of which apply having regard to GNLP policy for this site. Policy DM12 includes a number of criteria (a-f) that should be met by new development. Criteria (a) relating to regeneration, (b) relating to impact on environmental and heritage assets and (c) in relation to achieving a diverse mix of uses are addressed in other sections of the report. The following paragraphs therefore focus on DM12 (d) ‘Proposals should provide for a mix of dwellings, in terms of size, type and tenure including (where the size and configuration of the site makes this practicable and feasible) a proportion of family housing and flats to meet the needs of the community. The mix will be based on the findings of the Housing Needs Assessment or subsequent assessments’.

206. The application seeks consent for up to 1,859 dwellings, of which up to 143 are included within the detailed part of the application. The applicants Planning Statement indicates that all dwellings will be designed to meet nationally described space standards for internal space and at least 20% of homes will meet the Building Regulations M4(2) accessible and adaptable dwellings standard in line with policy GNLP5. A summary of proposed dwelling type and size is set out in the table below:

	Apartments – Private sale	Apartments – Build for Rent	Houses	TBC	Total dwellings
1 bedroom	355	217	1		
2 bedroom	540	227	78		
≥3 bedroom			316		
TBC			12	125	
	895	444	395	125	1859

**the submitted viability report suggests the TBC element has been assigned to flats*

207. Of the 1,859 dwelling total, 21% are specified as houses, 79% (1339+125) as 1 or 2 bedroom flats. The 2021 Local Housing Needs Assessment (LHNA) examines property size and tenure issues in Norwich for the period 2018-38. The LHNA indicates that, of the predicted need for market housing arising from the city council area (6,768 dwellings), approximately 25% (1,689 dwellings) is predicted to be for 1 and 2+ bedroom flats and 75% (5079) for 1-5+ bedroom houses. In relation to the need for houses, most need is for 3 bedroom properties (3,513). Therefore, over the plan period the proposed number of market flats within the Carrow Works development (1,464) has the scope to meet approximately 87% of the need for 1- and 2-bedroom flats and 8% of the need for family housing.

208. Policy DM1 states that development should help promote diverse, inclusive and equitable communities. In terms of the proposed dwelling types for the Carrow Works development, the proposed range is likely to limit to some degree the number and size of families who could be satisfactorily accommodated on the site. Policy DM12 acknowledges that the size and configuration of certain sites can influence the practicality and feasibility of including family houses. In addition on brownfield sites, where there is the objective to make effective use of land and convert existing buildings, flats provide greater flexibility and are important in generating development value to underpin viability. Furthermore, the East Norwich Stage 1 Masterplan anticipates substantial housing growth, high densities and a high proportion of flats, indicating for the ENSRA a development wide schedule of accommodation of 61% flats and 39% houses. However, the proportion of flats proposed as part of this application exceeds the Masterplan percentage by some degree and officers are mindful of the number of flats that have been built in the city in recent years and of other city centre sites which, over the plan period are expected to come forward, very likely with predominantly flatted schemes. On the basis of the LHNA, and without any other contrary market information, this may result in an oversupply of flats, suppressed market interest/values of these properties and in broader housing need for the city not being met.

209. In terms of tenure, the proposal makes no provision for affordable housing. For Norwich, the LHNA indicates over the period of 2018-38 a need for 5,086 dwellings to meet the needs of those who cannot afford market rents or are aspiring to home ownership. The proposal makes no contribution to meeting this identified need for affordable housing. Policy GNLP5 sets out a requirement for 33% of new housing to be affordable. A vacant building credit is likely to be applicable to development of this site, but there is insufficient information to establish the degree to which this would reduce the 613 affordable unit requirement (based on a total of up to 1,859 dwellings across the whole site). The 33% GNLP5 requirement applies unless the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage. The issue of viability and the impact this has on the viability of affordable housing provision is addressed in main issue 14 towards the end of this report.

210. Paragraph 66 of the NPPF requires that where major development involving the provision of housing is proposed, decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The NPPF sets out exceptions to this requirement, none of which apply to this application.

211. Carrow Works and the wider ENSRA represents one of the city's most significant regeneration areas. Strategic in scale it is envisaged as a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits. Policy GNLPSTR.01 states that development must create an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing need along with opportunities to access high quality jobs and services. A housing mix which fails to meet housing need, in particular for those in affordable housing need, is unsustainable and wholly unacceptable in terms of achieving regeneration benefits and planning for diverse, inclusive and equitable communities.

212. The Development strategy officer has stated that ‘it is very disappointing to see that the applicant is not proposing to deliver any AH (*affordable housing*) on the grounds of viability, and we would therefore object to the application on this ground.’ Having regard to the LHNA and the 3,323 dwellings needed between 2018-38 to meet the need for social and affordable rent, if meaningful levels of affordable housing are not delivered on large scale strategic sites there is significant risk that this need will not be met.
213. The application proposes a quantum of new homes, which positively supports the delivery of significant housing growth in this location. Housing delivery of this scale is capable of being afforded substantial weight in the planning balance. However, in the absence of any contrary evidence, the housing types proposed and particularly the predominance of flats is not consistent with the Greater Norwich Local Housing Needs Assessment. This along with the total lack of affordable housing results in an unsustainable housing development proposal, whereby the mix of dwellings by type and tenure fail to promote the creation of a mixed, diverse, inclusive and equitable community, contrary to policy DM1 and DM12 of the Development Management Policies Local Plan 2014, policy GNLP5 and GNLPSTR.01 of the Greater Norwich Local Plan 2023 and the NPPF.

Main Issue 3. Employment, retail and other town centre uses

214. Key policies and NPPF sections – GNLP2, GNLP4, GNLP6, DM18, DM19, DM20, DM21 and NPPF section 7 and 9.
215. As a mixed-use development, the hybrid planning application proposes up to 26,630sqm of flexible mix of business and commercial (including retail uses), hotel, residential institution, learning and non-residential institutions, local community uses, general industrial, storage and distribution uses within new and converted existing buildings. A significant proportion of this floorspace (66% or 17,625sqm) is included within the full submission.
216. Offices, light and general industrial, research, storage and distribution are defined in Policy DM16 as employment development. Such uses are promoted on sites designated as employment areas where this would not conflict with other policies in the plan in relation to town centres and office development. The site is currently designated as an employment area and in the past the site has played an important role in providing significant number of jobs within the city.
217. Retail, leisure and office uses are defined by the NPPF as main town centre uses. Developments involving these uses (with the exception of offices) are subject to existing Local Plan policy DM18 and policy DM20. Policy DM18 is supportive of main town centre uses within the city centre primary and secondary retail areas, large district centres and existing and proposed district and local centres where their scale is appropriate to the centre’s position in the hierarchy set out in policy JCS19 and does not exceed the indicative floor spaces set out in appendix 4 of the Local Plan. Although the JCS has been superseded by the GNLP, policy GNLP6 sets out a similar hierarchy.
218. Policy DM19 allows new office accommodation within identified priority areas (this is not a priority area) or where the proposals would not conflict with sustainable development criteria, is appropriate to the character and function of the area and where justified by a sequential site and impact assessment.

219. The site is not currently or proposed to be specifically designated as a district or local centre suitable for main town centre uses. However, it is recognised in policy that the sites forming part of the ENSRA will create a highly sustainable mixed-use quarter accommodating substantial housing growth and significant new employment opportunities. To this end policy GNLP7.1 highlights provision of 3,362 homes and 4,100 jobs across the whole of East Norwich.
220. Works that have taken place to support the site specific policy and the formation of the SPD have sought to include non-residential uses to complement the existing offer in Norwich, but also create new opportunities to meet the needs of residents and businesses. It is envisaged that appropriate levels of retail could be included as part of the range of commercial uses (including business, leisure and community uses) in the main street area of the site. Some limited neighbourhood scale convenience retail could be acceptable as part of a mix of uses, however the format would be expected to be for a local 'walk-to' facility rather than a larger out of centre retail format with generous parking aimed at drive by trips, which would not be acceptable in this location.
221. The stage 1 Masterplan which informed the GNLP policy worked up a vision for the Carrow Works site as providing an opportunity for a dynamic mix of non-residential uses. It suggests a mix of office, co-working, small and medium enterprises, food hall and ancillary retail space along the riverside area and in the northwest of the site. Along the main east-west street a new high street of uses to support residential and workspaces would be created with small format food retail and hospitality, professional services and leisure, health and fitness uses. In areas adjacent to the railway line and to the northeast, light industrial and workspace uses will provide a buffer between the railway line and the new high street and residential uses. Finally, alongside the main entrance to the site from the Martineau Lane/Bracondale roundabout a community cluster of social facilities including a primary school and health facilities is envisaged.
222. Care should be exercised however as an existing large district centre at Riverside Retail Park is located approximately 850 metres from the existing site access (or just 300 metres from the site via a new bridge when provided over the River Wensum). Also the edge of the city centre primary retail area at Ber Street is located just 1.4 km to the north west. Therefore, it should be ensured that the amount and mix of employment uses proposed at the site would not compete with this existing large district centre or city centre retail and service offering such that it impacts on the vitality and viability of these centres.
223. Policy GNLPSTR.01 states that Carrow Works will provide 'a neighbourhood shopping centre to meet the day to day needs of future residents ... in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means'.
224. The applicant's outline parameter plans include a land use plan which shows a small amount of Class B (employment) provision alongside the railway. It also shows Class E (commercial, business and service) uses within existing buildings to the northwest of the site and as part of a flexible provision alongside residential uses at ground floor level along the east west route and the riverside and also in a location to the east of the site entrance from the Martineau Lane/Bracondale roundabout. In addition, supporting documents,

including the Design Code, make it quite clear that 'local retail, including a large food store at the main entrance' forms part of the mixed-use land use proposals which form part of the outline part of the application.

225. A Retail Statement has been submitted with the planning application which includes both a Main Town Centres Use Retail Sequential Test Assessment and a Retail and Leisure Impact Assessment. Non-residential uses are set out within the report as follows;

Total non-residential uses	26,630 sqm
Comparison and convenience retail and leisure uses	12,356 sqm
Office floor space	11,271 sqm
Industrial Floor Space (Class B)	3,003 sqm

226. The report suggests that of the 23,627 sqm of commercial floor space 12,356sqm of comparison and convenience retail and leisure floor space will be mainly located at ground floor level within existing and proposed buildings along the main street and riverside areas of the site. However, 2,203 sqm of convenience/food retail is suggested in the area alongside the main entrance to the site from the Martineau Lane/Bracondale roundabout. This represents a significant amount of total retail and leisure floor space, similar in scale to existing large district centre provision at Riverside and Anglia Square. Careful consideration will be required to ensure that the amount of floor space and type of provision proposed does not give rise to significant detrimental impacts on existing provision within designated centres.

227. The report provides an assessment of potential sequentially preferable sites and an analysis of the proposal's retail impact on the relevant defined centres within the 'assessment area'. While citing case law relating to disaggregation (the breaking down of the development into smaller parts to accommodate it across more than one site) the report considers it appropriate to only consider sites of between 13.51 hectares and 20.29 hectares (total area of the whole mixed use development site including a 20% allowance either way) as part of the sequential test. They consider this appropriate due to the non-residential uses on this mixed-use development site being inter-dependent on the other elements of the proposals (i.e. the residential uses). However, the development proposed forms a substantial part of a wider residential-led-mixed use community. Residential is the primary element of the allocation and therefore it does not seem appropriate to consider that such a large site area should form part of the requirement of the sequential test without being broken down into its constituent land use parts or even broken down further into the two separate areas for potential non-residential focus on the site of the riverside/main street area and the area adjacent to the existing site access to the Martineau Lane/Bracondale roundabout. Given that the application site forms a large part of one of the city's two strategic regeneration areas (Anglia Square being the other) it comes as no surprise that a sequentially preferable site of a size that can accommodate the whole mixed-use development cannot be found.

228. The applicants impact assessment maintains that the retail and leisure elements of the proposed development would mainly cater for the day-to-day needs of the future residents of the proposed development and the wider East Norwich allocation. They suggest that only a small amount of trade diversion from existing centres at Riverside and the city centre is likely to occur due to the relative scale of the retail provision on offer at existing centres and the different type of offering proposed at the site. They actually suggest that the proposals would contribute overall to the vitality and viability of these centres due to the additional footfall and turnover that will be available within the catchment area of these locations.
229. The impact assessment concludes that there will be up to modest diversion from surrounding retail and leisure units within the proposal's catchment area. It goes on to suggest trade diversion through direct competition with Aldi at Hall Road Retail Park/Sandy Lane (a district centre) is possible and minimal diversion from Morrisons superstore at Riverside Retail Park (a large district centre), including likely draw of customers from the immediate rural areas outside Norwich using the A146. This demonstrates a clear intention of the Class E convenience retail use to take advantage of its location at the entrance to the development and close to the existing road network, and the inner and outer ring road, as an opportunity to benefit from linked trips, diverting car based trips into the site.
230. The suggested food store use in a location alongside the main site entrance is some distance from parts of the Deal Ground and Utilities sites and therefore would not be a location which is particularly accessible to meet the day to day needs of all future residents of the ENSRA as required by policy GNLPSTR.01. It would appear to be more the case that the scale, proximity and visibility of the food store site from the main site access would attract visits from car based users of the adjacent inner and outer ring road which forms an important part of the city's highway network. The existing physical road infrastructure and layout presents a busy and unattractive walking and cycling environment and therefore acts as a barrier to accessing the site by means other than the private car. In addition to the lack of clear and committed improvements to infrastructure to improve active travel to the site or between constituent parts of the ENSRA, the introduction of larger format convenience retail in this location will likely encourage use of the private car to access such a use, therefore failing to reduce dependency on the private car or the shift towards non-car modes that policy DM1 or policy GNLP4 requires.
231. The submission also proposes a significant amount of office floor space (11,271sqm). It is well documented that since covid demands for office space have changed with demands for many traditional forms of office accommodation falling within the city. Therefore, although office use is considered to form an acceptable component of the mix of uses that would generate jobs at the site, there is nothing within the submission that suggests the type of office space or the amount of office floor space is appropriate or indeed sustainable in this location and will not impact on existing office accommodation provision in the city.
232. It is recognised that a significant amount of non-residential floor space provision will be required to generate the jobs that this strategic allocation commits to deliver together with meeting the day to day needs of residents and workplaces. However, no detailed economic strategy has been provided by the

applicant which breaks down in more detail the uses proposed and their location and the contributions that this will make to job creation or to demonstrate how the retail and leisure and office uses can be achieved without impacting on existing town centre use provision or office accommodation on sites designated for such uses nearby. A wide range of flexible uses across more than 12,000sqm metres of floor space in particular could have quite significant impacts on Riverside Large District Centre (total units approx. 16,000sqm). If no controls are placed on amounts of floor space for specific parts of this extremely broad planning use class, significant amounts of, or large format retail for example could impact greatly on the viability of existing retail centres in such close proximity. The submission currently does not provide sufficient detailed information to conclude whether the non-residential uses proposed would comply with the detail set out within GNLP policies.

Main Issue 4. Impact of the development on European designated sites of nature conservation interest

233. Key policies and NPPF sections, GNLP1, GNLP2, GNLP3, GNLP7.1, DM1, DM3, DM6, DM8 and NPPF section 15.
234. The proposed scale of residential development at Carrow Works has the potential to impact on European and Ramsar designated sites.
235. Local Authorities, as competent authorities have a legal duty to help protect, conserve and restore European sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)). Protection includes prevention of significant deterioration and significant disturbance.

Nutrient impacts

236. The Dutch Nitrogen Case¹ ('Dutch-N'), heard in the court of Justice of the European Union (CJEU), ruled that where an internationally important site (i.e., Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites) is failing to achieve a favourable condition due to pollution, the potential for a new development to add to the nutrient load is "necessarily limited". The Dutch-N case has informed the way in which regulation 63 of the Habitats Regulation 2017 should apply to pollution related incidents. This has resulted in greater scrutiny of proposed developments that are likely to increase nutrient loads to internationally important sites where a reason for unfavourable condition is an excess of a specific pollutant.
237. Following the Dutch Nitrogen Case, on the 16 March 2022 Natural England issued new guidance to a second tranche of local planning authorities (including Norwich and other Norfolk authorities) concerning nutrient enrichment and the role local authorities must play in preventing further adverse impacts to protected wetland habitats. The importance of achieving nutrient neutrality stems from evidence that large quantities of nitrogen and phosphate nutrients entering water systems cause excessive growth of algae, a process called 'eutrophication.' This reduces the oxygen content of water which increases the difficulty of survival for aquatic species; subsequently removing a food source for protected species. Local Planning Authorities are now required to consider the impact of nutrient enrichment before planning permission can be granted and therefore all planning applications for certain types of developments in the affected catchments have been put on hold until it

can be demonstrated how they will mitigate any additional nutrients arising from them.

238. Policy GNL3 states that all residential development that results in an increase in the level of overnight stays and non-residential development that by virtue of its scale and type may draw people from outside of the catchment of the River Wensum and Broads SAC must provide evidence to enable the local planning authority to conclude that the proposal will not adversely affect the integrity of sites in an unfavourable condition. This part of the policy reflects the current advice provided by Natural England in relation to development proposals that have the potential to affect water quality due to adverse nutrient impacts on designated habitats sites and Habitat Regulations requirements.

Recreational disturbance impacts

239. The potential for recreational activities to disrupt the protection objectives of habitats sites in and around Norfolk is related to the level of growth in each Local Plan 'in combination'; specifically, an increase in population resulting from identified new housing requirements across the County that will in turn ensure more people visit habitats sites for recreation. This residential growth, combined with an increase in tourism accommodation, will result in more people visiting and possibly harming habitats sites as a result of residents visiting sensitive protected sites for recreational purposes.

240. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS) has been produced to support Local Planning Authorities (LPAs) in Norfolk in their statutory requirement to produce 'sound' i.e., legally compliant Local Plans for their administrative or Plan making areas. Norfolk authorities adopted GIRAMS in March 2022. The strategy addresses individual, and the in-combination impacts of recreational impacts at habitats sites from residential development predicted across Norfolk. On 9th March 2022 the Council adopted the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) to deal with the issue of visitor impacts of new development.

241. In relation to the in-combination impacts, since 31 March 2022 all local authorities in Norfolk have applied, to relevant permissions, a RAMS tariff of £210.84 (RPI indexed link) per property. These pooled RAMS payments will fund a package of measures to manage and reduce the impact of people making extra visits to Special Areas of Conservations (SACs) in the county, including the Broads and the Norfolk Coast. The second element of the strategy relates to 'GI' and securing the provision on/near development sites Green Infrastructure provision, for the purposes of avoidance in the first instance and to mitigate the impacts of the individual development itself. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation rather than visiting habitats sites.

242. Policies DM3 and DM8 relate to green infrastructure and open space requirements. DM3 requires all new development to make appropriate provision for both the protection of existing and the provision of new green infrastructure as an integral part of the overall design which complements and enhances a development. DM8 relates to open space and recreation and requires all new development to contribute to the provision, enhancement and maintenance of local open space either by means of on-site provision or direct

contribution through the community infrastructure levy. Neither of these policies, or accompanying SPD, set out detailed/specific requirements for the amount of GI/open space provision.

243. Policy GNLP3 refers explicitly to the issue of visitor pressure and includes a requirement for the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of the residents as an alternative to visiting the protected sites. The policy reflects the findings of the Norfolk GIRAMS strategy and states that all residential development will address the potential visitor pressure, caused by residents of the development, that would detrimentally impact on sites protected under the Habitat Regulations Directive through;

- Payment of a contribution towards the cost of mitigation measures at the protected sites (as determined under the GIRAMS plus an allowance for inflation), and
- The provision or enhancement of adequate green infrastructure, either on the site or nearby to provide for the informal recreational need of the residents as an alternative to visiting the protected sites. Provision should equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace (ANG) Standard.

244. Policy GNLP3 reflects the findings of the Norfolk GIRAMS strategy and Habitat Regulations requirements. Policy GNLP1, GNLP7.1 and GNLPSTR.01 for East Norwich also make reference to development being required to protect and enhance biodiversity and green infrastructure assets, networks, corridors, trees and open spaces, however it is the strategic level policy GNLP3 which applies to development across the whole Plan area which carries most weight for the purposes on this decision.

Mitigation measures

245. Without appropriate mitigation the proposed development would therefore have an adverse effect on the integrity of:

- The Broads Special Area of Conservation (SAC)
- Broadland Special Protection Area (SPA)
- Broadland Ramsar
- Breydon Water SPA
- Winterton-Horsey Dunes SAC
- Great Yarmouth and North Denes SPA
- North Norfolk Coast SAC
- North Norfolk Coast SPA
- North Norfolk Coast Ramsar
- The Wash and North Norfolk Coast SAC

- The Wash SPA
- The Wash Ramsar
- Norfolk Valley Fens SAC

246. In terms of assessing the impact of the proposed development and demonstrating sufficient mitigation is secured to ensure the development will not adversely affect the integrity of the identified European sites, the applicant's should set out how the development will meet the requirements of both GIRAMS and nutrient neutrality.

247. Within chapter 10 of the applicant's Environmental Statement (ES) it is acknowledged that the operational phase of the development, with an increased number of dwellings, will result in potential increased nutrient pressure by additional wastewater and additional recreational impacts, on internationally designated sites. In both cases, it is recognised that in the absence of mitigation this could cause significant, permanent, negative impacts on an international scale.

248. On the matter of increased nutrient impacts the report suggests that there are various options available for nutrient load impacts, but no specific measures have been opted for. It goes on to suggest that the detailed/full part of the application does not include any new buildings and therefore proposes that nutrient neutrality is considered and conditioned at the reserved matters stage. This demonstrates a significant misunderstanding by the applicant of the implications of nutrient neutrality on their development. The detailed/full part of the application includes the creation of new dwellings, some through conversion of existing buildings and some through new build dwellings and therefore the nutrient impacts of the development does need to be considered at this stage and cannot be subject to planning condition.

249. A more realistic summary of the situation with regards nutrient neutrality mitigation solutions as currently observed by officers is that, although progress is being made on identifying mitigation solutions and bringing such solutions forward to the market to allow developers to purchase mitigation credits, there is still work to do. For a development of this scale mitigation requirements will be significant and it does not appear that the applicant has made any attempt to identify and source mitigation measures/credits.

250. No Nutrient Budget Calculator has been completed or provided to calculate the level of nutrients arising from the development to then determine the amount of mitigation required. An allowance is made for nutrient neutrality within the applicant's financial viability report (as an unconfirmed amount for mitigation within developer contingency) and is proposed for inclusion within any legal agreement, but goes on to highlight that further discussion with the local planning authority on this matter will be required. However, no such discussion has taken place.

251. On the matter of recreational disturbance impacts, although the financial viability report does include a payment of the RAMS tariff, no mechanism has been provided through a legal agreement to secure payment of the tariff to mitigate the 'in combination' recreational impacts of the development.

252. No assessment has been provided of the green infrastructure provision which forms part of the application or the green infrastructure requirements of the development to meet the individual recreational requirements of the development in accordance with policy GNLP3. The ES highlights that a total of 4.7 hectares of open space will be provided, broken down into;

- 0.8 hectares of parks and gardens,
- 2.62 hectares of natural and semi-natural green space,
- 0.05 hectares of provision for children and young people,
- 0.13 hectares of green corridor.

It is not clear whether this is the amount of provision that is shown on the high level 'Public Open Space' Parameters plan which forms part of the outline application.

253. Using average household size of 2.4 people this amounts to a resident population of 4,461 (based on 1,859 dwellings). Using Natural England's Accessible Natural Greenspace (ANG) Standard the development would be expected to deliver approximately 9 hectares of green infrastructure just to meet the informal needs of residents from the development. No clear green infrastructure assessment has been provided which sets out in more detail the GI provision on site and its function or assessment of existing accessible off-site green space provision capable of offering recreational opportunities with GI enhancement. It would appear that the development is deficient in the amount of green infrastructure provision on site, its placement and potentially its design and functions being able to meet the recreational needs of the residents (including dog walking). GI enhancement off-site will therefore likely be required. This does not appear to have been recognised within the applicant's submission and this deficiency in GI is something that Natural England have commented upon.

254. Of note is the proximity of the site and the whole of the ENSRA to Whittingham Country Park, a 113 hectare park which incorporates areas of woodland, grazing meadow and water space provided by two broads, which serves as a valued recreation space for residents and visitors to Norwich. Given its proximity to the site (just over a mile by road from the existing site entrance) and subject to securing appropriate active travel improvements between the sites as the policy requires, this could be a logical area of existing green space that new residents could benefit from and enjoy for their recreational needs. However, it would need to be ensured that any necessary enhancement of this existing green infrastructure is secured to satisfactorily accommodate and mitigate the corresponding increase in the number of visitors to the county park without detriment to the park itself. This has been raised as a valid concern on behalf of Whittingham Charitable Trust who manage the country park by lease from the landowner, Crown Point Estate.

255. Therefore, neither a GIRAMs contribution nor mitigation to ensure that the development is nutrient neutral have been provided by the applicant. In addition, it has not been demonstrated that there is adequate green infrastructure provision on site or enhancement of any nearby provision to meet the informal recreational needs of the residents of the proposed development.

256. Under section 63 of the Habitat Regulations the council, as competent authority, before deciding to give consent to a project that is likely to have a significant effect on a European Site must make an appropriate assessment of the implications of the project for that site in view of that site/s conservation objectives. The competent authority may only agree to the project after ascertaining that it will not adversely affect the integrity of the European site.
257. No shadow Habitat Regulations Assessment, Appropriate Assessment or 'such information as the competent authority may reasonably require for the purposes of such an assessment' has been made available to enable the local planning authority to fully assess the impacts of the development and determine no adverse effects on the integrity of protected sites. The information that has been provided can only lead to a precautionary conclusion that the proposed development would give rise to adverse affects on the integrity of habitats sites in an unfavourable condition due to significant deficiencies in mitigation.
258. An Appropriate Assessment concerning both recreational impact and nutrient neutrality has been carried out by officers and can be found in Appendix 2.
259. The Appropriate Assessment concludes that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in nitrate and/or phosphate levels which would further adversely affect the current unfavourable status of the Broads Special Area of Conservation or demonstrate that this proposal would not result in an increase in recreational disturbance due to the impact of additional visits to Special Areas of Conservation (SACs and SPAs) in the Wash, Norfolk Coast and the Broads. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of these habitats sites and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).

Main Issue 5. Heritage

260. Key policies and NPPF sections – GNLP3, GNLP7.1, GNLPSTR.01, DM3, DM9, DM12, NPPF section 12 & 16. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
261. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on the local authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law (specifically *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014]) has held that this means that considerable importance and weight must be given to the desirability of preserving the setting of listed buildings and conservation areas when carrying out the balancing exercise.
262. NPPF paragraph 201 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by

a proposal (including by development affecting the setting of a heritage asset) and take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. "Great weight" should be given to the conservation of heritage assets (NPPF paragraph 205) and the implications of identifying levels of harm in relation to different grades of heritage asset are explained in paragraphs 206-208 of the NPPF. Importantly, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Furthermore, adopted policy DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets.

263. Policy GNLP3 requires development to avoid harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and other relevant policies of the Development Plan. Whereas policy GNLP7.1 looks for conservation and enhancement (where possible) of the significance of heritage assets. The site-specific policy GNLPSTR.01 confirms a general presumption in favour of the repair and re-use of heritage assets on site as part of any redevelopment proposals. It requires great weight to be given to the conservation of all designated heritage assets across the ENSRA and proposals should provide a suitable setting for designated heritage assets affected by the proposal on and off site including key views from and into the site. Development proposals should draw upon local character and distinctiveness and conserve, or where opportunities arise, enhance the character and appearance of the conservation areas affected, the scheduled monument, listed buildings, locally listed buildings and other non-designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting).

264. A large part of the Carrow Works site lies within the Bracondale conservation area and forms a significant part of that conservation area. The scale of the development proposed will undoubtedly have an impact on the conservation area, a significant number of designated and non-designated heritage assets within it and some around it (including Carrow House), and on the wider city/townscape and approach to the countryside on the edge of the city. It will change the setting of those assets and the contribution the setting makes to the appreciation and significance of those assets. A list of heritage assets can be found in paragraph 11 above and will be discussed in more detail as necessary in the remainder of this section.

265. The application has been accompanied by a Heritage and Townscape Visual Impact Assessment (HTVIA) as part of a technical appendix to the Environmental Statement. The HTVIA assesses the significance and contribution of setting to significance of heritage assets and provides an assessment of the likely heritage, townscape and visual effects of the development during construction and operation of the development by carrying out a visual impact assessment. An assessment of significance is provided for each individual heritage asset, together with relative significance of buildings and spaces. There is however no wider assessment of the site as a collection of heritage assets as a whole. Accurate Visual Representations (AVRs) are used to assess effects on setting of heritage assets as part of a viewpoint analysis, using either verified wireline views or verified renders. There are

questions and conversations that remain to be had around some of these representations, especially given the 3D views provided within the applicants Daylight and Sunlight Report for the same development parameters. Again, it has not been possible for these discussions to take place due to the lack of engagement by the applicants.

266. Alongside specialist conservation advice from the council's own conservation and design officer, three organisations with a special remit for and interest in the conservation of the historic environment have commented on the application. They are Historic England, Ancient Monuments Society and the Norwich Society. All conclude that the scheme would harm the historic environment and their positions are summarised within the assessment, broken down across the site and its groups of assets below.

Carrow Abbey and grounds

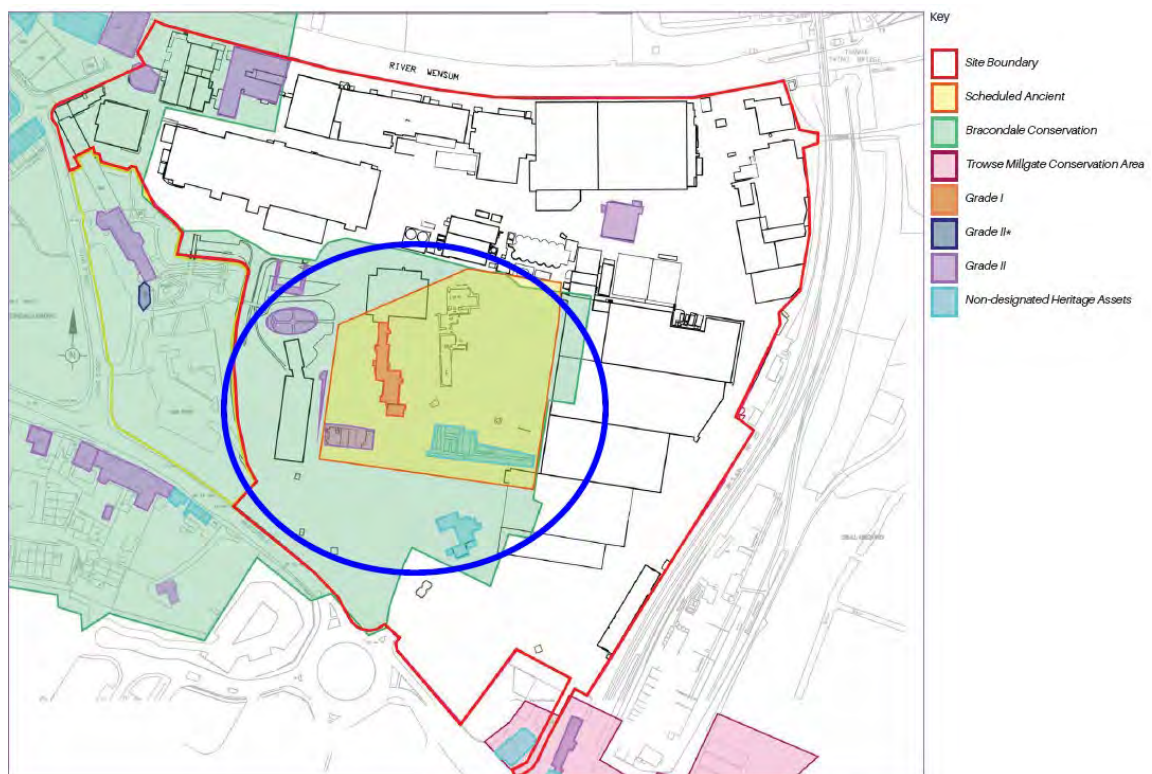
267. This is a very interesting site in heritage terms with the remains of a Benedictine convent, remodelled and expanded in the late Victorian and Edwardian period as a private home for the wealthy Colman family, who simultaneously developed their industrial works adjacent to this along the river. There is a high level of archaeological, architectural and historical significance in these layers as well as communal value.

268. The ruined portions of the Priory (a scheduled monument) are a rare survival of one of a small known number of female religious houses. Founded in 1146 it has exceptional standing, buried and earthwork remains.

269. The remains include the prioress's house built in the 15th century then adapted and expanded to form the Colman's home, referred to as 'Carrow Abbey' which is grade I listed. The craftsmanship and detailing of this late Victorian and Edwardian home are of a very high quality and much survives of the fabric and plan form. It illustrates the work of Edward Boardman, an important architect with strong associations with Norwich.

270. One of the important characteristics of the site is the two distinctive characters of the Abbey site and the industrial works. The dramatic change in gradient between the Abbey that sits on an elevated plateau above the river and the works site located at a lower level along the riverside and railway provided a separation between the factory and domestic parts, which was strengthened by planting.

271. It is the view of Historic England that the historic core of the site around the Abbey (character areas 1, 2, 5 and elements of 4 as identified within the HTVIA) is the most sensitive part of the site. While there is potential for considerable new development across the site as a whole, maintaining and enhancing these historic assets and the open garden setting around them is important.



272. The site plan above highlights in colour the various heritage assets, the conservation area and the extent of the scheduled monument (incorrectly depicted as it should follows lines that include the large square block of the dining hall). Throughout the remainder of this section reference is made to the historic core of the site which is an area roughly encircled on the above plan. Proposals in this area of the Abbey site and its grounds involve the conversion and subdivision of the Abbey into three separate dwellings together with its curtilage land immediately to the east (the site of monastic cloisters) in order to accommodate individual private gardens. Along with internal works to the Abbey, there is proposed demolition of the modern single storey/bungalow addition to the south of the Abbey and the extensive single storey dining hall/canteen attached to the north. These works of demolition of low significance additions, would better reveal the Abbey, physically separating it (through demolition) from more modern additions and improving its setting, which represents a clear conservation benefit and is supported in principle by the conservation consultees.

273. However, in their place is proposed a two storey extension to the north of the Abbey to create additional living space for the northern most dwelling, together with a cluster of nine new build residential dwellings. Both are discussed in more detail later.

274. The subdivision of Carrow Abbey would mean the building could no longer be appreciated as a single property. Much of the Abbey's architectural and historic interest lies in the high survival of late Victorian and Edwardian fabric and the plan form. The division of the house would limit the ability to appreciate its plan form and the quality of the rooms and fabric which collectively illustrate a high-status domestic property of this period.

275. Historic England have observed directly that the insertion of partitions and services to create the separate dwellings would compromise these rooms and the historic fabric. They comment that 'the division between houses 1 and 2

affects the two grandest parts of the house, including rooms with exceptional panelling and other fixtures. The addition of new panelling could compromise the rooms. The insertion of a bathroom on the first floor of house 1 would detract from the space and appreciation of the moulded timber ceiling. The bathroom proposed between the existing staircase and window also looks very tight against the window. The division between houses 2 and 3 would cut across the tiled service corridor on the ground floor and panelled cupboards in the first-floor corridor’.

276. The proposed new extension at the northern end of the Abbey at two storeys is higher than the existing link in this location and would obscure more of the exceptional flint work to the gable elevation and would therefore harm the significance of the building.

277. Historic England raise concerns that the creation of private spaces across the historic core of the site would change the character of the site from a unified landscape. It would harm the significance of the heritage assets which were designed to be appreciated within an open landscape. Externally, the former monastic cloister can currently still be clearly read as such and provides a tangible link between Abbey House and the upstanding priory ruins. Any subdivision of the cloister into private gardens, or separation of it from the priory ruins or house, would substantially compromise the way the monastic complex can be understood and appreciated and would harm the significance of both the scheduled monument and grade I listed house, a view shared by the Norwich Society. Also, the resulting separate ownerships would create challenges for the future management of the monument in a holistic way and could compromise how it is appreciated.

278. The council’s conservation and design officer raises similar concerns regarding the potential level of harm to the significance of the grade I listed Abbey and its association with Carrow Priory (scheduled monument). The Abbey, being a significant element of this historic setting, has a strong connection with the surrounding soft landscape and the scheduled Priory ruins to the east highlighting the remarkable history of the site. The proposed separation and domestication of the grounds, introduction of boundary treatments alongside the new residential units replacing the existing dining hall would have a harmful impact on the special character of the Abbey and Priory ruins, negatively affecting the entire scheduled monument and the way it is perceived and experienced.

279. Of note here is the fact that Historic England have advised that any fencing or other boundary treatments necessary to subdivide the cloister or priory ruins area would require scheduled monument consent. They go on to suggest that they would be unlikely to be able to recommend to the Department for Digital, Culture, Media and Sport (DCMS) that scheduled monument consent (SMC) should be granted for such a proposal as they do not consider that the harm to the significance of the monument that would result would be outweighed by any public benefits.

280. The applicant’s heritage consultant accepts that due to their sensitivity, works to subdivide the Abbey will lead to change within the setting of the Priory and Abbey. They identify the change as having a ‘moderate adverse effect’ with the potential to cause a low level of less than substantial harm. They suggest that the nature of the works to convert the Abbey are such that the

degree of intervention into the fabric is minimal, and the change of use to residential is considered the least harmful option to restore a function to the building and achieve a sustainable and Optimum Viable Use. They also maintain that provision of private garden spaces associated with the Abbey by enclosure with low level hedging, will maintain open views from the publicly accessible gardens while creating privacy for residents, without creating an intrusive sense of sub-division.

281. However, no optimum viable use assessment has been provided to justify the residential use of the Abbey. NPPF paragraph 203 sets out the desirability of finding a viable use consistent with the conservation of a site. Based on the submitted information and potential level of harm, it is hard to justify that the proposal presents the optimum viable use for the grade I listed Abbey and its immediate setting considering the necessary changes that are suggested to accommodate the proposed use. A use that allows the building to remain as a single entity and the land around it undivided would be consistent with its conservation. There is no justification within the applicant's submission as to why this cannot be achieved. The Design and Access Statement claims the size and location as well as the arrangement of rooms makes the Abbey unsuitable for today's market expectations, but this is not substantiated. Any such assessment would be expected to consider the optimum viable use of the site as a whole (as it remains in a single ownership and is being presented as a single application site), rather than approaching the site as a collection of individual buildings/assets. The optimum viable use may not necessarily be the most economically viable one, but it must be the one likely to cause the least harm to the significance of the asset.

282. Officers consider that given the strength of concern and levels of objection raised by consultees in relation to this part of the proposals, that the applicant's heritage consultant's judgement of low level of less than substantial harm is a significant understatement of the actual level of harm which consultees have suggested is a high level of less than substantial harm to the significance and setting of numerous designated heritage assets.

Replacement of dining hall

283. The modern dining hall structure located to the north of the Abbey is proposed to be removed. Nine new dwellings are proposed to be constructed on the dining hall foundations. This forms part of the detailed part of the application and therefore a set of detailed plans have been provided which shows three terraces of three, three-bedroom two storey, red brick and flat roofed dwellings arranged at right angles to each other in very close proximity to the Abbey. The dwellings and their very modest rear gardens and associated parking court are arranged on top of what is assumed to be the extent of the supporting foundation slab for the dining hall (although no investigations are understood to have taken place to verify their extent or suitability for reuse). Other reports that form part of the submission show different arrangements and indicative design/form of dwellings in this location, however they are all arranged within a similar area of what is assumed to be the dining hall pad foundations.

284. The dining hall structure itself does not contribute to the significance of the site and its sensitive removal is supported by Historic Buildings and Place (Ancient Monuments Society) and Historic England, who advise that the works

would also require scheduled monument consent from the Department for Digital, Culture, Media and Sport (DCMS).

285. All of the conservation consultees however go on to raise serious concerns about the proposal to replace the dining room with residential dwellings. Advising that any new-build structures on the floor slab of the dining hall would have an adverse impact on the setting of the scheduled monument and cause harm to its significance.
286. Historic England more specifically comment that the proposed 'new dwellings would be an incongruous addition to the Abbey House and priory ruins. The houses would detract from the relationship of the Priory and ruins and would result in subdivision of part of the scheduled monument with associated management issues. They would also erode the understanding of the site, where the ancillary buildings to the Colman's house are grouped to the south, and not the north of the property'.
287. Historic England do not consider that replacement structures on the floor slab of the dining hall represents the optimum viable use of that part of the site. They consider that a unique opportunity exists within the redevelopment of the site to better reveal and present the full extent of the abbey church which has not been possible since the 1960/70s, something that the Ancient Monuments Society also supports. Historic England consider that the layout of the currently buried archaeological remains of the western end of the priory church could be marked out at ground level (rather than re-exposed) so that they could be clearly read in relation to the existing ruins, Carrow Abbey and cloister and this would represent the optimum public benefit for the monument.
288. Any proposals to introduce new-build elements within the scheduled monument would require Scheduled Monument Consent (SMC) and would have to meet the stringent public benefit test of paragraph 20 of the DCMS Policy Statement on Scheduled Monuments (2013). Historic England have advised that they would be unlikely to be able to support an SMC application for replacement structures on the dining hall site or recommend to DCMS that SMC should be granted for such a proposal.
289. The council's conservation and design officer also has significant concerns that the introduction of residential development over the ruins of the Priory church would affect the evidential, historic and communal values of the monument and Abbey, and their strong interconnection.
290. The applicant's HTVIA however concludes that the proposed development would offer some enhancement to the setting of Carrow Abbey through the replacement of negative contributors, reinstating the historic detachment of the building. They nevertheless identify some residual harm to the Priory and setting of the Abbey through the subdivision of the grounds as this will disrupt one's appreciation of Scheduled Monument and the grade I listed Abbey.
291. The applicant's heritage consultant goes on to highlight that Paragraph 208 of the NPPF states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. It is the applicant's conclusion that the benefits of being able to deliver a viable scheme that will facilitate the

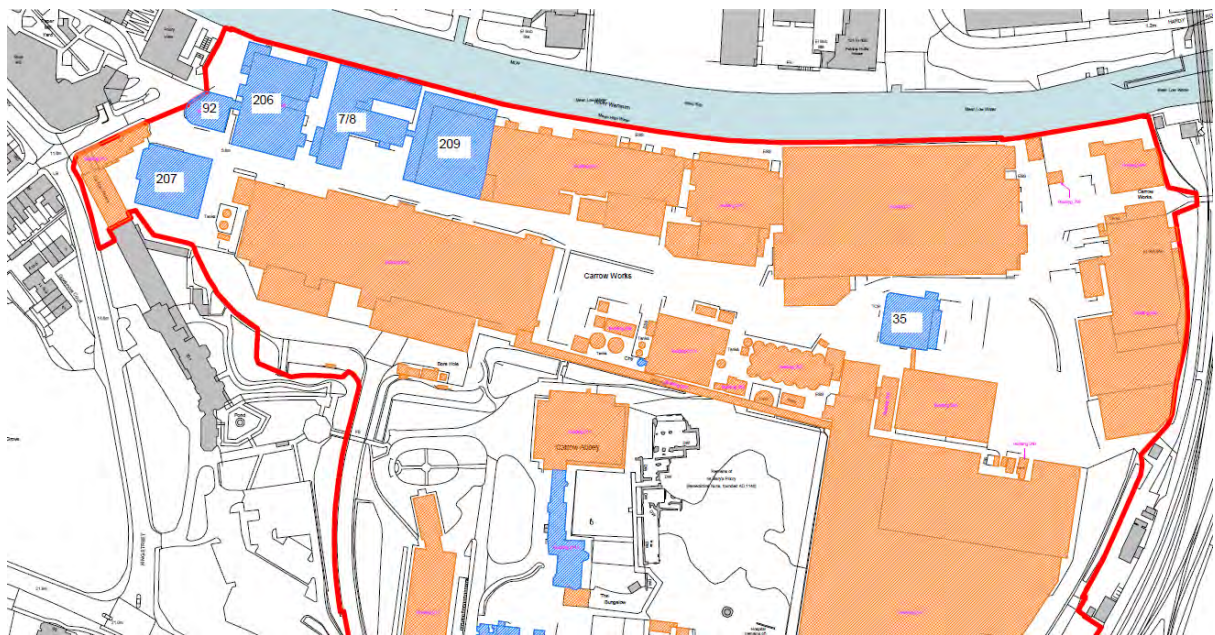
regeneration of the area outweighs the less than substantial harm that they identify to Carrow Priory and its setting.

292. However, it is the judgement of officers, informed by several statutory heritage consultees that the proposal to create a number of separate dwellings on the former monastic site and within Carrow Abbey, subdividing both the monument and house, would result in a level of less than substantial harm at the upper end of the scale, to assets of the highest significance, notably a scheduled monument and grade I listed building.

Adaptations and conversions of industrial blocks on the riverside

293. As mentioned previously, the industrial works was located at a lower site level, adjacent to the River Wensum and several of the buildings, mostly from the later nineteenth century, are grade II listed for their architectural interest, clearly illustrating their industrial function; the historic interest of the Colman's business and group value with other designated buildings.

294. Below is a map extract of part of the site, showing in blue the buildings along the riverside that are proposed to be retained and converted into a range of flexible uses. Building 92, 7/8 and 35 are grade II listed. All buildings in orange are proposed to be demolished.



295. To assess the impact of the proposed adaptation and conversions of Block 92 (Grade II), Blocks 7, 7A, 8A, and 8 (Grade II), as well as the development within their immediate setting including conversions of Buildings 206, 209, 207 and 7 which are all included within the full planning application, more detailed plans, street scene elevations of the proposals and statements of heritage significance would be required. There are specific concerns with regards to the height and design of the proposed extension to the roof of Building 209. The building sits within the setting of a number of designated heritage assets and is currently linked to the listed Block 8. Block 209 already appears visually dominant and an extension of such scale and design would have a harmful impact on the historic setting and negatively affect significant views from the west, such as the one from the locally listed Carrow Bridge. Historic England similarly observe that the three storey roof top addition proposed to this

building could detract from the significance of the historic industrial buildings on the water front.

296. The individual and group value of these assets, their contribution to the street scene facing south and riverside to the north should be considered within the existing architectural and historic context, as well as within the proposed development of potentially greater scale and heights to the east.

Development across the wider site

297. One of the important characteristics of the site is the distinctive characters of the Abbey site and the industrial works. The dramatic change in gradient between the Abbey and works site provided a successful separation between the factory and domestic parts of the site.

298. Development proposed across the wider industrial works site forms part of the outline proposals. Here the considerations are of higher-level details contained within a set of parameter plans which look to determine land use, proposed building heights, public open space, access and movement and extent of demolition. A detailed Design Code also forms part of the outline consideration.

299. There are concerns regarding the heights and footprints of the proposed blocks and how these would impact the character of the scheduled monument, the setting of other existing designated heritage assets (both within and outside of the site) and significant views within and beyond the application area. The 'Assessment of Operational Visual Effects' (Section 9 of the HTVIA) display how the new development would inevitably alter existing views. Some of these views raise significant concerns with regards to harmful impact on the setting of Carrow Abbey, Priory and views from Carrow House. Whilst a change is anticipated and to be expected, it appears that further studies would be necessary to ensure that the impact is carefully assessed, and potential harm mitigated in order to preserve the secluded and tranquil character of the unregistered historic park and garden of local significance which accommodates this unique cluster of heritage assets.

300. Historic England advise that there is clearly more scope for considerable development on the works site. However, care should be taken as any visual intrusion from tall buildings on the works site, into the historic core of the site would be harmful to its secluded and domestic character. Verified views currently appear to show the outline of the development rising above the tree line in views from the Abbey gardens. Overly dominant tall new buildings would also detract from the historic industrial structures on the riverside. Clearly, the impact of heights and their specific arrangement in proximity to more sensitive heritage assets needs further careful consideration before the height parameter plans and content of the Design Code can be accepted.

301. Putting concerns around height of new elements aside, there is also a concern that the location and interrelationship between individual assets has not been given sufficient consideration. New development is proposed in areas which interferes with the relationship between existing assets and interrupts the way elements are accessed and appreciated by the wider public. For example, the sunken garden could become separated from other assets by intervening private uses and although forming a part of the site which will act as public

open space it would appear difficult to access with limited linkage and legibility from other wider areas of open space.

302. The repositioning of roads and access routes around the Abbey appears to interfere with, rather than enhance and better reveal the significance of the ruins, the principal approach to the sunken gardens from the east, and the established links with other heritage assets within this historic setting. The link with Carrow House and its grounds is not shown or integrated to the proposal. Whilst opening up the Abbey grounds and the scheduled monument to pedestrian access and further enhancing the assets' accessibility and interpretation is strongly supported, it is recommended that introduction of new public highways should carefully consider the existing heritage assets on site, the potential impact on management and maintenance of the assets, and their relationship with other buildings and sites within the application site and beyond.
303. There is limited/no information as to how some of the wider heritage assets fit into the wider plans for the site. Information regarding the air raid shelters is limited and does not seem to form part of the scope of works for the development proposed. This raises questions around long term management and maintenance of some of the assets and the ability to appreciate their contribution to the history and use of the wider site and its gardens and any heritage interpretation, something that also concerns the Norfolk Gardens Trust.
304. On a specific point relating to the detailed part of the application, the formation of a new vehicular access on to Bracondale would require the removal of a section of flint boundary wall (a continuous feature along much of Bracondale, as identified in the Bracondale Conservation Area Appraisal) and a number of trees and vegetation, which would have adverse impacts on the character and appearance of the Bracondale Conservation area that remain unquantified by the applicant.
305. Finally, there are some areas of the site that are part of the outline application that conservation consultees consider further detail should be provided. This includes development within the current car park area on the southern approach to the Abbey and Gardeners cottage and development in place of the technical block to the south west of the Abbey. The concerns here surround development which is replacing existing development to be removed which contributes to the significance of the 'country house' and the approaches to the Abbey once it is opened up through demolition of existing structures. There is detail within the Design Code around these areas and clearly how any development in these areas impacts on the setting and significance of the Abbey and its grounds in particular need further detailed consideration. However, at this stage there are significant issues with the proposals surrounding the use of the Abbey and the dining hall removal itself that remain the primary focus to be resolved before a holistic approach to development in these wider areas can be fully considered.

Heritage Conclusion

306. The Carrow Works site presents a once in a lifetime opportunity to create a vibrant new quarter for the city of Norwich that responds to and enhances its rich historic environment. A holistic approach to develop a scheme which seeks to sustain and enhance the significance of this unique collection of highly

significant heritage assets would do much to create a truly distinctive and successful new quarter for the people of Norwich. Although heritage consultees support the principle of regenerating the site the current submission fails to respect or appropriately respond to the sites heritage by re-purposing the sites heritage assets and opening the site up to public use in a way which improves their setting and maintains an appreciation of their significance.

307. Paragraph 205 of the NPPF requires ‘great weight to be given to a designated heritage asset’s conservation, and the more important that asset, the greater the weight should be.’ Because of the exceptional importance of the site reflected in the scheduling, grade I listing and other listings and designations, great weight should be given to its conservation, irrespective of the level of potential harm to its significance.

308. The NPPF at paragraph 206 requires there to be a clear and convincing justification for any harm to, or loss of, the significance of a designated heritage asset. The individual buildings comprising the application site are distinguished by their significant architectural and historic interests; moreover, the group value of all heritage assets deriving from their links and associations with each other and this unique context, further reinforces their significance. The proposals have been found to result in high levels of harm to the setting and significance of a number of designated and non-designated heritage assets. The high levels of individual and cumulative harm caused is ‘less than substantial harm’, which is without clear and convincing justification and is not sufficiently outweighed by public benefits, and as such the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024, policy DM9 of the Development Management Policies Local Plan 2014, paragraphs 201, 203, 205, 206 and 208 of the NPPF and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Main Issue 6. Design

309. Key policies and NPPF sections –GNLP2, GNLP3, GNLPSTR.01, DM3, NPPF sections 8, 11 and 12.

310. The NPPF says in paragraph 131 that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.” Paragraph 139 says “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design”.

311. Revisions to the NPPF in December 2023 further emphasised the importance of ‘beauty’ in design. However, there is still no definition of beauty in the glossary to the NPPF. The Oxford English Dictionary definition is: “A combination of qualities, such as shape, colour, or form, that pleases the aesthetic senses, especially the sight”. This implies that beauty elicits a positive emotional response, but this can be subject to a considerable amount of subjectivity. Beauty is treated as a component of well-designed places in the NPPF and a place can be considered well-designed in planning policy terms if it meets relevant design policies and has been assessed using processes that are endorsed by government. This assessment is structured around the government’s framework for design evaluation as expressed in the National Design Guide and National Model Design Code.

312. Developments should be sympathetic to local character and history and establish or maintain a strong sense of place (NPPF paragraph 135). Policy DM3 states that all development will be required to be designed with regard to the character of the surrounding neighbourhood and the elements that contribute to its overall sense of place and goes on to set out the design principles against which development proposals will be assessed. Adopted development plan policies along with the NPPF therefore establish a strong basis for schemes which are poorly designed and which fail to take the opportunities for improving the character and quality of an area to be refused planning permission.
313. Policy GNLP2 requires development proposals to create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes). The council does not currently have a design code in place for this or any other part of the city. The planning application however is supported by a detailed site specific Design Code which has been brought together by the applicant's project team to inform the outline part of the application in particular. This is clearly a detailed document that attempts to offer clear design guidance for the development when considered alongside the Design and Access Statement and outline parameter plans. The NPPF paragraph 134 promotes the production of design guides and codes, including those produced by developers in support of their planning application. It is not clear in this instance whether effective community engagement suggested in the NPPF has taken place as part of the production of the document. There is also a lack of reference within the applicants Design Code to the governments National Design Guide or National Model Design Code which are intended to inform design process and the tools required to achieve the high quality places that the NPPF requires the development process to strive to achieve. The local planning authority was aware of the production of the document, however opportunities to review and engage in constructive feedback both at pre-application and formal planning application stage have been limited due to an unwillingness of the applicant to engage in discussions. As a result, although there may be details within the code that could be agreed, all of the detailed content of the document cannot be agreed at this time.
314. The applicant's Design Code builds upon the submitted outline parameter plans and there are fundamental elements of those plans that are not agreed. There are also some observed conflicts between the parameter plans and the Design Code to the extent that approving the high level content of the parameters plans would render some of the principles and elements of design detail that the Design Code is seeking to agree not possible and vice versa.
315. The Design Code for example contains a Regulatory Plan which is an integral part of the Design Code and informs all subsequent sections of the Code and all reserved matters applications must comply with. The Regulatory Plan is based on an access strategy that the highway authority does not currently find acceptable.
316. For a mixed use development of this scale and strategic importance assessment against the Building for a Healthy Life Assessment Framework and regard to outcomes of an independent design review panel would be particularly important as paragraph 138 of the NPPF suggests. There is nothing within the applicant's submission however that suggests that either of

these important review and evaluation mechanisms have been utilised to inform the design evolution of the development. However, given the significant concerns around many interrelated aspects of the application and the lack of discussion and engagement from the applicant and their project team it was not considered necessary to refer the scheme through such design review mechanisms. The scheme is significantly poor such that it was felt these initial conclusions on design could be drawn by the local planning authority.

317. More of the fundamentals of the application surrounding heritage and access and movement need to be resolved together with any necessary amendments to the Design Code before the beautiful and well-designed exemplar of high quality, high density and locally distinctive design which respects its context and setting can be confirmed to be achieved on this site. While those issues remain unresolved it cannot be concluded that the design of the development in its entirety fully respects or enhances the character and context of the local area. The application is therefore contrary to policies GNLP2, GNLP3 and GNLPSTR.01 and DM3 and the design principles as set out in section 12 of the NPPF.

Main Issue 7. Transport and movement

318. Key policies and NPPF sections – GNLP2, GNLP4, GNLP7.1, GNLPSTR.01, DM1, DM3, DM12, DM13, DM28, DM30, DM31, DM32, NPPF paragraph 8 and Section 9.

319. The application proposes a significant level of new development to the southeast of the city centre on one of the main approaches into the city from the southern bypass A47 and A11. Paragraph 109 of the revised NPPF states 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' Policy DM28 in accordance with the NPPF encourages sustainable travel - requiring new development to incorporate; cycle and pedestrian links, maximise accessibility and permeability, appropriate and safe levels of parking, travel planning and car club provision.

320. The location of the site at the southeastern edge of the city has the potential to afford a high degree of accessibility by all modes of travel, including by walking and cycling, local and county bus routes and by car. The proximity of the site to; employment, shops, a wide range of facilities and services, creates suitable conditions for promoting sustainable travel behaviour by both future occupiers of and visitors to the development. Policy GNLP2 states that proposals should ensure safe and convenient access for all, encourage walking, cycling and public transport to access on site and local services and facilities.

321. The comprehensive re-development of this site provides the opportunity for further improving access to this part of the city. Improvements to further promote and prioritise active travel between the city centre and the Broads at Whitlingham Country Park as the GNLP site allocation policy GNLPSTR.01 requires are a fundamental consideration for any new development at this site.

322. The site has historically had very limited public access. For security reasons access for vehicles, cycles and pedestrians has been limited to gated access via the main site entrance from the Martineau Lane/Bracondale roundabout. At points in the past there has also been access to the site for all

from Papermill Yard and pedestrian access from Carrow House via pedestrian foot bridge and emergency vehicular access from the site into the car park for Carrow House. However, all of these accesses are now closed, although more limited access rights (pedestrians/cyclists and emergency vehicles) are understood to remain at the Papermill Yard access point.

323. Transport and access are matters scoped into the EIA and impacts are considered in Chapter 7 of the Environmental Statement. A Transport Assessment (TA) has also been submitted with the application. Even though paragraph 117 of the NPPF suggests that all developments that will generate significant amounts of movement should provide a travel plan so that likely impacts of the proposal can be assessed, no supporting travel plan has been provided and the applicant maintains that such information can be secured by planning condition.
324. Limited discussions took place between the local planning authority and highway authority and the applicant's consultants around the significant matter of providing an appropriate access strategy for the proposed development including a visit to site, prior to the submission of the planning application. A great deal of the issues that were raised prior to submission have either not been acted upon or have not been considered in sufficient depth. As a result, the Transport Assessment that has been provided in support of the application has been found by the highway authority to be deficient in a substantial number of areas as discussed in the remainder of this section. Therefore, the development proposals and access strategy appear to have unfortunately been informed without adequate levels of appropriate information and evidence about the site and the operation of the local highway network.

Vehicular access

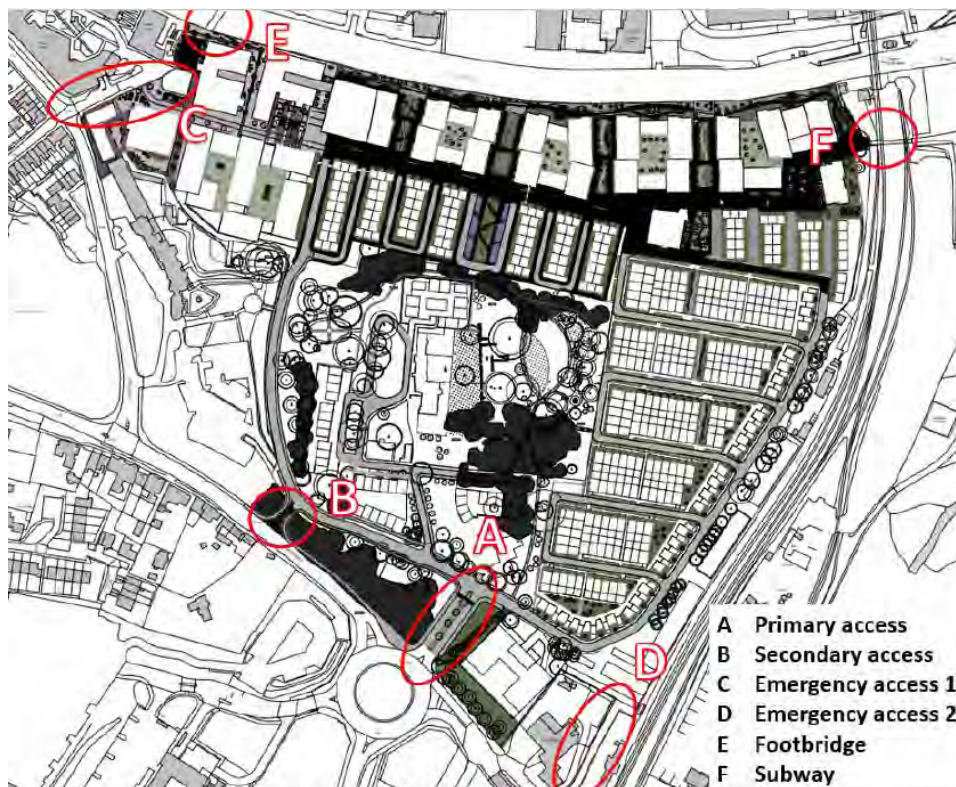
325. Located directly off the outer ring road and due to the former/existing site use, the focus of access to the site to date has centred around access for vehicles. Although access by other non-car modes via this point is possible there is a clear need to improve and seek to increase priority of access to the site by public transport and non-car modes in this location.
326. It is recognised that at times in the past the site has produced quite significant trip generation associated with a significant workforce working on a shift basis, together with associated HGV traffic. That intensity of use however declined in more recent years and although still in employment use the site currently generates trips at much-reduced levels compared to previous peak site usage. The highway authority in assessing the applicant's submission has some reservations around some of the assumptions and adjustments that have been made to the trip generation data. Junction capacity assessments have not been provided in support of some of the report recommendations and full modelling of junctions has not been carried out to inform suggested off-site highway mitigation measures.
327. The Transport Assessment suggests that primary access to the site will be via a remodelled existing access from the Martineau Lane/Bracondale roundabout to the south. The access will consist of two separate but parallel 5.5 metre wide carriageways separated by a 3 metre wide central verge together with a 3 metre wide footway/cycle way provision alongside each carriageway. The applicant maintains that the arrangement proposed for this access will be sufficient to act as a single point of access to serve the quantum

of development proposed and will provide sufficient resilience to allow access to the site to be maintained in the event of one carriageway becoming blocked.

328. The Highway Authority however do not consider that the location of the site at a busy part of the strategic road network is suitable for the arrangement proposed to serve as a single point of vehicular access to the site together with adequate access arrangements for pedestrians and cyclists, for the amount of development proposed. They advise that the access layout would result in a highway safety concern and for this reason is not acceptable.

329. In addition, what is described as a 'secondary access' is proposed onto Bracondale, approximately half way between the roundabout and the King Street junction. The applicant's consultants suggest that an all movements junction 'would not be desirable' here and therefore a left turning exit design is proposed which they suggest would restrict general use of this secondary access resulting in it being lightly used under normal conditions. It is understood that the primary purpose of this junction is to provide an alternative temporary access for all should the main access be unavailable. As Bracondale is a strategic transport route, an access in this specific location that introduces additional slowing, stopping, and turning movements at this corridor of movement would not be acceptable and is considered a highway safety concern. The highway authority considers that not only is the principle of a junction at this location unacceptable, the junction form proposed is also inappropriate. Also of note here is that the formation of a new access in this location would require the removal of a section of flint boundary wall (a continuous feature along much of Bracondale, as identified in the Bracondale Conservation Area Appraisal) and a number of trees and vegetation, which would have consequential adverse impacts on the character and appearance of the Bracondale Conservation area.

330. An extract showing the applicants access strategy is reproduced below to provide a visual aid of where the access points are located.



331. The applicant maintains that a single point of access to the site from the roundabout (point A) of the design proposed should be an acceptable sole means of access to the site for vehicles. The 'secondary' access that is also proposed (point B) can be secured without the need for agreement with third parties. Policy GNLPSTR.01 is quite explicit with its requirement for a second point of access, suggesting access to King Street, although a Transport Assessment would be required to determine the exact location of a second point of access. However, in the absence of a satisfactory Transport Assessment, the highway authority maintains at this time that two, all movements, all vehicle accesses to the proposed development are required to ensure resilience of access to the site.

332. What is clear however, is that the vehicular access(s) to the site, its type and location need to be considered equally within an access strategy which considers all other access modes, existing provision and improvements required to create a 'sustainable' development.

Parking strategy

333. The Transport Assessment goes on set out the car parking provision as summarised in the table below, alongside the parking standards set out in the current Norwich Development Management Policies Local Plan;

334.

	Proposed parking provision in planning application	Norwich City Council Policy DM31 requirement <i>(based on an 'accessible' high quality public transport corridor or 100m of a district centre)</i>
Flats	0.20 spaces per dwelling	Same as for houses.
Houses	1 space per dwelling 1 EV charging point in all communal unallocated parking areas EV charging in all garages	Min – 0.5 spaces per dwelling Max – 1.33 spaces per dwelling. Min 25% 'on street' or in communal parking areas and not allocated. Not more than 20% provided as individual garages.

	Proposed parking provision in planning application	Norwich City Council Policy DM31 requirement <i>(based on an 'accessible' high quality public transport corridor or 100m of a district centre)</i>
Commercial (Class E)	1 space per 500sqm 5% disabled	Min – 1 space per 500sqm. (Based on former Class A retail uses) 5% disabled 5% parent and child Secure motor cycle parking at an amount equal to 5% of level of car parking Max – 1 space per 20sqm
Industrial (Class B2/B8)	1 space per 750sqm 5% disabled	Min – 1 space per 1000sqm Max – 1 space per 50sqm
Food store	1 space per 50sqm	Same as for Class E

335. A total of 734 car parking spaces are proposed across the whole site, with provision for both residential dwellings and commercial space. The parking provision suggests 129 spaces for a proposed food store and employment. This leaves 605 spaces for all of the residential units, an average of 0.3 spaces per dwelling. Within some housing typologies, there is private parking provided within a garage. For flats, the parking is located within central car park areas.

336. Policy GNLP2 and policy DM32 of the Norwich Development Management Policies Local Plan suggest in the most accessible locations in Norwich, regard should be given to providing low or car free housing.

337. The proposed car parking levels fall generally within the minimum and maximum ranges for relevant use classes for development in this part of the city if the site was to be considered as being on a high quality public transport corridor. For this to be the case improvements to access to public transport provision will be required as discussed later. The applicant describes the development as a 'low car scheme' with parking supplemented by car club access and cycle parking in accordance with the councils parking standards. The level of car parking for the apartments is particularly low and further detail would be required to demonstrate that it is appropriate in this location alongside appropriate and quite significant improvements to active travel measures to reduce car dependence before it is accepted at this site (covered in more detail in the remainder of the section).

338. A number of consultees have commented that due to the proximity of the site to Carrow Road football stadium which frequently attracts over 25,000 supporters and based on evidence from residential sites in the area (some as far from the site as Trowse village), managed parking restrictions are likely to be required across the site to prevent parking conflict and the blocking of access for emergency vehicles and active travel users. The TA does not acknowledge that the proximity to the football stadium could raise these issues (with or without a bridge connection across the River Wensum), nor the sites proximity to a large scale employer at County Hall and a large district retail centre at Riverside which could also create parking pressures in and around the site, and this would need to be dealt with through a combination of site layout and travel management/parking management/road adoption matters.
339. The closest car club vehicles are currently located adjacent to Carrow Road Stadium and on King Street. The proposals suggest provision of a new car club and space in an accessible location on a ratio of one space for every 200 dwellings (9 spaces) initially increasing to 1 space per 100 dwellings subject to demand (18 spaces). Although not perhaps necessary to establish a new car club, expansion through additional spaces or contributions to expand the vehicle provision within the existing car club arrangements will be required for a development of this scale.
340. The detailed aspects of the development relating to transport and movement that form part of the full application are confined to the principal means of access and primary internal road, plus associated public spaces and public realm along this road. The primary street and bus route is referred to several times throughout the TA as a perimeter or loop road which will use the existing Carrow Works carriageway with modification to provide footways. Taking this approach of designing the development around an existing road originally designed for access around an industrial site could lead to the highway infrastructure presenting a dominant barrier to development. Rather than designing a layout with a pattern of beautiful streets that support healthy and sustainable communities, through safe, legible, walkable areas as a starting point.
341. As a significant part of the site forms part of the outline proposal it is not possible to consider in detail elements of the development such as road and street layout or parking location. The Design Code relates primarily to the outline aspects of the application and contains sections on the principles of street design including street sections, surfacing, landscaping and parking arrangements, but no specific layout. The Design Code contains a Regulatory Plan which informs all subsequent sections of the Design Code which all reserved matters applications must comply with. The Regulatory Plan is however based on an access strategy that the highway authority does not currently find acceptable.

Pedestrian, cycle and emergency vehicle access

342. National Cycle Network Route 1 (NCN1) runs past the south and west of the site from the city centre. The route is part designated shared path and part signed on road provision on a busy part of the road network that often experiences queuing traffic due to congestion.
343. An access for pedestrians, cyclists and emergency vehicles will be provided from Papermill Yard, off of King Street. Although Papermill Yard is private in

part it is understood that access rights remain to the Carrow Works site, but that they do not extend to providing general vehicular access.

344. There also exists an emergency access in the southeast of the site (currently gated, overgrown and un-used) to the east of Carrow Fire Station. The access is no greater than 5.5 metres in width and it is proposed could serve as a further pedestrian/cycle link which could be used by emergency vehicles.
345. Policy DM3 states that 'proposals should be designed to provide a permeable and legible network of routes and spaces through the development, which takes account of public accessibility, links effectively with existing routes and spaces and minimises opportunities for crime, disorder and anti-social behaviour. The public realm should be designed so that it is attractive, overlooked, safe and secure.'
346. More specifically related to this site, policy GNLP7.1 and GNLPSTR.01 emphasise sustainable accessibility and traffic restraint which allows for connectivity and permeability within and between the ENSRA sites and beyond.
347. A key element of policy GNLPSTR.01 is a high quality east-west pedestrian/cycle route through the site connecting King Street (and the city centre) to the railway underpass (and onwards to the Broads at Whitlingham Country Park). The application in this respect proposes a semi-pedestrianised 'balanced street' which serves as a means of vehicular access, while making provision for pedestrians and cyclists. The northwestern most part of the route is however proposed for pedestrian and cycle access only.
348. The applicant's illustrative masterplan, part of the Design Code lists 'new and improved walking and cycling connections through the site including a new foot/cycle bridge over the river' as one of the key features. The application makes reference within its supporting Transport Assessment that the bridge forms part of the development, with land safeguarded within the site to ensure the southern bridge landing point. However, the document acknowledges that approval from a third party will be required in respect of the landing point on the northern side of the river. Also, there is no information with regards the detail of the bridge, its exact location or its design, with a suggestion that the delivery of the bridge is expected to be secured by S106 agreement.
349. Similarly, reference is made within the Transport Assessment to the upgrading of the railway underpass/subway to provide a link to the Deal Ground forming part of the proposed development which is expected to be secured by S106 agreement.
350. Another key element of policy GNLPSTR.01 involves opening up the riverside for public access, via provision of a riverside walk. The parameters plans and other illustrative material shows an 'indicative' route along most of the riverside edge to the site, with the exception of a short section alongside existing grade II listed building 7, the 'F block' which is to be retained. There is no suggestion as to whether opportunities to provide a continuous route along the whole riverside frontage have been explored by taking the route within the building or by provision of a cantilevered walkway, which would deliver a much more satisfactory and more legible route for users.

351. The TA explains that 'the site is well placed to promote travel on foot and by cycle and goes on to state that the development will deliver a new footbridge over the River Wensum and open up the subway beneath the rail line, which will reduce travel distances to key facilities'. However, there is nothing within the submission to secure the delivery of these extremely important linkages or suggest that any discussions have taken place with any adjacent landowners to agree such linkages in principle, therefore they remain nothing more than an aspiration. This remains a fundamental omission from the submission. As Active Travel England suggest 'the applicant must demonstrate an absolute commitment to the expansion of active travel routes' and these connections points are a quite fundamental part of achieving this.

352. There is a clear policy requirement through policy DM3 and GNLP4, GNLP7.1 and GNLPSTR.01 to secure accessibility, permeability and linkages to, from and throughout this development. However, based on the information available within the submission this has not been clearly demonstrated as being possible.

Public transport

353. With regards public transport provision there are three bus stops located within a 5 minute walk from the centre of the site. One of the south bound stops on the section of Bracondale towards Trowse village is only served by a limited number of local services. The other two stops (one north bound into the city and one south bound) are served by a greater number of bus services that pass the site and provide access to the city centre and out of the city and to the east of the county, of a frequency of no greater than every 30 minutes. However, to make the development accessible to public transport it is suggested that a circular 1.2 km bus route around the sites perimeter road with three bus stops at 400 metre intervals will ensure access to a bus service within 200 metres. They estimate that this will require a five and a half minute extension to a bus service which passes the site and although they suggest that contact has been made with the relevant bus operators no formal agreement to provide a service has been provided by the bus companies.

354. Norwich Railway Station is located around 1.5 kilometres to the north of the site, which is a 20 minute walk or 8 minute cycle from the main site entrance. Much of the existing cycle and walking route however is alongside busy sections of road which does not currently make for a particularly pleasant user experience. Network Rail are also concerned that there is no mention in the submission of a travel demand forecast for Norwich Station to determine potential impacts on passenger capacity at Norwich Station.

355. The highway authority has advised that the Transport Assessment provided with the application is deficient in a substantial number of areas. It fails to demonstrate an acceptable access strategy; it does not justify development trips or provide full traffic flow diagrams to assess development impact or identify appropriate off-site highway mitigation. It also includes assumptions based upon delivery of infrastructure that is dependent on third party land. As a result, the Transport Assessment provided fails to demonstrate that the highway network would continue to operate safely without severe residual cumulative impact and in accordance with the requirements of paragraph 115 of the NPPF refusal of the application is recommended on highways grounds.

356. The application is not supported by sufficient highways and transport information to demonstrate that the proposed development and its points of vehicular access in particular will not be prejudicial to the safe and satisfactory functioning of the highway, contrary to policies GNLP7.1 and GNLPSTR.01, DM30, NPPF paragraph 8 and Section 9.

357. The proposed development does not provide adequate access or new or improved on and off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to encourage walking and cycling/wheeling to connect with and permeate through the site and link with adjacent sites and local services. It also fails to demonstrate that improved public transport access to the site can be achieved, to maximise sustainable transport opportunities which together could lead to reduced car dependency and a corresponding reduced level of car parking provision across the site. , The application is therefore contrary to policiesGNLP4, GNLP7.1, GNLPSTR.01, DM3, DM12, DM13, DM28, DM30, DM31, DM32 and NPPF paragraph 8 and Section 9, including paragraph 115.

Main Issue 8. Social and economic infrastructure

358. Key policies and NPPF sections - GNLP4, GNLP6, GNLP7.1, DM1 and NPPF section 8.

359. The Environmental Statement (ES) submitted with the planning application includes an assessment of the socio-economic impacts of the proposed development (Chapter 15). The assessment looks at impact relative to a baseline position in terms of the demographic and economic profile of the local population and provision of education, healthcare facilities and community facilities including open space, play space and sports provision across the area surrounding the site. The assessment examines the potential effects of the development over the construction and operational phases.

Employment

360. As the site is currently largely vacant a rough figure based on the Employment Densities Guide has been determined for employment within warehouses, which could accommodate 416 jobs. Approximately 416 FTE jobs have already been lost from the site due to the closure of the Unilever factory. However, in the past, operations at the site will have generated jobs for a significantly greater number of employees.

361. The ES suggests that employment will be generated through the construction of the proposed development which the ES has identified will provide 73 FTE jobs (not sure if this is a figure for the entire 10 year period or an annual figure). The proposed development is reported to bring forward net additional operational employment (following displacement, leakage and multiplier effects) of 320 – 1,025 FTE jobs associated with the new commercial and industrial areas of the development. The ES suggests a minor beneficial impact in the short term to moderate beneficial impact in the long term of employment generation. Officers have questions around some of the data and the age of figures used but it has not been possible to resolve these queries.

362. As a mixed use development the hybrid planning application proposes a flexible mix of business and commercial (including retail uses), hotel, residential institution, learning and non-residential institutions, local community

uses, general industrial, storage and distribution. However, the exact additional employment contribution that the development provides compared to the existing/current site usage has not clearly been demonstrated. If accepting the applicant's figures for net additional operational employment, and taking the higher end figure, over 1,000 jobs would contribute in a relatively substantial way towards the 4,100 jobs target for East Norwich (ENSRA). The opportunities for jobs creation lacks some certainty and therefore more limited weight should be given to the contribution that the development would make in meeting the requirements of policy GNLP7.1 and GNLPSTR.01.

Crime

363. The ES baseline assessment identifies the site to be in the 40% least deprived areas nationally in terms of crime deprivation. The ES suggests that the development will follow design principles to discourage crime and promote building security through maximising natural surveillance, providing territorial reinforcement and ensuring well maintained places are provided by a management company.

364. Norfolk Constabulary consider that the proposed development represents a very large-scale development that will significantly increase pressure on police resources. To enable Norfolk Constabulary to enhance police infrastructure to support the NPPF aim to create safe communities and ensure that crime and disorder, and the fear of crime, do not undermine the quality of life in the new development, Norfolk Constabulary consider it necessary and justified that a contribution based on a development of up to 1,859 dwellings of £168 per dwelling (in total £312,312 - index linked) is provided by the developers and should be delivered by s106 agreement. This will ensure that the developer contributes to additional necessary infrastructure required to maintain and deliver a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime) for future residents and to meet planning policy requirements.

365. Policy GNLP4 deals with 'other strategic infrastructure' and states that 'The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including Police infrastructure'. The policy refers to an appendix which sets out the infrastructure requirements to serve growth, which will be 'provided by a variety of organisations through varied funding sources' and therefore does not explicitly suggest that such infrastructure will be funded directly by the development in the plan. Any additional contributions for the funding of facilities secured through planning obligations will need to take account of development viability; be necessary to make the development acceptable in planning terms; be directly related to the development; and be fairly and reasonably related in scale and kind to the development. Potential contributions to the provision of police infrastructure would need to be balanced against requirements for other essential infrastructure and community benefits, including provision of affordable housing.

Education

366. Policy DM1 requires provision to be made for accessible education opportunities and NPPF paragraph 99 requires sufficient choice of school places through creation, expansion or altering schools to meet the needs of existing and new communities.

367. The GNLSP strategic policy GNLSP4 requires school capacity to be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including primary schools on strategic development sites. Policy GNLSP7.1 confirms that an area wide Supplementary Planning Document (SPD) will provide the framework for seeking social infrastructure and site allocation policy GNLSPSTR.01 specifically requires at point (h) 'Provision of a serviced site for a two form entry primary school'.
368. The baseline education capacity as set out in the applicant's Environmental Statement predicts that the proposed development could generate a total of 954 children. Of these pupils, 489 will be aged 3-4 years (52%), 330 will be aged 5-11 years (34.7%) and 139 will be aged 12-18 years (12.4%).
369. The baseline assessment identified capacity for an additional 478 pupils across the 7 primary schools within a 1.5-mile radius. The figures suggest that these will have sufficient capacity for the 330 pupils brought forward by the proposal.
370. The same assessment suggests the proposed development is anticipated to bring forward 139 pupils aged 12 to 18 years who will require secondary school places. The baseline assessment identifies that the two secondary schools within 2 miles of the site, currently have capacity for 873 secondary school students with an average capacity of 58.8%. Therefore, the figures suggest that there is sufficient capacity to accommodate the additional secondary school pupils.
371. Again, the same assessment suggests the proposed development is anticipated to bring forward a number of new pupils who will require SEN (special educational needs) school provision. The report suggests that given the existing provision and the funding in place for two new schools, the total number of these pupils is likely to be accommodated within the existing specialist provision.
372. The ES also identifies that there is unlikely to be sufficient early years education capacity to accommodate the potential 486 additional 3–4-year-olds in the area resulting from the proposed development.
373. The ES does go on to consider cumulative impacts of the development alongside committed developments at Anglia Square (extant planning permission exists), Deal Ground (with an extant outline planning permission) and Land to the north of Carrow Quay (now complete). The cumulative schemes are anticipated to bring forward 893 pupils aged 3 to 7 years; 594 pupils ages 5 to 11 years; 240 pupils aged 12 to 18 years; total 1727 pupils. It identifies that there will be a permanent Moderate Adverse to Major Adverse impact in the long term on early years and there will need to be additional provision. Also, there is anticipated to be a Moderate Adverse long term impact on primary schools with provision of additional school places required. Whereas secondary schools have sufficient capacity with an anticipated impact to be permanent 'Moderate Beneficial' in the long-term as it is likely to increase numbers within local secondary schools that have capacity. The ES proposes that education impacts will be mitigated through provision of S106 contributions.
374. To supplement their submission an Education Impact and Mitigation Assessment was undertaken and provided by consultants on behalf of the

applicant. The information within this report appears to be more specifically related to Norwich, with use of some figures obtained from the local education authority. The report concludes that there will be a surplus of places in primary and secondary schools by the academic year 2025/26 through to 2031/32, summarised below;

- 2025/26 - Primary school places (within 2 mile walking distance) = 690
- 2027/28 - Primary school places (within 2 mile walking distance) = 557
- 2029/30 - Primary school places (within 2 mile walking distance) = 533
- 2031/32 - Primary school places (within 2 mile walking distance) = 475
- 2025/26 - Secondary school places (within 3 mile walking distance) = 457
- 2027/28 - Secondary school places (within 3 mile walking distance) = 321
- 2029/30 - Secondary school places (within 3 mile walking distance) = 523
- 2031/32 - Secondary school places (within 3 mile walking distance) = 815

375. It however only looks at forecast capacity within existing local schools. It does not consider within these forecasts the specific demands that the proposed development or the cumulative impacts that other large scale committed developments in Norwich will have on capacity within those local schools as the ES does.

376. The applicant has chosen to concentrate on the forecasting surplus identified in their Education Impact and Mitigation Assessment to suggest that there are no constraints regarding local education infrastructure to necessitate the provision of a two form entry primary school on the site. However, if any shortfall of places is identified they suggest this can be funded through CIL receipts.

377. Together the information provided around education within the ES and the Education Impact and Mitigation Assessment should be considered with caution. Many of the figures around school capacity quoted within the ES vary by a significant margin from those quoted within the Education Impact and Mitigation Assessment and those provided by Norfolk County Council as education authority. The methodologies used within the ES are very generalised and do not relate specifically to the area (for example Greater London Authority pupil product ratios are used). As a result, it appears that the number of children generated from the development is likely to be an overestimate, but also the assessment of existing school capacity is an overestimate using a much wider catchment of schools than the education authority considers relevant and does not take into account matters such as parental preference.

378. The table below summarises the differences in the data provided by the applicant and that provided by the local education authority.

Children generated from development	Applicants' data within Environmental Statement	Norfolk County Council data (based on delivery of 904 homes, does not include provision associated with 1 bed units and 50% contribution from multi bed flats)
Early Education	489 (3-4 years)	72 (2-4 years)
Primary	330 (5-11 years)	254 (4-11 years)
High School	139 (12-18 years)	131 (11-16 years)
Sixth Form (16-18 years)		14
SEND (special educational needs and disabilities, 0-25)		9.04
TOTAL	958	471(+9.04)

379. Norfolk County Council Children's Services have provided detailed comments on the application, including information of children generated from the development and capacity at existing schools. They use local knowledge and Norfolk specific data, and their modelling is applied consistently across all sites in Norfolk. They have considered the development alongside existing commitments at Anglia Square and Deal Ground and conclude that the development will require mitigation for;

- 15 Early Education places,
- 254 Primary School places,
- 14 Sixth Form places and
- a pro-rata SEND contribution.

380. As a result, they advise that land for a new two form entry (2FE) Primary School will need to be secured through a Section 106 agreement. As the application does not currently provide this required mitigation in a location agreed with the County Council, Children's Services object to the application.

381. Work that has taken place to date on the ENSRA, the GNLN policies, the site masterplan and draft SPD has consistently identified a need for new social infrastructure including a new primary school. Children associated with a development of the scale of East Norwich, together with other commitments cannot be accommodated within existing schools or through increasing capacity at existing schools. The children's needs should be met on site within a new school which meets part of the social infrastructure needs of the development as set out in policy GNLNSTR.01.

382. There is no provision within the application for social infrastructure in the form of a serviced site for a two form entry primary school on this strategic development site. The application is therefore contrary to policy GNLP4, and GNLPSTR.01 which have parallels with the requirements of paragraph 99 of the NPPF which requires sufficient choice of school places with great weight given to the creation, expansion or altering schools to meet the needs of existing and new communities. The application is also contrary to DM1 which requires provision to be made for accessible education opportunities.

Healthcare

383. Policy DM1 requires provision to be made for improved health and well-being opportunities. Also NPPF paragraph 97 requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.

384. Policy GNLP4 requires improvements to healthcare infrastructure. Policy GNLP7.1 confirms for the ENSRA that an area wide SPD will provide the framework for seeking social infrastructure and site allocation policy GNLPSTR.01 specifically requires at point (i) 'Provision of land for a health facility sufficient to serve the East Norwich development as a whole'.

385. The ES baseline assessment and Health Impact Assessment identifies 8 GP surgeries within 1.5 miles of the centre of the site. The proposed development will increase the GP-to-patient ratio to 2,024 patients per GP which is above the best practice of 1,800 patients per GP. Therefore, the report identifies that there is not sufficient capacity to provide for the additional residents that the development will create, resulting in a permanent, long term Minor Adverse impact.

386. Limited information is provided on adult social care, except to acknowledge that a proportion of the average 4,461 residents that the development will create, are likely to use Adult Social Care services, resulting in a permanent, long term, Minor Adverse impact. The ES concludes that Section 106 primary healthcare contributions would make this a negligible impact. The applicants planning obligations statement suggest that the matter of provision of healthcare facilities continue to be explored and await the outcome of the financial viability.

387. NHS Norfolk and Waveney Strategic Estates have requested a developer contribution to fund improvements to capacity and mitigate the impacts of the development. However, any additional contributions for the funding of facilities secured through planning obligations will need to take account of development viability; be necessary to make the development acceptable in planning terms; be directly related to the development; and be fairly and reasonably related in scale and kind to the development. Potential contributions to the provision of healthcare would need to be balanced against requirements for other essential infrastructure and community benefits, including provision of affordable housing.

388. NHS Norfolk and Waveney Strategic Estates do however also welcome further discussions regarding the inclusion of land for a health facility sufficient to serve the East Norwich development as a whole. No such discussions have taken place.

389. There is currently no provision within the application for improvements to health care infrastructure in the form of provision of land for a health facility sufficient to serve the East Norwich development as a whole. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01. The application is also contrary to policy DM1 which require provision to be made for improved health and well-being opportunities and NPPF paragraph 97 which requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.

Open space, sport and recreation

390. The ES baseline assessment identifies that there are 3 indoor sports facilities within 1 mile of the site at Riverside Leisure Centre (25 metre swimming pool; gym, fitness classes, sauna and steam room); Wensum Sports Centre (sports hall, gym and studios – facing closure) and at the Hewett Academy (pool, gym, dance studio).

391. There are outdoor sports facilities in locations up to 1.3 miles from the site covering a variety of sports including; Carrow Park (3G football pitch) and Goals Norwich (football and hockey), Lakenham Recreation Ground (Tennis and Bowls), Grace Park (cricket and 5-a-side football), Norfolk Snowsports Club (facilities for skiing, snowboarding and tubing).

392. There are several play spaces and larger outdoor green spaces at Sunny Hill open space, Argyle Street Children's Playground, Grace Park, Netherwood Green Childrens Playground, Jubilee Park (play areas, basket ball courts and football pitches), Hollis Lane and Trowse Woods. Whitlingham Country Park is also within 1.5 miles and offers space for walking, running and water based activities.

393. Three new public spaces are proposed as part of the full and outline parts of the application at Colman's Wharf and surrounding the retained mustard seed building (public squares) and chimney park (small park with water feature), together with use of parts of the Abbey grounds as public open space (including play) and other areas of green infrastructure. The application also references, wetland planting, rain gardens and swales and community gardens, although much of this is contained in the outline part of the application.

394. While there may be sufficient gym, sports and formal recreation services within the local area, the provision of open space and facilities for sport and recreation are also an integral part of green infrastructure and open space required for general informal recreation, discussed in more detail as main issue 10.

Community facilities

395. The ES baseline and Health Impact Assessment (HIA) identifies that the estimated increase in population will give rise to some additional demand for existing community facilities such as libraries, places of worship and community halls.

396. The nearest existing community facilities are Jubilee Community Centre (800m) and Old Lakenham Community Centre (1.1 miles). There are no

existing youth facilities within 5 miles of the site. Allotments are located at Lakenham and Lakenham Baths, but there is no availability and as with all allotments in Norwich there is a waiting list.

397. There are facilities for local community use within relative close proximity to the site. However, on examination it is observed that many of these facilities are in Lakenham or are located towards the city centre or on the opposite side of the river, where access using active travel measures currently requires travelling along or crossing very busy sections of road.

398. The HIA suggest that the proposed development could bring an additional

- 1,291 library service users,
- Youth centres would need to accommodate approximately 222 new participants,
- An additional 134 residents are likely to need access to adult learning and skills services,
- Additional community centre space may be required as part of the overall masterplan.

399. The ES proposes to mitigate the impacts of the proposed development through provision of Section 106 contributions towards social infrastructure with a particular focus on community learning and skills, enhancing libraries provision and youth services. Some of these requirements would be funded through CIL. Additional community space could come forward if demand emerges within existing and proposed buildings as part of the flexible uses proposed, although such requirements and provisions would likely come at a reserved matters stage.

Main Issue 9. Amenity

400. Key policies and NPPF sections – GNLP2, GNLP7.1, GNLPSTR.01, DM2, DM3, DM11, DM12, DM13, NPPF paragraph 135 and section 15.

401. Policy DM2 relates to a number of amenity considerations encompassing the impact of development proposals on those living or working adjacent to development sites as well as the level of amenity new occupiers will experience.

402. The proposed height, massing and density of the development raises a number of amenity considerations relating to overshadowing and internal light levels associated with:

(a) Extent of overshadowing resulting from the development and the impact on the living and working conditions of existing neighbouring residential properties.

(b) Future internal light levels and outlook for future occupiers of the residential flats.

(c) Future external sunlight levels to external amenity areas, including private, shared communal and public areas.

Impacts on existing residents

403. On the north side of the River Wensum are a series of residential apartments blocks located on Geoffrey Watling Way. Blocks range between 6 and 10 storeys in height, with many properties having a southerly aspect. The application is accompanied by a Daylight and Sunlight Report which focuses on the illustrative massing of the proposed development (rather than the parameter massing) as a more realistic future development scenario for the largely outline parts of the application, but does provide some commentary also on parameter massing impacts.
404. The reports technical analysis shows that a high percentage of windows and rooms within the existing development to the north of the river would meet or exceed the default BRE Report guidelines. Where deviation from the guidance occurs, it is predominantly to windows and rooms that are set beneath projecting balconies which, by their inherent design, restrict the amount of light that can be received to the room beneath. Consequently, even a small additional obstruction can lead to a large percentage reduction beyond the default guidance whereas the absolute reduction in light is often modest. The applicant's consultants explain that this does not necessarily mean that the effects are unacceptable, and consideration needs to be given to the local context as the retained levels of daylight and sunlight may be commensurate with the amounts of daylight and sunlight received by other neighbouring buildings in the current conditions.
405. What is clear is that further detail is required, focusing on those areas where light levels will be affected and also extending considerations to impacts on user experience of the existing south facing public riverside path. As the outline application is seeking approval for development associated with a set of parameter plans it is the maximum heights as set out in those parameter plans that should be used as the test for assessing light levels against.

Impacts on proposed residents

406. It is extremely difficult with an outline development to gain significant value from the findings of a report which relates to theoretical/illustrative massing for parts of the development where none of the detail is fixed. However, the headline findings of the report highlight as expected that daylight will be more restricted to units within buildings which face into central courtyards and on lower storeys of taller buildings.
407. Approximately one third of the facades of buildings modelled would receive less than the recommended 1.5 hours of sunlight on 21 March. Over 30% to 40% of each façade will struggle to meet the BRE Report guidelines for sunlight amenity. The areas not meeting the guidelines are mostly orientated in a northerly direction and care will be needed at detailed design stage to ensure that access to sunlight is maximised.
408. Winter sunlight would be restricted to some of the podium level courtyards/amenity spaces central to the apartment blocks and open space/landscaping areas between some of buildings towards the northeast, suggesting that further consideration would need to be given to the layout at detailed design stage to ensure that these public and private amenity spaces receive adequate light levels to be of value.
409. The Health Impact Assessment suggests that a layout has been considered taking into account natural light to dwellings and a scheme can be achieved

where none of the dwellings will be single aspect and north facing, and 58% of units will be dual aspect. However, as a large area of the site is being considered in outline a level of detail does not exist to fully determine whether this can be the case and such detailed considerations would need to take place at reserved matters stage but given the scale of the buildings proposed and their orientation it is considered that this may be difficult to achieve.

410. What this does highlight is that at detailed design stage further assessment will be required and layout of the buildings themselves and rooms within the accommodation will need careful consideration to ensure that a sufficient amount of accommodation has access to adequate light levels. There is no consideration within the report of the impact of the development on light levels to the riverside path. Given that it is located to the north of tall buildings, an assessment of light reaching this important piece of public site movement infrastructure as required by policy GNLSTR.01 will be necessary.
411. For an application of this scale with such large areas in outline and no fixed layout, but with significant heights proposed and quite significant changes between height parameter areas, it is extremely difficult to determine with certainty amenity impacts associated with access to light. The detailed internal layout and external appearance of development blocks would be subject to further reserved matters applications and detailed daylight and sunlight analysis would be required at that time to verify internal lighting conditions for individual residential units.
412. However, notwithstanding this, the outline application seeks consent for parameters which include height and land use together with quantum of development and a supporting Design Code which seeks to establish some street and spaces design and built form principles and therefore it is necessary to assess whether the outline parameters and Design Code could allow for a form of development in which future residents will experience satisfactory living conditions.
413. As discussed previously at least some of the content of the Design Code cannot be agreed and changes to the proposed site code could have wider consequential impacts. More detail is required in the code around massing and transitional areas and how areas of differing heights can ensure living and amenity spaces have adequate access to light.
414. The application therefore currently does not provide sufficient information to allow the impact of height and associated impacts on daylight and sunlight on residential amenity of existing and future occupiers of the development to be determined. In the absence of this information, it must be concluded that the application is contrary to Policies DM2, DM3, DM12 and DM13 of the Development Management Policies Local Plan 2014; and paragraph 135(f) of the National Planning Policy Framework (2023).

Noise and vibration

415. Policy DM2 seeks to ensure that future occupiers of developments will have adequate protection from noise and to protect the amenities of existing occupants in the vicinity of the site from unacceptable noise disturbance. While policy GNL2 similarly requires development to avoid risks of unacceptable noise pollution.

416. An assessment of noise has been undertaken in relation to the proposed development and this has informed the Noise and Vibration section (Chapter 9) of the Environmental Statement. The assessment considers the potential impact of noise (both daytime and night-time) from the primary source of road traffic noise and occasional rail movements on the Great Eastern Main Line on residents and what mitigation may be required for recognised UK standards/guidance to be met. On-site vibration levels were qualitatively assessed during the noise survey and no vibration was observed to be perceptible.
417. The report comments that ambient noise levels at the southeast of the site are influenced by the Tarmac Trowse Asphalt Plant located approx. 50 metres from the site boundary, but goes no further on this matter. Policy GNLP7.1 requires development to address local issues including the active railway, the protected minerals railhead and noise. While policy GNLPSTR.01 goes further to state that 'proposals for development must ensure that they will not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility'.
418. The Trowse railhead and asphalt plant is also safeguarded as part of the adopted Norfolk Minerals and Waste Core Strategy (policy CS16). Two separate operations take place on this site. Tarmac operates an asphalt plant which is regulated by environmental permit and controlled by conditions of relevant planning permissions relating to amongst other things noise, operating hours and control of dust. A planning application to renew/modernise the plant was granted by Norfolk County Council in December 2023. The Tarmac plant is understood to operate at varied intensity depending on demand and therefore an understanding of the periods of peak demand to assess the worst case scenario of noise generation at the site based on the most recent planning approval for the site will be required. Separate from this is use of the site as a railhead, which involves the transfer to site of aggregates by train. Railhead operations have deemed consent, with no restriction on operating hours or conditions limiting noise and therefore are able to operate 24 hours a day, depending on rail network capacity.
419. Representations from the councils environmental protection officer, Norfolk County Councils Minerals and Waste section and Tarmac and Network Rail themselves have raised concerns that the noise from the full extent of potential railhead operations has not been considered. Further investigations and assessment of the noise impacts of the railhead operations at the Tarmac and Network Rail sites with regards to their activities is essential to fully understand the operation of the rail head and the potential impact the noise will have on the proposed development. Explanation should be provided as to how any existing noise impacts on users and residents of the proposed development will be mitigated through the design, layout and construction of the development. In addition a BS4142 assessment is required to ascertain noise levels that affect the outdoor amenity of the proposed development
420. The report also does not make reference to the Acoustics Ventilation Overheating: Residential Design Guide in relation to the mitigation measures to provide noise attenuation. In addition a level 2 AVO assessment is required with recommendations on the attenuation to protect the residents.
421. The noise and vibration impact from demolition and construction on existing residents as part of the applicant's demolition and construction plans has been

considered and can be mitigated through implementation of best practice means of control which can be secured by planning conditions. In addition the noise impacts of changes in road traffic noise as a result of the development, using traffic flow data from the Transport Assessment have been assessed. The change in road traffic noise levels have been calculated to result in negligible short and long term impacts on residents adjacent to the road network.

422. The application as submitted however has not appropriately considered the potential for noise from the existing Trowse mineral railhead to impact on the amenity of residents of the proposed development. Excessive noise impacts could result in complaints that prejudice the continued operation of the safeguarded rail head.

423. Therefore, the application does not provide sufficient information to fully assess the impact of noise on residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; criterion (f) of paragraph 135 and paragraph 191 and 216(e) of the National Planning Policy Framework (2023).

Air Quality

424. Policy DM2 seeks to ensure that future occupiers of developments will have adequate protection from pollution and to protect the amenities of existing occupants in the vicinity of the site from unacceptable air pollution. While policy GNLP2 requires development to avoid risks of unacceptable air pollution.

425. The proposed development site lies just outside of the Air Quality Management Area (AQMA) for NO₂ declared by Norwich City Council in 2012. Policy DM11 requires development which is likely to have an impact on air quality to take particular account of the air quality action plan for that area.

426. This application proposes a significant quantum of development adjacent the AQMA and for this reason, air quality as a potential significant environmental impact is a matter considered within the ES (Chapter 8). The air quality chapter in the ES is informed by an Air Quality Assessment which assesses both construction and operational effects associated with the development.

427. The council's environmental protection officer has commented that due to the scale of the development there is the potential for significant adverse effects to arise from the development in regard to air quality. At present there are concerns regarding various element of the air quality report and therefore it is currently concluded that there is insufficient information to allow a decision to be made regarding the air quality impacts associated with the development. The scope of the report needs expanding to consider a wider range of pollution sources, cumulative impacts, updated published guidance, amended targets and further odour assessments in relation to the Trowse Asphalt Plant.

428. Therefore, the application does not provide sufficient information to fully assess the air quality impacts on the residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; paragraph 192 of the National Planning Policy Framework (2023).

Main Issue 10. Green infrastructure, open space and landscaping

429. Key policies and NPPF sections – GNLP1, GNLP2, GNLP3, GNLPSTR.01, DM3, DM6, DM7, DM8, NPPF section 8, 12 and 15.

430. Green infrastructure (GI), amenity space, open space and landscaping are very much interrelated and subject to a number of adopted development plan policies. Green infrastructure includes a network of multi-functional greenspace which delivers benefits to both the environment and the local community. Green infrastructure can include natural green spaces and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space. These spaces may include allotments, urban parks and designed historic landscapes as well as their many interconnections such as footpaths, cycleways, green corridors, and waterways.

431. Policy DM6 requires development to take all reasonable opportunities to avoid harm to and protect and enhance the natural environment of Norwich and its setting, recognising the need to avoid harm to the adjoining Broads Authority area. Policy DM3 identifies Trowse Swing Bridge as a main gateway to the city which requires a design which respects the location and context of the gateway. Therefore, the site acts as a gateway into the city but also represents a linkage to the countryside and the Broads.

432. Recognising the contribution that GI and site landscaping in general can make to achieving sustainable communities, policy GNLP2 requires development to create and contribute to multi-functional green infrastructure links on or off-site through landscaping, street trees and other tree planting. Policy GNLP3 requires enhancement of the natural environment, requiring development to respect the importance of the nationally designated Broads Authority area and its setting.

433. The site has a significant river frontage to the River Wensum which connects and runs through the adjacent Broads Authority area. Therefore, although it is appreciated that this is a key regeneration site for the city there still needs to be recognition of the relationship of the site with the Broads Authority area in close proximity and the need for provision of green infrastructure and landscaping connections through and from the site into the rural areas beyond the site.

434. Policies DM3 and DM8 both require development to include open space (including landscaping and green infrastructure) for the purposes of improving the appearance and character of the development and the surroundings;

enhancing biodiversity and ensuring new residents have access to local recreational and play opportunities. The NPPF states that planning decisions should plan positively for the provision of shared and open spaces acknowledging the importance of such spaces to the health and wellbeing of communities.

435. Policy DM8 requires informal, publicly accessible recreational open space on-site including for this scale of development, on-site provision of younger children's play space which is at least 150 sq. metres in size with a minimum of four different pieces of equipment. The play spaces would need to adhere to guidelines as set out in the council's Open Space and Play SPD (adopted October 2015) and to the recommendations of Sport England and Fields In Trust.
436. The planning application documents include a set of detailed landscaping plans just for the areas immediately adjacent to the main access routes, public realm and the Abbey grounds which are part of the full planning application. A public open space parameter plan and Design Code form part of the outline submission. The Design Code sets out the wider site spatial hierarchy of spaces and streets setting out what it considers are key landscape spaces including parks and squares and linkages between: creation of public spaces (including squares, new connections and existing street frontages); provision of children's play opportunities; and community growing spaces. The result is, detail in isolation supplemented by a much higher level open space plan and landscaping strategy, providing a patchy, incomplete picture of important linkages and aspects of key public realm such as the riverside path and other green and blue linkages.
437. Policy GNLPSTR.01 requires development across the ENSRA to achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and the locally registered historic park and garden at Carrow Abbey, along with appropriate improved public access.
438. The overall landscape strategy itself lacks a coherent design approach which protects existing features and works them into a usable public landscape framework including a strong access strategy. The site contains significant natural assets including the Abbey grounds and its interesting specimen trees together with areas of woodland, but seeks to deal with the use and functioning of these areas solely via the Design Code rather than utilising a site wide landscape strategy. As discussed in previous sections there are inconsistencies between the Design Code and content of the parameters plans in places, especially around access and movement and this impacts on use of public and private space and connections between.
439. In total the submission states that 4.7 hectares of open space is proposed across the development. Of this total, there will be 0.8 hectares of parks and gardens, 2.62 hectares natural and semi-natural greenspace, 1.15 hectares of amenity greenspace, 0.05 hectares of provision for children and young people and 0.13 hectares of green corridor.
440. Play provision is proposed to take the form of a single equipped area for play (LEAP), several smaller local areas for play (LAP's) and a variety of informal play spaces to be located within the various character areas on site. The informal play spaces are intended to be located within amenity green space to offer doorstep play experiences.

441. The Abbey and its immediate grounds area of open space is central to the development and the most significant area of green space on the site. The strategy for this space is however unclear, the approach seems to be that this is a special area which would remain largely in isolation. However, the development would introduce a significant population of new residents to the surrounding area who would want to access this space as their nearest amenity. In the interests of accessibility and permeability, public access to this area of green space is essential, however it is located at an elevated level compared to much of the proposed new housing. There is no real understanding of how heritage issues associated with protection of the ancient monument while allowing public access or working with the level differences between the garden plateau and the rest of the site will be approached.
442. As discussed earlier under main issue 4, there is an identified deficiency in the amount of green infrastructure provision on site and as a result there is therefore likely to be a lack of the range of functions required to meet the recreational needs of the proposed residents (including dog walking).
443. Taken together the application does not provide sufficient levels of information to fully assess the green infrastructure, open space and landscaping provisions of the development. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM3, DM6, DM7 and DM8 of the Development Management Policies Local Plan 2014; and paragraph 88, 97, 102 and 135 of the National Planning Policy Framework (2023).

Main Issue 11. Trees

444. Key policies and NPPF paragraphs – GNLP 2, GNLP3, GNLPSTR.01, DM7, NPPF paragraph 136.
445. Policy DM7 requires trees and significant hedge and shrub masses to be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or there are exceptional and overriding benefits in accepting their loss.
446. Policy GNLP 2, GNLP3 and STR.01 recognise the contribution that trees make to creating multi-functional green infrastructure, with enhanced natural assets and the protection and enhancement of trees forming an integral part of development design. The NPPF at paragraph 136 goes a step further to acknowledge the contribution that trees can make to helping urban environments mitigate and adapt to climate change.
447. In addition to the protection afforded to many of the trees on the site by the conservation area designation a number individual and groups of trees in the area around the Abbey and its grounds are subject to a tree preservation order.
448. The proposals include the removal of 1 Category B tree group, 7 Category C trees, 1 Category C tree group and 2 Category U trees.
449. The table below sets this out in more detail;

Category	Quantity	Tree Ref. and Reason for Removal
A	0	N/A
B	1 tree group	G63. Direct conflict with proposed new building and road section.
C	7 individual trees and 1 group	T33 and T66. Direct conflict with proposed new woodland footpath sections. T57, T58 and T59. Direct conflict with proposed pavement. T60. Direct conflict with proposed new road section. G61. Direct conflict with proposed new building and road section. T62. Substantial partial conflict with proposed building.
U	2	T2 and T13 both proposed to be removed given their poor and deteriorating condition, along with the intention to run new footpaths close to them.
Total	9 individual trees and 2 tree groups	

450. The council's arboricultural officer objects to the removal of tree groups G61 and G63 and tree T60 (more appropriately categorised category B). The trees are located to the southeast of the Abbey in the area adjacent to the flint boundary wall that separates the formal gardens from the current car parking area. The applicant's own tree report identifies group G61 and G63 as a 'well structured mixed species woodland group' forming an important visual site demarcation, screening and landscape feature'. Due to these being visually significant groups of trees which also provide a valuable woodland habitat on site, together with a single tree worthy of retention in this prominent location on the southern approach to the Abbey, their loss has not been justified, particularly as their loss does not allow for a substantially improved overall approach to the design and landscaping of the proposed development that would outweigh the loss of the trees.

451. The application proposes the loss of visually significant protected trees that has not been justified as it would not result in a substantially improved overall approach to the design and landscaping of the development. The development is contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM7 of the Development Management Policies Local Plan 2014; and paragraph 136 of the National Planning Policy Framework (2023).

Main Issue 12. Biodiversity

452. Key policies and NPPF sections – GNLP3, GNLP7.1, GNLPSTR.01, DM3, DM6, NPPF section 15.

453. Policy DM3 and DM6 requires provision within developments of new and enhanced green infrastructure which create a biodiversity rich environment and encourages the delivery of significant benefits or enhancements to local biodiversity.

454. Policy GNLP3 requires development to deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to local green

infrastructure strategies. It goes further than adopted development plan policy to require demonstration that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation.

455. The governments Planning Practice Guidance (Paragraph: 020 Reference ID: 74-020-20240214) has clarified however that 'decision makers should not give weight to local policy which requires biodiversity gains for types of development which would now be exempt under the statutory framework'. As a submission made before 12 February 2024 when statutory biodiversity net gain for major developments came into force, 10% statutory net gain does not apply. Therefore, the test remains of the lesser NPPF paragraph 180(d) requirement of 'providing net gains for biodiversity' should be applied.
456. Policy GNLP7.1 and GNLPSTR.01 requires development of the ENSRA and Carrow Works site to protect and enhance biodiversity.
457. A Preliminary Ecological Appraisal (PEA) has been submitted by the applicant in support of the application. High level findings include;
- Confirmed bat roost in the abbey and previously confirmed roost in the Stables;
 - High potential for roosting bats in two buildings;
 - Moderate potential for roosting bats in three buildings;
 - Low potential for roosting bats in four buildings and two structures;
 - Hibernation potential in the basements/ground floor of five buildings on site;
 - Potential for bat roosts within trees on the site;
 - Moderate to high potential for commuting and foraging bats associated with woodland on site and off site the River Wensum (north) and railway line (east);
 - Moderate potential for Schedule 1 birds in particular peregrine falcon associated with taller buildings on site;
 - High potential for nesting birds in tree and woodland on site;
 - Moderate potential for reptiles on site;
 - Moderate potential for polecat on site (with previous record);
 - High potential for hedgehog on site.
458. The findings and recommendations of the report include the need for further surveys including:
- Bat activity surveys to inform an approach to mitigation.
 - Bat hibernation and emergence/re-entry surveys.
 - Bat preliminary roost assessments of trees potentially affected by proposals.

- Reptile survey to confirm presence/absence and identify approach to mitigation.
 - Water Vole and Otter surveys may be needed to identify mitigation and compensation for indirect impacts.
 - Surveys for Peregrine falcons and Black redstart/other schedule species.
 - Survey to establish presence/absence of Polecats.
 - Also a significant number of existing buildings are proposed for demolition. Bat surveys and assessment of suitability for bats will be needed for all of these structures.
459. These outstanding protected species surveys need to be undertaken to inform more detailed ecological assessment and the results submitted to enable assessment of the biodiversity impacts and any proposed mitigation prior to the applications determination. No further survey information has been made available since the initial submission of the application.
460. The PEA lists biodiversity enhancement measures to be 'considered' to provide net gains in biodiversity that paragraph 180(d) of the NPPF requires. It suggests that an aspirational minimum of 10% net gain in biodiversity should be evidenced through a Biodiversity Impact Assessment using the then Natural England Biodiversity metric (now Statutory Biodiversity metric). The application was made at a time when statutory biodiversity net gain was not in place and therefore it is not a specific requirement that the DEFRA statutory metric tool is used or 10% net gain demonstrated through the provisions of the Environment Act 2021. However, the NPPF requirement to provide 'net gains' (unquantified) is applicable.
461. The PEA itself concludes 'In the absence of species-specific survey data and a final nutrient neutrality mitigation strategy, some assumptions have been made, however assessments of importance and impacts can be reasonably predicted through assessment of on-site habitats and existing biological records data. However final valuations and impact predictions cannot be made until the surveys are complete, at which point this report should be revised, updated and amended where necessary, to ensure that neutral or positive residual effects remain'. The assumptions made by the applicant's consultants are of a high number and there is evidence of significant omissions in survey information such that it is not possible to fully assess biodiversity impacts on species or habitats or determine any mitigation required to achieve a net gain in biodiversity.
462. The application does not provide sufficient information to fully assess the biodiversity impacts of the development and determine whether significant harm will result from the development taking place. It is not possible to determine whether mitigation measures are required to protect and secure an enhancement of biodiversity such that a net gain in biodiversity is achieved. In the absence of this information, it must be concluded that the application is contrary to policies GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policies DM3 and DM6 of the Development Management Policies Local Plan 2014; and paragraph 180(d), 185 and 186 of the National Planning Policy Framework (2023).

Main Issue 13. Flood risk

463. Key policies and NPPF sections – GNLP2, GNLP7.1, GNLPSTR.01, DM3, DM5, NPPF section 14.
464. The NPPF and Local Plan policy DM5 seek to direct new residential development to sites at the lowest risk of flooding. In accordance with policy the scheme should be assessed and determined having regard to the need to manage and mitigate against flood risk. Policy DM3 and DM5 also requires the incorporation of mitigation measures through the promotion of sustainable drainage to deal with surface water arising from development proposals to minimise and where possible reduce the risk of flooding on the site and minimise risk within the surrounding area.
465. Policy GNLP2 and GNLP7.1 require local flood risk issues to be addressed, together with the incorporation of sustainable drainage systems and flood risk should not be increased elsewhere. Similarly, it is a requirement of the NPPF that development does not increase flood risk elsewhere and also that major developments incorporate sustainable drainage systems.
466. The Environment Agency (EA) flood mapping shows that the majority of the site is not at risk of fluvial and tidal flooding (Flood Zone 1). However, an area in the northeastern corner of the site is located within flood zones 2 and 3 at medium and high flood risk. The site also has a medium risk of surface water flood risk, with areas between buildings at the north of the site and in the northeast corner of the site at most risk. There is also potential for groundwater flooding to occur at the site, again the north of the site in the area along the river is most impacted.
467. A site-specific flood risk assessment (FRA) has been provided in support of the application. The applicant's consultants have amended the EA 2017 modelling and carried out further flood modelling with revised flood levels and flood outlines, but have not submitted the detailed modelling for review by the EA. The EA also advise that the Sequential Approach to the location of development on the site has not been followed and it has not been confirmed whether land raising and development is proposed within Flood Zone 3b (the functional floodplain, where water has to flow or be stored in times of flood).
468. The FRA fails to show that the proposed development will not result in a net loss in floodplain storage. As a result, the proposed development would reduce flood storage capacity, thereby increasing the risk of flooding elsewhere. The submitted FRA has failed to demonstrate that adequate flood storage compensation can be provided on site as it has proposed providing compensatory flood storage within an adjacent site which is subject to a separate planning application and not within the applicant's control.
469. The applicants survey information demonstrates that the northern area of the site discharges surface water to the River Wensum (via 3 outfalls), whereas the southern area (including the Abbey) discharges to the ground via infiltration soakaways. The existing drainage arrangements are proposed to be retained in situ and re-used as part of the proposed development, however no condition surveys have been carried out to confirm their viability nor assessment of infiltration rates has taken place.
470. There is also a lack of consideration of the attenuation capacity that the current surface pooling of runoff provides or the connectivity of the site to the

Deal Ground to the east via surface water and river flooding passing through the underpass beneath the railway and between the two sites.

471. As a site allocation within a new Local Plan, the 'sequential test' to allocation of development has already been carried out and passed through the sites selection for inclusion within the plan. Many of the numerous issues and concerns raised by both the Environment Agency and the Lead Local Flood Authority may be possible to resolve with engagement of the applicant and their project team to provide the outstanding information and clarity required. The requirements of policy STR.01 to incorporate appropriate mitigation measures to address flood risk from both river and surface water flooding have however not currently been met.
472. To date engagement by the applicant has been absent and therefore there remains insufficient information contained within the initial submission to demonstrate satisfactory management of flood risk from all sources and to ensure that the sustainable drainage systems proposed will operate as designed for the lifetime of the development to prevent flooding in accordance with National Planning Policy Framework (2023) paragraph 173 and 175, policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan and policy DM3 and DM5 of the Development Management Policies Local Plan 2014.

Main Issue 14. Development viability

473. Key policies and NPPF sections – GNLP5, GNLP7.1, STR.01, DM33, NPPF section 5.
474. As set out early within this report GNLP policy GNLPSTR.01, sets out ENSRA site wide, followed by Carrow Works site specific requirements and includes a list of key social, economic and other infrastructure requirements that would be expected to be delivered, which may need to be subject to viability testing through individual planning applications.
475. On the specific matter of affordable housing provision, the NPPF emphasis is for local plans to identify the amount of affordable homes required locally. Policy GNLP5 requires major residential development proposals to provide at least 33% affordable housing (this site is not located in Norwich City Centre), or for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision stage. NPPF paragraph 66 suggests that decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.
476. Policy GNLP5 allows for the viable level of affordable housing to be determined at planning application stage having regard to specific site circumstances and evidence of exceptional costs.
477. This is a brownfield site and the applicant has submitted a Financial Viability Report. The applicant's Financial Viability Report has not been subject to an independent review at this stage. It was acknowledged by the applicant themselves, and has since proven to be the case through initial assessment of the submission, that changes to the development proposals from that initially submitted will be required. The local planning authority is of the opinion that those required changes are likely to be substantial, however the applicant has not engaged in discussions and the full extent of any changes have not been

determined. Therefore, until the proposals have been through a process of negotiation and revision and to prevent unnecessary expense, the comments on viability have initially been provided by officers of the council.

478. A headline summary of the appraisal is as follows;

- Benchmark Land Value = £34.68 million (existing use value plus premium).
- Gross Development Value = £552,351,160 (both residential and commercial elements).
- Gross Development Costs = £463,156,996
- Residual Land Value = negative £31.49 million
- Overall viability gap of £66.17 million
- Developer profit = £106,484,937 (12.6%)

479. The viability report makes some allowance for CIL, GIRAMS and nutrient neutrality (wrongly referred to as 'Nitrogen Neutrality'), but does not constitute an offer to pay these amounts and does not consider how vacant building credit could potentially reduce affordable housing requirements at the site.

480. The report makes no provisions for additional key infrastructure costs associated with the requirements set out in policy GNLSTR.01 such as bridge or underpass links or allowances associated with provision of land for a school or health facility. The conclusion of the report is that due to the residual site value after allowing gross development costs being less than the benchmark land value the development cannot support any additional contributions. The viability appraisal also makes no provision for an affordable housing contribution of any type i.e, neither on site nor in the form of a commuted sum, as to do so according to the information provided by the applicant would not be viable.

481. The applicant's viability appraisal is very high level and although the council's own high level assessment of this information has raised some initial queries, it has not been possible to pursue this further due to the lack of engagement of the applicant.

482. Of note is that after adding in the benchmark land value the development would appear to deliver a profit well below industry standard levels which could raise financing issues and would therefore raise concern around actual deliverability of the scheme.

483. There would clearly be a need to more thoroughly test the viability information through independent review at some point, including an independent review of the sites existing use value which appears high. However, at this initial stage it is also highly likely that public funding/subsidy will be necessary to deliver development on this site which meets the requirements of the GNLSTR policies: no discussions on this have taken place to date.

484. It was envisaged several years ago that development at East Norwich represents a transformative opportunity for regeneration of the area and the

East Norwich Partnership sought to bring forward comprehensive and coordinated regeneration of the East Norwich area.

485. The development proposed at Carrow Works as part of this planning application however represents a single isolated development which lacks the facilities and necessary connectivity to deliver sustainable accessibility. It has not been comprehensively undertaken so as to connect and contribute in a wider sense, along with other sites, to the delivery of sustainable development at East Norwich. Delivery in isolation without facilitating the connectivity within and between sites in the strategic regeneration area or providing co-ordinated delivery of new social and economic infrastructure could be prejudicial to future development of or restrict options for other sites that form part of the ENSRA.

486. As it stands the application is not acceptable for a number of policy reasons aside from the obvious ones relating to lack of provision of key infrastructure required to deliver a highly sustainable development required to contribute towards the high quality sustainable residential led mixed use community of East Norwich.

Other matters

Contamination

487. Key policies and NPPF section – GNLP2, GNLP7.1, GNLPSTR.01, DM11, NPPF section 5.

488. A Phase I Desk Study and Phase 2 Site Investigation Report have been submitted to support the application. The outcomes of these reports are that a full investigation was not possible whilst there were structures on the site and there were areas that could not be accessed. Following the additional investigations, remediation strategies to mitigate risks to the proposed development from identified contamination may need to be prepared.

489. As there is not a full account of the contamination on site the environmental protection officer has asked that a full contaminated land condition be used to ensure that the pollutants and contamination pathways have been fully considered to enable the site to effectively be remediated

490. The Environment Agency also suggest that conditions could be used to secure further outstanding detail. Together this requires conditions relating to contamination investigation/suitable remediation and verification; controls over infiltration SUDs; piling; controls over soil importation and a reminder that an asbestos survey should inform building refurbishments.

Energy and water efficiency

491. Key policies and NPPF paragraphs – GNLP2, DM1, NPPF section 14.

492. The proposal triggers both energy and water elements of policy GNLP2. An Energy and a Construction Statement accompanies the application and proposes separate strategies for the refurbished buildings which form part of the detailed application and for the refurbished and new build dwellings and commercial units included in the outline.

493. A combination of use of a fabric first approach utilising passive design measures, well insulated and airtight building fabric (Future Homes Standard as a minimum) and a site wide approach utilising measures such as PV, solar thermal and heat pumps will be used.

494. Measures are also highlighted that would limit water consumption on a domestic and commercial scale. Suitably worded conditions could be used to secure the specified energy requirements and water efficiency measures as required by GNLP2.

Equalities and diversity issues

495. Part of the submission include reference to features of the development which could be considered to promote equality and diversity. In summary these include:

- 20% of new homes to comply to meet 2015 Building Regulations M4(2) for accessible and adaptable dwellings.
- Improved access to new employment opportunities.
- Parking provision to include provision for disabled drivers in accordance with policy standards.

S106 Obligations

496. GIRAMS contribution of £391,952 (£210.84 per residential unit) is identified in the Financial Viability Report.

497. Nutrient neutrality – indicative costs between £2,500 and £5,500 per dwelling.

Local finance considerations

498. Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are defined as a government grant or the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority.

499. The scheme proposed represents investment in the City which will take place over a prolonged period. As such it could have considerable financial benefits in terms of direct and indirect employment during the construction period and a likely further increase in employment levels in the commercial space created and that arising from the spend of future residents. These impacts were considered in main issue 8 of the report and are clearly material considerations in reaching a planning decision.

500. However, the scheme will give rise to other local finance considerations such as:

- a) A considerable increase in Council Tax revenues compared to the current situation. This would only be material to the planning decision if it were considered to help make the development acceptable in planning terms. Whilst the income raised may be significant the development will also create commensurate demands on Council services and in the absence of any evidence that any increase in Council Tax revenues will be directed into the area this impact is not considered material to the planning decision.
- b) A changed level of business rates income which could represent an increase on the current situation when the development is complete. In the absence of any evidence that any increase in business rates will be directed into the area this impact is not considered material to the planning decision.
- c) New Homes Bonus. At present the future of New Homes Bonus is uncertain so it is not known whether development of Carrow Works would result in financial benefit to the Council. In this situation this is not considered material to the planning decision.
- d) Community Infrastructure Levy. The development may give rise to Community Infrastructure Levy. The rates that it may give rise to are uncertain given that Levy rates may change over the duration of the scheme but at current rates the potential CIL liability of the proposed scheme is estimated at £7.78m (as calculated by the applicant). If generated 5% of this would be taken to cover administrative costs, 15% would go into the neighbourhood fund and be used at the City Council's discretion and the remaining 80% would be pooled into the Infrastructure Investment Fund which is reallocated by the Greater Norwich Growth Board to infrastructure projects based on their strategic need.

Human Rights Act 1998

501. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to refuse this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

502. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to refuse planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

503. A substantial number of statutory consultees have raised objections to the proposed development on a wide range of matters from impact on designated sites, heritage impacts, impact on highway safety and network resilience, lack of provision of necessary infrastructure, lack of housing that meets local needs including affordable housing, lack of green infrastructure, unjustified loss of

trees, flood risk, ecological impacts and impact on residential amenity. However, even in light of the critical comments received, the applicant has not made any changes to the submission or engaged to discuss technical matters.

504. It has been reported in paragraph 256 that this development required an appropriate assessment under the Habitats Regulations. In these circumstances the NPPF states in paragraph 188 that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a habitats site (either alone or in combination). In this case the appropriate assessment did not conclude that the proposal would have no adverse effect on the integrity of habitats sites.
505. As the presumption in favour of sustainable development does not apply, all policies in the current development plan should be considered to remain up to date for the purposes of paragraph 11 of the NPPF. In this context Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise, and this remains the starting point for the decision on this application. This includes the newly adopted Greater Norwich Local Plan.
506. The Carrow Works site presents a unique opportunity in the city to create a vibrant and truly distinctive new quarter for Norwich, built around, responding to and enhancing its rich collection of highly significant heritage assets centred around Carrow Abbey and Priory ruins. The sites size and the scale of development proposed would represent one of the largest development schemes proposed in the city and the development proposed here could bring back into use a largely vacant site, making a much more efficient use of the site than is currently the case and opening up large parts of the site to access by new residents together with the general public. The opportunity that redevelopment presents would appear very positive.
507. Regeneration of East Norwich would support Norwich City Council's Norwich 2040 City Vision, with its foundations built on creating a creative, fair, liveable, connected and dynamic city. There also exists a policy framework which is strongly supportive of the principle of mixed use redevelopment of this previously developed 'brownfield' site and includes an area and site specific policy relevant to redevelopment proposals on different parts of the ENSRA.
508. Indeed, the redevelopment proposals would bring economic benefits firstly in the form of employment during construction and longer term through employment opportunities that will be created through an as yet undefined mix and amount of commercial elements of this mixed-use development. The optimistic creation of over 1,000 jobs is clearly a beneficial aspect of the proposals and contributes to meeting the requirements of policy GNLP7.1 and GNLSTR.01 and the employment opportunities around the creation of 4,100 jobs. However, employment provision can only attract moderate weight due to the reservations highlighted.
509. The proposed 1,859 dwellings will make a very substantial contribution to housing supply in the city. This residential-led scheme would directly support the housing delivery objectives of the GNLP and the NPPF in terms of significantly boosting the supply of homes. However, the lack of affordable housing provision and a proposed mix of housing types that is not consistent with identified local housing need would result in an unsustainable housing

development, which significantly reduces the weight that the provision of housing can be afforded to nothing greater than limited weight.

510. Even though the council and Greater Norwich authorities can demonstrate a five-year housing land supply, it is acknowledged that this site makes a significant contribution to housing delivery in future years. However, housing delivery even at significant levels as proposed here needs to be carefully weighed alongside the numerous harmful impacts that would result from the development that is currently proposed at the site and as discussed throughout this report.
511. There is an argument to be made that the proposals will bring the historic buildings on the site, including some of the highest significance, back into an active use, preventing deterioration and harm associated with longer term lack of use and neglect. However, this is not without harm being created itself as a result of the physical works required and the subdivisions created. Also, the wider proposals will introduce some public access to areas of the site that have until now been mainly private. However, again there are a whole range of other potentially less harmful uses which could achieve greater public access to the site and associated benefits that have not been explored. Therefore, any weight that can be afforded to the proposals bringing the site and buildings back into use is extremely limited due to the identified heritage harm.
512. Aside from the housing, the application as proposed fails to deliver much by way of public benefits or many of the other elements that together would contribute to achieving a highly sustainable mixed-use quarter at East Norwich. The development fails to deliver in a substantial number of ways the requirements of the site-specific policy GNLP7.1 and GNLPSTR.01 that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. In addition, many of the deficiencies in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result.
513. The development has failed to demonstrate an acceptable access strategy which provides access to the site by vehicles in a manner which does not impact on the safe and satisfactory functioning of the highway, together with much greater emphasis on provision of sustainable access for all. This requires adequate new or improved on and off-site facilities for pedestrians / cyclists / people with disabilities, to encourage walking and cycling/wheeling, together with improved public transport access, to maximise sustainable transport and to connect with and permeate through the site and link through existing and proposed new infrastructure with adjacent sites and local services.
514. There is no certainty within the submission as to delivery of any off-site infrastructure, including improvements to the existing highway network through modification of road infrastructure and junctions in the Martineau Lane, Bracondale and King Street areas to improve pedestrian and cycle access between the site, wider ENSRA and the city centre, facilities at Riverside Retail Park Large District Centre and Norwich Railway Station. There is also no firm commitment to the provision of bridge connections or railway underpass enhancements to connect the site to surrounding land/developments or other parts of the ENSRA.

515. The poor connectivity and limitations to sustainable accessibility and permeable movement to, from and throughout this development are quite significant failings of the application which will result in a development which is isolated from its neighbours and the rest of the city, limiting access to infrastructure, jobs and services for its new residents.
516. The situation of isolation from services is greatly exacerbated by the lack of provision of necessary social infrastructure on the site itself, including a serviced site to allow the delivery of a two form entry primary school required to meet the requirements of this development alongside other allocated large scale developments and provision of land to secure improvements to healthcare infrastructure sufficient to serve the whole of the ENSRA, as required by GNLP policy.
517. Another significant consideration particular to this site is that of heritage impacts. Although heritage consultees support the principle of regenerating the site, the current submission fails to respect the site's heritage by re-purposing the site's heritage assets and opening the site up to public use in a way which improves their setting and maintains an appreciation of their significance.
518. Paragraph 203 of the NPPF highlights the importance of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. The proposed residential use of Carrow Abbey as three dwellings has not been demonstrated to represent the optimum viable use for the Grade I listed building or the area of scheduled monument (Carrow Priory). As a result, the development in and around the Abbey, including new development in place of the dining hall, has been found to result in high levels of less than substantial harm to the significance and setting of these high order designated heritage assets associated with the necessary changes that are required to accommodate the proposed use, affecting the evidential, historic and communal values of the monument and Abbey, and their strong interconnection.
519. Paragraph 205 of the NPPF requires great weight to be given to a designated heritage asset's conservation, and the more important that asset, the greater the weight should be. Harm to, or loss of, the significance of a designated heritage asset of any level requires clear and convincing justification to satisfy the NPPF paragraph 206.
520. Aside from the development impacting on the immediate setting and significance of designated heritage assets in the historic core of the site, the proposals associated with wider areas of the site have also been found to result in high levels of less than substantial harm to the significance of designated heritage assets. Adaptation of and significant extension to non-designated heritage assets along the riverside in close proximity to designated heritage assets will not contribute positively to the conservation of many of the heritage assets or their setting, including the character and distinctiveness of the conservation area. Similarly, the impact of heights of some of the new build elements within the outline proposals and their specific arrangement in proximity to more sensitive heritage assets have significant potential to result in harm to varying degrees on setting and significance of various designated heritage assets. These levels of cumulative harm would need to together be weighed against the public benefits of the proposal.

521. In terms of heritage impact, officers have had regard to benefits of the scheme summarised in paragraphs 506-511 above, however these benefits need to be considered in the balance against high levels of less than substantial harm to the significance of a number of designated heritage assets that under paragraph 208 of the NPPF should be weighed against the public benefits. In making a planning judgement on this application given the overall identified level of harm to designated heritage assets across the site, great weight should be attached to avoidance of this harm. The NPPF highlights that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
522. Moving on to more general areas where information is absent, or detail is lacking such that it is not possible to fully consider and assess impacts of the development. Information concerning noise and air quality impacts is not sufficient and further detail around elements of height and layout to the extent that they impact on daylight and sunlight are required to assess residential amenity impacts of the development.
523. On a wider site scale, information relating to green infrastructure provisions, including open space provision, landscaping and biodiversity enhancements to provide a net biodiversity gain and information relating to flood risk and site drainage is not sufficient to fully assess whether provisions are adequate or impacts acceptable. Also, the proposed loss of visually significant protected trees has not been justified as it would be detrimental to the character and appearance of the Bracondale conservation area and would not result in a substantially improved overall approach to the design and landscaping of the development.
524. The application site is located in a river catchment where new development has the potential to cause adverse impacts on protected habitats. Measures to address the potential adverse effects of the development on the integrity of the Broads Special Area of Conservation (SAC) caused by increased nitrate and phosphate loading and a consequent degradation in water quality need to be incorporated into the development through the provision of mitigation measures or the purchase of credits. Without such provisions it has not been possible to conclude no adverse effects of the development proposal on the integrity of internationally designated wildlife sites (protected sites) in relation to degradation of water quality caused by increased nitrate and phosphate loading.
525. Measures to address the potential adverse effects of the development on the integrity of protected habitats sites caused by increased recreational pressure through provision of twofold mitigation (payment of the RAMS tariff and provision of Green Infrastructure relevant to the scale of the proposal) is required to be compliant with the Habitats Regulations. Mitigation measures should be secured via a planning obligation and conditions. Without such provisions it has not been possible to conclude no adverse effects of the development proposal on the integrity of internationally designated wildlife sites in relation to recreational disturbance.
526. The application is Schedule 2 development and subject to an Environmental Impact Assessment (EIA), which results in an additional consequence associated with the deficiencies set out within this report. The

conclusions of the HRA state that adverse effects on the integrity of internationally designated wildlife sites cannot be ruled out. Having considered the information contained within the Environmental Statement, other detailed supporting information and responses from consultation bodies, inadequacies associated with the information and the lack of certainty of mitigation identified within the Environmental Statement consequently result in a reasoned conclusion that significant effects of the proposed development on the environment will result when considered under the EIA Regulations.

527. Therefore, in conclusion it is considered that the submitted scheme if built will not have the significant regenerative effect on the East Norwich Strategic Regeneration Area that the policy framework is seeking to deliver. Although the scheme could deliver on a limited number of planning objectives and policies for the site, the level of economic and social benefits which would result from the development are not considered to outweigh the cumulatively significant levels of harm that would arise from the development. Firstly, in relation to the harmful impact on setting and significance of highly significant designated heritage assets for which the optimum viable use has not been demonstrated. Also, the harm resulting from the lack of provision of safe and sustainable accessibility to the site and delivery of identified social infrastructure requirements. In addition, there remain a significant number of topic areas where the information submitted is not sufficient to determine whether provisions are adequate or impacts acceptable. Finally, there are the associated significant effects on the environment and adverse effects on the integrity of internationally designated wildlife sites.

528. Importantly delivery in isolation without facilitating the connectivity between sites in the strategic regeneration area or providing co-ordinated delivery of new social and economic infrastructure could be prejudicial to future development of or restrict options for other sites that form part of the ENSRA. Collaboration with and between other East Norwich partners and land owners will be required to deliver the development that is required at East Norwich including key items of infrastructure.

529. In the opinion of officers, the public benefits identified would not be anywhere close to the levels required to outweigh the cumulative, significant harmful impacts of the development as identified throughout this report. Neither has any clear and convincing justification been demonstrated in order to justify any of the identified heritage harm. It is therefore recommended that planning permission should be refused.

Recommendation

530. To refuse application no. 22/00879/F Carrow Works, King Street for the following reasons:

1. The application fails to deliver many of the requirements of the site-specific policy that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. Many of the deficiencies in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result. The application is therefore contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024.

2. In the absence of any contrary evidence, the housing types proposed and particularly the predominance of flats is not consistent with the Greater Norwich Local Housing Needs Assessment. This along with the total lack of affordable housing results in an unsustainable housing development proposal, whereby the mix of dwellings by type and tenure fail to promote the creation of a mixed, diverse, inclusive and equitable community, contrary to GNLP 5, GNLPSTR.01 of the Greater Norwich Local Plan 2024, and policy DM1, DM12 of the Development Management Policies Local Plan 2014 and the National Planning Policy Framework (2023).
3. In the absence of a detailed economic strategy of proposed non-residential uses and their location across the site and the contributions that these will make to job creation, together with a demonstration of how the retail and leisure and office uses can be achieved without impacting on existing town centre use provision or office accommodation on sites designated for such uses nearby or encouraging car dependency for access, it is not possible to conclude that the non-residential uses proposed would comply with the detail set out within policy GNLP4, GNLP6, GNLPSTR.01 of the Greater Norwich Local Plan 2024 and policy DM1 of the Development Management Policies Local Plan 2014.
4. An Appropriate Assessment has concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in nitrate and/or phosphate levels which would further adversely affect the current unfavourable status of the Broads Special Area of Conservation. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of this habitats site and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM6 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).
5. An Appropriate Assessment has concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in recreational disturbance due to the impact of additional visits to Special Areas of Conservation (SACs and SPAs) in the Wash, Norfolk Coast and the Broads. There is a lack of a mechanism to secure payment of the RAMS (Recreational Access Mitigation Strategy) tariff, together with insufficient new on-site and enhancement of off-site green infrastructure provision both in terms of quantity and function to meet the informal recreational needs of the new residents. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of these habitats sites and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).
6. The lack of certainty of mitigation to prevent adverse affects on the integrity of habitats site could cause significant, permanent negative impacts on the environment of international scale as identified within the Environmental Statement. The application is therefore contrary to policy GNLP3 of the

Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).

7. The individual buildings comprising the application site are distinguished by their significant architectural and historic interests; moreover, the group value of all heritage assets deriving from their links and associations with each other and this unique context, further reinforces their significance. The proposals have been found to result in high levels of harm to the setting and significance of a number of designated and non-designated heritage assets. The high levels of individual and cumulative harm caused is 'less than substantial harm', which is without clear and convincing justification and is not sufficiently outweighed by public benefits, and as such the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM9 of the Development Management Policies Local Plan 2014, paragraphs 201, 203, 205 -208 of the NPPF and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
8. The fundamentals of the application surrounding heritage and access and movement remain to be resolved, it cannot be concluded that the design of the development fully respects or enhances the character and context of the local area or delivers a beautiful and well-designed exemplar of high quality, high density and locally distinctive design which respects its context and setting.

Outstanding issues surrounding heritage impacts will have implications for the interrelated land use, demolition, proposed heights and public open space outline parameters plans. The outstanding access and movement matters will greatly impact on the access and movement outline parameters plan and as site access is demonstrated across all of the parameter plans it impacts on these also. In addition the detailed Design Code is based on key layout principles set out on a Regulatory Plan which takes information from the outline parameters plans which are not considered acceptable.

The application is therefore contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3 of the Development Management Policies Local Plan 2014 and the design principles as set out in section 12 of the National Planning Policy Framework (2023).

9. The access proposed at the A1054 Bracondale / Martineau Lane roundabout is unsatisfactory to serve the proposed development by reason of inappropriate design contrary to current guidance and would be to the detriment of highway safety, contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM30 of the Development Management Policies Local Plan 2014 and, NPPF paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
10. The proposed development includes a new access at A1054 Bracondale, a strategic road that carries significant traffic movements. The vehicular movements associated with the use of the access would lead to conflict and interference with the passage of through vehicles and introduce a further point of possible traffic conflict, being detrimental to highway safety,

contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM30 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).

11. The proposed development does not adequately provide on and off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to encourage walking and cycling/wheeling to connect with and permeate through the site and link with adjacent sites and local services, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
12. The proposal fails to demonstrate that improved public transport access to the site can be achieved, to maximise sustainable transport opportunities which together could lead to reduced car dependency and a corresponding reduced level of car parking provision across the site. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM1, DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
13. The proposal does not provide adequate access for all modes and would be likely to give rise to conditions detrimental to safe sustainable development in transport terms, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
14. The application is not supported by sufficient highways and transport information, including a travel plan and parking strategy to demonstrate that the proposed development will not be prejudicial to the safe and satisfactory functioning of the highway or that the proposed development represents a sustainable form of development, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9, including paragraph 115 of the National Planning Policy Framework (2023).
15. There is no provision within the application for social infrastructure in the form of a serviced site for a two form entry primary school on this strategic development site. The application is therefore contrary to policy GNLP4, and GNLPSTR.01 of the Greater Norwich Local Plan 2024 and paragraph 99 of the NPPF which requires sufficient choice of school places with great weight given to the creation, expansion or altering schools to meet the needs of existing and new communities. The application is also contrary to policy DM1 which requires provision to be made for enhanced and accessible education opportunities.

16. There is currently no provision within the application for improvements to health care infrastructure in the form of provision of land for a health facility sufficient to serve the East Norwich development as a whole. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLSTR.01 of the Greater Norwich Local Plan 2024. The application is also contrary to policy DM1 which requires provision to be made for improved health and well-being opportunities and NPPF paragraph 97 which requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.
17. The application does not provide sufficient information to allow the impact of height and associated impacts on daylight and sunlight on residential amenity of existing and future occupiers of the development or on areas of private and public amenity space including riverside paths to be determined. In the absence of this information, it must be concluded that the application is contrary to policy DM2, DM3, DM12 and DM13 of the Development Management Policies Local Plan 2014; and paragraph 135(f) of the National Planning Policy Framework (2023).
18. The application does not provide sufficient information to fully assess the impact of noise on residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP7.1 and GNLSTR.01 of the Greater Norwich Local Plan; policy DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; criterion (f) of paragraph 135 and paragraph 191 and 216(e) of the National Planning Policy Framework (2023).
19. The application does not provide sufficient information to fully assess the air quality impacts on the residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP7.1 and GNLSTR.01 of the Greater Norwich Local Plan 2024; policy DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011 and paragraph 192 of the National Planning Policy Framework (2023).
20. The application does not provide sufficient information to fully assess the green infrastructure, open space and landscaping provisions of the development. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP3 and GNLSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM6, DM7 and DM8 of the Development Management Policies Local Plan 2014 and paragraph 88, 97, 102 and 135 of the National Planning Policy Framework (2023).

21. The application proposes the loss of visually significant protected trees that has not been justified as it would not result in a substantially improved overall approach to the design and landscaping of the development. The development is contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM7 of the Development Management Policies Local Plan 2014 and paragraph 136 of the National Planning Policy Framework (2023).
22. The application does not provide sufficient information to fully assess the biodiversity impacts of the development and determine whether significant harm will result from the development taking place. It is not possible to determine whether mitigation measures are required to protect and secure an enhancement of biodiversity such that a net gain in biodiversity is achieved. In the absence of this information, it must be concluded that the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR. 01 of the Greater Norwich Local Plan 2024; policy DM3 and DM6 of the Development Management Policies Local Plan 2014; paragraph 180(d), 185 and 186 of the National Planning Policy Framework (2023).
23. The application does not provide sufficient information to demonstrate satisfactory management of flood risk from all sources and to ensure that the sustainable drainage systems proposed will operate as designed for the lifetime of the development to prevent flooding in accordance with paragraph 173 and 175 of the National Planning Policy Framework (2023); policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024 and policy DM3 and DM5 of the Development Management Policies Local Plan 2014.

Article 35(2) Statement

The local planning authority in making its decision has had due regard to paragraph 38 of the National Planning Policy Framework as well as the development plan, national planning policy, Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and the Conservation of Habitats and Species Regulations 2017 and other material considerations. The local planning authority has advised the applicant of the significant issues with the content of the application and deficiencies with some of the supporting information which have resulted in the reasons for refusal outlined above. There has been no further engagement from the applicant on these technical matters.

Appendices: Four

Contact officer: Senior Planner

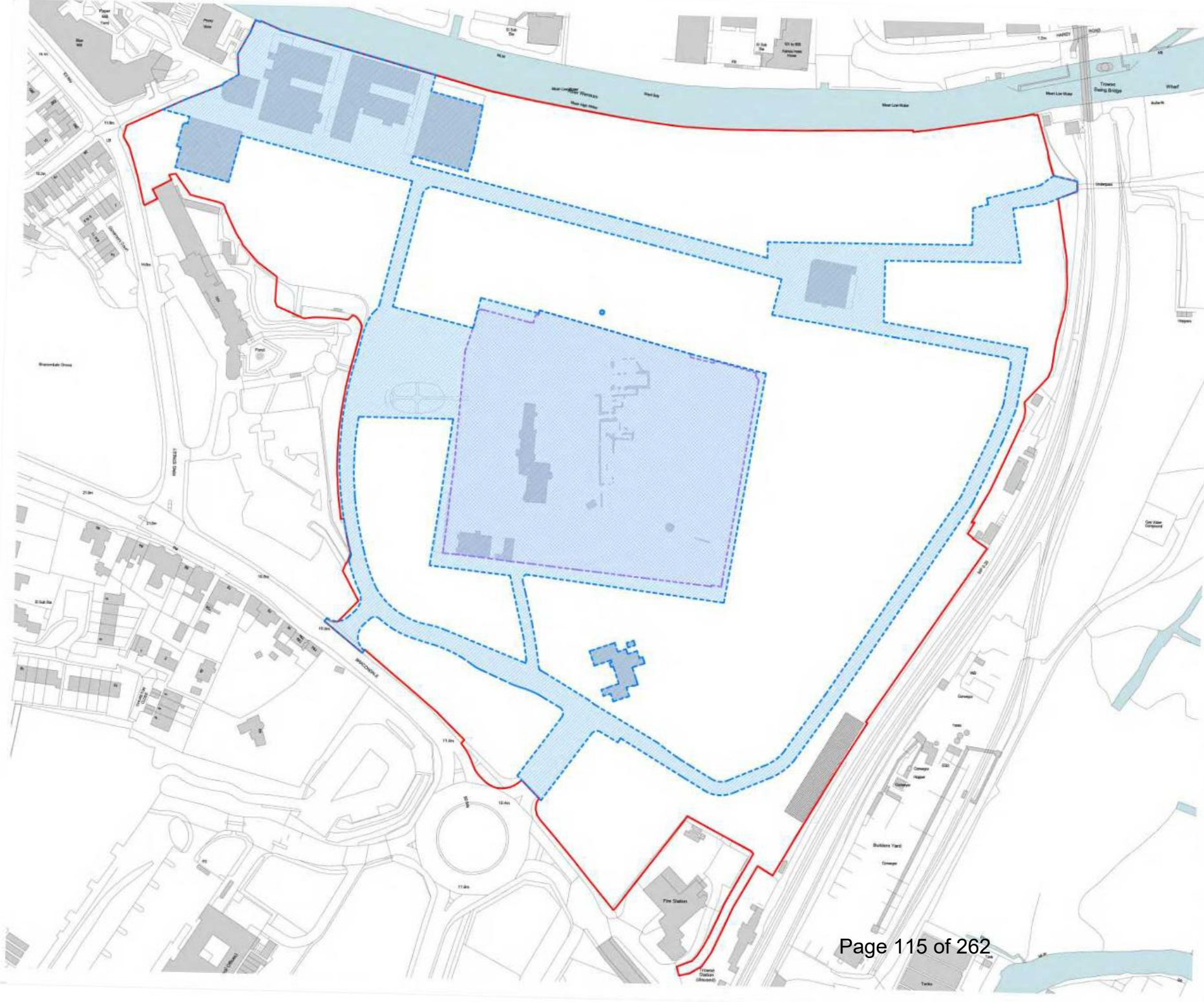
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Notes
 Do not scale from this drawing.
 All contractors must visit the site and be responsible for taking and checking dimensions.
 All construction information should be taken from figured dimensions only.
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.
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Key

- Hybrid Application Boundary
- Detailed Application
- Existing Buildings To Be Retained
- Scheduled Monument

PI	27.06.22	Planning Submission	MM	JP
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				

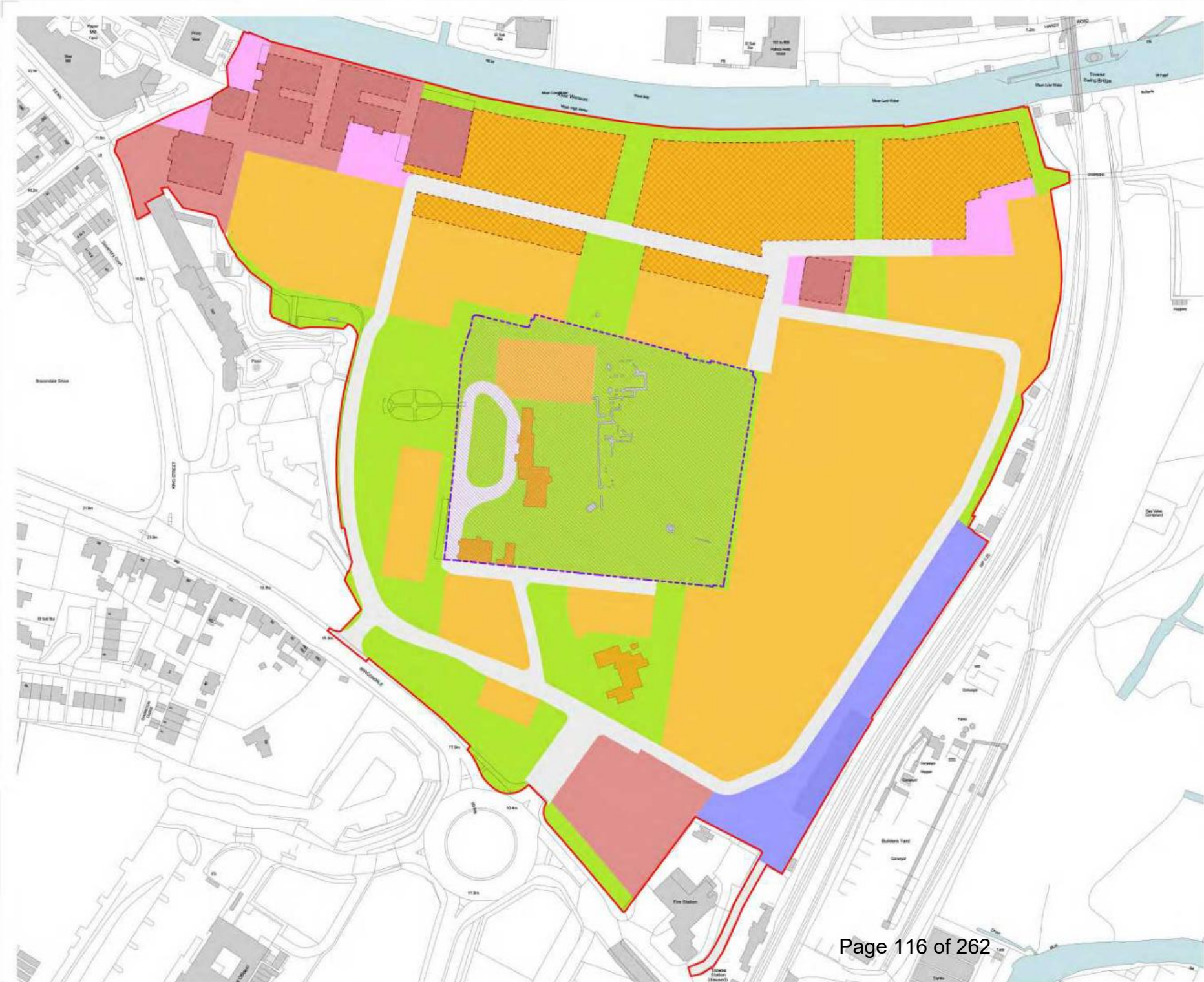


Project
Carrow Works, Norwich

Drawing Title
**Parameter Plan
 Hybrid Application Boundaries**

Scale @A1 1:1000 Job Ref: 03002
 Drawing No: PP-01 Revision: 01
 Scale Bar 0 10 20 30 40 50 m

Sheet Code
 03002-JTP-PP-01 - Hybrid Application Boundaries - P1



Notes

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Key

- Hybrid Application Boundary
- Existing Buildings
- Class C3 (including internal access, parking, incidental play spaces and associated infrastructure)
- Retained Buildings Class C3
- Class C3 with flexible Class E & with flexible Class C3 at Ground Floor Level
- Class E
- Retained Buildings Class E
- Employment (Class B)
- Scheduled Monument
- Landscape and Open Space (Please refer to Drawing No. PP-04 for the details of the landscape and open space)
- Public Realm
- Main Infrastructure

Notes

All land uses can deviate +/- 2m within the application boundary, subject to on-site or heritage constraints.

PI	37.06.22	Planning Submission	RM	PI
Rev	Date	Description	Drawn	Check

Client

JTP Studios, Unit 5,
 The Barn Warehouse
 Parnham Street
 London, E1 2JF 2JF
 +44 (0)20 7517 1710
 www.jtp.co.uk

Project
Carrow Works, Nowrich

Drawing Title
**Parameter Plan
 Land Use Plan**

Scale @A1 1:1000 Job Ref 0202
 Drawing No. PP-02 Revision: P1
 Scale Bar 0 10 20 30 40 50 m

Sheet Code 02022-JTP-PP-02 - Land Use Plan - P1

Notes

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Key

- Hybrid Application Boundary
- Existing Buildings To Be Retained
- Existing Buildings To Be Demolished
- Scheduled Monument

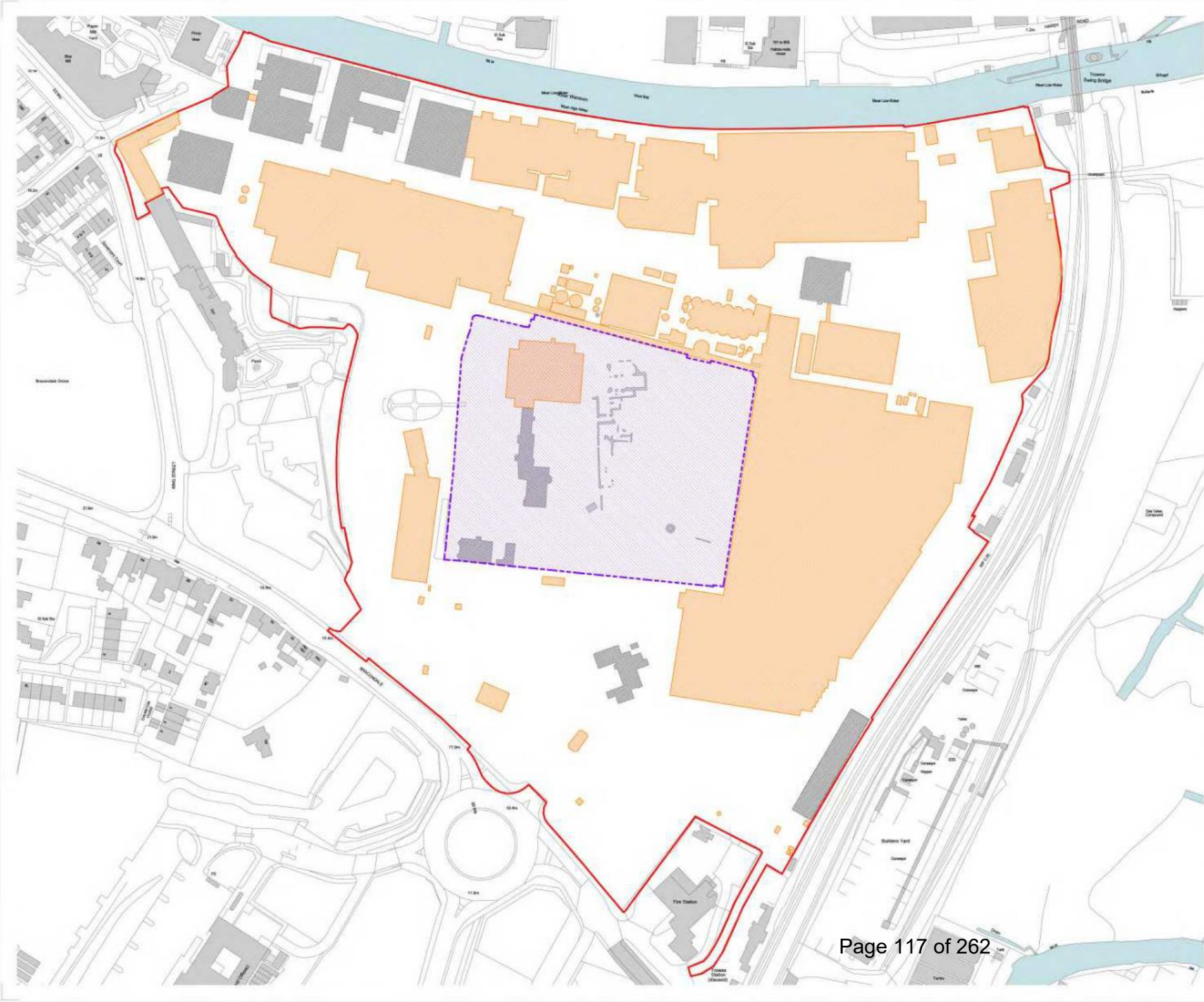
PI	27.06.22	Planning Submission	BM	PI
Rev	Date	Description	Drawn	Check
Drawing Status: For Planning				



Client: **Carrow Works, Norwich**

Drawing Title: **Parameter Plan
 Demolition Plan**

Scale @A1: 1:1000 Job Ref: 02022
 Drawing No: PP-03 Revision: P1
 Scale Bar: 0 10 20 30 40 50 m
 Sheet Code: 02022-JTP-PP-03 - Demolition Plan - P1





Notes

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Key

- Hybrid Application Boundary
- Existing Buildings To Be Retained
- Main Infrastructure
- Scheduled Monument
- Public Open Space (including SuDS and play)
- Private Open Space
- Existing Trees To Be Retained
- Riverside Walk
- Public Realm
- ▲ Indicative Location of Children's Play Space*
- Indicative Location of SuDS Features (including surface attenuation ponds/basins, storage tanks and rain gardens)*
- Indicative Green and Blue Line (alignment and detail to be agreed at RMA stages)

Notes

All land uses can deviate +/- 2m within the application boundary, subject to on-site and heritage constraints.

*Exact location, shape and sizes of SuDS features and play areas are indicative only.

Attenuation will also be provided on-pot for podium buildings.

PI	37.06.22	Planning Submission	RM	JF
Rev	Date	Description	Drawn	Check
Drawing Status				
For Planning				

Client

Fuel Properties

jtp JTP Studios, Unit 5, The Barn Warehouse, Parmenton Street, London, E1 1RZ 2AF, +44 (0) 20 7517 1700, www.jtp.co.uk

Project: Carrow Works, Nowrith

Drawing Title: Parameter Plan
Public Open Space

Scale @A1 1:1000 Job Ref: 02022

Drawing No: PP-04 Revision: P1

Scale Bar: 0 10 20 30 40 50 m

Sheet Code: 02022-JTP-PP-04 - Public Open Space - P1

Notes

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Key

- Application Boundary Line
- 1-2 storeys (12.05m maximum ridge height)
- 1-2 storeys (10.22m maximum ridge height)
- 2-3 storeys (12.05m maximum ridge height)
- 2-4 storeys (19.00m maximum ridge height)
- 3-6 storeys (25.30m maximum ridge height)
- 5-8 storeys (31.00m maximum ridge height)
- 8-11 storeys (41.00m maximum ridge height)
- 11-14 storeys (50.00m maximum ridge height)
- Scheduled Monument

Notes

The extent of the building height parameter envelop can deviate laterally +/-2m within the application boundary, subject to on-site and heritage constraints.

The height parameters set out in the Building Heights Parameter Plan are to maximum ridge heights and include parapet heights and liftroom overruns. The heights are set from existing ground levels, not a proposed Finished Floor Level and therefore account for any ground works that may need to be undertaken. Each of the parameter levels has been set at such a level to allow for flexibility to be introduced in roof line and the steepness of roof pitches in order to create variety and interest.

PI	37.06.22	Planning Submission	RM	#
Rev	Date	Description	Drawn	Check
For Planning				

Client




JTP Studios, Unit 5,
 The Burn Warehouse
 Panningson Street
 London, E16 2AP
 +44 (0)20 7517 1700
 www.jtp.co.uk

Project
Carrow Works, Nowrich

Drawing Title
**Parameter Plan
 Proposed Heights**

Scale @A1 1:1000 Job Ref: 03202
 Drawing No: PP-05 Revision: P1
 Scale Bar 0 10 20 30 40 50 m
 Sheet Code 02022-JTP-PP-05 - Proposed Heights - P1

Notes
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Key

- Hybrid Application Boundary
- Development Parcel
- Main Site Access (Vehicular, bus, pedestrian, cycle and secondary)
- Pedestrian and Cycle Site Access Only
- Pedestrian Site Access Only
- Emergency Vehicular Access
- Primary Street and Bus Route
- Secondary Street
- Indicative Footpaths and Cycleways
- Pedestrian Only Access to Gardens
- Public Squares
- Scheduled Monument

Notes
 The proposed primary and secondary streets include carriageway, green verges, street plantings, sewers, footways and cycleways.
 Alignment of the secondary streets, footways and cycleways are indicative only and subject to detailed design.
 Alignment and design of the bridge crossing over the river is subject to detailed design.

PI	37.06.22	Planning Submission	RM	PI
Rev	Date	Description	Drawn	Check
Drawing Status				
For Planning				



Client
Carrow Works, Nowrich

Drawing Title
**Parameter Plan
 Access & Movement**

Scale @A1 1:1000 Job Ref: 02022
 Drawing No: PP-06 Revision: P1
 Scale Bar 0 10 20 30 40 50 m
 Sheet Code: 02022-JTP-PP-06 - Access & Movement - P1

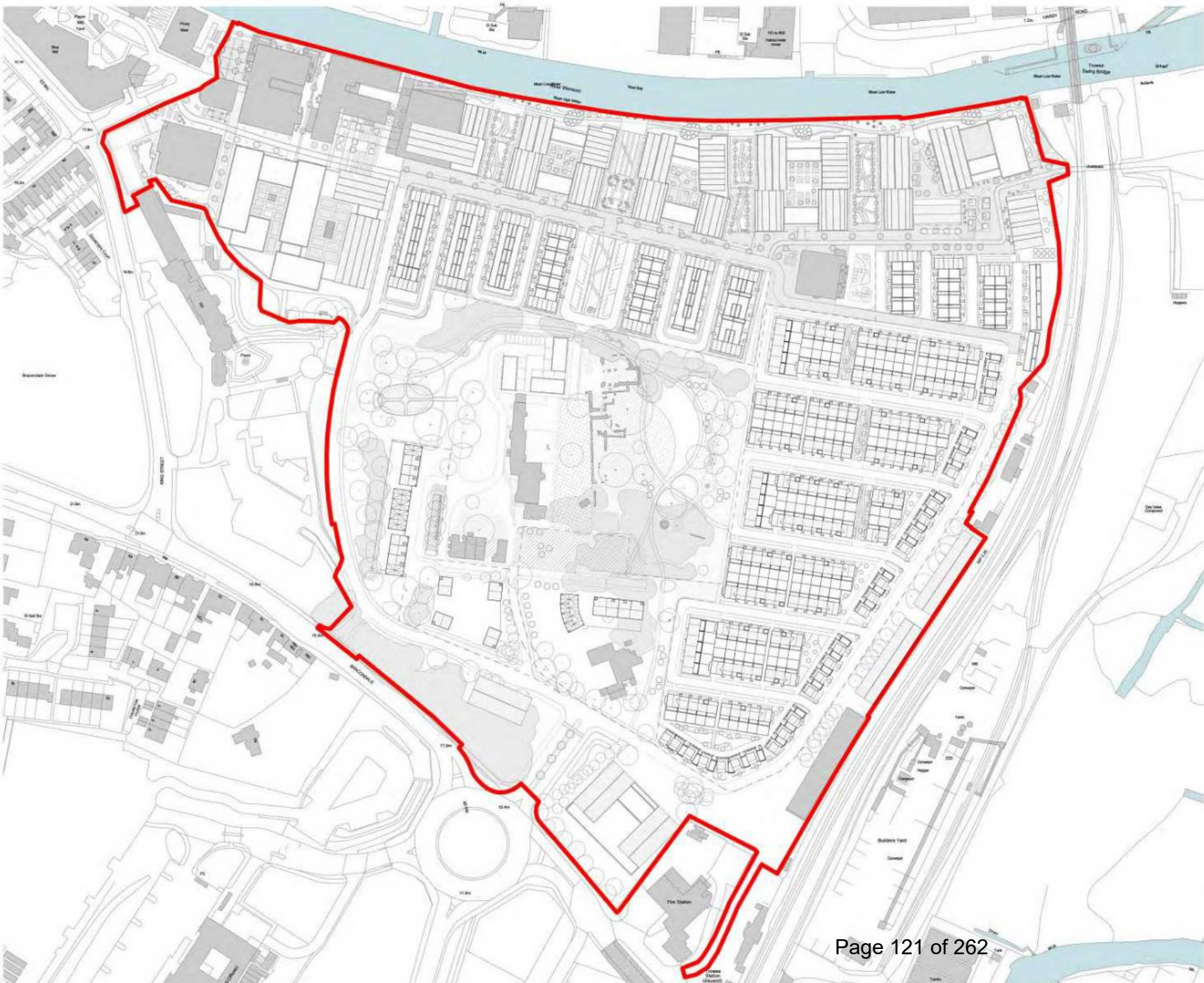
Notes

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Key

Hybrid Application Boundary



PI	31.06.22	Planning Submission	BM	#
Rev	Date	Description	Drawn	Check
Drawing Status				
For Planning				



Client
Carrow Works, Nowrich

Drawing Title
**For Illustrative Purposes Only
 Proposed Site Plan**

Scale @A1	1:1000	Job Ref	02022
Drawing No.	MP-01	Revision	P1
Scale Bar	0 10 20 30 40 50 m		

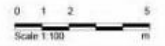
Sheet Code
 02022-JTP-MP-01 - Proposed Site Plan - P1



1 West Elevation (Main Entrance)
2200 1:100



2 East Elevation (Garden/Schedule Monument)
2200 1:100



Notes

- Any deep format drawing is to be read in conjunction with and at the scale of the accompanying cut.
- Where colours other than black or grey are used, the drawing must be printed in colour.
- For status 'C' (Construction) drawings all dimensions are to be checked on site by the contractor, scaling is for Local Authority purposes only.
- Unless otherwise indicated, all dimensions are in millimeters.
- All information on this drawing is to be read in conjunction with the relevant Donald Insall Associates specification and trade contractor drawings and information by specialists.
- In the event of any discrepancy, please contact us immediately.
- This drawing may contain survey information by others and is to be used solely for the purposes for which it was issued.
- There are unannotated discrepancies issued for information purposes only. If you have any queries regarding the drawings, please contact DIA immediately.
- Please note DIA cannot be held responsible for any errors arising from changes made to an uncontrolled drawing.

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Drawing Status

- FF Feasibility
- PS Sketch Design
- PR Planning
- BD Building Control
- DD Developed Design
- MM Measurement
- AT Tender
- SC Construction
- RR Record

Rev	Date	Des	Auth	Revision
2	20-06-22	NXA		Planning issue
1	27-06-22	NXA		Preparation for submission following town and client review
0	22-06-22	NXA		Design development review with town

Rev	Date	Des	Auth	Revision
2	20-06-22	NXA		Planning issue
1	27-06-22	NXA		Preparation for submission following town and client review
0	22-06-22	NXA		Design development review with town

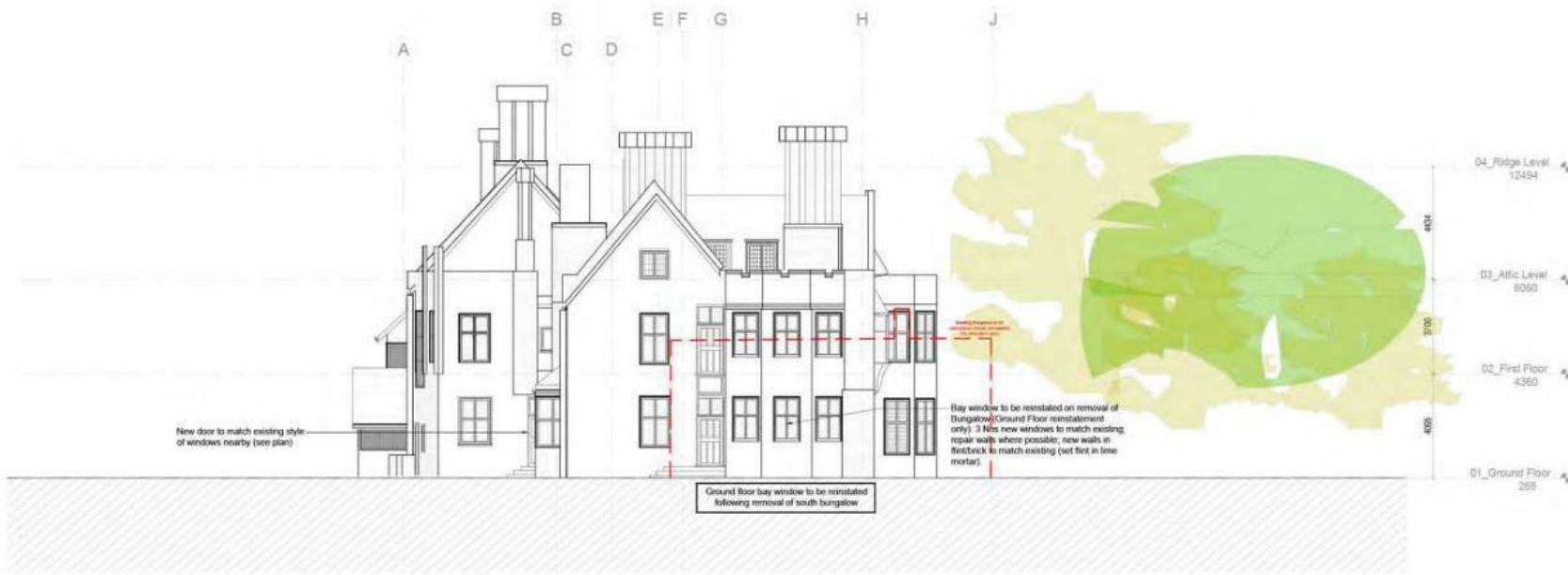
Donald Insall Associates
Chartered Architects and Historic Building Consultants

Milton Hall, Ely Road,
Milton, Cambridge CB24 6WZ
(+44) 01223 303 111
cambridge@gmail-architects.co.uk

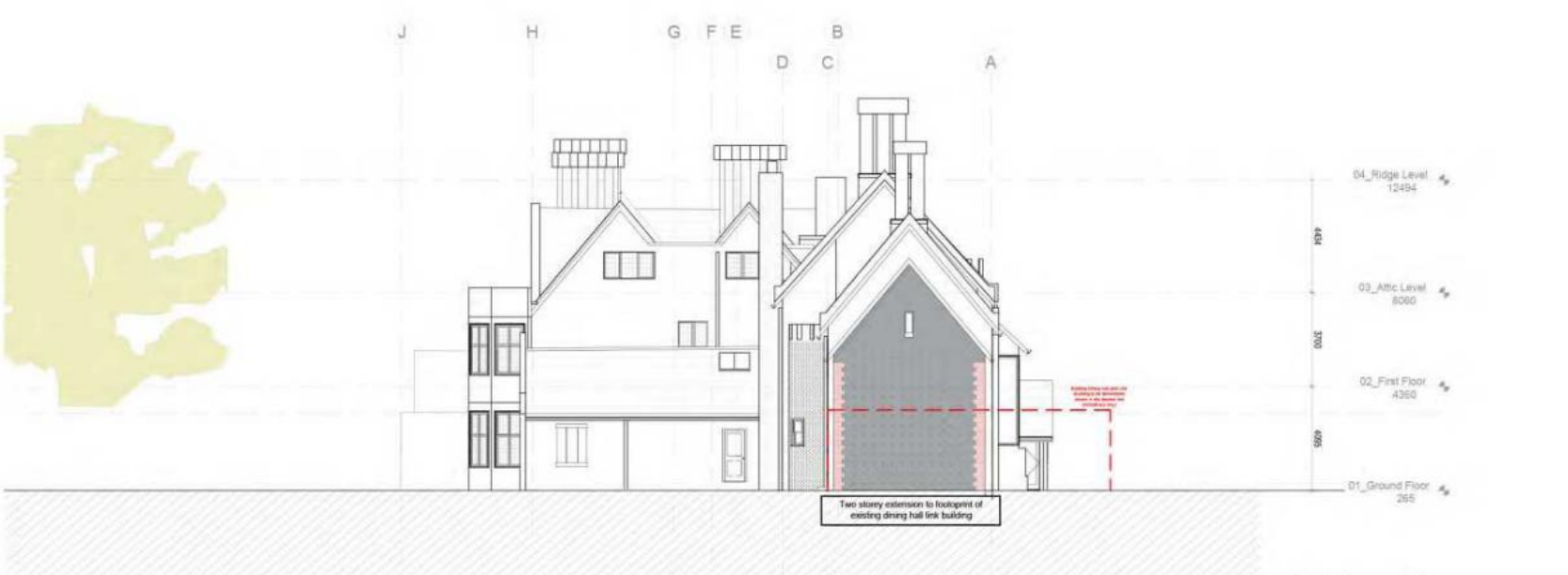
Carrow Works, Norwich

Carrow Abbey; Proposed Elevations
West (Main) and East (Garden)

Project	CWN.01	No	DR-2200
Scale (A1)	1:100	Status	3P
		Revision	2



1 South Elevation (To Car Park)
2201 1:100



2 North Elevation (to Dining Hall)
2201 1:100



Notes	Drawing Status
1. Any deep formal drawing is to be read in conjunction with and at the scale of the accompanying pdf. Where colours other than black or grey are used, the drawing must be printed in colour.	1F Feasibility
2. For status 'C' (Construction) drawings all dimensions are to be checked on site by the contractor, scaling is for Local Authority purposes only.	2S Sketch Design
3. Unless otherwise indicated, all dimensions are in millimetres.	3P Planning
4. All information on this drawing is to be read in conjunction with the relevant Donald Insall Associates specification and trade contractor drawings and information by specialists.	4B Building Control
5. In the event of any discrepancy, please contact us immediately.	4D Developed Design
6. This drawing may contain survey information to others and is to be used solely for the purposes for which it was issued.	4M Measurement
7. These are uncontrolled documents issued for information purposes only. If you have any queries regarding the drawings, please contact DIA immediately.	4T Tender
8. Please note DIA cannot be held responsible for any errors arising from changes made to an uncontrolled drawing.	5C Construction
	6R Record

Rev	Date	Des	Auth	Revision
2	20-05-22	NAA		Planning Issue
1	27-05-22	NAA		Preparation for submission following team and client review
0	23-05-22	NAA		Design development review with team

Donald Insall Associates
Chartered Architects and Historic Building Consultants

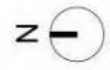
Milton Hall, Ely Road
Milton, Cambridge CB24 6WZ
(+44) 01223 303 111
cambridge@insall-architects.co.uk

Carrow Works, Norwich

Carrow Abbey: Proposed Elevations
South and North

Project	CWN.01	No	DR-2201
Scale (A1)	1:100	Status	3P
		Revision	2

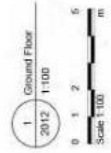
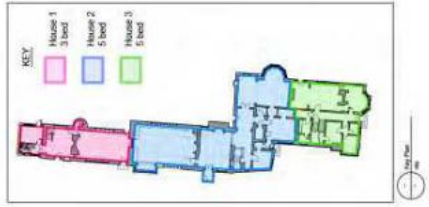
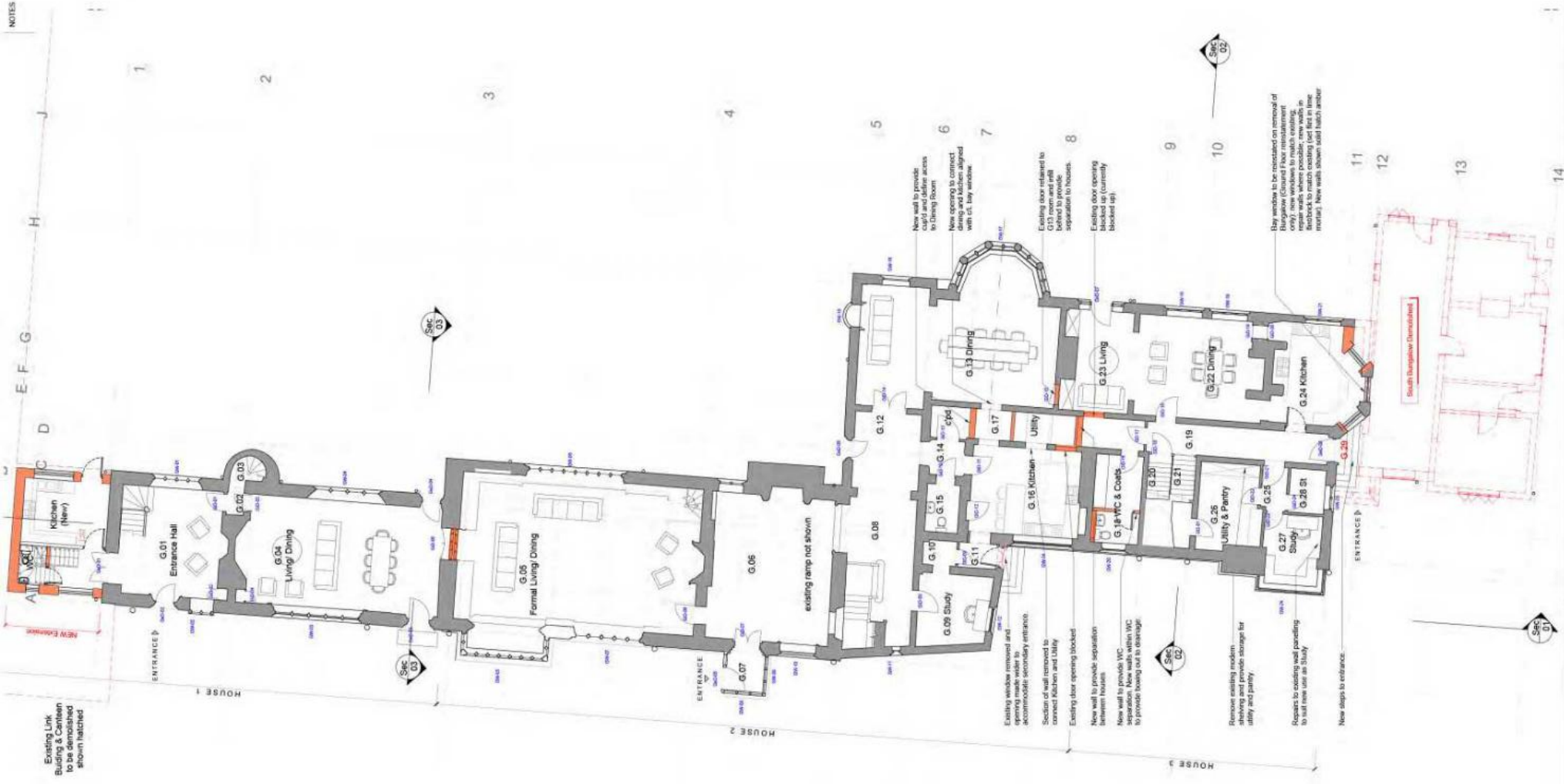
NOTES



KEY

- Existing
- Demolition (wall, door & windows)
- New Construction (new wall, door, window, heating out)

Refer to co-ordinated drawings:
 DR-1005 - Series Existing
 DR-2005 - Series Proposed
 DR-3005 - Series Demolition



Notes

1. Any new structural work to be carried out in accordance with the relevant building regulations.
2. For items 'C' (Construction) drawings of elements to be demolished are to be checked on site by the contractor.
3. Utility services indicated, all dimensions are in millimeters.
4. Approximate specifications and trade contracts (where appropriate) are to be provided to the contractor.
5. This drawing is a construction drawing and is not to be used as a basis for any other drawings.
6. This drawing is a construction drawing and is not to be used as a basis for any other drawings.
7. This drawing is a construction drawing and is not to be used as a basis for any other drawings.
8. All dimensions are in millimeters unless otherwise stated.
9. All dimensions are in millimeters unless otherwise stated.
10. All dimensions are in millimeters unless otherwise stated.
11. All dimensions are in millimeters unless otherwise stated.
12. All dimensions are in millimeters unless otherwise stated.
13. All dimensions are in millimeters unless otherwise stated.
14. All dimensions are in millimeters unless otherwise stated.

Drawings Status

Rev	Date	Drawn	Checked	Approved	Notes
3	20/04/22	NMA	-	Planning mark	
2	27/03/22	NMA	-	Design development	Preparation for planning
1	10/03/22	NMA	-	Draw for jobs	
0	04/03/22	NMA	-	Initial issue	

Notes

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Key

--- Footprint of existing building on site



PI 17.06.22 Planning Submission IM IF

Rev Date Description Drawn Check

Drawing Status
For Planning

Client
Fuel Properties

jtp JTP Studios, Unit 5
The Barn Warehouse
Parnhampton Street
London, E7 9JZ
+44 (0)20 7217 0700
www.jtp.co.uk

Project
Carrow Works, Nowrich

Drawing Title
Proposed Site Layout
Dining Hall - Ground Floor Plan

Scale @A1 As Indicated Job Ref: 02022

Drawing No: MP-04 Revision: P1

Scale bar 0 10 20 30 40 50 m

Sheet Code 02022-JTP-MP-04 - Dining Hall - Ground Floor Plan - P1

Notes

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North Elevation
1 : 100



East Elevation
1 : 100



South Elevation
1 : 100



West Elevation
1 : 100

P1 27.08.22 Planning Submission B11 IP

Rev Date Description Drawn Check

Drawing Status For Planning



Client Carrow Works, Nowrich

Drawing Title Proposed Site Layout Dining Hall - Street Elevations

Scale @A1 1 : 100 Job Ref: 02022

Drawing No: MP-07 Revision: P1

Scale Bar 0 10 20 30 40 50 m

Sheet Code 02022-JTP-MP-07 - Dining Hall - Street Elevations - P1

East Norwich Strategic Regeneration (ENSRA) – extract from East Norwich Masterplan



The application site (together with Carrow House) is located in area 1

**Assessment of Impacts under the Conservation of Habitats & Species
Regulations 2017 (as amended)**

Site Affected: Broads SAC/Broadland Ramsar

Potential effect: Increased nitrogen and phosphorus loading

The application represents a 'proposal or project' under the above regulations. Before deciding whether approval can be granted, the Council as a competent authority must undertake an appropriate assessment to determine whether or not the proposal is likely, either on its own or in combination with other projects, to have any likely significant effects upon the Broads SAC, and if so, whether or not those effects can be mitigated against.

The Council's assessment is set out below and is based on advice contained in the letter from Natural England to LPA Chief Executives and Heads of Planning dated 16th March 2022.

Broads SAC/Broadland Ramsar

- i. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
- ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer: YES

The proposal would result in an increase in overnight accommodation in the catchment area of the SAC/Ramsar. Consequently, the proposal has the potential to result in an increase in nutrients flowing into the SAC in the form of either nitrogen or phosphorous.

As a result the "Flow Diagram of HRA Process for Consultations Contributing Nutrients" has been followed. This diagram forms appendix E in the aforementioned letter from Natural England.

Having followed the diagram for this application we reach the conclusion in the bottom section that begins "Can't conclude no adverse effect on site integrity...". As a result, the existing application cannot be considered to comply with the Habitat Regulations as it cannot conclude that there would be no likely significant impacts. It cannot be concluded that the additional wastewater created by the extra residents would not have a Likely Significant Effect (LSE), in-combination with other plans and projects, on the SACs.

There is currently no agreed strategy for mitigating the wastewater implications of additional accommodation in the Council's area nor anything submitted with the application which would indicate that the development could achieve nutrient neutrality.

It is therefore concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in nitrate and/or phosphate levels which would further adversely affect the current unfavourable

status of the Broads Special Area of Conservation. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of this Special Area of Conservation and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; Policy DM6 of the Norwich Local Plan Development Management Policies 2014; paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023) and Policy GNLP3 of the Greater Norwich Local Plan 2024.

Site Affected:

Wash ZOI

- **The Wash SPA**
- **The Wash and North Norfolk Coast SAC**
- **The Wash Ramsar**

Norfolk Coast ZOI

- **North Norfolk Coast SAC**
- **North Norfolk Coast SPA**
- **North Norfolk Coast Ramsar**

Valley Fens ZOI

- **Norfolk Valley Fens SAC**

East Coast ZOI

- **Winterton – Horsey Dunes SAC**
- **Great Yarmouth North Denes SPA**

Broads ZOI

- **Broadland SPA**
- **Broadland Ramsar**
- **Breydon Water SPA**

Potential effect: Increased recreational disturbance

The application represents a 'proposal or project' under the above regulations. Before deciding whether approval can be granted, the Council as a competent authority must undertake an appropriate assessment to determine whether or not the proposal is likely, either on its own or in combination with other projects, to have any likely significant effects upon the above listed Habitats Sites, and if so, whether or not those effects can be mitigated against.

The Council's assessment is set out below;
For any of the sites listed above;

- i. Does the plan or project include one of the affected development types identified in the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy? AND
- ii. Is the plan or project within one of the identified 'Zones of Influence' of Habitats Sites for which residents travel for recreational activities?

Answer: YES

The proposal would result in the provision of new dwellings which will result in an increase in population. Consequently, the proposal has the potential to result in more people visiting and possibly harming Habitats Sites.

iii. Do the proposals include necessary avoidance and mitigation measures (e.g. provisions for payment of the per dwelling tariff for the Norfolk wide RAMS).

Answer: NO

iv. Do the proposals include necessary provision or enhancement of green infrastructure, either on the development site or nearby to meet the informal recreational needs of the residents.

Answer: NO

Without the provisions within the application for payment of the Norfolk RAMS tariff and the provision or enhancement of adequate green infrastructure on or off-site we reach the conclusion “Can’t conclude no adverse effect on site integrity...”. As a result, the existing application cannot be considered to comply with the Habitat Regulations as it cannot conclude that the additional recreational impacts created by additional visits from the extra residents would not have a Likely Significant Effect (LSE), in-combination with other plans and projects, on the identified Habitats Sites (SACs and SPAs).

It is concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in recreational disturbance due to the impact of additional visits to Special Areas of Conservation (SACs and SPAs) in the Wash, Norfolk Coast and the Broads. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of these Habitats Sites and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; Policy DM3, DM6 and DM8 of the Norwich Local Plan Development Management Policies 2014; paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023) and Policy GNLP3 of the Greater Norwich Local Plan 2024.

Greater Norwich Local Plan (extract)East Norwich text in **bold** below**POLICY 7.1 - The Norwich Urban Area including the fringe parishes**

Norwich and the fringe parishes will be the area's major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal. The area will provide 27,960 additional homes and sites for a significant increase in jobs, including around 257 hectares of undeveloped land allocated for employment use.

To achieve this, development sites will be focussed in the city centre, in strategic regeneration areas in East Norwich and the Northern City Centre and at strategic urban extensions in the north-east and west as well as other locations across the urban area as follows:

Housing

Part of Norwich Urban area	Existing planning permissions (including completions 2018/19 -2021/22).	Homes forecast to be delivered from allocated sites by March 2038	Total deliverable housing commitment 2018 - 2038
City centre			
Northern City Centre Strategic Regeneration Area	584	1,023	1,607
Other city centre sites	2,664	610	3,124
City centre total	3,248	1,633	4,731
East Norwich			
East Norwich Strategic Regeneration Area	770	2,230	3,000
Elsewhere in the urban area (* denotes strategic urban extensions)			
Colney	4	111	115
Costessey	581	0	581
Cringleford*	1,257	508	1,765
Drayton	415	0	415
Easton*	963	0	963
Hellesdon*	1,151	0	1,151
Other sites in Norwich	1,624	315	2,089

Three Score, Bowthorpe*	903	0	903
Taverham*	93	1,425	1,518
The Growth Triangle*	9,359	760	10,119
Thorpe St. Andrew	404	0	404
Trowse	181	0	181
Other sites in urban area	23	0	23
Elsewhere in urban area total	16,958	3,119	20,227
Norwich Urban Area Total	20,976	6,982	27,958

Employment

Part of Norwich Urban Area	Existing undeveloped employment allocations (hectares, April 2018)	New allocations (hectares)	Total undeveloped employment allocations (hectares)
See policies 1 and 6 for the strategic sites in the Norwich Urban Area	187.9	46.9	245.8
Hellesdon	1.4	0	1.4
Taverham	5.6	0	5.6
Harford Bridge	4	0	4
Norwich urban area total	198.9	46.9	256.8

Other small-scale housing and employment development will be acceptable in principle elsewhere in the Norwich urban area subject to meeting other policies in the development plan.

The City Centre

Norwich city centre's strategic role as key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high density mix of employment, housing, leisure and other uses. Intensification of uses within the city centre to strengthen its role as a main regional employment, retail, cultural and visitor centre, providing a vibrant and diverse experience for all, will be supported.

Comprehensive redevelopment of the large district centre at Anglia Square and surrounding vacant land will provide a viable, high density, housing-led mixed-use

development including retailing, employment, community and leisure facilities. The redevelopment of Anglia Square will be the catalyst for change in the wider Northern City Centre strategic regeneration area identified on the Key Diagram and defined in map 10.

1. Economy

To ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters.

To support this, loss of existing office floorspace will be resisted:

1. a) Within the areas defined under the 'Article 4 direction relating to the conversion of offices to residential';
2. b) For all statutory listed office buildings situated within the city centre (as defined by map 10);

unless it can be demonstrated that its loss will not be of detriment to Norwich's office economy.

Development of buildings for further and higher education, training and lifelong learning will be supported in the city centre. The development of purpose-built student accommodation will be accepted where it accords with the criteria in policy 5.

2. Retail and main town centre uses

The retail function of the City Centre's primary and secondary retail areas and the large district centres will be supported as part of a complementary range of uses. Provision for any additional comparison retail floorspace will be focused on these centres in accordance with the sequential approach and improvements to the quality of existing retail provision will be supported.

Proposals for new development and change of use in the City Centre's primary and secondary retail areas and the large district centres (as defined in policy 6) will be permitted where they:

-
- Promote diversification of services and facilities to ensure that vitality and vibrancy can be maintained throughout the day and evening; or
- Provide mixed-use development including housing, high quality employment, flexible working, education, leisure, culture and entertainment, where this supports and complements the function of the centre; or
- Secure the beneficial redevelopment and adaptation of disused and underused land and premises including redundant retail floorspace and adaptation of upper floors to residential uses.

3. Leisure, culture and entertainment and the visitor economy

The city centre's leisure cultural and entertainment offer will be supported and expanded. Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre's role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs. Leisure uses, including uses supporting the early evening economy, will be accepted within the defined city centre where they:

- Are compatible with the surrounding uses;
- Would not give rise to unacceptable amenity and environmental impacts which could not be overcome by the imposition of conditions; and
- Would not have a detrimental impact upon the character and function of the city centre or undermine its vitality and vibrancy.

Late-night uses will only be accepted in the designated Late-Night Activity Zone.

4. Housing

To maximise the potential of the city centre to deliver new homes, housing shall be provided on the allocated sites detailed in the Sites document.

5. The Built, Natural and Historic Environment

To protect and enhance the distinctive natural and built environment and heritage assets of the city centre:

- A programme of improvements to public spaces, as illustrated in a public realm infrastructure plan, will be implemented through a combination of public investment on the highway / publicly owned land and private investment in association with development proposals.
- New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), providing innovative and sustainable design; in particular in relation to scale, mass, height, layout and materials.
- Riverside development will have regard to the policies/ priorities of the River Wensum Strategy (or any successor), including provision of a riverside walk.

6. Access and Transportation

Development will be required to contribute to measures promoted by Transport for Norwich to improve accessibility, connectivity, legibility and permeability within the city centre.

East Norwich

Development of sites allocated in the East Norwich Strategic Regeneration Area (ENSRA) identified on the Key Diagram and defined on map 10 including Carrow Works (which includes Carrow House), the Deal Ground (including the former May Gurney site), the Utilities Site and Land in front of ATB Laurence Scott will create a highly sustainable

mixed-use quarter accommodating substantial housing growth and optimising economic benefits. It will provide in the region of 3,362 homes and significant new employment opportunities for around 4,100 jobs.

Redevelopment of the ENSRA will be guided by an area-wide Supplementary Planning Document (SPD). The SPD will promote development of a locally distinctive, high density and high quality sustainable residential-led mixed-use community which takes full account of its setting and makes the most of its riverside location.

The SPD will provide the framework for seeking new transport infrastructure (through integrated access and transportation) which emphasises sustainable accessibility and traffic restraint and allows for connectivity and permeability within and between the sites and beyond), social infrastructure, jobs and services.

Development must also protect and enhance biodiversity and green infrastructure; provide for sustainable energy provision and its management; conserve, and where opportunities arise, enhance the significance of heritage assets; and address local issues including the active railway, the protected minerals railhead, noise, contamination and flood risk issues.

Whilst proposals within the ENSRA may come forward on different timescales, it is important that development is guided and informed by the SPD and should meet the site wide and site specific requirements set out within site allocations policy STR.01.

Elsewhere in the urban area including the fringe parishes

The remainder of the urban area including the fringe parishes will provide for a significant proportion of the total growth in Greater Norwich. Development will provide a range of sites for different types of housing, employment and community uses that are accessible and integrate well with the existing communities. It will provide necessary infrastructure, with a focus on public transport, walking and cycling, as well as social and green infrastructure.

Growth will include:

- Development of strategic and smaller scale urban extensions at existing locations committed for housing and employment uses as set out in the tables above (including that within the adopted Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan), with uplift on existing allocated sites in Cringleford, Easton and Three Score (Bowthorpe);
- Significant new development proposals (including the expansion of the Norwich Research Park, and a large new allocation for homes in the Growth Triangle in Sprowston);
- Development at the University of East Anglia to cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and its limited expansion;

- Development sites in the Sites document which will support neighbourhood-based renewal on brownfield sites, with densities highest in the most accessible locations; and
- Enhancements to the green infrastructure network which will include links to and within the Wensum, Yare, Tud and Tas Valleys, Marriott's Way and from Mousehold through the north-east growth triangle as set out in maps 8A and B, along with local networks.

Greater Norwich Local Plan (extract)

STRATEGIC ALLOCATION

Policy STR.01

East Norwich Strategic Regeneration Area (ENSRA) incorporating:

- 1. Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (approx. 21.35 ha).**
- 2. Land at Carrow Works, including Carrow House, Norwich (approx. 19.91 ha).**
- 3. Utilities Site, Norwich (approx. 6.92 ha).**
- 4. Land in front of ATB Laurence Scott (0.39 ha).**

Development across the East Norwich Strategic Regeneration Area will achieve the following site-wide requirements:

1. Development should be undertaken comprehensively and be guided and informed by the SPD for the East Norwich Strategic Regeneration Area required by policy 7.1 (including in accordance with any phasing plan). Proposals should not prejudice future development of or restrict options for the other sites within the East Norwich Strategic Regeneration Area.
2. Development should be guided and informed by the movement and connectivity framework set out within the SPD. Proposals must enable connectivity and permeability within and between the sites in the strategic regeneration area and beyond. Proposals should be designed for ease of access to, and by, public transport, with appropriate bridge provision to ensure the sites are fully permeable by sustainable transport modes. The travel impacts of the sites on the transport network must be appropriately managed. Planning applications must be supported by a comprehensive Transport Assessment which considers the whole of the strategic allocation.
3. Development must create an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing need along with opportunities to access high quality jobs and services.
4. Co-ordinated delivery of new social infrastructure (e.g. a new primary school, neighbourhood shopping centre, health facilities and recreational spaces including public open spaces and child play spaces) and economic infrastructure (e.g. transport routes, bridges and utilities) and services, as informed by the SPD.
5. Make the most of its riverside location, including provision of a riverside walk along the northern and southern banks of the River Wensum, linking the sites and providing connections to Norwich City Football Club and the city centre as well as the establishment of a recreational route to Whitlingham County Park suitable for accommodating National Cycle Route 1 (NCR1). This will be designed to allow future extension of the pedestrian and cycle network to serve other surrounding regeneration opportunity sites east of the city centre

- should they become available, including improved access routes to Kerrison Road and Hardy Road over or under the railway line north of Trowse Swing Bridge and south of the river between the Deal Ground and Carrow Works.
6. Achievement of an exemplar high quality, high density, locally distinctive design of a scale and form which respects its context and setting and makes the most of its riverside setting. Proposals must establish strong built frontages along the River Wensum and the defining network of street and spaces with the sites. Design should also take account of the significance of heritage assets on and off site and protected trees as informed by the SPD.
 7. There will be the general presumption in favour of the repair and re-use of heritage assets on site as part of any redevelopment proposals, however any application will be considered on its merit. Great weight will be given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designated heritage assets affected by the proposal on and off site including key views from and into the site. Development proposals should draw upon local character and distinctiveness and conserve, or where opportunities arise, enhance the character and appearance of the conservation areas affected, the scheduled monument, listed buildings, locally listed buildings and other non designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting). Development proposals should also consider heritage assets below ground and the impact upon the Broads.
 8. Proposals will maintain the open character of the Yare Valley and preserve long views towards the Broads and open countryside.
 9. Development proposals will include protection and enhancement of the existing biodiversity of the site including green infrastructure assets, corridors, trees and open spaces. Development must enhance linkages from the city centre to the Broads, Carrow Abbey Country Wildlife Site, the woodlands, the wider rural area and elsewhere in Norwich. Development must also achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and River Yare and to the locally registered historic park and garden, along with appropriate improved public access.
 10. Be designed to mitigate the impact of vibration, noise generation, light and air pollution from adjacent industrial operations, roads and railways in order to protect the amenity of users and occupiers of the sites.
 11. Proposals for development must ensure that they will not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility.
 12. Development proposals must address and remediate site contamination.
 13. An archaeological assessment will be required prior to development.
 14. Site specific flood risk assessment must be undertaken prior to development and the design of the development will need to be flood resilient and incorporate appropriate mitigation measures in order to address flood risk from both river and surface water flooding.
 15. Development must allow scope for greater use of the Rivers Wensum and Yare for water based recreation, leisure and tourism including the potential inclusion of marinas and riverside moorings.

Carrow Works

Development must also achieve the following site-specific requirements:

1. Proposals will include the conservation and long term management of the scheduled monument and listed buildings on the site and provide a suitable setting for designated heritage assets affected by the proposals on and off site. Proposals, which seek to convert, alter or demolish locally listed buildings or have a harmful impact on the significance of their setting, will be considered on their merits. Clear justification for all proposals will be required.
2. Proposals will be required to adopt and implement a strategy of heritage interpretation relating to both the heritage assets of the site, and the use(s) of the site.
3. Deliver the following key infrastructure having regard to the phasing plans and trigger points to be set out in the SPD and subject to viability testing through individual planning applications:
 - a) Provision of a high-quality east-west pedestrian/cycle route to connect King street to the railway underpass, and facilitate enhancement works to the underpass.
 - b) Provision of a pedestrian/cycle bridge over the River Wensum (linking to Carrow Road).
 - c) Provision of key road infrastructure across the Carrow Works site (built to adoptable standards and able to accommodate public transport).
 - d) Provision of a second point of access to King Street, the detail of which will be determined through a Transport Assessment.
 - e) Provision of high-quality pedestrian/cycle routes to both the city centre and Bracondale.
 - f) Off-site improvements to the highway network including junction enhancements and improved crossing facilities, the detail of which will be determined through a Transport Assessment.
 - g) Safe and convenient cycle route through the Carrow Works site connecting Martineau Lane roundabout to King Street.
 - h) Provision of a serviced site for a two form entry primary school.
 - i) Provision of land for a health facility sufficient to serve the East Norwich development as a whole.
 - j) Provision of a neighbourhood shopping centre to meet the day to day needs of future residents and to be delivered in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means.



Committee name: Planning applications

Committee date: 21/03/2024

Report title: **Application no 23/01574/F 77A Vincent Road, Norwich, NR1 4HQ**

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

To determine:

Application no: 23/01574/F

Site Address: 77A Vincent Road Norwich NR1 4HQ

Decision due by: 26/03/2024

Proposal: Change of use of first floor accommodation (C3) to mixed use (E).

Key considerations:

1. Principle of development
2. Amenity
3. Transport

Ward: Crome

Case Officer: Danni Howard

Applicant/agent: Chris Baker

Reason at Committee: Objections

Recommendation:

It is recommended to approve the application for the reasons given in the report and subject to the planning conditions set out in paragraph 38 of this report, and grant planning permission.



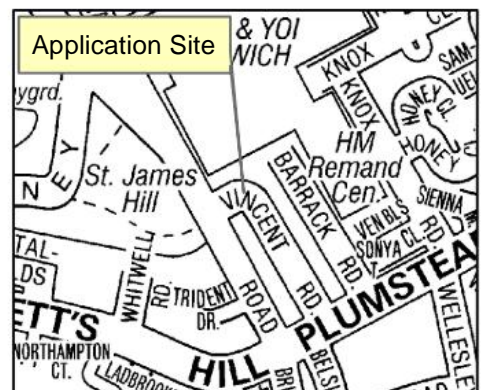
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Planning Application No 23/01574/F
Site Address 77A Vincent Road

Scale 1:500



NORWICH
City Council
PLANNING SERVICES



The site and surroundings

1. 77A Vincent Road is a maisonette located on a corner plot at the eastern end of a terrace located on the south side of Vincent Road. There is a kitchen at ground floor level with the main living space of the property formed on the first floor, extending over the ground floor retail unit 77B, which is currently in use as a hairdressers. The property is accessed from the south elevation via the rear garden area which is brickweaved and open on the east side for vehicle access to the detached, flat roof garage which forms the rear and east side boundary treatments.
2. Planning permission was granted under reference 22/01219/F to reconfigure the living space by converting the garage to bedroom space and using the upstairs space for an open kitchen and living area. An extension from the garage to the main building would provide enclosed access between the spaces. At the time of writing this report the permission does not appear to have been implemented. As such the extensions are considered as shown on the plans for this application.
3. The surrounding area is largely residential in character, featuring narrow terraced dwellings using a mix of red brick and painted render across the frontages. The subject site is unique within the streetscape with the formation of the non-residential unit at ground floor and benefitting a wider site than its surrounding neighbours due to its corner position.

Constraints

4. There are no relevant site constraints affecting the site.

Relevant Planning History

5. The records held by the city council show the following planning history for the site.

Case no	Proposal	Decision	Date
22/01219/F	Rear single storey extension and garage conversion.	Approved	25/11/2022

The Proposal

6. Change of use of first floor from residential (Class C3) to hairdressers (Class E) to provide additional floorspace for existing hairdressers operating at ground floor from 77B Vincent Road.
7. Insertion of a door on the east side to provide access to the ground floor unit 77B.

Summary of Proposal – Key facts:

8. The key facts of the proposal is summarised in the tables below:

Scale	Key Facts
Total floorspace	Floorspace subject to change of use: 40m ² . Residential floorspace as existing =51m ² . Residential floorspace as proposed = 48.2m ² .

Operation	Key Facts
Opening hours	The opening hours of the existing ground floor hairdressers are: Monday: Closed Tuesday: 9am-6pm Wednesday: 9am-6pm Thursday: 10am-8pm Friday: 9am-6pm Saturday: 9am-5pm Sunday: Closed See the Amenity, Transport and Conditions sections for details of the proposed opening hours of the first floor.

Transport Matters	Key Facts
No of car parking spaces	1 no. off road parking space will remain within the garden space of 77A. Vincent Road is not in a controlled parking zone and permits aren't required for on-street parking by residents or salon staff/customers.
Servicing arrangements	Existing arrangements for residential and commercial waste collections for both units will remain unchanged.

Representations

9. Adjacent and neighbouring properties have been notified in writing. 4 letters of representation have been received citing the issues as summarised in the table below:

Issues raised	Response
Concerns over car parking for additional customers and staff	See Main Issue 3
Noise from the salon travels through neighbouring property at all times of day and night and extension will run adjacent bedrooms.	See Main Issue 2
Daylight/sun issue for gardens of no. 79 and 81 as well as access to wooden fence on boundary with 77 and 79.	There are no external works proposed against the boundary as part of this application. Although not specified in the comment it is believed this concern is in reference to the ground floor extension to the garage. These concerns were raised and considered under the relevant application, reference 22/01219/F, which was approved on 25.11.22. It is therefore not appropriate to consider this any further within the realm of the current application.

Issues raised	Response
Need for expansion shows business has outgrown its location and is no longer suitable for the area.	See Main Issue 1
Loss of privacy by overlooking into bedroom and living room of nos. 88 and 90 Vincent Road from customers using first floor.	See Main Issue 2

Consultation responses

10. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Statutory and non-statutory consultees

Environmental Protection (Norwich City Council)

11. No objections to this application.

Highways (local highways authority) (Norfolk County Council)

12. Thank you for consulting the highway authority. It is understood that a previous planning consent 22/01219/F has converted the rear garage to a dwelling, and that the proposed change of use will convert the former upstairs dwelling into additional salon space. The application form cites that there is no increase in staff numbers, although it is expected that with the additional salon space two new chairs are expected to be provided for clients.

At present this premises has a rear parking space, and a single car space on the forecourt, the application states the loss of a single car parking space, there is no indication how this car parking is used between the dwelling or business or of any cycle parking provided. There is no information about EV charging provision on site.

Vincent Road is a 20mph street and has no record of injury accidents in the vicinity of the site, it is street lit and has footways on either side, it is a predominantly residential street, it is not in a controlled parking zone and on-street parking is therefore unrestricted other than the presence of a no waiting restriction (double yellow lines) around the adjacent corner of Vincent Road. It is not known how many staff or customers would drive by car to the premises. The residential use would then transfer to the rear part of the site.

Vincent Road is known to have high demand for on-street from its residents, and this proposal conceivably will lead to a small amount of additional car parking demand (given one car space is lost and there are additional customers) that may affect availability of on-street parking in a minor way. Alternative parking is available in the vicinity on Britannia Road, particularly near to Mousehold Heath. It is difficult to raise an objection.

The extant rear vehicle access is already likely to suffer from access issues given that there are no restrictions to control parking. Norfolk County Council highways now offers a service whereby white H bar markings may be requested and if approved paid for by the applicant. This does not require

planning consent and does not require a Traffic Regulation Order. As there is no intensification of use of this access, the provision of such a road marking is not being recommended as a necessity, but it is a discretionary matter the applicant may wish to consider.

Given that the premises is an established business and the increased number of trips to the site is relatively low, and a large amount of on-street parking is available within walking distance of the salon, it is not considered that a recommendation of refusal can be justified. There are no recommended conditions.

Assessment of Planning Considerations

Relevant Development Plan Policies

13. Greater Norwich Local Plan for Broadland, Norwich and South Norfolk adopted March 2024 (GNLP)

- GNLP2 Sustainable Communities
- GNLP6 The Economy

14. Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

- DM1 Achieving and delivering sustainable development
- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design
- DM16 Supporting the needs of business
- DM28 Encouraging sustainable travel
- DM29 Managing car parking demand in the city centre
- DM30 Access and highway safety
- DM31 Car parking and servicing

Other material considerations

15. Relevant sections of the National Planning Policy Framework 2023 (NPPF):

- NPPF9 Promoting sustainable transport
- NPPF12 Achieving well-designed places

Case Assessment

16. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Policy Framework (NPPF), the council's standing duties, other policy documents and guidance detailed above, and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

Main Issue 1. Principle of development

17. Key policies and NPPF paragraphs – DM1, DM2, DM16, GNLP2, GNLP6, NPPF paragraphs 8 and 130.
18. The proposed development will not result in the loss of a dwelling, seeking to accommodate the change of use by reconfiguring the existing living space. The remaining residential floorspace is 1.8m² short of meeting the internal space standards for 2 people at 50m² but exceeds the 1person requirements. The internal storage area falls 0.3m² short of the required 1.5m². The shortfall is not considered significantly harmful, and the living space is considered to remain adequate with regards to the requirements of policy DM2. If the extensions as approved under 22/01219/F aren't completed prior to the change of use taking place then there would not be sufficient residential floorspace remaining to be used as a single dwelling. It is therefore considered prudent that completion of the approved extensions is conditioned to take place prior to the change of use.
19. The existing commercial unit has been in use as a hair salon/barbers for over 16 years and occupied by several businesses in that time. Concerns have been raised by way of objection that the need for expansion indicates that the business has outgrown the area. The alterations are proposed to improve facilities for the existing staff members and customers by adding additional wash basins, a colour mixing room and staff respite area. The additional floorspace is modest in size and is unlikely to significantly increase the number of customers which can be accommodated at any one time.
20. Hairdressers fall within Use Class E, which is a main town centre use. Policies DM18 and GNLP6 direct such uses to defined centres. This site does not sit within any such centre. In this case, however, only a very minor expansion to an existing established business is proposed and this is not considered to undermine the aims of local or national policy.
21. The business is well established within the area and the adaptation and expansion of existing firms is supported by Policy DM16 where consistent with the sustainable objectives of policy DM1. The proposed expansion is unlikely to significantly increase customer number but will allow for improved services to be provided to staff and customers. As such the principle of development is considered to be acceptable in accordance with policy DM1 and DM16.

Main Issue 2. Amenity

22. Key policies and NPPF paragraphs – DM2, DM11, NPPF paragraphs 8 and 127.
23. The dimensions of the rear extension and alterations to the garage as shown on the drawings match the dimensions as approved under 22/01210/F. There will therefore be no increased impact resulting from the change of use, by virtue of overlooking, overshadowing or loss of outlook to the adjoining property no. 79, than that as assessed in the previous application.
24. The reconfiguration of the existing residential floorspace to be across the ground floor only will not cause any significant impacts to the privacy and outlook of the living space for occupants of the dwelling. There will be some loss of light to the living space in comparison to that which is available through

the first floor windows as existing, however the patio doors and windows servicing the lobby will allow sufficient light into the main living/sleeping space. The existing external amenity space does not offer much quality by way of privacy or available space and the proposed alterations to the layout of the dwelling will not impact the occupants by virtue of the external amenity.

25. Concerns were raised by objection that increasing the commercial floorspace into the first floor will cause noise disturbance to the bedrooms of the neighbouring property no 79. By its nature as a hair salon the proposed use of the first floor is unlikely to cause noise disturbance that is considered to be significantly harmful to residential amenity, however, it is acknowledged that there may occasionally be more noise than would be generated by a living space regularly occupied by one or two people. To help protect the amenity of the neighbouring bedrooms it is considered reasonable to condition the first floor level to only be in use by customers between the hours of 9am-6pm Tuesday-Saturday. Other uses within Class E could cause significantly more noise than a hairdresser, so a condition should be added to restrict the use to a hairdresser in order to protect the amenity of neighbouring dwellings.
26. The addition of the condition to restrict operating hours of the first floor will also address concerns raised by letters of objection regarding loss of privacy through the front facing first floor window into the front facing windows of the opposite properties. It is common for there to be some level of overlooking between close quarters terraces such as those situated in Vincent Road, however it is acknowledged that the level of harm caused should be considered differently between the existing use as living space for a flat and the proposed use as a hairdresser. Ensuring the proposed floorspace can only be in use between the hours of 9am-6pm, when bedroom and living spaces are less likely to be in regular use is considered to reduce the potential for harm by loss of privacy to an acceptable level.

Main Issue 3. Transport

27. Key policies and NPPF paragraphs – GNLP2, DM28, DM30, DM31, NPPF paragraphs 8, 102-111.
28. The site is easily accessible on foot and benefits public transport links with bus stops within walking distance on Ketts Hill and Plumstead Road. Concerns have been raised by letters of objection regarding existing parking issues around the salon and increased parking issues from an increase in salon users resulting from the proposed change of use. As Vincent Road is not a controlled parking zone it is not fair or appropriate to denote a lack of available on-street parking for residents is solely resulting from staff and customers of the salon during assessment of the proposal. On-street parking is also available nearby on Britannia Road and at Mousehold Heath.
29. Any increase in parking demand from the proposed increase in floorspace of the salon is likely to be minimal as noted in highways comments received and the proposal is not considered to cause notable harm to existing parking arrangements or highways safety. The agent has provided a statement from the salon owner which indicates that customers are advised of the parking arrangements in the area and encouraged to use alternative methods of transport when possible. The proposed condition which would restrict opening hours of the first floor would further aid in this respect. Customers and staff

would only be using on-street parking during the day when parking needs from residents are likely to be at their lowest.

30. Overall the proposal is considered to be acceptable in terms of its transport impacts.

Main Issue 4. Nutrient Neutrality

31. Assessment of Impacts under the Conservation of Habitats & Species Regulations 2017 (as amended):

Site Affected: (a) Broads SAC/Broadland Ramsar
(b) River Wensum SAC

Potential effect: (a) Increased nitrogen and phosphorus loading
(b) Increased phosphorous loading

The application represents a 'proposal or project' under the above regulations. Before deciding whether approval can be granted, the Council as a competent authority must determine whether or not the proposal is likely, either on its own or in combination with other projects, to have any likely significant effects upon the Broads & Wensum SACs, and if so, whether or not those effects can be mitigated against.

The Council's assessment is set out below and is based on advice contained in the letter from Natural England to LPA Chief Executives and Heads of Planning dated 16th March 2022.

- (a) Broads SAC/Broadland Ramsar
- i. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
 - ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer:NO

The proposal does not:-

- Result in an increase in overnight accommodation in the catchment area of the SAC;
- By virtue of its scale, draw people into the catchment area of the SAC
- Result in additional or unusual pollution to surface water as a result of processes forming part of the proposal.

Consequently, the proposal would not result in an increase in nutrients flowing into the SAC in the form of either nitrogen or phosphorous.

Conclusion: It is not necessary to carry out an assessment under the Habitats regs.

(b) River Wensum SAC

- iii. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
- iv. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer:NO

The proposal does not:-

- Result in an increase in overnight accommodation in the catchment area of the SAC;
- By virtue of its scale, draw people into the catchment area of the SAC
- Result in additional or unusual pollution to surface water as a result of processes forming part of the proposal.

In addition, the discharge for the relevant WwTW is downstream of the SAC.

Consequently, the proposal would not result in an increase in nutrients flowing into the SAC in the form of either nitrogen or phosphorous.

Conclusion: It is not necessary to carry out an assessment under the Habitats regs.

Equalities and diversity issues

32. There are no notable equality or diversity issues.

Local finance considerations

33. Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are defined as a government grant or the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority.

34. In this case local finance considerations are/are not considered to be material to the case.

Human Rights Act 1998

35. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to approve this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

36. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this

application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to grant planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

37. The development is in accordance with the requirements of the National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

Recommendation

38. To approve application no 23/01574/F at 77A Vincent Road Norwich NR1 4HQ and grant planning permission subject to the following conditions:

1. Standard time limit;
2. In accordance with plans;
3. Development to facilitate the change of use of the first floor shall not commence until the extensions as approved under application reference 22/01219/F have been completed;
4. The first floor shall only be used by customers between the hours of 9am-6pm Tuesday-Saturday and shall not be used on Sunday and Monday;
5. Use of the first floor as a hairdressers only. No other use within Class E shall be permitted without written permission from the Local Planning Authority.

Appendices: None

Contact officer: Planner

Name: Danni Howard

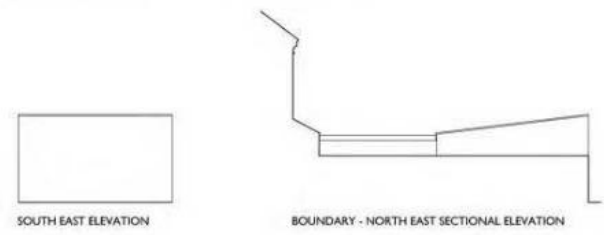
Telephone number: 01603 989423

Email address: dannihoward@norwich.gov.uk



If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Proposed Plans and Elevations 1:100



GROUND PLAN

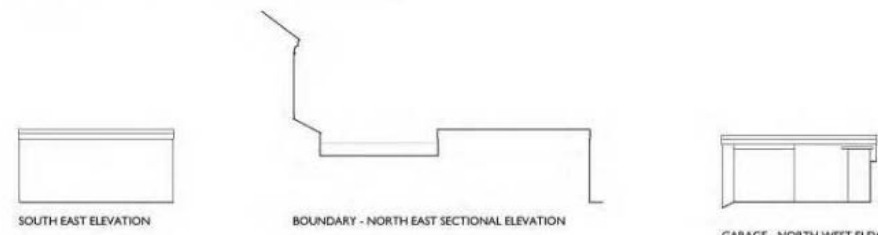


1ST FLOOR PLAN



PROPOSED SITE BLOCK PLAN 1:200 @ AI

Existing Plans and Elevations 1:100



GROUND PLAN



1ST FLOOR PLAN



PHOTO OF FRONT



SITE LOCATION PLAN 1:1250 @ AI

REV	DATE	DESCRIPTION
AD Architects 30 ROBIN HOUSE NEWCOURT ST LONDON NW8 7AD TEL 020 77229158 www.angledesign.co.uk 11 CHAIRING CROSS NORWICH NR2 6AX TEL 01603 666576 mail@angledesign.co.uk		
JOB TITLE		
77a VINCENT ROAD, NORWICH		
NR1 4HH		
CLIENT		
CHRIS BARKER		
DRAWING STAGE		
PLANNING		
DRAWING TITLE		
EXISTING & PROPOSED DRAWINGS		
SCALE DATE		
VARIES @ AI		DEC 23
DRAWING NO		
NS-4783-200		
REV		
A		





Committee name: Planning applications

Committee date: 21/03/2024

Report title: Application no 22/00762/F Land and Buildings, Including 70 – 72 Sussex Street & Land North Side of 148 Oak Street, Norwich, NR3 3DE

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

To determine:

Application no:	22/00762/F
Site Address:	Land and buildings including 70-72 Sussex Street and land north side of 148 Oak Street
Decision due by:	31/05/2024
Proposal:	Demolition of existing structures and construction of 34 low energy cohousing dwellings and ancillary shared facilities, with associated landscaping and car and cycle parking.

Key considerations:

- Loss of existing use and redevelopment with housing
- Design and heritage impacts
- Loss of tree
- Amenity of future and neighbouring occupiers
- Transport
- Energy and water efficiency
- Flood risk
- Biodiversity and green infrastructure
- Nutrient neutrality
- Contamination

- Affordable housing

Ward: Mancroft

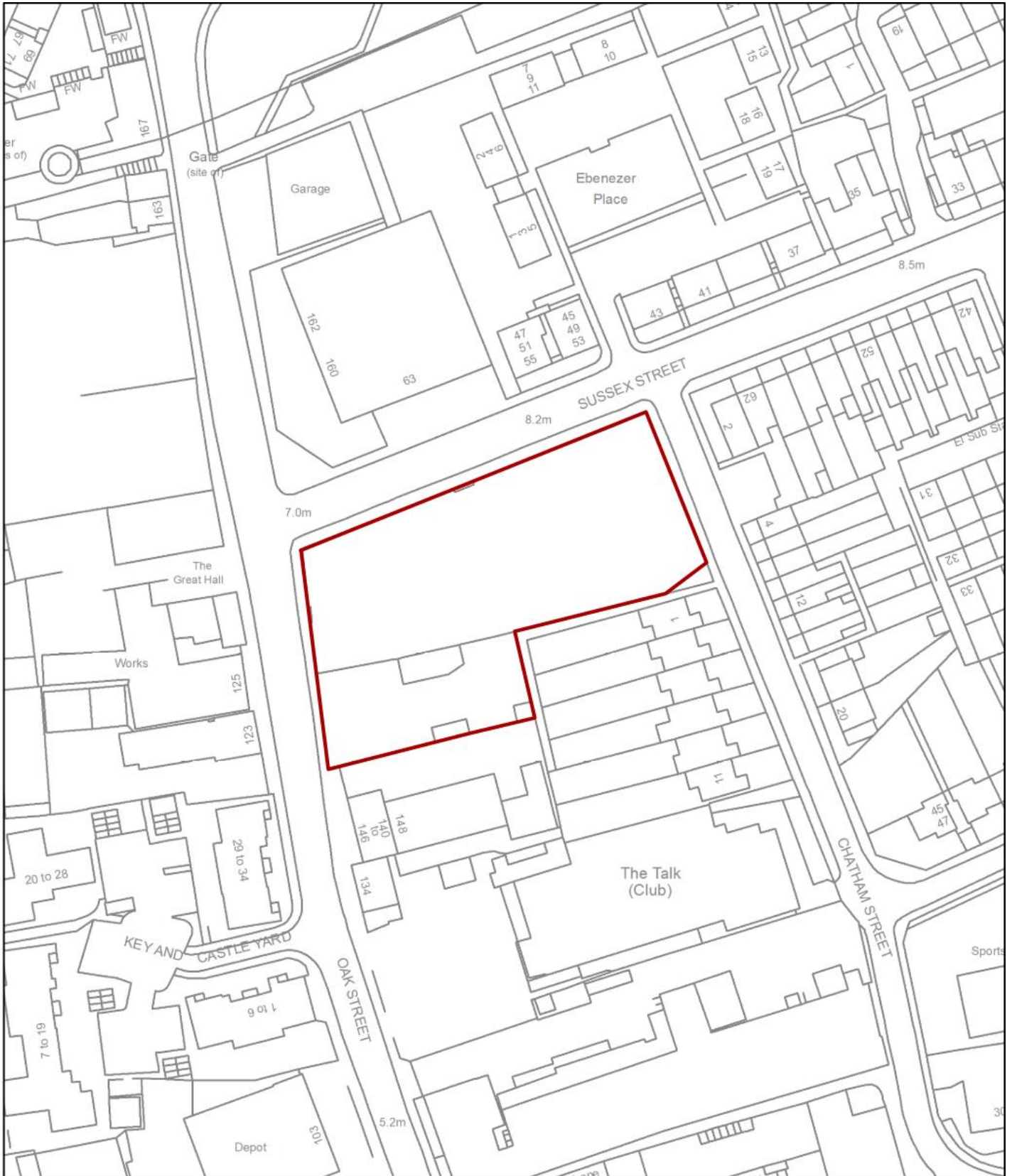
Case Officer: Maria Hammond

Applicant/agent: Sussex Street Cohousing CIC/TOWN

Reason at Committee: Objections

Recommendation:

It is recommended to approve the application for the reasons given in the report and subject to a section 106 agreement and the planning conditions set out in paragraph 370 of this report, and grant planning permission.



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Planning Application No 22/00762/F

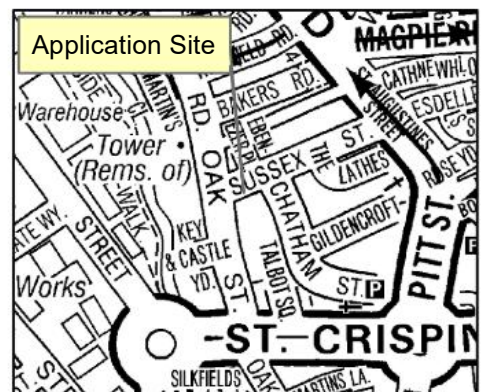
Site Address Land & buildings incl 70-72 Sussex St
& land north side of 148 Oak St

Scale 1:1,000



NORWICH
City Council

PLANNING SERVICES



The site and surroundings

1. The application site covers 0.27 hectares of land on the southern side of Sussex Street between Oak Street to the west and Chatham Street to the east. The majority of the site is cleared land which was formerly occupied by industrial buildings. These were demolished following the granting of permission for residential redevelopment in 2009 and the land has remained vacant since. A smaller area of the application site fronting Oak Street remains in use and is occupied by a fencing and building supplies business with open material storage amongst modest temporary and low quality buildings. A weeping willow tree stands at a prominent position on the Oak Street frontage in the southwestern site corner.
2. This area north of the city centre and inner ring road has a mixed character with various industrial and commercial uses along either side of Oak Street, interspersed with residential development. Immediately west of the site across Oak Street is the grade II listed Great Hall which is in residential use with a motorcycle retail shop to one side and access to vehicle and industrial uses to the other.
3. Northwest is the site of 161 Oak Street where 40 new flats and houses are currently being constructed (planning permission 18/00004/F). Heading northwards, Oak Street and the surrounding streets are predominantly residential.
4. The River Wensum and Marriotts Way footpath run parallel with Oak Street to the west and land along Bakers Road to the north, Gildencroft Park on Chatham Street and Wensum Park further north off Oak Street offer green space in the area.
5. Sussex Street and Chatham Street are predominantly residential with twentieth century flats and houses immediately northeast and south of the site and nineteenth century two and three storey terraces eastwards along Sussex Street.

Constraints

6. The site lies within the Northern Riverside character area of the City Centre Conservation Area and borders the Northern City character area to the east.
7. The Conservation Area Appraisal identifies negative vistas around the application site from Sussex Street towards Oak Street and from north of the junction to Sussex Street southwards along Oak Street past the site. The willow tree is picked out as an isolated important tree and the view further south on Oak Street towards city centre landmarks is noted to be a positive vista.
8. The site falls within the area of main archaeological interest and is directly across Oak Street from the grade II listed Great Hall.
9. The nineteenth century terraces around the corner of Chatham Street and Sussex Street directly east of the site are locally listed and all the other dwellings along the south side of Sussex Street are grade II listed, as are the majority to the north.
10. There is a low risk of surface water flooding along Oak Street.

11. The site is the subject of GNLP allocation NCC.20 for a minimum of 27 dwellings. It was previously covered by two allocations in the Site Allocations and Site Specifics Local Plan (CC18 and CC19) so has been identified for residential redevelopment since 2014

Relevant Planning History

12. The records held by the city council show the following planning history for the site.

Case no	Proposal	Decision	Date
4/1993/0822	Change of use from stone and marble masons workshop to display and hire of contractor's tools and equipment.	APCON	02/12/1993
4/1994/0250	New vehicle access and change of use from general industrial to light industrial (Class B1) and wholesale warehouse (Class B8).	APCON	24/05/1994
08/01085/C	Demolition of existing industrial units	REF	12/12/2008
08/01086/F	Demolition of existing industrial unit and redevelopment of site to provide 2x5-bed town houses, 2x4-bed town houses, 3x3-bed town houses 10x2-bed apartments, 2x1-bed apartments and 2 No. A2/A3 units. (Amended Design).	REF	12/12/2008
09/00296/F	Demolition of industrial units at the site of 70 - 72 Sussex Street and replace with a largely residential development of 9 town houses, 3 apartments and 5 duplex apartments, with 238 sqm commercial space at the junction of Sussex Street and Oak Street.	APPR	24/07/2009
09/00298/C	Demolition of existing industrial units.	APPR	04/06/2009
12/01014/D	Details of Condition 2a: Materials; 2b: Rainwater goods; 2c: External joinery; 2d: Gates to bin stores and parking areas; 2e: Canopies and porches; 2f: Boundary treatments; Condition 3: Landscaping; Condition 4: Cycle Stands; Condition 7: Heating system and Condition 8: Contamination investigation and remediation of previous permission 09/00296/F 'Demolition of industrial units at the site of 70 - 72 Sussex Street and replace with a largely	APPR	19/07/2012

Case no	Proposal	Decision	Date
	residential development of 9 town houses, 3 apartments and 5 duplex apartments, with 238 sqm commercial space (Class A2/A3) at the junction of Sussex Street and Oak Street'.		
12/01088/D	Details of Condition 2: Contract for carrying out the works of previous Conservation Area Consent 09/00298/C 'Demolition of existing industrial units'	FDO	22/08/2013
12/01089/NMA	Non-material amendment to Condition 6 of previous planning permission (App. No. 09/00296/F).	APPR	27/06/2012
16/00108/NMA	Amendment to planning permission 09/00296/F	APPR	17/02/2016
22/01544/TCA	Weeping Willow (T1): Re-pollard (removing re-growth only). Pruning points to be located on new growth, above point of attachment of pollarded branches.	NTPOS	11/01/2023

The Proposal

13. The application proposes clearing the remaining development from the site and constructing 34 new dwellings.
14. Two linked four storey blocks are proposed in an 'L' shaped arrangement wrapping around the Oak Street and Sussex Street frontages. These would provide:
- 3 no. one bed flats
 - 21 no. two beds
 - 4 no. three beds.
- Along Chatham Street there would be a terrace of six no. three bed terraced houses of two and half storeys.
15. Vehicular access to a car park would be from the southwestern corner off Oak Street and the area within the 'L' shaped plan of the larger buildings would be a communal courtyard providing external amenity space. Each terraced house would have its own private garden and access to the communal space.
16. Each ground floor flat fronting Sussex Street would have its own front door off the street and access to the upper levels would be from Sussex Street into a communal stair and lift core. This would lead to galleried access on each upper floor on the Sussex Street frontage and a shared communal access way and external amenity space to each floor along the rear of the Oak Street block.
17. On the ground floor of this building there would be a 'common house' including a kitchen, common room, storeroom and laundry, guest room and other

communal facilities for occupiers of the development. There would also be a workshop for occupiers to use within the amenity space.

18. It is intended that this would be a ‘co-housing’ development which is described in the application as: “*a form of intentional community in which people make a positive choice to live together in a neighbourly and mutually supportive way*”. It is based on five principles:

- Co-designed with residents
- A blend of private and shared spaces
- Inclusive and part of the wider community
- Designed for social interaction
- Collectively managed by residents

19. The application has been made by a community interest company of 34 members (18 active) who have informally reserved homes they wish to purchase to live in. The agents have experience with completed co-housing developments, including the award-winning Marmalade Lane in Cambridge.

20. The flat roofed four storey blocks would be constructed in brick with areas of different bonds used to add interest and the ground floor corner would have design references to an historic shop front. The Chatham Street terrace would be constructed of similar materials under an asymmetric dual-pitched roof covered in black glazed pantiles.

21. Hard and soft landscape proposals have been submitted, including four new trees within the courtyard space, climbing plants over the Oak Street block and planting in the available spaces on each frontage. Bird boxes are also incorporated, and the cycle stores and a workshop would have green roofs.

Summary of Proposal – Key facts:

22. The key facts of the proposal are summarised in the tables below:

Scale	Key Facts
Total floorspace	2989 square metres
No. of storeys	Flats: four storeys Houses: two and a half storeys
Max. dimensions	Oak Street frontage: 40 metres long, 14.7 metres high, 15.5metres at corner. Sussex Street frontage: 50 metres long, 14 metres high Chatham Street terrace: 28 metres long, 10.8 metres high

Appearance	Key Facts
Materials	Brick, flat roof, black glazed pantiles, aluminium windows and doors, timber front doors, metal balustrades, metal rainwater goods.
Energy and resource efficiency measures	Water target of 105 litres per person per day. Air source heat pumps and maximum 120 solar PV panels on flat roof. Mechanical ventilation with heat recovery. No gas proposed.

Transport Matters	Key Facts
Vehicular access	From Oak Street
No of car parking spaces	Nine, including one accessible. All with EV charging.
No of cycle parking spaces	70 spaces within stores.
Servicing arrangements	Each dwelling fronting Chatham Street would have its own dedicated bin storage within the curtilage. The flats fronting Sussex and Oak Streets would share a store with space for nine 1100l bins.

Consultation responses

23. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Representations

24. Adjacent and neighbouring properties have been notified in writing.

25. The first consultation attracted five objections and 13 representations in support citing the issues as summarised in the table below. Six of the letters of support include identical comments.

26. Four additional letters of support were received from known members of the co-housing group who are the applicants, so the comments within these letters have not been referenced within this report.

Issues raised	Response
Overpowering height, overbearing and tight to plot boundary	See main issues 2, 3 and 5
Scale: overwhelming, too tall, disproportionate, fortress like, excessively large	See main issues 2 and 3
Suggestions to revise to three storeys and/or set back top floor	See main issues 2 and 3 concerning negotiations on the scale and design. The application must be determined as submitted.
Block and reduce light and sky view	See main issue 5
Loss of views of city landmarks	See main issues 3 and 5
Loss of privacy, overlook gardens, balconies and windows	See main issue 5
Not in line with Chatham Street houses	See main issue 2
Detract from listed and locally listed buildings	See main issue 3
Four storeys sets precedent	See main issue 2
Disruption from construction, quiet residential area	See main issue 5
Not in keeping with Conservation Area, fails to blend in	See main issue 3
Great Hall will be overshadowed, dominated	See main issue 3
Loss of willow tree, should be protected	See main issue 4

Issues raised	Response
at all costs	
Lack of parking – add to existing problems. No parking permits.	See main issue 6
Environmentally friendly, focussed on ecological sustainability	See main issues 7 and 9
Reduce loneliness/isolation and increase quality of life. Foster sense of community, add to local community, strengthen community. Intergenerational, inclusive housing. Co-housing benefits residents and reduces demands on public services.	See main issues 1 and 5
Visually attractive.	See main issue 2
Disrupt way of life	See main issue 5
Support the principle, object to form	See main issue 2
Paltry number of social rent units	See main issue 12
Private use of communal spaces cause noise and disruption to all local residents	See main issue 5
Unaffordable	See main issues 1 and 12
Sensitively designed	See main issue 3
Affordable enough to encourage a mix of people	See main issues 1 and 12
Sustainable housing	See main issue 1
Increase in biodiversity	See main issue 9
Pioneering scheme for Norwich, to be proud of, positive example, innovative, first for Norfolk	Noted
Good use of space	See main issues 1 and 2
Much needed homes	See main issue 1
Reduce waste. Smaller carbon footprint than normal big developments. Lower running costs for homeowners.	See main issue 7
Greatly enhance the area. Set standard for improving area. Beauty of the scheme	See main issues 2 and 3
Attractive choice in variety of housing available. Wide mix of accommodation. Design future proofs for people to grow old actively	See main issues 1 and 2
Reinstates historic building lines, high quality frontages	See main issue 2
Minimal impact on congestion	See main issue 6

27. A re-consultation on revised proposals attracted 24 further representations. 10 objecting and 24 in support. These representations cite the following additional comments.

Issues raised	Response
Right of light consequences	See main issue 5 for assessment of light in relation to planning considerations. The right to light is a separate, legal matter.
Loss of light to Great Hall and commercial properties	<u>See main issue 5</u>
Ugly, disproportionate monstrosity, out of keeping	See main issues 2 and 3
Revisions have not changed significant issues in relation to loss of light and privacy	See main issue 5
Suggest two storeys and/or push back into site, pitched roofs	See main issues 2 and 3 concerning negotiations on the scale and design. The application must be determined as submitted.
Sad to lose tree, disregard to environment, important for climate change	See main issue 4
Unaffordable	See main issues 1 and 12
Root protection zone of garden trees accommodated for?	The Arboricultural Assessment confirm the root protection zone is not affected by the development
Increase in traffic	See main issue 6
Consideration to deliveries and parking for visitors.	See main issue 6
Effect on businesses	See main issue 5
Idea of co-housing seems flawed – directed to young, able-bodied people without children	See main issue 1
Oak Street corner could be more distinctive	See main issue 2
Transform/revive/restore derelict brownfield land	See main issues 1 and 2
Revisions have improved impacts. Revised design in keeping with older housing.	See main issue 2
Minimal car ownership	See main issue 5
Modern concept referencing traditional features	See main issue 2
Using architecture to build a community	See main issues 1, 2 and 5
Exemplar development	See main issue 1
Overall advantages greater than any disadvantage of height	See main issue 2

Statutory and non-statutory consultees

Anglian Water

28. Waste water: The foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent

and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

29. Used water: Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We therefore request a condition requiring an on-site drainage strategy.
30. Surface water disposal: The applicant has indicated on their application form that their method of surface water drainage is via SuDS. The Lead Local Flood Authority (LLFA) are a statutory consultee for all major development and should be consulted as early as possible to ensure the proposed drainage system meets with minimum operational standards and is beneficial for all concerned organisations and individuals. We promote the use of SuDS as a sustainable and natural way of controlling surface water run-off.

Citywide Services

31. I am happy with 9 x 1100l for the 28 flats. Maybe a split of 5 refuse and 4 recycling.

Design and Conservation (Norwich City Council)

Architectural treatment

32. Roofs: previously, the applicant was advised to vary the roofscape in order to integrate the blocks into their wider setting which predominately consists of pitched roofs (even the new development currently under construction on the south side of Oak Street is majority pitched roofs). Regrettably, this has not materialised in revised drawings, however, to mitigate the blockiness of the flat roofed flats, futuristic chimneys (clad in brick) will break up the roofscape. The chimneys will respect the rhythm of chimneys along Sussex Street, a feature deemed to be part of the special interest of the Conservation Area. In order for the chimneys to look convincing, it would be useful for the applicant to clarify whether the brick cladding will extend all of the way around the chimney? Due to the flat roofs, the previous recommendation for pantile roofs is no longer relevant.
33. Punched in openings: 'Punched in openings' still form part of the design of the principal elevations. The punched openings have been advised against as they compromise the architectural quality of the façade. The space created in front of the dwellings for the residents may be deemed beneficial for the circulation and the usability of the development and its retention will be at the discretion of the planning officer.
34. The dark brick plinth is a positive feature.
35. The reduction in the height of the parapet is welcomed.
36. Corner bay: The extra details to the shopfront bay including the cornice and text are really positive and have given the bay character. The shallow corner recess work wells. Other improvements to the curved corner bay could take the following form:

37. The shopfront should wrap around the whole of the bay, currently the scale of the shopfront is too small for the size of the bay- is there any reason why it is truncated?
38. The corner bay still contains a large blank wall which could be improved with façade articulation.
39. Why hasn't the brick fluting been continued around the corner bay?

Overall:

40. The development still lacks the more human scale and forms of residential building found on Sussex Street and the wider Conservation Area, as such, it is believed the scale and massing will cause less than substantial harm to the character of the Northern Riverside Conservation Area [character area] and the setting of designated heritage assets- which is regrettable. One way the level of harm could have been reduced is by lowering the building by a storey, this would have been beneficial particularly for the setting of the Grade II listed c15 Great Hall. which is likely to be dominated by the structure, however, the applicant's have expressed this would have viability issues for the scheme. Though recommendations suggested have not been fully implemented in the latest iteration of the design, the architecture is of a high design quality. The most successful stretch is along Chatham Street where a lower scale, traditional form and materials has been married to creative contemporary architecture as expressed through the roof shape and features such as the round windows. The Conservation and Design team have concerns about the impact of the four-storey scale and block mass of the proposed development on the City Centre Conservation Area and nearby designated heritage assets, as mentioned, the Great Hall is likely to be the most affected heritage asset.
41. Should the new development be approvable from a planning point of view, I would suggest conditions.

Ecology (Norwich City Council)

42. An Ecological Assessment has been submitted. This has been written by a suitably qualified Ecologist in accordance with best practice guidelines.
43. The Assessment notes that species of conservation concern are mostly scoped out, and that priority habitats are not present on site. The scheme will result in the loss of the existing on-site habitats and features. The impacts on habitats and species scoped are assessed as being of very low or negligible ecological significance. This is accepted.
44. Nesting birds: Work on the scrub should avoid the nesting bird season (of March to August) or otherwise be under a watching brief. Condition to be applied please.
45. Any detailed Landscape scheme required by Condition should incorporate the key measures listed under Enhancements and Opportunities 6.12 p12.
46. The Additional suggested measures at 6.13 are supported and should be incorporated into the scheme. Conditions for bird boxes and small mammal access to be applied please.

47. November 2023: It would be helpful to get some clarification that the baseline habitat for the BNG calculation coincides with the Environment Act date. The habitat on site seems to have changed due to scrub clearance but it is not clear what habitat was present at what time. The Env Act date (which I think is Jan 2021) is most relevant.

48. Subsequent to these comments revised calculations for biodiversity net gain have been received but no further ecology comments have been made.

Environmental Protection (Norwich City Council)

49. I would not object to this application, though I have the following comments and conditions to add:

Air Quality

50. From the Air Quality Assessment, I have no concerns regarding impact to the air quality in the area or risk to the occupants of the proposed development. I would recommend that the Good Design and Best Practice points are implemented within this development.

Contaminated Land

51. I am satisfied that a preliminary risk assessment has been carried out and the site has been risk assessed in accordance with the Government guidance.

52. The report found elevated levels of lead on the site, so a further remediation report is required. I would therefore like to add the following conditions:

- Remediation Condition
- Unknown contamination
- Imported material

53. No asbestos was found during the risk assessment investigation of the site, but I would like to add an informative note.

Construction

54. There was mention of possibly piling as part of the development, I may have missed it as I haven't been through all the plans, what sort of piling has the applicant decided to use? I would like to add a condition on Construction working hours.

Noise Report

55. If specification listed in report are used for habitable rooms then the targets can be met. A condition could be used.

56. The dwellings will be mechanically ventilated with heat recovery (MVHR) systems. I would like a condition to be added to have this information submitted:

- Requirement for installation of mechanical ventilation system for noise attenuation purposes
- Sound insulation of machinery

- Protection of dwellings fronting a road
- Anti-vibration mountings

Environment Agency

57. We have evidence which indicates that groundwater abstraction to meet current needs of the population is already in some cases causing ecological damage to Water Framework Directive designated waterbodies (including chalk streams where applicable) or there is a risk of causing deterioration in the ecology if groundwater abstraction increases. This development has the potential to increase abstraction from groundwater sources. You should consider whether the water resource needs of the proposed development alone, and in-combination with other proposed development that the relevant water company is being asked to supply, can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams. At the present time we are unable to advise with confidence that further development will not harm the water environment, until it can be shown sustainable water supplies can be provided. We are working the water companies and reviewing their draft Water Resources Management Plan to address this issue.
58. You must have regard to River Basin Management Plans and be satisfied that adequate water supply exists to serve development, in accordance with the policies of your Local Plan. Any surplus in water companies' current WRMP is subject to further consideration of whether it can be taken without causing environmental deterioration.
59. Your authority should ensure that the local Water Recycling Centre has sufficient capacity to accept foul drainage from the proposed development to ensure protection of the water environment including WFD waterbodies.
60. The location of this development is in an area of serious water stress (as identified in our report Water stressed areas - final classification). Across East Anglia we are also concerned that the rivers and groundwater <including chalk streams> are vulnerable to deterioration under Water Framework Directive, from groundwater abstraction. As a minimum, the higher standard of a maximum of 110 litres per person per day should be applied to this development as set out in the the Building Regulations &c. (Amendment) Regulations 2015. This standard is already a requirement of Policy 3 (Energy and water) of the 2014 Norwich, South Norfolk and Broadland Local Plan and can be checked by Local Planning Authorities Building Regulations teams for compliance. However, the applicant should consider if a higher standard of water efficiency could be achieved, looking at all options including rainwater harvesting and greywater systems.
61. Should the development be permitted, we would expect you to ensure that the new buildings meet the highest levels of water efficiency standards, as per the policies in the adopted local plan.

Highways (local highways authority) (Norfolk County Council)

62. There are no objections subject to suitable conditions being imposed.
63. The proposed vehicle access to the site on Oak Street is acceptable in principle.

64. The site itself is bounded on three sides by Oak Street, Sussex Street and Chatham Street. All of these streets have footways and are street lit, there are extensive waiting restrictions that form the controlled parking zone for the neighbourhood. According to local policy, new dwellings in CPZs are not entitled to on-street parking permits, and thus this is in effect a low car scheme given the provision of 9 car spaces on site.
65. Norfolk county council parking guidelines would recommend a total of 65 car spaces for the amount and type of housing provided. However given its accessible location and containment within a CPZ it is not considered there are grounds to raise an objection.
66. There is adequate turning within the site for cars and there is adequate visibility onto Oak Street from the vehicle access, the extant waiting restrictions that will protect the access will suffice and do not require further amendment. The bin store is adjacent to the site access to Oak Street and can be serviced by a refuse truck parked on Oak Street.
67. A total of 70 cycle spaces is proposed within the site, some within the gardens of the townhouses, and most within stands for residents of the flats. NCC parking guidelines cites 2 cycles per dwelling, which would equate to 68 spaces, therefore the development is compliant with policy.
68. Given that the construction process is likely to damage the footways around the site, a s278 Small Highway Works Agreement will be required to make good the footway surface to adoptable standards and reinstate any other signs, lines or street furniture affected by the works. There are extant granite kerbstones and setts on Sussex Street that should be retained where possible as these form part of the local street character.
69. The site access for the development will be via Oak Street and this will need to ensure there is a suitable vehicle access/crossover to the footway, this can be incorporated into the s278 agreement. It would be beneficial if the redundant vehicle access to Oak Street has the adjacent footway reinstated to a full height kerb for drainage purposes. It may also be helpful if tactile paving crossing points were provided either side of Sussex Street at its junction with Oak Street to facilitate pedestrian crossing associated with the residents of the development.
70. During the construction process there may need to be temporary traffic management, for example hoardings and footway diversions, these would be subject to streetworks permits. Should the parking bay on Sussex Street need to be suspended this would require a temporary TRO, again obtained from our streetworks team.
71. I am able to comment that in relation to highways issues only, that Norfolk County Council does not wish to restrict the grant of consent. Should your Authority be minded to approve the application I would be grateful for the inclusion of conditions and informative notes on any consent notice issued.

Historic England

72. We note the revisions to the scheme that we commented on in March. We have always believed that this is a large building that would have a distinct

presence within the local townscape, and would not be entirely without some visual impact in terms of the character and appearance of the conservation area and the setting of the Great Hall. Whilst it is therefore somewhat regrettable that a reduction of scale has not been forthcoming, we are willing to concede that the revisions have resulted in an overall improvement to the architectural quality of the development to some degree.

73. We therefore conclude that whilst the proposed development would be somewhat at odds with the prevailing scale of the conservation area, the degree of less than substantial harm that we previously identified would be mitigated to some extent by the improved design quality, and we would not object.
74. We therefore advise that your authority should carry out the weighing exercise pursuant to paragraph 202 Of the National Planning Policy Framework (NPPF) and that if minded to approve this planning application satisfies that the proposed development would yield public benefit that is sufficient to outweigh the harm.
75. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Historic Environment Service

76. Archaeological trial trenching took place across most, though not all, of the site in August 2012. Although on most parts of the site the results of this work were not overwhelming, as during the medieval period they were part of an area of open ground known as the Gildencroft, the Oak Street frontage is not without archaeological potential and was not fully investigated in 2012. Some further archaeological work may also be required on the Sussex Street frontage.
77. If planning permission is granted, we therefore ask that this be subject to a programme of archaeological mitigatory work in accordance with National Planning Policy Framework (2021).
78. In this case the programme of archaeological mitigatory work will commence with informative trial trenching to determine the scope and extent of any further mitigatory work that may be required (e.g. an archaeological excavation or monitoring of groundworks during construction).

Independent Living and Supported Living (Norfolk County Council)

79. The scheme is close to Norwich City centre, an established community and should be considered as a suitable location for Supported Living accommodation.
80. A scheme such as Sussex Street would support move on from enablement services, of which there is once scheme in Norwich and current tenants are always looking to move on into housing which is part of the community.

81. Norfolk County Council's Supported Living Programme has identified demand for the following types of Supported Living in Norwich. There is a high demand for housing for people with learning disabilities. The row shows how 2 units in Sussex Street could meet this demand.

District	Number of units	Cohort	Area
Norwich	4	Learning Disability and Autism	Central Norwich

82. I can confirm that there is still a need for four units in central Norwich and that this type of upper floor one bedroom unit embedded within a cohousing scheme meets our requirements and need.

Landscape

83. The principles of the Landscape strategy are accepted. Leaving some aspects of detailed landscape design to conditions would be acceptable, particularly for the more private central courtyard area.

Existing Willow tree

84. The LDSA proposes that the willow tree on site is removed for the development due to its life expectancy of 10-20 years, root environment and decay and the difficulty of incorporating it into the development scheme. Compensatory planting is proposed.

85. Although not qualified to comment on arboricultural issues, I am concerned that arboricultural reasons alone should not be used to justify removal of the tree.

86. Arboricultural techniques could equally be applied to retain and improve the health of the tree. The tree has a landscape/streetscape value which is noted in the Conservation Area Appraisal for the Northern Riverside area, and this is an important reason for the application of a TPO. This landscape value arises from the tree being a feature in the Conservation Area, and its contribution to the streetscape and the visual amenity of the locality.

87. It appears to be the only tree of such stature along a significant length (260m) of Oak Street between St Crispins Road and St Martins at Oak Wall Lane. Looking northwards along Oak Street from St Crispins (Google streetview August 2021) the tree is prominent being the tallest skyline feature. Looking southwards along Oak Street from St Martins at Oak Wall Lane junction the tree is also prominent as the tallest skyline feature.

88. Having been recently pollarded and with a potential management regime of pollarding, the tree gains value from its unusual form/shape which makes it visually interesting and noticeable. The species of weeping willow has cultural associations and relevance in this location approximately 80m from the river Wensum. People generally recognise and appreciate Weeping willows. Being a non-native species does not necessarily reduce the trees' value.

89. Management of the tree by pollarding is presented in the Arboricultural Advice Note as reducing the amenity of the tree. Pollarding is an ancient type of tree management which improves the longevity and resilience of trees. It could help to reduce the risk of branch failure, decay and splitting and is a regular management technique used on trees in council ownership.

90. When a tree is pollarded it is inevitably reduced in size. However, pollarding would occur at intervals of 10+ years during which periods the tree would grow and gradually increase in size and visibility. The overall effect of management by pollarding would be to maintain the tree and its' amenity value.
91. The other reason given for removal is the difficulty of incorporating the tree into the development scheme. Although this is not fully explained, the LDSA indicates that the applicants have explored ways in which the tree may be retained. Further clarification would be useful. In relation to Policy DM3, DM6 and DM7. The expectation would be that such a tree would be identified as requiring protection, and the development designed to accommodate it. If there were an overriding reason why this was not feasible, there are requirements for planting to compensate for landscape and biodiversity value and biomass replacement.
92. The LDSA proposes the following compensatory measures for the loss of the tree:
- Three larger specimen trees in the central garden space, two smaller trees including a smaller tree on Chatham Street, and apple trees along the south wall of the central garden space. Also, an off-site planting proposal of an 8-no. tree contribution to the 'Trees for Norwich' scheme.
 - Landscape proposals also include vertical planting (climbers), and low hedges.
93. Unfortunately, the 3 proposed specimen trees would be largely out of sight and unable to contribute to the streetscape. Although the small tree in the central space would contribute to the residents' amenity, it is also unlikely to be visible from the street. The proposed tree on Chatham Street would not have sufficient space for growth without conflict with the proposed building. A tree here would not be advisable (subsequently removed from proposal).
94. Similarly, the proposed apple trees along the southern existing wall would not make a contribution to the streetscape. Also, it seems that the condition of this wall is unassessed/questionable and would need to be resolved at this stage to determine the feasibility of this proposal. Please could further information about the wall be provided?
95. Compensatory tree planting should be provided on-site. Off-site compensatory tree planting according to the DM7 policy requires that the developer show exceptional circumstances. The contribution of 8 trees to the 'Trees for Norwich' scheme would involve an off-site location which is not identified. It is also unclear how the number has been calculated, and no biomass calculation seems to have been provided to support the proposals.
96. Overall, it is questionable whether the replacement trees would provide sufficient compensatory biomass. Or streetscape contribution to compensate for loss of the willow tree. Views into the courtyard from surrounding streets would be very limited. Tree planting within the courtyard could be glimpsed through the vehicle access archway.
97. There are no proposals for Street trees, and this is accepted given the relatively narrow widths of footways adjacent to the site, and the difficulties of implementing such trees.

Frontages

98. The principle of having climbers along the Oak Street building elevation is supported although there would not be much blank wall space to accommodate climbers. It is proposed that climbers would grow in planters rather than in the ground. This is of concern because planters are more prone to drought and would need irrigation. This could involve either an irrigation system or a maintenance regime of manual irrigation, both of which present potential risks, costs, and issues. I suggest the alternative of providing planting pits is explored. This would involve excavating existing ground and replacing with sufficient volume of good quality planting medium.
99. The species of climber proposed is Red Boston Ivy, *Parthenocissus tricuspidate*, which would negate the need for a trellis system. Instead of using this plant along the entire Oak Street elevation, it would be preferable to consider introducing other climbers, especially evergreen species.
100. The Oak Street South Elevation shows proposed climbers on the largely blank elevation. If a significant proportion of the surface area could be covered with climbers, especially evergreens, this could potentially make a contribution to the streetscape which would help to replace the loss of the existing willow tree.
101. Suggest climbing plant system to enable much of elevation to be greened. It would be helpful if such proposals could be worked up to be a little more convincing.
102. Sussex Street and Chatham Street Frontages: The narrow strip of defensible space between the back of footway and proposed building is an understandable compromise between providing future residents with privacy, whilst maximising the area for shared space in the courtyard.
103. The use of *Pyracantha* as hedging is supported. However, the height of such hedging would be limited by the window cill heights. As a result the planting would be low and not contribute significantly to the streetscape or setting of the buildings. Adequate topsoil volume would be necessary to enable growth, and details would be needed to demonstrate this is feasible in relation to the building footings and services.

Other matters

104. Daylight/Sunlight report considers mainly daylight and sunlight amenity within the residential units in the proposed development. There is little assessment of external spaces or of overshadowing of surrounding streets and gardens of existing properties. However, the courtyard garden amenity area would have good levels of sunlight and complies with the BRE guidelines on overshadowing. (Additional report subsequently provided).
105. Placing the ASHPs on the roof is supported as this would avoid issues at ground level. Could PV areas on flat roofs accommodate an integrated green roof to provide more green infrastructure?
106. The proposals shown on the hard landscape drawing would be acceptable.

Summary

107. The proposed loss of the existing Willow tree remains of concern. My feeling is that the value of the tree to the streetscape is underestimated, and that its future management by pollarding would be feasible. There is a lack of explanation of justification for removal of the tree, and proposals for compensatory planting are not demonstrated to be adequate.

108. Although unable to support the application in its current form, I hope that further information, clarification and amendments can be made to either make the compensatory planting offer more robust, or amendments can be made to the proposed layout to retain the willow tree.

Minerals and Waste (Norfolk County Council)

109. While the application site is partially underlain by a Mineral Safeguarding Area (Sand and Gravel), it is considered that as a result of the site area it would be exempt from the requirements of Policy CS16-safeguarding of the adopted Norfolk Minerals and Waste Core Strategy.

Natural England

110. No objection - subject to appropriate mitigation being secured.

111. We consider that without appropriate mitigation the application would have an adverse effect on the integrity of:

- The Broads Special Area of Conservation (SAC)
- Broadland Ramsar site
- European sites designated within the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) report.

112. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required / or the following mitigation options should be secured:

- the purchase of credits through the Norwich City Council Water Usage Retrofitting Mitigation Scheme (NCC WURMS) 78.59 x £761.83 for nitrates; and 2.95 x £21,161.84 for phosphates
- a contribution of £210.84 per dwelling (index-linked) towards the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).

Norfolk Constabulary (Architectural Liaison)

113. The application details a well laid out secure site with an access controlled primary vehicular access point and 2 x access-controlled pedestrian access points. This no through route and access control will give residents a feeling of ownership and community and will discourage anyone intent on criminal behaviour as not only are likely to be seen by residents, if access were to be gained, they have nowhere to go within the development.

114. In addition, I note the secure refuse and cycle storage, secure parking facilities and communal access points.
115. I acknowledge that the parking area is proposed to be secured with vehicle-controlled access gates, although no standards have been specified. I recommend that the standard of gates installed meets Loss Prevention Standard 1175 Issue 7 SR2.
116. I note the parking area has been designed to be 'hidden' however where communal parking areas are deemed necessary, it is strongly recommended that that they are sited close to adjacent homes, be within view of active rooms, is devoid of hiding places and the parking area well-lit to reduce the fear of crime. I note there is some surveillance offered to this area from nearby properties, however I would advise that steps are taken to alter the landscaping to maximise surveillance to this area and LED white light conforming to BS 5489-1:2020 is installed to support surveillance.

Norwich Society

117. Initial response: This is a bold and imaginative scheme and we support the proposals. A lot of thought and co-planning have gone into this scheme, and its ethos is excellent. However, we feel the Sussex Street block is too high at four storeys, and not compatible with its surroundings - Three storeys is acceptable, as in Sussex Street, or 2 ½ storey terrace on Chatham Street ideal. The previous extant plan looks more appropriate in height, although we understand it may be viability which is pushing the scheme up to the height proposed.
118. Further response subsequent to engagement with the applicants: We fully support the scheme as designed and consider that the high quality of design has resolved any concerns about the height of the proposals.

Development Strategy (Norwich City Council)

119. I can confirm that the site area and number of dwellings proposed trigger the thresholds of the Council's affordable housing policy. All developments are expected to make this provision unless an acceptable independent review of viability determines that it is not viable to provide the policy requirement.
120. It is disappointing to see that only 2 units of affordable housing are proposed. These 2 units are proposed for people with Learning Disabilities of which we are supportive. I would recommend that the applicant provides details of viability in order that we can assist with assessing if any additional affordable housing would be due.
121. All affordable housing would be required to be secured by a S106 agreement.
122. The greatest need identified in the Local Housing Needs Assessment is 1 and 2- bedroom flats and 3-bedroom houses. The council's own waiting list shows a greater need for one-bedroom flats, 2-bedroom houses and larger family homes. Therefore, it is slightly disappointing to note that there are no two-bedroom houses or 4+ bedroom house proposed.
123. All dwellings are expected to meet Nationally Described Space Standards. From the information supplied in the schedule of accommodation they would

appear to meet Nationally Described Space Standards. It is noted that in addition to the size of the self-contained units there is the shared use of the common room, shared kitchen and laundry. It is good to see that all flats comply to accessibility standards and that the common house is wheelchair accessible.

124. The development is in a convenient location to promote walking and cycling to access to the city centre where there are shops, supermarkets, places of worship, recreation and green space including the river. The provision of secure cycle storage will also help to promote cycling. The development includes parking for 9 cars and the co-living scheme encourages car sharing.
125. It is good to see that each unit has some private amenity space in addition to the shared garden. The application is on a brownfield site which is welcome, and it is good to see the inclusion of a sustainability strategy.
126. Response to viability appraisal: Having assessed the scheme I would conclude that no affordable housing would be viable to be delivered, and so the offer of 2 affordable homes representing approx. 6% should be accepted.

Strategic Planning (Norfolk County Council)

127. The following infrastructure will need to be funded through CIL:
- Education: Mitigation required at Magdalen Gates Primary School for 6 places.
 - Library Provision: Improvements to existing library facilities.
128. Norfolk Fire Services have stated that the proposed development, taking into account the location and infrastructure already in place, does not require any fire hydrants.

Tree Protection Officer (Norwich City Council)

129. Initial response: Loss of the willow tree. This is a large, vigorous specimen, the most prominent individual tree on Oak Street. Recognised as an important tree in the Norwich City Centre Conservation Area Appraisal for the Northern Riverside area. Its loss would have a significant negative impact on the amenity of the area.
130. The 'C1' categorization ('Trees of low quality with an estimated remaining life expectancy of at least 10 years'... 'unremarkable trees of very limited merit') applied to the tree seems to be an underestimation.
131. Whilst it is accepted that the tree is not free from defects, it is my view that, with appropriate management eg. re-pollarding on a regular basis, its contribution to the amenity of the area will continue for the next 20 years and beyond, (pollarded trees often living longer than is normal for the species concerned).
132. In terms of quality, the tree scores highly enough on the Tree Evaluation Method for Preservation Orders (TEMPO) to warrant serving a TPO, thus indicating the 'low quality' category applied, and 'unremarkable' descriptions are unmerited.

133. As the defects are remedial (adequately addressed by pollarding), with the tree having an estimated remaining lifespan in excess of 20 years, and, considering it has been previously pollarded, it would be more appropriate to categorize the tree as 'B1': 'Trees of moderate quality,' 'downgraded because of impaired condition (eg. Presence of significant though remedial defects, including unsympathetic past management').
134. This application would not comply with Policy DM7 and would be at odds with the National Planning Policy Framework, which recognises the importance of trees and their contribution to the character and quality of urban environments.
135. Removing the willow would harm the visual amenity of Oak Street, an amenity that cannot be adequately compensated for by planting replacements 'internal' to the site, away from the street frontage/public view.
136. Subsequent response: The removal of the willow is regrettable, and the applicant's proposal to plant 3 new larger trees and 2 smaller trees within the site, although welcome, would not mitigate its loss in terms of its value to the amenity of the street scene. But this planting, coupled with the revised proposals of a £2000 commitment to plant 8 new trees in the local area, as part of our Trees for Norwich scheme, would make a significant contribution to the city centre conservation area, and would therefore be considered acceptable mitigation.
137. I have identified 8 potential locations for new trees (Bakers Rd green space and east of Ebenezer Place), with a view, realistically, of planting during the 2024/25 planting season . If a completed Trees for Norwich application form could be included as part of condition TR12 – mitigatory replacement tree planting, then I would have no objections to the application.

Assessment of Planning Considerations

Relevant Development Plan Policies

138. Greater Norwich Local Plan (GNLP) March 2024

- GNLP1 The Growth Strategy
- GNLP2 Sustainable Communities
- GNLP3 Environmental Protection and Enhancement
- GNLP5 Homes
- GNLP7.1 Norwich Urban Area including the fringe parishes
- NCC.20 Land at 150-154 Oak Street and 70-72 Sussex Street

139. Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

- DM1 Achieving and delivering sustainable development
- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design
- DM5 Planning effectively for flood resilience
- DM6 Protecting and enhancing the natural environment
- DM7 Trees and development

- DM9 Safeguarding Norwich's heritage
- DM11 Protecting against environmental hazards
- DM12 Ensuring well-planned housing development
- DM13 Communal development and multiple occupation
- DM17 Supporting small business
- DM28 Encouraging sustainable travel
- DM29 Managing car parking demand in the city centre
- DM30 Access and highway safety
- DM31 Car parking and servicing
- DM32 Encouraging car free and low car housing
- DM33 Planning obligations and development viability

Other material considerations

140. Relevant sections of the National Planning Policy Framework December 2023 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF4 Decision-making
- NPPF5 Delivering a sufficient supply of homes
- NPPF6 Building a strong, competitive economy
- NPPF9 Promoting sustainable transport
- NPPF11 Making effective use of land
- NPPF12 Achieving well-designed places
- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF15 Conserving and enhancing the natural environment
- NPPF16 Conserving and enhancing the historic environment

141. Supplementary Planning Documents (SPD)

- Affordable housing SPD adopted March 2015
- Landscape and trees SPD adopted June 2016
- Heritage interpretation adopted Dec 2015

142. Advice Notes and Guidance

- Water efficiency advice note October 2015
- Internal space standards information note March 2015
- Accessible and adaptable dwellings standards October 2015

143. Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy – Habitats Regulations Assessment Strategy Document (GIRAM Strategy) March 2021

Case Assessment

144. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Policy Framework (NPPF), the council's standing duties, other policy documents and guidance detailed above, and any other matters referred to

specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

Main Issue 1. Principle of development

145. Key policies and NPPF paragraphs – GNLP2, 5, 7.1.4 and NCC.20, DM12, DM13, DM17, NPPF section 5 – particularly paragraphs 60, 70(b) and 128-130,

Loss of existing business

146. Policy DM17 seeks to protect small and medium sites in business use, such as the existing fencing and building supplies site that occupies part of the site. However, the site is allocated for redevelopment in the adopted local plan so the loss of this use and overriding regeneration benefits of new housing has been accepted here.

New residential development

147. The allocation for housing demonstrates the principle of the new development proposed is acceptable in accordance with Policies DM12, DM13, and NCC.20.

148. Careful consideration must be given to how the housing development can meet the other objectives of the allocation and relevant policies.

Number of dwellings and density

149. NCC.20 allocates the application site for approximately 27 homes.

150. The proposal therefore represents a higher number of dwellings and density (125 dwellings per hectare) than has been envisaged for this site. Policy DM12(e), paragraph 128 of the NPPF and GNLP2.4 advise that higher densities can be achieved in the city centre and highly accessible locations, including where there is a desire to promote regeneration and change. However, both require regard to be had to the area's prevailing character and setting.

151. In this case, the housing around the site, especially the historic terraces, is reasonably dense but the houses all enjoy private gardens and flats have access to green spaces. The area is predominantly two storey and whilst close to and reasonably well connected to the city centre, this neighbourhood outside the inner ring road is more suburban in character, rather than highly urban. The development under construction at 161 Oak Street will deliver 40 dwellings at a density of 105 dwellings per hectare representing some densification through redevelopment.

152. The scale of development to accommodate the proposed 34 units is considered further below and in negotiations on the scale of the development the applicants have advised that reducing the capacity “would have a detrimental effect on scheme viability and likely render the development unimplementable”. It is noted the number of dwellings is also derived from the demand from members of the co-housing group making the application.

153. Subject to the assessment of the impacts of the scale below, the number of dwellings proposed is not considered to be so high above the allocation or significantly out of character as to be unacceptable with regards Policy DM12(e).

Type of dwellings

154. A mix of houses and one to three bedroom flats are proposed. The Council's Development Strategy team have advised that there is most demand for one and two bedroom flats and two and three bedroom houses and are disappointed not to see two or four-plus bedroom houses included.

155. 21 of the 34 units would have two bedrooms so these would meet the current identified need and offer accommodation for families, but would be flats rather than houses. The houses are all three bedroom, as are four of the flats. A greater mix that is more responsive to current market needs would be welcomed, however the development would offer a sufficient range of dwellings to create a mixed community and is acceptable in this respect with regard to DM12(d).

156. It is also appreciated that the scheme has been designed to meet the needs of the co-housing group members and that the provision of a guest bedroom and other facilities in the common house supports the mix of smaller units.

Tenure

157. The provision of affordable housing is considered in main issue 12 below.

158. As co-housing, the units would be for sale to existing or new members of the group. As such, they would not be available on the open market in the usual terms as members would need to sign up to the group's philosophy. The matter of whether it is necessary to permit this proposal to only be occupied as co-housing is considered further below.

Co-housing and self-build housing

159. NPPF paragraph 60 advises that the needs of groups with specific housing requirements should be met and paragraph 63 identifies this includes people wishing to commission or build their own homes. In December 2023, paragraph 70 introduced support for small sites to come forward for community-led development for housing and self-build and custom-build housing.

160. 'Community-led development' is defined in the NPPF as: "*A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed and democratically controlled by its members. It may take any one of various legal forms including a community land trust, housing co-operative and community benefit society. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage or steward the homes in a manner consistent with its purpose, for example through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the specified community should be clearly*

defined and consideration given to how these benefits can be protected over time, including in the event of the organisation being wound up”.

161. As the applicants who have instigated the proposal are a community interest company whose article of association state it is not for private gain and that any surplus or assets must be used principally for the benefit of the community, this definition is met. Should it be considered that the development is only acceptable on this basis, it shall be necessary to secure that the development is only occupied as co-housing for its lifetime.
162. The applicants also assert the proposal complies with the definition of ‘self-build’: *‘persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals’*. As such, it would contribute to self-build supply and benefit from an exemption from the community infrastructure levy.
163. Some representations have queried the co-housing concept and consider it would be unaffordable and only for young, able-bodied people without children. Others support this form of housing and note benefits in terms of the mix of housing and thus occupants, fostered sense of community, reduction in loneliness, increased quality of life, reduction in waste and resource sharing and reduced demand on public services.
164. The applicants consider the benefits of co-housing also include: building a dependable support network; boosting health and well-being; living more sustainably; reducing living costs; sharing resources and responsibilities; and, building and development your own home. They cite academic research and case studies supporting these assertions. Based on a survey of the 42-home co-housing scheme at Marmalade Lane, Cambridge, they consider the proposed development would have a social value in the region of £1 million.
165. Membership of this group demonstrates that there is a demand for co-housing in Norwich and there are no existing or other proposed sites within the city to meet this need. Regard must therefore be had to the NPPF paragraph 60 requirement to meet the needs of groups with specific housing requirements and support for community led and self-build housing.
166. This proposal is for C3 housing is not distinguishable in many respects from general needs market housing and is not unacceptable in principle such. However, various aspects have been designed to facilitate the more community focussed living environment the co-housing group is seeking to achieve. The extent to which this design and the benefits of meeting a demand for co-housing determines the acceptability of the development and provides any justification for restricting the permission to this form of housing only is assessed below.

Main Issue 2. Design

167. Key policies and NPPF paragraphs – GNLP2 and 3, DM3, DM7, NPPF paragraphs 131-140 and GNLP NCC.20
168. The scheme has been designed with the involvement of 14 members of the co-housing group.
169. Allocation policy NCC.20 sets some objectives for the design:

- High quality locally distinct design of a scale and form to conserve and, if possible, enhance the location
- Secure an improvement in townscape
- Creation of strong built frontages
- Group buildings around an internal courtyard

Layout

170. Vehicular access is proposed from Oak Street, with the primary pedestrian access to the flats on Sussex Street and private and secondary accesses along Sussex and Chatham Street. The Highway Authority have no objection to the vehicular access point and layout.
171. Historic maps and photographs show that during the nineteenth century the site was occupied by a public house and mix of housing hard up to Oak Street, with a ground floor shop at the Sussex Street junction that had a canted corner bay. Angel Yard, a court of terraced housing, was developed in the southern part of the site with a passageway from Oak Street. Two houses with small front gardens fronted Sussex Street and the eastern part of the site remained open.
172. Early twentieth century slum clearances and World War II bombing resulted in the loss of many of the historic buildings on and around the site. The Great Hall is a distinct survival. By 1994, the site was clear of historic buildings and developed for the industrial use that occupied the site until demolition after 2009.
173. The proposal sets the buildings out in a 'C' shape arrangement around the three road frontages with a garden space within. Along Oak Street the building would be marginally (0.8m) set back from the backedge of the footpath by a paved area, whereas a slightly greater set back along Sussex Street would allow some space for soft landscaping between the entrances to each ground floor unit. The Chatham Street houses would have a similar arrangement and space for bin storage at the front. Maintaining these close relationships with the street frontages is considered to achieve the objective of the site allocation policy to reinstate historic building lines and have strong built frontages to each road. On Sussex Street and Chatham Street the building lines would be forward of the nearest dwellings. This maximises the open, amenity space in a courtyard arrangement to the rear and the twentieth century Chatham Street house frontages are dominated by off-street parking so this is not a desirable layout to follow.
174. Private and communal ground floor entrances along Sussex Street and Chatham Street would create active frontages to the benefit of local amenity and safety. The Oak Street frontage would have the vehicular access and large windows openings to the communal area, but there would not be any pedestrian access to the building here so it would be relatively inactive.
175. The galleried access to the upper floors on the Sussex Street elevation, where covered but open-sided corridors give access to each flat, is a design feature that has been used extensively on flatted developments in the past to varying degrees of success. These spaces which are visible within the streetscene can attract clutter and shelter for anti-social behaviour. Access control to the communal access points should manage the latter, whilst the

sense of community and shared responsibility fostered by co-housing should deter the former.

176. Arranging the buildings in a 'C' shape around the central amenity space maximises the southern aspect and thus solar gain to the rear of the dwellings and amenity spaces. Car and cycle parking and bin storage is concentrated towards the southern boundary and does not dominate.
177. The development seeks to maximise and make the most effective use of the land available. In order to facilitate the layout, it is proposed to remove the willow tree in the southwest corner of the site.
178. Policy DM7 requires trees to be retained as an integral part of the design, except where their long-term survival would be compromised by their age or physical conditions or there are exceptional and overriding benefits in accepting their loss. Furthermore, this policy only allows for the loss of trees in Conservation Areas where either removal would enhance the survival or growth of others, or it would allow for a substantially improved overall approach to the development that would outweigh the loss of the tree.
179. The applicants have explored options to retain the willow tree. They consider that the necessity to avoid the large root protection area would result in moving the vehicular access closer to the Sussex Street junction, reducing the length of this block (and thus the active frontage) and allow views into the parking area. In total four units would be lost and the ground floors uses would need to be re-located, possibly including the parking.
180. It is clear that retaining the tree would compromise the layout of the development, the extent to which the historic building line to Oak Street could be reinstated and the number of units which it could deliver. In principle none of these are insurmountable so it must be considered whether the loss of tree is outweighed by a substantially improved overall approach to the development. To do so, the arboricultural considerations and proposed mitigation are considered in section 4 below.
181. With the exception of the loss of the willow tree, the principles of the proposed layout are considered acceptable.

Scale

182. The two blocks of apartments around the Oak and Sussex Street frontages would form the bulk of the development and each would be four storeys in height.
183. Surrounding development is lower in scale, particularly the low rise, large footprint commercial and industrial buildings along Oak Street. Residential development along Sussex Street extends up to three storeys under flat and pitched roofs and there is also an historic three storey terrace at the ring road end of Oak Street. The new development under construction to the northwest rises to four storeys above the Oak Street ground level.
184. The proposed height and its relationship with heritage assets has been the subject of extensive negotiations throughout the course of the application. The height in particular initially attracted reservations from Urban Conservation and Design, Norwich Society, Historic England and in local representations. There

was some consensus between these parties that three storeys would be an appropriate maximum height and this and other suggestions to reduce the height and mass have been discussed with the applicants.

185. The applicants engaged with the Norwich Society and Historic England, as well as officers, to explore amendments to the proposal which could mitigate the impact of the four storey height. They discounted any options to remove the fourth storey as this would reduce the number of units to be provided and impact on the ability (and viability) to deliver redevelopment of the site. Setting back the top floor was also discounted due to concerns about the impact on habitability and architectural coherence.
186. Revised drawings were submitted which reduced the parapet to the flat roof, omitted a top floor canopy, introduced chimney type features to screen rooftop air source heat pumps, introduced new and altered bands of textured brickwork, increased vertical articulation, flattened the façade and introduced a new corner opening.
187. These revisions are each individually modest and do not make any substantial change to the overall four storey scale. They do, however, lighten the mass of the top storey and provide a visual break at the upper level of the two blocks. The addition of more vertical articulation, breaking up of the roof line, chimney features and alterations to brick detail all positively respond to the rhythm of the terraces along Sussex Street; an improvement to the design encouraged by Historic England and the Norwich Society
188. It is noted that a previously approved mixed use scheme on the site (09/00296/F) also had four storeys on the Oak and Sussex Street frontages and submitted drawings demonstrate that the overall height of the proposal would be marginally taller, although the bulk and mass is distributed differently between the two schemes so direct comparisons cannot be made.
189. Policy DM3(f) requires developers to demonstrate that appropriate attention has been given to the height, scale, massing and mass of new development. The original design intent was to reference the industrial buildings which historically characterised the Northern Riverside sub-area of the Conservation Area. The revisions have sought to create a more domestic character responding to the immediate residential context within the adjacent Northern City sub-area, albeit across buildings that are of a scale that reflects the larger grain historic and existing industrial and commercial development. The applicants also highlight the scale of the new development across Oak Street which the site would be seen within the context of in views north and south along the road and close to the junction on Sussex Street.
190. It is appreciated that the applicants have sought to demonstrate how the design has been informed by local references and that this has evolved in response to some collaboration with consultees. Whilst the four storey scale and substantial mass remain, the revisions are considered to have improved how this would appear within the streetscene and integrate with the residential character along Sussex Street and the wider Conservation Area. Much of the concern about the scale was about the harm this would cause to the setting of the Great Hall and character of the Conservation Area and the impact on these heritage assets in considered further below.

191. The Chatham Street houses, with two full storeys and accommodation within the roof, are of a scale that is more cohesive with the terraces and flats along Sussex Street. Within the context of the wider scheme, they serve to break up the total mass in views southwards down Sussex Street and create a transition and step down in scale as you look northwards. This is considered appropriate.
192. The ancillary workshop and cycle store buildings are considered subservient in scale and well incorporated in the overall layout.

Form

193. In form, the Oak and Sussex Street blocks have a large, unbroken footprint under flat roofs. As noted above, this is more reflective of industrial/commercial buildings. The revisions have broken the roofline to reduce the mass and add interest but amendments to provide a more characteristic pitched roof were discounted due to concerns at how the roof could accommodate renewable energy sources.
194. The bulk of the Oak Street block is softened at the road junction where the wall would be curved to reference the shops known to have existed on this road junction and remaining at the Sussex Street/St Augustines Street junction. This positive reflection of the historic character is welcomed.
195. An asymmetric roof form over the Chatham Street houses adds interest and whilst this is not a traditional dual-pitched roof, it is considered a creative contemporary interpretation of the local terraces.

Design

196. Considerable attention has been paid to incorporating locally distinct design details. At ground floor level, the curved corner would have a darker brick, cornice and fascia, signage and shallow recesses to define this as a distinct feature reminiscent of a shopfront.
197. Each ground floor flat on Sussex Street would have its own entrance set back with small hedged defensible space and the doorways would have arched heads. These are all strong references to positive characteristics and distinct rhythm of the terraces further along the same side of the road and also provide an active frontage to benefit of local amenity.
198. The upper floors have 'punched in' openings where the galleried access to the flats runs behind the façade. Negotiations did seek to remove this feature, however as considered in relation to layout above, it is not unacceptable and revisions have simplified the appearance. These openings also break up the four storey facades, complemented by texture details to the parapet, recesses and soldier courses across the brickwork.
199. Adding chimneys to the roofscape is considered to be an improvement of the revised design. The detailed design and materials of these shall need to be carefully considered to ensure they successfully conceal with air source heat pumps within and contribute to the lively and characterful roofscape that forms part of the special interest along Sussex Street.

200. The rear of the two blocks is differentiated in appearance and is dominated by the metal balconies and would have a pale grey/white brick. Courtyards and the rear of dwellings have traditionally had simpler detailing and different materials to principal facades. Whilst there would be some glimpsed views towards these courtyard elevations from outside the site on Chatham Street, it is not considered this less refined design approach would cause any detriment to the overall appearance of the development or surrounding area.

Materials

201. The proposed palette of materials, with brick dominating, is acceptable in principle in the context of the site and wider Conservation Area. It would be appropriate for the bricks to the principal elevations be red to complement the wider area, rather than the pale grey/pink suggested in the application. The quality and success of the design will be dependant on the precise finishes used and how different brick bonds and recesses are detailed so these should all be agreed by condition.

Landscape

202. The courtyard space at the centre would be largely soft landscaped providing a flowering lawn for recreation, complemented by trees within it and hedges, beds and fruit trees around the margins. Green roofs to the workshop and cycle store and a perennial planting bed along the southern boundary would soften the hard surfaced car park.

203. The street frontages would all have some degree of planting too, ranging from climbers on the very narrow Oak Street frontage and southern return and hedges to the Sussex Street and Chatham Street frontages.

204. It is considered that a balance has been struck between restoring the historic building lines and courtyard arrangement and softening and complementing the built development with new planting.

205. A fully detailed landscape scheme should be agreed by condition.

Summary

206. This scheme has evolved and seeks to strike a balance between providing 34 dwellings specifically designed for co-housing and integrating with the mixed character of its surroundings. It is considered that the revisions which made throughout the process have improved how it sits in relation to the residential context, however it remains of a substantial scale and bulk that is not characteristic. The incorporation of local references and detailing is considered to represent a high quality architectural solution and it would comply with GNLP NCC.20 by reinstating historic building lines and arranging the buildings around a central courtyard. The scale and bulk does weigh against the more favourable design aspects and would impact upon heritage assets and this is assessed below. The harm resulting from the scale must also be balanced against other considerations.

Main Issue 3. Heritage

207. Key policies and NPPF paragraphs – GNLP3 and 7.1.5, DM9, NPPF paragraphs 200-213.

208. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on the local authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law (specifically *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014]) has held that this means that considerable importance and weight must be given to the desirability of preserving the setting of listed buildings and conservation areas when carrying out the balancing exercise.
209. In its present condition, the site is detrimental to the character and appearance of the Conservation Area. Occupying a prominent position on the road junction, redevelopment offers significant potential to make a positive impact that enhances the surrounding area but must respect the sensitive historic context to do so.
210. The site is within the Northern Riverside character area of the City Centre Conservation Area which runs along each side of the river between Oak Street and Barrack Street. It is on the boundary with the Northern City character area that covers Sussex Street and eastwards to beyond Magdalen Street.
211. The Conservation Area Appraisal identifies the riverside area north of the ring road is lined by unattractive commercial yards and sites and bulky shed premises constructed of low quality materials. This includes the area along oak Street west of the application site. The Appraisal does, however, note that the area is rapidly changing with new housing developments and that whilst up to the late 1990s these were generally of standard design and 2-3 storeys in scale (e.g. Key and Castle Yard southwest of the site), more recent developments have responded better to local context with traditional detailing and 3-4 storeys in scale.
212. Consistent with NCC.20, Conservation Area Appraisal Policy B2.3 seeks to reinstate the historic building line along Oak Street.
213. In contrast to the Northern Riverside, the Northern City character area is generally characterised by streets of nineteenth century housing, including Sussex Street which is identified to have positive frontages along each side. Housing courts are noted to be an essential characteristic of historic development in Norwich and prevailed in this area until the 1930s. This included Angel Yard within the application site. There are some surviving and replicated housing court examples and carriage arches in street frontages leading to courts behind are an essential characteristic. Courtyard forms, carriage arches and front boundary walls are all features encouraged by policies of the Conservation Area Appraisal.
214. Sussex Street is highlighted in the Appraisal as one of the most interesting and earlier streets of early to mid-nineteenth century housing in central Norwich and is a good surviving example of the two and three storey terraces built in response to the growth of the city during the nineteenth century. With regards scale, Conservation Area Appraisal Policies D2.2 and D3 advise the prevailing scale of traditional buildings (i.e. two to three storeys) should be respected, whilst encouraging larger scale buildings in appropriate locations where they do not negatively impact on important views of landmarks or the setting of listed buildings. Large scale redevelopment should demonstrate how

they reinstate a lost context or urban grain. Views of the City Hall clock tower from Oak Street and Castle from Chatham Street are picked out in the Appraisal as positive views.

215. Red brick is the prevailing material across Northern City housing and brickwork detailing, window and door head details are identified as positive features characteristic of this area.
216. It is clear from the Appraisal that the site sits at a junction between two distinct character areas and there is a balance to be struck with how the scheme can positively respond to this historic context and enhance the Conservation Area as a whole.
217. The design of the scheme has sought to have regard to the mixed context of the site and deliberately reflect both industrial and residential typologies. Revisions have increased the degree to which it reflects positive features of the domestic architecture along Sussex Street but the scale remains more industrial, albeit far higher than any existing surrounding development and more akin to lost or less immediate historic buildings. The applicants consider that this is a contextual design for this anchor corner site and that it is self-confident in its expression.
218. The original submission, particularly with regards the four storey scale, attracted concern and objection about how this responded to the Conservation Area and the impact on listed buildings, especially the Great Hall. Consultees agree that the revisions to the detailed design which have strengthened the reflection of positive features along Sussex Street are improvements and that there is an architectural quality to the design which weigh in its favour.
219. As well as the materials and brickwork details referencing identified characteristics of the Sussex Street housing, the layout with the buildings reinstating historic building lines and arranged around a central courtyard space which could be glimpsed through the street entrances positively draws on the historic pattern of building in this part of the city. In these respects, it achieves the aims of the site allocation and Conservation Area Appraisal policies.
220. The canted shopfront bay, subject to the detailed design to be agreed by condition, would be a welcome historic reference that would be further enhanced by signage displaying 'Angel Yard'; the name of the former yard within the site that has been adopted by the applicants for the development. Some interpretation to explain this should be incorporated and can be agreed by condition.
221. Despite improvements to the detailed design and acknowledgement of some beneficial features in the scheme, the scale, footprint and mass of the four storey blocks in relation to the surrounding heritage assets continues to be of concern. Policy NCC.20 does not make any recommendations concerning height other than requiring redevelopment of the site is of a scale which conserves and, where opportunities arise, enhances its location within the City Centre Conservation Area and nearby listed buildings. The Conservation Area Appraisal for both character areas identify that new development is often of a larger scale but that this must be considered, contextual and protect heritage assets from harm.

222. The proposed scale is considered incongruous with the more 'human scale' of surrounding terraced housing and lower height (but low quality) commercial buildings in the Conservation Area. In terms of listed buildings, the greatest impact would be on the setting of the Great Hall sited directly west across Oak Street and this requires careful attention.
223. This grade II listed fifteenth century trading hall is now in use as a dwelling. It is a traditional flint and red brick gabled building of two storeys with a pitched roof. Historic England recognise it to be rare survival of its era in this heavily modified area and is prominent amongst the relatively low-level surrounding development. As existing, the site makes no positive contribution to its setting. However, it is considered that the four storey building directly opposite it which would be seen in views north and south along Oak Street has the potential to dominate and overpower it to the detriment of its setting. The contrast in scale between the two buildings would be somewhat exacerbated by the relatively open surroundings of the Great Hall and ground levels which drop away towards the river.
224. Attempts to negotiate a reduction in scale and alteration to the form to mitigate this impact have achieved improvements to the detailed design but no amendment to the scale and form. Historic England advise this is regrettable but concede the revisions result in an overall improvement to the architectural quality that mitigates the harmful scale to some degree. More widely, they consider the development would have a distinct presence within the local townscape.
225. Harm to the locally and statutorily listed dwellings along Sussex Street is mitigated to some degree by the less direct relationship and it is considered that positive views towards city centre landmark buildings would be maintained along Oak Street and Chatham Street.
226. The loss of the willow, which is the only street fronting tree in the immediate vicinity of the site, is also considered to cause harm to the character and appearance of the Conservation Area. The proposed replacement planting, discussed below, would have some benefit to the wider Conservation Area that goes some way to mitigating this.
227. It is considered that the development, mostly by virtue of its scale and mass, would result in harm to the setting of the Great Hall, setting of locally and statutorily listed buildings along Sussex Street and both the Northern Riverside and Northern City Conservation Areas. This harm is assessed to be 'less than substantial' which, in accordance with paragraph 208 of the NPPF, must be balanced against the public benefits of the scheme.
228. The public benefits are considered to include: delivering the site allocation; contributing 34 dwellings to local housing supply; remediating and regenerating this long-term vacant and detrimental site; and, potential to stimulate and inspire further regeneration. As co-housing, the scheme would meet an identified local demand that is otherwise unmet.
229. On balance and with considerable weight given to the desirability of preserving the setting of listed buildings and the character and appearance of the Conservation Area, it is considered that the public benefits do weigh in favour of this development and the harm to heritage assets, whilst regrettable, is not unacceptable. Design details, materials and heritage interpretation shall

need to be agreed by condition to ensure that the high architectural quality is achieved and the scheme can set a benchmark for future development.

230. The majority of the site has been subject to past archaeological investigation, and it shall be necessary to ensure by condition that the additional area is also investigated.

Main Issue 4. Trees

231. Key policies and NPPF paragraphs – GNLP3, DM7, NPPF paragraphs 180 and 186.

232. As considered above, the willow tree is proposed to be felled to facilitate the layout of the development. This is the only existing tree within the application site and currently benefits from a degree of protection by virtue of its location within the Conservation Area.

233. A Tree Survey dated July 2021 recorded this as a mature weeping willow with a sizeable wound, some visible early decay and cavities. It was assessed to have a 10–20-year life expectancy and overall category C1 quality and value grade: a low retention priority that can generally be considered for removal to facilitate development.

234. Several level changes in the root protection are said to make it difficult to integrate this area into the development without detriment to the tree. This Survey recommended removal to facilitate the proposal.

235. Subsequently, an Arboricultural Supplementary Advice document was prepared which included findings of further investigations of the decay and condition. This reiterated that the remaining life expectancy if retained in its existing context, or within the proposed development, was at most 20 years. There was said to be a risk of branch failure but this could be remediated through cyclical pollarding. It noted that this would reduce the height and crown size and therefore the prominence in the streetscape.

236. The Tree Protection Officer considered the willow to be a large, vigorous specimen and noted it was the most prominent individual tree on Oak Street. This is reinforced by the Conservation Area Appraisal which identifies it as an important tree. The Landscape Officer also notes the contribution this tree makes to the streetscape and visual amenity of the area, particularly as it is the only tree of such stature along a significant length (260m) of Oak Street and forming the tallest skyline feature in views north and south along the road. It is also considered to have value by virtue of its unusual form/shape and the cultural associations of weeping willows with the river.

237. Although the defects were noted, the Tree Protection Officer considered the C1 categorisation an underestimation and B1 to be more appropriate. The tree was assessed to be of sufficient quality to warrant a tree preservation order (although one has not been served).

238. The Tree Protection Officer considered the proposed removal would harm the visual amenity Oak Street and this could not be compensated by replacement planting within the site where it would not make the same contribution to the street frontage and public views. Representations have also objected to the loss of the tree.

239. In December 2022, a works to trees in a Conservation Area application for re-pollarding to remove regrowth was submitted to the Council. This was considered to represent good arboricultural management and the approved works were completed in March 2023.
240. The application asserts that regular re-pollarding would be required for good management of the tree and that this would continuously reduce the size and its amenity value. As set out in paragraph 169 above, options to retain the tree were explored but the applicants believe they can best deliver sustainable development by removing the tree and delivering the proposed layout.
241. By way of compensation, the landscape scheme proposes three specimen trees, one smaller tree (reduced from two as one was not considered viable) and espalier) apple trees (trained flat against a wall). In addition, climbing plants are proposed on the south elevation of the Oak Street block (which is in a similar position to the existing tree) and Oak Street frontage. The applicants propose to incorporate the biomass of the felled tree into the landscape by creating garden furniture and landscaping for play. Furthermore, a financial contribution to the Council for eight street trees is proposed.
242. The Tree Protection Officer remains of the opinion that loss of the willow tree would be regrettable and that the proposal for planting within the site would not mitigate its loss with regards amenity value in the street scene. The Landscape Officer is not convinced by the difficulty to incorporate the tree into the scheme and agrees the on-site trees would not make a contribution to the streetscape.
243. With regards the DM7 requirement for replacement trees to have at least equivalent biomass to those lost in exceptional circumstances, the applicants' ecologist estimates the biomass of the existing to be 1524kg and for 10 silver birch (a proxy for four new on-site and eight off-site trees) to be 1608kg after 20 years. Although these figures have not been verified and the species of off-site trees has not been determined, they suggest the combination of on- and off-site replacement trees would be adequate in this respect. Furthermore, the willow has a low ecological value, and a range of new species can offer greater interest with blossom for pollinators.
244. The Tree Officer is satisfied that the combination of on-site planting complemented with eight new trees locally could make a significant contribution to the Conservation Area. Regrettably the footpath widths are such there is no scope for new street trees within the footway. However, they have drawn up a scheme for planting within the green space at Ebenezer Place (the flats immediately north of the site) and between Bakers Road and St Martins at Oak Wall Lane. The latter in particular would contribute to greening within the Conservation Area by reinforcing existing green space along the course of the city wall. The applicants are willing to make a financial contribution to cover the cost of the Council planting eight heavy standard trees and 30 years of maintenance costs.
245. Whilst it is not considered there is an overwhelming case demonstrating the loss of the tree is necessary to allow for an improved overall approach to the design of the development and that the benefits of the proposed design and layout outweighs the loss of the tree, the applicants wish for the application to be determined as proposed. It is considered that the quality, longevity and landscape/streetscape value has been underestimated in the application and it

is regrettable that negotiations seeking to retain the tree as an integral part of the scheme have been unsuccessful.

246. However, through a combination of on- and off-site planting it is considered that the biomass and biodiversity value could be compensated for, if not enhanced. The off-site tree planting would not be immediately visible in the context of the site and therefore would not make the same contribution to the visual amenity of Oak Street and positive vista towards the city centre. Climbing plants over the Oak Street elevations would offer some greening to the development to mitigate this impact and the wider Conservation Area would benefit from the additional tree planting.

247. On balance, subject to securing details, implementation and management of the on-site planting and a financial contribution to cover the full cost of off-site planting, it is considered the loss of the willow tree can be adequately mitigated and the proposal complies with the objectives of Policy DM7 and GNLP3.

Main Issue 5. Amenity

248. Key policies and NPPF paragraphs – GNLP 2.6 and 5, DM2, DM11, NPPF paragraphs 8 and 135.

Future occupiers

249. All units would achieve minimum internal space standards. To comply with Policy DM2 habitable rooms must also receive adequate natural light and outlook.

250. The flats would all be dual-aspect so receive light from different directions throughout the day and have two different aspects for outlook. The Sussex Street block would have a north facing elevation and the light to the windows here would be further reduced by the galleried access to front doors on upper levels. On the south facing elevation, the window and door openings would also be overshadowed by the balconies above, however this would provide some shading to mitigate overheating.

251. A Daylight and Sunlight Assessment has found that bedrooms (and studys) in all but one of these flats would not comply with the Building Research Establishment (BRE) guidelines for sunlight exposure (space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1 February and 21 March with cloudless conditions), but that as at least one habitable room would, each flat is acceptable in this respect overall. Some units also have one bedroom well below the 100 lux standard for daylight illuminance.

252. The Oak Street block would also have galleried access and balconies overshadowing the windows and door openings on the east and west elevations, but only one bedroom would fail the guidelines for sunlight exposure. The living/dining/kitchens in three units would have daylight illuminance below a 150 lux target which has already been reduced from 200 lux for kitchens to take account of the principal use as living rooms.

253. Whilst the balconies to the two blocks provide some benefit in terms of managing over-heating, it must be acknowledged that they compromise the light to the dwellings.

254. Proposed houses on Chatham Street would also benefit from dual-aspect living/dining/kitchen rooms and bedrooms, however one mid-terrace unit would experience daylight illuminance below standards in the living/dining/kitchen and some individual rooms would also fail to comply with sunlight exposure guidelines. Overall, each unit would achieve compliance.
255. BRE guidelines are only guidance and can be interpreted flexibly, including in more urban and higher rise locations. In this case, it is noted that the daylight illuminance and sunlight exposure to some rooms, mostly bedrooms, is compromised but it is considered that overall each unit would have access to adequate natural light and provide an acceptable standard of amenity in this respect.
256. The eastern end of the Sussex Street block would be within 4.7 metres of the rear elevation of the three closest proposed houses on Chatham Street. This is close relationship and on the first floor there would be a study window and bedroom facing each so neither would benefit from a high degree of privacy. Each of these rooms would also have windows on the Sussex Street elevation without such close overlooking. The ground level gardens and second floor terraces would also be overlooked by upper floor windows in the east end of the Sussex Street block.
257. In negotiations with the applicants, they have reinforced the point that the blend of private and shared spaces designed for social interaction are key principles of co-housing and that those opting into this lifestyle would be seeking such close relationships with neighbours.
258. In accordance with GNLP5, it is necessary to condition that at least 20% of the dwellings provide accessible and adaptable homes in accordance with Building Regulation M4(2)[1] standard.

External balconies and communal area

259. All but one flat on each floor of the Oak Street block would have access to a private balcony and the Chatham Street houses each have a modest private garden and second floor terrace. The other flats would all have access to balcony/access areas which would not be divided between units. This is a particular feature of the co-housing concept to nurture the sense of sharing and community between occupiers, rather than each household living in isolation to each other. There would a lower level of privacy to external spaces and more potential for views into living spaces from external accesses than would be expected in other residential developments.
260. The gardens to the Chatham Street houses are constrained in area and those closest to the flats would have a sense of enclosure from the proximity to this four storey building. Occupiers would also have access to the more open communal garden through rear gates to each property and each house would have a second floor terrace. In the interests of retaining as much private garden space as possible, it is considered necessary and reasonable to remove permitted development rights for curtilage structures and extensions to these houses.
261. As occupiers of co-housing would be buying into the overall concept of living together more communally, the constrained size and privacy of balconies of gardens and the number and mix of people using the communal garden may

be more accepted than in general market housing. This location also has good access to other green and open spaces, including the area along Bakers Road, Gildencroft park with playground and Wensum Park.

262. Overall it is considered that each individual unit would provide a high standard of living for future occupiers from internal and external spaces. This would be complemented by the common room and other communal facilities. Whilst these have been specifically design to facilitate the lifestyle of co-housing occupiers, in principle they could equally be used for facilities to enhance the living conditions of any occupier.

Noise

263. A Noise Assessment found that existing background noise would pose a low to high risk of adverse noise effects on occupiers in different parts of the site. In order to mitigate this, glazing specifications are recommended to reduce the internal noise and ventilation shall be necessary where open windows would cause significant adverse effects. Implementation of the required glazing specification and full details of the ventilation should be secured by conditions.

264. Balconies overlooking Oak Street would experience noise above the guideline level for external amenity and the design has mitigated this as far as possible. Given that occupiers would also have communal balcony space outside their homes on the rear elevation and use of the communal garden area which would not suffer such high noise levels, this is not unacceptable.

265. The noise impacts of the air source heat pumps and any other plant on future and neighbouring occupiers shall have to be considered in a detailed specification to be agreed by condition.

Neighbouring occupiers – loss of light and overshadowing

266. An assessment of daylight and sunlight to neighbouring properties as a result of the proposal has also been made.

267. The analysis finds that 2 Chatham Street (on the corner with Sussex Street) would experience a reduction in daylight to the living room and dining room to just below the BRE target of 27% vertical sky component (a measure of the direct skylight reaching a point from an overcast sky) and the living room would have a negligible loss of no sky line (a measure of the distribution of daylight within a room). Overall, it would retain very good sunlight levels.

268. The Georgian terrace at 4, 6 and 8 Chatham Street and twentieth century dwelling at number 5 to the south of the site would experience minimal loss of daylight and remain above the BRE targets.

269. The six flats across Sussex Street have windows and balconies facing south and thus towards the site. The face of this building would experience a reduction in daylight but only to the extent that one window would fall below the vertical skyline 27% target (to 25.5%). There would also be a high proportional loss to the windows recessed under the balconies of up to 64%. The no skyline impact is assessed to be minimal and retained sunlight levels would be very good.

270. Any impact to the dwelling within the Great Hall is also assessed to be minimal and the closest residential gardens (other than balconies to flats) would not be unacceptably affected. It is noted the commercial properties across Oak Street would experience some loss of light and overshadowing, however not to the extent that the viability of the businesses or working conditions of occupiers could be considered to be unacceptably compromised.
271. The assessment acknowledges that neighbouring dwellings would experience a reduction in light to some rooms as a result of the up to four storey development on this site with neighbours in all directions. They consider that this is somewhat inevitable for any viable scheme on this largely undeveloped site and that the retained daylight levels are 'sufficient' for an urban location.
272. The loss of daylight to some neighbouring windows is regrettable. Those most affected are the windows recessed under balconies to the flats opposite where the amenity of the internal rooms and external space on the balconies would be adversely impacted by the development. It is noted the flats also have access to green space to the rear.
273. As the applicants' assessment notes, some impact is to be expected from any development on this vacant site immediately south of the flats and in close proximity to other dwellings. A balanced view must be taken with regard to the scale of these impacts, the allocation of the site for redevelopment and the location close to the city centre.

Neighbouring occupiers – loss of privacy

274. The windows on the Sussex Street elevation towards the eastern end of the site would face towards the flats 16 metres across the road at Ebenezer Place. This is a similar distance to the existing dwellings along the road.
275. The balconies and windows to these flats face the road so do not benefit from a high degree of privacy currently. Whilst the development would reduce their privacy, including from higher level windows looking down, it is not considered this would be to an extent which is unacceptable for a flatted development in this reasonably dense area of the city.
276. On Chatham Street there would be approximately 12.5 metres to the existing dwellings on the eastern side of the road. Off-street parking occupies part of the space across the road, so only two dwellings would be directly affected and this front-to-front relationship is not unacceptable for terraces in this part of the city.
277. The closest existing terraced dwellings immediately south of the site on Chatham Street would also experience some additional overlooking from upper floor windows, balconies and terraces. The distances, angles and existing views from first floor windows along the terrace are considered to mitigate any unacceptable harm to amenity.
278. It is not considered the dwelling within the Great Hall would suffer any loss of privacy or unacceptable overlooking.

Neighbouring occupiers – noise and disruption

279. Representations have raised concern about harm to amenity arising from noise and disruption from the occupation of the development. It is appreciated that there would be an intensification of activity on the site compared to its largely vacant condition in recent years. However, a residential use is likely to be less disruptive and noisy than the past industrial/commercial use and it is not considered the development would be so dense or intensively occupied that it would be harmful to residential amenity. Nor is it considered that the residential development would be disruptive to neighbouring commercial uses.
280. Noise, disruption, traffic and parking during the construction period could be harmful to residential amenity, so it is considered necessary to agree a construction management plan (including traffic and parking) by condition.

Summary

281. The design of this scheme by the co-housing group has sought to create a development which could be lived in as a community with a high degree of social interaction between residents. As such, occupiers would not benefit from the degree of privacy in internal and external spaces that other private occupiers would expect and there would be a close relationship between the buildings which impinges on the amenity of some dwellings and garden space.
282. These factors weigh against the acceptability of the scheme in amenity terms, but could be mitigated by ensuring the development is only occupied as co-housing so that future occupiers would be opting into this particular way of living and would benefit, rather than suffer, from the close relationships and lower privacy.
283. Neighbouring occupiers would experience some reduction in the standard of amenity they currently enjoy by overlooking a vacant site. Redevelopment is considered to inevitably impact this to some degree and the proposal would create a proximity to other dwellings, levels of light and degrees of privacy which are not unacceptable for a reasonably dense area close to the city centre. The harm to amenity must also be considered in the context of other harm and benefits of the scheme in the overall planning balance.
284. It is therefore considered that, on balance, subject to ensuring the development is occupied as co-housing over its lifetime, the proposal is acceptable in respect of the standard of amenity and living conditions for future and neighbouring occupiers.

Main Issue 6. Transport

285. Key policies and NPPF paragraphs – GNLP 2.1, DM28, DM30, DM31, NPPF paragraphs 8, 114-117.
286. Objections have raised concerns about an increase in traffic and impacts from deliveries, visitors and resident parking.
287. The Highway Authority have no objection to the proposal and it is not considered that the development would generate any significant additional traffic, especially compared to the past industrial/commercial uses. They are also satisfied with the access arrangements, subject to agreeing details for

works to the highway through a s278 small highway works agreement. The details of these works must be agreed prior to commencement and they must be completed prior to occupation.

288. A total of nine car parking spaces are proposed. Policy DM32 does allow for car free housing in this location or a maximum of one space per dwelling. The co-housing group intend to promote car sharing as part of their more community focussed living. This would facilitate efficient use and management of the nine spaces, and could be managed with a parking plan for allocation and enforcement of use of spaces agreed by condition.
289. The sustainable location for transport options close to the city centre and proposal for reduced parking complies with the objectives of GNLP2.1 and EV charging with 2.2.
290. Residents would not be eligible for on-street parking permits, so would not contribute to any existing parking congestion in the area. Along the Sussex Street frontage and elsewhere around the site there are two hour visitor spaces which should enable deliveries, visitors, *etc.* to park off-site without detriment to existing residents.
291. Each ground floor Sussex Street flat and terraced house on Chatham Street would have a cycle store at the rear garden and the communal space for the flats would have an enclosed store for 36 cycles and a further 14 spaces in Sheffield stands. This level of provision exceeds the minimum standards and is welcomed to support sustainable travel and complement the low car parking provision.
292. A bin store with sufficient capacity for the flats would be within the gated communal space and arrangements for managing collection should be agreed by condition. The Chatham Street houses would each have space for bin storage and access to the highway to leave them for collection.

Main Issue 7. Energy and water efficiency

293. Key policies and NPPF paragraphs – GNLP 2.9 and 2.10, DM1, NPPF paragraphs 8, 157.
294. A low energy approach has been taken to the design of this development and the applicants are keen to obtain Passivhaus Classic certification. It would have high levels of insulation and passive approaches to reduce overheating. Mechanical ventilation with heat recovery would also reduce the heat loads and a combination of air source heat pumps and solar panels are proposed. Co-housing with more shared resources could facilitate a community microgrid to maximise utilisation of the generated energy on site and reduce the amount exported to the grid.
295. An Energy Statement proposes that the air source heat pumps could reduce the energy requirements by approximately 25% for the heating and the solar panels by 44%. This high level of renewable/low carbon energy provision is welcomed in accordance with GNLP2.10 and the environmental sustainability objectives of the NPPF. Full details of the renewable energy equipment to achieve this should be agreed by condition.

296. With regards water, the Environment Agency have advised the development has the potential to increase abstraction from groundwater sources and that this practice can damage waterbodies designated under the Water Framework Directive and deteriorate ecological interest. They recommend the LPA considers whether the water resource needs of the development in isolation and in combination with other proposed development can be supplied sustainably without such adverse impacts.
297. As part of the GNLP process a Water Cycle Study (WCS) has been undertaken. This study has considered planned future growth and assessed water supply capacity, wastewater capacity and associated environmental capacity. In relation to water supply, the WCS states that the latest Anglian Water 'Water Resource Management Plan' indicates that through the introduction of strategic demand management options and supply side schemes adequate water supplies up to 2045 can be achieved and will cater for the proposed levels of growth in Greater Norwich.
298. In order to manage water demand, the Environment Agency recommend a 110 litres per person per day standard is applied. This is required by GNLP 2.9 so can be secured by condition. They also encourage the applicant to consider the use of rainwater harvesting and greywater systems to achieve higher efficiency and it is noted the application proposes 105 litres per person per day. This additional efficiency is welcomed but only the adopted policy requirement can reasonably be secured by condition.
299. The Environment Agency have also advised the LPA should ensure that the local Water Recycling Centre has sufficient capacity to accept foul drainage from the proposed development. Anglian Water have confirmed they are obligated to
300. The waste water drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to take the necessary steps to ensure that has Centre has sufficient treatment capacity so the needs of the development will be met.

Main Issue 8. Flood risk

301. Key policies and NPPF paragraphs – GNLP 2.8, DM5, NPPF paragraphs 165-175.
302. There is no flood risk to the site itself but a low risk surface water flow path runs along Oak Street.
303. Surface water is proposed to drain to a soakaway and the detailed design of this should be agreed by condition.
304. Anglian Water have also advised that a detailed on-site foul drainage strategy for used water shall need to be conditioned to ensure the development does not add to the risk of existing infrastructure flooding downstream.

Main Issue 9. Biodiversity and Green Infrastructure

305. Key policies and NPPF paragraphs – GNLP 2.3 and 3, NPPF paragraph 8, 180, 186-188, GIRAM Strategy

306. An Ecological Assessment has found that the existing on-site habitats and features to be lost are of very low or negligible ecological significance. This includes the willow tree which, by virtue of its non-native species, lack of interest features for other species and absence of blossom for pollinators, is assessed to have very low ecological value.
307. The site is within 80 metres of the Train Wood County Wildlife Site and the existing intervening development is considered to mitigate any direct impacts.
308. The Assessment recommends that work avoids the nesting bird season or is otherwise under a watching brief and it is considered necessary to secure this by condition.
309. To enhance biodiversity, the assessment recommends providing a flowering lawn, trees that provide blossom, a range of ornamental and shrub planting, green roofs, swift boxes and house sparrow boxes. Hedgehog access in new boundary treatments is also proposed. Green roofs to the workshop and cycle stores are proposed but were not considered feasible for the main buildings.
310. A submitted landscape plan incorporates this planting into the scheme and the full details of all new planting, implementation, management, bird boxes and hedgehog gaps should be secured by condition.
311. This Ecological Assessment also incorporates an evaluation of biodiversity net gain. Since the first submission this has been updated to address queries and reflect evolving guidance on how to quantify biodiversity value.
312. As the application was submitted before 12th February 2024, it is exempt from the statutory requirements for at least 10% biodiversity net gain. Furthermore, whilst GNLP3 requires it to be demonstrated that the gain to biodiversity is a significant enhancement (of at least 10%), Planning Practice Guidance advises decision makers should not give weight to local policies requirements on development which are exempt under the statutory framework. There is, therefore, no statutory or development plan basis by which a net gain of at least 10% can be insisted upon or secured on this development. Policy DM6 and NPPF paragraph 180(d) which seek to ensure development contributes to a (unquantified) net gain in biodiversity continue to attract full weight.
313. Following some negotiation over the correct baseline to be used and the value to be attributed to new planting, the assessment does suggest that the development would deliver a net gain of 11.86%. Agreeing the full details of the landscaping and subsequent management by condition shall be necessary to ensure the development delivers net gain in compliance with DM6, NPPF 180(d) and the overall objectives of GNLP3 to enhance the natural environment.
314. GNLP3 also requires all residential development to address the potential visitor pressure on sites protected under the Habitats Regulations (in accordance with the GIRAM Strategy). It is necessary for payments of the recreational assess mitigation tariff and a contribution to enhanced off-site green infrastructure to be secured on the development to comply with this policy and strategy. This is considered further in relation to the Habitats Regulations Assessment below.

Main Issue 10. Nutrient Neutrality

315. Key policies and NPPF paragraphs – GNLP3
316. As assessed below in relation to the Habitats Regulations Assessment, payment for credits from the Council's Water Usage Retrofitting Mitigation Scheme can secure nutrient neutrality for the development.

Main Issue 11. Contamination

317. Key policies and NPPF paragraphs – GNLP 2.7, DM11, NPPF paragraphs 189-191.
318. A report on initial ground investigations identifies there are elevated concentrations of lead and zinc. A detailed remediation strategy shall need to be agreed by condition to ensure the site is made safe for future occupiers. The report also assesses the ground conditions and suitability of different foundation options, this will be subject to subsequent technical design. If the foundations are to be piled, the construction management plan should take account of the noise impacts.
319. An air quality assessment finds that future residents would experience acceptable air quality and the development would not introduce any new significant sources of emissions. Therefore, no mitigation measures are required.

Main Issue 12. Affordable housing

320. Key policies and NPPF paragraphs – GNLP5, DM33, NPPF paragraphs 60, 64-66
321. In accordance with GNLP5, this development of 34 dwellings should include at least 28% affordable units (10).
322. In accordance with NPPF paragraph 66, developments like this which are proposed by people who wish to build or commission their own homes are exempt from the requirements to provide 10% of the total dwellings for affordable home ownership.
323. A viability report has been submitted and considered by officers prior to the adoption of the GNLP and under the previous Joint Core Strategy requirement for 33%. This sets out that co-housing dwellings attract a price premium and justifies the values used in the assessment accordingly. A policy compliant scheme of co-housing would result in a loss of £2.7 million (June 2022 figures, increasing to £3.5 million in August 2023). A market housing scheme (without the communal floor area, price premium CIL self-build exemption) would result in a loss of £1.2 million.
324. It is considered that the report satisfactorily demonstrates that it would not be financially viable to provide 33% affordable housing and a development of 34 units here would result in a loss. Indeed, since the initial assessment and subsequent update were submitted, the cost of other financial contributions has been confirmed so the costs of the development have only increased.

325. The applicants' intention to create an inclusive community has led to them proposing two affordable dwellings for social rent regardless of the outcome of the viability assessment. The report considers this and demonstrates that providing the two units within the co-housing proposal results in a £2 million deficit (June 2022, increasing to £2.7 million with August 2023 figures). They are committed to this aspect of the proposal and seek to secure the provision of two units for social rent for adults with learning and other disabilities with care and support commissioned by Norfolk County Council. The report also demonstrates that to provide these units within a market housing scheme would create a deficit of £792,276.

326. NPPF paragraph 58 and Policy DM33 allow for viability assessments to be taken into account when considering the application of planning obligations on a scheme. It has been satisfactorily demonstrated that the proposal could not viably deliver any on-site affordable units nor a contribution to off-site provision. The applicants' commitment to providing two units for social rent is welcomed, however as they have demonstrated this would not be viable, there is no policy basis on which this can be insisted upon or secured. A section 106 agreement should, however, include provision for re-assessment of the viability position and payment of an off-site contribution should this become viable.

Compliance with other relevant development plan policies

327. A number of development plan policies include key targets for matters such as parking provision and energy efficiency. The table below indicates the outcome of the officer assessment in relation to these matters.

Requirement	Relevant policy	Compliance
Cycle storage	DM31	Yes subject to condition
Car parking provision	DM31	Yes subject to condition
Refuse storage/servicing	DM31	Yes subject to condition
Energy efficiency	DM3, GNLP 2.10	Yes subject to condition
Water efficiency	GNLP 2.9	Yes subject to condition
Sustainable urban drainage	DM3, DM5, GNLP 2.8	Yes subject to condition
Technology based services	GNLP2.2	Fibre up to 1GB is available at the location and fibre to the premises is proposed to be provide to each dwelling. This should be secured by condition. All parking spaces would have EV charging and this should also be secured by condition.

Assessment of Impacts under the Conservation of Habitats & Species Regulations 2017 (as amended)

Nutrient Neutrality – Impact upon water quality – Broads SAC

328. On 16 March 2022, Natural England issued new guidance to a number of Local Authorities concerning nutrient enrichment and the role local authorities must play in preventing further adverse impacts to protected wetland habitats. The importance of achieving nutrient neutrality stems from evidence that large quantities of nitrogen and phosphorous entering water systems cause

excessive growth of algae, a process called 'eutrophication.' This reduces the oxygen content of water impacting aquatic species; subsequently removing a food source for protected species.

329. The advice covered two catchments in Norfolk for the River Wensum SAC and the Broads SAC/Broadland Ramsar. The entirety of Norwich City Council's administrative area is included in the Broads catchment, with a small part in the north-west covered by the Wensum catchment.
330. Based upon the identified catchment that the development proposal falls within, there is potential adverse effect on the integrity of the Broads SAC by virtue of an increase in nitrate and phosphate loading.

Recreation Impact – Various Sites (see below)

331. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS) (2021) identifies that the level of growth outlined in the Local Plan is predicted to increase the recreational disturbance and pressure on Habitats Sites, disrupting the relevant protection objectives. The Norfolk GIRAMS establishes 'Zones of Influence' (ZOIs) representing the extent of land around Habitats Sites within which residents travel to relevant sites for recreational activities. New development that falls within any of the specified ZOIs is therefore required to mitigate against these identified resultant adverse effects.
332. Sites in Norwich City Council administrative area are within the ZOI(s) of the following Habitat Sites. There is consequently a potential adverse effect on the integrity of the Sites and an appropriate assessment of impacts is therefore necessary.
- Wash ZOI
 - The Wash SPA
 - The Wash and North Norfolk Coast SAC
 - The Wash Ramsar

 - Norfolk Coast ZOI
 - North Norfolk Coast SAC
 - North Norfolk Coast SPA
 - North Norfolk Coast Ramsar

 - Valley Fens ZOI
 - Norfolk Valley Fens SAC

 - East Coast ZOI
 - Winterton – Horsey Dunes SAC
 - Great Yarmouth North Denes SPA

 - Broads ZOI
 - Broadland SPA
 - Broadland Ramsar
 - Breydon Water SPA

Appropriate Assessment

333. Due to both nutrient neutrality and recreational impact, an appropriate assessment of impacts is necessary in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended).
334. The screening has identified that the development proposal is likely to have an adverse effect on the integrity of protected Habitats sites, when considered in-combination with other housing and tourist developments. Measures are therefore needed to mitigate these negative recreational impacts.

Nutrient Neutrality

335. The impacts of the proposed development will be mitigated by the purchase of credits through the Norwich City Council Water Usage Retrofitting Mitigation Scheme (NCC WURMS). This scheme has been the subject of its own HRA, which has been reviewed separately by Natural England. Natural England has advised that planning permissions may be issued that rely on the purchase of credits from NCC WURMS.
336. In order to mitigate the impacts of the proposal, credits will need to be purchased as follows:
- 78.59 x £761.83 for nitrates; and
2.95 x £21,161.84 for phosphates.
337. A Section 106 agreement will need to be completed in order to secure the credits as set out in the plan HRA for the NCC WURMS before planning permission is granted.

Recreational Impact

RAMS Tariff

338. The Norfolk GIRAMS identifies a detailed programme of County-wide measures to mitigate against the adverse implications of in-combination recreational impacts on the integrity of the Habitats Sites caused by new residential development and tourist accommodation.
339. The strategy introduces a per-dwelling tariff to ensure development is compliant with the Habitats Regulations; the collected tariff will fund a combination of hard and soft mitigation measures at the designated Habitats Sites to increase their resilience to greater visitor numbers. The tariff is calculated as a proportionate sum of the full costs of the Norfolk-wide RAMS mitigation package as apportioned to the predicted growth outlined in the Local Plan.
340. This cost is identified as £210.84 per dwelling (index-linked), and per bedspace equivalents for tourist accommodation or student accommodation units, secured as a planning obligation.

Green Infrastructure Contribution

341. As the RAMS tariff exists to specifically mitigate the in-combination effects of new development on protected sites, an additional Green Infrastructure

contribution is also required under the Norfolk GIRAMS to deliver mitigation at a more local level by securing adequate provision to divert residents from regular visits to Habitats Sites.

342. The Norfolk GIRAMS concludes that Green Infrastructure can be delivered through existing strategic and local measures. The level of Green Infrastructure will be provided in accordance with the Council's adopted Development Plan policies. This will be on-site or, if this is not appropriate, via a bespoke planning obligation commensurate with the scale of the development.
343. In this case, the on-site provision of private and communal open space is not considered to be sufficient in scale to meet all the informal recreational needs of future occupiers. In order to mitigate any additional pressure on sensitive protected sites, it is considered necessary for the development to contribute to the enhancement of local green infrastructure.
344. The site is well located in relation to existing green spaces and the Council's Park and Open Spaces have identified opportunities for enhancements within the Wensum Park Management Plan which the development could contribute towards. On this basis, it is considered that a financial contribution of £5500 towards enhancement of existing green infrastructure would mitigate the risk of additional visitor pressures to protected sites. It is anticipated that this contribution would contribute towards a bridge at Wensum Park.
345. It is therefore necessary for this contribution to also be secured in a section 106 agreement.

Conclusion

346. Measures to address the potential adverse effects on integrity of the Broads SAC caused by increased nitrate and phosphate loading and a consequent degradation in water quality have been incorporated into the NCC WURMS through the purchase of credits.
347. Measures to address the potential adverse effects on integrity of protected Habitats Sites caused by increased recreational pressure have been incorporated into the adopted Norfolk GIRAMS. This strategy requires new development to provide twofold mitigation to be legally compliant with the Habitats Regulations: payment of the RAMS tariff and provision of Green Infrastructure relevant to the scale of the proposal.
348. Subject to these mitigation measures being secured via a planning obligation and conditions, this assessment is able to conclude no adverse effects of the development proposal on the integrity of internationally designated wildlife sites in relation to recreation.
349. Natural England have no objection to the application, subject to these mitigation measures being secured.
350. The proposed development is of a nature and scale that there are no additional implications for protected habitat sites beyond those being mitigated by NCC WURMS and Norfolk GIRAMS.

Equalities and diversity issues

351. There are no equality or diversity issues.

S106 Obligations

352. Norfolk County Council have confirmed that there is no requirement for specific obligations to contribute toward infrastructure as this is funded through CIL.

353. The applicants have submitted draft heads of terms to form the basis of a section 106 agreement to secure: affordable housing viability review, payment of the GIRAMS tariff, a contribution to enhanced green infrastructure, payment for nutrient neutrality mitigation credits and a contribution for mitigatory tree planting.

354. It is considered that securing these obligations are necessary to make the development acceptable in planning terms; directly related to the development; and, fairly and reasonably related in scale and kind to the development. The use of a section 106 agreement to secure these on the permission would therefore be compliant with paragraph 57 of the NPPF and regulation 122(2) of the Community Infrastructure Levy Regulations (2010).

355. Should the assessment conclude that the development is only acceptable as co-housing, it shall also be necessary for the agreement to ensure that the dwellings are occupied and the whole development is managed as co-housing for its lifetime and complies with the definition of community-led development. This does not necessarily need to be the current applicants so the wording should allow flexibility for any co-housing group to bring the scheme forward but shall need to ensure that future changes in ownership of individual units and communal spaces continues to provide co-housing.

Local finance considerations

356. Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are defined as a government grant or the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority.

357. In this case local finance considerations are not considered to be material to the case.

Human Rights Act 1998

358. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to approve this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

359. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to grant planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

360. This application proposes redeveloping a largely vacant site and delivering the long-held site allocation for new housing. It is therefore supported in principle.

361. The objectives of the site allocation and other policies to ensure any redevelopment of this site reinstates historic building lines, has buildings arranged around a courtyard and delivers a high quality, locally distinct detail would be achieved

362. However, by providing 34 units of predominantly flats in bulky four storey blocks, the scale, density and housing mix does not directly reflect the prevailing character or local housing need and would result in some harm to heritage assets and local character. The number, type and mix of units, and thus the overall scale of the buildings, has been dictated by the particular needs of the applicants to provide a co-housing scheme for their members. In order to accommodate a viable number of units and meet the demand the group has attracted, a layout which necessitates the loss of an important tree in the Conservation Area is proposed.

363. General needs market housing on this site would deliver the public benefits of contributing 34 dwellings to local housing supply; remediating and regenerating this long-term vacant and detrimental site; and, potential to stimulate and inspire further regeneration. However, general market occupiers would be disadvantaged by the low levels of privacy, private space and close proximity of buildings which the particular design for co-housing provides. Overall, it is not considered that the development would provide an acceptable standard of amenity or living conditions for general needs market housing.

364. The NPPF provides support for housing which meets the needs of particular groups, is community-led or is self or customer built. In this case, the co-housing represents all three and these are factors which weigh in favour of the development. Furthermore, the distinct principles of co-housing which set it apart from speculative market development include the high degree of sustainability the applicants are seeking to achieve and ability to collectively manage facilities which would rely on sharing, such as the car parking, amenity spaces and common house. These positive aspects do not attract the same degree of weight and could, in principle, be delivered in a general market scheme but are less likely to.

365. The favourable aspects must be considered in the balance against the scale, harm to heritage assets, loss of tree and other adverse impacts. Given that the applicants have a demonstrable demand for co-housing for their 34 members, that this demand would not be met by any existing or forthcoming developments in the city and that they appear committed to delivering this

scheme, it is considered that allowing this development only as co-housing is both necessary to make it acceptable in planning terms and provides a benefit to the diversity of local housing supply which attracts substantial weight in favour of the proposal.

366. It is regrettable that negotiations to further reduce the harmful impacts of the scale and retain the willow tree have not been successful, however the applicants wish for the application to be determined as it stands and it is considered that the design revisions which have been made improve the architectural quality and response to heritage assets and the loss of the tree can be adequately mitigated on and off site.
367. Harm to neighbouring occupiers resulting from overshadowing, loss of light and overlooking is not unacceptable and matters including parking management, renewable energy, water efficiency, flood risk, biodiversity enhancement and contamination can be satisfactorily resolved by condition.
368. It is necessary for potential significant effects on protected habitat sites to be mitigated with contributions to nutrient neutrality and green infrastructure. An agreement to secure these also needs to secure a contribution to tree planting and make provision for viability review. Given that it is considered necessary to ensure that the dwellings are only delivered, occupied and managed as co-housing, the section 106 also needs to cover this.
369. Subject to this agreement and the conditions recommended below, the development is in accordance with the requirements of the National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

Recommendation

370. To approve application no. 22/00762/ Land and buildings including 70-72 Sussex Street and land north side of 148 Oak Street and grant planning permission subject to the completion of a satisfactory legal agreement to include provision of co-housing, affordable housing viability review, payment of the GIRAMS tariff, a contribution to enhanced green infrastructure, payment for nutrient neutrality mitigation credits and a contribution for mitigatory tree planting and subject to the following conditions:

1. Standard time limit
2. In accordance with plans
3. Phasing plan to be agreed
4. Construction management plan, including parking
5. Archaeological written scheme of investigation
6. Detailed drawings for off-site highway improvements to be agreed
7. Nesting bird season
8. Contamination remediation
9. Air quality best practice
10. Surface water drainage strategy
11. Foul drainage strategy
12. Renewable energy provision
13. Detailed design of corner shopfront and chimney features
14. Fascia signage design
15. Material and brickwork details

16. Detailed landscape and biodiversity scheme and management plan
17. Heritage interpretation
18. Noise specification
19. Mechanical ventilation
20. Sound insulation of plant and machinery
21. Anti-vibration mountings for plant and machinery
22. Car parking management plan
23. Bin store collection arrangements
24. 20% accessible and adaptable dwellings
25. Water efficiency
26. Small mammal access
27. Unknown contamination
28. Imported material
29. Access, parking, EV charging, cycle stores to be provided prior to first occupation
30. Off-site highway improvements to be completed prior to first occupation
31. Fibre to the property provided prior to first occupation
32. Removed permitted development rights for curtilage structures and extensions to houses
33. Access gates hung to open inwards

Informatives

- No parking permits for future occupiers
- Street naming and numbering
- Asbestos
- Works within public highway
- Permits required for hoardings and traffic management

Appendices: None

Contact officer: Planner

Name: Maria Hammond

Telephone number: 01603 989396

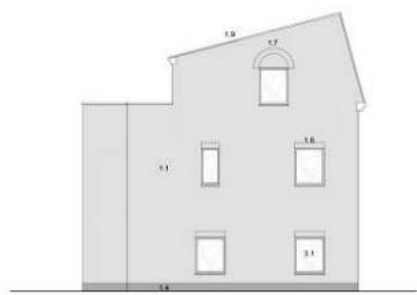
Email address: mariahammond@norwich.gov.uk



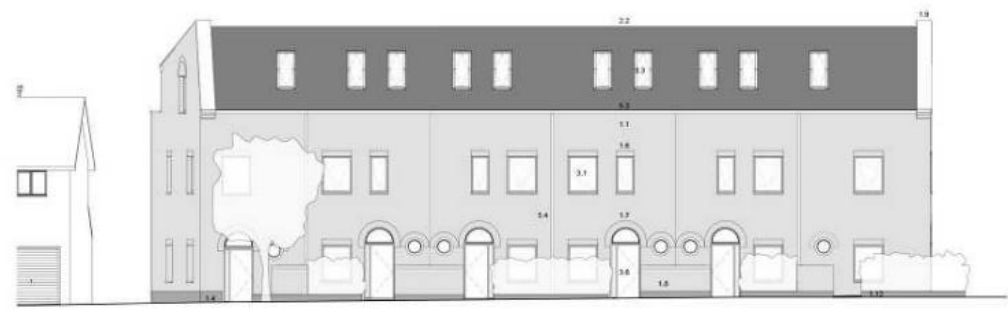
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Revision	Rev. Date	By	Description	Approved
P1	18.03.22	SA	For Information	MS
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P4	12.05.22	SA	Planning	MS
P5	30.06.22	SA	For Information	JP
P6	13.07.22	SA	For Information	JP
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P8	11.08.22	SA	Planning	JP

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1 Chatham Street South Elevation
1:100



2 Chatham Street East Elevation
1:100

1. Facade Materials
 - 1.1 Clay painted brick with a weather band
 - 1.2 Dark grey painted brick with a weather band
 - 1.3 Dark grey painted brick with a weather band and window surrounds
 - 1.4 Colour glass with a slight highlight and a thin glass panel
 - 1.5 White painted brick with a weather band
 - 1.6 Dark grey painted brick with a weather band
 - 1.7 Dark grey painted brick with a weather band
 - 1.8 Dark grey painted brick with a weather band
 - 1.9 Dark grey painted brick with a weather band
 - 1.10 Dark grey painted brick with a weather band
 - 1.11 Dark grey painted brick with a weather band
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 - 1.17 Dark grey painted brick with a weather band
 - 1.18 Dark grey painted brick with a weather band
 - 1.19 Dark grey painted brick with a weather band
 - 1.20 Dark grey painted brick with a weather band
2. Roof Materials
 - 2.1 Clay roof
 - 2.2 Clay roof, dark glazed brick
 - 2.3 Clay roof
3. Windows & doors
 - 3.1 Contemporary aluminium composite window with silver sight lines, 6kg Regal Cook
 - 3.2 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.3 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.4 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.5 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.6 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.7 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
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 - 3.18 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.19 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
 - 3.20 Aluminium uPVC frame, Minimum external window reveal from face of masonry of 20mm
4. Materials, wallings and arching
 - 4.1 Dark grey painted brick with a weather band
 - 4.2 Dark grey painted brick with a weather band
 - 4.3 Dark grey painted brick with a weather band
 - 4.4 Dark grey painted brick with a weather band
 - 4.5 Dark grey painted brick with a weather band
 - 4.6 Dark grey painted brick with a weather band
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 - 4.17 Dark grey painted brick with a weather band
 - 4.18 Dark grey painted brick with a weather band
 - 4.19 Dark grey painted brick with a weather band
 - 4.20 Dark grey painted brick with a weather band
5. Miscellaneous
 - 5.1 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.2 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.3 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.4 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.5 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.6 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.7 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.8 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.9 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.10 Metal rainwater pipe and down pipe and gutter and down pipe outlet
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 - 5.14 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.15 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.16 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.17 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.18 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.19 Metal rainwater pipe and down pipe and gutter and down pipe outlet
 - 5.20 Metal rainwater pipe and down pipe and gutter and down pipe outlet

Client: Angel Yard Co-Housing CIC
 Project: Angel Yard
 Sheet: Street Facing Elevations 1/3
 Date of Origin: 01.09.2021
 Project Number: 59346
 Scale: (A1) 1:100
 Drawn by: Author
 Drawing Number: DC_FR_200
 Rev: 08
 Drawing Status: For Information



Revision	Rev. Date	By	Description	Approved
P1	18.03.22	SA	For Information	MS
P2	14.04.22	SA	For Information	MS
P3	06.05.22	SA	For Information	MS
P4	12.05.22	SA	Planning	MS
P5	30.06.22	SA	For Information	JF
P6	28.07.22	SA	Planning	JF
P7	11.08.22	SA	Planning	JF

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Signage font and detail to be confirmed



1 Sussex Street North Elevation
1 : 100

- 1 Facade materials
- 1.1 Fine grained sand brick in weather band
- 1.2 Painted stone brick facade for north and south elevations, weather band only
- 1.3 Coloured glass to signage and light to first floor of base of modern wing
- 1.4 Aluminium window and door frames
- 1.5 Aluminium window and door frames
- 1.6 Aluminium window and door frames
- 1.7 Aluminium window and door frames
- 1.8 Aluminium window and door frames
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- 1.99 Aluminium window and door frames
- 1.100 Aluminium window and door frames

Client
Angel Yard Co-Housing CIC

Project
Angel Yard

Sheet
Street Facing Elevations 2/3

Date of Origin
01.09.2021

Project Number
59346

Scale (A1)
1 : 100

Drawn By
SA

Drawing Number
DC_FR_201

Rev
R1

For Information

Archio

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London SW9 4DF
T: 020 89 46 466 www.archio.co.uk



Revision	Rev. Date	By	Description	Approved
P1	18.03.22 SA		For Information	MH
P2	14.04.22 SA		For Information	MH
P3	06.05.22 SA		For Information	MH
P4	12.05.22 SA		Planning	MH
P5	30.06.22 SA		For Information	JF
P6	28.07.22 SA		Planning	JF
P7	11.08.22 SA		Planning	JF
P8	23.11.22 SA		Planning	JF

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Signage font and detail to be confirmed



1 Oak Street West Elevation
1:100



2 Oak Street South Elevation
1:100

- 1 Facade details
 - 1.1 Flat ground level finish to external kerb
 - 1.2 Flat ground level to parapets or unclimbed
 - 1.3 External ground level finish to wall and parapet external finish
 - 1.4 External ground level finish to parapet and to parapet external finish
 - 1.5 External ground level finish to parapet and to parapet external finish
 - 1.6 External ground level finish to parapet and to parapet external finish
 - 1.7 External ground level finish to parapet and to parapet external finish
 - 1.8 External ground level finish to parapet and to parapet external finish
 - 1.9 External ground level finish to parapet and to parapet external finish
 - 1.10 External ground level finish to parapet and to parapet external finish
 - 1.11 External ground level finish to parapet and to parapet external finish
 - 1.12 External ground level finish to parapet and to parapet external finish
 - 1.13 External ground level finish to parapet and to parapet external finish
 - 1.14 External ground level finish to parapet and to parapet external finish
- 2 Roof details
 - 2.1 Flat roof
 - 2.2 Clay roofing, metal glazed roof
 - 2.3 Flat roof
- 3 Windows & doors
 - 3.1 Contemporary aluminium composite window with slim sight line. Eg. 300 Series - single, 300 Series - Multiple window and door from the line of window or door.
 - 3.2 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Single window and door.
 - 3.3 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.4 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.5 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.6 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.7 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.8 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.9 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.10 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.11 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.12 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.13 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.14 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.15 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.16 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.17 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.18 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.19 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
 - 3.20 Contemporary aluminium composite sliding window with slim sight line. 300 Series - Multiple window and door.
- 4 External wallings and activity
 - 4.1 Metal horizontal wall panels
 - 4.2 Metal horizontal wall panels
 - 4.3 Metal horizontal wall panels
 - 4.4 Metal horizontal wall panels
 - 4.5 Metal horizontal wall panels
 - 4.6 Metal horizontal wall panels
 - 4.7 Metal horizontal wall panels
 - 4.8 Metal horizontal wall panels
 - 4.9 Metal horizontal wall panels
 - 4.10 Metal horizontal wall panels
 - 4.11 Metal horizontal wall panels
 - 4.12 Metal horizontal wall panels
 - 4.13 Metal horizontal wall panels
 - 4.14 Metal horizontal wall panels
 - 4.15 Metal horizontal wall panels
 - 4.16 Metal horizontal wall panels
 - 4.17 Metal horizontal wall panels
 - 4.18 Metal horizontal wall panels
 - 4.19 Metal horizontal wall panels
 - 4.20 Metal horizontal wall panels

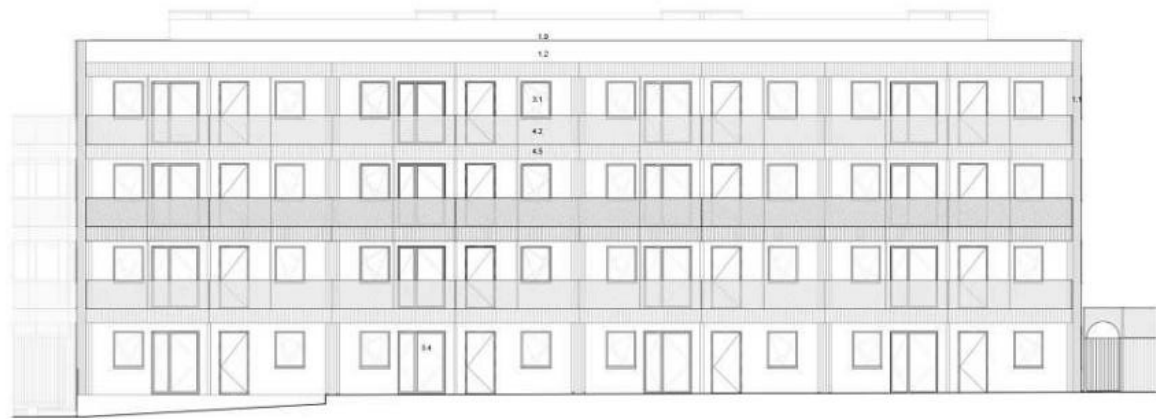
Client: Angel Yard Co-Housing CIC
 Project: Angel Yard
 Street: Street Facing Elevations 3/3
 Date of Draw: 01.09.2023
 Project Number: 59348
 Scale: A3 (1:100)
 Drawn By: SA
 Drawing Number: DK_FR_202
 Rev: 08
 Drawing Status: For Information



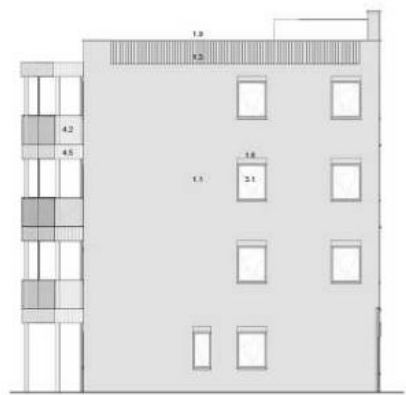
Revision	Rev. Date	By	Description	Approved
P1	18.03.22	SA	For Information	MPH
P2	14.04.22	SA	For Information	MPH
P3	06.05.22	SA	For Information	MPH
P4	12.05.22	SA	Planning	MPH
P5	30.06.22	SA	For Information	JF
P6	28.07.22	SA	Planning	JF
P7	11.08.22	SA	Planning	JF

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Notes



1 Sussex Street South Elevation - Courtyard
1:100



2 Sussex Street East Elevation - Courtyard
1:100

1. Courtyard
 - 1.1 Plan proposed back brick or stone/stone
 - 1.2 Plan proposed brick or stone/stone
 - 1.3 Plan proposed brick or stone/stone
 - 1.4 Plan proposed brick or stone/stone
 - 1.5 Plan proposed brick or stone/stone
 - 1.6 Plan proposed brick or stone/stone
 - 1.7 Plan proposed brick or stone/stone
 - 1.8 Plan proposed brick or stone/stone
 - 1.9 Plan proposed brick or stone/stone
 - 1.10 Plan proposed brick or stone/stone
2. Roof Details
 - 2.1 Plan proposed
 - 2.2 Plan proposed
 - 2.3 Plan proposed
3. Windows & Doors
 - 3.1 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.2 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.3 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.4 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.5 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.6 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.7 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.8 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.9 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
 - 3.10 Contemporary aluminium composite window with slim sight lines. E.g. Best Case
4. Balconies, walkways and arches
 - 4.1 Plan proposed
 - 4.2 Plan proposed
 - 4.3 Plan proposed
 - 4.4 Plan proposed
 - 4.5 Plan proposed
 - 4.6 Plan proposed
 - 4.7 Plan proposed
 - 4.8 Plan proposed
 - 4.9 Plan proposed
 - 4.10 Plan proposed
5. Woodwork
 - 5.1 Plan proposed
 - 5.2 Plan proposed
 - 5.3 Plan proposed
 - 5.4 Plan proposed
 - 5.5 Plan proposed
 - 5.6 Plan proposed
 - 5.7 Plan proposed
 - 5.8 Plan proposed
 - 5.9 Plan proposed
 - 5.10 Plan proposed

Client
Angel Yard Co-Housing CIC

Project
Angel Yard

Sheet
Courtyard Facing Elevations 2/3

Date of Origin
01.09.2021

Project Number
59346

Scale (A1)
1:100

Drawn By
Author

Drawing Number
DK_FR_204

Rev
P1

For Information





Revision	Rev	By	Description	Approved
P1	17.08.21	JP	For information	MH
P2	24.08.21	JP	For information	MH
P3	01.09.21	SA	For information	MH
P4	14.09.21	SA	For information	MH
P5	12.10.21	SA	For information	MH
P6	07.01.22	SA	For information	MH
P7	19.01.22	SA	For information	MH
P8	14.02.22	SA	For information	MH
P9	26.02.22	JP	For information	JP
P10	01.03.22	JP	For information	MH
P11	08.03.22	JP	For information	JP
P12	15.03.22	SA	For information	MH
P13	14.04.22	SA	For information	MH
P14	06.05.22	SA	For information	MH
P15	08.05.22	SA	For information	MH
P16	12.05.22	SA	Planning	MH
P17	30.06.22	SA	For information	JP
P18	28.07.22	SA	Planning	JP
P19	11.08.22	SA	Planning	JP
P20	14.11.22	SA	Planning	JP

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Notes

Client: Angel Yard Co-Housing CIC
 Project: Angel Yard
 Sheet: Proposed Ground Floor Plan
 Date of Origin: 01.09.2021 Project Number: 59348 Scale: (A1) 1:250
 Drawn By: SA Drawing Number: 06_P1019 Rev: P20
 Drawing Status: For Information

Archio
 140-150 Tottenham Court Road
 London W1P 0LP
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Revision	Rev. Date	By	Description	Approved
P1	17.08.21	JF	For Information	MH
P2	24.08.21	JF	For Information	MH
P3	01.09.21	SA	For Information	MH
P4	14.09.21	SA	For Information	MH
P5	12.10.21	SA	For Information	MH
P6	07.01.22	SA	For Information	MH
P7	19.01.22	SA	For Information	MH
P8	14.02.22	SA	For Information	MH
P9	01.03.22	JF	For Information	MH
P10	09.03.22	JF	For Information	JF
P11	18.03.22	SA	For Information	MH
P12	14.04.22	SA	For Information	MH
P13	06.05.22	SA	For Information	MH
P14	12.05.22	SA	Planning	MH
P15	30.06.22	SA	For Information	JF
P16	28.07.22	SA	Planning	JF
P17	11.08.22	SA	Planning	JF

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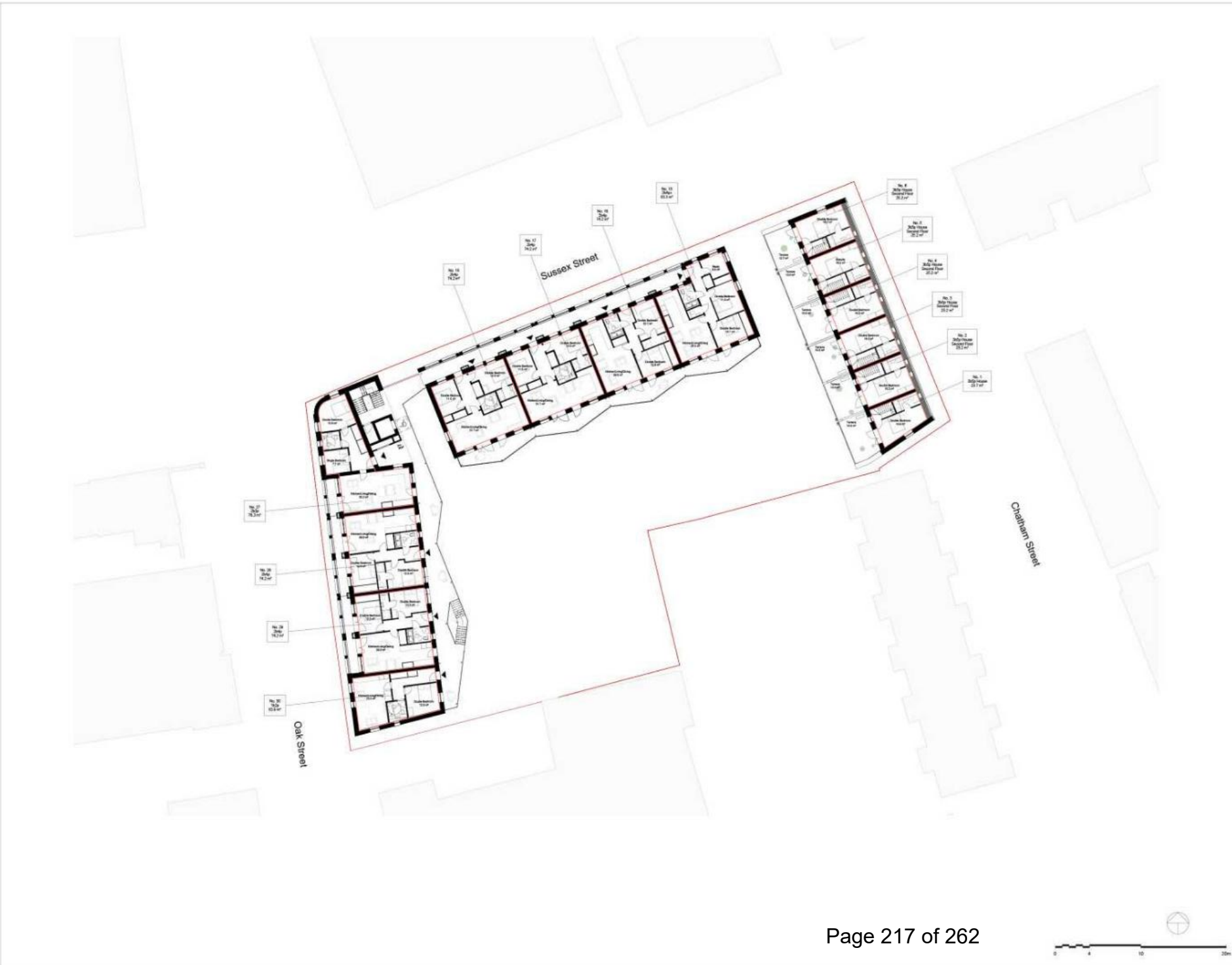
Notes

Client	Angel Yard Co-Housing CIC		
Project	Angel Yard		
Sheet	Proposed First Floor Plan		
Date of Origin	Project Number	Scale (A1)	
01.09.2021	59346	1:250	
Drawn By	Drawing Number	Rev.	
SA	06_P101	1/1	
Drawing Status	For Information		

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Revision	Rev. Date	By	Description	Approved
P1	17.08.21	JF	For Information	MH
P2	24.08.21	JF	For Information	MH
P3	01.09.21	SA	For Information	MH
P4	14.09.21	SA	For Information	MH
P5	12.10.21	SA	For Information	MH
P6	07.01.22	SA	For Information	MH
P7	19.01.22	SA	For Information	MH
P8	14.02.22	SA	For Information	MH
P9	01.03.22	JF	For Information	MH
P10	09.03.22	JF	For Information	JF
P11	18.03.22	SA	For Information	MH
P12	14.04.22	SA	For Information	MH
P13	06.05.22	SA	For Information	MH
P16	12.05.22	SA	Planning	MH
P15	30.06.22	SA	For Information	JF
P18	28.07.22	SA	Planning	JF
P17	11.08.22	SA	Planning	JF

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Notes

Client	Angel Yard Co-Housing CIC		
Project	Angel Yard		
Sheet	Proposed Second Floor Plan		
Date of Origin	Project Number	Scale (A1)	
01.09.2021	59346	1:250	
Drawn By	Drawing Number	Rev.	
SA	06_P1202	P17	
Drawing Status	For Information		





Revision	Rev	Date	By	Description	Approved
P1	17.08.21	JP		For Information	MH
P2	24.08.21	JP		For Information	MH
P3	07.01.22	SA		For Information	MH
P4	18.01.22	SA		For Information	MH
P5	14.02.22	SA		For Information	MH
P6	01.03.22	JP		For Information	MH
P7	09.03.22	JP		For Information	JP
P8	18.03.22	SA		For Information	MH
P9	14.04.22	SA		For Information	MH
P10	08.05.22	SA		For Information	MH
P11	12.05.22	SA		Planning	MH
P12	26.06.22	SA		For Information	JP
P13	28.07.22	SA		Planning	JP
P14	11.08.22	SA		Planning	JP

This drawing is produced for planning purposes only. Do not scale from this drawing. All spatial dimensions and bearings to be used in construction shall refer to the National Grid and the Ordnance Survey map. The drawing is copyright.

- Notes:
1. Zone for Solar Pits
 2. Proposed Accessways
 3. Proposed Amenities
 4. Plant Room
 5. Plant Room
 6. Car Wash/Storage
 7. Other Highways
 8. Access Point

Client	Angel Yard Co-Housing CIC		
Project	Angel Yard		
Sheet	Proposed Third Floor Plan		
Date of Origin	Project Number	Scale (A1)	
01.09.2021	59346	1 : 250	
Drawn By	Drawing Number	Rev.	P14
SA	06_P14(3)		
Drawing Status For Information			



KEY

	SITE BOUNDARY
	HARD LANDSCAPE Refer to 807-FH-XX-00-DP-L-101
	SOFT LANDSCAPE Refer to 807-FH-XX-00-DP-L-401
	LANDSCAPE ELEMENTS Refer to 807-FH-XX-00-DP-L-601
	KERBS AND EDGES Refer to 807-FH-XX-00-DP-L-202
	WALLS AND BOUNDARIES Refer to 807-FH-XX-00-DP-L-501



- NOTES:**
1. This drawing is to be read in conjunction with all relevant contract documentation from the design team, with any clarifying information to be brought to the attention of Farrer Huxley Associates in writing before commencing on site.
 2. The contractor is to check and verify all levels and dimensions before construction. Any discrepancies are to be brought to the attention of Farrer Huxley Associates in writing before commencing on site.
 3. All dimensions in mm, unless otherwise stated.
 4. Do not scale from this drawing.
 5. All sub base and concrete design and specification to engineer's details. All diagrams provided here are purely indicative.
 6. Waterproofing of any element to be specified by others.
 7. All proprietary products shall be installed in accordance with manufacturers written instructions.
 8. Plant markers are an indication only and plants should be ordered to suit site areas in accordance with scheduled plant details.
 9. Any proposed plant substitution shall be agreed with the landscape architect prior to ordering.

General drawing references, PHH information naming as:
 XXX-FH-XX-00-DP-... for Plans
 XXX-FH-XX-00-DP-... for Details

For General arrangement, refer to ...200's series;
 For hard landscape, refer to ...200's series;
 For kerbs and drainage refer to ...300's series;
 For soft landscape, refer to ...400's series;
 For lighting, refer to ...500's series

NO.	DATE	DESCRIPTION OF REVISION	ISSUED	APPROVED
000001	00	LANDSCAPE ELEMENTS	00	00
000002	00	LANDSCAPE ELEMENTS	00	00
000003	00	LANDSCAPE ELEMENTS	00	00
000004	00	LANDSCAPE ELEMENTS	00	00
000005	00	LANDSCAPE ELEMENTS	00	00
000006	00	LANDSCAPE ELEMENTS	00	00
000007	00	LANDSCAPE ELEMENTS	00	00
000008	00	LANDSCAPE ELEMENTS	00	00
000009	00	LANDSCAPE ELEMENTS	00	00
000010	00	LANDSCAPE ELEMENTS	00	00

FARRER HUXLEY

Unit 11, Union Wharf
 23 Wrenlock Road, London, W1 7SD
 www.farrerhuxley.co.uk info@farrerhuxley.co.uk
 T: 020 7490 3625

DRAWING STATUS:
PLANNING

CLIENT:
 SUSSEX STREET COHOUSING

PROJECT TITLE:
ANGEL YARD

DRAWING TITLE:
GENERAL ARRANGEMENT

1 OF 1

DRAWING NO:	00	DATE:	04/05/2022
SCALE:	1:150	BY:	IM
NO:	A1	CHECKED BY:	NF
DRAWING NUMBER:	807-FH-XX-00-DP-L-101	REVISION:	08





Committee name: Planning applications

Committee date: 21/03/2024

Report title: Application no 22/01417/F – End House, Church Avenue East

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

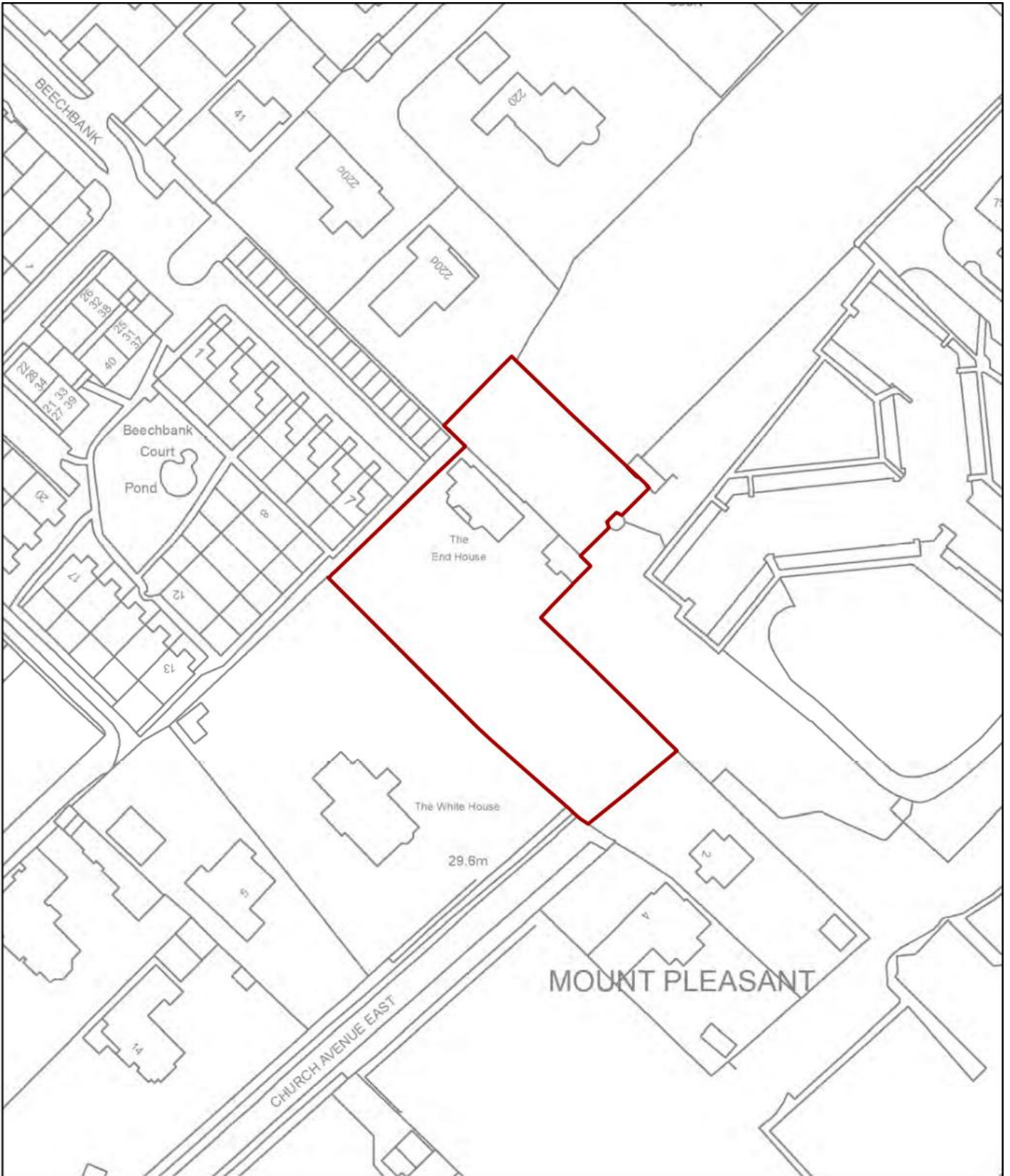
To determine:

Application no:	22/01417/F
Site Address:	End House, Church Avenue East, Norwich
Decision due by:	29/03/2024
Proposal:	Demolition of existing house and construction of replacement house and stand-alone garage (revised proposal).
Key considerations:	Principle of replacement dwelling; Design; Heritage; Amenity; Trees; Transportation; Flood risk; Biodiversity
Ward:	Eaton
Case Officer:	Maria Hammond
Applicant/agent:	Mr Mike Page/Crispin Lambert, LBR Architecture Ltd.

Reason at Committee: Objections

Recommendation:

It is recommended to approve the application for the reasons given in the report and subject to the planning conditions set out in paragraph 126 of this report, and grant planning permission.



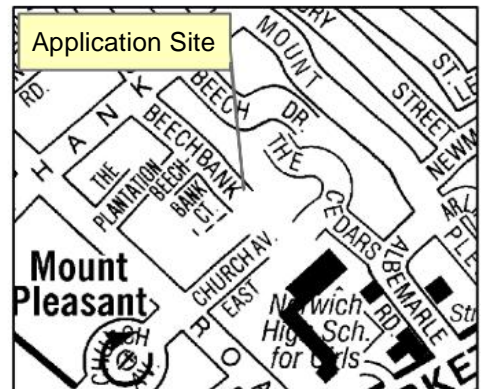
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Planning Application No 22/01417/F
 Site Address End House, Church Avenue East

Scale 1:1,000



NORWICH
 City Council
 PLANNING SERVICES



The site and surroundings

1. End House is a detached two storey dwelling in a generous plot. It is located at the northeastern end of Church Avenue East, a private road off Christchurch Road.
2. The dwelling dates from the early nineteenth century and originally formed a pair of semi-detached cottages for workers employed in horticulture at a nearby estate. The cottages were amalgamated into a single dwelling and extended at each side in the twentieth century. The original part of the building has painted brick under a pantile roof with two bay windows to the front. The twentieth century extensions at each end are in buff brick with some waney edge timber boarding.
3. The plot is 'L' shaped with access at the southeastern corner following a driveway around the eastern side to the front of the dwelling which sits at the centre. A red brick former forcing house now used as a garage sits to the southeastern side and to the north there is a large, open garden area enclosed on two sides with brick walls and to the southeastern side by a Victorian flint folly (outside the applicant's ownership). This space was originally a kitchen garden to The Cedars to the northeast and was not in the same ownership or occupation as the cottages until 1978. The area to the front and southeast of the dwelling is largely laid to lawn with areas of garden planting. Within the site there are some trees concentrated to the northwest and southwest and these combine with substantial and mature trees and woodland immediately beyond these boundaries to contribute to a sense of enclosure and seclusion that is characteristic along Church Avenue East.
4. Northeast the garden borders an area of open space that forms part of the Norwich High School for Girls site. Southeast, a small area of woodland borders the site, beyond which is The Cedars sheltered housing complex. Southwest is a substantial detached nineteenth century locally listed white painted dwelling in a large plot and beyond this is a more recent dwelling of similar scale. The opposite side of the road is more mixed, with two dwellings at the northeastern end and a further area of the Norwich High School for Girls site bordering the road.
5. To the northwest the site borders the end of Beechbank. This is a private residential road which, closest to the application site, has a terrace of three storey townhouses facing northeast along the southern side and a row of garages on the opposite side of the road. A substantial ash tree stands within a hedge across the end of the road immediately against a fence boundary to the application site. Beyond the row of garages there are detached dwellings accessed off Unthank Road and the closest one which borders the site also has mature trees close to the boundary.

Constraints

6. The site is within the Newmarket Road Conservation Area, close to the boundary with the Unthank and Christchurch Conservation Area.
7. The application site, by virtue of the evidential and historic value of the original workers cottages, their curtilage and the once separate kitchen garden, is considered to be a non-designated heritage asset. The folly is also.

8. A group of trees outside the site along the northwest boundary are protected by a TPO as is a woodland area to the immediate east.
9. The neighbouring dwelling to the south is locally listed as are the row of dwellings along Christchurch Road either side of the junction with Church Avenue East. There are numerous locally listed and some statutorily listed buildings in the wider area, including Christ Church.
10. The site is in a critical drainage catchment and there are areas of low, medium and high surface water flood risk within the site.

Relevant Planning History

11. The records held by the city council show the following planning history for the site.

Case no	Proposal	Decision	Date
4/1991/0268	Demolition of double garage and erection of new double garage.	APCON	27/06/1991
4/1999/0484	Demolition of garage and erection of new double garage (renewal of 4960435/F).	APPR	29/07/1999
04/00252/O	Erection of one detached dwelling.	APPR	19/04/2004
19/01209/TCA	Oak (T1): Crown lift to 4 metres and reduce one branch where over the garden of End House; Norway Maple (T2): Remove 3 low branches from the trunk to a height of 3 metres; Holly (T3): Fell; Eucalyptus (T4): Fell; Elm (T5): Fell; Oak (T6): Lift to 4m where over the garden of End House; Douglas Fir (T7): Remove dead and hanging branches; Douglas Fir (T8): Fell; Douglas Fir (T9): Fell; Douglas Fir (T10): Fell	NTPOS	12/09/2019
20/00908/F	Demolition of existing dwelling and construction of 2No. dwellings.	WITHDN	27/10/2020
21/01829/F	Demolition of existing dwelling and garage. Construction of 2No. dwellings with 2No. garages.	WITHDN	11/02/2022

The Proposal

12. The application proposes demolishing the existing dwelling and building a replacement in the same area of the site. A detached garage is also proposed.
13. The replacement dwelling would sit on the same axis as the existing. The main body of the two storey dwelling would sit under a gabled roof and to the front two gables would project out an angle facing due south to maximise solar gain. The rear and side walls and roof would be wrapped in a grey metal cladding with white render to the gable ends and red brick and flint to a single storey section that would connect to the existing forcing house which is to be retained and altered for ancillary storage. The upper sections of the two south facing gables would have louvres above large areas of glazing and the cladding would wrap around the edges of these gables.
14. Internally it would provide one ground floor bedroom and four on the first floor. To mitigate flood risk, the finished ground floor level would be 635mm above ground level and there would be some external regrading of levels.
15. The double garage would sit against the southwestern boundary. This would have red brick walls under a metal roof with PV panels across the rear elevation and EV charging inside.
16. The application originally also proposed an additional dwelling within the site. This aspect of the proposal created a net increase in dwellings with additional nutrient pollution. In the absence of any available mitigation to make the development nutrient neutral, the applicant chose to omit that part of the scheme and only propose the replacement dwelling to avoid any further delay in receiving a decision on this. They are aware that any future application for a new dwelling would be considered on its own merits. Members are advised that the potential for such an application in future is not a material consideration in the determination of this application.

Summary of Proposal – Key facts:

17. The key facts of the proposal are summarised in the tables below:

Scale	Key Facts
Total floorspace	314 square metres
No. of storeys	Two storeys
Max. dimensions	24.3 metres in length, 11.8 metres at the deepest point and the highest ridge is 9.44 metres above the average proposed ground level

Appearance	Key Facts
Materials	Grey standing seam metal, white render, red brick, flint and aluminum windows
Energy and resource efficiency measures	Air source heat pump and solar PV panels

Transport Matters	Key Facts
Vehicular access	As existing, altered to allow fire appliance access
No of car parking	Two spaces in proposed garage

spaces	
No of cycle parking spaces	Cycle storage in proposed garage to each dwelling
Servicing arrangements	Bin storage area identified, collection from road as existing

Consultation responses

18. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Representations

19. Adjacent and neighbouring properties have been notified in writing. Representations from six neighbours have been received citing the issues as summarised in the table below:

Issues raised	Response
New building line (height) will be overbearing, dominant and oppressive, strongly object to greatly increased height	See main issue 4
Loss of light	See main issue 4
Obscure views of trees and sky. Drastically change environment. Massive, largely unbroken wall in view from Beechbank.	See main issue 4 concerning outlook
Roof is steeper and higher than it needs to be.	See main issue 2
2.3m higher than existing, a storey height taller. Attic roof space could be converted. Steep pitch.	See main issue 2
Suggestions to reduce roof pitch and height and site elsewhere in plot	The application must be determined as submitted. See main issue 2
Looks like blocky, massive industrial unit. Commercial appearance. Out of keeping in Conservation Area. Inappropriate commercial materials.	See main issues 2 and 3
Submitted image from Beechbank reinforces concerns about dominating and detrimental impact. Image is not a reliable representation, misleading and not acceptable.	See main issues 2 and 3
Absence of detail on choice and distribution of materials, metal cladding could increase dominating effect of house	See main issue 2
Suggest moving house further from Beechbank boundary and reducing height.	The application must be determined as submitted.
Is raised floor level excessively cautious? No flooding previously.	There is an identified risk of surface water flooding within the site. See main issue 7.

Issues raised	Response
Air source heat pump faces neighbouring dwelling's bedrooms	See main issue 4
Concern about noise, vibrations and dust from demolition and construction – appropriate measures should be taken to minimise, monitor and record	See main issue 4
Concerned construction work may damage mature ash tree on Beechbank side of boundary and light to it would be reduced, tree is of significant benefit to Beechbank	See main issue 5
Neighbouring trees missing from plan	The Tree Protection Officer has visited the neighbouring site and is satisfied the protection measures are adequate for all neighbouring trees.
Concreting over larger footprint must have environmental significance on rare wildlife corridor and water supply to protected trees	See main issue 8. This comment was received in response to the original proposal, the revised proposal reduces the footprint of the development.
No assessment of visual impact on Beechbank and absence of heights, contextual elevations, 3D studies, etc.	The application met all the validation requirements and includes all the information required for determination.
Impact on property value	Not a material planning consideration

Statutory and non-statutory consultees

Design and Conservation (Norwich City Council)

20. The issues in this case are the proposals effect upon the character and appearance of the Newmarket Road Conservation Area.
21. The proposed construction of a new family dwelling will see the demolition of the existing family dwelling. Originally constructed in c.1838 as a pair of semi-detached properties that were converted into a single property in c.1931 with later additions in c.1965 and c.1971. The original part of the Building is rendered with the later additions made of yellow brick and timber cladding on the upper section of the gable end.
22. The Building has an interesting history, beginning its life as a pair of cottages for local horticultural workers. To the rear of the Building is a kitchen garden and the remains of a flint folly. Strictly speaking, the folly is not within the boundary of the application, however, the impact of the proposal towards the folly should be assessed. The earliest recorded reference of the Building is the 1884 Town Plan Map, which details the folly and has been assessed as being a non-designated heritage asset. It considered that the proposal does not negatively affect the folly and with the introduction of flint within the materiality of the proposed Building will harmonise the two structures together. It could be interpreted that the two protruding gable ends on the south elevation resemble the appearance of two dwellings which respects the original pair of cottages.

23. It is understood that the existing property is not suitable for the occupants and not viable to refurbish to their required needs. The principle of the development is acceptable; however, the new dwelling needs to be sympathetic to the Conservation Area. The proposal seeks to construct a two-storey dwelling with a single storey element which links the new dwelling to the existing former warming house, which will allow a clear link to past use of the site. The scale and positioning of the new dwelling is relatively similar to the existing dwelling and retains the same axis and orientation.
24. Compared to the previous design (21/01829/F) the current proposal is much more traditional design that is in keeping within the Conservation Area. The proposal exhibits a traditional form, with two prominent extruding gable ends to the south elevation. This feature gives the building a modern feel whilst retaining traditional elements. The result will be an attractive and characterful addition that is of architectural merit which will be an enhancement to the Conservation Area with a modern addition that reflects the surrounding in a sympathetic way.
25. The use of red brick and flint to complement the warming house, garden walls and flint 'folly' is a welcome feature for the proposal. Provided that the materials selected are of the highest quality and contextual, the proposal has the potential to enhance the setting of the Conservation Area. Conditions to include:
- Samples to be viewed on site of the proposed external materials
 - Sample panels of flint work and brick work (including bond, mortar, colour and profile)
 - Details of the soffits, verges and gables
 - RAL colour of all metal work including the windows, doors and rainwater goods
26. Conclusion: It is considered that the proposals presented in this planning application, offer a level of harm to the overall significance of the Conservation Area. The level of harm offered is assessed as being less than substantial, the level of harm is considered to be mitigated by constructing a well-designed dwelling that is appropriate and considerate to the Conservation Area.
27. It is therefore considered that the proposal, with these suggested conditions, would satisfy the requirements of Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended; Chapter 16 of the National Planning Policy Framework (NPPF); and Policies DM1, DM3 and DM9 of the Norwich Local Plan (Development Management Policies 2014).

Citywide Services

28. I have no concerns from Citywide Services, as long as the refuse bins are stored on the properties outside of collection and presented on the edge of the property boundary beside the highway on collections days.

Ecology (Norwich City Council)

29. The report discusses a Preliminary Bat Roost Assessment (PRA) which they undertook in March 2023, together with a dusk emergence survey on 4 May 2023. Externally, a number of potential roosting features were identified again, but no bat evidence was found in association with these features. The dwelling

remains as "low potential" for roosting bats. The garage remains as "negligible".

30. Within the site pipistrelle bats and a long-eared bat were identified as foraging. The report advises that no further survey work in relation to bats is considered necessary prior to works commencing.

31. Neither report discusses BNG. In order to achieve this a good landscaping scheme benefiting wildlife is required. Please note that the PEA includes several recommendations relating to landscape. These recommendations should form the basis of the detailed development in order to achieve BNG. Retention of T19 would be supported. Any trees to be removed should be replaced.

32. Please can the following conditions be added:

- Bird Nesting Season
- Mitigation Details
- Recommendations in section 4 of the PEA and section 5 of the bat survey: 1 Integral Swift box, 3 integral bat boxes and a hedgehog house
- Small mammal access
- Landscaping Details - Minor Scheme
- Informative: Protected Species

Environmental Protection (Norwich City Council)

33. I have reviewed the Survey. Can a condition be added, I suggest the following:

34. All asbestos containing materials documented within the survey report dated 20/1/22 are removed in accordance with standard procedure and supported by appropriate risk assessments, these shall be documented within the construction, demolition management plan.

Highways (local highways authority) (Norfolk County Council)

35. Thank you for consulting with the highway authority and facilitating dialogue with previous applications for this site that have secured suitable improvements to layout.

36. The proposal is acceptable in principle.

37. Church Avenue East is a privately owned and maintained road, so the highway concern would be the need for vehicles associated with this site to be able to enter the highway at its junction with Christchurch Road in a forward gear, which is now achievable given the provision of a suitable turning space within the site.

38. In terms of the site layout as proposed this now demonstrates a satisfactory layout for vehicular access for cars and larger vehicles, including fire trucks. Whilst parking spaces are not shown, there is garage provision and there should be sufficient space for cars to park within the site, your authority may wish to verify that is the case (2.5m x 5m for each space with 6m to reverse and turn around).

39. The applicant has not specified materials for the site access road or the parking/turning spaces, your authority may wish to query this to ensure there is suitable landscaping.
40. There is no vehicle crossover or drainage specified in the submitted plans, it is standard practice that the first 5m back from the carriageway edge is hard surfaced with suitable drainage to a soakaway at the site boundary or equivalent provision.
41. The site access route should be sufficiently strong for larger vehicles such as fire trucks which normally use gravel in a geogrid on a suitable sub base for drainage.
42. Should your Authority be minded to approve the application I would be grateful for the inclusion of the following conditions on any consent notice issued;-
- Garage minimum internal dimensions measuring 3 metres x 7 metres
 - EV charging and site layout completed prior to the first occupation

Lead Local Flood Authority

43. The Local Planning Authority would be responsible for assessing the suitability for any surface water drainage proposal for minor development in line with National Planning Policy Framework (NPPF).

Tree Protection Officer (Norwich City Council)

44. No objections from an arboricultural perspective. Condition TR7 - works on site in accordance with AIA/AMS/TPP, is recommended.

Assessment of Planning Considerations

Relevant Development Plan Policies

45. Greater Norwich Local Plan (GNLP) March 2024

- GNLP2 Sustainable Communities
- GNLP3 Environmental Protection and Enhancement
- GNLP5 Homes

46. Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

- DM1 Achieving and delivering sustainable development
- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design
- DM6 Protecting and enhancing the natural environment
- DM7 Trees and development
- DM9 Safeguarding Norwich's heritage
- DM11 Protecting against environmental hazards
- DM12 Ensuring well-planned housing development
- DM28 Encouraging sustainable travel
- DM30 Access and highway safety

- DM31 Car parking and servicing

Other material considerations

47. Relevant sections of the National Planning Policy Framework December 2023 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF4 Decision-making
- NPPF5 Delivering a sufficient supply of homes
- NPPF9 Promoting sustainable transport
- NPPF12 Achieving well-designed places
- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF15 Conserving and enhancing the natural environment
- NPPF16 Conserving and enhancing the historic environment

48. Supplementary Planning Documents (SPD)

- Landscape and trees SPD adopted June 2016

49. Advice Notes and Guidance

- Water efficiency advice note October 2015
- Internal space standards information note March 2015

Case Assessment

50. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Policy Framework (NPPF), the council's standing duties, other policy documents and guidance detailed above, and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

Main Issue 1. Principle of development

51. Key policies and NPPF paragraphs – GNLP5, DM12, NPPF paragraphs 11, 60, 72
52. It is proposed to demolish and replace the existing dwelling. Subject to the considerations below, this is acceptable in principle and does not raise any policy conflicts.

Main Issue 2. Design

53. Key policies and NPPF paragraphs – GNLP 2.5, DM3, NPPF paragraphs 131-140
54. The siting and orientation of the dwelling within the large site follows that of the existing for reasons explained in the Heritage section below.

55. In scale, the dwelling would be larger, replacing the original pair of modest workers cottages with a more substantial dwelling to meet modern standards. The footprint is approximately 90 square metres larger and the highest ridge of the roof would be 2.3 metres above the existing. Within the extensive site, the larger dwelling would still occupy a relatively small proportion and it is considered to be proportionate in scale to its immediate setting. It would be approximately 0.7 metres lower than the low pitched roof over the three storey townhouses at Beechbank, so no higher than this closest neighbouring building (albeit with one less storey).
56. Representations have raised concern about the total height, steep pitch of the roof and potential use of attic space. The increase in height is partly due to raising the floor level 0.65 metres to mitigate the risk of surface water flooding entering the dwelling and the ground floor ceiling height would be increased to modern standards. This accounts for approximately 1 metre of the increase and the insulated roof construction itself is approximately 0.5 metre deep.
57. At 45 degrees, the roof pitch is reasonably steep and more so than the existing 32 degree pitch. A previous submission proposed a lower, curved roof form which was incongruous to the character of the Conservation Area. The pitch of the roof forms and strong gable features now proposed are considered to be a positive response to the historic building forms which characterise the area. Lessening the pitch as suggested in some representations would not significantly reduce the overall height and could compromise the design quality.
58. Space over the stairwell would extend up to the roof, but other than this the roof space has no proposed use or accommodation within it and no windows or rooflights are proposed to it. It is a large volume by virtue of the pitch and any future proposals for external alterations to facilitate additional accommodation can be managed by removing permitted development rights.
59. Subject to the amenity impacts considered below, the height of the dwelling is not considered to be excessively or unnecessarily high and a reasonably steep pitched roof over a two storey building is appropriate to the area.
60. As well as responding well to the character of the area, the gabled roof forms create a traditional building envelope with an otherwise more contemporary treatment with the wraparound cladding and large areas of glazing. The two front gables projecting out at an angle maximise solar gain, whilst also adding visual interest, addressing the entrance into the site and creating some reference to the original pair of cottages. The palette of materials would complement the mix of old and new by integrating flint and red brick with the sleeker cladding and render. The altered forcing house and new garage would appear as subservient ancillary buildings complementing the host dwelling.
61. The existing hardsurfaced driveway extends across the front of the forcing house and dwelling. This route would be altered and extended to provide the necessary space for fire appliances to enter and turn within the site in compliance with Building Regulations. Increasing the hardsurfaced area is regrettable but the existing asphalt surface is inappropriate to the verdant and domestic character so there is an opportunity to replace this with a higher quality finish that is permeable to enhance the appearance and performance of this essential infrastructure. Full details of this and any other hardsurfacing, as well as additional soft landscaping to integrate the dwelling into the retained mature garden, can be agreed by condition.

62. It has been suggested that the design has an industrial or commercial character and is not in keeping with the Conservation Area. It is acknowledged that the scale would be large but the design ensures this maintains a residential character, as does the retention of large garden spaces around the buildings which it would not over-dominate. The gabled roof forms and inclusion of red brick and flint within the material palette are considered to sympathetically reflect the character of the Conservation Area within a high quality design approach that would represent a contemporary new addition to the area. The impact of this development on the Conservation Area is considered further below, but in design terms it is considered to be an acceptable design response to the site and its setting.

Main Issue 3. Heritage

63. Key policies and NPPF paragraphs – GNLP3, DM9, NPPF paragraphs 195-214

64. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on the local authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law (specifically *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014]) has held that this means that considerable importance and weight must be given to the desirability of preserving the setting of listed buildings and conservation areas when carrying out the balancing exercise.

65. A Heritage Impact Assessment sets out the known history of the site. The nineteenth century cottages are understood to have been occupied by horticultural workers employed at a neighbouring estate. The forcing house is the only surviving building associated with the cultivation of the land, but there were once also greenhouses and cold frames. It was the land immediately to the front of the cottages which was associated with this use, and the walled kitchen garden to the rear was separate and associated with The Cedars. This area retains much of its character as a walled kitchen garden although the mid-nineteenth century wall has been subject to some unsympathetic repairs. The folly along the northeast boundary of this part of the site is of a similar date and remains associated with The Cedars. Its presence on the boundary contributes to the heritage value of the site.

66. Although neither the application site itself nor the folly feature on the local list, they are considered to have sufficient heritage value to be considered non-designated heritage assets and the application must be assessed accordingly in relation to Policy DM9 and section 16 of the NPPF.

67. The existing dwelling has been subject to unsympathetic alterations and extensions over its lifetime, has a low floor level at risk of surface water flooding and it is not in a condition to support a high standard of modern living. On balance it is not of such significance that its loss should be resisted and the proposal offers an opportunity to replace it with a better performing dwelling that respects the heritage of the site and can make a positive contribution in the longer term.

68. The retention of the forcing house as an ancillary building and the removal of an unsympathetic extension from it is welcomed to help conserve this historic building which provides clear evidence of the original use of the land.
69. Unlike an earlier proposal, the footprint and orientation would reflect those of the existing dwelling and the historic kitchen garden space at the rear would remain open. This is considered to respect the history of the site by retaining the legibility of the previously separate parcels of land and not encroaching into the historically open kitchen garden space or the setting of the folly. Representations have suggested the dwelling could be sited elsewhere within the larger plot, however there are heritage benefits to retaining the approximate position and orientation of the existing.
70. Although the original pair of cottages would be lost as part of the development, it is considered that the proposed development conserves the historic interest of the site in its layout, materiality and retention of forcing house. It would also not result in direct or indirect harm to the folly. The impact on the significance of these non-designated heritage assets is considered to be outweighed by the benefits of redeveloping a new dwelling fit for the future with a high design quality.
71. The loss of the original cottages and replacement with a larger dwelling would have some impact on the Newmarket Road Conservation Area it is within and the Unthank and Christchurch Conservation Area from which it would be seen in some limited views. This harm is considered to be less than substantial in scale and outweighed by the high quality new dwelling. The proposal is therefore acceptable in heritage terms.

Main Issue 4. Amenity

72. Key policies and NPPF paragraphs – GNLP5, DM2, DM11, NPPF paragraphs 8 and 135.

Future occupiers

73. The new dwelling would generously exceed minimum space standards. All the habitable rooms would receive adequate natural light and enjoy a pleasant outlook. The garden spaces are also generous and in keeping with those in the wider area.
74. Level access is integral to the design with a ramp to the raised floor level and a ground floor bedroom with en suite sized for accessibility.

Neighbouring occupiers

75. The representations received include concerns about the siting, scale and particularly height of the dwelling resulting in oppressing and overbearing impacts on neighbours.
76. As acknowledged above, there is an increase in scale that will have a greater impact than the existing dwelling. The closest neighbouring dwellings at Beechbank are those most likely to be affected by this change and representations have raised concern that there is insufficient information upon which to assess these impacts and determine the application.

77. A daylight and sunlight assessment considers the impact on the closest neighbouring dwelling at Beechbank. In accordance with Building Research Establishment guidance, this assesses the 'vertical sky component' (general amount of light available on the outside plane of the window as a proportion of the amount of total unobstructed sky viewable). It concludes that all potentially affected windows would retain at least 95.66% of their existing values. This is well above the 80% which would indicate a noticeable adverse impact.
78. It is not therefore considered the closest neighbouring dwellings along Beechbank would suffer any unacceptable loss of light or overshadowing to their windows. Nor is it considered that the carport and external space to the front would lose light to any unacceptable extent and the private garden to the rear that would be unaffected. As this assessment demonstrates that the closest dwelling would not be unacceptably affected, it can be concluded there would be no unacceptable loss of light or overshadowing to any other neighbouring dwellings.
79. In terms of oppressing and overbearing impacts, it is appreciated that the greater scale would increase the presence of the dwelling perceived from Beechbank both within and outside the dwellings. One representation includes a sketch of where neighbours believe the height of the dwelling would be in the view from Beechbank. In response, the architect has produced an image based on a 3D model of the proposal which shows the view down Beechbank towards the site. This demonstrates that it would be clearly visible from the roadway on Beechbank and thus also from the windows of dwellings along it. When the trees along the boundary are in leaf, there would be some screening and softening of the view and it is appreciated the impact would be greater in winter.
80. Consultation on this image has generated further representations. These raise concern about the accuracy of the image and how the proposed materials are presented. As it has been based on the architect's model of the proposal it is considered to be more accurate than the sketch submitted by a neighbour but importantly it does not significantly differ from the scale estimated in that sketch. As an additional image to supplement the elevation and drawings, it is considered that all together there is sufficient, accurate information on which to assess and determine the application. The image shows the mix of metal cladding and light coloured render consistent with the proposed materials indicated on the elevation drawings, so there is no inconsistency.
81. The representations also reinforce the previous comments that these neighbours consider the dwelling would create a dominating and detrimental impact in views from Beechbank, including from within the dwellings.
82. Having reviewed the representative image, elevations and plans, the distance of over 11 metres between the dwellings at the nearest point, as well as the oblique angles from windows, is considered sufficient to mitigate any overbearing presence within the dwellings and the views on and around Beechbank are not considered to be oppressive, significantly detrimental or unacceptably harmful.
83. One representation has raised concern about a loss of evening light to the east. In response, shadow studies at the spring equinox, summer solstice

and winter solstice have been submitted. These show existing mature trees within the neighbouring site to the west cause shadowing on and around the site. The impact of the proposal has been assessed with and without these trees. With the trees remaining as proposed, there would be no additional overshadowing. Even if these were removed, the additional overshadowing shown is very modest and unlikely to have any unacceptable loss of light. The trees are within the control of the neighbouring property and subject to Conservation Area and TPO protection. It is not therefore considered the proposal would result in any unacceptable overshadowing or loss of light to the east.

84. Representations have mentioned the visual impact from neighbouring dwellings and loss of existing views. There is no right to a private view and whilst it is acknowledged views would change, it is not considered that the proposal would unacceptably harm the amenity gained from outlook for neighbouring occupiers.
85. In terms of overlooking, the west facing side of the projecting front gables, would have first floor windows facing towards Beechbank. On the closest of these two projections, there would be one bathroom and two narrow bedroom windows and on the farthest there would be one to a landing and another to a bedroom. By virtue of the distance, angles, size of openings and use of rooms, it is not considered these would result in any direct or unacceptable overlooking or loss of privacy. The ash tree at the end of Beechbank also filters views. All bathroom and en suite windows would be obscure glazed and this can be secured by condition.
86. The distance, angles and existing tree screening are considered sufficient to mitigate any unacceptable impact on the neighbouring dwellings to the southwest on Church Avenue East, north off Unthank Road and east at The Cedars.
87. The site plan includes an indicative position for an air source heat pump at the northwestern end of the rear elevation. It is proposed to agree the exact location and specification by condition, and this shall be necessary to ensure there would be no adverse noise or other impacts on neighbouring occupiers.
88. A construction method statement should be agreed by condition to ensure the timing and methods of demolition and construction protect the amenity of neighbouring occupiers.
89. It is acknowledged that the larger dwelling would have a greater impact than the existing. Officers are satisfied the submitted plans, drawings and assessments provide sufficient information to make an accurate and robust appraisal of the proposal and its impacts upon neighbouring occupiers and the surrounding area. Whilst having a more prominent presence from Beechbank, it is not considered the replacement dwelling would result in any overshadowing, loss of light, oppressing, overbearing, overlooking or loss of privacy that would individually or cumulatively result in harm to the amenity of neighbouring occupiers that is unacceptable or contrary to Policy DM2.

Main Issue 5. Transport

90. Key policies and NPPF paragraphs – GNLP2, DM28, DM30, DM31, NPPF paragraphs 8, 114-117

91. The existing driveway would be altered to provide sufficient space for fire engines and larger vehicles to turn within the site. A new permeable resin spray shingle finish is proposed for the driveway and the construction and finish of this should be agreed by condition to ensure it can withstand larger vehicles, does not contribute to surface water flood risk and is visually appropriate to the site.
92. The garage would provide parking for at least one car and cycles. EV charging would be powered by the solar panels proposed to the roof and the building would also house plant.
93. The Highway Authority are satisfied with the proposal and have recommended conditions.
94. A dedicated refuse storage area is proposed. Collection would be from Church Avenue East as existing.

Main Issue 6. Flood risk

95. Key policies and NPPF paragraphs – GNLP2.8, DM5, NPPF paragraphs 165-175.
96. There is a risk of surface water flooding around the footprint of the existing dwelling and western part of the site.
97. The NPPF and Local Lead Flood Authority (LLFA) standing advice direct new development to areas at the lowest risk of flooding. Within this site, the dwelling could be located in a lower risk area. However, there are considered to be over-riding heritage, design and amenity reasons for retaining the dwelling in the area of the existing. The siting is therefore not unacceptable in this respect, providing the on and off site risks can be satisfactorily mitigated.
98. To mitigate the risk of internal flooding, the ground floor level is proposed to be raised 375mm above the predicted 0.1% event flood level which accords with Local Lead Flood Authority standing advice. As the footprint of this dwelling would be larger than the existing, it would occupy areas which would currently flood and could displace this water, increasing flood risk off-site. In order to mitigate this, ground levels north of the dwelling are proposed to be reduced approximately 120mm to retain a permeable area for water to dissipate through.
99. Within the forcing house and garage, any electrics would be a minimum of 600mm above the floor level. These measures are appropriate to make these ancillary buildings resilient to flooding.
100. As the access and external space around the dwelling could be covered in flood water, it is considered necessary for a flood response plan to be agreed by condition so all future occupiers are prepared for this risk.
101. To ensure that the additional run-off from the roof and any impermeable external surfaces does not contribute to the risk of surface water flooding, it shall be necessary to agree a surface water drainage scheme by condition. Rainwater butts are proposed to the garage for use in the garden and this will help attenuate some run-off.

102. Subject to conditions, the proposal is acceptable with regards flood risk.

Main Issue 7. Trees

103. Key policies and NPPF paragraphs – GNLP3, DM7, NPPF paragraphs 180 and 186.

104. Within the site, one dead fruit tree and one mixed group of shrubs are proposed to be removed to facilitate development. A holly tree on the southwestern boundary may also be removed, subject to investigating how an adjacent decommissioned septic tank affects it. The applicants intend to retain it if the new garage construction would not affect it to any greater extent than the existing tank.

105. The proposal could also potentially affect trees outside the site, particularly the ash tree on the boundary with Beechbank and a sycamore within the garden of a dwelling off Unthank Road. Representations have highlighted the importance of the ash tree which provides a pleasant outlook to dwellings along Beechbank and in views along the road, it also provides some visual screening and filters views between the application site and Beechbank to protect amenity. There is concern that this tree could be affected by construction activities, loss of light and a reduction in water.

106. Tree protection fencing and ground protection are proposed within the site to protect these and others throughout construction.

107. The Tree Protection Officer has been closely involved in the considerations of proposals here, including by visiting neighbours. They are satisfied that the proposed protection measures are appropriate to protect the trees retained within and around the site and that the proposal is acceptable in arboricultural terms subject to a conditions securing the proposed protection measures.

Main Issue 8. Biodiversity

108. Key policies and NPPF paragraphs – GNLP3, DM6, NPPF paragraph 8, 180, 186-188.

109. A Preliminary Ecological Appraisal Survey dated September 2021 did not find any evidence of protected species but identified some suitable bat roosting features in the existing dwelling.

110. A new survey was undertaken in March 2023 followed by a dusk emergence survey in May. These confirmed there were no bats roosting and the nocturnal survey recorded two bats foraging in the garden and one flew past the site. No nesting birds were encountered.

111. The report recommends that the dwelling has bat boxes built into each gable with a swift box under the eaves on the south elevation to enhance opportunities for bats and birds.

112. These measures are welcome to mitigate the loss of existing bat roosting features, however it is considered necessary to incorporate additional measures to offer enhancement and there is ample opportunity within the site to do so. Additional enhancement measures and also a soft landscaping

scheme to enhance biodiversity interest and replace trees to be removed shall therefore need to be agreed by condition.

113. The timing of works outside the bird nesting season, compliance with recommended mitigation measures and provision of small mammal access in new boundary treatments should also be secured by condition.

Main Issue 9. Nutrient Neutrality

Site Affected: (a) Broads SAC/Broadland Ramsar
(b) River Wensum SAC

Potential effect: (a) Increased nitrogen and phosphorus loading
(b) Increased phosphorous loading

The application represents a 'proposal or project' under the above regulations. Before deciding whether approval can be granted, the Council as a competent authority must undertake an appropriate assessment to determine whether or not the proposal is likely, either on its own or in combination with other projects, to have any likely significant effects upon the Broads SAC, and if so, whether or not those effects can be mitigated against.

The Council's assessment is set out below and is based on advice contained in the letter from Natural England to LPA Chief Executives and Heads of Planning dated 16th March 2022.

- (a) Broads SAC/Broadland Ramsar
- i. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
 - ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer: NO

The proposal is to replace an existing dwelling and will not impact upon the average occupancy figures for dwellings across the catchment and will therefore not impact upon water quality in the SAC.

Conclusion: It is not necessary to carry out an assessment under the Habitats regs.

- (b) River Wensum SAC

- i. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
- ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer: NO

The proposal is to replace an existing dwelling and will not impact upon the average occupancy figures for dwellings across the catchment and will therefore

not impact upon water quality in the SAC. In addition, the discharge for WwTW is downstream of the SAC.

114. Conclusion: It is not necessary to carry out an assessment

Compliance with other relevant development plan policies

115. A number of development plan policies include key targets for matters such as parking provision and energy efficiency. The table below indicates the outcome of the officer assessment in relation to these matters.

Requirement	Relevant policy	Compliance
Refuse storage/servicing	DM31	Yes subject to condition
Energy efficiency	DM3, GNLP 2.10	The drawings indicate solar panels and air source heat pumps. The precise details, including noise impacts, should be agreed by condition.
Water efficiency	GNLP 2.9	Yes subject to condition
Sustainable urban drainage	DM3 & DM5, GNLP 2.8	Yes subject to condition. The new areas of driveway are proposed to have a permeable surface.
Contamination	DM11, GNLP 2.7	A survey identifies asbestos containing materials in the existing dwelling. The appropriate removal of these during demolition can be secured by condition.
Technology based services	GNLP2.2	Provision of high speed internet and EV charging prior to first occupation can be secured by condition.

Equalities and diversity issues

116. There are no equality or diversity issues.

Local finance considerations

117. Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are defined as a government grant or the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority.

118. In this case local finance considerations are/are not considered to be material to the case.

Human Rights Act 1998

119. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to approve this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and

freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

120. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to grant planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

121. The application proposes replacing an historic dwelling within a site which has features of heritage interest with a contemporary style new dwelling on a larger footprint and with greater height.

122. There is no objection to the principle. Whilst the original building would be lost, it is considered that the siting, orientation, site layout and incorporation of the refurbished forcing house retains sufficiently legibility of the historic significance of the site. The design, form and materials of the dwelling blend a contemporary approach with references to characteristic features of historic dwellings considered appropriate to the Conservation Area.

123. It is acknowledged that there is significant local concern about the scale of the replacement and impact this would have on the surrounding character and amenity of neighbouring occupiers. The scale of the dwelling is considered proportionate to the site and not out of character for the Newmarket Road Conservation Area. It would be more visible in views down Beechbank and from windows in the dwellings along it than the existing dwelling and therefore have a greater impact. However, it is not considered any visual or amenity impacts would be so significant as to unacceptably harm local character, public views, the Unthank and Christchurch Conservation Area and amenity of neighbouring occupiers.

124. It is not considered there would be any other impacts that cannot be satisfactorily resolved by the conditions listed below.

125. The development is therefore in accordance with the requirements of the National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

Recommendation

126. To approve application 22/01417/F – End House, Church Avenue East and grant planning permission subject to the following conditions:

1. Standard time limit;
2. In accordance with plans;
3. Construction management plan;
4. Bird Nesting Season;
5. Compliance with ecological mitigation measures;

6. Works on site in accordance with arboricultural impact assessment, method statement and tree protection plan;
7. External material details, including samples, flint and brickwork panels, soffit, verge and gable details and all metalwork colours to be agreed;
8. Landscape scheme to be agreed;
9. Surface water drainage scheme to be agreed;
10. Details of solar PV and air source heat pump, including noise, to be agreed;
11. Biodiversity enhancements to be agreed;
12. Parking, access, turning space, cycle storage, bin storage and EV charging completed prior to first occupation;
13. Flood resilience measures;
14. Flood response plan prior to first occupation;
15. Small mammal access in new boundary treatments;
16. Minimum floor level of 29.51m AOD;
17. Bathroom and en suite windows to be obscure glazed;
18. Water efficiency;
19. High speed internet;
20. Garage provided and retained for car parking;
21. Removed permitted development rights for roof extensions and alterations.

Informative notes:

Protected Species
Asbestos

Appendices: None

Contact officer: Planner

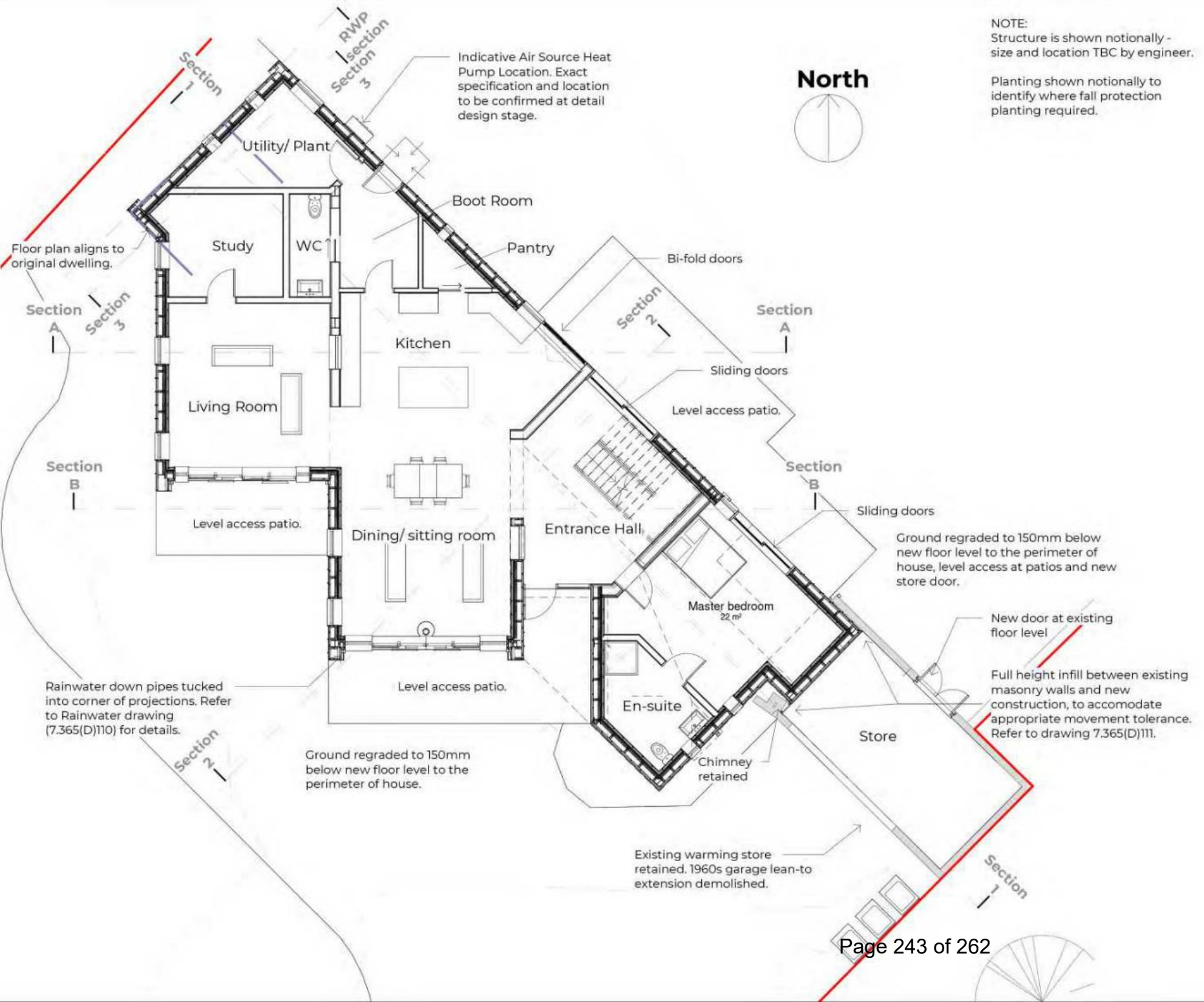
Name: Maria Hammond

Telephone number: 01603 989396

Email address: mariahammond@norwich.gov.uk



If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

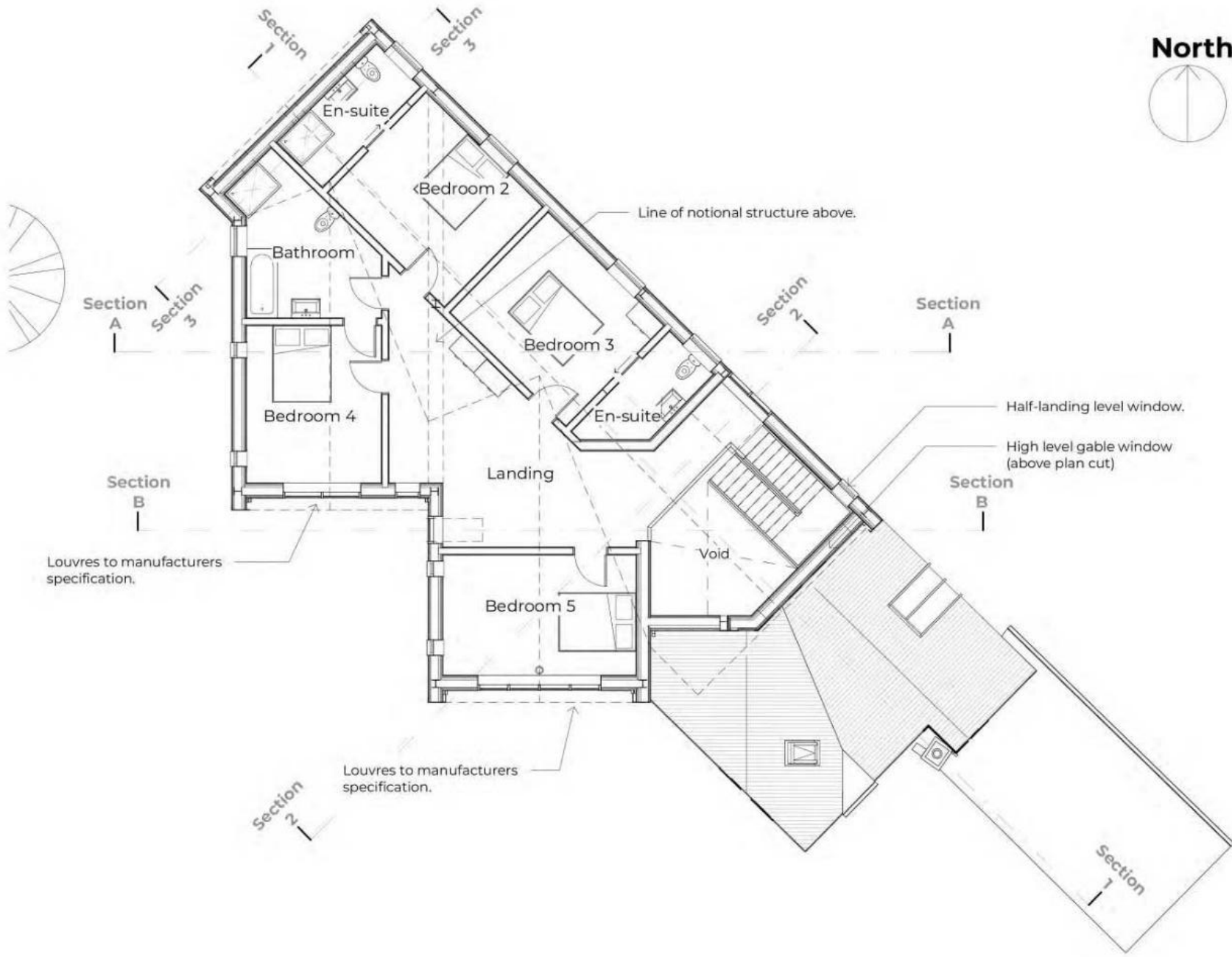


NOTE:
Structure is shown notionally - size and location TBC by engineer.

Planting shown notionally to identify where fall protection planting required.

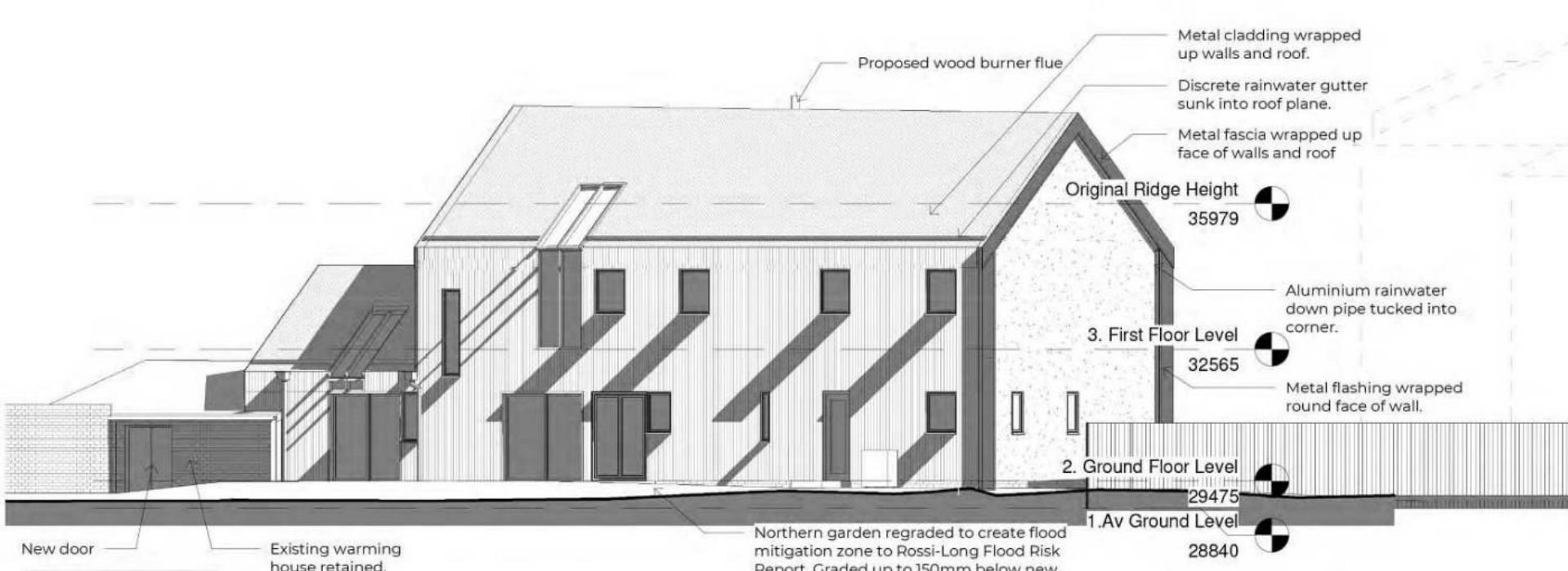
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Revisions:	No.:	Date:	Item:
Job no:			Job name:
7.365			End House
Drawing name:			Drawing no.:
Proposed Ground Floor Plans			7.365 (D) 102
PLANNING DRAWING			Scale:
Date:			1:100@A3
11/10/2022			Initial:
			KM
			Rev.:

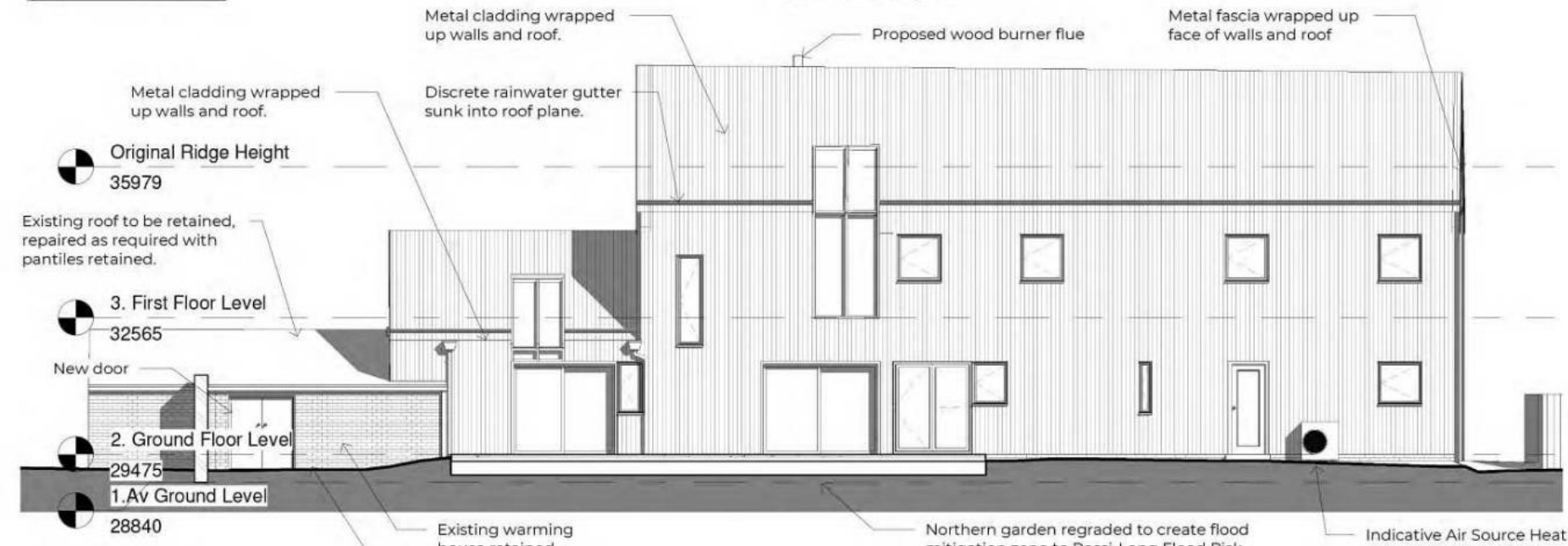


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Revisions:	No:	Date:	Item:
Job no:		Job name:	
7365		End House	
Drawing name:			
Proposed First Floor Plan			
PLANNING DRAWING			
Date:	Scale:	Drawing no.:	Initial:
11/10/2022	1:100@A3	7365 (D) 103	KM



North elevation



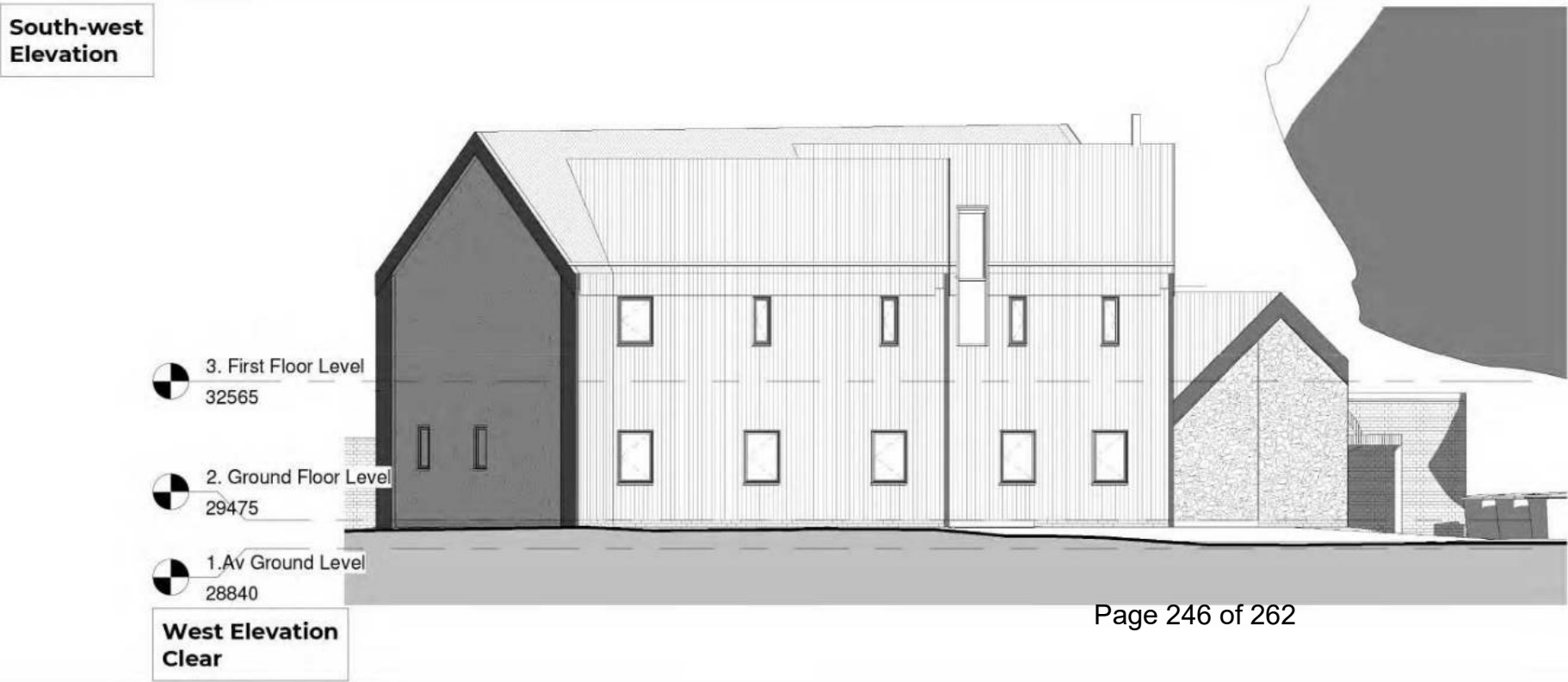
NorthEast elevation

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Revisions:	No.:	Date:	Item:
Job no:		Job name:	
7365		End House	
Drawing name:		Scale:	
Proposed North Elevations		1:100@A3	
PLANNING DRAWING		Date:	
		11/10/2022	
Drawing no.:		Rev.:	
7365 (D) 104		KM	



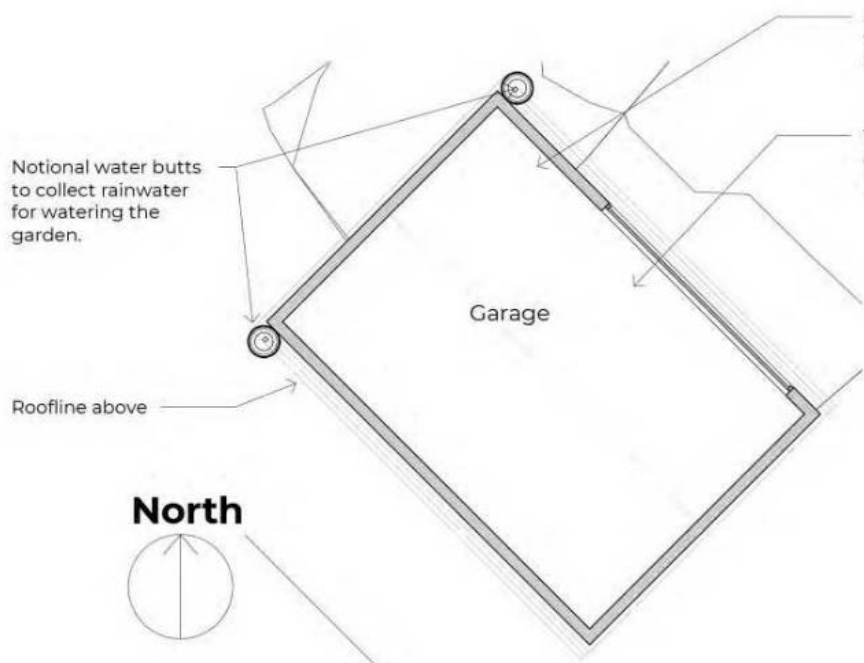
**South-west
Elevation**



**West Elevation
Clear**

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Revisions:	No.:	Date:	Item:	Job no:	Job name:	Initial:
				7365	End House	KM
Drawing name:		Date:	Scale:	Drawing no.:	Rev.:	
Proposed South-west Elevation		11/10/2022	1:100@A3	7365 (D) 10B		
PLANNING DRAWING						
LBR ARCHITECTURE						
ARB						
A multi award winning practice						
100% RIBA #1						
100% RIBA #1						
100% RIBA #1						



2.2 Garage Floor Plan

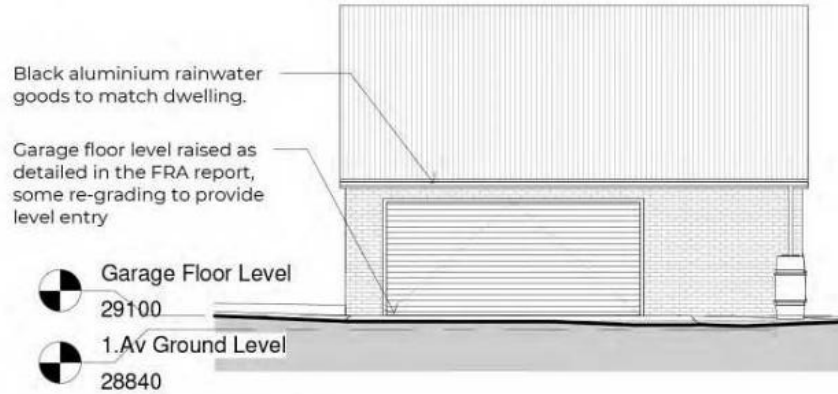
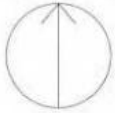
Space for plant associated with PV panels, or similar, as required.

Two car garage, with electric vehicle charging point.

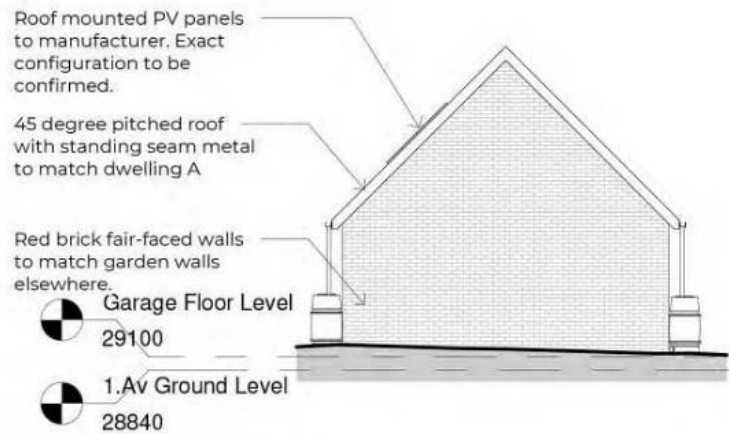
Notional water butts to collect rainwater for watering the garden.

Roofline above

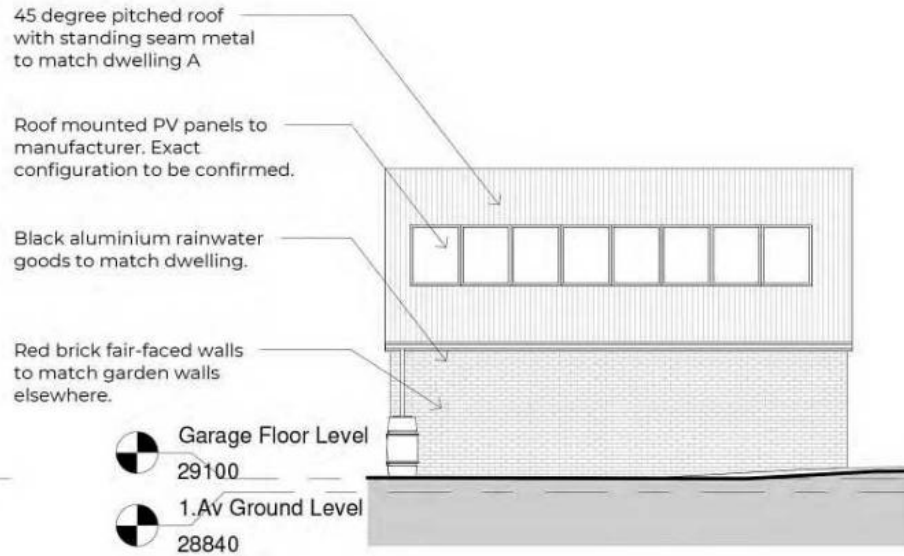
North



Garage North-East Elevation



Garage South East Elevation



Garage South West Elevation

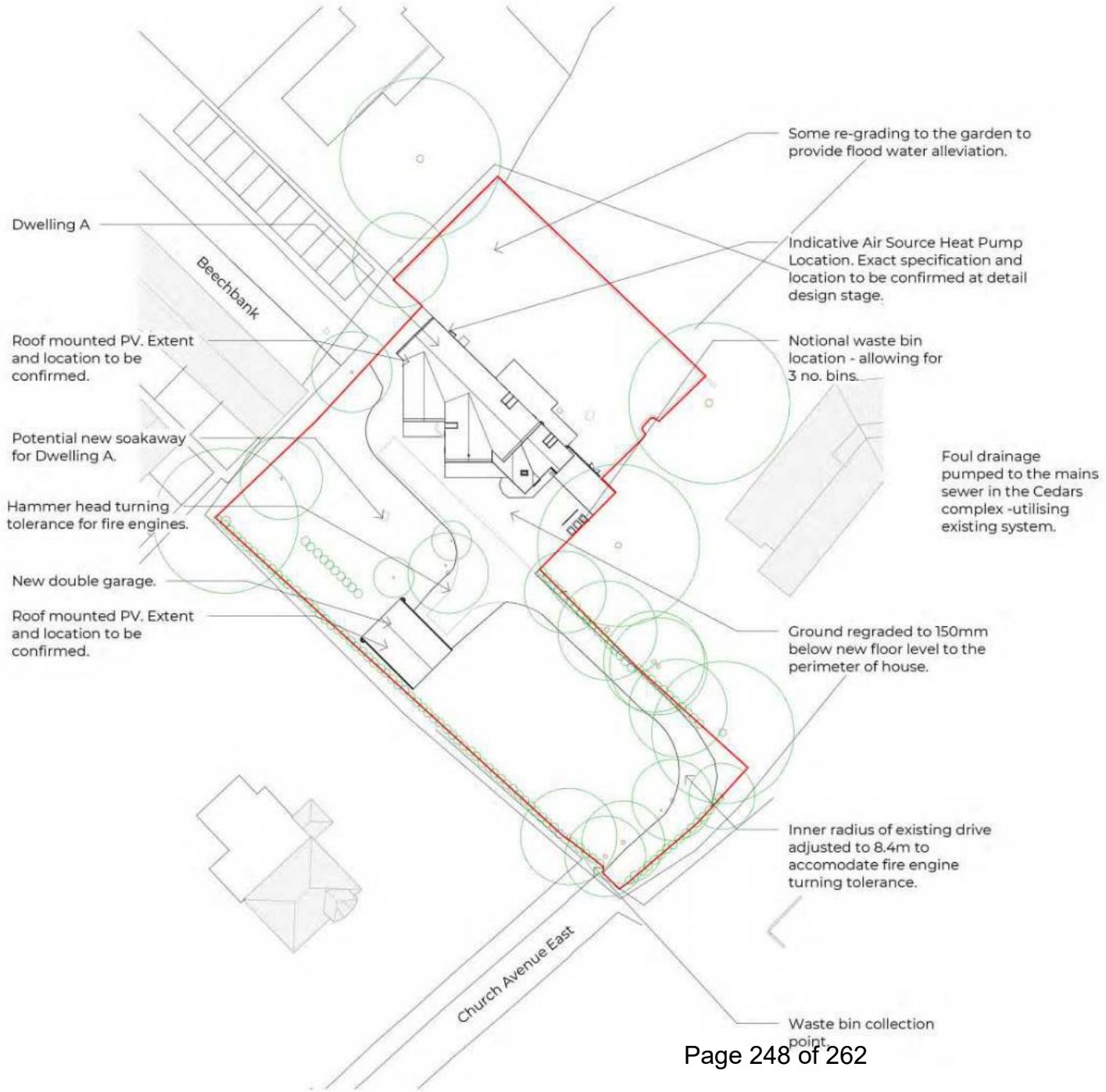
Revisions: A No: 02/11/2022 Item: Floor level adjusted; annotation for plant allowance added.

Job no:	7365	Job name:	End House
Date:	02/11/2022	Drawing name:	Proposed Garage - dwelling A
Scale:	1:100@A3	Drawing no.:	7365 (D) 109
Initial:	KM	Rev.:	A

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North



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Revisions: B No: 13/11/2023 Date: 13/11/2023 Item: Existing dwelling position removed for clarity; site boundary corrected.

Job no: 7365		Job name: End House	
Drawing name: Proposed Block Site plan		Drawing no: 7365 (D) 101	
Date: 13/11/2023		Scale: 1:500@A3	
Initial: KM		Rev: B	



Committee name: Planning applications

Committee date: 21/03/2024

Report title: Application no 23/01620/F 25 Hill House Road, Norwich

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

To determine:

Application no: 23/01620/F

Site Address: 25 Hill House Road NR1 4BE

Decision due by: 29/03/2024

Proposal: Alterations to loft conversion (Retrospective)

Key considerations: Design; Amenity

Ward: Thorpe Hamlet

Case Officer: Matthew Hickie

Applicant/agent: Mrs Louise Robinson

Reason at Committee: Called in by Cllr Joshua Worley

Recommendation:

It is recommended to approve the application for the reasons given in the report and subject to the planning conditions set out in paragraph 41 of this report, and grant planning permission.



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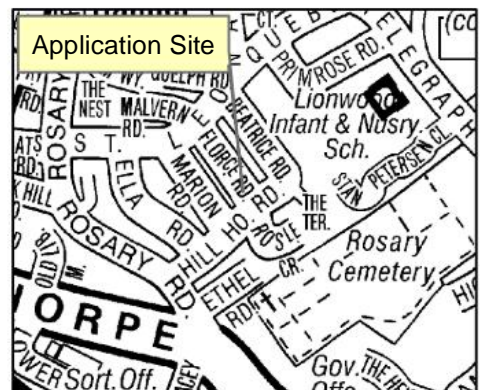
Planning Application No 23/01620/F
Site Address 25 Hill House Road

Scale 1:500



NORWICH
City Council

PLANNING SERVICES



The site and surroundings

1. Hill House Road is residential street situated north off Rosary Road in the Thorpe Hamlet ward. The property in question is situated on the terrace row between Florence Road and Marion Road.
2. The existing property is a two storey Victorian terrace house.
3. In the vicinity, in addition to residential dwellings there are a small number of pubs, residential care homes, and a children's playground on Marion Road. To the north of the site is Lionwood Infant and Nursery School, and to the east, Rosary Cemetery. There are some other local businesses distributed around adjacent streets, but the area is primarily characterised by residential properties.
4. Houses on this street do not have off street parking, however parking is available on both sides of the road.
5. Properties have small front paths and a small area of front garden or yard space; the uses of which vary from house to house between garden planting and bin storage.
6. Properties in the vicinity are primarily constructed using red brick with a constructed lintel and structural pillars surrounding the door. Roof types on this terrace vary between pantiles and flat tiling.
7. As this street is on an incline, each roof is stepped up between each property, with central shared chimneys positioned across the boundaries of every two houses.
8. Properties on this street have small rear yards accessible from the rear of the property.

Constraints

9. No Constraints

Relevant Planning History

10. The records held by the city council show the following planning history for the site.

Case no	Proposal	Decision	Date
23/00416/F	Single storey rear extension and loft conversion.	Approve	19.07.2023

The Proposal

11. The proposal is for a loft conversion with dormer window, and a single storey rear extension. This application was submitted following enforcement investigation into the increase in size of the dormer approved in application 23/00416/F.
12. The plans show the dormer to extend vertically from the existing roof line by 2.7m and extending to meet the rear elevation of the existing roof line.

13. The original ridge line of the roof is to be increased, allowing for the dormer to match the maximum height of the roof. This is set to increase the overall roof height by no more than 150mm.
14. The single storey rear extension will involve extending into the rear yard to the side of the building, extending to the point that would meet the gable end elevation of the first storey, approximately 4.8m in length. A gap would be retained between the extension and the boundary of 30 Florence Road. This rear extension would include the installation of a hipped edge roof light that would protrude upwards from the roof height. This will provide a new access door to the rear garden. A new rear window will additionally be installed on the existing rear elevation of the ground floor building.
15. Building materials will include for the rear extension, a combination of red brickwork and render. For the dormer the exterior will be constructed using a matching colour cladding to the main appearance of the building, with a flat roof. Windows will be installed with White UPVC to match the original.
16. The plans submitted in application 23/00416/F show the dormer roof situated approximately 108mm below the ridge line. The new proposal shows the ridge to have been raised, and the dormer roof to be in line with this new height. From measuring the plans this would equate to approximately 163mm increase in height overall. The plans show that this roof is on a slight pitch, which would decrease the height of the roof as it reaches to meet the rear wall.
17. The new plans show that the rear wall of the dormer will be extended outward by 100mm.

Consultation responses

18. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Representations

19. Adjacent and neighbouring properties have been notified in writing. 6 letters of representation have been received citing the issues as summarised in the table below:

Issues raised	Response
Dormer not in keeping with sympathetic design standards.	See Main Issue 1.
Dormer rear not set back the appropriate distance from the rear wall. (0.2m)	This condition is only a requirement when a dormer is being constructed without planning permission under permitted development regulations. A full planning application has been submitted in this case.
Loss of natural light.	See Main Issue 2.
Overbearing structure	See Main Issue 2.
No suggestion of enforcement following the increase in height.	An enforcement investigation was opened, and the applicant was encouraged to submit a full planning application reflecting the updated

Issues raised	Response
	design for consideration. All applications are determined on their merit regardless of whether construction has commenced.
Overlooking between properties.	See Main Issue 2.
Unsuitable building materials.	See Main Issue 1.
Negative precedent for future development practices.	All applications are determined on their individual merit.
Overcrowding of residents and parking constraints.	Not a material planning consideration for this form of development. Use of a property as a HMO up to and including 6 people (Use Class C4) is allowed without planning permission within permitted development rights.

Assessment of Planning Considerations

Relevant Development Plan Policies

20. Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)

- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design

21. Relevant sections of the National Planning Policy Framework 2023 (NPPF):

- NPPF8 Promoting healthy and safe communities
- NPPF12 Achieving well-designed places

Case Assessment

22. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Policy Framework (NPPF), the council's standing duties, other policy documents and guidance detailed above, and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

Main Issue 1. Design

23. Key policies and NPPF paragraphs – JCS2, DM3, NPPF paragraphs 131-141

24. The scale and form of the dormer is such that it has breached the height of the original ridge line on the property roof. Concern has been expressed by residents of the impact of this on the appearance and character of the neighbourhood. The plans have shown an additional ridge constructed that would incorporate the dormer roof with existing roof.

25. This constructed ridge uses a curved grey tiling similar in appearance to the corner ridging on 30 Florence Road.
26. Due to the nature of the inclined street and resultant stepped roof line, a part of the dormer roof line and wall is visible when looking up the street. There is no visibility of the construction when walking down the street, as this is covered by the chimney. From the front of the property, although the new ridge does protrude outward slightly from the original ridge position, the materials used are sympathetic in blending the extension and reducing the visual impact of the dormer when viewed from the front.
27. The height of the dormer approved in application 23/00416/F was approximately 150mm lower what has now been submitted, which in its construction would also be visible whilst looking up the road towards the property.
28. The precedent set from the approval of the dormer in application 23/00416/F, suggests that the overall form of the dormer is approvable in this context, given the small increase in height. The majority of this development will not be visible from the public realm, and the impact of a raised ridge line is considered minimal in design terms.
29. Cladding on the dormer walls will be used to match a similar style and colour to the existing building materials of the property.
30. The proposal also shows the dormer to extend in length to meet the line of the existing rear wall. Letters of representation have expressed that as the dormer does not allow a 200mm length distance from the eaves, this should be refused. This specific measurement refers to the requirements of a dormer construction being allowed without planning permission under permitted development rights. This can be allowed with a full planning application. As this would not be visible from the public realm, this impact of this increase in size is permissible.

Main Issue 2. Amenity

31. Key policies and NPPF paragraphs – DM2, DM11, NPPF paragraphs 8 and 127.
32. The amenity impacts of the proposed dormer should be considered in respect to the marginal impacts resulting from the increase in scale from the approved plans of application 23/00416/F.
33. The additional height of 163mm would cause a minor increase in amenity loss to neighbours in regard to overshadowing or loss of outlook. There may be some impact on reduced day light from overshadowing, however less impact on direct sunlight as the dormer and rooflights of the neighbour are on the northeast elevation of the building. There are concerns regarding loss of outlook from the rear roof light of 30 Florence Road, however, typically this is not the kind of window that one would use for outlook.
34. Concerns regarding loss of privacy and overlooking were addressed in application 23/00416/F by condition of obscure glazed windows on the rear of the dormer. This condition will be carried forward in the decision of this application. This is appropriate to apply as the left window (when facing the

rear elevation) will be used as a bathroom. The right window will be inaccessible to view out from as this will be above a staircase, and therefore not at eye level when using the stairs.

Main Issue 3. Nutrient Neutrality

- Site Affected: (a) Broads SAC/Broadland Ramsar
(b) River Wensum SAC
- Potential effect: (a) Increased nitrogen and phosphorus loading
(b) Increased phosphorous loading

The application represents a 'proposal or project' under the above regulations. Before deciding whether approval can be granted, the Council as a competent authority must undertake an appropriate assessment to determine whether or not the proposal is likely, either on its own or in combination with other projects, to have any likely significant effects upon the Broads SAC, and if so, whether or not those effects can be mitigated against.

The Council's assessment is set out below and is based on advice contained in the letter from Natural England to LPA Chief Executives and Heads of Planning dated 16th March 2022.

- (a) Broads SAC/Broadland Ramsar
- i. Does the plan or project create a source of water pollution or have an impact on water quality (eg. alters dilution)? AND
 - ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer: NO

The proposal is for works to an existing dwelling and will not impact upon the average occupancy figures for dwellings across the catchment and will therefore not impact upon water quality in the SAC.

Conclusion: It is not necessary to carry out an assessment under the Habitats regs.

- (b) River Wensum SAC
- i. Does the plan or project create a source of water pollution or have an impact on water quality (e.g. alters dilution)? AND
 - ii. Is the plan or project within the hydrological catchment of a habitats site which includes interest features that are sensitive to the water quality impacts from the plan or project?

Answer: NO

The proposal is for works to an existing dwelling and will not impact upon the average occupancy figures for dwellings across the catchment and will therefore not impact upon water quality in the SAC. In addition, the discharge for WwTW is downstream of the SAC.

Conclusion: It is not necessary to carry out an assessment under the Habitats regs

Equalities and diversity issues

35. There are no equality or diversity issues.

Local finance considerations

36. Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are defined as a government grant or the Community Infrastructure Levy. Whether or not a local finance consideration is material to a particular decision will depend on whether it could help to make the development acceptable in planning terms. It would not be appropriate to make a decision on the potential for the development to raise money for a local authority.

37. In this case local finance considerations are/are not considered to be material to the case.

Human Rights Act 1998

38. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to approve this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

39. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to grant planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

40. The development is in accordance with the requirements of the National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

Recommendation

41. To approve Application no 23/01620/F, 25 Hill House Road, Norwich and grant planning permission subject to the following conditions:

1. Standard time limit;
2. In accordance with plans;
3. Obscure glazed windows.

Contact officer: Planner

Name: Matthew Hickie

Telephone number: +44 1603 989640

Email address: matthewhickie@norwich.gov.uk



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Existing site plan
1:200



Location plan
1:1250

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Key:



Single storey extension approved on application 23/00416/F. (Under construction)

Retrospect Planning application for the Loft conversion

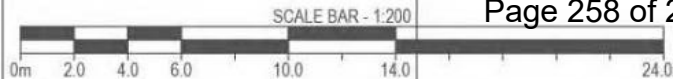


Proposed site plan
1:200

Rev A - Loft conversion (Retrospective) - 21/12/2023

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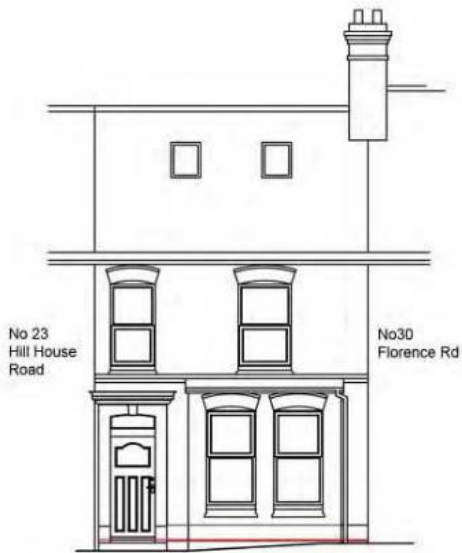


Address: 25 Hill House Road
NR1 4BE

A3

Page 258 of 262

Client: Mr L Murphy			
Project: Retrospective alterations to an Loft Conversion			
Title: Location plan, Existing site plan & Proposed site plan			
Job No:	246	Drg No:	
SCALE	1:1250 / 1:200		001
DATE	March 2023		A



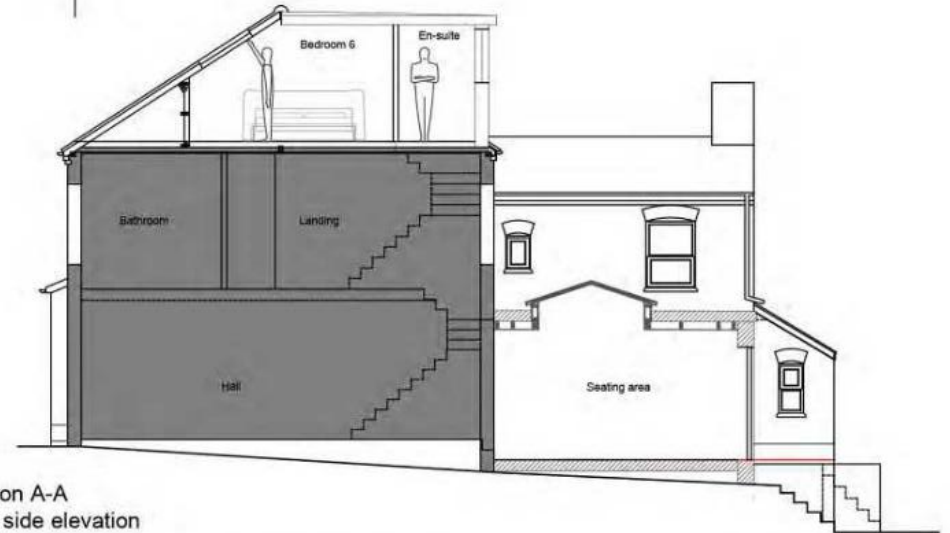
Front Elevation
1:100



Rear Elevation
1:100



Side Elevation
1:100



Section A-A
Rear side elevation
1:100

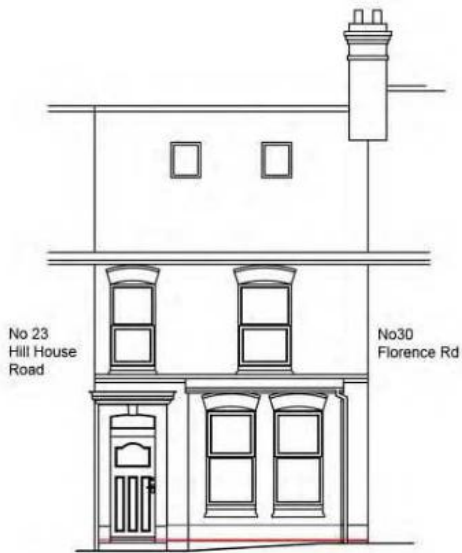
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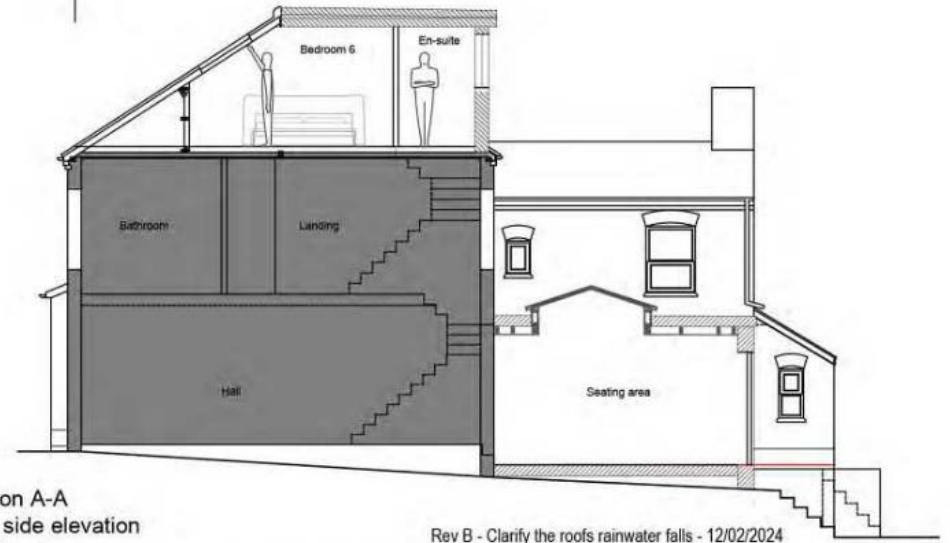
Front Elevation
1:100



Rear Elevation
1:100



Side Elevation
1:100



Section A-A
Rear side elevation
1:100

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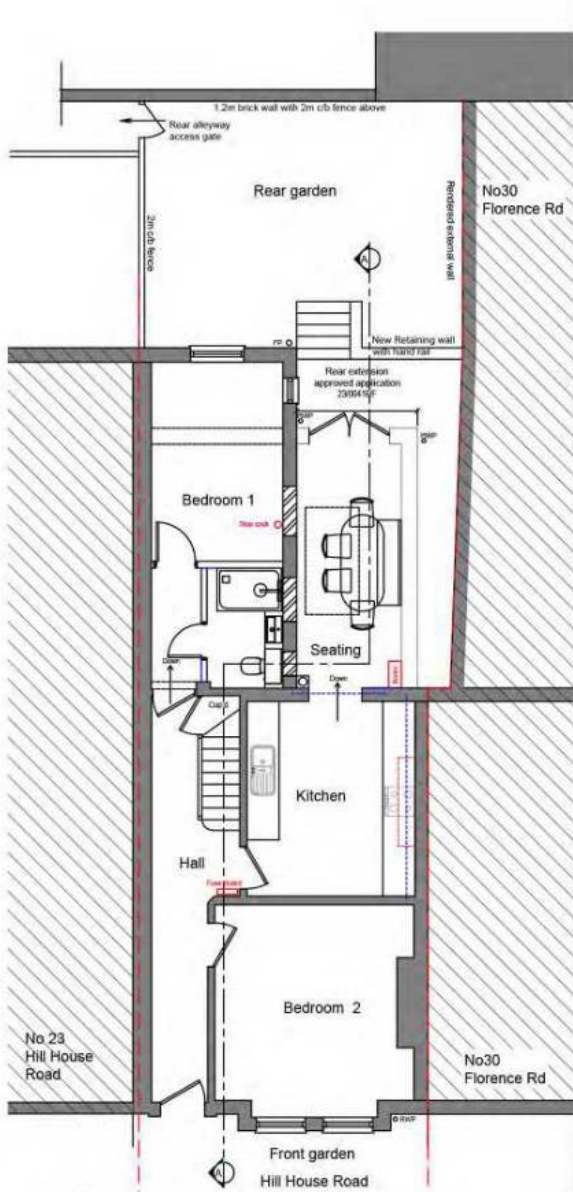
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Rev B - Clarify the roofs rainwater falls - 12/02/2024
Rev A - Loft conversion (Retrospective) - 21/12/2023



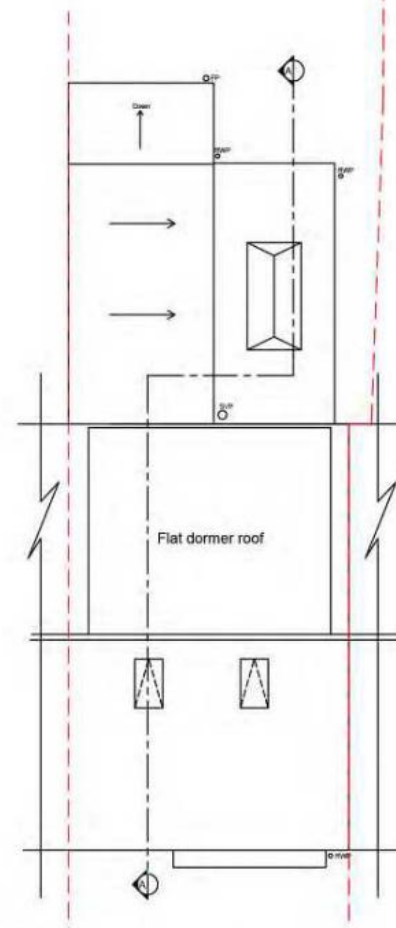
Ground floor
1:100



First floor
1:100



2nd floor plan
1:100



Roof plan
1:100

Rev A - Loft conversion (Retrospective) - 21/12/2023

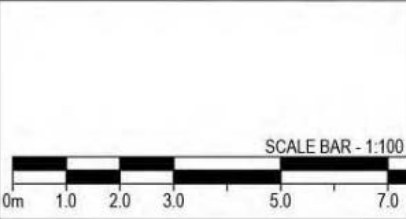
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Address: 25 Hill House Road
NR1 4BE

Client: Mr L Murphy			
Project: Retrospective alterations to an Loft Conversion			
Title: Proposed floor plans & Roof plan			
Job No:	246	Dwg No:	Rev:
SCALE	1:100		003
DATE	March 2023		A

