

**Report to** Planning applications committee

**Item**

9 August 2018

**Report of** Head of planning services

**Subject** Application no 18/00503/O - St Peters Methodist Church  
Park Lane, Norwich, NR2 3EQ

**4(b)**

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

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

<b>Development proposal</b>		
Outline application including matters of access, for demolition of all buildings on site, erection of up to 10 dwellings, formation of new access road from Avenue Road with associated external works.		
<b>Representations</b>		
Object	Comment	Support
16	9	1

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

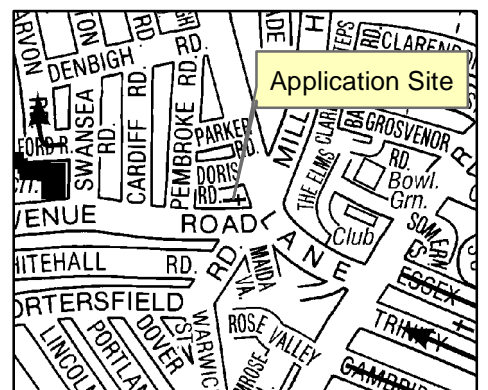


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Planning Application No 18/00503/O & 18/18/00504/O  
 Site Address St Peters Methodist Church Park Lane  
 Scale 1:1,000



**NORWICH**  
 City Council  
 PLANNING SERVICES



## The site and surroundings

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

## Constraints

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

## Relevant planning history

10.

Ref	Proposal	Decision	Date
4/1989/0886	Infill of yard area at front of church.	Approved	30/11/1989
15/01928/F	Demolition of modern extensions and conversion to provide 20 residential units (class C3).	Refused	21/07/2017
18/00504/O	Outline application including matters of access, for demolition of the Church Hall, Welcome Room and Boys Brigade, conversion of main church and erection of new dwelling(s) with associated external works.	Pending	
18/00962/F	Change of use from D1 (place of worship) to C3 (dwelling houses). Demolition of modern extensions, removal of two trees, and general redevelopment of site to provide 20 new residential units and associated landscaping and parking.	Pending	

It should be noted that the refusal of application 15/01928/F is currently the subject of an appeal, application 18/00504/O is the subject of a report elsewhere on this agenda and application 18/00962/F (a re-submission of 15/01928/F) is pending consideration.

## The proposal

11. This is an outline application with all matters reserved except for access. It is proposed to demolish all existing buildings on the site and construct up to ten new dwellings. Access would be from Avenue Road and an indicative layout shows a parking court to the west of the site and off-street parking to the front of each dwelling off Park Lane. This layout shows how eight dwellings could be provided, with a terrace of six fronting Park Lane and a pair of semi-detached dwellings to Avenue Road.

## Summary information

Proposal	Key facts
<b>Scale</b>	
Total no. of dwellings	Maximum 10, submitted indicative plans indicate 8
No. of affordable dwellings	0
Total floorspace	Up to 1000 square metres
No. of storeys	2 to 3
Density	Maximum 66 dwellings per hectare

## Representations

12. Advertised on site and in the press. Adjacent and neighbouring properties have been notified in writing. 26 letters of representation have been received citing the issues as summarised in the table below. All representations are available to view in full at by entering the application number.

Issues raised	Response
Number of units and density	See main issue 3
Not enough parking (one comment that there is too much parking proposed)	See main issue 5
Adverse visual impact of parking on street frontage	See main issue 3
No green space/play area/public amenity provided	See main issue 4
Increase in traffic and adverse impact on highway safety	See main issue 5
Strain on foul sewer and water supply	See main issue 7
Increased risk of flooding	See main issue 7
Loss of privacy, lack of light to neighbouring dwellings	See main issue 6
Poor design, out of scale and overpowering. Lack of detail.	See main issue 3
No affordable housing	See main issue 8

<b>Issues raised</b>	<b>Response</b>
Loss of community use/amenity value (reason for local listing)	See main issue 1
Church needs to be demolished/support clearance of all buildings	See main issue 2
Housing for people with disabilities	See paragraph 105
No mention of environmentally friendly design or energy efficiency	See table at paragraph 104
Loss of trees	See table at paragraph 104
Preferable to original proposals (15/01928/F). More in favour of this than 18/00504/O.	Noted. Each proposal must be considered on its own merits.

## Consultation responses

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

### Design and conservation

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

contributes to the character and appearance of the conservation area. St Peters was built alongside Boardmans Old chapel in 1939 when the remaining congregation in Lady Lane transferred to this site. The original church was refaced in the early 1960s and converted into a church hall.

17. The building was constructed in 1939, built in buff brick with brown brick canted window details and leaded lights and neo-classical proportions. The simplicity of the elevations means that it is relatively sensitive to change. The building was constructed to the designs of local architect Cecil Yelf in a simple but monumental style very evocative of its time. The building is an important community and landmark corner building. Situated on a relatively busy junction - this impressive and imposing landmark building terminates views along 5 different roads: Park Lane, Avenue Rd, Portesfield Rd, Maida Vale and Mill Hill Road. St Peters benefits from 'aesthetic, historic and social/communal' heritage value and significance to varying degrees.
18. The Sunday school/Boys Brigade building was constructed in early 20C to the design of local architect Boardman. This modest single storey building with a rectangular plan and pitched roof, constructed in Costessey gault brick and Welsh slate. The building presents an attractive and symmetrical elevation to the street with a three-centred arched entrance fronting Avenue Road and attractive timber framed fenestration and a tall chimney stack to the service alley to the rear of Avenue Rd and Doris Rd. The fenestration is plain of mullions and transoms in timber with glazing bars. The heads are of short soldier arches (headers on edge). The building has a typical modest 19C Norfolk Methodist chapel architectural style/form with classical proportions and modest character.
19. This modest building forms part of the historic chapel grouping and is indicative of the congregations expansion and use over time. The building benefits from 'aesthetic, historic and social/communal' heritage value and significance to varying degrees. The building is considered to positively contribute to the character and appearance of the conservation area. The historic dwarf wall, railings, gates, piers and caps fronting Avenue Road also contribute to the character and appearance of the conservation area.
20. When considering any planning application that affects a conservation area a local planning authority has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990).
21. The proposed loss of the historic Methodist church grouping with its ancillary buildings would be to the detriment of the character and appearance of the conservation area. It would result in the wholesale loss of a locally listed building (St Peters Church) and two ancillary buildings of heritage value and significance. These buildings form part of a significant grouping of religious buildings – which contribute to the history of the Methodist church and their development in Norwich.
22. The conservation area is characterised by a mixture of 19C residential houses with these interspersed with religious buildings and some commercial uses. Most often the non-residential uses are located on a prominent corner within the townscape. These buildings acting as local landmarks, through which people navigate their way through the townscape. St Peters Church is a prominent corner feature and local



landmark - the loss of which would result in harm to the character and appearance of the conservation area as a whole.

23. The proposed demolition would therefore result in harm to the aesthetic, historic and communal social heritage value of the conservation area as a whole, contrary to the requirements of legislation, policy and guidance.
24. The proposed terraced houses are not of particular architectural merit, exhibiting rather squat proportions upon their elevations as a result of the horizontality of the proposed fenestration with top heavy roof forms – the buildings proportions and detailing at odds with the prevailing terraced house form in the street. No front boundary treatment is provided – with parking spaces directly in front of the houses and no front garden. Again this fails to harmonise with the local character/distinctiveness. The prominent corner building (St Peters) which dramatically terminates views to 5 flanking streets would be lost, replaced with an extremely underwhelming 2 storey development.
25. In NPPF terms, the loss of these heritage assets will cause ‘less than substantial’ harm to the conservation area and therefore harm to a ‘designated heritage asset’. Harm identified is ‘*less than substantial*’, does not mean that it is inconsequential. Every effort should be made to prevent harm.
26. These proposals are therefore considered contrary to the requirements of Policy DM9 of the Local Plan and the requirements of the NPPF.
27. The proposed works are not considered to make a positive contribution to the local character and distinctiveness and would cause harm to the character and appearance of the conservation area. There does not appear to be clear and convincing justification for the proposals contrary to para 192 & 194 of the NPPF.
28. Will the works result in ‘less than substantial’ to the character and appearance of the conservation area. Paragraph 196 of the NPPF states that ‘*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*’.
29. It is questionable as to whether the applicant has demonstrated that the current proposals represent sufficient ‘public benefit’ to outweigh the significant harm caused to the character and appearance of the conservation area.

## **Historic England**

30. Summary: The applications proposes the demolition of the existing church, church hall and former Boys’ Brigade Hall on a site in the conservation area to make way for the erection of ten houses. These buildings are of historic interest and make a positive contribution to the significance of the conservation area. We would support their adaptation and reuse but would object to the demolition which would result in harm to the historic significance of the conservation area in terms of the National Planning Policy Framework.
31. Recommendation: Historic England objections to the application on heritage grounds. We consider that the application does not meet the requirements of the NPPF (2012), in particular paragraph numbers 6, 7, 14, 132 and 134. In determining this application you should bear in mind the statutory duty of section



72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account in determining the application.

### **Environmental protection**

32. No comments.

### **Highways (local)**

33. No objection on highway grounds.

34. A Construction management plan will be required to deal with demolition and construction traffic. I cannot see reference to bin and bike storage, please can this be queried. We don't want bins left on the footway, or bikes insecure.

35. Due to construction traffic it is likely footways will need to be reconstructed, we can assess the necessity of this work at a later stage, but we need it confirmed in the decision notice if approved. This will also enable them to be strengthened to withstand vehicle crossover use.

36. New dropped kerbs will be required on Avenue Road.

37. Extant waiting restrictions are adequate to control parking in the vicinity and do not require amendment.

38. Informatives: The new dwellings will not have parking permit entitlement and will need to have all parking provision on site that they require.

### **Landscape and Ecology**

39. Demolition of the landmark building which terminates the view westwards along Park Lane would be a significant loss to the streetscape within the Heigham Grove conservation area.

40. 2 prominent street trees (Lawson Cypress), which represent the largest trees along this section of Avenue Road, are in good condition with 20+ year life expectancy, are protected by the conservation area status and make a significant contribution to the street scene in an area where there are fewer street trees. The removal of these trees is unlikely to be compensated for by the proposed replacement tree planting as the space available is insufficient to allow trees to grow to any stature. There is enough space in the proposed layout for one relatively small tree on the corner.

41. Whilst the existing apron around the buildings on the Park Lane frontage is an unattractive area of asphalt, this is out of character with Park Lane and other local streets which typically feature boundary walls and hedges. Redevelopment of this site should take the opportunity to address this issue.

42. The existing low wall topped with railings together with capped brick gate piers along the Avenue Road frontage are attractive features. This boundary should be retained as far as possible and any new boundary treatment should match the existing as closely as possible.

43. External amenity space for residents is limited.
44. Bat Survey and Assessment 2018 update submitted. An updated survey was undertaken in March 2018. The Church building is considered to support roosting bats. Demolition of this building would result in the complete loss of all identified bat roosting areas. This means that a Licence from Natural England would be required. An alternative roosting provision will be required in one of the roof voids of the proposed properties. Proposed mitigation measures for bats outlined in the above report should be implemented. Ecological enhancement measures should be provided. Dependant on timing of construction works, there is a possibility that further surveys for bats may be required. This should be covered by either an EPS licence or registration under a Class Licence.
45. If trees are removed this should be undertaken outside the bird nesting season.

#### **Norfolk historic environment service**

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

#### **Norwich Society**

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

#### **Tree protection officer**

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

#### **Citywide Services**

51. The developers must ensure the collection point on the plans must be able to accommodate all 10 wheelie bins without them overflowing onto the highway and that this area is not to be used to store the bins, they must only be there for the day

of collection and pulled back into the individual properties for the remainder of the week.

### **Anglian Water**

52. The foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have capacity for these flows. The sewerage system at present has available capacity for these flows.
53. The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. No evidence has been provided to show that the surface water hierarchy has been followed as stipulated in Building Regulations Part H. This encompasses the trial pit logs from the infiltration tests and the investigations in to discharging to a watercourse. If these methods are deemed to be unfeasible for the site, we require confirmation of the intended manhole connection point and discharge rate proposed before a connection to the public surface water sewer is permitted. We would therefore recommend that the applicant needs to consult with Anglian Water and the Environment Agency.
54. We request that the agreed strategy is reflected in the planning approval. Condition recommended requiring submission and agreement of a surface water management strategy.

### **Local Lead Flood Authority**

55. Initial response (14 June 2018):

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

- National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) has not been followed to show how the most vulnerable elements of the development has been placed in areas of lowest flood risk on the site
- The development changing vulnerability categories from less (a community building) to More Vulnerable (Housing) is at risk of flooding from surface water with no evacuation / emergency plan provided.
- As the drainage scheme is located within an area at risk of flooding, it is not clear how the drainage scheme proposed will only take on site runoff and be designed with a surcharge outfall to operate as suggested during the design flood event and not be overwhelmed from water from offsite.
- There is only one proposal for the discharge of surface water from this site but Anglian Water have not suggested this is acceptable in principal, what the current discharge rate from the site is and how the development is not increasing flood risk elsewhere.
- The lack of outline management and maintenance plan

#### **Reason**

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

increase the flood risk elsewhere and surface water drainage system operates as designed for the lifetime of the development.

56. This response identified that the LLFA would consider reviewing their objection if a number of issues are adequately addressed. Additional information was subsequently received and the LLFA were reconsulted.

57. Their revised response advises:

We maintain our objection to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) / Drainage Strategy and our comments in our letter 14 June (FWP18/4/6416) still stand.

We have reviewed the letter from Richard Jackson Engineering dated 4 July 2018. This contains no further technical information for us to review. We note that the letter contains an argument for conditioning all the outstanding information. We do not feel this is appropriate at this time as the information we request is likely to influence the number and arrangement and character of dwellings achievable at this location.

Regarding the drainage runoff rates, we acknowledged that we agreed rates in 2016 on a separate application but we now request that these rates are Greenfield or as close to. This is considering the location in the Critical Drainage Catchment, Norwich City Council Policy DM5 and updated Anglian Water Protocol on redevelopment. As the rates proposed are brownfield and we are yet to agree a runoff rate and volume associated we do not suggest that a condition is set.

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

## **Emergency Planning**

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

## **Assessment of planning considerations**

### **Relevant development plan policies**

59. **Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS)**

- JCS1 Addressing climate change and protecting environmental assets
- JCS2 Promoting good design
- JCS3 Energy and water
- JCS4 Housing delivery
- JCS6 Access and transportation
- JCS7 Supporting communities

- JCS12 The remainder of the Norwich urban area including the fringe parishes
- JCS20 Implementation

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

- DM1 Achieving and delivering sustainable development
- DM2 Ensuring satisfactory living and working conditions
- DM3 Delivering high quality design
- DM4 Providing for renewable and low carbon energy
- DM5 Planning effectively for flood resilience
- DM6 Protecting and enhancing the natural environment
- DM7 Trees and development
- DM9 Safeguarding Norwich's heritage
- DM10 Supporting the delivery of communications infrastructure
- DM11 Protecting against environmental hazards
- DM12 Ensuring well-planned housing development
- DM22 Planning for and safeguarding community facilities
- DM28 Encouraging sustainable travel
- DM30 Access and highway safety
- DM31 Car parking and servicing
- DM32 Encouraging car free and low car housing
- DM33 Planning obligations and development viability

**Other material considerations**

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

- NPPF2 Achieving sustainable development
- NPPF5 Delivering a sufficient supply of homes
- NPPF8 Promoting healthy and safe communities
- NPPF9 Promoting sustainable transport
- NPPF12 Achieving well-designed places
- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF15 Conserving and enhancing the natural environment
- NPPF16 Conserving and enhancing the historic environment

**62. Planning Practice Guidance**

**63. Supplementary Planning Documents (SPD)**

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

**Case Assessment**

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

detailed above and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.

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

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

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

66. Key policies and NPPF paragraphs – DM12, Revised NPPF paragraphs 59 and 11
67. Paragraph 59 of the Revised NPPF identifies the importance of a sufficient amount and variety of land coming forward where it is needed to significantly boost the supply of housing and policies JCS4 and DM12 support new housing which will help to meet housing needs in the city. The site is located within an established residential area, with regular bus services located nearby. Future residents would be well supported by a wide range of local services and facilities available in the adjacent Unthank Road local centre and in the city centre which is within walking distance of the site.
68. None of the exception criteria of Policy DM12 apply and new residential development at the site is therefore acceptable in principle, subject to other material planning considerations and policies discussed below.

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

69. Key policies and NPPF paragraphs – DM22 and Revised NPPF paragraph 92.
70. Following a decline in congregation numbers to the 30s, services at the Church ceased in December 2013 and the congregation was merged with that at Jessop Road United Road Reform Church. A regular congregation of around 200 and significant investment would be required to bring the church back into use and sustain it. The merged site at Jessop Road and another Methodist church at Chapelfield Road are both around 1km from the site and offer alternative provision.
71. An extensive marketing campaign for what is considered a 'meaningful period' in compliance with Policy DM22 was undertaken for the premises as a church/community hall with potential for a range of alternative uses. This did not attract interest for a church or community use and the lack of interest was attributed

to the costs of necessary repairs and ongoing maintenance commitments which would likely make a community use unaffordable.

72. This matter was considered extensively with application 15/01928/F and the circumstances have not changed. It is considered that the loss of the community use has been sufficiently justified with regards the requirements of Policy DM22.

### **Main issue 2: Heritage**

73. Key policies and NPPF paragraphs – DM9, Revised NPPF paragraphs 189-202.
74. The site is located within the Heigham Grove Conservation Area, a designated heritage asset, which is characterised by predominantly residential detached and terraced dwellings interspersed with prominent religious buildings, including the Catholic Cathedral of St John the Baptist, and other commercial buildings such as public houses, generally on prominent corner sites. The suburban character of the area is indicative of the nineteenth and twentieth century expansion of Norwich.
75. The group of religious buildings that comprises the application site date from the late nineteenth and early twentieth centuries (with later twenty-first century additions and alterations) and sit at a prominent road junction surrounded by residential development of the same period. The site is therefore typical of and positively contributes to the form of development that characterises the Conservation Area.
76. Of the three buildings, the main church is the most prominent by virtue of its scale, position and monumental architectural style. It is locally listed and therefore a non-designated heritage asset. The listing cites its importance as a community and landmark building, evocative of its time. Some representations have suggested that if it is no longer in community use, the reasons for its local listing no longer apply and its retention is not justified. However, when assessed for local listing, a building must satisfy a number of criteria which, along with community importance, include townscape, architectural and historical values. St Peters Methodist Church is of more than just community value, as confirmed by the local listing description, and its significance as a heritage asset is also in its aesthetic and historic values. Its monumental style is evocative of its construction in the 1930s and it has neo-classical proportions with simple elevations. It also has an association with local architect Cecil Yelf (a senior partner of Edward Boardman and Son who had associations with the Methodist church) and features stained glass thought to be by renowned glass painter Francis Skeat. Some representations have supported the demolition of the church and the Norwich Society would not object to its removal from the local list and demolition if it achieved a better architectural solution for the site.
77. The original church building, which has subsequently been used as the church hall, and the Boys' Brigade building are not individually locally listed; however, the church hall is the original building of this group and the Boy's Brigade was a subsequent addition marking the expansion of the congregation and use of the site. Whilst the church hall was re-faced and renovated in the 1960s, it retains a strong visual presence and the original gault brick gable end is evident at the rear. It has historic significance as a result of its association with the development of the Methodist church and design by local architect Edward Boardman. The 1960s alterations have reduced its aesthetic significance and architectural integrity,



however the large massing and form, which echo the strong gable end of the later church, make a positive contribution to the character of the Conservation Area and form part of a familiar local scene.

78. The Boys' Brigade building is the smallest of those on the site in plan and height and its modest architectural scale and form with classical proportions is typical of nineteenth century Norfolk Methodist chapels. It has aesthetic, historic and social communal significance and is considered to positively contribute to the character and appearance of the Conservation Area. The dwarf walls and railings on the Avenue Road frontage also make a positive contribution.
79. A structural assessment undertaken in support of the previous conversion scheme found the buildings were capable of conversion and, although the porches to the both the main church and Boys' Brigade buildings have suffered from some localised subsidence, it has not been suggested nor demonstrated that it is not viable to retain the buildings. Their demolition is proposed in order to redevelop the site with new build housing that responds to objections to the previous conversion scheme in respect of density, massing, amenity space, flood risk, daylight and sunlight, bin and cycle storage and parking. No heritage assessment has been submitted with the application and the loss of the locally listed building and impact on the Conservation Area has not been justified. It is proposed to preserve a historical record of the site and conserve, re-site or re-home key artefacts where practical and appropriate. Retaining 'St Peters' as part of the name of any development is also proposed.
80. The existing buildings on site, individually and as a group, have heritage value and make a positive contribution to the character and appearance of the Conservation Area. The proposal would result in the wholesale loss of a locally listed building and two ancillary buildings of heritage value. Together, these buildings form a significant grouping of religious buildings which contribute to the history of the Methodist church and its development in Norwich. They also form a landmark at a prominent corner site which is typical of and positively contributes to the character and appearance of the Conservation Area. They be lost in their entirety as a result of the proposal.
81. The Revised NPPF sets out that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and Policy DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets and only allow harm to or the loss of locally identified heritage assets in certain circumstances. The Revised NPPF requires harm to or loss of significance of designated heritage assets to be justified and the degree of any harm or loss must be assessed. Whether the potential harm to significance of a designated heritage asset is substantial, total loss of less than substantial harm, paragraph 193 requires that great weight should be given to the conservation of the asset. Furthermore, in accordance with the *Planning (Listed Buildings and Conservation Areas) Act 1990* there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
82. In this case it is considered that the loss of this group of buildings which positively contributes to the character and appearance of the Conservation Area would harm that designated heritage asset and that harm has not been justified in the

application. In terms of the degree of harm, it is considered to be less than substantial and the Revised NPPF requires that less than substantial harm is weighed against the public benefits of the proposal. The applicant has not sought to demonstrate what these public benefits may be, however it can be considered that the loss of the buildings would facilitate redevelopment of the site to provide up to ten dwellings to contribute towards local housing need. As this is an outline proposal, the contribution that any new development on the site would make to the character and appearance of the Conservation Area can neither be assessed nor secured in the determination of this application. Therefore whilst it may result in housing delivery and offers an opportunity to address some of the existing amenity and flooding issues experienced on and around the site, there is no certainty that this would be successful in doing so or make an equal or greater contribution to the Conservation Area to compensate for the loss of the existing buildings. Indeed the indicative layout and elevations suggest it may be of further detriment. Furthermore, the interpretation and conservation measures proposed do not offer any significant mitigation. As noted by Historic England it has not been demonstrated that it is necessary to demolish all buildings and cause this harm to deliver new housing.

83. In terms of the revised NPPF, it is not therefore considered that the less than substantial harm is demonstrably outweighed by any public benefits and in relation to Policy DM9 the application proposes wholesale demolition without justification rather than taking the opportunity to preserve or enhance this important feature of the Conservation Area. The proposal is therefore unacceptable in both respects with regards the impact on the Conservation Area.
84. Where applications directly (or indirectly) affect non-designated heritage assets such as the locally listed church, the Revised NPPF requires a balanced judgement to be taken with regard to the scale of harm or loss and the significance of the heritage asset. In this case, wholesale loss is proposed of an asset with aesthetic, historic and social/communal significance. This loss has also not been justified in relation to any benefits of the proposal or the viability or practicality of retaining it as part of the development with regards Policy DM9.
85. It is appreciated that there is some local support for the demolition of this group of buildings and that they are not universally regarded as having aesthetic value or being worthy of retention. Indeed representations have supported the principle of clearing the site to allow redevelopment for housing (although not without objection to the details of the proposal). Whilst these views are understood and appreciated, when considered against the Revised NPPF and development plan policies, the loss of this group of buildings is considered to cause harm to a designated heritage and loss of an undesignated heritage asset, neither of which are outweighed by any demonstrable benefits of the proposal. Historic England's objection to the application on the basis of the harm to significance of the Conservation Area must also be taken into account and it is concluded that the impact on heritage assets is unacceptable and contrary to paragraphs 192, 193, 196 and 197 of the Revised NPPF and Policy DM9.

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

86. Key policies and NPPF paragraphs – JCS2, DM3, Revised NPPF paragraphs 124, 127-131.

87. Scale, layout, appearance and landscaping are reserved matters which, if this outline application were approved, would be considered in a subsequent application. The indicative plan demonstrates an arrangement of eight dwellings which are described as five no. three storey and three no. two storey. Indicative elevations show two storey terraced dwellings with steep roof pitches.
88. The Conservation Area Appraisal notes that the majority of houses in the Conservation Area are small to medium sized terraces with relatively simple facades which form harmonious groups with a strong sense of rhythm. The scale and form indicated would be broadly in keeping with this prevailing character; however, the proportions and fenestration indicated are at odds with the existing terraced houses and would need to be more sensitively designed at reserved matters stage with careful attention paid to the materials also. The feature of an existing landmark building at the corner of the site would be lost through the indicated design.
89. The application seeks outline permission for up to ten dwellings; however the submitted plan only indicates eight. It is considered that, in principle, the site could accommodate ten dwellings in one form or another, however it would be necessary for these to carefully and positively respond to the character and appearance of the Conservation Area and other constraints of the site. As the indicative plan only shows eight dwellings of a scale and layout broadly appropriate to the area, it is not possible to assess with any certainty whether ten dwellings (and their associated servicing requirements) could be accommodated in the same way.
90. Representations have noted the density would be lower than the previous proposal for 20 dwellings (15/01928/F, also proposed in current application 18/0962/F) but still raise concern the site would be too densely developed. The indicative layout shows a ratio of dwelling to garden space similar to neighbouring dwellings, with the addition of a communal parking area to the rear. The density of a development of eight dwellings (53.3 dwellings per hectare) is likely to be consistent with the character of the area, however the addition of a further two dwellings, to result in a total of ten, would require careful consideration.
91. The retention and replacement of appropriate boundary walls and railings could be secured by condition. The provision of parking on the Park Lane frontage would have an adverse visual impact on the development and wider area, however this is largely an existing arrangement and sensitive design and materials may mitigate this.

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

92. Key policies and NPPF paragraphs – DM3, DM8, Revised NPPF paragraph 124.
93. Landscaping is a reserved matter but the indicative layout would allow for private amenity space to each dwelling and appropriate landscaping.
94. Some representations have sought for public amenity space and/or play space to be provided. The amenity needs of each dwelling could be met within the site and there is no policy requirement for a development of this scale to make new public provision. An indirect contribution would be made through the Community Infrastructure Levy.

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

95. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, Revised NPPF paragraphs 102, 103,108-111.
96. In terms of impact upon traffic flows to and from the site, it is important to note that under the current lawful use, the properties could be used by another faith or community based group, which would carry much higher traffic levels (and parking demand at peak times) than the proposed use. The associated traffic impacts of the proposed use would be comparatively low and would not result in significant highway impacts to the surrounding area.
97. In terms of highway safety, the junction of Park Lane and Avenue Road adjacent to the site does not have any inherent accident problem and is protected by a speed table and 20mph speed limit. Access is the only detailed matter to be considered in this application and there is no highways objection to the proposed arrangement with vehicular access on Avenue Road and off-street parking on Park Lane.
98. The layout submitted indicates 15 parking spaces to eight dwellings. There is local concern that this would be insufficient and put pressure on local on-street parking, however it is considered ample and within standards in accordance with Policy DM31 for up to ten dwellings. Furthermore, the occupiers of the new dwellings would not be entitled to parking permits and existing parking restrictions in the area are considered adequate. The site is highly accessible, located adjacent to a local retail centre, within walking distance of the city centre and around. 220 metres from high frequency bus stops serving the wider area. It also benefits from proximity to several Car Club spaces in the surrounding area as well as being on the Pink Pedalway for cyclists. Given the level of parking on site and high sustainability of the site with alternative travel options, the proposal is acceptable in this respect.

## **Main issue 6: Amenity**

99. Key policies and NPPF paragraphs – DM2, DM11, Revised NPPF paragraphs 127, 180.
100. It is appreciated that this site is surrounded by residential dwellings on all sides and any development of it must be sensitive to this and not result in any unacceptable impacts on the amenity of neighbouring occupiers. Whilst the full impact on the amenity of neighbouring occupiers cannot be fully assessed at outline stage as the precise layout, scale and design of the dwellings is not known, the indicative layout suggests the site could be developed with eight dwellings in a manner that would not result in such impacts. Should this increase to ten dwellings, the additional impacts would require careful consideration. Should outline permission be granted, the representations concerning loss of light and privacy could be taken into account in the detailed design to mitigate any unacceptable impacts.
101. The standard of amenity for future occupiers of the development would also be fully assessed at reserved matters stage and the indicative layout does not suggest there would be any constraints on providing a high standard of amenity to eight dwellings.

## Main issue 7: Flood risk and foul drainage

102. Key policies and NPPF paragraphs – JCS1, DM5, Revised NPPF paragraphs 155-165.
103. The site is at risk of surface water flooding and this varies across the site with the lower portion to the western side at risk of flooding to a likely depth of up to 1 metre and surface water pooling around the existing buildings. This was a significant consideration in the determination of the previous application for conversion (15/01928/F) and whilst the majority of issues were satisfactorily resolved with mitigation measures, the LLFA maintained an objection to this scheme on the basis they considered it more appropriate to avoid the risk altogether.
104. The LLFA have an objection to this application which has not been overcome with the submission of additional information.
105. In accordance with Revised NPPF paragraphs 157 and 158 and Policy DM5, new build development on unallocated sites must pass the sequential test, *i.e.* demonstrate that there are no reasonably available sites appropriate for the development in areas with a lower probability of flooding. Whilst technically the application has not satisfactorily demonstrated this, when account is taken of housing need and the availability of appropriate brownfield sites to meet this need across the city a pragmatic approach is required and it is considered that the flood risk to a proportion of this site does not render it inappropriate for residential redevelopment.
106. It is, however, necessary for the sequential approach to be applied across the site so the most vulnerable elements of the development (the dwellings) are placed in the areas of lowest risk. The LLFA have objected on the basis that this has not been satisfactorily demonstrated at outline stage as layout is a reserved matter. The indicative plan submitted shows the footprint of development largely in the higher portion of the site to the east. One dwelling would be almost wholly within the area at risk to the west. As noted by the LLFA, avoiding the areas at risk should influence the number, arrangement and character of dwellings achievable here in accordance with the sequential approach. In principle it is considered that these matters could be satisfactorily resolved at reserved matters stage and that there is sufficient space to locate a number of dwellings in a sequentially appropriate manner in the lowest risk part of the site. However, the indicative layout does site one of the eight dwellings in an area at risk and it is not apparent whether a total of ten could be satisfactorily accommodated within the lowest risk area whilst also taking account of the other constraints to the site, including enhancing the character and appearance of the Conservation Area.
107. The increase in risk from less to more vulnerable development and absence of an evacuation/emergency plan is also raised. As the precise layout and form of dwellings is not known at this stage, it would be inappropriate to consider an evacuation/emergency plan until reserved matters stage and the provision of safe access and an assessment of hazard level should inform the design. The siting of more vulnerable development in flood risk zone 3 is not unacceptable, subject to passing the exception test. To pass the exception test it must be demonstrated that:

- the development provides wider sustainability benefits to the community that outweigh flood risk; and,
  - a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
108. With regards the sustainability benefits, the provision of up to ten new dwellings is a substantial benefit weighing in favour of this development and considered to outweigh the flood risk which affects only a portion of this site. In terms of the safety and risk on and off site, the development would result in a significantly reduced footprint of buildings and hard surfaces across the site which, subject to the detailed design and assessment below, is likely to reduce surface water run-off and thus risk on and off site. However, the design of appropriate safety and mitigation measures, such as raised floor levels (potentially up to 1.2 metres above ground level), may affect the design and appearance of the dwellings and it has not been demonstrated how.
109. The other points of objection relate to more detailed considerations of a surface water management scheme with appropriate run-off rates and the management of off-site risks. Anglian Water also consider the originally submitted information inadequate, but have recommended a condition to agree an appropriate surface water management strategy.
110. With regards run-off rates, it is appreciated that both the LLFA and Anglian Water would wish to see these at, or as close to, greenfield rates and the demolition of all buildings undermines the applicant's reliance on the existing rate as an appropriate benchmark. The LLFA consider it necessary to agree an appropriate rate at outline stage in order for a scheme to be designed to meet this at reserved matters stage. It is considered that a substantial improvement from the existing situation could be achieved and it would not be inappropriate to leave agreement of an appropriate run-off rate to later consideration.
111. In terms of surface water management, the application suggests opportunities to provide on-site attenuation would be explored in detail at reserved matters stage, however the LLFA have requested information on the area required for storage features to demonstrate these are appropriate and achievable within the constraints of the site. An attenuation tank is proposed in the car park area indicated on the submitted plan, however if the number of dwellings were to be increased to ten this may impinge on the available area and volume of on-site attenuation.
112. It is considered likely that appropriate surface water management and flood risk mitigation measures could be satisfactorily secured with the use of appropriate conditions on any outline permission granted, however the application does not provide sufficient information to consider whether these, along with compliance with the sequential approach, would result in an appropriate form of development for the site with regards all other policies and material considerations.
113. In summary, as an outline proposal it must be considered whether the development is acceptable in principle in flood risk terms. In this case, it is considered that the site is broadly acceptable in flood risk terms and, other policy considerations notwithstanding, could pass the sequential and exception tests in accordance with the Revised NPPF and Policies JCS1 and DM5. However, the application does not

provide sufficient information to satisfactorily demonstrate that the layout, form and design of a development of up to ten dwellings can feasibly satisfy the sequential approach within the site and provide appropriate surface water management and flood risk mitigation measures whilst also responding positively to the other constraints of the site.

114. Representations have commented on the potential inadequacy of the local foul sewer to accommodate the proposed development. Anglian Water have confirmed that the sewerage system and Water Recycling Centre have capacity for the flows generated by the proposed development. There is no known constraint on water supply.

### **Main issue 8: Affordable Housing**

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

### **Compliance with other relevant development plan policies**

120. A number of development plan policies include key targets for matters such as parking provision and energy efficiency. The table below indicates the outcome of the officer assessment in relation to these matters.



<b>Requirement</b>	<b>Relevant policy</b>	<b>Compliance</b>
Cycle storage	DM31	Yes subject to condition.
Refuse Storage/servicing	DM31	Yes subject to condition.
Energy efficiency and renewable energy	JCS 1 & 3 DM3	Should ten dwellings be proposed, it would be necessary for renewable energy sources to be provided and this could be secured by condition.
Water efficiency	JCS 1 & 3	Yes subject to condition. There is no known constraint on the water supply locally.
Trees	DM7	Yes subject to condition. It is noted there is some local support for the retention of the two Lawson cypress on the Avenue Road frontage and it is agreed these make a positive contribution to the street scene which is otherwise largely absent of street trees. As layout is a reserved matter, it is considered that suitable space could be designed to accommodate appropriate replacement planting that could make an equal or greater contribution long term.
Biodiversity	JCS1, DM6, Revised NPPF paragraph 175	An updated bat survey has been undertaken confirming continued bat use of the roof voids in the church and church hall. A license would be required as the loss of the bat roosts could not be avoided. A replacement bat roost feature would need to be provided in one of the new properties and other mitigation and enhancement measures could be secured by condition.
Contamination	DM11, Revised NPPF paragraphs 178-180	Yes, subject to condition. There is no history of contaminative uses on the site.

### **Equalities and diversity issues**

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

## **Local finance considerations**

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

## **Conclusion**

125. This outline application proposes demolishing all existing buildings on site and the erection of up to ten dwellings. Access is the only detailed matter to be considered and the proposal is acceptable in this respect.
126. However, the demolition of this group of buildings, consisting of the locally listed St Peters Methodist Church, the original church building latterly used as the church hall and the Boy's Brigade building, would cause the unjustified loss of a non-designated heritage asset and harm to the Conservation Area. These impacts on heritage assets are not considered to be outweighed by any demonstrable public benefits of the scheme and whilst regard must be had to the local representations in favour of their demolition, the proposal is considered unacceptable and contrary to the provisions of the Revised NPPF and development plan which seek to sustain and enhance the significance of heritage assets and the statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
127. Furthermore, there is insufficient information to satisfactorily demonstrate that the site can feasibly be developed with up to ten dwellings within its constraints in a form and layout which would: preserve and enhance the character and appearance of the Conservation Area; avoid the areas of highest risk of flooding, mitigate any residual risk and provide an acceptable surface water management scheme; and, is acceptable with regards the amenity of neighbouring and future occupiers.
128. The proposal also makes no provision for affordable housing either on-site or through a financial contribution and it has not been demonstrated that providing this would cause the development to be unviable.
129. The development is therefore contrary to the requirements of the Revised National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

## **Recommendation**

To refuse application no. 18/00503/O - St Peters Methodist Church Park Lane Norwich NR2 3EQ; for the following reasons:

1. The demolition of St Peters Methodist Church, the church hall and Boy's Brigade building would result in the total loss of a non-designated heritage asset and less than substantial harm to the significance of the Heigham Grove Conservation Area. This loss of and harm to the significance of heritage assets has not been justified nor is it demonstrably outweighed by any public benefits from the redevelopment of the site that it would facilitate. This loss and harm is therefore unacceptable and contrary to paragraphs 192, 193, 196 and 197 of the Revised National Planning Policy Framework (2018) and Policy DM9 of the adopted Development Management Policies Local Plan 2014.
2. Insufficient information has been submitted to demonstrate whether it is feasible for the site to deliver up to ten dwellings within the constraints of the site in a manner which: preserves and enhances the character and appearance of the Conservation Area; avoids the areas of highest risk of surface water flooding, provides any necessary mitigation measures and an appropriate surface water drainage scheme with acceptable run-off rates; protects the amenity of neighbouring occupiers; and, provides a high standard of amenity for future occupiers. It has not therefore been satisfactorily demonstrated that the proposal complies with Policies JCS1 and JCS2 of the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk 2011, as amended 2014, Policies DM2, DM3, DM5, DM11 of the adopted Development Management Policies Local Plan 2014 and paragraphs 127, 130, 155, 157, 163, 165, 180 and 193 of the Revised National Planning Policy Framework (2018).
3. The application proposes up to ten dwellings with no provision for affordable housing either on-site or through a financial contribution and it has not been demonstrated that providing this would cause the development to be unviable. The proposal is therefore contrary to Policy JCS4 of the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk 2011, as amended 2014, Policy DM33 of the adopted Development Management Policies Local Plan 2014 and paragraph 63 of the Revised National Planning Policy Framework (2018).

### **Article 35(2) Statement**

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



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



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

Drawing Title: Proposed New Street Scene			
Scale: 1:200 @ A3	Date: 16.2.18	Drawn By: SJ	
Drawing No: 9001 / 001	Revision: B		



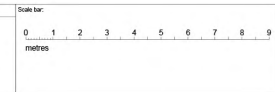
PARK LANE

AVENUE ROAD

- Existing buildings to be demolished
- Surface water
- Retaining wall
- Allocated parking space
- Boundary wall to match existing
- 1800mm closed panel fencing
- Slabbed area - type/colour to be confirmed
- Denotes new tree - type to be agreed by specialist
- Presentation point for bin collection
- Marshall's Driveline Multi Block Paving - colour to be confirmed
- Tarmac finished road
- Loose gravel - type/colour to be confirmed
- Grass

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Rev	Date	Description
A	10 Feb	Original Issue
B	07 Apr	Addition to Rev. Existing buildings to be demolished



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

Drawing Title			
Proposed Roof Plan			
Scale:	1:200 @ A3	Date:	16.2.18
Drawn By:	SJ	Revision:	B
Drawing No.:	9001 / 002		