

Report to Planning applications committee
11 October 2018
Report of Head of planning services
Subject Prospect House Development Brief
Reason for referral Development brief

Item

6

Ward:	Mancroft
Case officer	Ben Webster - benwebster@norwich.gov.uk

Development proposal
Development brief providing site specific policy for the redevelopment of the site of Prospect House on Rouen Road.
Representations
See attached consultation report at appendix 2.

Main issues	Key considerations
1	Impact on the historic built environment.
2	Impact on residential amenity.
Expiry date	Not applicable
Recommendation	To approve development brief as set out in appendix 1.

The site and surroundings

1. It is a 1.03ha site in the city centre bounded by Thorn Lane, Rouen Road and the rear of properties on Golden Ball Street and Ber Street. It is currently occupied by Prospect House, the headquarters of Archant, and surface car parking associated with the business. Prospect House was built in 1969 and contains 85,000 sq ft of office floorspace. The development brief assumes that Prospect House will be demolished.

Constraints

2. The site lies within the city centre conservation area. There are no listed buildings on the site but it is adjacent to several listed buildings and within the setting of many others. These are identified in section 2 of the development brief at appendix 1. The site is near the top of the Ber Street ridge and slopes from west to east down towards the River Wensum. The policy designations that apply are explained in section 2 of the development brief.

The background

3. The site is not allocated within the Norwich Site Allocations Plan (2014) as it was not a development opportunity when the plan was produced. It is in a prominent position in the city centre, close to existing offices and the primary retail area, and its redevelopment offers significant potential for contributing to the vibrancy of the city centre and to its sub-regional role.
4. When Archant approached the city council it was agreed that the principle of redevelopment was supported and such a significant site needed to have a site specific policy to guide its development. This development brief provides that policy.
5. The brief will be a material planning consideration when decisions are made about any planning application that is subsequently submitted for the site.

Representations

6. A public consultation inviting comment on the draft Prospect House development brief was held between 29 June 2018 and 3 August 2018. The brief itself was available and its content was summarised in an exhibition held in City Hall and at Prospect House for the first two weeks of the consultation period. All the material was available on the city council's website. It can be viewed at:

https://www.norwich.gov.uk/info/20005/planning/2133/closed_consultation_prospect_house_site/1

7. The consultation was publicised through:
 - (a) A news release issued by the City Council which resulted in an article in the EDP and Evening News;
 - (b) Letters sent to businesses and residents inviting them to comment;
 - (c) Emails sent to the following stakeholder organisations inviting them to comment: Bicycle Links, Norwich Business Improvement District, Castle Mall, Norwich Cycling Campaign, Historic England, King Street Neighbours, Kings Church, Norfolk Museums Service, Norwich Society, Wensum Sports Centre.
8. The city council's design conservation and landscape manager attended the exhibition at City Hall on 5 July and 13 July 2018 and two meetings:
 - (a) Residents of Warminger Court 23 July 2018 at Warminger Court;
 - (b) King Street Neighbours 1 August 2018 at the Last Man Standing PH on King Street.
9. The comments have been compiled in the consultation report at appendix 2 with an officer response to each comment.

Changes made to the brief following consultation

10. The following changes have been made to the development brief in response to issues raised in the consultation:

- (a) The height parameters for buildings have been better explained in a “heat map” with reference to the conclusions of the building heritage assessment.
- (b) The height thresholds have been reduced:
 - (i) on the corner of Thorn Lane and Ber Street to respond to concerns about reduced daylight to residents of Warmingier Court
 - (ii) on a north south axis through the centre of the site to avoid obscuring the view of St John de Sepulchre church from the Castle
 - (iii) on the north west corner to reduce the potential for harm to the setting of the following heritage assets: Woopack PH, St John the Baptist Church and All Saints Westlegate.
- (c) Minimum dwelling and office accommodation quantities have been introduced to avoid underdevelopment of the site.
- (d) Strengthening the need to retain the Bernard Meadows sculpture on the site as a result of it becoming a listed building.
- (e) Include a requirement for charging facilities for electric cars.
- (f) Indicating that children’s play space should be provided at the centre of the site and Thorn Lane itself should not be designed as a public space in order to avoid creating a nuisance for people living in Warmingier Court.
- (g) Grey water recycling from roofs has been added as part of the options to be used to reduce surface water runoff.
- (h) Endorsement of the value (though not a requirement) of an architectural competition to improve architectural quality.
- (i) Recognition of the archaeological sensitivity of the site.

Equalities and diversity issues

- 11. There are no significant equality or diversity issues.

Conclusion

- 12. The development brief, which has been amended in response to public comment, now provides a set of development principles that will maximise the chance of a good quality redevelopment being designed for the site. It will provide a site specific policy against which a planning application can be evaluated.

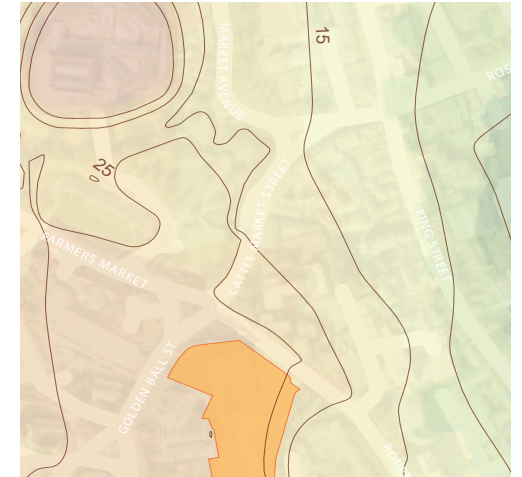
Recommendation

- 13. To approve the revised development brief featured in appendix 1.



Prospect House site development brief

Version: Final
Date: 11.10.18



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1.0 Background

1.1 Development opportunity

1.1.1 Archant own and occupy a 1.03ha site bounded by Rouen Road, Thorn Lane, Cattle Market Street and the rear of properties on Ber Street (fig.1 & 2). Prospect House is the only building on the site and it has been Archant's headquarters since it was completed in 1969. Archant announced in late 2017 that they were reviewing their property holdings at the Prospect House site. The building contains 85,000 sq ft of office floorspace. Archant have concluded that the building is too large for their needs, would require major investment if retained and fails to make the best use of the site due to the large open areas of car parking surrounding it. It is assumed that Prospect House will be demolished in any redevelopment. Historic England have confirmed that it is not good enough to be listed and a certificate of immunity from listing has been issued.

1.2 Purpose of the document

1.2.1 The site is not allocated within the Norwich Site Allocations Plan (2014) as it was not a development opportunity when the plan was produced. It is in a prominent position in the city centre, close to existing offices and the primary retail area, and its redevelopment offers significant potential for contributing to the vibrancy of the city centre and to its sub-regional role.



Figure 1 - Site location.

1.2.2 When Archant approached the City Council in late 2017 it was agreed that the principle of redevelopment was supported and such a significant site needed to have a site specific policy to guide its development. This development brief provides that policy.

1.2.3 The document will be submitted to the Council's Planning Applications Committee for approval in October 2018 following public consultation. The brief will be a material planning consideration when decisions are made about any planning application that is subsequently submitted for the site.

1.2.4 The Greater Norwich Local Plan (GNLP) is being produced by Broadland District Council, Norwich City Council and South Norfolk Council, working together with Norfolk County Council through the Greater Norwich Development Partnership. The GNLP will provide the planning strategy and identify the sites for growth across the three districts of Broadland, Norwich and South Norfolk until 2036 and once adopted will supersede the JCS. It is currently anticipated that the GNLP will be adopted in autumn 2021. Archant has made a submission to the GNLP call for sites requesting that it be considered for inclusion as a development site and developed in accordance with this brief.

1.3 Neighbouring site ownership (fig.2)

1.3.1 There are three adjoining sites owned by the council:

- 10-14 Ber Street.
Plans are currently being drawn up for this vacant site by Norwich Regeneration Ltd, the wholly-owned development company set up by the council. There is a close relationship with the Prospect House site and the co-incident of development proposals has been co-ordinated to maximise the synergy between the two sites.
- 22-24 Ber Street.
On a long leasehold to Metropolitan Properties Limited and occupied by World of Beds.
- Paradise Place
48 flats of which 27 are occupied by council tenants and 21 bought through the right to buy scheme.

1.3.2 Sites in private ownership within the wider block are:

- The Woolpack Inn, Golden Ball Street
- 4 - 8 Ber Street
- Emms Court, off Ber Street
- 16-20 Ber Street



Ownership

Norwich City Council

- 1 10-14 Ber Street
- 2 22-24 Ber Street
- 3 Paradise Place

Private Ownership

- 4 The Woolpack Inn
- 5 4-8 Ber Street
- 6 Emms Court
- 7 16-20 Ber Street

Figure 2 - Site ownerships.

2.0 Analysis

2.1 Planning policy – city centre

2.1.1 The Prospect House site is located within Norwich City Centre as defined in Norwich's local plan and the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. It is covered by a number of local plan designations being:

- within the office development priority area, city centre leisure area, city centre conservation area, and area of main archaeological interest
- just outside the primary retail area
- adjacent to an open space area and woodland.

2.1.2 It is located in a highly sustainable location in the city centre, adjacent to public transport routes.

2.1.3 JCS Policy 11 promotes an enhanced regional role for the city centre as the main focus for retail, leisure and office development, with housing and educational development reinforcing its vibrancy. Redevelopment of brownfield (previously developed) sites will contribute to the economic, social, physical and cultural regeneration of the city centre. The JCS also promotes expansion of the city centre's function as an employment centre, including provision of high quality office premises and a diversity of employment uses across the area. JCS 11 also highlights the importance of improvements to the public realm, open spaces, walking and cycling provision and sustainable transport access.

2.1.4 The JCS key diagram (fig.3) shows that the

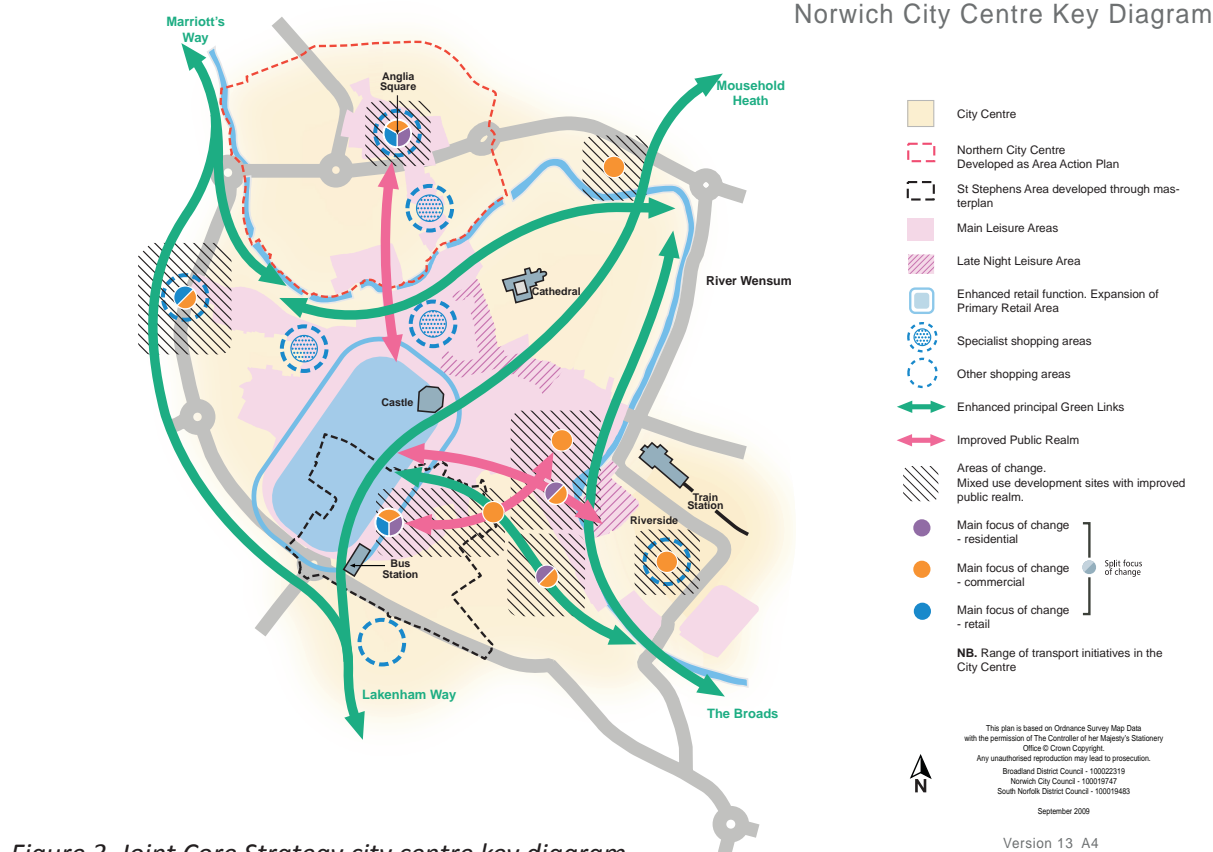


Figure 3 Joint Core Strategy city centre key diagram

Archant site lies between two key areas of change – the Rose Lane / Mountergate area, which is identified as a major focus of commercial development, and the St Stephen's Street area which is promoted for retailing, offices and housing.

2.1.5 Norwich Site Allocations Plan was adopted in December 2014 and makes two allocations in the vicinity of the Archant site including:

- 10-14 Ber Street (CC3) – proposed for a mix of

uses including retail or complementary uses at ground floor level; residential on upper floors (min 10 dwellings) – 0.1ha;

- Land at Garden Street (CC10) - mixed use redevelopment with in the region of 100 dwellings, an element of office / business uses, and replacement car parking – 1.08 ha in total;

2.2 Planning policy - offices

- 2.2.1 Redevelopment of the Archant site will involve the loss of existing office space on the site. The site is not designated as an employment site, but does fall within the Office Development Priority Area defined by policy DM19.
- 2.2.2 Policy DM19 implements the strategic priorities of the Joint Core Strategy (Policies 9 and 11) in identifying land to deliver a net increase at least 100,000 sq.m of new office floorspace in the city centre to 2026 and to secure provision of high quality office premises. It seeks to protect high quality office space and encourage the upgrading of poor quality and smaller offices. The JCS growth strategy (which is the basis for DM19) is predicated upon levels of growth which are unlikely to be achieved. The GNLP Growth Options Document states that office provision in the city centre has fallen by 8% since the start of the JCS planning period in 2008.
- 2.2.3 An Employment, Town Centre and Retail Study was commissioned by the Greater Norwich authorities (Norwich City Council, Norfolk County Council, South Norfolk Council and Broadland District Council) in 2017 to provide evidence for the emerging GNLP (GVA, November 2017). This study identifies a more positive picture for potential future of office based employment in the city centre. The enhanced growth forecast shows an estimated additional demand to 2036 for Greater Norwich as a whole to around 170,000 sqm of B1a (office) / b (R&D) floorspace. The GNLP states that a large proportion of this should be allocated in the city centre to help sectors based in

the centre to grow, to realise sustainability benefits, and achieve the economic benefits of agglomeration.

- 2.2.4 The study's Strategy Advice report identifies the Norwich urban area's role as the principal focus and driver of the Greater Norwich economy, and a magnet for people from the wider area to work, shop and visit. Norwich city centre's employment offer is changing and the study identifies an increasing 're-urbanisation' of business activity (driven by wider business trends and small business creation within the creative and media sector in particular) back to locations which offer a broader range of services to employees, such as the city centre. The GVA evidence suggest that there is now growing demand for high quality and flexible office space in the city centre in attractive and accessible locations, with the main city centre growth sectors identified as digital, cultural and creative industries and financial services.
- 2.2.5 Prospect House was constructed in the 1960s so the office accommodation is dated. As such the loss of this office space would not be protected by DM19. However the policy does require that any redevelopment of this site will be expected to include an element of office floorspace. Provision of new offices as part of the development of the site, replacing the existing lower grade accommodation with purpose built, flexible and attractive high quality office space as part a mix of uses, would meet the requirements of DM19 and help to support the vitality and viability of this part of the city centre.

- 2.2.6 The provision and retention of high quality office accommodation is a crucial element of the city council's development strategy for Norwich. The Archant site is an established location for office use in the Office Development Priority Area and is situated in a key interface between the South City Centre area and the St Stephen's Street area / primary retail area. Retention of a significant part of the site for office use would contribute to a substantial office base in the city centre which is considered critical to maintaining the long term viability and vitality of the city as a retail and visitor destination and a major employment hub. Ideally this provision should be in a prominent location such as the Golden Ball Street frontage or the junction of Ber Street and Thorn Lane.
- 2.2.7 Archant is a major employer in the city centre. The civic importance of Archant and its predecessor businesses as the gatherers and distributors of news about the city has always been reflected in its occupancy of visible and proud building in the city centre. The council strongly wishes to see Archant remain on the site in new office accommodation although planning legislation does not enable the council to restrict the occupancy of office space to a particular occupier.

2.3 Planning policy - Housing

2.3.1 JCS policy 4 reflects evidence on housing needs and seeks that 1,833 homes will be provided each year within the Norwich Policy Area (NPA) between 2008 and 2026, of which at least 8,500 are to be provided in the City Council's administrative area. Since adoption of the JCS market conditions have meant that the rate of building has been below that necessary to achieve the levels set in the JCS both within the City Council area and across the wider NPA, notwithstanding a very large stock of unimplemented planning consents.

2.3.2 The level of housing need in the emerging GNLP is based on the latest housing needs assessment - the Strategic Housing Market Assessment (SHMAA) for Central Norfolk, which was published in July 2017. The Regulation 18 plan identifies Norwich as having the capacity for an additional 1,500 homes to 2036 that are not already allocated in planning documents. There is potential to increase this figure further and the Archant site represents an opportunity to deliver much-needed additional housing in a sustainable location.

2.3.3 The SHMAA also looks at property size and tenure issues. Of the predicted need for market housing arising from the City, approximately 36% of the needs will be for 1 and 2 bedroomed properties. 38% of all housing need in the City is generated by households who are not able, or predicted to be able, to meet their own needs in the housing market (either by private rented or owner occupied housing) and therefore are in need of affordable housing. Of these

households, 68% will have a need for 1 and 2 bedroomed properties.

2.3.4 JCS policy 4 requires that 33% of all housing on larger development sites is delivered in the form of affordable housing. The policy further states on sites for 16 dwellings or more the tenure split for the affordable housing should be 85% social rented and 15% of intermediate tenures. The SHMA 2017 shows the annual need by property type and tenure as:-

Norwich	Property Type	Market Housing	Affordable Rented Housing	Low Cost Home Ownership	Total
Flat	1 bedroom	50	90	9	149
	2+ bedroom	55	47	10	112
House	2 bedroom	54	25	6	85
	3 bedroom	231	53	17	301
	4+ bedroom	56	17	3	76
Total		446	232	46	724

2.3.5 Whilst the SHMA shows a high need for 2-bedroom flats and 3-bedroom houses for affordable housing, in reality we have a surplus of these since the spare room subsidy was introduced and therefore the council is currently seeking an affordable housing provision comprising 1-bedroom flats, 2-bedroom houses or larger 4+ bedroom houses. This site lends itself to higher density flatted development due to its location and topography however some housing on the site would be welcome.

2.3.6 Providing affordable housing in separate blocks would allow for easier disposal, management and maintenance and allows any registered provider or the council to keep service charges

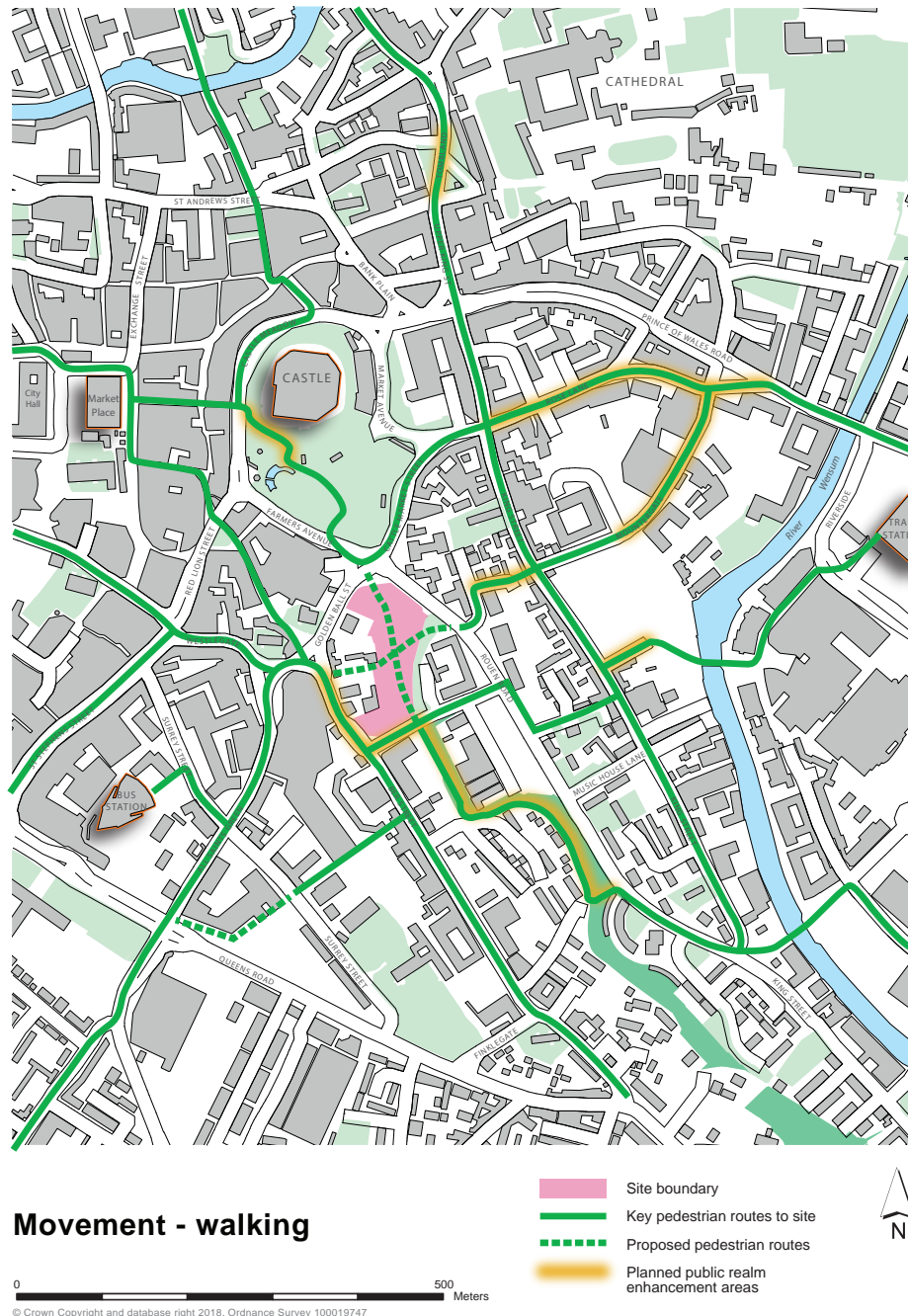
to a minimum. However, it is important that there is no visible distinction in quality of location, outlook or design that would identify those blocks as affordable housing or give residents an inferior quality of accommodation.

2.3.7 Current planning practice guidance 2014, para 21, states that local planning authorities should plan for sufficient student accommodation, whether communal or self-contained buildings, and on or off-campus. Policy DM13 sets out criteria to guide residential institutions and student accommodation, whilst DM12 sets out principles for all residential development.

2.3.8 The council is currently experiencing a significant increase in the number of planning applications and requests for pre-application advice for purpose-built student accommodation. There are approximately 2,520 units of student accommodation currently either under construction, with planning consent, or pending a planning decision, and a further approximately 980 units proposed through the pre-application process or understood to be coming forward, giving a total of around 3,500.

2.3.9 The council has commenced a study to investigate the need for new student housing in Norwich to inform consideration of planning applications and potential future planning policy. Evidence gathered to date suggests that although there is a significant gap between the current provision of student bed spaces in the city (in the region of 5,000) and the total number of students (around 17,500 full-time students at the University of East Anglia and Norwich University of the Arts). Further investigation

Figure 4



is required into the universities' anticipated growth and trends such as growth in international students, and likely demand for living in purpose built accommodation beyond the first year.

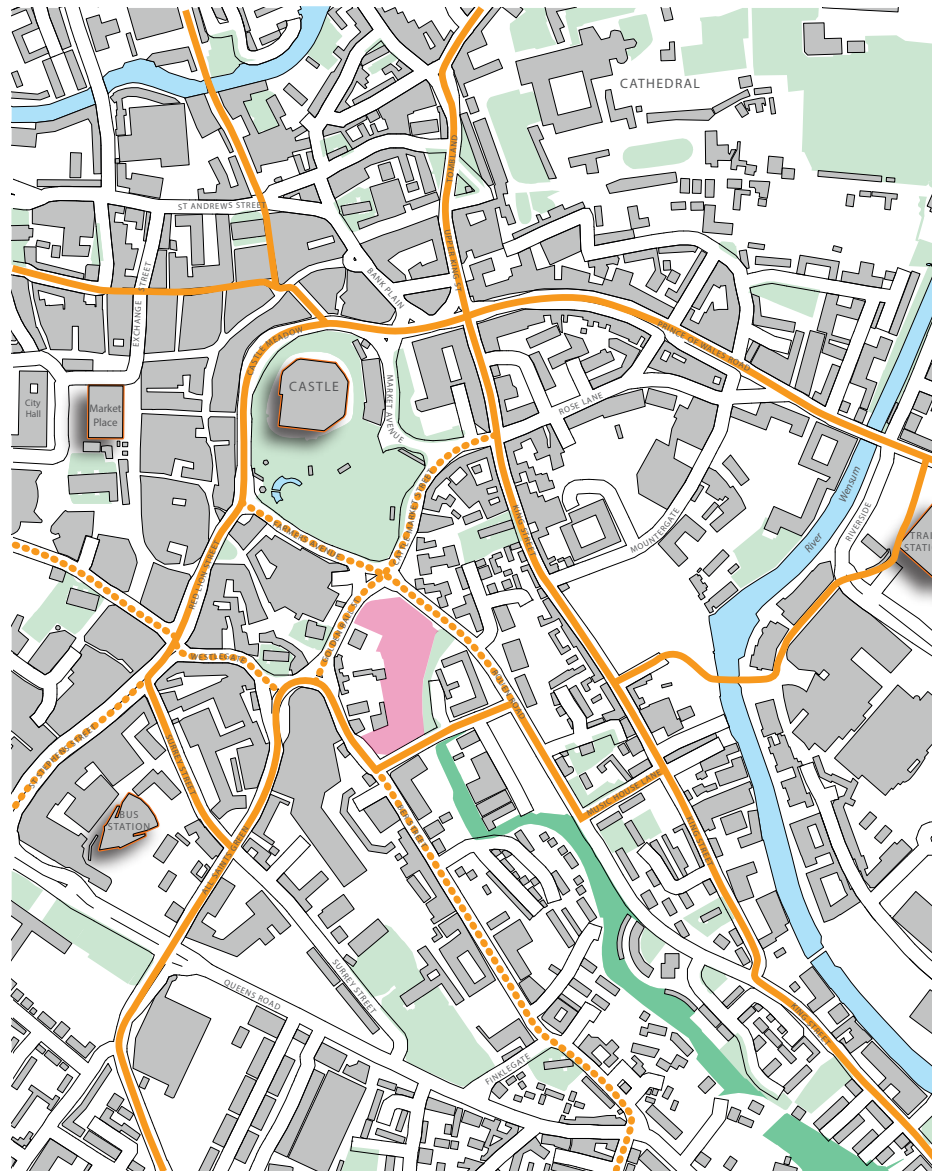
2.3.10 The Prospect House site is suitable in principle for student housing provision, being in a city centre location with sustainable transport links. However, in light of the emerging evidence referred to above, the council would prefer to see the provision of general market housing and an element of affordable housing in line with JCS policy 4. This would make a significant contribution to meeting objectively assessed need for market and affordable housing in the city centre.

2.4 Planning policy – retail

2.4.1 The Greater Norwich Employment, Town Centre and Retail Study Strategy Advice (2017), produced as evidence for the GNLP, states that the GNLP will need to positively plan for the development of additional comparison (non-food) floorspace over the course of the plan period. It identifies a requirement for 11,100-15,000 sqm of additional comparison retailing provision in the Norwich urban area to 2027.

2.4.2 The evidence study notes that comparison goods shopping is the reason that the vast majority of people visit the city centre, and that the city centre is a top 15 ranked shopping destination nationally. It recommends that the majority of the identified comparison goods requirement for the Norwich urban area is accommodated in the city centre. It goes on to state that the council should ensure new comparison retailing is well-related to the existing shopping circuit in the city centre.

Figure 5



Movement - cycling

- Site boundary
- Pedalway (existing or proposed)
- Site access non-pedalway connections



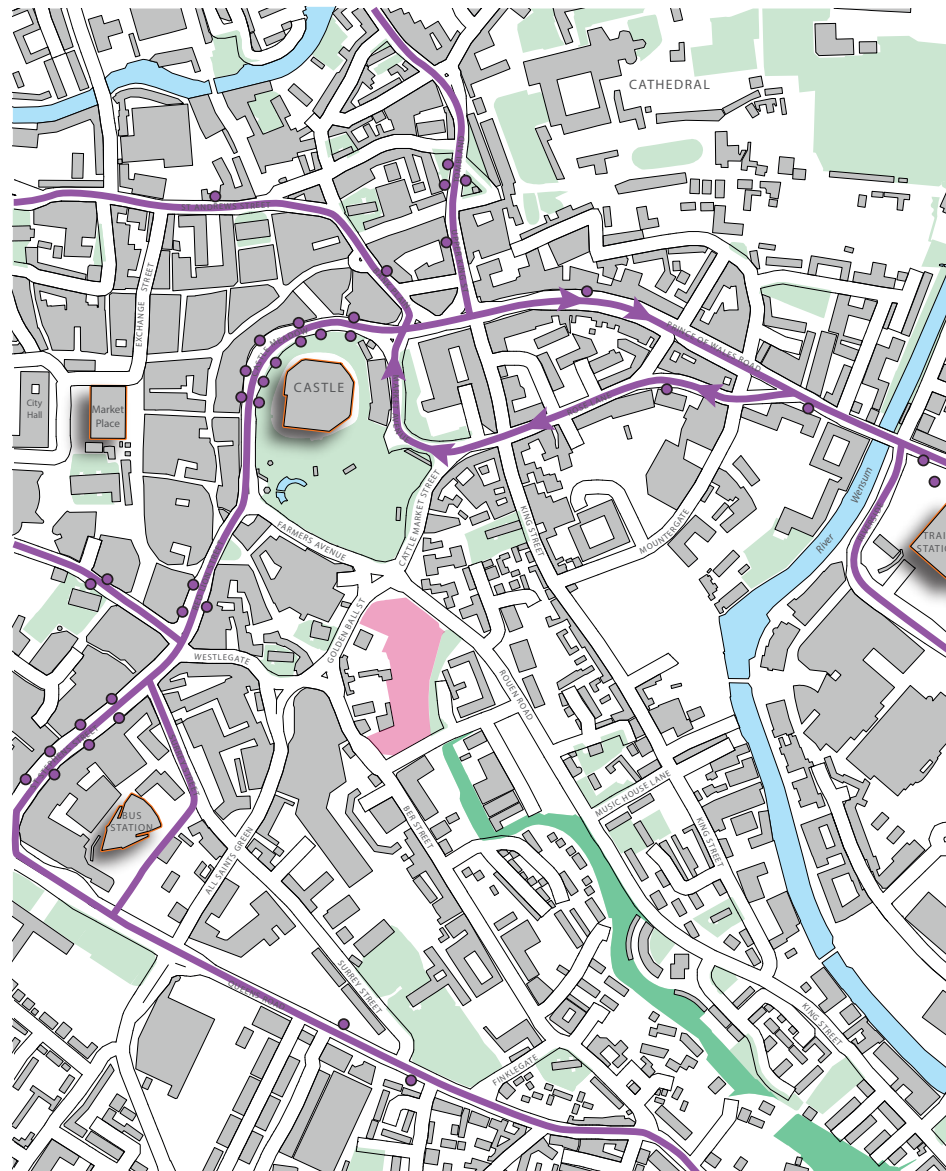
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2.4.3 The site is outside but directly adjacent to the primary retail area. Given this closeness to the main retail centre, the site has the potential to contribute to the strength of the city centre by including retail as part of the mix of uses. Any retail development must be well related and well connected to the existing primary retail area, particularly to nearby shopping provision at John Lewis, Westlegate and Timber Hill. The recent changes to traffic circulation in the Westlegate area and associated public realm improvements, have helped reinforce links between the Ber Street / Golden Ball Street area and the Stephen's Street area / primary retail area. The ground floor on Ber Street would be an appropriate location for additional retail. Given the site's location within the city centre leisure area, leisure and hospitality uses would also be appropriate in principle as part of a mix of uses, subject to the policy considerations set out in DM18.

2.5 Movement and parking

- 2.5.1 This site has better access to sustainable transport and public car parks than any other development site in Norfolk.
- 2.5.2 Policy DM28 of the adopted Development Management Policies Plan (DMPP) encourages sustainable travel, including cycle and pedestrian links, and maximising accessibility to and permeability of development sites for pedestrians.
- 2.5.3 The local walking network is shown in figure 4. It shows that the most direct route from the train station to the bus station and the St Stephens part of the city centre is via the Lady Julian Bridge, Thorn Lane and Westlegate. Thorn Lane is very steep and as a respite from the arduous climb the Prospect House site offers the opportunity to connect to Ber Street on an easier gradient

Figure 6



Movement - buses

- Site boundary
- Bus routes
- Bus stops

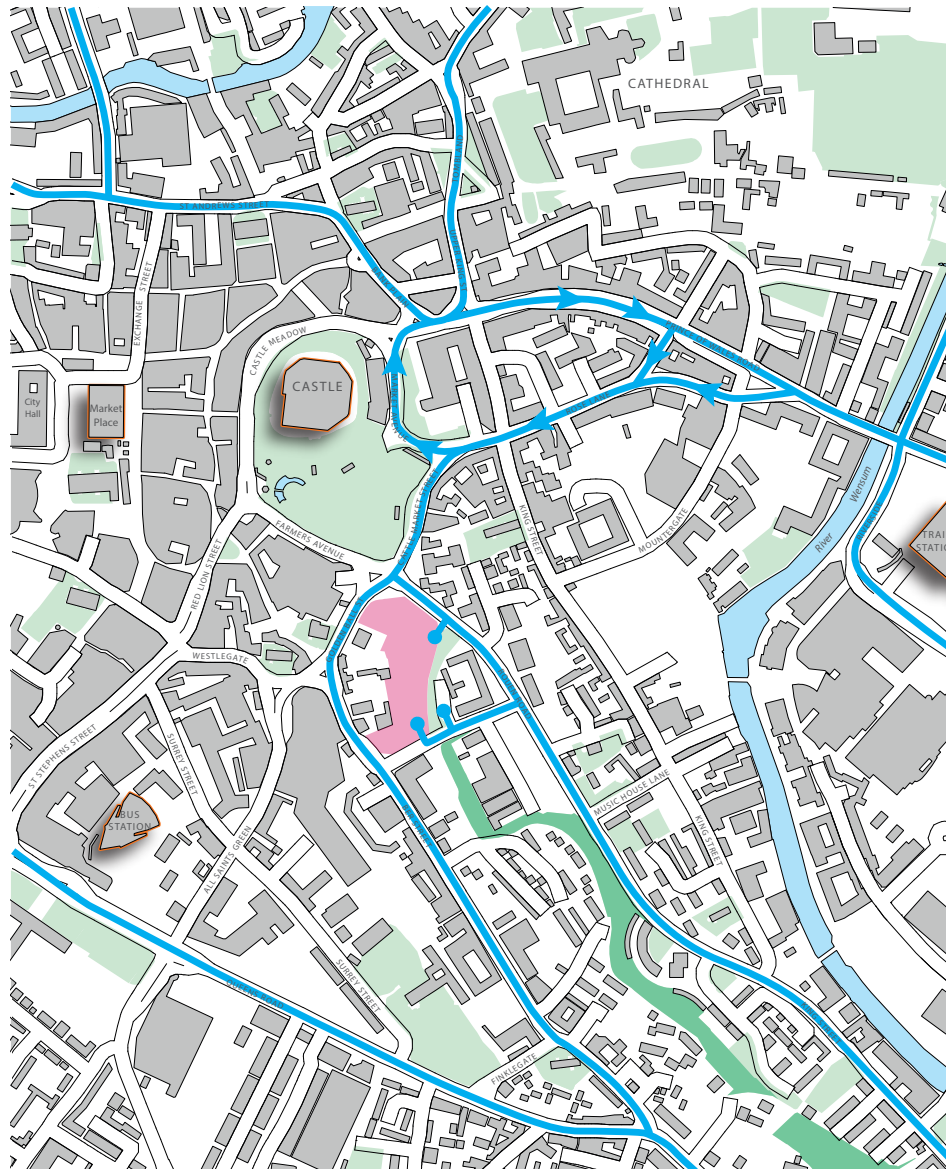


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via new public spaces on the site and to 10-14 Ber Street. A north-south connection from the lower part of King Street and the Carrow Works site to Castle Gardens and the market place on the alignment of the wooded ridge can also be provided through the site.

- 2.5.4 The local cycling network is shown in figure 5. The orange pedalway passes the site on Thorn Lane en route between the train station and Brazengate via Thorn Lane. The main challenge of this section of the pedalway is the gradient on Thorn Lane. National cycle route 1 passes close to the site along King Street.
- 2.5.5 Bus routes and bus stops are shown in figure 6. The site is a short walk along Westlegate, All Saints Green and Farmers Avenue to the highest concentration of bus services in Norfolk.
- 2.5.6 General traffic is shown in figure 7. It passes the west edge of the site along Ber Street and Golden Ball Street and the east edge of the site along Rouen Road. Thorn Lane is closed to traffic at its west end. The location of vehicular access to the site should ensure that vehicular movements do not undermine the creation of a safe and attractive environment and minimise impacts on the surrounding road network. The most appropriate solution is likely to focus vehicular access on the north eastern edge of the site, with access taken from Rouen Road. Any secondary access from Thorn Lane must be compatible with an enhanced pedestrian connection across Thorn Lane on the alignment of the wooded ridge.
- 2.5.7 The level of parking on this site should be minimised given its highly sustainable location and car-free housing would be strongly encouraged. Although the maximum level of parking for any housing element (set out in Appendix 3 of the DMPP) is 1 space per household, it would be expected that the level would be substantially lower

Figure 7



Movement - general traffic

- Site boundary
- General traffic routes
- Potential traffic access to site
- One-way traffic



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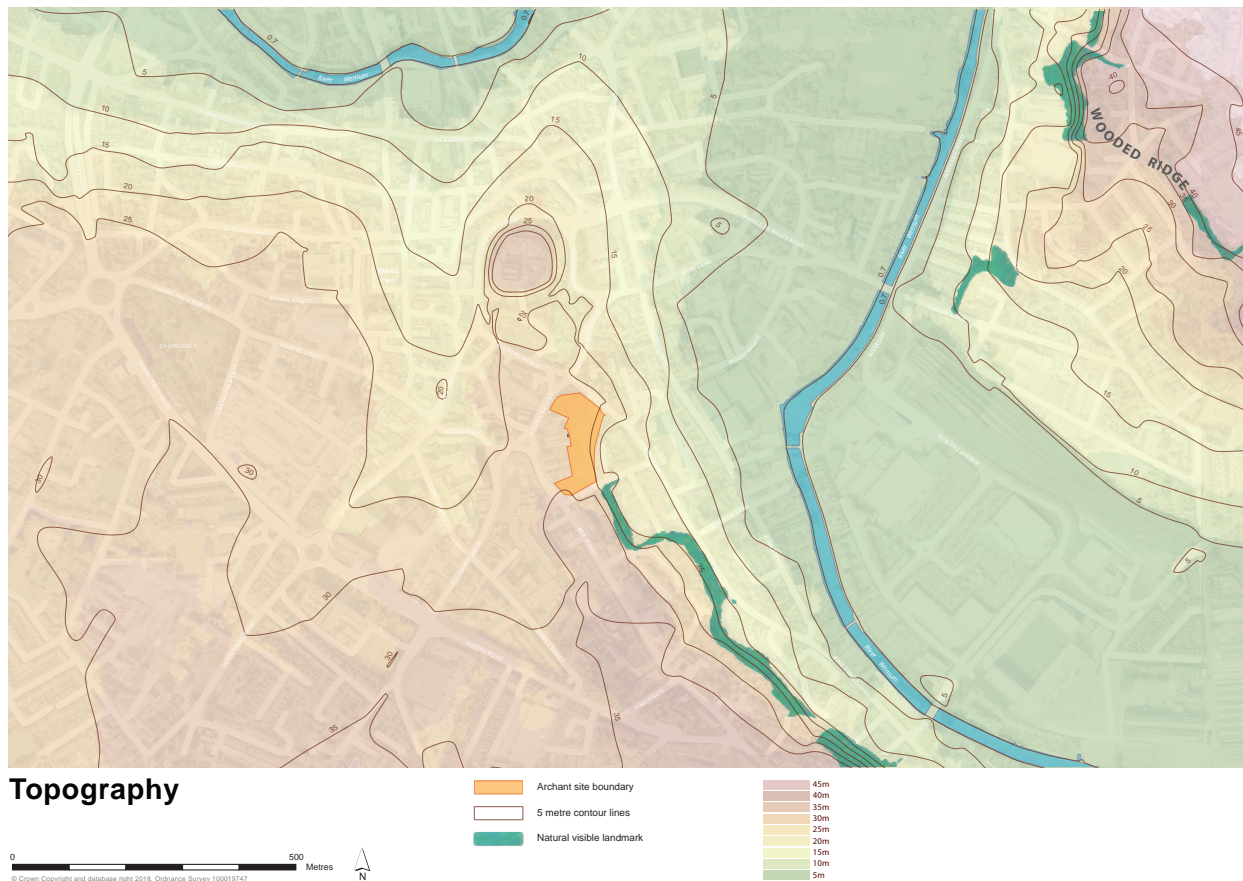
than this. Parking for employment uses are specified in Appendix 3. No parking would be allocated for retail uses. Provision of a car club parking space and car club vehicle will be expected for a development of over 100 units. If car parking is provided on the site it would be preferable for it to be contained beneath the buildings at the northern end of the site.

2.5.8 The air quality baseline review that was completed in March 2018 indicated that the operation of the development as a result of changes in traffic emissions as well as any centralised combustion plant has the potential to impact on the city centre air quality management area as well as nearby residents (e.g. Paradise Place and at the rear of Ber Street). These impacts will need to be quantified as part of an application process and mitigated. Mitigation measures could include:

- Limitations on car parking, provision of cycle parking, electric vehicle charging, pedestrian routes
- Planting
- Energy and thermally efficient housing
- Commercial servicing strategy
- Travel plan
- Optimal flue height for any combustion plant.
- Location of ventilation extracts for any covered parking to avoid emissions affecting existing or new residents.

The report concluded that if suitable mitigation is provided air pollutant concentrations are not a constraint to development at the site.

Figure 8



2.6 Topography, green Infrastructure and views

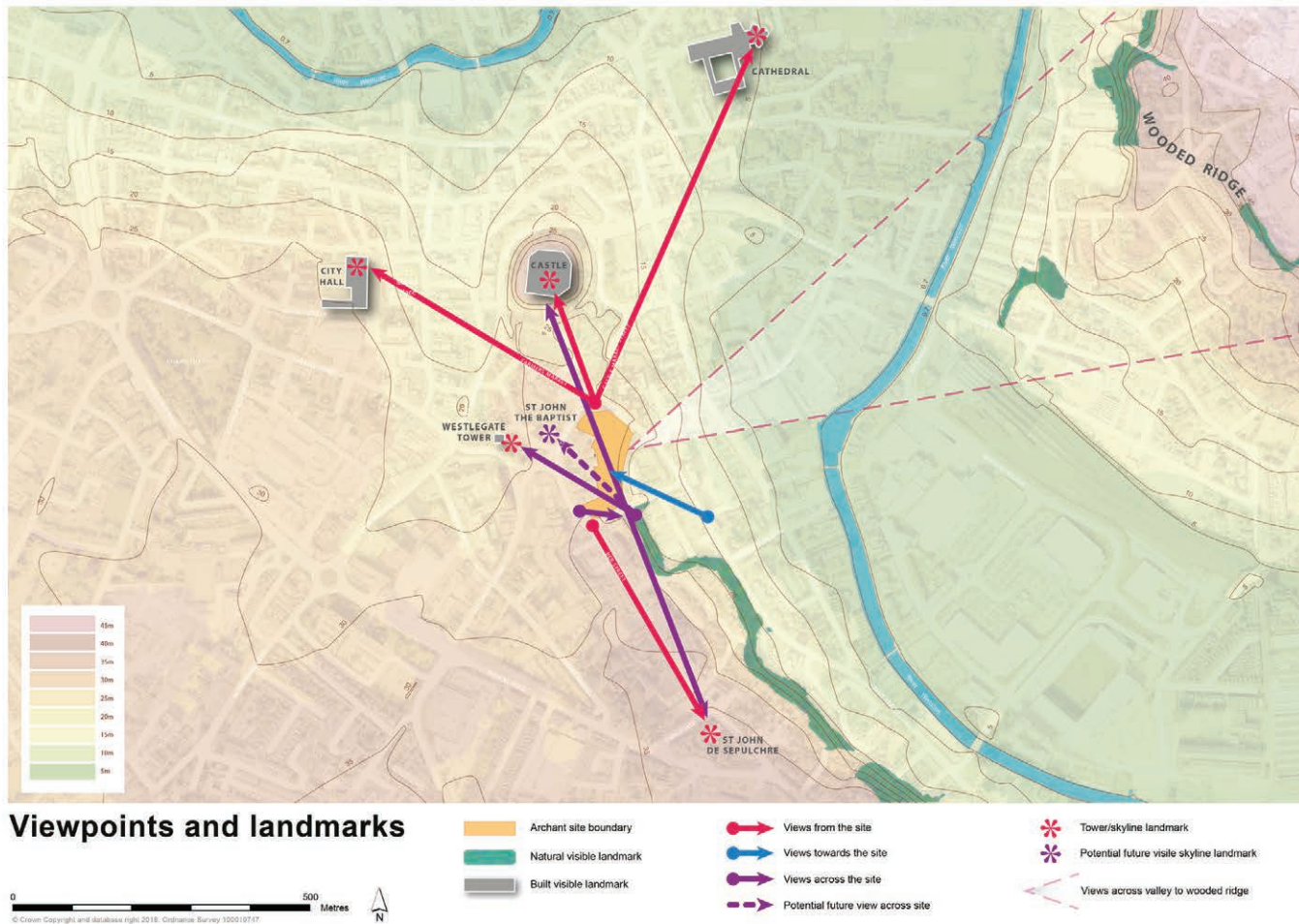
2.6.1 The city centre key diagram (Fig. 3) highlights principal green links that the JCS seeks to enhance. One of these is the wooded ridge within the study area. The wooded ridges of the city are valued green areas lying to the top of the Wensum and Yare river valleys on steeply sloping ground between 10-25 metres elevation. Much of the wooded ridges within the city are still in existence although some areas have become fragmented as a result of development over time. Norwich City Council’s Development Management Policies Local Plan (2014) objective 9 and policies DM3, DM6 and DM8 concern green infrastructure and are applicable to the study area.

2.6.2 The Norwich Site Allocations and Site Specific Policies Local Plan (2014) includes policy CC10 relating to land at Garden Street near Prospect House. The policy requires protection and enhancement of the wooded ridge, enhanced landscaping, green infrastructure and improved pedestrian and cycle links through the site.

2.6.3 At 20-25 metres elevation, Prospect House sits near the top of the valley side with land sloping steeply away to the east towards the river Wensum; the plateau lies to the south-west at 30 metres. (fig.8)

2.6.4 The dominant topographical feature within the study area is the ridge line extending north–south at 20-25 metres elevation. The ridge widens out as it moves through the Prospect House site and rises to a 25 metre elevation at the junction of Rouen Road, Cattle Market Street and Golden Ball Street. Figure 9 clearly illustrates why the Castle was strategically positioned at the end of the ridge overlooking the river below. This ridge line is generally wooded and undeveloped because the slopes are steep. Instead, development is found above on the plateau

Figure 9



and terraced below the ridge where slopes are gentler and building conditions more favourable.

2.6.5 The majority of the development site is relatively level and in effect is set on a terrace between Paradise Place and mixed development on Ber Street. The only exception is the on-site car park adjacent to Thorn Lane which extends westwards up a slope to match levels on Ber Street.

2.6.6 This terracing leaves some areas of banked grassland, some with tree planting, which have limited functional use. These banks are located between Ber Street and lower car park levels, and between the main site and Paradise Place.

2.6.7 There are a number of local ground level vantage points for views to and from the site to other local landmarks. Figure 9 show the locations of these landmarks and lines of sight across the city.

- Norwich Castle
- Norwich Cathedral
- City Hall clock tower
- Westlegate Tower
- St John de Sepulchre

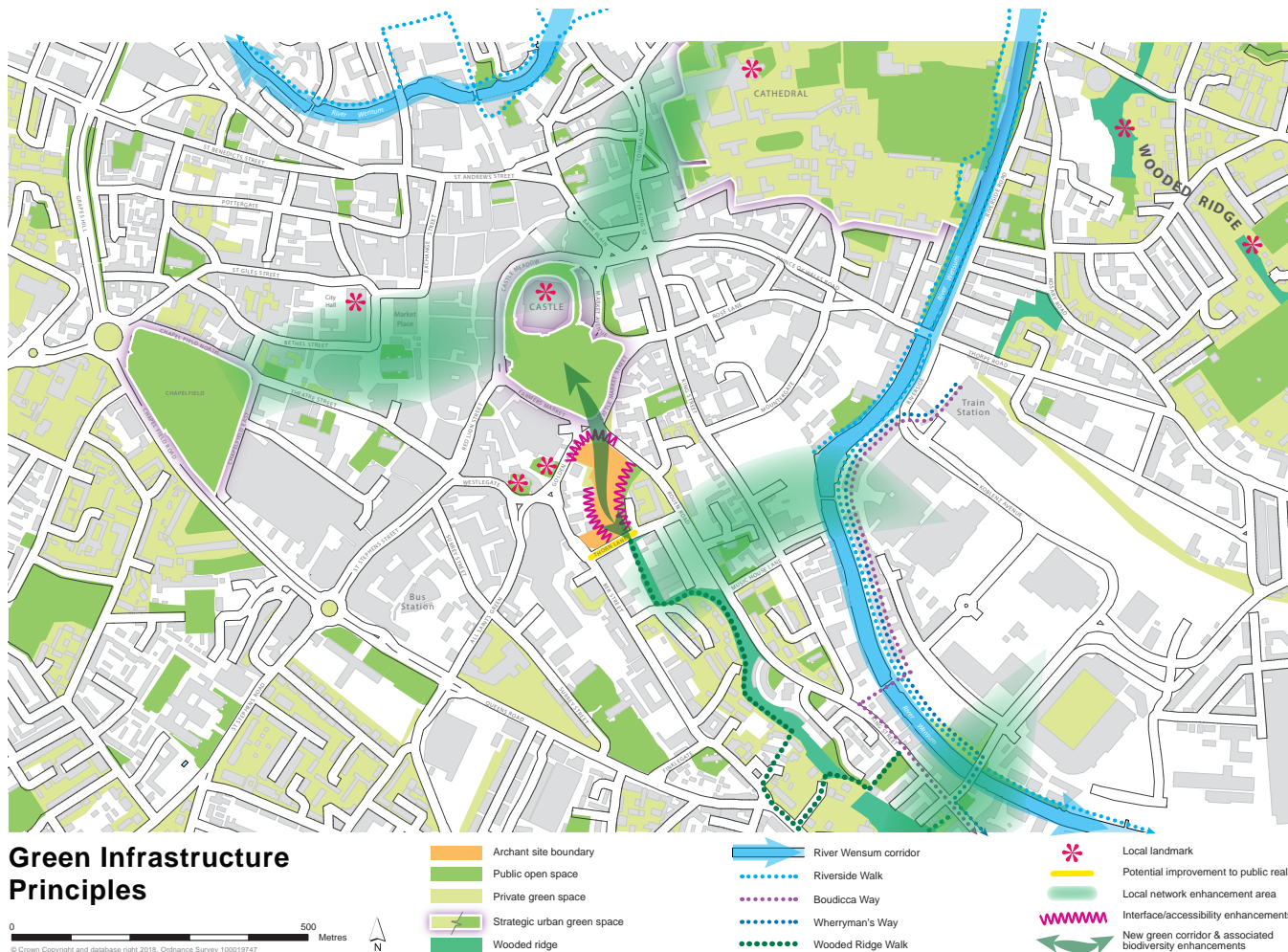


Figure 10

2.6.8 The view from the corner of Golden Ball and Cattle Market Street at the northern part of the site is particularly impressive where Norwich Cathedral and Castle can be seen.

2.6.9 The main entrance of Prospect House to the northern extent of the site is the location of a large piece of sculpture by Bernard Meadows, which was recently given protected listed status. Although views to this artwork are currently restricted by level changes and trees, this is a feature which contributes to the heritage of the site and must be retained; there is a clear opportunity to create an improved public realm and integrate the sculpture as a distinctive landmark (fig.11).

2.6.10 Figure 10 shows Prospect House within the wider green infrastructure context. It includes both public and private green space at a relatively large scale, and is derived from Joint Core Strategy baseline information as well as an assessment of aerial imagery. It also shows the sister corridor to the opposite ridge comprised Mousehold Heath and the Thorpe wooded ridge, components of which can be seen from some parts of the site.

2.6.11 Although Prospect House lies on the wooded ridge corridor, the building interrupts the flow and consistency of the tree-covered ridge. The Castle Gardens lie to the north of the site and are a significant area of greenspace within the city centre. There is opportunity to improve the connectivity between the wooded ridge and Castle Gardens to enhance this green infrastructure corridor.

2.6.12 Development at this site should seek to improve connectivity between the city's strategic green infrastructure components including the Wooded Ridge, Castle Gardens and Green, Chapelfield Gardens, Norwich Cathedral / The Great Hospital and the River Wensum. Measures should enhance biodiversity and network connectivity through a combination of interventions at different levels including:

- street tree planting,
- public open space,
- Sustainable Urban Drainage (SUDS),
- green roofs / walls
- Integral bird / bat boxes and
- private green space.

2.6.13 Any enhancements made to the green infrastructure network should be for wildlife and public benefit. Links between the Wooded Ridge Walk, the Wensum Riverside Walk, Norfolk Trails and Yare Valley Walks should be considered alongside biodiversity enhancement measures.



Figure 11 - Bernard Meadows sculpture (1970)

2.6.14 Any potential redevelopment should take into account and exploit existing views to landmarks and visible skylines from site vantage points. The sister wooded ridge to the other side of the Wensum Valley is of particular note, as well as views to local landmarks such as Norwich Castle, Norwich Cathedral, City Hall, St John de Sepulchre, and Westlegate Tower.

2.6.15 Given that the site is over 1ha in size and is likely to have the capacity for over 100 homes, its redevelopment is likely to trigger the requirement in policy DM8 for on-site provision of informal publicly accessible recreational open space and younger children's playspace. This should be an integral part of the design of the development and ideally overlooked by homes.

2.6.16 New public spaces should be created within and on the edge of the development site that relate well to the pedestrian routes identified in the previous section and are framed by buildings within the site and the adjacent 10-14 Ber Street site:

- Adjacent to the upper section of Thorn Lane. The recent closure to through traffic makes this possible. It will welcome people into the development who are walking up Thorn Lane or crossing from the wooded ridge walk.
- In the centre of the site at the intersection of a new east-west route from Ber Street to Rouen Road and the new north-south route from Thorn Lane to Castle Gardens / Farmers Avenue.
- Connected spaces at the north end of the site that provide a protected residential courtyard and an elevated terrace on the Golden Ball Street frontage with views to the Castle and Cathedral.






Figure 12

2.7 Trees and ecology

2.7.1 The trees on the site have been surveyed and a constraints plan produced (fig.12) with an accompanying schedule identifying the species, size, age, physiology and structure. It also ascribes an importance to the trees which is an important factor in determining whether they are an asset to the site and should be protected in redevelopment proposals. The trees on the Golden Ball Street frontage, on the wooded bank adjacent to Paradise Place and on the side of Rouen Road are recommended to be retained. The three London Plane trees (one off site and two within the raised terrace area) are particularly good specimens. There should be extensive planting of new trees within the public spaces on the site, to provide an attractive environment for residents and encourage people to walk through, and to connect the wooded ridge between Thorn Lane and Castle Gardens. This is especially important if loss of existing trees on the site needs to be mitigated. The council's supplementary planning document for Landscape and Trees provides detailed guidance.

2.7.2 The ecology survey has concluded that the site is of low nature conservation importance. No statutorily protected species were identified although three bird species that are 'red-listed' by the RSPB for their declining populations were found: linnets, house sparrows and herring gulls. No habitat would be lost through the redevelopment of the site. Opportunities exist to boost biodiversity through retention of mature trees, planting new trees and other vegetation and installation of boxes for birds, bats, hedgehogs and insects.

-  Category A: Trees of high quality and value
-  Category B: Trees of moderate quality and value
-  Category C: Trees of low quality and value

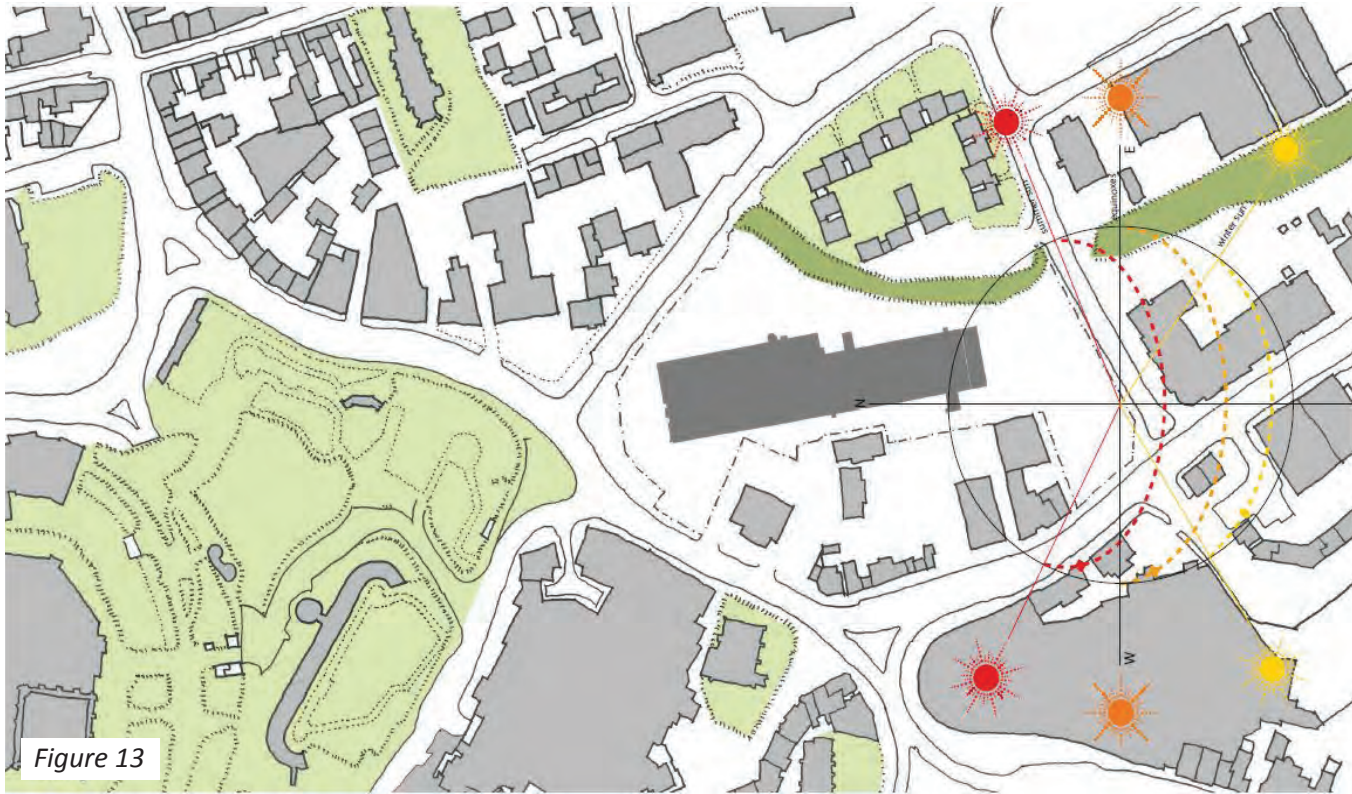


Figure 13

2.8 Flood risk and drainage

2.8.1 A Flood Risk and Drainage Briefing note (April 2018) has been produced and it finds that:

2.8.2 The risk of surface water flooding to the development is low. External ground levels should have a nominal fall away from any entrances to buildings, with ground levels maintained above the adjacent highway.

2.8.3 Foul and surface water runoff should connect into Anglian Water's sewer network, due to the presence of contamination on the site and the lack of an adjacent watercourse. It should

discharge via gravity with pumping being avoided.

2.8.4 A reduction in the current rate of discharge of surface water of 50% is essential, requiring 305m³ of retention. An increase to greenfield rate may be required, which would entail 531m³ of attenuation.

2.8.5 Attenuation should be provided through a variety of sustainable urban drainage techniques including, but not limited to, ponds, blue roofs, swales, bio-retention areas, green roofs and permeable paving.

2.8.6 Thorn Lane is identified on the Environmental Agency's mapping as being at risk of surface water flooding. It is important that any proposed accesses into the site do not create new flow routes from Thorn Lane into the development, with ground levels sloping up from the highway.

2.9 Energy

2.9.1 The requirements of JCS policy 3 should be met. These include a requirement to include sources of decentralised and renewable or low-carbon energy providing at least 10% of the scheme's expected energy requirements and to demonstrate through a design and access statement whether there is scope to exceed this. The site has good exposure to sunlight so mounting photovoltaics on roofs could be part of the approach. (See sun path diagram fig 13)

2.10 Ground conditions

2.10.1 A ground conditions strategy for the site was produced in April 2018 following a desk top study in October 2017.

2.10.2 Potential sources of ground contamination include above and below ground fuel tanks, former operational areas of the former print works, a transformer and made ground. Investigation of these features is required prior to redevelopment and should include assessment of the risk to groundwater and the ground gas and vapour regime.

2.10.3 Based on the information presented in the desk study, significant widespread contamination at the Site is unlikely. However, localised soil and groundwater contamination around potentially contaminative features is possible. Ground investigation would help to establish the nature and extent of existing contamination and feasible options for its remediation.

2.10.4 Materials balances should be investigated at an early stage to identify opportunities for materials re-use on-Site or suitable permitted sites for disposal. The potential for some soils classified as hazardous for waste disposal purposes cannot be discounted, particularly close to the fuel tanks. However, re-grading the site presents an opportunity for re-use of soils as part of cut and fill operations providing they are chemically and geotechnically suitable. The CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP) can be used to facilitate material re-use subject to appropriate sampling and testing, risk assessment and compliance with the requirements of the DoWCoP.

2.10.5 Historically, the Site has undergone several phases of redevelopment. Therefore, consideration should be given to the potential presence of buried obstructions and constraints they present to foundation design.

2.10.6 The Site is indicated to be in Source Protection Zone 2 – outer catchment. Restrictions can be placed on potentially contaminative development and activities in SPZs. However, considering development does not include potentially significant contaminative activities,

it is likely restrictions will be limited to a planning condition requiring a foundation works risk assessment to assess potential risks to groundwater from the preferred foundation solution.

2.10.7 Ground investigation and remediation would be undertaken as part of redevelopment, which follows the approach in the Council's Contaminated Land Strategy. This approach could be secured by inclusion of contaminated land planning conditions.

2.10.8 Upon completion of the Development and implementation of appropriate remediation measures, the site would be expected to meet the requirements of NPPF that as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

2.11 Design and historic built environment

2.11.1 A built heritage assessment has been produced to inform this brief.

2.11.2 The site lies within the city walls. In the past there have been a number of churches in or close to the site. St Michael at Thorn, after which Thorn Lane was named, was built in the late eleventh or early twelfth century. It stood in the south east corner of the site at the junction of Thorn Lane and Ber Street. It was demolished in the late 1940s after suffering bomb damage. St Martin in Balliva church lay within the northern edge of the proposed development site and associated archaeological remains may extend

into the red line area." Surviving churches in the vicinity are All Saints Timberhill, St John the Baptist Timberhill, St Peter Parmentergate, St Julian's Church and St John de Sepulchre. The location of these and other lost churches can be seen on the 1789 map (fig.14). The main approach to the Castle was from the south, passing adjacent to the site along Ber Street.

2.11.3 The 1885 map (fig.15) shows the intricate pattern of streets and terraced buildings that lay on the site at the end of the nineteenth century. All these were removed during the 1960s as part of slum clearance projects. At this time Rouen Road was constructed and the site now occupied by Prospect House was cleared and levelled.

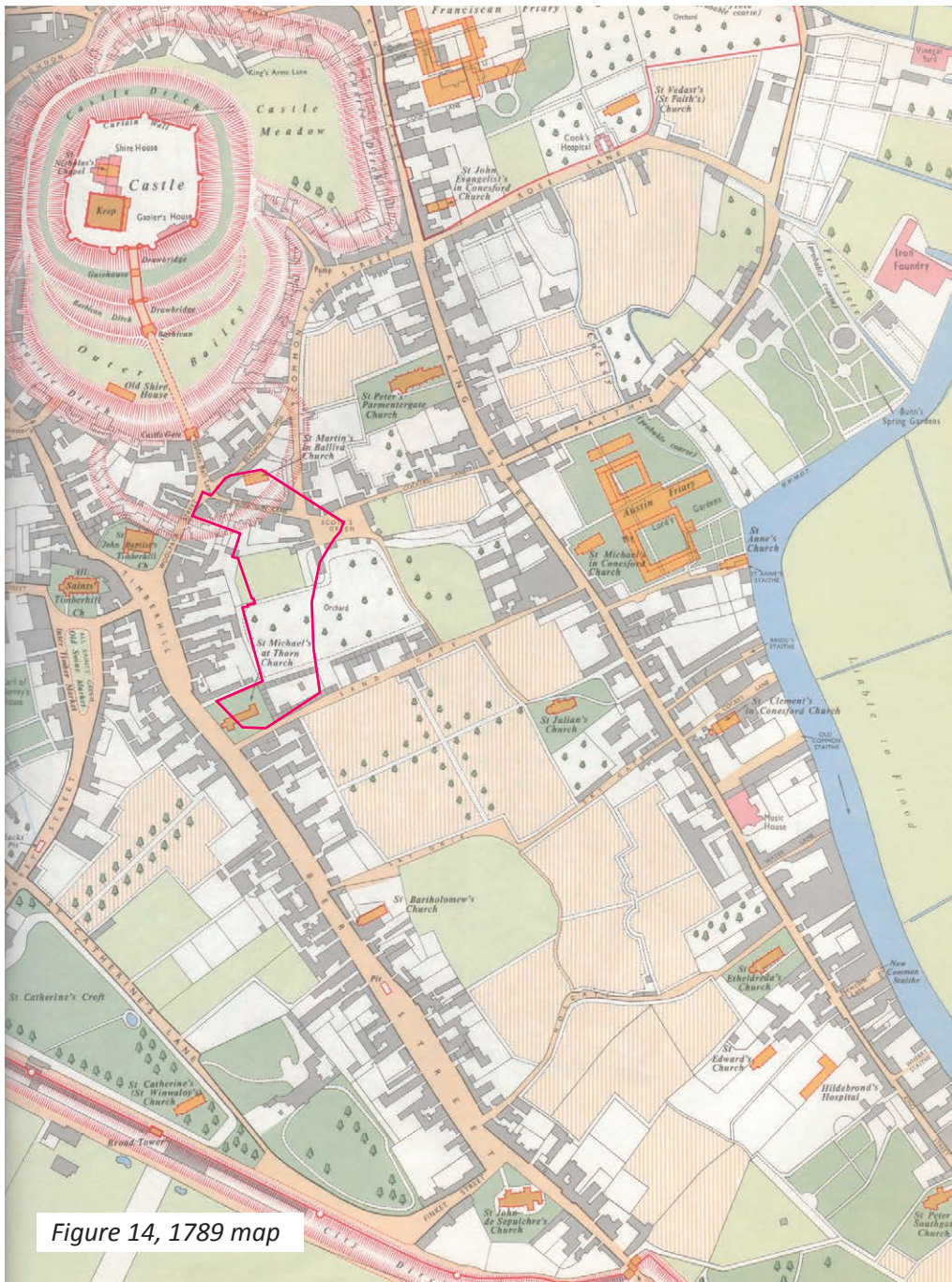


Figure 15, 1885 map

2.11.4 The site is within the city centre conservation area. The conservation area extends across the whole area of the medieval city and is divided up into character areas. The site lies within the Ber Street character area. This character area is described as being “a fragmented area as a result of slum clearances and Second World War bomb damage. Remnants of its earlier character and buildings survive along the long and wide Ber Street, behind which, towards Rouen Road, lies a predominantly mid C20 local authority housing area. The Finkelgate area, at the southern end of Ber Street, leads out across the City Wall boundary into the residential Bracondale area, whilst the northern end of Rouen Road contains a number of large office buildings.”

2.11.5 The appraisal map (fig.16) identifies Prospect House as a negative landmark due to its bulk and massing which is out of scale with the remaining historic development in the area. It also has a poor relationship with the surrounding streets due to the lack of a built frontage on Rouen Road or Thorn Lane and the prominence of surface car parking.

2.11.6 There are 97 listed buildings within 250m of the site. These heritage assets are identified in figure 17. The built heritage assessment considers their history, setting, views, how the setting contributes to their significance and how the site contributes to their significance. Those listed as grade 1 that may be relevant to the site:

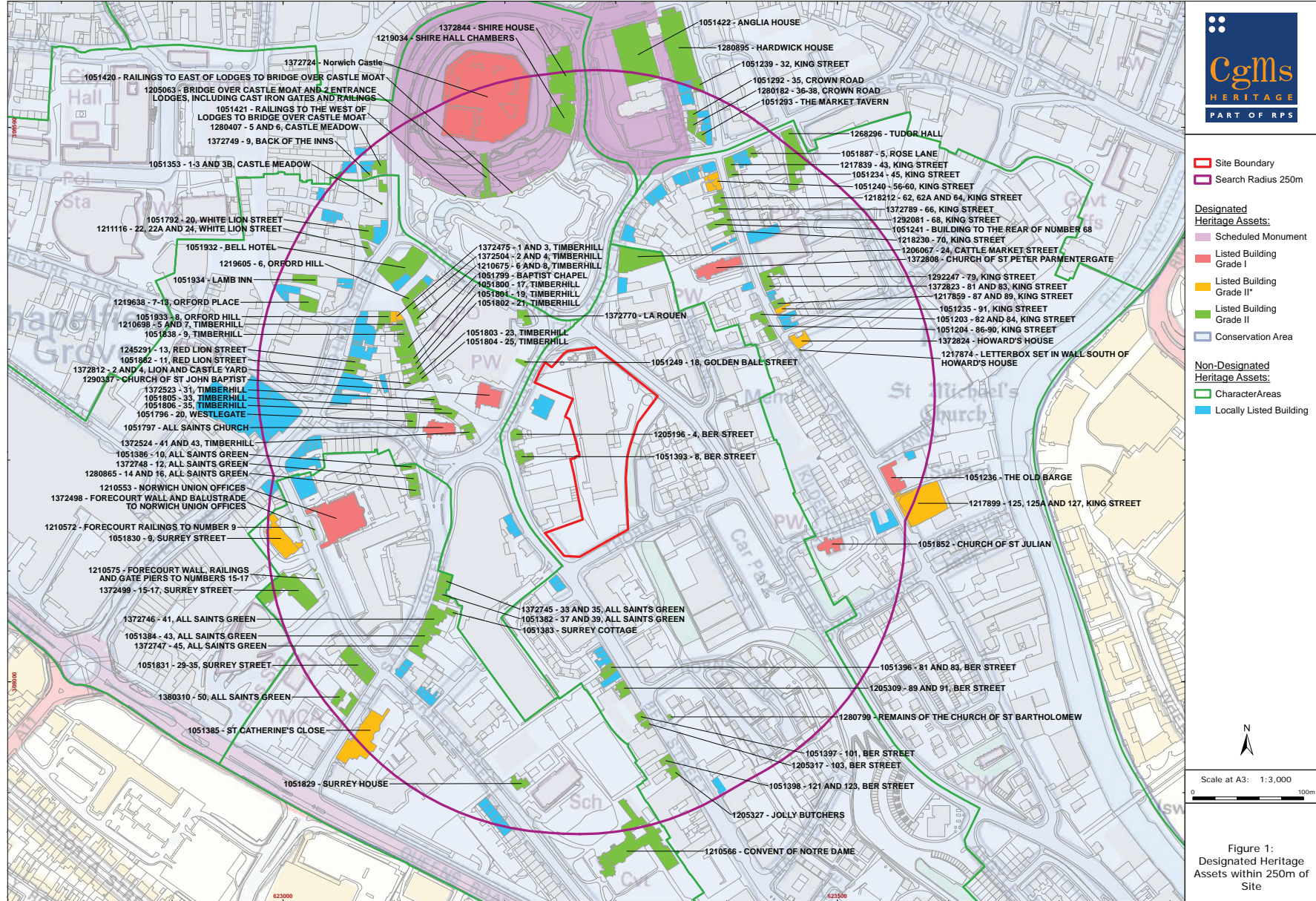


Figure 16 - City centre conservation area appraisal Ber Street character area.

- Church of St John the Baptist, Timberhill
- All Saints Church, Westlegate
- Church of St Peter Parmentergate, King Street
- Church of St Julian, St Julians Alley
- Dragon Hall, 115-123 King Street
- Church of St John de Sepulchre, Ber Street
- Castle, Castle Meadow
- Anglican Cathedral, The Close
- Roman Catholic Cathedral
- Church of St Peter Mancroft, St Peter’s Street
- City Hall, St Peter’s Street
- Church of St Giles, St Giles Street

2.11.7 Other listed buildings that are very close to the site are:

- 18 Golden Ball Street
- 1 Farmers Avenue
- 4 Ber Street
- 8 Ber Street
- 24 Cattle Market Street
- Timberhill, Westlegate and All Saints Green group
- Ber Street group south of the site



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Figure 17 - Designated heritage assets with in 200m of site.

2.11.8 The Woolpack PH, sitting immediately adjacent to the site, is locally listed.

2.11.9 The development of the site must respect the statutory duty to preserve or enhance the special character of the conservation area as defined in the conservation area appraisal and the requirements of development management policy DM9 and NPPF paragraphs 184 to 202. The management and enhancement policies in the appraisal include:

- Reinstatement of a strong building line along Ber Street
- Views to and from the Ber Street ridge must be preserved and enhanced
- Development on Rouen Road and the east side of Ber Street must respect the important topography of the area.
- In areas of low significance the prevailing scale of existing buildings should be respected, but the careful siting of taller buildings and use of larger scaled buildings in appropriate locations will be encouraged, provided that they do not negatively impact on important views of city wide and local landmarks or affect the setting of listed buildings.

2.11.10 The information from the built heritage analysis enabled a “heat map” to be produced that seeks to identify the height thresholds above which buildings on different parts of the site are likely to have a major impact on the setting of heritage assets (see figure 18). Existing heights are shown

in figure 19. The annotations on the heat map provide a detailed commentary and rationale for the recommended storey height thresholds taking into account the impact of both proximate and more distant identified heritage assets and the likely impact of new development on the viewpoints identified in Figures 20 & 21. Sixteen viewpoints have been identified where it is anticipated that development proposals would be visible in the context of designated heritage assets, representative townscape and the city centre conservation area as well as its wider setting. Detailed proposals would require further evaluation of the viewpoints as part of a future planning application including a Townscape and Visual Impact Assessment. The heat map should be treated with caution and its limitations and applicability are explained in appendix 1.

2.11.11 The sensitivity to the surrounding built heritage is not the only constraint on building height and massing. The relationship with neighbouring residents is also important. The new buildings should not have an unacceptable impact on the amount of sunlight or daylight that enters their properties. The most sensitive relationship is with the occupants of flats in the lower levels of Warmingier Court that face Thorn Lane. The development site is to the north which means that sunlight will not be affected other than in the late afternoon and evening in mid-summer when the sun sets over John Lewis. However, the amount of visible sky and daylight will be affected. It is inevitable that there will be some reduction in daylight given that a surface car park currently lies opposite. In order to judge an acceptable amount of daylight loss a rule of thumb would be to keep new building below




Figure 19

BUILT HERITAGE SENSITIVITY—HEAT MAP

Sensitivity to Built Heritage Assets—Heat Map

Colour Key:

-  **Violet—Extreme sensitivity:** buildings above 4 storeys likely to have a major impact on the setting of heritage assets
-  **Red—Very High sensitivity:** buildings above 5 storeys likely to have a major impact on the setting of heritage assets
-  **Orange—High sensitivity:** buildings above 6 storeys likely to have a major impact on setting of identified heritage assets
-  **Yellow—Medium sensitivity:** buildings above 7 storeys likely to have a major impact on setting of identified heritage assets
-  **Green—Low sensitivity:** buildings above 8 storeys likely to have a moderate-major impact on setting of identified heritage assets. Buildings of 9 storeys plus likely to have a major impact on setting of heritage assets of high significance within the extended setting of the Site.

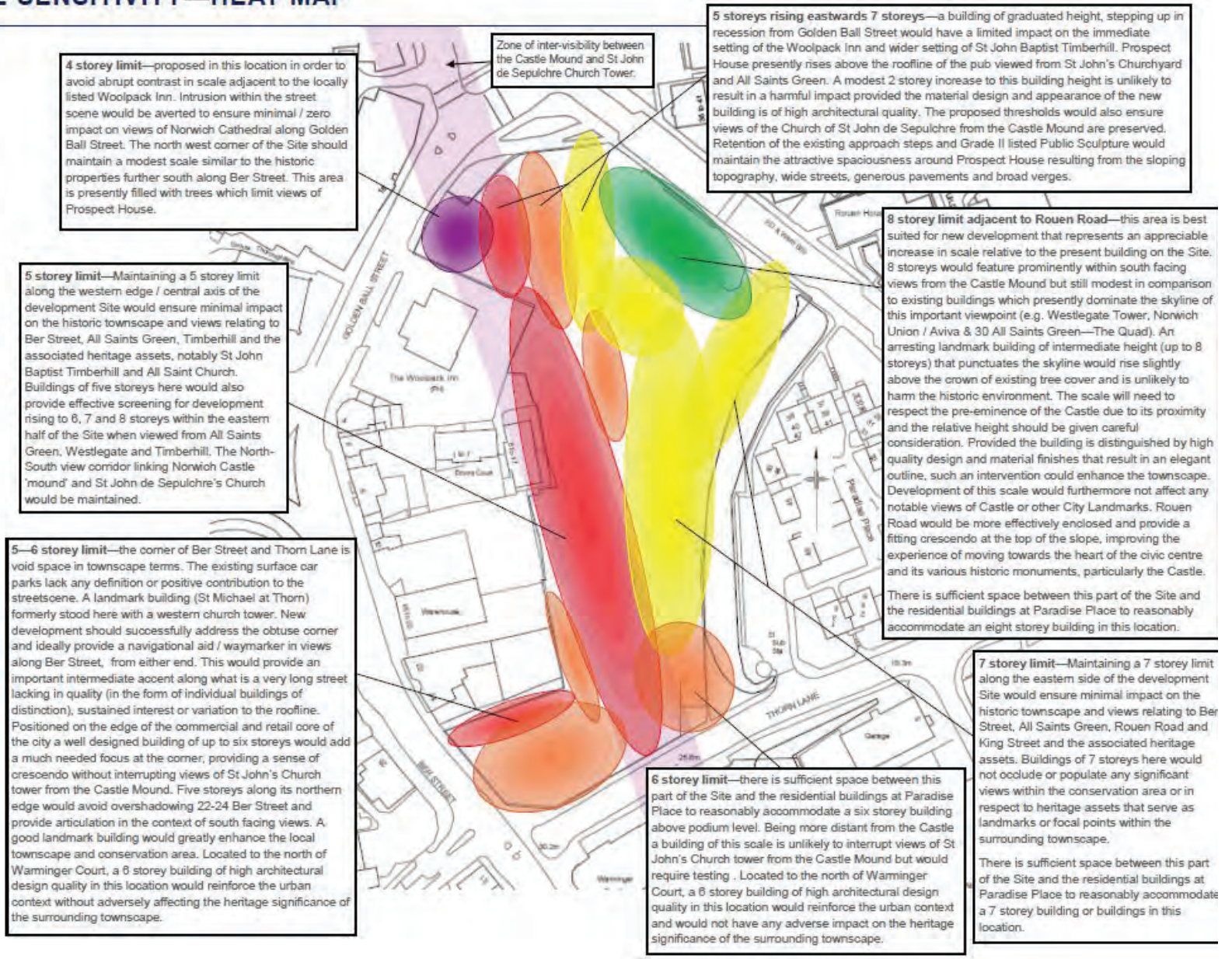


Figure 18

the level of a 45 degree line drawn from the ground floor windows of the building. When a planning application is produced for the site the architectural proposals would need to be tested against the BRE guidance in “Site layout planning and sunlight” (2011). At this stage we have taken a cautious view that a building predominantly in the range of 4-5 office storeys at 4.2m floor to ceiling height will not unacceptably reduce the daylight available to the residents of Warmingier Court. The buildings erected on the part of the site close to Emms Court are restricted in height to 4-5 residential storeys and there should be sufficient distance between the building to avoid unacceptable overlooking or overshadowing. The properties at Paradise Place do not have their main residential windows facing towards the site and there is a buffer of trees so taller buildings would be allowed on the east site of the site.

2.11.12 The height thresholds proposed for the site, which have been determined through a combination of built heritage and residential sensitivity, are shown in figure 22. At this stage these parameters are indicative. When a planning application is prepared for the site the thresholds may be adjusted in response to architectural treatment, information on visual impact in relation to heritage impact and development viability.

2.11.13 The prominence of this site and its location within the conservation area will require a high quality architectural response. A design competition would be a good way of maximising the prospects of a good architectural outcome, especially for prominent buildings at the



Figure 20

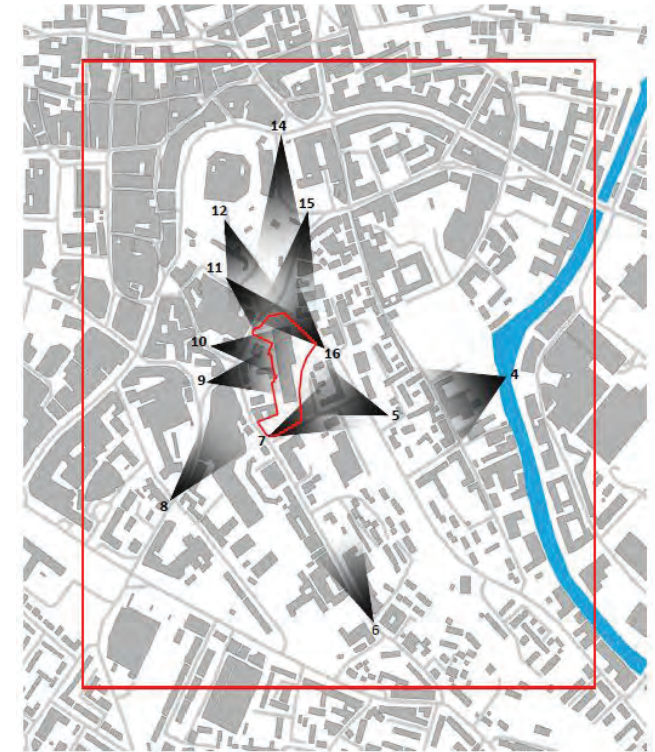


Figure 21

corner of Thorn Lane and Ber Street and at the northern end of the site.

- 1 - Mousehold Avenue (northeast corner of allotments)
- 2 - Motram Monument, St James' Hill
- 3 - Ketts Heights (Armada beacon)
- 4 - Lady Julian Bridge
- 5 - St Julian's Alley (10m NW of St Julian's Church)
- 6 - Ber Street (south) west side opposite junction with Mariner's Lane
- 7 - Ber Street (north) west side opposite junction with Thorn Lane

- 8 - All Saints Lane (Surrey Street junction)
- 9 - South of All Saints Churchyard, Westlegate
- 10 - Timberhill, approx 20m west of St John Baptist Church
- 11 - Farmers Avenue (north side) west of road entrance to Castle Mall Gardens
- 12 - Castle Mound (south side) west of bridge over Castle Moat
- 13 - Magdalen Street (west side) at junction with Edward Street
- 14 - Bank Plain (north side) at junction with Market Avenue
- 15 - Market Avenue (north side) opposite junction with Cattle Market Street
- 16 - Rouen Road (east side) adjacent to Rouen Road

Building Height Thresholds

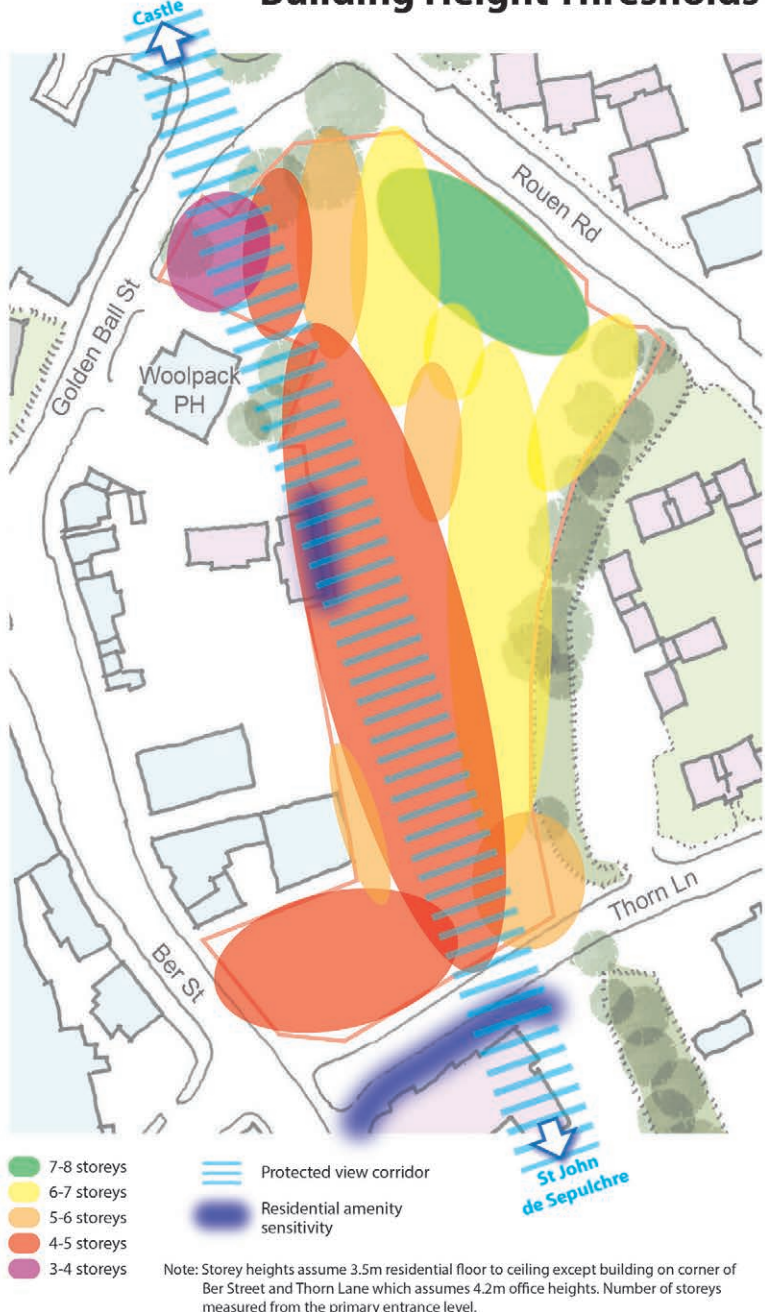


Figure 22

3.0 Development principles

Development of the site must fulfil the following development principles:

A. Planning Policy - Uses

- A.1 The existing lower grade accommodation should be replaced with purpose built, flexible and attractive high quality office space, ideally in a prominent location such as the Golden Ball Street frontage or the junction of Ber Street and Thorn Lane.
- A.2 A residential-led development with market housing and affordable housing is welcome on the site. At least 33% of units should be affordable, split 85% social rented and 15% of intermediate provision. They should be predominantly 1-bedroom flats. 2-bedroom houses would also be welcomed. The affordable housing should be provided on-site (not off-site commuted payment) in separate blocks with no visible distinction in quality of location, outlook or design.
- A.3 Retail can be part of the mix of uses providing it is well connected to the existing primary retail area, such as the ground floor on Ber Street.
- A.4 A minimum of 250 dwellings and 30,000 sq ft office space should be provided on site in order to ensure that this centrally located brownfield site makes an appropriate contribution to housing provision and that jobs are retained in the city centre

B. Pedestrian routes and public spaces

- B.1 New pedestrian routes across the site should be provided east-west through from 10-14 Ber Street to Rouen Road and north-south from Thorn Lane to Cattle Market Street.
- B.2 New public spaces should be created:
- Adjacent to the upper section of Thorn Lane.
 - In the centre of the site at the intersection of a new east-west route from Ber Street to Rouen Road and the new north-south route from Thorn Lane to Castle Gardens / Farmers Avenue
 - As connected spaces at the north end of the site that provide a protected residential courtyard and an elevated terrace on the Golden Ball Street frontage with views to the Castle and Cathedral

C. Vehicles

- C.1 The main vehicular access should be off Rouen Road. A secondary access could be at the lowest part of the site on Thorn Lane providing it does not undermine the quality of the public space and pedestrian connection to be created on the upper part of Thorn Lane.
- C.2 A car-free development is encouraged and if car parking is included it should be substantially below 1:1 for household. No parking would be allocated for retail uses. A car club parking space and car club vehicle must be provided.
- C.3 Any car parking should be contained beneath the buildings at the northern end of the site. Electric charging facilities for vehicles should be

provided

D. Landscape

- D.1 The recently listed Bernard Meadows sculpture must be retained within the new development.
- D.2 Boost biodiversity within the site to support green infrastructure connections between the Wooded Ridge, Castle Gardens and Green, Chapelfield Gardens, Norwich Cathedral / The Great Hospital and the River Wensum should be enhanced including: Sustainable Urban Drainage (SUDS), green roofs and walls, retention of mature trees, planting new vegetation and installing boxes for birds, bats, hedgehogs and insects.
- D.3 Existing views to the Castle, Cathedral, City Hall, St John de Sepulchre, and the wooded ridge should be enhanced.
- D.4 Informal publicly accessible recreational open space and younger children's playspace should be provided towards the middle of the site in places that are overlooked by homes.
- D.5 Grade A and B trees should be retained, especially those on the Golden Ball Street frontage with extensive planting of new trees within the public spaces on the site.

E. Energy

- E.1 Generate at least 10% of the scheme's expected energy requirements through sources of decentralised and renewable or low-carbon energy.

- E.2 Dealing with water by ensuring: a) external ground levels have a nominal fall away from any entrances to buildings, with ground levels maintained above the adjacent highway, b) foul and surface water runoff connect into Anglian Water's sewer network and discharge by gravity; c) at least 50% reduction in discharge of surface water from the site using the a combination of the following SUDS techniques: ponds, blue roofs, swales, bio-retention areas, green roofs, grey water recycling from roofs and permeable paving.
- E.3 Ground investigation and remediation secured by inclusion of contaminated land planning conditions.

F Historic built environment

- F.1 Preserve or enhance the conservation area and avoid harm to the setting of listed buildings.
- F.2 Reinststate a strong building line along Ber Street.
- F.3 Development on Rouen Road and the east side of Ber Street must respect the topography of the area.
- F.4 The height thresholds proposed for the site, which have been determined through a combination of built heritage and residential sensitivity, are shown in figure 22. At this stage these parameters are indicative. When a planning application is prepared for the site the thresholds may be adjusted in response to

architectural treatment, information on visual impact in relation to heritage impact, residential amenity and development viability.

- F.5 The prominence of this site and its location within the conservation area will require a high quality architectural response.
- F.6 The site has archeological potential. A developer must seek to minimise harm to heritage assets with archaeological interest through its design and demolition / construction methodologies and maximise the public benefits of any archaeological investigations carried out at the site through community engagement, research partnerships and wide-ranging dissemination of the results. An archaeological desk based assessment should be submitted with, or at least prior to the determination of, a planning application in accordance with NPPF (2018) paragraph 189. Based on the findings of the assessment there may be a need for some pre-determination evaluation trenching, particularly around the site of St Michael at Thorn church

4.0 Illustrative proposal

4.1 When detailed plans are developed for the site they will need to comply with the development principles and parameters in section 3. These development principles could be fulfilled by many different permutations of development on the site. One way that these principles and parameters can be satisfied is illustrated in this section.

1. Routes & Public Squares



Figure 23

2. Key Views

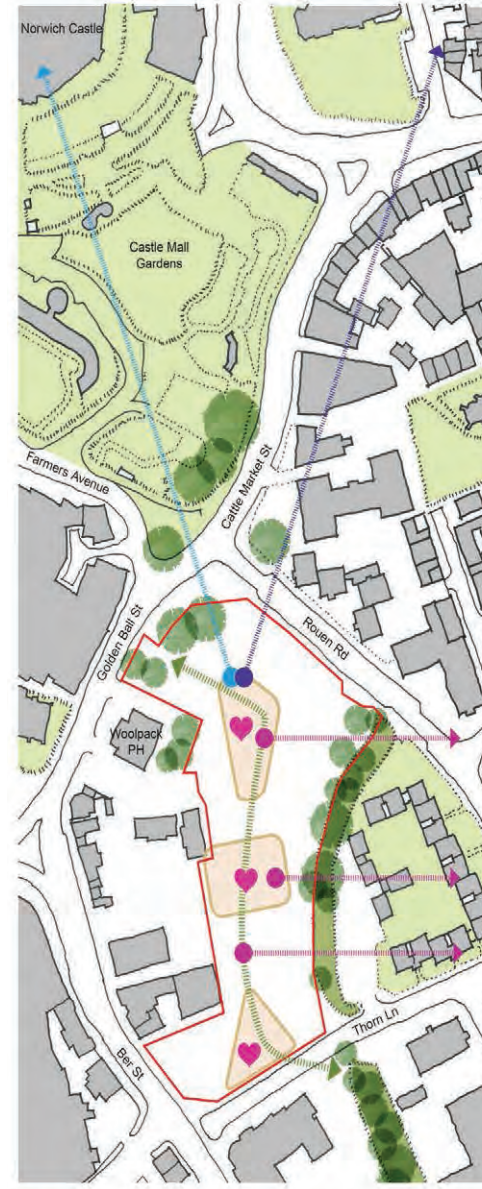


Figure 24

3. Illustrative Site Layout & Building Uses



Figure 25

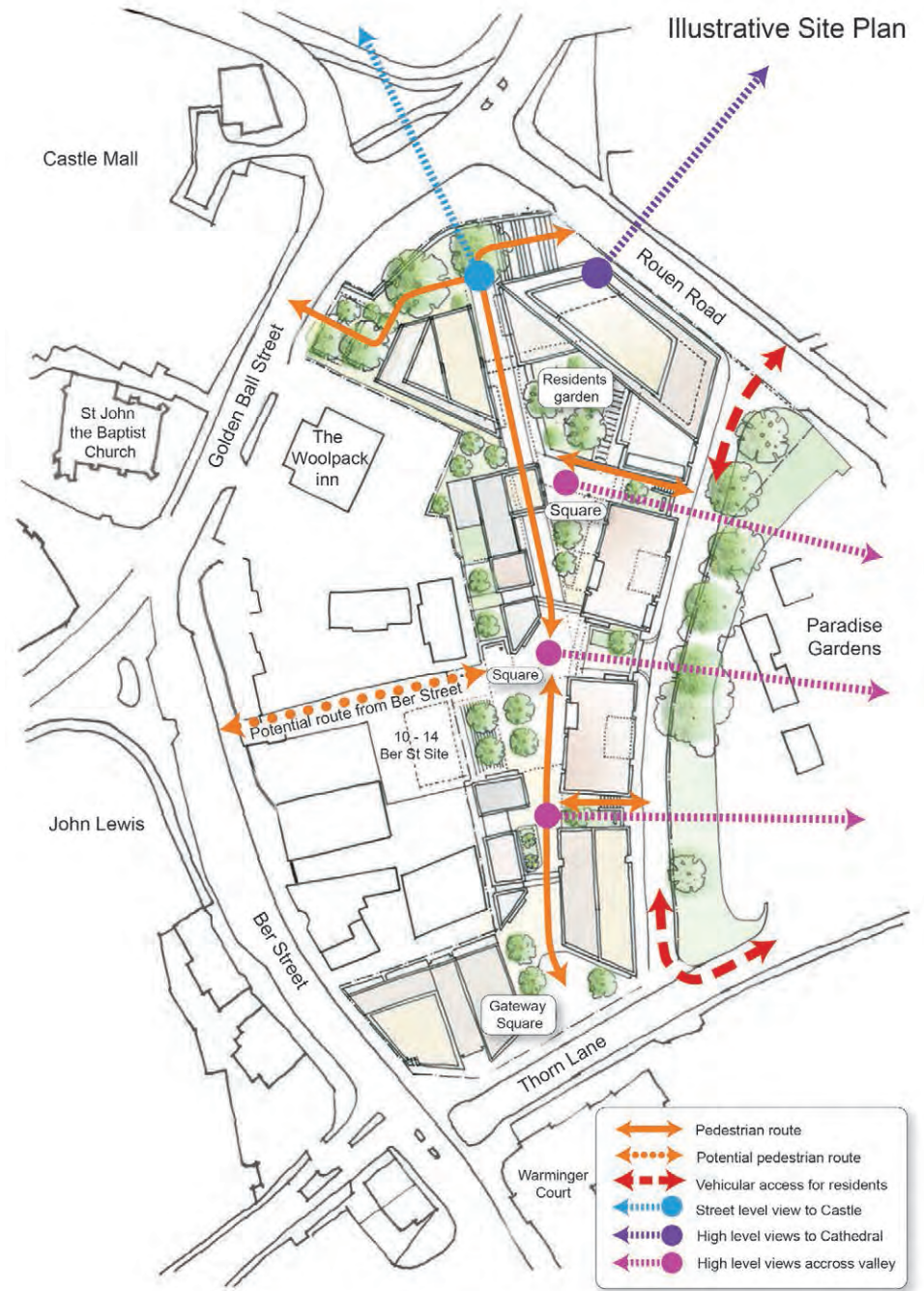


Figure 26

Appendix 1 – Using the heat map (fig. 18)

The purpose of the heat map diagram (fig 18) is to indicate where and to what extent development on the site is likely to have an impact on the setting of heritage assets covered within the assessment (i.e. within a 250m radius plus the City Landmarks). The likely magnitude of impact will be gauged in proportion to the scale of proposed development, proximity to heritage receptors and the relative sensitivity of those receptors. The various degrees of sensitivity (represented by a clearly legible heat-associated colour spectrum) indicate the recommended thresholds for the scale of new development in each part of the site. The heat map is intended to serve as a guide for the design development and in helping to determine what the likely magnitude of impact would be if the proposed threshold is exceeded in isolation. Where coloured zones on the map may overlap it is to be assumed that the zone of higher sensitivity takes precedent over any less sensitive zones adjacent. It should be noted that the proposed Heat Map will provide general guidance and does not in itself comprise an assessment of impact. The precise gauge for the impact on setting, and thereafter heritage significance, is one of professional judgement and will need to take account of the detailed design, architectural vocabulary and effect of the material finishes used throughout the development as well as its cumulative impact.

In terms of practical guidance the Heat Map will seek to establish an indicative upper threshold beneath which new development of good design quality would not be expected to have a major impact, whether adverse or beneficial, on the setting of heritage assets. It is acknowledged that the cumulative impact that may result from new development which approaches the recommended thresholds in all the parts of the site cannot be deduced by reference to the proposed thresholds alone. Likewise, it is accepted that where the thresholds are exceeded development is likely to have a major impact on the setting of heritage assets, potentially causing a degree of harm. Additional factors, however, such as the present conditions of the site and the overall design quality of the scheme, will need to be taken into consideration in order to determine the level of harm that proposed development will ultimately give rise to. Similarly the aggregate impact on cumulative heritage significance and townscape is something which will need to be judged independently and is beyond the scope of what the Heat Map is able to convey in terms of qualitative guidance.

The annotations on the heat map provide a detailed commentary and rationale for the recommended storey height thresholds taking into account the impact of both proximate and more distant identified heritage assets and the likely impact of new development on the viewpoints identified in Figures 20 & 21.

Appendix 2 - Prospect House Development Brief

Consultation report

Background

A public consultation inviting comment on the draft Prospect House development brief was held between 29 June 2018 and 3 August 2018. The brief itself was available and its content was summarised in an exhibition held in City Hall and at Prospect House for the first two weeks of the consultation period. All the material was available on the city council's website. It can be viewed [here](#).

The consultation was publicised through:

- A news release issued by the City Council which resulted in an article in the EDP and Evening News
- Letters sent to businesses and residents within the area identified in appendix 2.1 inviting them to comment.
- Emails sent to the following stakeholder organisations inviting them to comment: Bicycle Links, Norwich Business Improvement District, Castle Mall, Norwich Cycling Campaign, Historic England, King Street Neighbours, Kings Church, Norfolk Museums Service, Norwich Society, Wensum Sports Centre.

The city council's design conservation and landscape manager attended the exhibition at City Hall on 5 July and 13 July 2018 and two meetings:

- Residents of Warminger Court 23 July 2018 at Warminger Court (approx 35 residents attended)
- King Street Neighbours 1 August 2018 at the Last Man Standing PH on King Street (approx. 15 people attended)

Analysis of responses

Comment was invited via an online survey. The survey was structured to ask people whether they agreed with each group of development principles in the draft brief. If they did not agree they were invited to say what was wrong or missing from those principles.

There were 32 responses to the online survey. 16 of the respondents supplied their property address and of these 8 live close to the site including 4 at Warminger Court. The balance of positive and negative responses is calculated and the free text responses for each question are reproduced in the tables below. An officer response is given to each comment.

Letters were received from Historic England and John Lewis (see appendix 2.2). A response to these is offered in the planning committee report.

Development principles for uses – Text in draft brief reproduced below

- A.1 The existing lower grade accommodation should be replaced with purpose built, flexible and attractive high quality office space, ideally in a prominent location such as the Golden Ball Street frontage or the junction of Ber Street and Thorn Lane.
- A.2 A residential-led development with market housing and affordable housing is welcome on the site. At least 33% of units should be affordable, split 85% social rented and 15% of intermediate provision. They should be predominantly 1-bedroom flats. 2-bedroom houses would also be welcomed. The affordable housing should be provided on-site (not off-site commuted payment) in separate blocks with no visible distinction in quality of location, outlook or design.
- A.3 Retail can be part of the mix of uses providing it is well connected to the existing primary retail area, such as the ground floor on Ber Street.

Question 1a Do you agree with the development principles for uses (A1-3)?	Number	Percentage
Yes	15	47%
No	16	50%
No response	1	3%

Question 1b If you do not agree with the development principles for uses (A1-3) what is wrong or missing?		
Ref	Comment	Officer response
1	I'm surprised by the requirement that affordable housing should be in separate blocks (rather than integrated throughout the development).	Affordable housing providers generally prefer clusters of housing which makes management administratively easier (e.g. shared communal areas, service charge levels). What is important is that these clusters are not too large and that the architecture is indistinguishable for the private sale housing so no stigma attaches to the affordable housing and that it is of equal quality.
2	I agree in principle but the height of the proposed buildings are completely	The proposals have been modified since the consultation to reduce the height

	out of scale with surrounding structures.	thresholds in line with the built heritage assessment that informs the brief.
3	The social percentages, though understood, are too high. There should be more properties overlooking the castle. There is room for the site to be higher, I would have thought. Keeping jobs in the city is good.	It is important to provide homes for people who cannot afford to buy or rent in the market. The majority of the site is likely to be market housing so there will be a balanced community. The tallest area of building on the site is likely to contain flats with a view of the castle. It would be inappropriate to build the flats higher than the levels shown in the brief because this would have a damaging effect on the setting of surrounding heritage assets e.g. Woolpack pub.
4	Prospect House is a building in a prominent position in Norwich - any change makes a significant difference to the landscape. It is a fine example of Brutalist architecture and its flint facing is a counterpoise to the historic Norwich Castle.	Agreed that changes to the site will make a significant difference to the landscape. The built heritage assessment and Historic England have concluded that it is well below the quality needed for the building to be listed and it is regarded as a negative building in the conservation area appraisal. The site can be better used if Prospect House is replaced. Furthermore, the floor plan of Prospect House does not lend itself to efficient and economically viable conversion due to the depth of the floorplate.
5	The architecture of prospect house is a fine example of brutalist architecture and is a landmark of the city. Instead of pulling it down you should focus on repurposing it so that we can celebrate its rich history. We do not need even more new flats in this city either.	See comment ref 4 about the retention of Prospect House. More flats are needed because there is a housing shortage and it is a good building type to efficiently and intensively develop centrally located brownfield sites.
7	A bit concerned re- social housing?	The nature of the concern is not explained in the comment.
8	High rise will block sunlight from my current apartment. Housing estate would lower property value. Green areas may attract layouts.	The site is not to the south of residential properties and therefore the reduction in sunlight would be low. A "housing estate" is not proposed and, although the effect on existing resident's property values is not a material planning consideration, it is expected creating a high quality development on a site that has large

		areas of surface car parking would generally increase property values.
9	Large numbers of flats in this area already. Why develop yet more?	See comment ref 5 about the need for flats.
10	<p>The first part of any assessment in a conservation area is that of the merit of existing buildings. Prospect House is well designed and sits extremely well in its position on the hill and does not attempt to compete with the castle. It should be earmarked for retention.</p> <p>The second thing that should be done is the assessment of what outstanding needs the city has that this site might need. The most obvious is that the city needs a facility to cater for tourist coach trips. Many operators will not come to the city because of this lack and the tourist trade suffers quite badly as a result. The other need is for a school in the area. The county has eyes on the Rouen Road car park but this site would be suitable, and the car park site is much more suitable for housing.</p>	See comment ref 4 about the retention of Prospect House. The position on the hill can be better exploited through the construction of taller buildings there that emphasise the topography. Providing a facility for tourist coaches is not needed here. The city has a strategy for this – short stay is provided on Rouen Road and long stay at P&R sites. Using the Prospect House site for this purpose would be a waste of a valuable site.
11	<p>Rouen Road has seen a significant increase in traffic since one road has been shut and traffic lights removed. With more houses and increased footfall to the area, I can only see this getting worse. Unless there is a restructure to Rouen Road to facilitate more cars and increased foot fall to the proposed premises, I can only see this negatively impacting existing residents.</p>	<p>Traffic congestion data has been analysed to check what effect the recent traffic changes have had on Rouen Road. This shows that 2018 levels are very similar to 2015 and 2016 before the work was carried out. Redesigning Rouen Road to facilitate more cars would induce demand for more people to drive and own cars. The recent design changes made it possible for people to walk and cycle between Rouen Road and Farmers Avenue, which was almost impossible before. The way to reduce traffic is to locate development near public transport and make it easy to access the development on foot and by bicycle. This is the approach advocated in the development brief. The current use of the site for employment with generous car parking would generate a higher level of traffic than city centre homes that would be developed on the site. A</p>

		<p>planning application for new employment development on the site is likely to be accompanied by a travel plan that would reduce the traffic generated compared to the current employment use.</p>
12	<p>I am a resident of Warmingier Court, my flat is situated on THE UPPER END OF THORN LANE. By erecting office space on the junction of Ber Street/Thorn Lane which according to the development brief could be 5-7 levels high; we are 4 levels; will considerably block out my natural daylight and sunlight. Also I will have no view out of my windows as ONE SIDE OF Ber Street will be completely obstructed (on the same side as World of Beds). By including retail within this mix you then bring a lot more footfall and with that: ultimately much more noise. As the site is now a car park to the Archant building, on Thorn Lane, this is kept to a minimum because the staff just park and go into building until such time as they then leave again at night. When they have a fire alarm practice the noise scale goes up considerably because the assembly site is the top end of the car park, but this is very intermittent and I understand this is an important procedure. The Prospect House development by the very nature of its content will have a considerable impact from the point of view of noise at all times of day and night, I know it will be considerable as I have experience of when the "football" fans go down Thorn Lane and really considerable noise from the people who go the Waterside via Thorn Lane on a Friday and Saturday night starting at 10pm and going on until 5am and you are lucky if you manage a couple of hours sleep at a time. This site will really create and amplify these problems from the fact of the public areas that are being created right through to the intrusion of the office/retail space that is being</p>	<p>The concerns about levels of daylight enjoyed by residents on the lower levels of Warmingier House the face Thorn Lane have led to a reduction in the height threshold for buildings on this edge of the development from 5-7 to 4-5 storeys. The concerns about sunlight, as distinct from daylight, are not supported because the development is immediately to the north of Warmingier Court. The view from these flats is currently over an ugly surface car park and the blank side of World of Beds, although longer range views of the city can be seen too due to the empty nature of the site. These longer range views will inevitably be obscured by any development of the site and replaced by a positive and carefully designed building frontage and a public space within the site. The opening hours of any retail / café space on the ground floor would need to be controlled to avoid nuisance to residents. It is true that more people will walk up Thorn Lane from King Street to Ber Street as the area is improved and pedestrian connections become more attractive. Some of those people may be boisterous, which is regrettable. However, when the area has a more positive cared-for feeling resulting from good quality development one hopes that this will influence peoples' behaviour. The new public spaces within the development are likely to be privately managed with the responsible organisation wishing to protect new residents against nuisance and keep the spaces well maintained with a collateral benefit for neighbours. The speed of traffic in Ber Street is likely to reduce slightly in response to a</p>

	<p>created. You only need to look outside the Forum, every available space is used including the steps but there is not a high area of residential buildings around there and certainly not a retirement complex. There is already a considerable amount of traffic going up and down Ber Street because of the Westlegate Development: what motorbike does 20 mph? Graffiti and litter, noise, noise, noise at all times and no natural light/sunlight, what sort of existence is that? Westlegate in my opinion is a "ghost" of what was created by the Council, everything has faded, the garden areas are not respected by the public, too much litter and not enough bins, what is to say what the Prospect House development will look like in 2-3 years time after the building work has finished which will be maybe a couple of years of "hell" for the residential areas.</p>	<p>stronger built frontage because the current empty site at the corner of Thorn Lane and Ber Street reduces the perception of motorists that they are passing through a tight city centre environment.</p>
13	<p>I do not agree with more retail frontage when the city already has high level of retail vacancy, unless this is part of a bigger plan to redevelop John Lewis.</p>	<p>The development brief does not require retail space within the development and it will only be provided if there is market demand for it. It is not part of a bigger plan to redevelop John Lewis but the presence of John Lewis and the recent improvements to Westlegate make this part of Ber Street feel more connected to the main city centre shopping areas.</p>
14	<p>Prospect House should be preserved as a fine example of Brutalist Architecture. There is already an oversupply of retail space and one/two-bedroom flats in Norwich. Numerous retail units across the city stand empty so building more is deleterious to the demographic and economic mix of the city.</p>	<p>See comment ref 4 on the retention of Prospect House, ref 13 on the provision of more retail space and ref 5 on the need for flats.</p>
15	<p>Why destroy Prospect house? It will cost a lot more to demolish and rebuild new office space. Why not re-invest in and re-purpose the original building? One of the best things about Norwich is the mix of different</p>	<p>See comment ref 4 on the retention of Prospect House.</p>

	<p>architectural styles, however Brutalist and modernist buildings are disappearing from the city's landscape. There was probably a point in history at which the cathedral seemed outmoded, or the architecture on Elm Hill appeared unattractive and not fit for purpose - if they had been destroyed imagine how different those parts of Norwich would be today! While it is not desirable or affordable to maintain all old buildings, some, such as Prospect House, should be kept for future generations. These should not just be the buildings which those in power deem "attractive" or aesthetically pleasing.</p>	
16	<p>No need for high building on corner of Ber Street/Thorn Lane, will block out light, and spoil the view from our apartment, no need for retail units, there are plenty of empty shops around Norwich.</p>	<p>See comment ref 12 on building heights at the corner of Ber Street and Thorn Lane and comment ref 13 on the provision of more retail space.</p>
17	<p>There is no leisure facilities - swimming, gym - need more affordable sites with cheap parking. Norwich has the most expensive parking - and smallest spaces. Also need more Youth projects (clubs, etc).</p>	<p>The Rouen Road and John Lewis car parks are next to the site so there is sufficient parking in the area. We have a cap on the provision of car parking overall and to encourage people to use P&R. There is a swimming pool and gym quite nearby at riverside and a gym on London Street. There is no identified demand for youth facilities in this location and no justification for insisting that a developer provide / subsidise its provision.</p>

Development principles for pedestrian routes and public spaces – Text in draft brief reproduced below

- B.1 New pedestrian routes across the site should be provided east-west through from 10-14 Ber Street to Rouen Road and north-south from Thorn Lane to Cattle Market Street.
- B.2 Public spaces should be created that relate well to the new pedestrian routes:
- Upper section of Thorn Lane should be created.

- Centre of the site at the intersection of the east-west and north-south routes
- North end of the site with views to the Castle and Cathedral.

Question 2a Do you agree with the development principles for pedestrian routes and public spaces (B1-2)?	Number	Percentage
Yes	18	56%
No	11	34%
No response	3	9%

Question 2b If you do not agree with the development principles for pedestrian routes and public spaces (B1-2) what is wrong or missing?		
Ref	Comment	Officer response
18	I think that a statement about the importance of green space within the development is needed. If the intention is for a green corridor to link the ridge to the castle, then I think this should be made explicit in the nature of the public spaces. In my opinion a predominantly paved area would be unacceptable in this location - it needs to incorporate green space at every level (more akin to the castle mall parkland rather than the recent John Lewis pedestrianisation).	Agree with the sentiment but the importance of green space is adequately covered in development principles D2 and D5 in the landscape section with no need to amend the section on pedestrian routes and public spaces. To do so would be duplication.
19	Again in principle I agree with pedestrian routes through the site but would suggest that Thorn Lane be reopened to allow traffic from the King Street area to exit the city more quickly.	Reopening Thorn Lane would not be a good idea because it would conflict with the enhancement of the street as a pedestrian and cycle route and with traffic access to John Lewis car park. It could only be compatible with the John Lewis car park if traffic lights were installed, but this would lead to queuing and associated air pollution around Warmingier Court. This is a peak hour problem that is likely to be alleviated if there is less commuting associated with office use on the site.
20	In principle I agree with the pedestrian access. However to avoid traffic chaos in Rouen Road, rather than public space could the top of Thorn Lane be reopened to allow traffic from King	See comment 11 and 19.

	Street area to move more quickly away from the city centre.	
21	Thorn Lane should be reopened to traffic. High levels of stationary traffic at peak times cause pollution.	See comment 19.
22	As before - I do not agree with the pulling down of prospect house to make way for new routes.	One of the benefits of demolishing Prospect House and replacing it with a series of buildings with smaller footprints is that it enables better pedestrian movement through the area which enhances peoples' experience of the conservation area and the wooded ridge landscape feature.
23	Access for Ambulances, Taxis which use Thorn Lane for residents of Warmingier Court. Access in Warmingier Court residents Car Park not often able to be used.	Ambulances are not and will not be restricted and taxis are entitled to pick up and drop off on Ber Street.
24	Pedestrian route and open space should be at the junction of Ber Street & Thorn Lane.	There is a stronger urban design argument in favour of building a frontage on this corner to complete the street. Furthermore, the traffic on Ber Street would not make it as attractive a location for people to sit outside compared to the centre of the site on the alignment of the wooded ridge.
25	If the upper section of Thorn Lane is created, how do we at Warmingier Court access our site? Again my concern obviously is how near are you going to bring members of the public to the flats, where is my privacy? Both with the public spaces and the office/shop development that you will create.	There will be no change to essential access. The proposed streetscape enhancement at the top of Thorn Lane would not be designed to encourage people to sit out in front of the Warmingier Court flats. A new building would inevitably attract visitors and users of the building.
26	The current building should be preserved and no new routes or walkways should be created.	See comment reference 4.
27	Don't destroy Prospect House.	See comment reference 4.
28	By closing off upper part of Thorn Lane will make it difficult for access for disabled buses to collect elderly and disabled people from Warmingier Court who rely on these vehicles to	See comment 23.

	get to local day centres.	
29	This will lead to an increase in noise and anti-social behaviour in the area. It's bad enough now with the drunks on Friday/Saturday nights using Thorn Lane as their route home to south of the city.	See comment 12.

Development principles for vehicles – Text in draft brief reproduced below

- C.1 Main vehicles should access the site from Rouen Road. A secondary access could be at the lowest part of the site on Thorn Lane providing it does not undermine the quality of the public space and pedestrian connection to be created on the upper part of Thorn Lane.
- C.2 A car-free development is encouraged and if car parking is included is should be substantially below 1:1 for household. No parking would be allocated for retail uses. A car club parking space and car club vehicle must be provided.
- C.3 Any car parking should be contained beneath the buildings at the northern end of the site.

Question 3a Do you agree with the development principles for vehicles (C1-3)?	Number	Percentage
Yes	14	44%
No	14	44%
No response	4	12%

Question 3b If you do not agree with the development principles for vehicles (C1-3) what is wrong or missing?		
Ref	Comment	Officer response
30	I have great concern regarding the increased traffic entering and exiting Rouen Road. At peak times the queue waiting to enter Golden Ball St can be as far back as St Julian's Church. I suggest reopening the top of Thorn Lane and also providing a slip road for traffic turning left at the top of Rouen Road. At present if a car is turning right it blocks any farther movement of traffic from exiting	See comment ref 11 and 19.

	Rouen Road.	
31	<p>I have great concern regarding the traffic in Rouen Road. At peak times the queue to exit onto Cattle Market Street backs up beyond St Julian's church. A filter lane to turn left at the top of Rouen Road could help to ease the problem.</p> <p>This site is a great opportunity for electric car parking. But let's be realistic, too much limitation on cars will deter people from living in the city - just look at St Ann's Quarter - one per flat.</p>	<p>See comment ref 11.</p> <p>The brief has been amended to include a requirement for electric car parking.</p> <p>Recent experience of completed city centre schemes indicates that car parking is often under used due to the ease of walking to work and facilities, which is why we encourage developers to provide less than 1:1.</p>
32	<p>Lower Thorn Lane no good for residents of Warmingier Court. Residents would not be able to walk up Thorn Lane to their homes.</p>	<p>The meaning of this comment is unclear.</p>
33	<p>There are already a large number of flats etc in this area with no parking provision. While the council may aspire to create a car free environment it is not practical and there will be many issues for those people using the permit areas.</p>	<p>There will be no entitlement to permit parking by new residents of this development so it will not place additional pressure on car parking in the area.</p>
34	<p>Car parking on a 1:1 basis is too high. As a resident it is already a struggle to exit Rouen Road without sitting in an extended queue.</p>	<p>We need to adhere to our local plan policy of a maximum of 1:1 but would encourage a lower level. Residential car parking in the city centre results in fewer traffic movements than commuter parking associated with office development, especially at peak times.</p>
35	<p>Car parking beneath the buildings will create another level, to re-iterate we are only 4.</p>	<p>Noted. This has been taken into account in the assessment of heights, which are measured from the entrance podium level.</p>
36	<p>The existing building should be preserved with the existing car park. There is no provision for safe and secure cycle parking. New cycle routes should be created.</p>	<p>See comment ref 4 on the existing building. Cycle parking will be provided in line with the local plan policy. There is no need to introduce new cycle routes through the site because connectivity is already good and the east-west gradients would prevent it.</p>
37	<p>Don't destroy Prospect House.</p>	<p>See comment ref 4 on the existing building.</p>
38	<p>Access needed for disabled and elderly</p>	<p>There are no plans to restrict these</p>

	vehicles at top of Thorn Lane.	vehicles.
39	Terrible - no spaces for retail or leisure - totally stupid.	Unclear whether this comment is requesting or rejecting the inclusion of retail and leisure in the scheme.
40	If there is no on-site retail parking, then retail premises will be a waste of time. No vehicular access at all should be allowed from the site onto Thorn Lane. This is to maintain the peace and quiet in Paradise Place.	Shops in the city centre work very well without dedicated parking providing they can make deliveries. Shoppers and staff have ample opportunities to park in nearby car parks or P&R. The main vehicular access would be from Rouen Road. The traffic levels associated with any secondary access from Thorn Lane would be assessed at application stage in relation to the impact on residents of Paradise Place.

Development principles for landscape – Text in draft brief reproduced below

- D.1 The Bernard Meadows sculpture should be reinstated within the new development.
- D.2 Boost biodiversity within the site to support green infrastructure connections between the Wooded Ridge, Castle Gardens and Green, Chapelfield Gardens, Norwich Cathedral / The Great Hospital and the River Wensum should be enhanced including: Sustainable Urban Drainage (SUDS), green roofs and walls, retention of mature trees, planting new vegetation and installing boxes for birds, bats, hedgehogs and insects.
- D.3 Existing views to the Castle, Cathedral, City Hall, St John de Sepulchre, and the wooded ridge should be enhanced.
- D.4 Informal publicly accessible recreational open space and younger children’s playspace should be provided on site in places that are overlooked by homes.
- D.5 Grade A and B trees should be retained, especially those on the Golden Ball Street frontage with extensive planting of new trees within the public spaces on the site.

Question 4a Do you agree with the development principles for landscape (D1-5)?	Number	Percentage
Yes	17	53%

No	8	25%
No response	7	22%

Question 4b If you do not agree with the development principles for landscape (D1-5) what is wrong or missing?		
Ref	Comment	Officer response
41	As before, I think a statement is missing here regarding the explicit nature of the landscape. I think it is important that the public spaces feel predominantly green, rather than predominantly paved. This requires substantial planting and green landscaping below eye level (as well as trees above).	The analysis and policy D2 put sufficient stress on the importance of planting for amenity and biodiversity.
42	Hopefully the open areas would be green spaces rather than tarmac or paved areas - a much more pleasant environment for people and wild life.	Noted.
43	I can't take the wooded ridge point seriously if the council allows the path behind the old people's flats to be rubbish and graffiti strewn. The Meadows statue has a role as public art but will be wasted on the site. Should go somewhere more prominent in the City or say Sainsbury centre. Trees should be in proportion. The ones currently on the Castle side are a species much too big for a cityscape.	The completion of the wooded ridge through the site would encourage more use and support the case for investment in the wooded ridge through the community infrastructure levy to reduce anti-social behaviour. The Meadows statue is now listed and must remain on the site. Disagree about the size of the trees which provide a range of environmental services and are a visual foil for the large building on the site.
44	Tree on Thorn Lane opposite Warming Court, please don't remove!	The tree report has concluded that this tree is category C and its removal can be justified. Its retention is incompatible with development of a positive new building on this part of site.
45	Please no children's playspace near the Warming Court development, the public spaces that will be created virtually opposite will generate enough noise 24-7. Encouraging the wildlife and anything "green" is happily accepted.	Children's playspace would be best situated towards the centre of the site away from traffic and where it can be overlooked by the new homes. Policy D4 has been modified to reflect this.

	The Bernard Meadows sculpture should stay where it is and the existing building (Prospect House) should be preserved as a historic landmark of Norwich. The sculpture represents hot metal - and as such reflects the importance of the building to Norwich as the long-standing headquarters of the region's local newspaper. To take it out of context would be disastrous and a gross disservice to the history and the people of Norwich.	The Meadows sculpture is now listed and must remain on the site.
46	Plant some more hedges or build a roof garden - don't demolish Prospect House.	See comment ref 4 on the removal of Prospect House.
47	I agree with D3, enhance the views of the castle etc. But if you build on the corner of Ber Street and Thorn Lane you will block out our views unless the buildings are single storey.	A single storey building on the site would look absurd and be a waste of important city centre development land. The loss of long views from Warmingier Court is an inevitable result of development of any sensible scale.
48	Absolute guarantee of ALL existing trees on the Archant site safeguarded throughout any development. Any play spaces must be centrally located to avoid noise nuisance to current dwellings.	The policy expects all grade A and B trees to be retained. Some of the other trees may need to be removed because they sit within areas of surface car parking that can be more positively used for building.

Development principles for energy, water and land – Text in draft brief reproduced below

- E.1 Generate at least 10% of the scheme's expected energy requirements through sources of decentralised and renewable or low-carbon energy.
- E.2 Dealing with water by ensuring: a) external ground levels have a nominal fall away from any entrances to buildings, with ground levels maintained above the adjacent highway, b) foul and surface water runoff connect into Anglian Water's sewer network and discharge by gravity; c) at least 50% reduction in discharge of surface water from the site using a combination of the following SUDS techniques: ponds, blue roofs, swales, bio-retention areas, green roofs and permeable paving.

E.3 Ground investigation and remediation secured by inclusion of contaminated land planning conditions.

Question 5a Do you agree with the development principles for energy, water and land (E1-3)?	Number	Percentage
Yes	22	69%
No	4	12%
No response	6	19%

Question 5b If you do not agree with the development principles for energy, water and land (E1-3) what is wrong or missing?		
Ref	Comment	Officer response
49	Not enough detailed information.	It is sufficiently detailed for a development brief.
50	Demolishing and rebuilding on this site is environmentally harmful. There is already a huge strain on our waste water system, due to overdevelopment in the city centre. The existing building should be preserved and converted - that is the greenest option.	It is true that the embodied energy in the building will be wasted through the process of demolition but this will be more than offset by the clearance of the site allowing a more dense development thereby avoiding greenfield development that generates carbon emission through a greater need to travel by car.
51	The proposals E1, 2 and 3 are good, but could roof water be captured as grey water for toilet flushing and other non-food or health related water uses? Could the target for renewable energy generation be higher?	Grey water recycling from roofs has been added to policy E2. This brief cannot set a higher target for renewable energy generation than the JCS.

Development principles for historic built environment – Text in draft brief reproduced below

- F.1 Preserve or enhance the conservation area and avoid harm to the setting of listed buildings.
- F.2 Reinststate a strong building line along Ber Street.
- F.3 Development on Rouen Road and the east side of Ber Street must respect the topography of the area.

F.4 The scale of building proposed for the site should respond to the sensitivity of smaller scale historic buildings and neighbouring residential uses and the opportunity of prominent parts of the site for greater architectural emphasis. Three broad height parameter areas are proposed for the site (number of storeys measured from the primary entrance level):

- The lowest buildings (4-5 storeys) should be positioned along the west edge of the site close to listed buildings and residential flats at the rear of Ber Street.
- A moderate scale of buildings (5-7 storeys) could be positioned: a) on the east edge of the site to emphasise the dramatic topography but with sensitivity towards the Paradise Place flats, which have their main windows and spaces on the side away from Prospect House and b) the corner of Ber Street and Thorn Lane where there is a opportunity to emphasise the street corner but a need to fit into the context of historic Ber Street and the transition of scale with the neighbouring buildings
- The highest element of the development (7-8 storeys) should be positioned at the north end of the site with its greater distance from heritage assets, the location addressing the edge of a large open space and to provide an eye-catching termination of the view along Cattle Market Street.

At this stage these parameters are indicative. When a planning application is prepared for the site the thresholds may be adjusted in response to architectural treatment, information on visual impact in relation to heritage assets and development viability.

F.5 The prominence of this site and its location within the conservation area will require a high quality architectural response.

Question 6a Do you agree with the development principles for the historic built environment (F1-5)?	Number	Percentage
Yes	11	34%
No	16	50%
No response	5	16%

Question 6b If you do not agree with the development principles for the historic built environment (E1-3) what is wrong or missing?		
Ref	Comment	Officer response
52	I strongly feel that a specific reference is required here to the prominence of the castle. The castle is arguably the most prominent building in the city,	Agree that it is important to maintain the prominence of the Castle. An annotated built heritage heat map has been added to the brief that refers to

	<p>and is immediately adjacent to this site. I believe that this development brief is missing a specific statement regarding the maximum absolute height of the development relative to the castle. All buildings in this development, and particularly those at the north end, must be substantially (eg, 5m) below the absolute height of the castle, to maintain its prominence over the city centre. I am very concerned that an unspecific statement of "7-8 storeys" could allow scope for a building to approach the prominence of the castle, particularly if it were built up from the highest point of the site.</p>	<p>the sensitivity of the setting of the castle and views from it. The submission of a planning application will need to demonstrate that the development does not diminish the pre-eminence of the Castle.</p>
53	<p>I do not consider a 7/8 storey building at the top of Rouen Road to be at all sympathetic with surrounding buildings. This is already an elevated site and no amount of planting would be able to hide such a monster. Can lessons please be learnt from the St Anne's Quarter abomination that dwarfs Dragon Hall and the other old buildings in the oldest street in the city.</p>	<p>Disagree. The prominent northern end of the site adjacent to Rouen Road lends itself to a bold architectural statement providing the architectural quality is very high.</p>
54	<p>This is outrageous. It cannot be the purpose of a consultation such as this to define the heights attainable when no detailed planning has been considered. The council should further be ashamed of itself in trying to bring together 5 separate points above, with sub elements, and expect consultees to only be able to say yes to all. Does not this invalidate the consultation overall?</p>	<p>It is vital that the brief sets principles for the height of future development of the site against which a planning application can be tested. Consultees were able to offer unrestricted comment in the free text areas that have been faithfully reproduced here.</p>
55	<p>Mostly. However a need for residents at Warminger Court on Thorn Lane side to still be able to enjoy view from their homes with no loss of light.</p>	<p>See comment ref 12.</p>
56	<p>It is important that the apartments in Warminger Court are not deprived of their light. Buildings close to Thorn Lane/Ber Street corner should be low</p>	<p>See comment ref 12.</p>

	rise.	
57	Ber Street and Thorn Lane building at 5 to 7 storeys too high.	Agreed. The height threshold has been reduced from the draft brief in response to the public consultation.
58	The proposed idea of up to 8 storeys will be an eyesore. We have a very high building in All Saints Green which impinges on the visual impact of the street and the council seems determined to create more high rise buildings in inappropriate areas.	See comment ref 53. The council regards Pablo Fanque House as a good piece of design. However it does not set a precedent because the context is different to Prospect House.
59	F 1,2,3 and the first paragraph of F4 are fine but are contradicted by the proposed building heights that follow.	The built heritage assessment heat map that has been added to the brief explains the logical connection between F1-3 and F4.
60	Former site of St Michael at Thorn should be a public open space	This would not be a successful area for a public space being close to traffic and a car park entrance. The corner needs a strong building edge to complete the street with public spaces inside the development.
61	No - see 1st page. Archant's car park I thought was built on top of St Michael at Thorn Church ruins resulting from the Badekar Raids during the 2nd world war. Was there a churchyard? Are the remaining ruins under this car park? Should there be an archaeological dig before work commences?	Archant's car park is in the location of the demolished ruins of St Michael at Thorn Church. There would need to be an archaeological dig before work commences.
62	The height of the proposed development is inappropriate. An unfortunate precedent has been set by the development opposite John Lewis.	See comment 58 and 59.
63	Prospect House itself is a historic building and should be preserved and protected. To remove this landmark takes away from the surrounding buildings rather than enhancing them.	See comment ref 4.
64	Prospect house should be listed then you wouldn't be able to demolish it.	See comment ref 4
65	5-7 storey buildings on corner of Ber Street and Thorn Lane totally	See comment ref 57.

	unacceptable, far too high.	
66	Cast iron guarantee that Paradise Place will not be overlooked, the existing trees will not be removed, and noise reduction measures will be in place.	The windows in the Paradise Place development that face the site are secondary windows with the focus of Paradise Place being within the courtyard. The trees between Paradise Place and the development can remain and if any noise reduction measures are required by environmental health this would be imposed at planning application stage.

Question 7

A suggested illustration of a development that would meet the principles is set out in section three of the draft brief and shown on exhibition boards six and seven. What are your thoughts on this illustrative development?

Ref	Comment	Officer response
67	The building at the north end is much too tall for its location. I like the concept of the pedestrian routes through the site, but they are too paved to reflect the wooded ridge or castle mall parkland. I feel that the access road cuts the site off from the wooded ridge, rather than the development providing a gateway to it (access from a single direction would be much preferable).	See comment ref 53. The extent of vegetation shown in the illustrative scheme image should not be taken literally. If access can be achieved from Rouen Road that would be preferable but it may not be possible to have only one access point so the possibility of a secondary access on Thorn Lane is retained.
68	I consider the scale - height - of the proposed buildings to lack any consideration of the surrounding area. Perhaps a competition should be held for the top of Rouen Road to ensure we all get a building we can be truly proud of rather than another rabbit hutch development like St Anne's Quarter where financial gain has clearly taken over from anything that might resemble architecture! I question whether the infrastructure can cope with this scale of development. Traffic, GP surgeries, schools etc.	The new built heritage assessment heat map explains why the proposed height thresholds are compatible with the surrounding area. In addition there has been a reduction on height in some areas from the draft brief. The idea of an architectural competition is a good one and this tool is now endorsed (though not required) in the brief. CIL payments would enable new infrastructure to be provided.
69	It can be higher. More flats overlooking the castle would be better. The levels at the low end of the site aren't fully exploited. The trees as shown could	Higher buildings would damage the setting of sensitive heritage assets and residential amenity. The bench and

	<p>accommodate at least three more levels. The bench on Golden Ball Street has been used by drug users and should be built over. This is not an important green space given the rest of the site design.</p> <p>My main concern would be the loss of the present Prospect House as a historic building. The facade with its Bernard Meadows sculpture is a major contribution to Norwich city centre. The front part of the building should be retained and more modern building added to the rear in a sympathetic fashion.</p>	<p>surrounding area would be redesigned to reduce the likelihood of anti-social behaviour resulting from concealed spaces. See comment 4 on Prospect House.</p>
70	<p>I like the idea of a new street being created. It makes sense for it to cross Thorn Lane and be ready to continue through the middle of Rouen Road car park when it is converted to housing. Furthermore the corner of that site could be a turning head for closing off Rouen Road to through traffic.</p>	<p>The new street would assist the pedestrian connection to future buildings on the Rouen Road car park site. There is no plan to close of Rouen Road to through traffic.</p>
71	<p>Please respect residents at Warmingier Court. Our homes in later stages of life!</p>	<p>See comment ref 12.</p>
72	<p>I think this development could be very attractive and an asset to the city. It is important that when it is developed low maintenance is considered as we have enough areas of the city now that are not well maintained.</p>	<p>Noted.</p>
73	<p>Very overcrowded from aerial view.</p>	<p>The aerial view is not one that anyone would experience in reality. It is the ground level experience that matters.</p>
74	<p>Too high for this prominent position.</p>	<p>The topography of the site and its surrounds deserves to be emphasised and celebrated through substantial buildings.</p>
75	<p>Gateway Square should be at the top of Thorn Lane.</p>	<p>It will be within the development to avoid causing nuisance to residents of Warmingier Court.</p>
76	<p>Very concerning INDEED.</p>	<p>The reason for the concern is not explained.</p>
77	<p>The illustrative development shows that there is no architectural merit to this development. To remove a fine</p>	<p>The illustrative images in the draft brief were intended to help visualise the layout and massing of buildings</p>

	example of Brutalist architecture and replace it with this anodyne collection of buildings would be a travesty and a shameful disservice to Norwich.	rather than be interpreted as proposed architectural treatments. They have been removed from the final brief.
78	The design will be dated in 3 years.	See comment ref 77.
79	The frontage facing the castle should be no higher than the existing building. Open areas are good but look small on the illustration and often seem to be sacrificed when final plans are submitted.	See comment ref 53. The policies relating to landscape will ensure that the open areas will not be sacrificed.
80	This very much depends on the actual finished look. These initially look tall and as at the Carrow Rd flats the finish could be disastrous and look cheap or could enhance the area. You are, of course, in the hands of the developers who will cite costs if you try to get a more harmonious finish - looking up Farmers Avenue is a vital view point and the outside finish should reflect the use of flint etc in the historic architecture.	Noted.
81	I agree with redeveloping the area, but I think local residents' opinions should be valued, we bought our retirement property because of the location and lovely views of the city and castle, we do not want 5 or 6 storey building a few feet in front of our windows blocking out light and our views. There is no need for any more retail units in Norwich there are plenty of empty units.	See comment ref 12. Shops will not be provided if there is no market demand.
82	As a considerable development of St Anne's is currently in process, where is the demand for housing coming from. If additional city residents, where is the infrastructure, work, doctors, schooling being provided.	There remains a significant unmet demand for housing as shown by the Strategic Housing Market Assessment and the length of the council's housing waiting list. CIL will provide money to pay for additional infrastructure.
83	Appropriate use of space.	Noted.
84	Ok.	Noted.
85	Yes pleasing to the eye.	Noted.

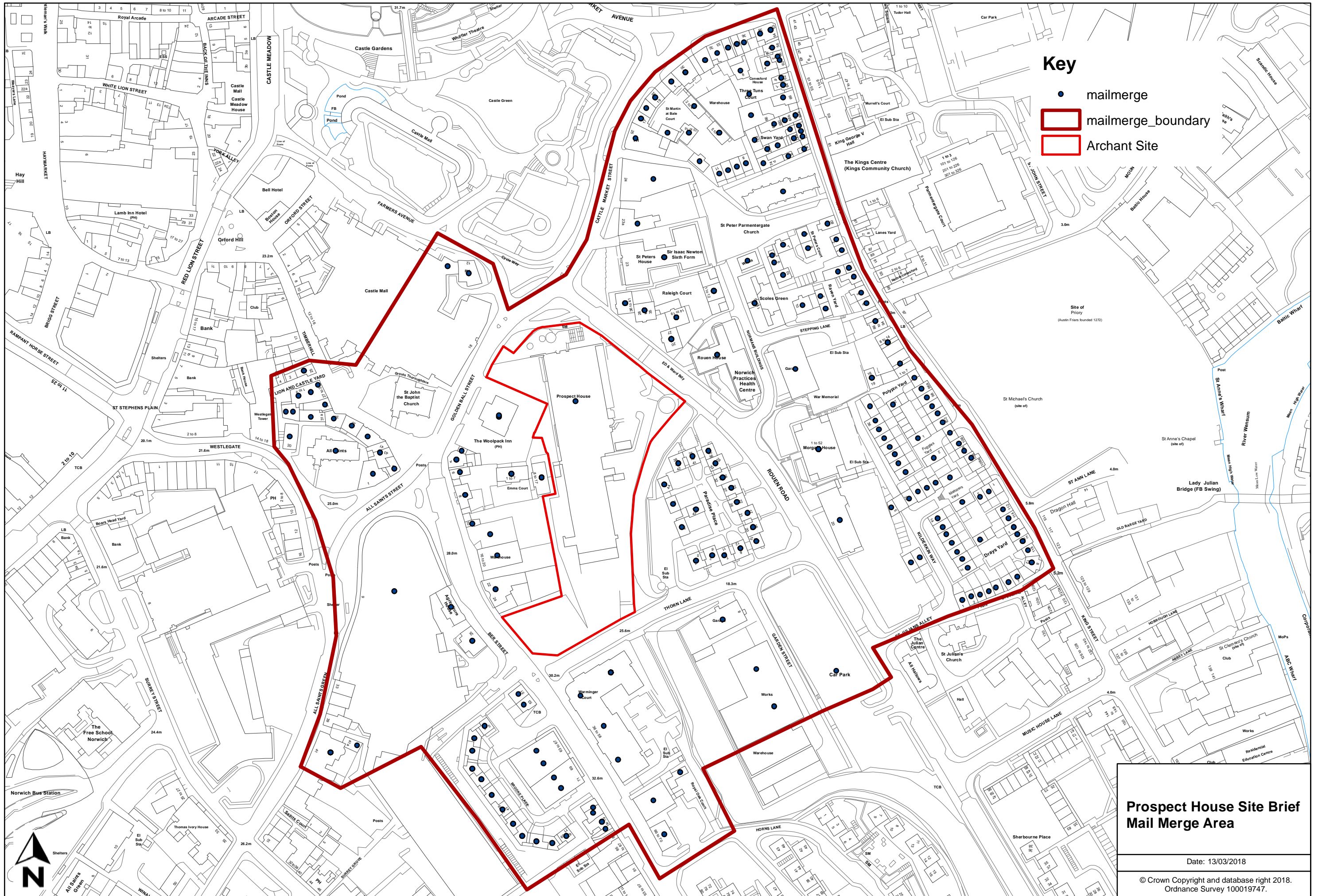
86	It's an impression. Whatever the planners say, it will be amended by the developers to maximise their profits, at the cost of local people. The Councillors will wring their hands and say "Oh we need the housing".	The development brief is being produced to ensure this does not happen. Councillors are concerned about design quality as well as housing.
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Question 8
Do you have any other comments on the draft development brief?

Ref	Comment	Officer response
87	A good start, but missing key points about the absolute height relative to the adjacent historic castle, and about the nature of the green walkways needed to merge with the wooded ridge.	The level of impact of the development on the castle would be a combination of height, distance and bulk. The built heritage heat map has taken this relationship into account. The height thresholds set by the brief are subject to further testing at planning application stage. Similarly a planning application submission would include more detail about the nature of the green walkway within the development. The brief is establishing the basic principles of the development.
88	I do believe the area does need to be tidied up and I accept housing is much needed as are open spaces. The pathways through the site will open up the area too which is a good thing. However I don't think full consideration has been given to residents along King Street who have to exit the city via Rouen Road (and a tortuous route along Ber Street to then go out to the ring road or towards St Stephens) or travelling towards the football ground. Turning right at this last junction is a nightmare and Rouen Road looks as if it might go the same way. Opening the top of Thorn Lane could ease congestion considerably and allow vehicles to exit the city more quickly thus producing less pollution. I question that existing infrastructure will cope with the increase in population in the area. I, and my neighbours, are strongly against a building of 7/8 storeys at the top of Rouen Road. We feel this will be another blot on our	See comment ref 11 and 19 on traffic. See comment ref 53 on building height at the northern end of the site.

	landscape similar to the scale of St Anne's Quarter on the surrounding buildings.	
89	The council has to get this site right. It's important to the city, it's a landmark location. ECN should be encouraged to stay.	Agreed.
90	You have every reason to be proud of this design brief.	Thank you.
91	Maintaining the ridge sounds good in theory but as a resident of Warming Court, I know what a mess the area is to the east of our development. Its future should be considered at the same time including, if necessary, closing it to the public.	See comment ref 43.
92	Need plenty of CCTV cameras. Access needed on Thorn Lane for ambulances, fire engines, taxis and carer's vehicles to park.	Cameras could be provided within the open spaces if this is considered necessary to discourage anti-social activity. However, a better solution would be to design spaces with active surveillance to discourage crime and anti-social behaviour. Essential access would be retained.
93	Access for building contractors and residents both need to be considered. Rouen Road is currently struggling to allow cars to exit the road and if additional traffic is caused or traffic is obstructed from building work, this will not have a good impact on the local area.	See comment ref 11.
94	Have a monument to free speech in the central square.	Noted.
95	No it's very informative.	Noted.
96	I object strongly to the draft development brief.	Noted.
97	The Bernard Meadows sculpture has been a significant feature in this part of the city for many years, please can it be incorporated in at least as prominent a manner in any new development.	Yes, especially because the sculpture is now a listed building.

98	<p>The basic ideas are very sound - unfortunately as I have just mentioned- you are in the hands of developers who will always cite cost as a brake on any really suitable development. Reflecting the flint and stone of the surrounding buildings - in the way that the Castle Mall outside wall does would help. The look of the Riverside / Carrow Rd development is surely to be avoided. However I appreciate that the EDP building is pretty awful - we have just got used to it!</p>	Noted.
99	<p>I agree it is only a draft, and eventually there may be plans drawn up and then would like to be consulted again.</p>	Noted.
100	<p>Yes. I have visited Sentinel House and was appalled that such an awful redevelopment was approved. The internal corridors are narrow and flightless certainly inaccessible for wheelchairs. The apartments have borrowed light in most bedrooms. The air circulation system will have to be on all the time to provide air. The main living rooms are all kitchen/lounge/diners some less than 12 feet square. How can people be expected to live in these little rabbit hutches. PLEASE ENSURE THIS DEVELOPMENT HAS ADEQUATE MINIMUM ROOM SIZES.</p>	<p>Sentinel House was converted under permitted development rules that prevent the local planning authority regulating room sizes or layout.</p>
101	<p>Please factor in people who live outside the city who might want to drive in to visit and see the historic places - think about parking - park and ride does not do the job. Park and ride is too expensive for children of Norwich.</p>	<p>Comment outside the scope of this consultation.</p>
102	<p>It's a wonderful idea, but not fully thought out. What actual control will the Council and the Planners have once the site is cleared and building is promised but "Needs amending in the light of current financial and market constraints"?</p>	<p>The local planning authority will have sufficient control through any subsequent planning application to ensure that the development is of a good quality.</p>



Key

- mailmerge
- ▭ mailmerge_boundary
- ▭ Archant Site

**Prospect House Site Brief
Mail Merge Area**

Date: 13/03/2018

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Historic England

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Mr Ben Webster
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Direct Dial: 01223 582721

Our ref: PL00470882

13 August 2018

Dear Mr Webster

**Prospect House site, Rouen Road/Thorn Lane/Cattle Market Street,
Norwich, Norfolk
Draft development brief for redevelopment of site**

Thank you for consulting Historic England on the development brief for the Prospect House site off Rouen Road, Norwich. We appreciate the opportunity to comment on the development proposals and the impact they might have on the historic significance of the conservation area and nearby listed buildings at an early stage in the project.

The site stands on rising ground within the walled medieval city of Norwich in the area between King Street and Ber Street, two important streets which formerly lead to gates in the city walls. Until the later 18th and early 19th centuries this area was characterised by scattered low-density development with several sizeable open spaces. In the later 19th century this area was developed with terraces of houses in-filling much of the open space and some more substantial industrial premises.

During the later 20th century the area was dramatically transformed with wholesale clearance of Victorian and earlier building and changes to the historic street pattern. Scoles' Green, Rising Sun Lane and Globe Lane were all removed and Cattle Market Street widened, all with the loss of historic buildings around them. Rouen Road was also created and modern office buildings were constructed around its northern end which are entirely out of scale with historic development, particularly in height where they often exceed the height and bulk of even the Victorian factories. Prospect House is one of these buildings. Further south along Rouen Road the new building is less dense and smaller in scale, more in keeping with the general character of the historic area. The Paradise Place development is an example of this.

On Ber Street itself historic development was more dense, reflecting the value of property fronting this major route. There has also been a significant amount of demolition and replacement building on Ber Street where it joins the western side of the Prospect House site but the pattern of property boundaries can still be seen. There are a number of historic buildings on Ber Street and Golden Ball Street where they follow the northern and western sides of the site along with modern building of a similar scale, if not form. At the junction of Ber Street and Thorn Lane, an historic



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street which marks the southern edge of the site, is a car part on the site of St Michael at Thorn church.

Prospect House itself is a large modern office building, a single block of building larger than even most of the modern office buildings at the northern end of Rouen Road and far exceeding any historic building surviving or removed in this part of the conservation area. For this reason it is identified as a negative building in the conservation area character appraisal, as is the smaller Rouen House on the other side of Rouen Road. However, it is not without architectural interest in its own right and so has been recently considered for statutory designation by Historic England's listing team.

During this process the sculpture by Bernard Meadows which stands at the Cattle Market Street entrance to Prospect House has been considered as part of the building. Section 2.6.10 of the Development Brief proposes the retention of this sculpture. Not only is Meadows' sculpture an important work of art but it appears to have been considered with reference to its location, which contributes to its interest. Furthermore, the entrance steps to Prospect House act as a large 'plinth' upon which the sculpture is raised. These have a curved, angled form and are faced in flint. The use of the local vernacular building material for this plinth (unlike the concrete of the building) and the curved form appear to be direct references to the sculpture's setting in the historic city and even to military architecture, perhaps suggesting a bastion, ravelin or similar outwork and thus referring to Norwich Castle. This design should be given careful consideration and the sculpture not only retained but the entrance 'plinth' on which it sits brought into designs for new development.

Turning to the setting of the Prospect House site and the impact upon it of the proposed building the Development Brief (2.11.1) refers to a built heritage assessment having been produced and used to inform the brief. We have not seen this assessment. Also there does not appear to have been any visual impact assessment and the images of proposed of the new building in the brief are not scale elevations or sections through the site showing neighbouring buildings. Although storey heights are mentioned in the design principles and multi storey buildings are shown in the sketch views there is no storey height plan included. It is therefore unclear what level of understanding of the historic environment has informed drafting of the Brief and on what basis the impact of buildings of the heights proposed has been assessed and considered appropriate.

It is therefore difficult for us to fully assess the impact of the proposed development on the conservation area and nearby listed buildings or understand the basis on which the Development Brief has been produced in terms of the historic environment. We would very much like to see this documentation before giving a definitive view of the impact of the proposed development.

However, on the basis of the information available we would accept the principle of a mixed use development for the site with general market housing and possibly commercial and retail space. Given the context of the site on the south and eastern sides new building designed in a contemporary style would also seem appropriate and there is potential for structures of some size and height. New building at the northern end of the site has the potential to be viable in context of a number of individual heritage assets as well as sensitive parts of the conservation area. The new building on Ber Street also raises issues for the conservation area as well as buried archaeology.

Before considering the design of any new building on the Ber Street car park part of the site it should be stressed that this is the site of the medieval parish church of St Michael at Thorn. There does not appear to be any reference to the archaeological potential of this site in the Development Principles and the need for the capacity of the site for any new building to be informed by accurate assessment of this at an early stage.

If this issue is satisfactorily addressed Development Principle F4 refers to the Ber Street site as a corner plot on Thorn Lane which could be emphasised architecturally. This may be the case, but we consider that a seven storey building could be excessive in this location. The building shown on the proposed aerial view sketch is also a deep, bulky, single mass of building out of scale with any building on this side of Ber Street. This block might 'reinststate a strong building line on Ber Street' (Development Principle F2) but does not seem to 'respond to the sensitivity of smaller scale historic buildings' (Development Principle F4). At five stories maximum, with a fine grain of building and elements descending the hillside Warminger Court on the opposite corner of Thorn Lane seems a more appropriate response to the setting in scale and massing, if not necessarily in design detail. Following archaeological assessment we would suggest the form and scale of new building on the car park site should be thoroughly reconsidered with reference to the historic environment as required by the Development Brief's Principle F4.

Turning to the larger part of the development site the Development Brief (2.11.5) notes that the conservation area character appraisal considers Prospect House a negative feature in the area because it is 'out of scale with the remaining historic development in the area.' The illustrations in the Brief suggest that new building would comprise blocks of smaller footprint than Prospect House. This could avoid the single bulk of that building, although the blocks along Rouen Road and beside a Paradise Place appear very close together. The street level sketch of Rouen Road/Paradise Place shows very little of the new buildings but the aerial view does suggest they might appear more as a single line of building. Without elevations it is difficult to assess this effect, but there is certainly potential for new build to address Rouen Road and perhaps to be built to the height of the modern buildings before stepping down to better respond to the scale of Paradise Place.

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Development Principle F4 suggests that eight storey buildings might best be situated at the northern end of the site because of their 'greater distance from heritage assets'. These are presumably the blocks facing Rouen Road and Golden Ball Street. It is not clear which heritage assets have been considered to be at sufficient distance to not be affected by buildings of this height, but several individual buildings are close enough to be visually affected and the site itself is inside a designated heritage asset, the conservation area.

It should be considered how such tall buildings would appear in views from Golden Ball Street alongside and potentially above existing buildings which make a positive contribution to the conservation area including the Woolpack public house and number 4 Ber Street. The top of the four storey Prospect House can be seen almost at the roof top level of the Woolpack so it is very likely an eight storey structure will be far more prominent. The churchyard of St George Timberhill, a grade II* listed medieval building, is elevated above the level of Golden Ball Street making it likely that a new tall building would be even more prominent in views from it. Responding to the sensitivity of smaller scale historic buildings is Development Principle F4. This should be a key objective on Golden Ball Street, All Saints Street and Timberhill just as on Ber Street but we are uncertain if this will be achieved with new buildings of the height proposed in the northern end of the development site.

Another heritage asset potentially affected by buildings of seven or eight storeys at the northern end of the development site is Norwich Castle. This is referred to in the Development Brief, but chiefly in terms of long distance views of it in which the proposed new buildings might feature. However, Cattle Market Street and Golden Ball Street mark the extent of the castle bailey and views from the southern side of castle gardens are significant, as are those from the castle mound and keep. The impact of significantly taller buildings in views from these parts of the castle and the wider castle complex should therefore be carefully considered. The sketch view from Farmers' Avenue does not help in assessing this impact and in fact suggests the new buildings would be little higher than the existing trees even though Prospect House is of a similar height when seen from a similar viewpoint. We would therefore suggest that buildings of eight stories in height would actually be larger than the sketch suggests and recommend more accurate assessment is carried out before the principle of buildings of this height is taken forward in the Brief.

In summary, while the Prospect House site has considerable potential for development, especially on the eastern and southern sides towards Rouen Road and Paradise Place, the conservation area and setting of listed buildings on the western and northern sides could place considerable constraints on the form and scale of new building.

We are concerned that new building on the site of St Michael at Thorn church may have been proposed not only without consideration of its archaeological sensitivity but

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that the height and bulk of the proposed building illustrated in sketches would not achieve the aims of the Development Brief's own Design Principle F4 of responding to the sensitivity of smaller scale historic buildings and the character of this part of the conservation area. It should therefore be reconsidered before the Brief is taken forward.

It is more difficult to accurately assess the impact on the historic environment of other parts of the proposed development. At the northern end of the site, where the Bernard Meadows sculpture and its flint 'plinth' could be retained as part of the new development new buildings up to eight stories in height have the potential for negative impact on Golden Ball Street and Timberhill as well as Ber Street and potentially the setting of Norwich Castle. Further assessment of this should be carried out, but we are concerned that building of this height might not be suitable in this location and feel the maximum height of these buildings should be reduced before the Brief is taken forward.

As noted above we would welcome the chance to see the built heritage assessment which was produced to inform the Development Brief and recommend that visual impact assessment of buildings of the proposed heights should be carried out at an early stage. Development Principle F4 states that when a planning application is prepared 'thresholds' (presumably including massing and height) could be adjusted in response to information on the visual impact on heritage assets. We are concerned that this should be done well before that stage and that there is at present insufficient information on which to accept principles of height and massing of new building across much of the site.

We hope this advice is helpful. We would very much welcome receiving a copy of the built heritage assessment and any other visual or design assessment which has been carried out following which we would like to advise the Council further but please do not hesitate to get in touch should you wish to discuss the matter at this stage.

Yours sincerely,



David Eve
Inspector of Historic Buildings and Areas
david.eve@HistoricEngland.org.uk

- Edinburgh
- Glasgow
- Manchester

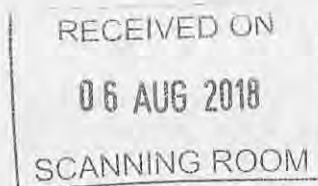


CB/HH/AMU

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02 August 2018

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Dear Sir/Madam,

**PROSPECT HOUSE SITE DEVELOPMENT BRIEF
REPRESENTATIONS ON BEHALF OF JOHN LEWIS PARTNERSHIP**

On behalf of John Lewis Partnership (JLP), we submit representations to the public consultation draft version of the Prospect House Site (the "Site") Development Brief, and wish to take this opportunity to register our client's interest in the on-going preparation of the Development Brief.

The John Lewis Department Store is located within the Town Centre on All Saints Green. The Store is a key anchor in the Town Centre and a significant contributor to its retailing offer and overall vitality and viability. Part of the shop's frontage, as well as the customer car park entrance and the entrance to the "Click and Collect" facility front on to Ber Street, which forms part of the western boundary of the Development Brief area. The entrance to the Store customer car park is located immediately opposite the existing Prospect House car park.

In terms of proposed uses, the draft development principles for the Site include retail, providing it is well located to the existing primary retail area, such as at ground floor level along Ber Street. The draft development principles also include provision for replacement, high-grade office space, ideally in a prominent location such as the Golden Ball Street or the junction of Ber Street and Thorn Lane. This latter option would sit directly opposite the entrance to the John Lewis customer car park and close to the customer collection area.

As well as providing improved connectivity though the Site, the Development Brief also seeks to reinstate a strong building line along Ber Street. In terms of building height, it is anticipated that the lower building heights will be on the western Ber Street frontage, with a height of 4-5 stories. It is noted that the existing buildings along this frontage currently range between 1-3 stories.

Overall JLP is supportive of the draft Development Plan for the Site. The proposals will help to rejuvenate this part of the City and make it more attractive for shoppers and visitors to the Town Centre generally. In particular, the plans to open up the Site to improve connectivity to Ber Street are welcomed. However, there are concerns about the building height, and going forward, JLP would like to understand the height implications of the proposed buildings on Ber Street, such as the effect on sunlight to the department store.

Additional retail is also welcomed, although the scale, exact location and the type of retail proposed should be complementary to the existing retail. The provision of A3 and A5 uses should be considered carefully to ensure that these do not have an adverse effect on the area. JLP would also like to understand the potential impact on vehicle movements and pedestrian access on Ber Street, both as a result of the development, and during the construction phase.

Therefore, whilst John Lewis is supportive of the principle of the emerging Development Brief, they would like to be kept informed of its progress, along with any planning applications coming forward at the Site. We also ask that particular attention is paid to the following:

- The effect of the building height along Ber Street on the existing properties;
- The scale and type of retail uses to be provided on the site;
- The effect of on vehicle and pedestrian flows along Ber Street; and
- The effect of the constriction phase on the wider area, with particular regard to John Lewis's operations.

I trust that you are able to consider these representations in respect of the further development of the Prospect House Site Development Brief. If you do have any queries or require any further information please contact Craig Blatchford (0207 866 8607) or Harriet Humphrey (020 7312 7541).

Yours faithfully



Montagu Evans LLP