

**Report to** Planning applications committee

**Item**

9 August 2018

**Report of** Head of planning services

**Subject** Application no 18/00504/O - St Peters Methodist Church, Park Lane, Norwich, NR2 3EQ

**4(c)**

**Reason for referral** Called in by an elected member

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<b>Ward:</b>	Nelson
<b>Case officer</b>	Maria Hammond - <a href="mailto:mariahammond@norwich.gov.uk">mariahammond@norwich.gov.uk</a>

<b>Development proposal</b>		
Outline application including matters of access, for demolition of the Church Hall, Welcome Room and Boys Brigade, conversion of main church and erection of new dwelling(s) with associated external works.		
<b>Representations</b>		
Object	Comment	Support
27	2	0

<b>Main issues</b>	<b>Key considerations</b>
1	Principle: provision of housing and loss of community facility
2	Heritage impacts
3	Design
4	Landscaping and open space
5	Acceptability of access, traffic and parking
6	Amenity
7	Flood risk
8	Affordable housing
<b>Expiry date</b>	14 August 2018
<b>Recommendation</b>	Refuse

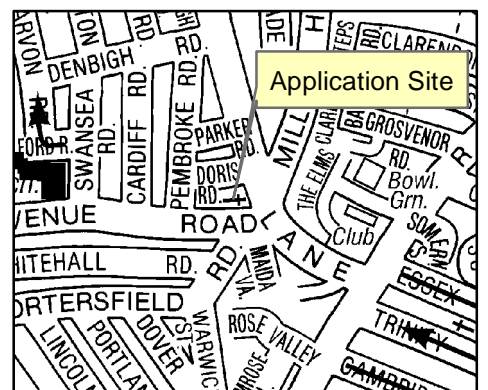


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Planning Application No 18/00503/O & 18/18/00504/O  
 Site Address St Peters Methodist Church Park Lane  
 Scale 1:1,000



**NORWICH**  
 City Council  
 PLANNING SERVICES



## The site and surroundings

1. St Peters Methodist Church is a prominent and locally listed building within the Heigham Grove Conservation Area. Originally there was an older Wesleyan chapel on the site which now forms the church hall to the immediate north of the main church building. The western part of the site also features the Boy's Brigade building which was built around or just after the first Methodist church.
2. The local listing is as follows:  
"1939. Buff brick with brown brick detail to windows. Designed by local architect Cecil Yelf in a simple but monumental style.  
*Importance: Important community and landmark corner building in a style evocative of its time*".
3. The main Methodist church building is typical of the interwar 1930s style. Brown brick features heavily along with strong horizontal and vertical lines. Geometric shapes heavily influence the design. The windows are leaded with brick mullions and reveals. Some stained glass also features which depicts Christ flanked by St Peter and St John. The rest of the materials which feature within the church are largely of a high quality including the organ cover screen which features fine fretwork cut into the timber.
4. The adjacent church hall was formerly a Wesleyan Chapel and was built by Edward Boardman in 1894. It was completely refaced with modern buff brick in the 1960s. Some of the original gault brickwork can still be seen at lower levels along with elements of the rear façade. The Boys Brigade building shares some features with similar detailing to the original chapel as it was also built to Boardman designs in the early twentieth century. This single storey building fronts Avenue Road with a symmetrical elevation.
5. Several later additions have been added to the buildings including a mid to late 20th century flat roof extension to the rear of the hall and also to the front. A linking extension and new entrance was built during the 1990s which linked the Methodist Church to the Church hall.
6. The surrounding area is characterised by late 19th century terraced properties along with later early 20th century development to the south and south west. There is some street planting on the surrounding streets and significant views. It is located within sub area 'H' as identified within the Conservation Area Appraisal which is largely made up of medium size buildings. The main Methodist church is identified as a significant local landmark and the position of this group of buildings at the junctions of Park Lane, Avenue Road, Mill Hill Road, Maida Vale and Portersfield Road with levels dropping towards the site from Unthank Road and The Avenues results in positive views towards this prominent site from many aspects.
7. The buildings are separated from the street frontage by landscaping and an historic dwarf wall and railings along Avenue Road and by car parking on the Park Lane frontage.
8. There is a significant change in levels across the site with the external ground levels dropping a full-storey height from east to west.

## Constraints

9. St Peters Church is a locally listed building and the site is in the Heigham Grove Conservation Area. The site is also in a critical drainage catchment and parts of the site and surrounding area are at risk of surface water flooding in the 1 in 30, 1 in 100 and 1 in 1000 year events.

## Relevant planning history

10.

Ref	Proposal	Decision	Date
4/1989/0886	Infill of yard area at front of church.	Approved	30/11/1989
15/01928/F	Demolition of modern extensions and conversion to provide 20 residential units (class C3).	Refused	21/07/2017
18/00503/O	Outline application including matters of access, for demolition of all buildings on site, erection of up to 10 dwellings, formation of new access road from Avenue Road with associated external works.	Pending	
18/00962/F	Change of use from D1 (place of worship) to C3 (dwelling houses). Demolition of modern extensions, removal of two trees, and general redevelopment of site to provide 20 new residential units and associated landscaping and parking.	Pending	

It should be noted that the refusal of application 15/01928/F is currently the subject of an appeal, application 18/00503/O is the subject of a report elsewhere on this agenda and application 18/00962/F (a re-submission of 15/01928/F) is pending consideration.

## The proposal

11. This is an outline application with all matters reserved except for access. It is proposed to demolish the church hall and Boys' Brigade building, retaining only the main church building. This would be converted to dwellings and new build is also proposed on the remainder of the site to provide up to ten dwellings in total. An indicative plan shows one new detached dwelling in the northeast corner of the site, adjacent to the end of the Park Lane terrace.
12. Access would be from Avenue Road and the indicative layout shows a parking court to the west of the site and off-street parking off Park Lane.

## Summary information

Proposal	Key facts
<b>Scale</b>	
Total no. of dwellings	Maximum 10
No. of affordable dwellings	0
Total floorspace	Up to 1000 square metres
No. of storeys	Up to 4 in converted church, new build two storey
Density	Maximum 66 dwellings per hectare

## Representations

13. Advertised on site and in the press. Adjacent and neighbouring properties have been notified in writing. 29 letters of representation have been received citing the issues as summarised in the table below. All representations are available to view in full at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Issues raised	Response
Density too high and not in keeping with Conservation Area	See main issue 3
Lack of parking (one comment that there is too much parking proposed)	See main issue 5
Loss of light and loss of privacy	See main issue 6
Disturbance, loss of privacy and overlooking from use of external terraces	See main issue 6
Poor design	See main issue 3
Out of scale for area and overpowering	See main issue 3
Flood risk	See main issue 7
No public amenity/green space/play area	See main issue 4
No environmental compensation and not built to high environmental standards	See table at paragraph 134
Standard of amenity for future occupants, including no/insufficient external amenity space and unsuitable for families or elderly	See main issue 6

<b>Issues raised</b>	<b>Response</b>
occupiers	
Loss of community amenity	See main issue 1
Church is of no architectural merit and objections to its retention which compromises the redevelopment of the site	See main issue 2
Preferable to original proposal (15/01928/F)	Noted. Each scheme is considered on its own merits.
Would prefer proposal to demolish all buildings and redevelop the whole site (application 18/00503/O)	Noted. Each scheme is considered on its own merits.
Safety at junction	See main issue 5
Appearance of bins	See main issue 3
No affordable housing	See main issue 8

## Consultation responses

14. 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.

### Design and conservation

15. The application site is located in the Heigham Grove Conservation Area which is characterised by predominantly residential detached and terraced houses interspersed with some prominent religious buildings (Catholic cathedral, St Peters Church etc) and other commercial buildings (mostly public houses). The area has an attractive sub-urban character indicative of the 19C-20C expansion of Norwich.
16. The site contains a historic grouping of Methodist buildings which date from between the late 19C-early 20C with 21C additions.
17. Perhaps surprisingly, Boardmans Old chapel is the oldest building on the site, constructed in 1894 when the Methodist congregation expanded from their church in Lady Lane within the city centre. The building also presents a strong visual presence and massing fronting Avenue Road - its gault brick gable end and pitched roof form echoing St Peters in views from Park lane (south). The building benefits from historic heritage value and significance as a result of its associative heritage value (with the Methodist church & the named local architect Boardman). However, the 1960's re-facing and renovations have severely affected its internal and external appearance, which has reduced the buildings aesthetic heritage value and architectural integrity. The building is considered to have a positive impact upon the character and appearance of the conservation in its current form.

18. The most prominent building on the site is the Methodist chapel - St Peters Methodist chapel which is a locally listed non-designated heritage asset which contributes to the character and appearance of the conservation area. St Peters was built alongside Boardmans Old chapel in 1939 when the remaining congregation in Lady Lane transferred to this site. The original church was refaced in the early 1960s and converted into a church hall.
19. The building was constructed in 1939, built in buff brick with brown brick canted window details and leaded lights and neo-classical proportions. The simplicity of the elevations means that it is relatively sensitive to change. The building was constructed to the designs of local architect Cecil Yelf in a simple but monumental style very evocative of its time. The building is an important community and landmark corner building. Situated on a relatively busy junction - this impressive and imposing landmark building terminates views along 5 different roads: Park Lane, Avenue Rd, Portesfield Rd, Maida Vale and Mill Hill Road. St Peters benefits from 'aesthetic, historic and social/communal' heritage value and significance to varying degrees.
20. The Sunday school / Boys Brigade building was constructed in early 20C to the design of local architect Boardman. This modest single storey building with a rectangular plan and pitched roof, constructed in Costessey gault brick and Welsh slate. The building presents an attractive and symmetrical elevation to the street with a three-centred arched entrance fronting Avenue Road and attractive timber framed fenestration and a tall chimney stack to the service alley to the rear of Avenue Road and Doris Road.
21. The fenestration is plain of mullions and transoms in timber with glazing bars. The heads are of short soldier arches (headers on edge). The building has a typical modest 19C Norfolk Methodist chapel architectural style/form with classical proportions and modest character.
22. This modest building forms part of the historic chapel grouping and is indicative of the congregations' expansion and use over time. The building benefits from 'aesthetic, historic and social/communal' heritage value and significance to varying degrees. The building is considered to positively contribute to the character and appearance of the conservation area.
23. The historic dwarf wall, railings, gates, piers and caps fronting Avenue Road also contribute to the character and appearance of the conservation area.
24. It should be noted that the application is lacking the following information:
  - No demolition drawings,
  - No proposed floor plans indicating the internal layout of St Peters
  - No internal sectional drawings indicating the impact of new floor levels upon the external appearance of the building
  - No details drawings of the alteration of the existing fenestration have been submitted.

It is therefore difficult to fully assess the true impact of the proposals.

25. The proposed loss of the Boys Brigade building and associated front boundary wall and railings and their replacement with an unusually large open entrance way and with car parking spaces would harm of the character and appearance of the conservation area.
26. The loss of Boardmans old chapel and the development of a replacement 2 storey detached house in replacement is not considered to be an improvement upon the existing context and would result in harm to the character and appearance of the conservation area, whilst the Boardman Old chapel has been altered, the prominent gable end is of some aesthetic and historic heritage value and significance (in that its prominent gable and pitched roof form fronting Avenue road echoes the strong gable of St Peters forming part of a familiar and cherished local scene and the cumulative impact of the chapel grouping are indicative of the historic use of this part of the city for Methodist worship. The loss of this structure would result in harm to the character and appearance of the conservation area as a result.
27. The development of a modest 2 storey detached house in replacement is not considered to be an improvement upon the existing context. The proposed detached house with horizontal proportions to its elevation and no front boundary would be an incongruous addition, at odds with the prevailing terrace house form in this sub-character area of the conservation area.
28. As no demolition drawings and proposed internal sectional drawings have been submitted, it is not clear how the building will be adapted to allow for the proposed residential use. It is not clear how the new floor levels will be inserted into the building; or how the works will affect the external appearance of the building. It is regrettable that the original stained glass windows (possibly artist Frances Skeet) will be lost.
29. It is not clear how the existing highly sensitive window reveals will be adapted to allow access and egress to the proposed roof terraces and escape routes and no information has been provided to indicate that the works will meet with the requirements of the building regulations. The existing tall windows feature canted brick mullions and leaded lights, these would need to be drastically altered, the canted mullioned being cut and removed to accommodate new door openings. The existing unusual frameless leaded lights would be lost altogether. The proposal to cut out the wall beneath one of the window openings fronting Avenue Road to allow for a means of escape doorway is the most insensitive new opening. The proposed opaque glass balustrades will serve to obscure and alter the sensitive and simple proportions and appearance of the western elevation. The works proposed will detrimentally affect the buildings surviving aesthetic heritage value and harm to the buildings architectural integrity.
30. The proposed drawings do not indicate how the new services to facilitate all the new flats (boiler flues and ventilation, aerials etc) will be accommodated without harm to the external appearance of this sensitive historic church.
31. The proposals will result in the wholesale loss of the Sunday school building and the Boardmans Old Chapel, albeit not statutorily or locally listed buildings they have been identified during the course of the application to be heritage assets that benefit from local significance. They are considered to positively contribute to character and



appearance of the conservation area. The loss of these heritage assets will therefore cause 'less than substantial' harm to the character and appearance of the conservation area (a designated heritage asset).

32. The alterations to the external appearance of St Peters church and boundary treatment and the development of a new detached dwelling will also cause 'less than substantial' harm. Harm identified is '*less than substantial*', does not mean that it is inconsequential. Every effort should be made to mitigate harm.
33. At present, due to the lack of information and justification the works are not considered to meet with the requirements of Policy DM9 of the Local Plan which requires that development resulting in harm to or loss of significance of a locally identified asset will only be acceptable where: a) there are demonstrable and overriding benefits associated with the development; and b) it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development.
34. In addition the proposals fail to meet with the requirements of the NPPF Chapter 16, in particular Para 189 requires applicants to provide sufficient information to allow the Local Planning Authority to understand the potential impact of the proposal on the significance of heritage assets
35. At present, I consider the application to be lacking the necessary level of detail to assess the full impact of the proposals. Insufficient information has been provided.
36. The resulting development would not make a positive contribution to the local character and distinctiveness. There does not appear to be clear and convincing justification for the proposals contrary to para 192 and 194 of the NPPF.
37. Will the works result in 'less than substantial' to the character and appearance of the conservation area. Paragraph 196 of the NPPF requires that harm be offset by sufficient public benefits. It is questionable as to whether it has been demonstrated that the current proposals represent sufficient 'public benefits' to outweigh the harm caused to the heritage assets.

### **Historic England**

38. Summary: This application proposed the conversion of the existing church and demolition of the church hall and former Boys' Brigade Hall on a site in the conservation area to make way for the erection of new houses and associated car parking. The buildings proposed for demolition of historic interest and make a positive contribution to the significance of the conservation area. We would support their adaptation and reuse but would object to the demolition which would result in harm to the historic significance of the conservation area in terms of the National Planning Policy Framework.
39. Recommendation: Historic England objects to the application on heritage grounds. We consider that the application does not meet the requirements of the NPPF (2012), in particular paragraph numbers 6, 7, 14, 17, 132 and 134. In determining this application you should bear in mind the statutory duty of 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. Your authority should take these representations into account in determining the application.

### **Environmental protection**

40. No comments.

### **Highways (local)**

41. No objection in principle on highway grounds. The proposed layout of the site and means of access via Avenue Road are acceptable.
42. Traffic generation from the site will be low (most residential dwellings average 4 trips per day), and the adjacent roads are 20mph with traffic calming. It is acceptable for parking on plot for those on Park Lane and to reverse onto the highway. The means of access to Avenue Road is acceptable and would need the footway strengthening as a vehicle access.
43. I do have concerns that the parking to the rear will be difficult to use, it would be helpful if the applicant did tracking analysis of vehicle movements. It is likely that they would need repositioning and the spaces parallel to the side flank wall of the dwellings facing Avenue Road may need lengthening to make them usable.
44. As new build dwellings in a controlled parking zone it is council policy not to allow parking permit entitlement.
45. We would need information about bin and bike storage. We would need a construction management plan as a condition.

### **Landscape and Ecology**

46. 2 prominent street trees (Lawson Cypress), which represent the largest trees along this section of Avenue Road, are in good condition with 20+ year life expectancy, are protected by the conservation area status and make a significant contribution to the street scene in an area where there are fewer street trees. The removal of these trees is unlikely to be compensated for by the proposed replacement tree planting as the space available is insufficient to allow trees to grow to any stature. There is enough space in the proposed layout for one relatively small tree on the corner.
47. Whilst the existing apron around the buildings on the Park Lane frontage is an unattractive area of asphalt, this is out of character with Park Lane and other local streets which typically feature boundary walls and hedges. Redevelopment of this site should take the opportunity to address this issue.
48. The existing low wall topped with railings together with capped brick gate piers along the Avenue Road frontage are attractive features. This boundary should be retained as far as possible and any new boundary treatment should match the existing as closely as possible.
49. External amenity space for residents is limited.
50. If trees are removed this should be undertaken outside the bird nesting season.

### **Norfolk Historic Environment service**

51. Consider it unlikely there would be any below ground implications.

### **Norwich Society**

52. We have consulted with the local residents' group who expressed the hope that the Norwich Society might reconsider our support for the local listing of St Peter's. The key passage reads: 'Importance: Important community and landmark corner building in a style evocative of its time'. However now, with the loss of the church hall, the building has no value for the community. The committee which prepared the recommendations did not consider that the church itself had intrinsic architectural merit. In fact it is the residents' view that its size and position restricts street views, making the junction more dangerous because of the traffic, especially during the school run in the morning and afternoon collection.
53. We discussed both schemes (18/00503/O and 18/00504/O) at our Committee, and concur with the views of the residents, i.e. we would not object to its removal from the local list and its demolition, if that achieved a better architectural solution for the site as a whole.
54. However we note that a new detail application has been submitted (18/00962/F) which is also based on retention of the church, and represents an improvement from the initial outline scheme (18/00504/O). The vertical split of the space into 3 and 4 storeys units gives unusual and attractive units, especially with the benefit of the voids and roof terraces. We would be happy to support this scheme if the developer is intending to retain the existing buildings.

### **Tree protection officer**

55. The two Lawson sp trees at Avenue Road contribute to the amenity of the local area, however, I have no objection to the removal of these two trees given the number and location of replacement planting proposed.

### **Anglian Water**

56. The foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have capacity for these flows. The sewerage system at present has available capacity for these flows.
57. From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management.

### **Lead Local Flood Authority**

58. Initial response (14 June 2018):

We object to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy relating to:

- The development changing vulnerability categories from less (a community building) to More Vulnerable (Housing) is at risk of flooding from surface water with no evacuation / emergency plan provided.
- As the drainage scheme is located within an area at risk of flooding, it is not clear how the drainage scheme proposed will only take on site runoff and be designed with a surcharge outfall to operate as suggested during the design flood event and not be overwhelmed from water from offsite.
- There is only one proposal for the discharge of surface water from this site but Anglian Water have not suggested this is acceptable in principal, what the current discharge rate from the site is and how the development is not increasing flood risk elsewhere.
- The supporting calculations do not support the current proposal and hence further surface water runoff storage may be required and it is not clear where these could be located considering constraints on the site.
- The lack of outline management and maintenance plan

#### Reason

To prevent flooding in accordance with National Planning Policy Framework (2012) paragraph 103 and 109 by ensuring the satisfactory management of all sources of flood risk, storage and disposal of surface water from the site in a range of rainfall events to ensure the development is safe for its lifetime, does not increase the flood risk elsewhere and surface water drainage system operates as designed for the lifetime of the development.

59. This response identified that the LLFA would consider reviewing their objection if a number of issues are adequately addressed. Additional information was subsequently received and the LLFA were re-consulted.
60. Their revised response advises:
61. We maintain our objection to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy and our comments in our letter 14 June (FWP18/4/6410) still stand.
62. We note that from your email to the LLFA dated 25 June 2018 that you are satisfied that 8 dwellings can be accommodated within the main church through conversion. We would advise that two dwellings would have to be located within the area currently indicated for one detached new dwelling to ensure that the sequential approach to development within the boundary is followed.
63. We have reviewed the letter from Richard Jackson Engineering dated 4 July 2018. This contains no further technical information for us to review. We note that the letter contains an argument for conditioning all the outstanding information. We do not feel this is appropriate at this time as the information we request is likely to influence the number and arrangement and character of dwellings achievable at this location.
64. Regarding the drainage runoff rates, we acknowledged that we agreed rates in 2016 on a separate application but we now request that these rates are Greenfield or as close to. This is considering the location in the Critical Drainage Catchment,

Norwich City Council Policy DM5 and updated Anglian Water Protocol on redevelopment. As the rates proposed are brownfield and we are yet to agree a runoff rate and volume associated we do not suggest that a condition is set.

65. We again request that your emergency planner is consulted and comment on new dwellings regarding hazards of a development which may have up to 0.9m deep of flood water on it. As there details on how this water will be managed or comment on we can be available to discuss the current information with your emergency planner if they require.

### **Emergency Planning**

66. I note the LLFA have raised a number of concerns regarding the application, including reference to a flood response plan/resident awareness they are at risk of surface water flooding to consider appropriate preparedness in such an event. At this stage, I have no further comment to add.

## **Assessment of planning considerations**

### **Relevant development plan policies**

67. **Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS)**
- JCS1 Addressing climate change and protecting environmental assets
  - JCS2 Promoting good design
  - JCS3 Energy and water
  - JCS4 Housing delivery
  - JCS6 Access and transportation
  - JCS7 Supporting communities
  - JCS12 The remainder of the Norwich urban area including the fringe parishes
  - JCS20 Implementation
68. **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
  - DM9 Safeguarding Norwich's heritage
  - DM11 Protecting against environmental hazards
  - DM12 Ensuring well-planned housing development
  - DM13 Communal development and multiple occupation
  - DM22 Planning for and safeguarding community facilities
  - DM28 Encouraging sustainable travel
  - 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**

### **69. Relevant sections of the Revised National Planning Policy Framework July 2018 (NPPF):**

- NPPF2 Achieving sustainable development
- NPPF5 Delivering a sufficient supply of homes
- NPPF8 Promoting healthy and safe communities
- 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

### 70. Planning Practice Guidance

### 71. Supplementary Planning Documents (SPD)

- Affordable housing SPD adopted March 2015
- Trees, development and landscape SPD adopted June 2016

## **Case Assessment**

72. 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 Framework (NPPF), the Councils 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.

73. A previous application on this site (15/01928/F) proposed the retention and conversion of the church, church hall and Boys' Brigade building to dwellings. This application was ultimately refused and is currently subject of appeal. The sole reason for refusal concerned the contribution to affordable housing provision and the proposal was considered acceptable in all other respects. Indeed, it was at one point recommended for approval. Therefore whilst there is not an extant permission for redevelopment of the site, the existence of a largely acceptable scheme which involved the loss of the community use and provision of housing on the site is a material consideration which carries some weight in the determination of this application. There have been no changes to either the circumstances of the site or the development plan since the determination of that application. The Revised NPPF, published on 24 July 2018, is a new material consideration, superseding the 2012 NPPF.

## **Main issue 1: Principle of development**

### **Principle of new residential development:**

74. Key policies and NPPF paragraphs – DM12, DM13, Revised NPPF paragraphs 59 and 11.
75. Paragraph 59 of the Revised NPPF identifies the importance of a sufficient amount and variety of land coming forward where it is needed to significantly boost the supply of housing and DM12 support new housing which will help to meet housing needs in the city. The site is located within an established residential area, with regular bus services located nearby, and is adjacent to the Unthank Road local retail centre and within walking distance from the city centre. Future residents would be well supported by a wide range of local services and facilities available in the adjacent Unthank Road local centre and in the city centre which is within walking distance of the site.
76. None of the exception criteria of Policy DM12 apply here and new residential development at the site is therefore acceptable in principle, including conversion to provide flats, subject to other material planning considerations and policies discussed below.

### **Principle of loss of community use:**

77. Key policies and NPPF paragraphs – DM22 and NPPF Revised paragraph 92.
78. Following a decline in congregation numbers to the 30s, services at the Church ceased in December 2013 and the congregation was merged with that at Jessop Road United Road Reform Church. A regular congregation of around 200 and significant investment would be required to bring the church back into use and sustain it. The merged site at Jessop Road and another Methodist church at Chapelfield Road are both around 1km from the site and offer alternative provision.
79. An extensive marketing campaign for what is considered a ‘meaningful period’ in compliance with Policy DM22 was undertaken for the premises as a church/community hall with potential for a range of alternative uses. This did not attract interest for a church or community use and the lack of interest was attributed to the costs of necessary repairs and ongoing maintenance commitments which would likely make a community use unaffordable.
80. This matter was considered extensively with application 15/01928/F and the circumstances have not changed. It is considered that the loss of the community use has been sufficiently justified with regards the requirements of Policy DM22.

## **Main issue 2: Heritage**

81. Key policies and NPPF paragraphs – DM9, Revised NPPF paragraphs 189-202.
82. The site is located within the Heigham Grove Conservation Area, a designated heritage asset, which is characterised by predominantly residential detached and terraced dwellings interspersed with prominent religious buildings, including the Catholic Cathedral of St John the Baptist, and other commercial buildings such as

public houses, generally on prominent corner sites. The suburban character of the area is indicative of the nineteenth and twentieth century expansion of Norwich.

83. The group of religious buildings that comprises the application site date from the late nineteenth and early twentieth centuries (with later twenty-first century additions and alterations) and sit at a prominent road junction surrounded by residential development of the same period. The site is therefore typical of and positively contributes to the form of development that characterises the Conservation Area.
84. Of the three buildings, the main church is the most prominent by virtue of its scale, position and monumental architectural style. It is locally listed and therefore a non-designated heritage asset. The listing cites its importance as a community and landmark building, evocative of its time. Some representations have suggested that if it is no longer in community use, the reasons for its local listing no longer apply and its retention is not justified. However, when assessed for local listing, a building must satisfy a number of criteria which, along with community importance, include townscape, architectural and historical values. St Peters Methodist Church is of more than just community value, as confirmed by the local listing description, and its significance as a heritage asset is also in its aesthetic and historic values. Its monumental style is evocative of its construction in the 1930s and it has neo-classical proportions with simple elevations. It also has an association with local architect Cecil Yelf (a senior partner of Edward Boardman and Son who had associations with the Methodist church) and features stained glass thought to be by renowned glass painter Francis Skeat. Some representations have supported the demolition of the church and the Norwich Society would not object to its removal from the local list and demolition if it achieved a better architectural solution for the site.
85. The original church building which has subsequently been used as the church hall and the Boys' Brigade building are not individually locally listed, however the church hall is the original building of this group and the Boy's Brigade was a subsequent addition marking the expansion of the congregation and use of the site. Whilst the church hall was re-faced and renovated in the 1960s, it retains a strong visual presence and the original gault brick gable end is evident at the rear. It has historic significance as a result of its association with the development of the Methodist church and design by local architect Edward Boardman. The 1960s alterations have reduced its aesthetic significance and architectural integrity, however the large massing and form, which echo the strong gable end of the later church, make a positive contribution to the character of the Conservation Area and form part of a familiar local scene.
86. The Boys' Brigade building is the smallest of those on the site in plan and height and its modest architectural scale and form with classical proportions is typical of nineteenth century Norfolk Methodist chapels. It has aesthetic, historic and social communal significance and is considered to positively contribute to the character and appearance of the Conservation Area. The dwarf walls and railings on the Avenue Road frontage also make a positive contribution.
87. A structural assessment undertaken in support of the previous conversion scheme found all the buildings were capable of conversion. The porches to the both the main church and Boys' Brigade buildings have suffered from some localised



subsidence and it is proposed to investigate and address this to retain the main church porch, however it has not been suggested nor demonstrated that it is not viable to retain the church hall or Boys' Brigade building. The objective of the proposal to retain the church and redevelop the rest of the site is said to be to maintain the character and appearance of the church while being influenced by the objections to the previous conversion scheme in respect of density, massing, amenity space, flood risk, daylight and sunlight, bin and cycle storage and parking.

88. A Heritage Impact Assessment has been submitted which considers the church to be the only building of significance on the site and that its conversion and clearance of the 'clutter' of outbuildings would reveal its architectural quality and make a definite positive contribution to the Heigham Grove Conservation Area. It is proposed to preserve a historical record of the building and preserve or re-locate key artefacts where appropriate.
89. As assessed above, both the church hall and Boys' Brigade building have aesthetic, historic and social communal significance and positively contribute individually and as part of the group to the character and appearance of the Conservation Area. The loss of these buildings would affect a familiar local scene and erode this chapel grouping which is indicative of the historic use of this part of the city for Methodist worship; it would cause harm to the character and appearance of the Conservation Area.
90. The Revised NPPF sets out that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and Policy DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets. The Revised NPPF requires harm to or loss of significance of designated heritage assets to be justified and the degree of any harm or loss must be assessed. Whether the potential harm to significance of a designated heritage asset is substantial, total loss of less than substantial harm, paragraph 193 requires that great weight should be given to the conservation of the asset. Furthermore, in accordance with the *Planning (Listed Buildings and Conservation Areas) Act 1990* there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
91. In this case it is considered that the proposed demolition of the church hall and Boys' Brigade building which positively contributes to the character and appearance of the Conservation Area would harm that designated heritage asset and that harm has not been justified in the application. In terms of the degree of harm, it is considered to be less than substantial and the Revised NPPF requires that less than substantial harm is weighed against the public benefits of the proposal, including securing the optimum viable use of the asset.
92. Whilst the application only affects a relatively small area of the overall Conservation Area asset, it is a prominent and significant site. The optimum viable use of an historic building is usually the one which it was designed for, however it is accepted here that there is no longer a viable faith/community use. In terms of public benefits, the proposal would deliver up to ten dwellings to contribute towards local housing need. However, as this is an outline proposal, the impact of the conversion and contribution that new build development on the remainder of the site would make to the character and appearance of the Conservation Area can neither be

assessed nor secured in the determination of this application. The indicative layout shows the area of the Boys' Brigade building becoming an unusually large entrance way and requiring loss of a section of the historic wall and railings and in place of the substantial church hall there would be a detached two storey house which is indicated to have proportions and fenestration incongruous with the surrounding pattern of development. In principle the new build development could be designed to positively respond to local character, there can be no certainty in the determination of this outline application that this would make an equal or greater contribution to the Conservation Area to compensate for the loss of the existing buildings. With regards mitigation, the interpretation and conservation measures are not considered significant. As noted by Historic England, it has not been demonstrated that it is necessary to demolish these buildings and cause harm to the Conservation Area to deliver new housing on the site.

93. Whilst the retention of the church and its conversion to dwellings can be welcomed in principle, as an outline application no details have been provided of the conversion and what would be required internally and externally to facilitate this nor the full extent of demolition. The conversion scheme (subject of applications 15/01928/F and 18/00962/F) demonstrates one way this building could be converted and in that respect conversion is considered achievable in principle. Whilst insufficient information has been submitted to assess the degree of harm that conversion may cause at this stage, given that a form of conversion has been considered to be acceptable in heritage terms previously, it is considered feasible for an acceptable form of development to come forward at reserved matters stage and for any alternative proposals to be considered on their merits/demerits at that stage.
94. It is appreciated that there is some local support for the demolition of this whole group of buildings and they are not universally regarded as having aesthetic value or being worthy of retention. Indeed representations have referred to a preference for application 18/00503/O (subject of a report elsewhere on this agenda which should be determined on its own merits) which proposes demolition of all buildings. Whilst these views are understood and appreciated, when considered against the Revised NPPF and development plan policies, the loss of two components of this significant group of buildings is considered to cause harm to a designated heritage and likely harm to an undesignated heritage asset and it has not been demonstrated that this harm is outweighed by any public benefits of the proposal. Historic England's objection to the application on the basis of the harm to significance of the Conservation Area must also be taken into account and it is concluded that the impact on heritage assets is unacceptable and contrary to paragraphs 192, 193, 196 and 197 of the Revised NPPF and Policy DM9.

### **Main issue 3: Design**

95. Key policies and NPPF paragraphs – JCS2, DM3, Revised NPPF paragraphs 124, 127-131.
96. Scale, layout, appearance and landscaping, including details of the conversion of the church, are reserved matters which, if this outline application is approved, would be considered in a subsequent application. An indicative layout plan shows the provision of one detached new build dwelling to the north of the church, approximately in line with the existing terrace along Park Lane. An indicative elevation shows this having two storeys with a steeply pitched roof.

97. The Conservation Area Appraisal notes that the majority of houses in the Conservation Area are small to medium sized terraces with relatively simple facades which form harmonious groups with a strong sense of rhythm. In principle it is considered that the scale and form of new build dwelling indicated would be broadly in keeping with the prevailing character, however the proportions and fenestration indicated are at odds with the existing terraced houses and would need to be more sensitively designed at reserved matters stage with careful attention paid to the materials also.
98. The church would be converted to provide a total of up to ten dwellings across the site. Notwithstanding the assessment of heritage impacts above, it is considered that, in principle, residential conversion of the church is possible and the indicative layout shows that the remainder of the site could be developed to provide at least one additional dwelling with amenity space and parking. Should the converted church be proposed to provide fewer than eight dwellings, careful consideration would have to be given to how more than one or two new build dwellings could be provided on the remaining area of the site.
99. Representations have raised concern about the density of the development and that it would be out of scale for the area. The site is currently almost entirely covered by the existing buildings and this proposal is likely to result in a much reduced footprint of development and provision of open amenity and parking areas, reducing the overall building coverage. The church is a substantial building and the Conservation Area Appraisal notes its monumental scale, however the indicative plan shows this remaining unaltered in scale and its presence is an established feature in the Conservation Area. The density in terms of the volume of building and number of dwellings is not considered overly high or inappropriate for the area and any new build would be subservient in scale to the retained church.
100. The retention and replacement of appropriate boundary walls and railings could be secured by condition as could the siting, capacity and design of necessary bin and cycle storage. The provision of parking on the Park Lane frontage would have an adverse visual impact on the development and wider area, however this is largely an existing arrangement and sensitive design and materials could mitigate this.
101. It is therefore considered that a scheme for conversion of the church and some new build could, in principle, deliver up to ten dwellings across the site and the precise layout, scale and appearance would be considered at reserved matters stage.

#### **Main issue 4: Landscaping and open space**

102. Key policies and NPPF paragraphs – DM3, DM8, Revised NPPF paragraphs 124.
103. Landscaping is a reserved matter but the indicative layout and lower density of the site from the current situation would allow for some amenity space and appropriate landscaping.
104. Some representations have sought for public amenity space and/or play space to be provided. The indicative layout identifies some areas for private amenity space on site and the details of this would be considered at reserved matters stage. In addition to any amenity space provided on site, the site is located within walking distance to Heigham Park and Chapelfield Gardens which provide high quality public outdoor spaces available for use by future residents.

105. There is no policy requirement for a development of this scale to make new provision for public open space. An indirect contribution would be made through the Community Infrastructure Levy.

### **Main issue 5: Transport, access and parking**

106. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, Revised NPPF paragraphs 012, 103, 108-111.
107. In terms of impact upon traffic flows to and from the site, it is important to note that under the current lawful use, the properties could be used by another faith or community based group, which would carry much higher traffic levels (and parking demand at peak times) than the proposed use. The associated traffic impacts of the proposed use would be comparatively low and would not result in significant highway impacts to the surrounding area.
108. In terms of highway safety, the junction of Park Lane and Avenue Road adjacent to the site does not have any inherent accident problem and is protected by a speed table and 20mph speed limit. Access is the only detailed matter to be considered in this application and there is no highways objection to the proposed arrangement with vehicular access on Avenue Road and off-street parking on Park Lane.
109. The layout submitted indicates 17 parking spaces to eight dwellings. There is local concern that this would be insufficient and put pressure on local on-street parking, however it is considered ample and within standards in accordance with Policy DM31 for up to ten dwellings. Furthermore, the dwellings would not be entitled to parking permits and existing parking restrictions in the area are considered adequate. It is, however, noted that it has not been demonstrated that all parking spaces within the communal car park have sufficient space for manoeuvring and these may require alteration. Should there be any additional new build development, beyond the one dwelling indicated on the submitted plan, this may reduce the available area for parking and turning.
110. The site is highly accessible, located adjacent to a local retail centre, within walking distance of the city centre and c. 220 metres from high frequency bus stops serving the wider area. It also benefits from proximity to several Car Club spaces in the surrounding area as well as being on the Pink Pedalway for cyclists. Given the level of parking on site and high sustainability of the site with alternative travel options, the proposal is acceptable in this respect.

### **Main issue 6: Amenity**

111. Key policies and NPPF paragraphs – DM2, DM11, DM13, Revised NPPF paragraphs 127, 180.
112. It is appreciated that this site is surrounded by residential dwellings on all sides and any development of it must be sensitive to this and not result in any unacceptable impacts on the amenity of neighbouring occupiers. Whilst the full impact on the amenity of neighbouring occupiers cannot be fully assessed at outline stage as the precise layout, scale and design of the conversion and new build dwelling(s) is not known, the indicative layout suggests the site could be developed with up to ten dwellings in a manner that would not result in such impacts. Should outline permission be granted, the representations concerning loss of light and privacy

could be taken into account in the detailed design to mitigate any unacceptable impacts.

113. Representations refer to disturbance, loss of privacy and overlooking from external terraces to the converted church. On the previous detailed scheme, it was not considered these would result in any unacceptable amenity impacts, however the existing church hall would screen views to the north. An assessment would need to be made of the impacts from any terrace on the north elevation without the church hall to screen views at reserved matters stage, however it is considered that any unacceptable impacts could be mitigated through the detailed design.
114. Should outline permission be granted, the representations concerning loss of light and privacy could be taken into account in the detailed design to mitigate any unacceptable impacts.
115. The standard of amenity for future occupiers of the development would also be fully assessed at reserved matters stage and the indicative layout and information from the previous conversion proposal does not suggest there would be any constraints on providing an adequate standard of amenity.

#### **Main issue 7: Flood risk**

116. Key policies and NPPF paragraphs – JCS1, DM5, Revised NPPF paragraphs 155-165.
117. The site is at risk of surface water flooding and this varies across the site with the lower portion to the western side at risk of flooding to a likely depth of up to 1 metre and surface water pooling around the existing buildings. This was a significant consideration in the determination of the previous application for conversion (15/01928/F) and whilst the majority of issues were satisfactorily resolved with mitigation measures, the LLFA maintained an objection to this scheme on the basis they considered it more appropriate to avoid the risk altogether.
118. The LLFA have an objection to this application which has not been overcome with the submission of additional information.
119. In accordance with Planning Practice Guidance, it is not necessary for proposals for change of use to pass the sequential test. It is, however, necessary for the sequential approach to be applied across the site and the most vulnerable elements of the development (the dwellings) must be placed in the areas of lowest risk. The LLFA have objected on the basis that this has not been satisfactorily demonstrated at outline stage as layout is a reserved matter and they consider it would be necessary for two of the ten dwellings to be sited in the area indicated for one new build. This is considered feasible on the basis of the indicative plan and this is the lowest risk part of the site. Only the lower ground floor of the church is at risk and a detailed scheme for the conversion over multiple floors can take account of this in due course.
120. The increase in risk from less to more vulnerable development and absence of an evacuation/emergency plan is also raised. As the precise details of the conversion are not known at this stage, it would be inappropriate to consider an evacuation/emergency plan until reserved matters stage, however it is noted that the previous conversion scheme (15/01928/F) was able to provide safe

access/egress and/or a safe refuge in each dwelling. In relation to the increase in vulnerability, the siting of more vulnerable development in flood risk zone 3 is not unacceptable, subject to passing the Exception Test.

121. To pass the exception test it must be demonstrated that:
  - (a) the development provides wider sustainability benefits to the community that outweigh flood risk; and,
  - (b) a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
122. With regards the sustainability benefits, the provision of up to ten new dwellings is a substantial benefit weighing in favour of this development and considered to outweigh the flood risk which affects only a portion of this site. In terms of the safety and risk on and off site, the development results in a significantly reduced footprint of buildings and hard surfaces across the site which, subject to the detailed design and assessment below, is likely to reduce surface water run-off and thus risk on and off site.
123. The other points of objection relate to more detailed considerations of a surface water management scheme with appropriate run-off rates and the management of off-site risks.
124. With regards run-off rates, it is appreciated that the LLFA would wish to see these at, or as close to, greenfield rates. The LLFA consider it necessary to agree an appropriate rate at outline stage in order for an appropriate scheme to be designed to meet this at reserved matters stage. It is considered that a substantial improvement from the existing situation could be achieved and it would not be inappropriate to leave agreement of an appropriate run-off rate to later consideration.
125. In terms of surface water management, the application suggests opportunities to provide on-site attenuation would be explored in detail at reserved matters stage, however the LLFA have requested information in relation to area required for storage features to demonstrate these are appropriate and achievable within the constraints of the site. An attenuation tank is proposed in the car park area indicated on the submitted plan, however if the number of new build dwellings were to be increase, this may impinge on the available area for and required volume of on-site attenuation.
126. In summary, as an outline proposal it must be considered whether the development is acceptable in principle in flood risk terms. In this case, it is considered that the site is broadly acceptable in flood risk terms and could pass the exception test in accordance with the Revised NPPF and Policies JCS1 and DM5. Whilst the LLFA's objection in the absence of full information at outline stage are appreciated, given the relatively small amount of new build and satisfactory resolution of flood risk matters on the previous proposal for conversion, it is considered that appropriate surface water management and flood risk mitigation measures could be satisfactorily secured with the use of appropriate conditions on any outline permission granted.

127. Representations have commented on the potential inadequacy of the local foul sewer to accommodate the proposed development. Anglian Water have confirmed that the sewerage system and Water Recycling Centre have capacity for the flows generated by the proposed development.

**Main issue 8: Affordable housing viability**

- 128. Key policies and NPPF paragraphs – JCS4, DM33, Revised NPPF paragraph 63.
- 129. The Revised National Planning Policy Framework (published 24 July 2018) advises that the provision of affordable housing should not be sought for residential developments that are not major developments. Major developments, in terms of numbers, are defined as those of ten or more dwellings.
- 130. It is therefore the case that if this site were to deliver ten dwellings, it would be necessary for it to make either on-site provision or a financial contribution in lieu to affordable housing. For less than ten, it is not appropriate.
- 131. The application was submitted prior to the publication of the Revised NPPF and seeks outline consent for up to ten dwellings and up to 1000 square metres of floorspace on the basis of previous Government guidance that contributions to affordable housing and tariff style planning obligations should not be sought from developments up to these limits. The proposal does not make any provision for affordable housing nor demonstrate that doing so would make the development unviable.
- 132. In accordance with the Revised NPPF, JCS Policy 4 and Affordable Housing SPD, if the maximum of ten dwellings were to be proposed on this site, this scale of development should provide 30% affordable housing, subject to adjustment to reflect vacant building credit. In the absence of any proposal or evidence this would not be viable, it must be considered that the proposal is contrary to JCS Policy 4 and paragraph 63 of the Revised NPPF as it fails to deliver an appropriate level of affordable housing. However, should outline permission be granted, it would be necessary for this to be subject to a Section 106 agreement requiring appropriate on-site provision or a financial contribution should a detailed proposal at reserved matters stage propose ten dwellings. No such S106 agreement has been provided.

**Compliance with other relevant development plan policies**

133. 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.

<b>Requirement</b>	<b>Relevant policy</b>	<b>Compliance</b>
Cycle storage	DM31	Yes subject to condition.
Refuse Storage/servicing	DM31	Yes subject to condition.

<b>Requirement</b>	<b>Relevant policy</b>	<b>Compliance</b>
Energy efficiency and renewable energy	JCS 1 & 3 DM3	Should ten dwellings be proposed, it would be necessary for renewable energy sources to be provided and this could be secured by condition. .
Water efficiency	JCS 1 & 3	Yes subject to condition. There is no known constraint on the water supply locally.
Trees	DM7	Yes subject to condition. It is noted there is some local support for the retention of the two Lawson cypress on the Avenue Road frontage and it is agreed these make a positive contribution to the street scene which is otherwise largely absent of street trees. As layout is a reserved matter, it is considered that suitable space could be designed to accommodate appropriate replacement planting that could make an equal or greater contribution long term.
Biodiversity	JCS1, DM6, Revised NPPF paragraph 175	An updated bat survey has been undertaken confirming continued bat use of the roof voids in the church and church hall. A license would be required as the loss of the bat roosts could not be avoided. A replacement bat roost feature would need to be provided in one of the new properties and other mitigation and enhancement measures could be secured by condition.
Contamination	DM11, Revised NPPF paragraphs 178-180	Yes, subject to condition. There is no history of contaminative uses on the site.

### **Equalities and diversity issues**

134. It is considered that the dwellings could be designed to be accessible and this would be considered at reserved matters stage. Should ten dwellings be proposed Policy DM12 (f) requires at least 10% to be built to Lifetimes Homes standard and this could be secured by condition. The proposal raises no other significant equalities and diversity issues.

### **Local finance considerations**

135. 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.



136. 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.
137. In this case local finance considerations are not considered to be material to the case.

## **Conclusion**

138. This outline application proposes converting the locally listed St Peters Methodist Church and demolishing all other buildings on site to provide up to ten dwellings. Access is the only detailed matter to be considered and the proposal is acceptable in this respect.
139. However, the loss of two important components of this group of buildings, consisting of the locally listed St Peters Methodist Church, the original church building latterly used as the church hall and the Boy's Brigade building, would cause harm to the significance of the Conservation Area and the degree of harm to the non-designated heritage asset of the church to be converted cannot be assessed. The harm to the designated heritage asset of the Conservation Area is considered to be less than substantial however it is not outweighed by any demonstrable public benefits of the scheme.
140. The Revised NPPF and development plan seek to sustain and enhance the significance of heritage assets and there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Whilst the local representations received do not object to the loss of the church hall or Boy's Brigade building, the proposal is considered unacceptable and contrary to the Revised NPPF and development plan.
141. The proposal also makes no provision for affordable housing either on-site or through a financial contribution and it has not been demonstrated that providing this would cause the development to be unviable.
142. The proposal is therefore contrary to development plan policies and the provisions of the Revised NPPF and there are no material considerations that indicate it should be determined otherwise.

## **Recommendation**

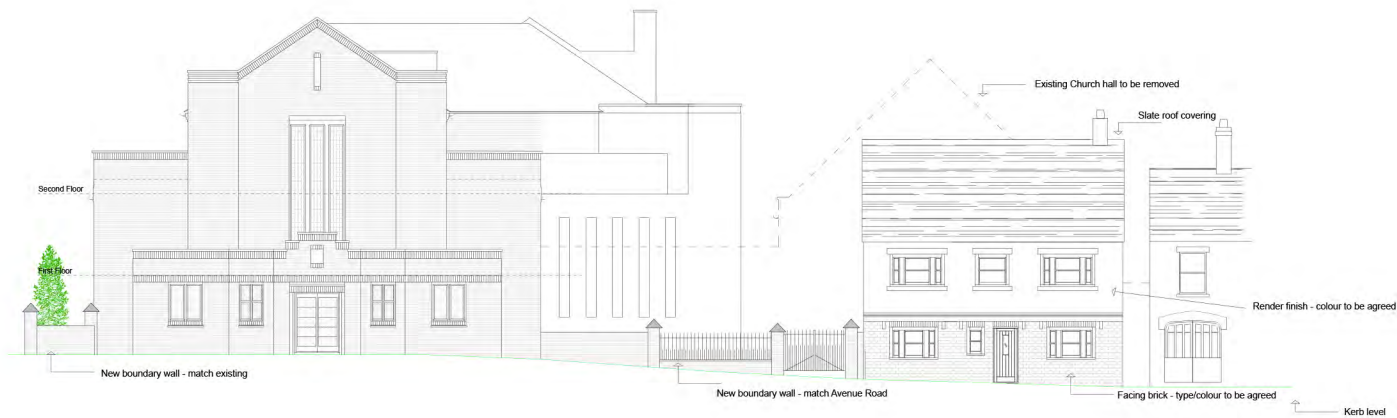
To refuse application no. 18/00504/O - St Peters Methodist Church Park Lane Norwich NR2 3EQ; for the following reasons:

1. The demolition of the church hall and Boy's Brigade building would cause less than substantial harm to the significance of the Heigham Grove Conservation Area. This harm to the significance of a designated heritage asset has not been justified nor is it demonstrably outweighed by any public benefits from the proposed development. This harm is therefore unacceptable and contrary to paragraphs 192, 193 and 196 of the Revised National Planning Policy Framework (2018) and Policy DM9 of the adopted Development Management Policies Local Plan 2014.

2. The application proposes up to ten dwellings with no provision for affordable housing either on-site or through a financial contribution and it has not been demonstrated that providing this would cause the development to be unviable. The proposal is therefore contrary to Policy JCS4 of the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk 2011, as amended 2014, Policy DM33 of the adopted Development Management Policies Local Plan 2014 and paragraph 63 of the Revised National Planning Policy Framework (2018).

### **Article 35(2) statement**

The local planning authority in making its decision has had due regard to paragraph 38 of the Revised National Planning Policy Framework as well as the development plan, national planning policy and other material considerations. The proposal in question is not considered to be acceptable for the reasons outlined above. The local planning authority has advised the applicant of alternatives which may be acceptable.



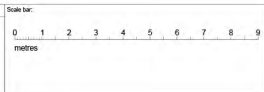
New Street Scene from Park Lane



New Street Scene from Avenue Road

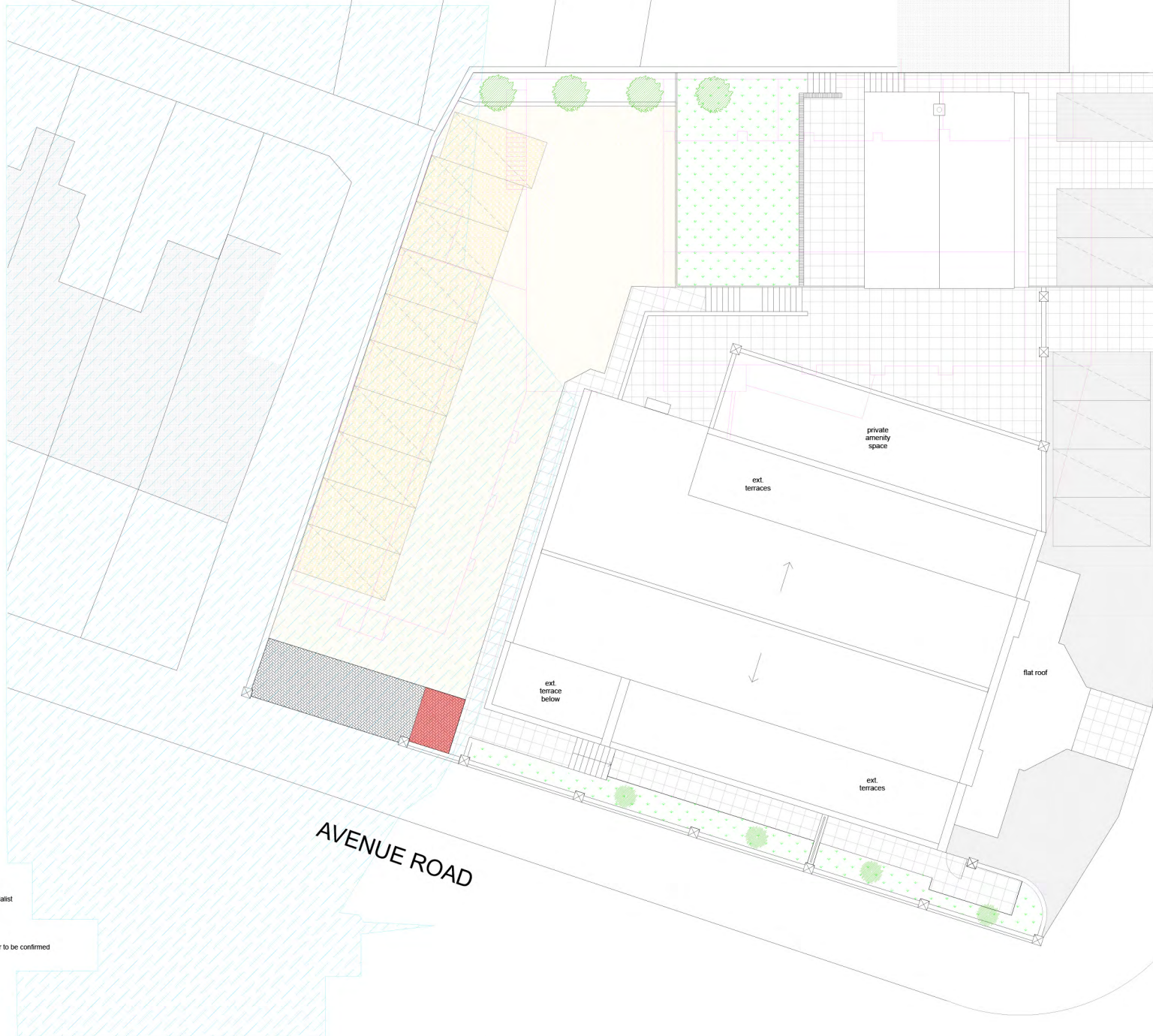
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Rev.	Date	Description
A	01 Feb	Original Issue
B	07 Apr	Change of name to existing building



Client	The Interesting Building Company Ltd.		
Project	St. Peter's, Park Lane		

Drawing Title	Proposed New Street Scene		
Scale	1:200 @ A3	Date	16.2.18
Drawn By	SJ	Revision	B
Drawing No.	8001 / 01		



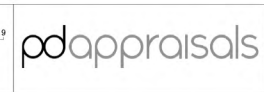
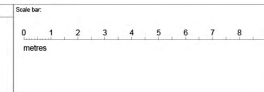
PARK LANE

AVENUE ROAD

- Existing buildings to be demolished
- Surface water
- Retaining wall
- Allocated parking space
- Boundary wall to match existing
- 120mm closed panel fencing
- Slabbed area - type/colour to be confirmed
- Denotes new tree - type to be agreed by specialist
- Presentation point for bin collection
- Marshalls Driveline Multi Block Paving - colour to be confirmed
- Tarmac finished road
- Loose gravel - type/colour to be confirmed
- Grass

**NOTES:**  
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Rev.	Date	Description
A	10 Jan	Original Issue
B	10 Apr	Amend to key - Existing buildings to be demolished



Client  
**The Interesting Building Company Ltd.**  
 Project  
**St Peter's, Park Lane**

Drawing Title			
<b>Proposed Roof Plan</b>			
Scale	1:200 @ A3	Date	10.1.18
Drawing No.	8001 / 02	Drawn By	SJ
		Revision	B