

Planning Applications Committee

19 June 2008

Section B

Agenda Number:	B3
Section/Area: I	INNER
Ward:	THORPE
Officer:	Anne Napier
Valid Date:	21st February 2008
Application Number:	08/00034/O
Site Address :	Gothic Works Hardy Road Norwich NR1 1JD
Proposal:	Demolition and clearance of existing factory (with retention of one building) and redevelopment of site to provide mixed use development, including offices, residential, special needs housing, shops, student flats, public park, car and cycle parking and community facilities.
Applicant:	FKI PLC / FKI Trustees Limited
Agent:	Cator And Co.

THE SITE

The application site is some 4ha in size and is situated to the east of the city centre, between land approved for redevelopment adjacent to the football club to

the west and the main Norwich to London/Cambridge railway line and rail depot to the east. To the north and west of the site is an area of traditional terraced housing, known as the Harbour Triangle, with a range of Listed one and a half storey cottages (Railway Cottages) immediately adjoining the site to the north. To the south of the application site is a strip of land bordering the River Wensum (part of the Broads) with the 'Colmans' (Britvic Soft Drinks and Unilever UK Limited) site on the opposite bank of the river. In planning terms, the Broads has the same protection status as a National Park and is designated as an area of protected status for its special qualities including, amongst other things, its landscape quality. Adjacent to the south-east of the site, Hardy Road passes under the mainline Trowse Swing Bridge and provides (restricted height) vehicular and pedestrian access to the rail depot and Utilities site beyond. The site currently houses ATB Laurence Scott, a specialised engineering firm, and is allocated under saved policy EMP15 of the City of Norwich Replacement Local Plan 2004, for redevelopment primarily for employment uses.

RELEVANT PLANNING HISTORY

There have been a number of relatively small scale applications related to the use of the site by ATB Laurence Scott, the last of which was approved in 1999. There have been no previous applications on the site directly relevant to the current proposal.

THE PROPOSAL

It is proposed to largely demolish and clear the existing factory, but retain one building which currently has the LSE War Memorial clock attached to it, and redevelop the site with a mixed use development, including offices, residential (family housing, retirement apartments, live/work units and residential apartments), special needs housing, shops, student accommodation, public park, car and cycle parking, a green travel centre and car pool, a biomass central heat and power facility and community facilities.

The developers' have accepted that this would not be in accordance with policy EMP15 and the application has been advertised as a departure from the Development Plan.

The application is in outline form, with only siting (layout) and means of access included as part of the application. However, the Design and Access Statement (DAS) submitted to support the application provides information concerning the proposed gross external floor areas of the various uses, and this is reproduced below, together with the developers' assessment of the number of units for each use and the number of full time equivalent jobs that might be created:

Office	1,810sq.m.	150 office workers
Live/Work	2,750sq.m. 15 units,	15 jobs

Family Houses	5,817sq.m.	47 houses	
Apartments	20,395sq.m.	202 units,	2 jobs (conciierge)
Retirement apartments	5,380sq.m.	71 units,	5 jobs
Student accommodation	9,736sq.m.	403 students,	5 jobs
Special needs housing	2,030sq.m.	24 residents,	25 jobs
Community	585sq.m.		1 job
Retail	1,375sq.m.	3 units,	12 jobs
Cycle parking	740 sq.m.		1 job
Undercroft car park	2,390 sq.m.		
Public Park	6,650 sq.m.		1 job
Car pool			1 job
Offsite (cleaners, fast-food, delivery etc)			5 jobs
Total	59,658 sq.m.		222 jobs

The redevelopment of a site of this size and location would result in a number of environmental impacts. In view of the size of the proposal and its sensitive location, adjacent to the Broads, the developers submitted an Environmental Statement (ES) as part of the application. Consequently the application has been advertised and considered under the Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 1999.

The ES non-technical summary states that the developer arrived at the following objectives which then formed the detail of the proposals:

- Introduction of a range of uses to provide a mixed and vibrant new community;
- To provide a residential element to address housing need in the Norwich area;
- To provide a variety of residential uses with a view to reducing peak time travel and car usage;
- Replacing the existing jobs if at all possible, with opportunities for local employment, (e.g. office, local retail, care home, live/work units);
- Recognising the location as a 'Gateway Site' relating to the river, railway bridge and the scale of adjacent development proposals;
- The potential to create a positively new type of inner city low carbon development;
- The incorporation of positive public realm with substantial open space of an urban character

Paragraph 4.1 of the DAS outlines the concept for the development of the site: 'The concept and vision for the site is to create a new 'destination' within Norwich, and a development that provides an inspiring gateway to the city on arrival by rail and water.

The departure of industrial activity and its associated "big box" buildings from the site provides an access to the opportunity to create in their place a new mixed use residential quarter with a substantial public open space attractive to residents, local employees and passers by. The existing cul-de-sac development

will become a people focused destination with increased permeability, riverside walk and strong sense of new 'place' added to the fabric of Norwich.

The massing and layout of the scheme also responds directly to the varying context along its parameters, site constraints and environmental issues.'

There is a variety of building heights, scales and types around the application site and the DAS outlines in some detail the proposal and its relationship to the surrounding development, both existing and proposed. Reference is made to the master plan prepared for the development of the adjacent Norwich City Football Club land, in terms of the uses proposed on the application site, the urban grain of the development and its linkages to the adjoining site, landscape and scale. Reference is also made to the scale and appearance of the development in relation to the existing townscape and layout around the site. Massing views have been prepared and incorporated into the DAS to illustrate the form and scale of the development proposed and its likely impact on and relationship with the surrounding development.

These show a development which graduates in height from 2 stories on the northern boundary of the site (adjacent to the Listed Railway Cottages) to some 14/16 stories on the southern boundary adjacent to the riverside land. Broadly, the development is proposed in a linear arrangement running north-south within the site. Residential development would be located towards the north and west of the site, with offices and apartments above to the south, retail to the west and student accommodation to the east adjacent to the railway line. The central part of the site would form an urban park with a children's play area located in close proximity to the family housing to the north. Within this a Sustainable Urban Drainage System (SUDS) is proposed, currently shown as a linear north-south water channel, although other options could be considered. Reference is made to the importance of creating a positive sense of place, which becomes a destination in its own right, with increased permeability. It is suggested that the layout, aspect and scale of the development would 'provide a natural opportunity to create a 'recreation-oriented' public realm, of the sort achieved in an increasing number of mainland European cities.'

The DAS explains that the variety of residential uses proposed has been selected for a number of reasons:

- Family houses, with a mixture of open market and 'affordable' houses, providing an opportunity for those who wish to stay in the locality, but who have outgrown their flat or smaller house, to do so;
- Live / work units providing daytime activity and employment on the site, without generating traffic during peak hours;
- Special needs housing, for example for the severely disabled, would provide not only a relatively central site for such accommodation, but also opportunities for employment for local people who do not drive to work. Very little traffic would be generated;
- The provision of retirement apartments offer number of benefits in addition to

providing homes for the elderly: i) Elderly people vacating larger homes increase the number of family homes available on the market; ii) A number of jobs would be created; iii) There would be very limited car parking provision and the minor traffic creation would tend to be outside peak hours;

- The provision of student flats would have similar consequences. It would also potentially free up houses rented to students on the open market for family use and would provide more student residences. Again student housing would provide jobs and create very little traffic, especially at peak times; and
- A mixture of 1, 2 and 3 bedroom open market and 'affordable' apartments are proposed to cater for residents in a variety of circumstances.

The development is seen as an opportunity to incorporate the use of climate change prevention and adaptation measures including the use of SUDS, increased biodiversity within the site including through the urban park and green roofs, decentralized power generation, the possible use of ground source heat pumps/ boreholes, surplus heat-transfer, homes designed to an eco-homes 'excellent' standard, incorporating the use of solar panels. Other renewable and low-carbon energy measures could also be considered, e.g. the use of PV or roof-mounted wind turbines.

The layout and orientation of the buildings have been designed in order to maximise the amount of sun penetration within the site, minimise over-shadowing and create an effective acoustic barrier to the adjoining railway line. A sunpath analysis indicates the likely impact of a development of the type proposed on the amount of shadow created at the spring and autumn equinox and in mid-summer.

The site is considered to be in a very sustainable location, close to local amenities and good public transport links. The over-riding design philosophy seeks to reduce reliance on the private car through: improved accessibility to pedestrian, cycling and public transport facilities; active promotion of walking, cycling and use bus; measures to facilitate access for mobility impaired persons; incentives to encourage the use of sustainable modes of travel, i.e. bus and cycling; organisation of cycle training and access to favourable purchase and maintenance rates; provision of on-site cycle parking, shower and locker facilities; membership to a car club; and the organisation and promotion of a car-share scheme(s). The Transport Assessment submitted in support of the application includes an outline Travel Plan which details the measures proposed to be pursued. It also includes details of the effect of the scheme on the local highway network. This has been assessed by the developers and their analysis indicates that the traffic to be generated can be satisfactorily accommodated with no noticeable effect over and above the network usage levels recently approved for the NCFC development. The development seeks to enhance links with the adjoining development, provide shared surface 'home-zone' routes within the site and enable bus service provision to be accommodated within the site. Furthermore the use of the private car will be discouraged through the use of

time limited on street spaces and a restricted number of spaces. It is proposed that only one car parking space is provided for the family homes and that no space be provided for 30% of the apartments.

A Flood Risk Assessment also supports the application. This identifies that the site lies outside of the functional flood plain and straddles Flood Zones 2 (Medium Probability) and 3a (High Probability). In terms of the proposed uses on the site, the commercial uses are classified as 'Less Vulnerable' under PPS25 and the residential uses as 'More Vulnerable'. A site based sequential approach to the development of the site was taken by the developer, so that the least vulnerable land use (commercial and parking) is situated in the area of the site with the highest probability of flooding. Additionally, flood protection measures are proposed such as the specification of finished floor levels, the level of access routes around the site, the preparation of an emergency evacuation procedure, the incorporation of a raised embankment along the southern site boundary and the provision of surface water storage and swales within the linear park if high river levels prevent immediate discharge to the river.

The ES accompanying the application seeks to predict the likely environmental impacts of the proposals, the significance of those impacts and identify any mitigation required. A non-technical summary forms part of the ES, together with a description of the proposals and specific chapters on the following matters: ground condition survey; noise and vibration; transport; flood risk; archaeology; ecology; and socio-economic issues

CONSULTATIONS

Advertised in the press, on site and neighbours notified:

Individual letters of representation were received from 9 local residents and neighbouring land users.

The following were **consulted** on the application:

Anglian Water Services Ltd; Norfolk Landscape Archaeology; Network Rail (Southern); Norfolk Wildlife Trust; Norfolk County Council (Strategic Planning; Planning Obligations Coordinator; Strategic Highway Authority); Natural England; Broads Authority; Norfolk Police (Architectural Liaison); Sport England; East of England Regional Assembly, East of England Development Agency, and the Environment Agency. The proposals have also been considered by the Norwich Society and the Quality Panel.

In order to facilitate the analysis of the responses received, rather than summarize the comments by respondent, the comments received from both consultees and interested parties have been summarized and grouped under headings related to each issue. These are contained in a table as Appendix A.

PLANNING CONSIDERATIONS

Relevant Central Government Guidance includes:

PPS1: Delivering Sustainable Development
PPS: Planning and Climate Change – Supplement to PPS1
PPS3: Housing
PPG4: Industrial, Commercial Development and Small Firms
PPS6: Planning for Town Centres
PPS9: Biodiversity and Geological Conservation
PPS10: Planning for Sustainable Waste Management
PPG13: Transport
PPS15: Planning and the Historic Environment
PPG16: Archaeology and Planning
PPG17: Planning for Open Space, Sport and Recreation
PPS22: Renewable Energy
PPS23: Planning and Pollution Control
PPG24: Planning and Noise
PPS25: Development and Flood Risk
The Planning System: General Principles

Relevant East of England Plan policies include:

T14: Parking
ENG1: Carbon Dioxide Emissions and Energy Performance
WM6: Waste Management in Development

Relevant Saved Norfolk Structure Plan policies include:

T.2: Transport – New Development

Relevant Saved City of Norwich Replacement Local Plan policies include:

NE8: Protection and enhancement of biodiversity in development proposals
NE9: Landscaping schemes associated with development
HBE4: Other areas of archaeological interest
HBE7: Conservation of standing archaeology
HBE9: Listed buildings
HBE12: Urban design strategy
HBE13: Height of buildings and corridors of vision
HBE14: Gateways to the city
HBE19: Site design for safety and security
EP1: Contamination
EP5: Air pollution and development
EP10: Noise between residential and adjacent uses
EP12: Development in areas at risk of flooding
EP16: Water resource conservation
EP17: Water quality re treatment of run-off from car parks
EP18: Energy efficiency in development
EP19: Renewable energy development

EP20: Use of materials
EP21: Recycling facilities
EP22: Protection of residential amenity
EMP15: Allocation policy for Laurence and Scott site
EMP16: Provision for office development
TVA3: River related tourism and moorings
SHO3: Criteria for the assessment of retail proposals
SHO22: Food and drink uses in centres
HOU1: Housing development targets
HOU4: Affordable housing requirement in housing development
HOU5: Accessible Housing
HOU6: Development requirements for housing proposals
HOU7: Phasing of housing development and identification of strategic sites
HOU13: Criteria for other housing site proposals
AEC2: Proposals for local community facilities
SR1: Open space standards
SR2: Detailed standards for types of open space provision
SR4: Requirement for open space in new housing development
SR6: Dual use of open space provision
SR7: Provision for equipped children's play
SR11: Riverside walks provided through development
SR12: Green links
SR14: Design and Amenity criteria for sport and recreational development
TRA3: Modal shift from car to other modes
TRA5: Sustainable design to reduce car use to minimum
TRA6: Parking standards
TRA7: Cycle parking provision
TRA8: Provision in development for servicing
TRA9: Car free housing and car clubs
TRA10: Design and transport requirements for access to local transport networks
TRA11: Developer contributions to wider traffic impact mitigation
TRA12: Travel Plans related to development proposals
TRA14: Design of pedestrian routes and areas
TRA15: Design of cycling routes and network
TRA16: Bus priority measures and development

Relevant Supplementary Planning Documents include:

Open space and play provision
Green links and riverside walks
Heritage interpretation
Flood risk and development
Transport contributions
Accessible and special needs housing
Energy efficiency and renewable energy
Norfolk Biodiversity SPG

The application has been submitted in outline, effectively asking for the principle of the development to be considered. Should the application be approved, the details of the proposal would be submitted as reserved matters subsequently. However, the submission of an Environmental Statement and the consideration of the application under the appropriate Environmental Impact Assessment (EIA) Regulations has a bearing on this. These regulations are designed to ensure that the environmental impacts likely to arise from a proposed development have been identified, assessed and appropriate mitigation measures put forward, prior to a decision being made in principle on the development proposal. This information should be fully detailed as part of the ES accompanying the application and should not be conditioned to be assessed at a later date. If this information has not been provided, it is open to the local planning authority to request such additional supporting details as required in order to be able to assess the environmental impacts of the proposal, or to refuse the application.

In this instance, the applicants have been advised of the considered omissions and inaccuracies of the ES but have not been asked to provide this information as part of the current application submission. Partly, this reflects the amount of additional information necessary and the length of time likely to be required to undertake baseline studies, to identify and predict the likely impacts and their significance, and to identify appropriate mitigation measures. However, it also reflects the situation concerning the issues of principle that have arisen in respect of the development proposed and the reluctance to ask the developer to undertake a significant amount of additional work in respect of the ES if the application is unlikely to be considered acceptable in principle.

The redevelopment of this site with a mixed-use scheme as proposed raises significant issues in terms of both the principle of the proposed development and also matters of detail as pertaining to the particular scheme put forward for consideration. Given the large number of detailed matters, it is not proposed to analyse each of these in depth but to concentrate on the main issues associated with the development in assessing the merits of the proposal at this outline stage.

The **main issues of principle** in relation to the development proposed are considered to be:

- the loss of employment land
- prematurity
- transportation/ movement implications

Other issues are considered to be:

- ecological impact
- landscape impact
- archaeological impact
- sustainability/ renewable energy
- flood risk
- contamination

- air quality
- socio-economic impact
- design/ layout
- housing
- health and safety
- noise & vibration
- provision of community facilities/ public spaces
- lighting
- plant and machinery/ ventilation systems

In addition to the above issues, there are also some **procedural matters** of relevance. The application was submitted with an ownership certificate stating that the applicants own the entire site. However, part of the application site currently comprises an un-used office building on Hardy Road that adjoins and is attached to the another building, recently converted to residential use and known as The Factory, on Kerrison Road. It is understood that this building is in separate ownership and as such the matter has been raised with the applicants as notice was not served on the owners of The Factory prior to the submission of the application. However, it is understood that the owners are aware of the application and have had sufficient opportunity to comment on the proposals had they wished so to do. Furthermore, the building identified as being retained and re-used as a community building, which currently has the War Memorial clock attached to it, is believed to have been incorrectly located on the site plans and is shown further north within the site than it appears to be in reality. This has implications for the proposed layout and the submitted scheme would require amendment in order to reflect this.

Loss of employment land:

The site is allocated primarily for employment redevelopment and saved policy EMP15 of the City of Norwich Replacement Local Plan makes specific reference to this site. At the time the policy was drafted, the future of the occupiers of the site appeared uncertain and wording of the policy reflects this. Policy EMP15 states:

The former Laurence Scott and Electromotors site, Kerrison Road/Hardy Road [EMP15.1, 4.21 ha] is allocated for redevelopment primarily for employment uses within Use Classes B1 and B8, in accordance with Policy EMP8 together with smaller amounts of housing development and leisure development subject to clauses a) and b) below. Proposals for development will be permitted where:

- (i) Development is undertaken on the basis of a comprehensive scheme for the whole site;*
- (ii) Provision is made for the following infrastructural works as part of any scheme:*
 - *A suitably upgraded vehicular access from the west end of the site which can be satisfactorily integrated with access and servicing arrangements to the adjoining approved development sites at*

Kerrison Road and the Football Club;

- A new pedestrian and cycle route or routes alongside the River Wensum designed to facilitate the extension of the pedestrian and cycle network along the river corridor to the east;*
- Reservation of sufficient land within the scheme to enable an all purpose vehicular access to be provided from Hardy Road across the railway line to serve the Utilities Site, Cremorne Lane (EMP14), should that option be shown to be feasible.*

Additional uses will be accepted within such a scheme:

a) Leisure uses (Use Class D2) and visitor attractions in the southern part of the site fronting and adjacent to the River Wensum, provided that the developer can demonstrate that the proposed use would have a functional relationship with the river and that the criteria of policy AEC1 are satisfied;

b) Housing (up to approximately 1.5 hectares to the northwest of the site, provided that the developer can demonstrate that there will be no adverse impact on future residential occupiers by reason of noise nuisance from adjoining uses.

In relation to this policy, it should be noted that Use Class B1 refers to office, light industrial and research and development uses and Use Class B8 refers to warehouse and distribution uses. Furthermore, the policy allocation extends beyond the current application site and includes part of The Factory building which has previously been converted to residential use. Therefore, this needs to be taken into account in respect of the amount of potential housing development referred to within the policy.

The developers have accepted that the current proposal does not accord with policy EMP15 and, as such, the approval of the scheme would represent a departure from the Development Plan. PPS1 indicates that the plan-led system is central to planning and plays a key role in integrating sustainable development objectives (paragraph 8). It goes on to state, paragraph 28, that planning decisions should be taken in accordance with the development plan unless other material considerations indicate otherwise.

The developers have put forward a number of justifications for the scheme submitted, including the benefits that the scheme would bring to the area as a whole and the local economy, the creation of a vibrant new 'destination' in this part of the city, the provision of a wide variety of housing on site to meet the various needs of the local community, providing an opportunity to minimise private car usage and create a low-carbon type of development, incorporating a large amount of 'urban' open space within the public realm and the creation of some 220 jobs as a result of the proposals. They have also indicated that they consider the proposals to meet the East of England Plan's proposals for the Norwich Urban Area as a focus for growth, with a strong emphasis on urban regeneration tackling dereliction and deprivation. A key element of the development strategy is the redevelopment of vacant and underused land within the built-up area.

This is also reflected within PPG 4, which states: *'Many urban areas contain large amounts of land, once used for industrial purposes but now under-used or vacant. Getting this land back into beneficial use is important to the regeneration of towns and cities. Optimum use should be made of potential sites and existing premises in inner cities and other urban areas, taking into account such factors as accessibility by public transport, particularly in the case of labour-intensive uses'*.

However, whilst recognising that the re-use of under-used or vacant land is important and that this can greatly assist the regeneration of areas, it is not considered that this is an acceptable justification for the current proposal. The application site is currently occupied by a firm with a B2 (general industrial) use, that develops and manufactures top of the range high voltage electric motors, principally for the oil and gas industry. It is understood that it is a world leader in its niche markets and that it is highly profitable. It currently employs some 150-200 people in high quality skilled jobs.

Whilst it is acknowledged that the current occupiers of the site may not make full use of all the buildings on the site, it is also recognised that part of their operation relies on the 'test bed' building to the west of the application site and on land now owned by NCFC. This building has already received planning permission for residential conversion and the possible relocation of the test bed facility within the application site is understood to be under consideration. Therefore, this industrial site is not considered to be either vacant or under-used, and as such a move away from an employment use of the site towards a predominantly residential led mixed-use redevelopment is not considered to have been justified on this basis.

Furthermore, the East of England Plan recognises the potential for not only residential growth but also employment growth in the Greater Norwich Area. This is also reflected in the studies undertaken to support the emerging LDF. This suggests that the demand for employment within the area is likely to grow significantly, particularly for office employment. Consequently the studies point towards a policy of protecting existing employment sites unless there are very good reasons not to do so. Although there is a need to make adequate provision for housing development within the Greater Norwich Area, there is also a need to ensure that sufficient employment land is available. The site is in an accessible and sustainable location for employment development and although certain constraints do exist in terms of transportation, the redevelopment of the site for housing rather than employment use is not considered to necessarily address these constraints or justify a move away from employment use on this basis.

Although the current submissions suggest the development will lead to the creation of some 220 jobs, some 150 of which are proposed to be office jobs (B1), it is not considered that this would compensate for or be comparable with

the existing high quality employment provided on the site. Furthermore, even if the site should become vacant in the future, for the reasons outlined above it is not concluded that other material considerations have justified a departure from policy in this instance, and it is considered that the redevelopment of the site should be in accordance with the development plan and be predominantly employment led redevelopment, which could potentially achieve a much more significant level of new employment space than currently proposed.

Prematurity:

The application site is situated immediately adjacent to the main London/Cambridge railway line. Beyond this exists the rail depot and then the Utilities site, allocated for redevelopment under policy EMP14. Access into the rail depot and the Utilities site is currently achieved adjacent to the south east corner of the application site, with Hardy Road passing under the rail swing bridge. This affords an access of restricted width and height and it is not suitable for larger or emergency vehicles. Policy EMP15 requires, under criterion ii), the reservation of sufficient land within a redevelopment scheme for the application site for provision of an all purpose vehicle access to be made from Hardy Road, across the railway line and into the Utilities site, should the redevelopment of that site be shown to be feasible.

The current application proposals suggest, within the layout, that some provision could be made for access as required, as the layout shows an extension to Kerrison Road running west-east through the site and potentially abutting the eastern site boundary. However, this has not been detailed or assessed within the submissions. Rather, both the Transport Assessment and the Transport chapter of the ES refer to the existing access under the swing bridge as continuing to provide an access into the adjoining land, via a new road linking into the south-west part of Hardy Road from the NCFC redevelopment site. This would not enable the provision of an all purpose vehicular access into the Utilities site as required under policy EMP15.

The feasibility of developing the Deal Ground and Utilities sites is still being investigated. These sites have significant constraints to their redevelopment, of which access is one. As part of the LDF process, the development of a viable, sustainable, mixed-use development in this part of the city is being assessed and proposals for these sites are likely to be promoted through the LDF process or as a SPD. It is considered that progressing a major redevelopment on the current application site independently of the LDF process could prejudice the future development options for these sites which are considered key to the future regeneration of this part of the city. It is considered that proper consideration should be given to the impact of a mixed-use development of the application site on adjoining sites such as the Deal Ground and Utilities sites and that the most appropriate mechanism for considering alternative development options in this area is the LDF process. Through this process a strategic review of the development options can be undertaken to ensure the delivery of a sustainable

development scheme for the entire area.

The 'Planning System: General Principles' note produced by central government advises that: 'In some circumstances, it may be justifiable to refuse planning permission on grounds of prematurity where a DPD is being prepared or is under review, but it has not yet been adopted. This may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD.'

It is considered that the current application is premature, as it proposes a form of mixed-use development, not in accordance with the development plan and which doesn't detail or assess the ability to provide an access into the adjoining land as part of the development proposals. Therefore, it is concluded that the proposed development of the application site as proposed could prejudice the development of the adjoining sites and that this should be fully assessed through the LDF process rather than determined independently.

Transportation/ movement implications:

As detailed under the paragraphs relating to the 'The Proposal' above, the mix of development proposed, the principle of a permeable layout linking to both the Harbour Triangle and the NCFC development, and the measures outlined within the submissions seek to reflect central, regional and local policies to reduce reliance on private car usage and promote alternative modes of travel. This is considered to be consistent with the aims of these policies and the approach to achieving these aims is welcomed, including, amongst other things, the proposal to employ a Travel Coordinator and the promotion of the use of the riverside walk/ cycle path.

However, the details proposed within the application fail to address several issues and the conclusions reached on some aspects are not accepted. In particular, the findings of the Transport Assessment are not accepted, as there are doubts that the traffic generation associated with the development would keep below the levels allowed for in the modelling work done for the NCFC redevelopment. It has been agreed with the developer that more work needs to be done on the modelling undertaken to support the application, particularly the Carrow Way/ Kerrison Road junction, to establish the appropriate scale of development from a traffic generation point of view.

In addition to this, there are also no agreed mitigating transport measures proposed as part of the application submissions. There is a significant issue with the phasing of the NCFC development, as much of the current application proposal appears to rely on infrastructure and services that would be provided through the NCFC development. For instance, one of the proposed access points to the site is from the NCFC development, as is the proposed bus route. The red

line denoting the application site does not reflect this.

The application fails to adequately address the interaction of the application site with the adjoining strip of land immediately to the south and the provision of the riverside path. The termination of the north-south route through the site with a flight of steps down to the river would be an obstruction or hazard to cyclists and people with impaired mobility. The proposed bunding in this area would create a constraint which, when combined with other constraints (the existence of the railway line, the level of the carriageway in Hardy Road, land ownership and service infrastructure) is considered likely to create a situation where proposals for a riverside path would be, at best, inadequate or, at worst, unfeasible. It is considered that this aspect should be resolved as part of any redevelopment proposal for the application site.

The scheme provides only a limited indication of the level of car parking proposed. This is considered to be critical information that is required in order to assess the likely traffic generation from the site. The proposals indicate that parking would be restricted but it is considered that a schedule of proposed parking provision (both on- and off-street) is required together with a management plan as to how it would operate to enable the impacts arising from the development to be fully assessed.

In terms of public transport usage, there is no reference within the application to an agreement with a bus operator to enable a bus service to be extended into the site, nor any reference as to the ability to provide a public transport route through this site into the Utilities site beyond. Furthermore, it has not been demonstrated that the scheme is accessible to service vehicles and this aspect could have significant implications for the layout proposed and thus requires resolution at this stage.

The Travel Plan is considered to provide insufficient detail to demonstrate that successful integration with the NCFC development would be possible and the plans do not provide clarity as to the integration of the car club within the scheme. The location of the 'green travel centre' is not considered acceptable and it is suggested that a preferable location for this facility would be within the retail centre.

It is considered that cycle parking and refuse storage areas should be integrated into the development. The scale of the development is such that these areas will be significant and so, again, this aspect could have significant implications for the layout of the development and should be addressed at this stage.

There is little evidence put forward to justify some assumptions made, for example, that the live/ work units would have a lower traffic generation than 'normal' residential dwellings and that the retail development of some 1270 sq.m. would generate no vehicular traffic.

Consequently, whilst the approach taken to reduce private car use and to limit traffic generation is acknowledged, it is considered that the scheme as submitted has failed to adequately demonstrate: that the proposal would not have an adverse impact on the local highway network or the amenity of local residents; that the development would provide proper permeability with and pedestrian connection to the development to the west of the site; that sufficient regard has been had to the facilitation of the provision of a riverside path; and that adequate provision has been made for pedestrians, cyclists and waste management within the scheme. It is therefore concluded that the current proposal is contrary to policy and unacceptable in respect of this main issue.

Other issues:

In respect of the ecological impact, landscape impact, archaeological impact, sustainability, renewable energy, flood risk, contamination, air quality, design/ layout, housing, health and safety, provision of community facilities/ public spaces, lighting, and plant and machinery/ ventilation systems, the comments made by consultees and included within Appendix A are largely supported. In brief, these aspects, together with the assessment of the socio-economic impact of the proposals, are considered either to have been inadequately addressed as part of the application submissions or to have failed to have been addressed at all. Whilst there are some reservations about the baseline studies undertaken in respect of noise impact, the assessment of those impacts and the mitigation measures proposed in respect of noise and vibration are considered acceptable.

Conclusion:

Although there are certain aspects of the scheme that would result in a positive impact, for example, the inclusion of a sustainable urban drainage system, the incorporation of renewable and low-carbon energy provision and the creation of an urban park, these matters are not sufficient to outweigh the concerns in respect of other aspects of the proposals, in particular the loss of employment land, the prematurity of the scheme, the likely transport and movement impacts of the development and the other potential environmental and other impacts of the proposals. It is therefore concluded that the current application is unacceptable and should be refused.

RECOMMENDATIONS

REFUSE PLANNING PERMISSION on the following grounds, with full reasons for refusal to be circulated at the Committee meeting:

1. Loss of employment land
2. Prematurity
3. Unacceptable impact on highway network

4. Unacceptable impact on amenity of existing local residents in relation to parking and access routes
5. Unacceptable permeability with and connection to adjoining developments
6. Inadequate consideration of provision of riverside path
7. Inadequate provision for pedestrians, cyclists and waste management
8. Insufficient information provided to demonstrate that the proposals would not have an adverse impact on protected species, landscape, archaeology, flood risk, water efficiency, air quality, and socio-economic character of the area.
9. Insufficient information provided to demonstrate that the proposals would adequately address sustainability and renewable energy, the provision of community facilities and open space, contamination, health and safety, lighting, the living conditions of future residents, provision of plant and machinery and ventilation systems.
10. Inadequate provision for affordable housing
11. Lack of needs analysis for student accommodation and special needs accommodation
12. Inappropriate layout and design in relation to adjoining development, proposed public spaces, the land to the east of the site and the river

APPENDIX A:

Summary of consultation responses and representations received

Issue	Consultee	Comments
Loss of employment land	East of England Development Agency (EEDA)	Concerned at potential loss of employment land Contrary to EMP 15 as development as proposed would not achieve a significant level of new employment space
	East of England Regional Assembly (EERA)	Not consistent with the protection of employment land (RSS policy E2-E4)
	Letter of representation	Application contrary to adopted saved policy EMP15. Reference made to Planning Policy Statement 1 'Delivering Sustainable Development' and the emphasis given in the document to the importance of a plan-led system in achieving sustainable development and need for planning decisions to be taken in accordance with the development plan unless other material considerations indicate otherwise. Current proposal not in accordance with EMP15 as this precludes the amount of non-employment development proposed. Considers there to be a presumption against the current proposal in development plan terms.
Prematurity	Letter of representation	Development options are still under consideration for the Deal Ground and Utilities sites, adjacent to the application site to the east. These sites have access and other feasibility constraints which have prevented their redevelopment in the past. A new and robust policy framework is therefore

		<p>needed to deliver regeneration. Possible development opportunities for the delivery of a viable, sustainable mixed-use development are currently being assessed and will be promoted through the emerging LDF process or as a Supplementary Planning Document (SPD).</p> <p>Although mixed-use development may be appropriate on the application site, proper consideration needs to be given to the impact that such a development will have on adjoining sites such as the Deal Ground and Utilities sites. Most appropriate mechanism for considering alternative development options in this area is the LDF or a SPD. Through this process a strategic review of development options can be undertaken to ensure the delivery of a sustainable development scheme for the entire area.</p> <p>To determine the current application in isolation could prejudice the delivery of a SPD or emerging policies in the LDF. Consequently current application is considered premature. Reference made to 'General Principles' note produced by central government on this issue, indicating that in some cases a refusal on grounds of prematurity may be appropriate</p>
Transportation/ movement implications	Norfolk County Council Highways (Strategic)	<p>Holding objection: do not agree with the findings of the Transport Assessment as there are doubts that the development would keep below the levels allowed for in the modelling work done for the NCFC redevelopment. Have agreed with the developer that more work needs to be done on the modelling, particularly the Carrow Way/ Kerrison Road junction to establish the appropriate scale of development from a traffic generation point of view. There are also no agreed mitigating transport measures. Significant issue with the phasing of the NCFC development, as much of the current application proposal appears to rely on infrastructure and services that would be provided through the NCFC development. For instance, one of the proposed access points to the site is from the NCFC development, as is the proposed bus route.</p> <p>Also concern expressed at the request for a 5 year outline permission.</p>

		<p>Consider this not to have been justified in planning terms but seems to be an intention of the developer to 'bank' a permission.</p>
	EERA	<p>Consistent with policies T2 & T9 of RSS by encouraging sustainable methods of transport, promoting low car usage, promoting new bus route and bus stops on site, proposing safe pedestrian access routes to link with adjacent areas of housing and city centre and riverside cycle route</p>
	Norwich Rivers Heritage Group	<p>Old people and students both have cars. To avoid overloading the transport system reduce the scale and density of the development.</p>
	Network Rail	<p>Demolition of buildings must be carried out in accordance with an agreed method statement</p> <p>Positioning of plant, scaffolding and cranes to be detailed</p> <p>Land has a history of instability and any alterations to ground levels within 10m of boundary would need to ensure that they will not impact on the stability of the railway.</p>
	Green Spaces, Norwich City Council	<p>Issues relating to flood defences and possible conflict with riverside walk. Site has also been identified as a possible location for a slipway for canoes – parking provision would be required if this option were to be pursued</p>
	Letter of representation	<p>Strong concerns about traffic and parking. Currently parking is difficult in the evening. Traffic in and out of the Harbour Triangle is terrible at peak times and when the traffic is queued back from Bracondale.</p>
	Letter of representation	<p>Serious concerns that the access to the site is not adequate given the number of properties proposed. Current junction at Kerrison Road is to say the least poor and needs to be improved as part of this proposal.</p>

	<p>Broads Authority</p> <p>Letter of representation</p> <p>Letter of representation</p>	<p>Although proposal provides an allocation of 0.7 parking places per property in line with NCC requirements, considers that the development will attract a less diverse cross section of the population as compared to the rest of the city and would therefore expect to see an allocation of a minimum of 1 space per property with no use of on-road parking</p> <p>Pleased to see the pedestrian/ cycle access along the river frontage.</p> <p>Amount of housing proposed would lead to an extremely dense development in terms of population on this site causing traffic problems</p> <p>If the LPA considers the proposal acceptable, it is requested that a pedestrian and vehicular access route from Hardy Road to the Utilities site be safeguarded as this will assist in delivering a suitable access strategy for the Utilities site.</p>
Archaeology/ historic environment	Norfolk Landscape Archaeology	<p>ES Chapter 8 omits reference to impact of the development on factory building itself</p> <p>Building important from an industrial archaeology aspect</p> <p>ES should include: archaeological evaluation of subterranean deposits including a geophysics and borehole survey pre-determination to inform a more targeted later phase of trial trenching</p> <p>Also ES needs to include a Historic Buildings Assessment of factory building so that a informed and reasonable decision can be made pre-determination as to the merits of retaining the building</p>

	EERA	Retention of war memorial plaque and clock proposed – consistent with RSS policy ENV6
Ecological impact	<p>EERA</p> <p>Natural England</p> <p>Norfolk County Council Planning Obligations</p> <p>Norfolk Wildlife Trust</p>	<p>ES notes that proposal unlikely to have any adverse ecological impact but that further surveys planned and necessary mitigation measures would be undertaken</p> <p>Central park area adds scope for increased biodiversity</p> <p>Unlikely to have impacts on River Wensum SSSI further upstream providing contractors follow the good practice guidance set out in ES</p> <p>No objection on grounds of impacts on designated sites</p> <p>Objection re impact on protected species – insufficient survey information to demonstrate whether or not the proposal would have an adverse effect on a legally protected species – bats. Information required pre-determination (PPS9). Without information impossible to establish that the protected species or their habitats will be unaffected by the proposal. Recommend refusal.</p> <p>Encourage developer to be sympathetic to importance of riverine habitat as a wildlife corridor, connectivity important and links with green roofs and reedbed filtration system. Provision of bird boxes within scheme endorsed and concur that proposal offers opportunities for biodiversity enhancements</p> <p>May be a requirement for commuted sum payment to cover landscaping and future maintenance of planted areas on highway land.</p> <p>Potential biodiversity issues not adequately addressed in ES. Potential impact on bat species noted and proposals to ensure biodiversity enhancements. But implications of impacts on river corridor in relation to its use by bats and other</p>

	Letter of representation	<p>species not been adequately addressed especially with regard to lighting. An assessment of lighting impacts on bats and other species required within ES especially with regard to the river corridor.</p> <p>Ecological survey of the site superficial and proposed mitigation fails to address important issues.</p> <p>The impact of light trespass and glare (pollution) from the development may impact on the river as a foraging and commuting area for bats – potential for impact on Biodiversity Action Plan and European protected species.</p> <p>Proposals need to develop appropriate mitigation and screening of the site to maintain the dark conditions on the river.</p>
Landscape impact	<p>Norwich Rivers Heritage Group</p> <p>Network Rail</p> <p>Letter of representation</p>	<p>Proposed development of two tall blocks of flats on the river frontage is unacceptable: new buildings should be set back from the river, not exceed three stories in height, and reduce in height as they go out of the city to blend into the scale of development beyond Trowse swing bridge</p> <p>Details of landscaping along the railway line to be submitted to Network Rail who can provide advice on appropriate planting species as well as inappropriate planting</p> <p>Tall part of the development will be a strong visual presence on the skyline and detract from the amenity of the area. The plans do not show the development against an appropriate reference point (e.g. the football stadium). Conclude that the plans are deliberately trying to avoid demonstrating this impact.</p>

	Broads Authority	Information submitted in respect of landscape impact and assessment is inadequate and fails to adequately address the relationship between the site and the river. This is exemplified by the absence of the inclusion of any information on the important views of the site from the river or an assessment of the links between the two. Therefore formally objection to the application.
Layout	Letter of representation	<p>Pre-application meeting with residents resulted in revised layout adjacent to Railway Cottages and a revised height of the buildings fronting them. This is not reflected in the current submissions.</p> <p>Access into the site from Cozens Road should be for emergency access only by vehicles but open to pedestrians and cyclists. Currently the lode tends to be used mainly by walkers, children and train spotters and a change to the character of that lode would be detrimental to the area and to the local community.</p> <p>Elements that are favourable – open space, use of ‘shared streets’, inclusion of family property and retention of original building for public use. Also pre-application consultation with local residents and taking into account feedback and changing the plans in response – although have left people confused as to what has actually been submitted.</p>
	Letter of representation	Relocation of properties E6 and revision to parking referred to but not reflected in submitted plans.
Design	Quality Panel	<p>Positive views expressed about many aspects of scheme</p> <p>Concern re lack of dynamic route through or link to adjacent NCFC site</p> <p>Central space incorporates some good ideas (especially the SUDS scheme) but primary pedestrian routes need to be illustrated more clearly</p>

		<p>Needs continuity along river frontage as well as the riverside link</p> <p>Relationship between tall building elements of both schemes needs to be clarified</p> <p>Model would be useful</p> <p>This major outline application demands a three-dimensional model to allow proper judgment of its lay-out and of the impact of its tallest buildings on the rest of the development</p> <p>Organisation of space appears well thought out, with acoustic/ student housing wall to the railway line, provision of different types of housing and open space. Opening up to river and better access from Carrow Road also welcome.</p> <p>Tallest buildings at 15/16 storeys are in line with other developments</p>
	Norwich Society	
	EERA	<p>Consistent with RSS policy ENV6 – high standards of design proposed including opportunities for sustainable design, complementing adjoining proposals and recognising the Code for Sustainable Homes</p>
	Network Rail	<p>Given the use of the site, a 1.8m high fence should be constructed to avoid trespass and vandalism and provide acoustic insulation for the residential units</p> <p>In order to ensure that the new development can be constructed and maintained without encroachment onto the operational railway, all buildings and structures to be set back at least 2m from boundary or at least 5m for overhead power lines</p>

	Letter of representation	<p>Strong support for development proposed. Developments of this nature needed to fulfil Norwich's role as the capital of East Anglia. Impact on the skyline acceptable and will result in a skyline that incorporates both the old and the new.</p>
	Letter of representation	<p>Concerned about the height of buildings near to the river – should be of a similar height and type as neighbouring development. Proposal currently looks rather overbearing.</p>
	Letter of representation	<p>Housing proposed at E6 would lead to a loss of privacy to Railway cottages and their gardens. Proposed dwellings are for 2 storey properties. Original factory building adjacent to these cottages was single storey prior to its demolition and this and its industrial use ensured a high level of privacy for the cottages at the times of day when privacy is valued most. Properties in E6 should be no higher than existing cottages and set back from lane no closer than the existing cottages.</p> <p>Section of Cozens Road adjacent to the Listed cottages is very quiet. These cottages have no back garden and so the front garden fulfils that function. To maintain the character of the lane it is essential that this section of Cozens Road is used solely to access the existing properties and does not become a vehicular exit or entrance to the new development. Emergency service vehicle access only. This is also important in order to ensure that the lane is safe for pedestrian and cyclists accessing the riverside path via the route through the new development.</p> <p>If the lane is to be increased in width pavements and wooded verges should be provided on both sides in order to maintain the character of the listed cottages.</p>

	<p>Broads Authority</p> <p>Letter of representation</p>	<p>The scale and massing of the buildings, particularly along the river frontage, is inappropriate and excessive and would lead to an overbearing aspect from the river. Poor relationship between the blocks and the river itself which, when combined with the development opposite and to the west, would perpetuate the canyonisation of the river here and create a townscape which is inappropriate with an adverse impact on the local character.</p> <p>Objects to proposals for tower blocks – this type of development has been long discredited in terms of social cohesion and their impact on the local area is quite hideous – reference made to Normandie Tower on Rouen Road as an example and other more recent developments in the immediate vicinity. Inappropriate form of development in this location.</p>
Social Impact	Letter of representation	Unclear as to demand for student housing on this side of the city. Without a clear and binding agreement committing an appropriate institution to occupying the residences has concern over uptake of the rooms and the possibility of alternative uses for such single accommodation units being inappropriate on such a large scale.
Housing	<p>EERA</p> <p>Norwich Rivers Heritage Group</p> <p>Strategic Housing, Norwich City Council</p>	<p>Consistent with RSS policy H2 re provision of housing but inconsistent with RSS H3 re affordable housing – only 30% proposed rather than 35% required in RSS when adopted</p> <p>Old people and students are not a compatible mix</p> <p>The assessment of the level of affordable housing required needs to provide for 30% of all units on the site as affordable housing, including the student accommodation, sheltered housing and live/work units, not just the apartments and family housing.</p>

		<p>Lack of needs analysis in relation to the number of student houses required. UEA has stated it has no further plans for developing student accommodation and the need for City College, the Art College and Business School is not sufficient to warrant this number. Concern that the units would remain empty.</p> <p>Lack of needs analysis in relation to Special Needs Accommodation. No discussion with Supporting People regarding this site and only aware of the need for a 6-8 bed unit for substance misuse. Would require 100% of these units to be allocated to a RSL to manage.</p> <p>No information has been provided concerning an RSL being approached re the affordable housing</p> <p>Extent of shared facilities re student accommodation and sheltered housing needs clarification</p> <p>Concerns re the management of student accommodation in close proximity to family housing, sheltered accommodation and supported housing provision</p> <p>Concern over mix of units proposed with an over-provision of smaller flats within the city and high-rise apartments can be harder to let.</p> <p>Phasing of development – affordable housing to be available prior to completion of set proportion of open market housing</p> <p>Noted that 30% of apartments will not have parking provision – need to ensure that affordable housing gets equal share of parking.</p>
Provision of community facilities/	EERA	Developer should consider the provision of a central social facility (RSS policy C1 & C2)

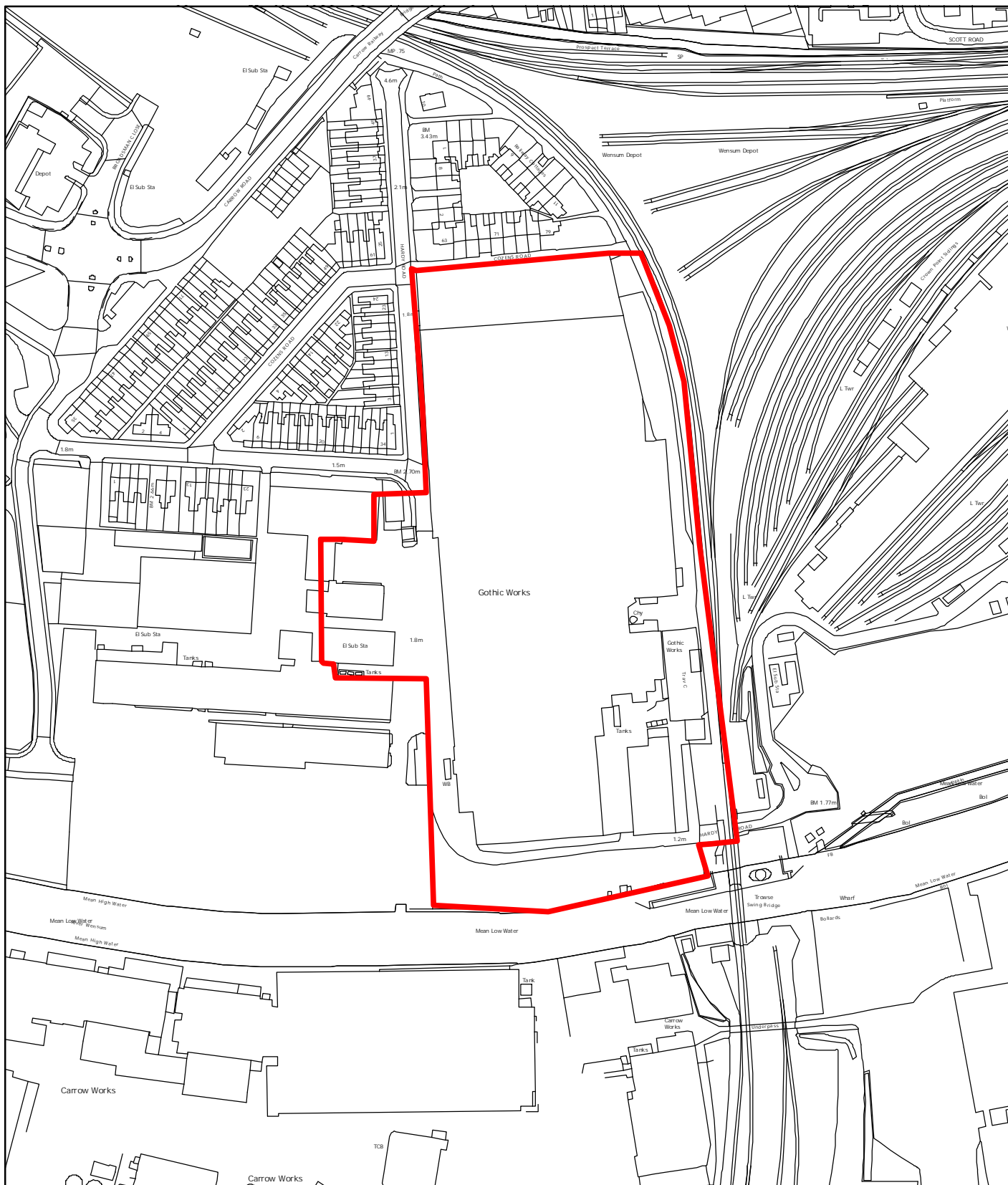
Public spaces	Green Spaces, Norwich City Council	<p>Size for play area not stated nor bed spaces provided to assess size required. Need for consideration of shade provision in children's play area.</p> <p>Tall building at southern end casts shade up the open space, closes in the development rather than giving views to the south.</p> <p>Play area should be relocated to be used by visitors to café rather than just residents.</p> <p>Road circles play area & relocation may resolve this.</p> <p>Reed bed a good idea – provision of bridges could enhance play but concern over miss-use by students.</p>
Demand for sporting facilities	Sport England	<p>Demand for outdoor facilities calculated at need to provide 1.2ha of sports pitches/facilities = 1 senior sports pitch plus a multi-use games area. Unreasonable to require on-site provision, therefore commuted payment required of £150,000.</p> <p>Demand for indoor community sports facilities not sufficient to justify on-site provision but will generate demand that can be calculated as requiring a contribution of £323,194 towards off-site provision. Therefore combined contribution of £473,194 can be justified towards off-site provision for indoor and outdoor sports facilities and pitches. Object to proposal if contribution not secured.</p>
Sustainability / Reduction of CO2 emissions/ renewable energy/ water efficiency	<p>EERA</p> <p>Anglian Water</p>	<p>Proposals promote a sustainable development, recognising requirements for low or zero carbon developments and incorporating renewable sources of energy within the design. Possible measures identified within proposals</p> <p>Sufficient water resource capacity to supply the development but would want to see buildings constructed to high water efficiency standards</p>

	Environment Agency	<p>Proposed layout drawing indicates two biomass plants proposed on-site but ES does not include any details of these proposals. Clarify and provide supporting information</p> <p>Lack of information re energy and water efficiency and waste management – requirement under LP policies EP16 & EP18. Clarification required and details submitted prior to determination.</p>
Sewerage	Anglian Water	<p>Assets close to or crossing the site. Layout should take this into account or assets diverted.</p> <p>Advise that wastewater treatment would take place at Whittlingham STW which is at capacity. Improvements not planned to commence until 2011 at very earliest. Therefore recommend that planning approval is delayed until improvement works have been completed.</p>
Flood Risk	<p>Environment Agency</p> <p>Network Rail</p>	<p>Submitted FRA not adequately assessed flood risk. Object: inadequate sequential test; risk of fluvial flooding not been adequately assessed; risk of flooding from surface water run-off not been adequately assessed</p> <p>Additional or increased flows of surface water must not be discharged onto Network Rail land nor into Network Rail's culverts or drains. Soakaways should not be constructed within 10m of the boundary</p>
Fire hydrants	Norfolk County Council, Planning obligations	1 hydrant per 50 dwellings required at a cost of £631 per hydrant and 1 hydrant for the commercial elements at a cost of £737, all to be covered by condition
Contamination	Environment Agency	Insufficient assessment of the risk to controlled waters has been made and object - level of risk unacceptable and a lack of assurance that risks of

	<p>Environmental Health, Norwich City Council</p> <p>Letter of representation</p>	<p>pollution are identified and measures for dealing with them have been devised. In accordance with PPS23, application should not been determined until this is resolved.</p> <p>Insufficient information provided – additional site investigation required. Contamination needs to be fully identified and a remediation scheme devised as part of ES</p> <p>Strong concern about possible contamination of aquifer. Essential to ensure that this does not occur nor that surface water is contaminated. Could have very serious consequences for operation of neighbouring site.</p>
Health & Safety	Health & Safety Officer, Norwich City Council	<p>Corporately the Council is concerned about river safety. Development proposes housing for students and people with special needs (potentially vulnerable groups). Railings along the perimeter may be required.</p> <p>Fencing adjacent to railway?</p> <p>Surface materials for delivery areas for shops and café need to be carefully considered to avoid risks – re access paths and roadways.</p> <p>Detailed design of dwellings should allow for appropriate space for furniture delivery.</p>
Noise	Environmental Health, Norwich City Council	<p>Dwellings on north, south and east elevation will require supplementary ventilation to achieve recommended internal noise levels. Specification of glazing and ventilator units to be installed is required, including manufacturers stated sound reduction rating.</p> <p>Single aspect scheme for dwelling on east boundary of site is supported as an</p>

	Letter of representation	<p>appropriate noise mitigation measure.</p> <p>Vibration within dwellings – specialist advice for design and construction will be needed</p> <p>Construction noise will need to be managed and the times of working suggested exceed those usually allowed</p> <p>Strong concern about the possibility of noise generated by an existing adjoining use becoming the subject of complaints should a residential development of the site go ahead, particularly with regard to development adjacent to the river and especially concerning high-rise development in this location – where no visual or sound barrier from operational buildings.</p>
Air quality	<p>Environmental Health, Norwich City Council</p> <p>Letter of representation</p>	<p>Dust emission caused by demolition of existing structures is a concern and not covered in ES. Methods for control need to be submitted and assessed and form part of an approved Environmental Management Plan.</p> <p>Strong concern re possibilities for airborne pollution and dust from the demolition of the buildings proposed. Could have very serious implications for the operation of an adjoining site.</p> <p>Current operation of neighbouring site can omit odours. Concern that future residential use of site could result in complaints in this regard, prejudicing the operation of that site.</p>
Lighting	<p>Environmental Health, Norwich City Council</p> <p>Letter of representation</p>	<p>No information on lighting has been provided and should form part of ES</p> <p>Concern that the operation of a neighbouring use which involves night-time working and lighting could become the source of complaints for future residential occupiers of the development.</p>

Plant machinery & ventilation systems	Environmental Health, Norwich City Council	Although precise details can be considered at a later date, indicative positions and specifications for car park ventilation outlets are required. No details have been provided of this or of details relating to other units as part of proposal/ES
--	--	---



© Crown copyright. All rights reserved. Licence No. 100019747 2004

Planning Application No - 08/00034/O

Site Address - Gothic Works Hardy Road

Scale - 2500



NORWICH
City Council

DIRECTORATE OF REGENERATION
AND DEVELOPMENT

