

Report to Planning applications committee

Item

12 September 2019

Report of Head of planning services

Subject Application nos 19/00933/F and 19/01014/L - 5
Recorder Road, Norwich, NR1 1NR

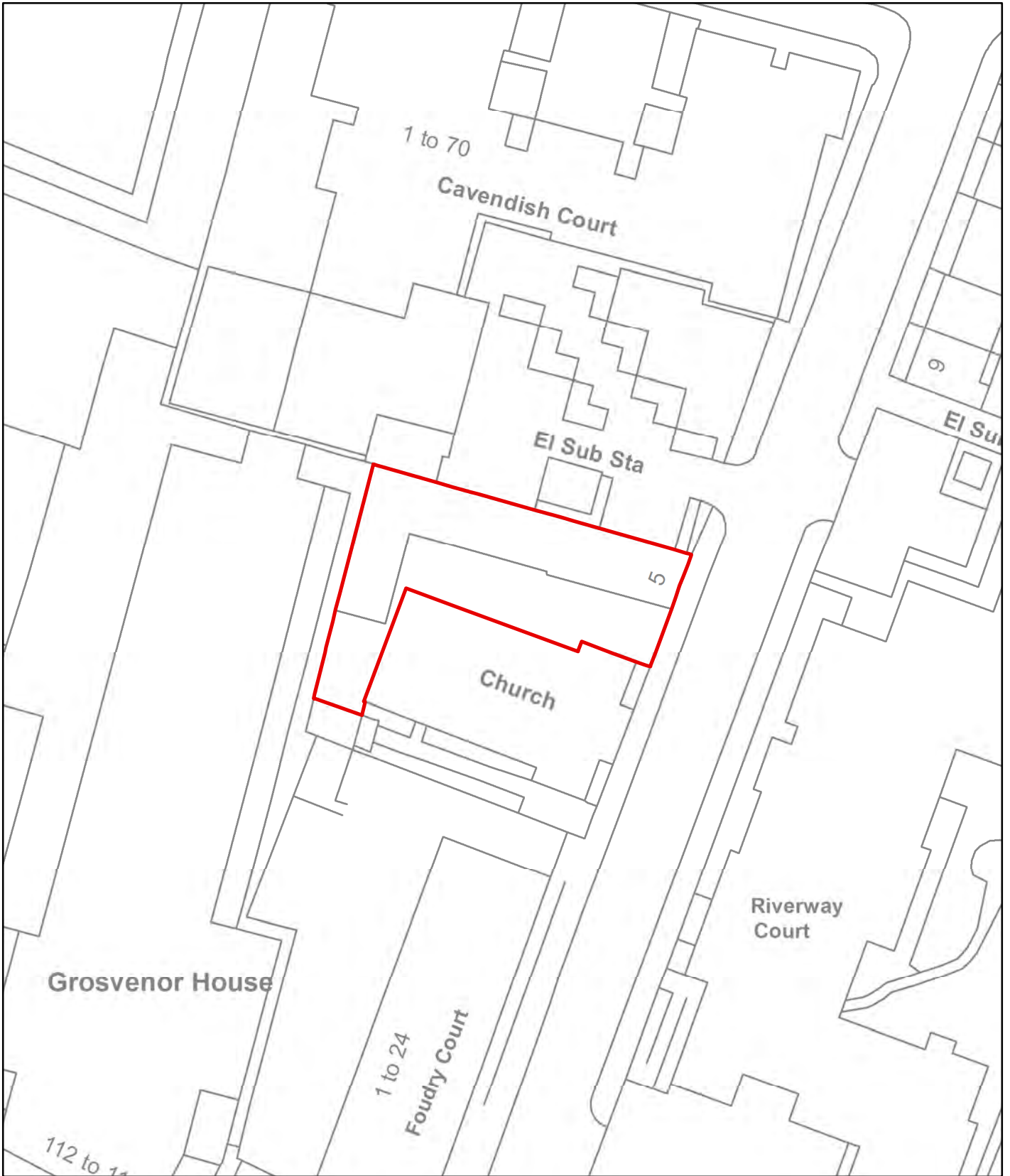
4(a)

Reason for referral Objection

Ward:	Thorpe Hamlet
Case officer	Katherine Brumpton - katherinebrumpton@norwich.gov.uk

Development proposal		
Change of use to assessment centre (residential institution - Class C2) with associated works.		
Representations		
Object	Comment	Support

Main issues	Key considerations
1 Principle of development	Loss of offices and location of a centre at this site
2 Design	Minor alterations to facilitate change of use
3 Heritage	Minor alterations to facilitate change of use
4 Transport	Provision of cycle and refuse storage
5 Amenity	For future occupiers and potential impact from antisocial behaviour and 27/7 nature of site
6 Flood Risk	Located within a Flood Zone 2
Expiry date	30 August 2019
Recommendation	Approve



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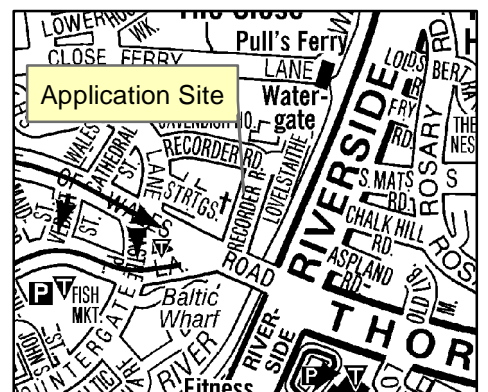
Planning Application No 19/00933/F & 19/01014/L
 Site Address 5 Recorder Road

Scale 1:500



NORWICH
 City Council

PLANNING SERVICES



The site and surroundings

1. Site is located adjacent to Grosvenor House to the rear (west), an electricity substation and Cavendish Court to the north (side) and the Greek Orthodox Church of the Mother of God to the south (side).
2. The wider area includes 4 blocks of flats which appear to be mainly used for sheltered accommodation, although only one block is strictly tied by planning conditions (Riverway Court). The others are Cavendish Court, Cavendish House and Stuart House. Most of these have at least partially gated entrances.
3. Another block of flats which appears to have no restriction or established type of residential use (Foundry Court) is located the other side of the church. Also along Recorder Road lies offices, dwelling houses, more flats, and The St James Stuart Garden.
4. Beyond the immediate area lies Prince of Wales Road, which is a busy transport route leading up to the train station. Most of this road is classed as a Late Night Activity Area. The Riverside walk is located to the east behind Recorder Road, and the Cathedral Close is located behind Recorder Road to the north. As such the nature of the wider area is relatively mixed.

Constraints

5. The adjacent Church is Grade II Listed and 5 Recorder Road is listed by association. The Church is now called the Greek Orthodox Church of the Mother of God to the South, but was originally called the Church of Christ Scientist. The listing includes the walls, gate piers and gates adjoining south east and north east, with the details as follows:
 - a) The following building shall be added to the list:- TG 2308 NE RECORDER ROAD (west side) Church of Christ Scientist 17/10000 including walls, gate-piers and gates adjoining SE and NE - II Christian Science church. 1934-5 by Herbert G Ibberson. English bond buff-coloured brick. Slate roofs with parapeted gable ends. Plan: Nave with narrow aisles, readers' platform in chancel at west (liturgical east) end with flanking readers' rooms and gallery at east end with stair and porch on south east corner. Arts and Crafts and Modern. Exterior: The east gable end onto the street has tall lancet with pointed ogee arch formed from cut bricks and with weathered slate sill with large stone inscription below. Small round arch windows in single storey block on right and stair wing on left which has similar lancet on its S gable and porch in the angle with round arch doorway. N and S sides of nave have narrow vertical pilaster-like strips in brick containing tall lancets each with small light above and low aisles below with flint and brick chequerwork walls. Lower chancel with low flat roof readers' rooms either side. Slender octagonal fleche over east end with louvres and copper clad spire. Interior: Exposed rendered walls. Low segmental arch arcades under large blind segmental arcades with polygonal piers rising to roof, and deeply splayed lancets with small ogee lancets in clerestory above: at springing of the arches corbels supporting lamps. Short barrel-vaulted chancel, with readers' room doorways to left and right with double ogee arches on deep splays. Cantilevered gallery at east end with boarded front.

Boarded roof on boxed-in steel trusses. Slightly sloping nave parquet floor. Original readers' desks and steps up and original electric radiators. Including: brick and flint chequered area walls flanking east front with small brick gate-piers, steel gates and overthrows.

6. Conservation Area (City Centre: Prince of Wales Character Area)
7. Area of Main Archaeological Interest
8. Flood Zone 2
9. City Centre Parking

Relevant planning history

10.

Ref	Proposal	Decision	Date
4/1990/0987	Part re-development of site to provide three storey office block.	REF	07/03/1991
06/01037/U	Proposed change of use to Chiropractic Practice.	CANCLD	23/11/2006
07/00827/U	Conversion of the building to office and external alterations including glazed roof, new doors, replacement windows and doors.	APPR	17/01/2008
07/00871/L	Internal and external alterations including glazed roof, replacement and installation of new doors and windows, removal of chimney breast and rearrangement of partitions.	APPR	30/01/2008
08/00637/D	Condition 4a) Details of doors; b) windows; for previous listed building consent (app. No. 07/00871/L) "Internal and external alterations".	APPR	11/07/2008

The proposal

11. Proposal is for a change of use from offices to an assessment centre for homeless people. The centre would be a Somewhere Safe to Stay Hub (SSTS), and provide emergency short term accommodation for homeless people. During their stay an assessment would be made of their needs and a resettlement plan developed. SSTS hubs are a national initiative by the Ministry of Housing, Communities and Local Government (MHCLG).

12. A revised Planning Statement and revised Additional Information Statement from St Martins Housing Trust were provided, which have been made publically available but were not specifically reconsulted or re-advertised as they do not alter the proposal, but serve to provide more detail and context.
13. Physical works are relatively minimal, and include works to external access ramps, replacement of a window with a door, alterations to internal stud walls and installation of a pedestrian gate, CCTV and lighting. The installation of bed pods would also occur, constructed from timber and of 2m in height they are considered temporary.
14. The ground floor would be used for accommodation and a large office upstairs used for assessments.

Summary information

Proposal	Key facts
Scale	
Total no. of beds	16 bed pods, each for occupation of up to 72 hours. To include 3 accessible pods.
No. of storeys	Most of the building is single storey, with a two storey section adjacent to the road.
Appearance	
Materials	External works limited to a new concrete ramp, 2 handrails, a pedestrian gate and a new timber door.
Operation	
Opening hours	24/7 for occupiers, however admittance of new occupiers will be limited to between 7am and 9pm, except in emergencies. Main assessment times and visits from specialists would occur between 8am and 6pm.
Transport matters	
Vehicular access	No change, direct from Recorder Road
No of car parking spaces	No change (4)
No of cycle parking spaces	Details to be conditioned

Representations

15. Advertised on site and in the press. Adjacent and neighbouring properties have been notified in writing. The following have been received:-

16. 19/00933/F – 107 objections; 3 comments neither objecting nor supporting; 4 support; 4 petitions objecting with 48, 53, 6 and 6 signatures respectively. NOTE: for the purpose of this report identical or near identical letters are considered to be petitions.
17. 19/01014/L – 34 objections; 3 support
18. Representations are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Issues raised	Response
A significant percentage of Recorder Road is occupied by elderly retirement homes (approx. 200/250 residents). Application does not acknowledge this. A number of these residents have severe disabilities, and due to their age most residents retire early for the night.	See main issue 5
Needs of the homeless should not be prioritised over the existing rate paying residents	See conclusion.
There are two schools nearby; would the students be at risk from the proposal? What example would it present?	See main issue 5
Area is very quiet and part of the riverside walk; it is not part of the main hub with no shops. Application incorrectly describes the location.	See main issue 5
Homeless and rough sleepers wandering outside people's homes would make the residents feel very ill at ease and nervous. Some rough sleepers have additional problems such as substance and mental health problems and are therefore unpredictable.	See main issue 5
Some rough sleepers may not wish to enter the centre and be disruptive and difficult on arrival. 3 stage warning system is inappropriate; no antisocial behaviour should be tolerated.	Some types of antisocial behaviour won't be tolerated at all, and result in eviction.
Concerns regarding what happens after 72 hours; will they sleep rough again nearby?	The provision is for an assessment centre, therefore any clients are moved to suitable accommodation following their short stay.

Issues raised	Response
<p>Building is not suitable; sleeping pods are too small (no room for stretchers etc adjacent to beds), lack of natural light for all the pods, air flow minimal, low provision of bathrooms (concerns if there is a flu outbreak or similar), no private interview rooms or medical examination rooms, no recreation area, kitchen or laundry facilities. Inadequate fire exits or emergency exits. The lack of facilities could leave to some residents leaving before they are rehoused and using public areas to urinate in (there are no local public toilets)</p>	<p>The nearest public toilets are located in Rose Lane Car Park. See also main issue 5</p>
<p>Existing antisocial behaviour in the immediate area, to include a homeless person sleeping on a flat roof in Cavendish Court, people urinating in the grounds of Cavendish Court, smoking drugs, abusive language and behaviour, items discarded on private property (food waste, condoms, clothing and drug paraphernalia). James Stuart Gardens and the riverside walk is often misused too. Proposal would exacerbate these problems. The extent of the responsibilities of the staff at the centre would probably not extend to any additional antisocial behaviour in the wider area.</p>	<p>See main issue 5.</p>
<p>No consultation of the healthcare organisations has occurred. How would residents access off site medical care?</p>	<p>See main issue 5</p>
<p>Concerns that the staff would not be able to cope with residents who might have multiple problems and would not be security trained.</p>	<p>See main issue 5. All staff will be security trained.</p>
<p>Proposal would add increased demands for the police; statistics show that typically 85 crimes are reported per month between the Railway Station and Rose Lane.</p>	<p>The level of crime is noted within the consultation response from the Police, however they have not offered an objection if their recommendations are implemented. See also main issue 5</p>
<p>Proposal would result in trespassing, and inevitably result in noise, disturbance and social problems, to include health risks from drug paraphernalia. A lot of the elderly residents are on prescription drugs and this could make them a target from theft.</p>	<p>See also main issue 5</p>
<p>Proposal would result in overlooking and light pollution from the CCTV and external lights.</p>	<p>External lighting and CCTV would be covered by a condition which would</p>

Issues raised	Response
To include cameras directed at residents homes and an areas of the adjacent church used for Sunday school and the visiting Priest's bedroom.	enable control over any impacts upon neighbours. Furthermore there is CCTV legislation which controls its use.
Concerns that residents will be accosted from beggars.	See also main issue 5
Concerns that some residents may be coming straight from prison and from outside the area. Government statistics state that 28% of adult ex-prisoners and 62% of ex-prisoners serving 12 months or less are proven to re-offend within twelve months. The unit should not be a busy centre catering for other areas.	The centre is designed to address the needs of local homelessness. See also See also main issue 5
Negatively impact property prices	This is not a material planning consideration.
Proposal would encourage drug dealers onto the road.	See also main issue 5
There are better sites within the city centre. There are no other complimentary services nearby.	See main issue 1
Location would allow easy access to pubs and drug dealers	See also main issue 1
Lack of parking and proposal would result in increase of traffic. In addition the road is currently closed (except for access) at night; the proposal would likely result in an increase of traffic during these hours particularly, to include emergency services Not convinced that 4 spaces can be provided.	See also main issue 4
Application appears very rushed. More consideration should be given to other locations.	The application is a result of a grant award, and there are strict timetables for the money to be spent. It is understood that other locations have been considered, but this type of application does not require sequential test to justify the location.
Consultation period too short and not enough people were written to.	The consultation period was the standard statutory 21 days. As site notices were erected there was no statutory requirement to send neighbour notification letters, however it is the

Issues raised	Response
	council's standard approach to send letters to neighbouring properties within 10m of the application site boundary. This approach was taken. Due to the short delay in erecting the site notices the actual period for neighbour consultation equated to just over 1 month.
Proposal not needed; a recent meeting with St Martins indicated that there were approximately 43 homeless people currently in Norwich. This centre could accommodate 1.946 people per year.	See also main issue 1
Church was unfairly quoted within the submission and hadn't been formally consulted.	The document has been superseded and replaced by a revised Additional Information Statement from St Martins Housing Trust. The church has now been formally consulted.
Introduction of hard boundaries between the church and site will undermine the smooth operation of the church; there is currently an informal arrangement where the outside space and access to 5 Recorder Road is used by the church. These arrangements are as a result of the site being split some 30 years ago.	The arrangement of any use of the site by the church is informal and does not form part of this planning application. It is understood that the church did not have any formal rights to use the site and so this is not a material planning consideration.
Proposal would impede the Church's emergency access and access to the shed.	The gates will be left unlocked when the church is in use. The church has a shed located to the south west of their main building. There is no anticipated impact upon the access to the shed; there are doors on both the east and north elevations.
If the boundary treatment is altered for the site then it would need to be altered for the church. This would also impact the character of the Grade II building.	Details of boundary treatments would be covered by conditions. Any impact upon heritage assets would be fully assessed.
Proposal would deter church goers and make undertaking Christian activities within the church difficult due to noise pollution e.g. services, prayer and Sunday School.	See also main issue 5

Issues raised	Response
Recent meeting for the residents of Recorder Road with the Chief Executive of St Martins did not address concerns.	Noted.
Concerns over confusion over use of the first floor; is this for clients as well as staff?	The submitted documents refer to the first floor as a space to be used for both staff and residents.
Concerns regarding the ability of St Martins to manage the site; there has been criticism of their other sites.	See also main issue 1 and conclusion
St Martins have publicised that the SSTS will be open in Autumn- has a decision already been made?	No decision has been made.
Facility is much needed and is in a sensible location.	See also main issue 1

Consultation responses

19. 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

20. No objection. Works to the listed building are minimal, amounting to the addition of fixings for a gate. The works to the curtilage listed building will result in some minimal impact upon the special character of the host listed building, however this is outweighed by the benefits of enhancing the accessibility of the building and securing the long term preservation. Conditions requested.

Environment Agency

21. No comments: falls under EA's National Flood Risk Standing advice and therefore falls into the remit of the council to assess the flood risk.

Highways (local)

22. No objection on highway grounds. Business uses in the city centre do not have on-street parking permit entitlement. Visitors may use the pay and display parking on street nearby or the Rose Lane multi storey car park.

Norfolk historic environment service

23. No formal comments, but would encourage the use of heritage interpretation as per the submitted Heritage Statement.

Norfolk police (architectural liaison)

24. Whilst Norfolk enjoys low crime levels the city centre, as expected, has the highest crime rates for the county. The location of Recorder Road off Prince of Wales Road (the centre of the night-time economy) sees our highest levels of crime and disorder.
25. The proposal could attract those who will seek to exploit the vulnerable residents, such as drug traffickers.
26. Reassuring that the proposal is from St Martins. Whilst they appear to have the necessary expertise to run it they seek assurance that they will be able to deal with any exploitation of the residents.
27. There are several recommendations to enable Norfolk Constabulary to support the application. These include:
 - (a) Installation of security gates/improvements to the boundary treatments
 - (b) Installation of evidential quality CCTV
 - (c) Installation of external lighting
 - (d) Adequate external door and windows meeting safety standards
 - (e) Electronic access to the sleeping areas from reception
 - (f) Staff should be security trained.

Strategic Housing

28. Development is welcomed. It fits in with Norwich City Council's (hereafter the Council) corporate plan 2019-22 which states that the council will tackle rough sleeping and homelessness. The Council will do this by;
 - (a) Address the supply of affordable housing;
 - (b) Continue to be proactive in delivering the legal responsibility to assess people who present themselves as homeless (or at risk) and develop an appropriate way forward;
 - (c) Continue the collaborative work with public and other sector partners to address the complexities of rough sleeping and homelessness;
 - (d) Implement a housing first model which seeks to stabilise people in accommodation with wrap around support addressing any wider needs; and
 - (e) Continue to address wider issues and collaborate with health colleagues where appropriate; those sleeping rough are not always homeless.
29. The council also has a tackling rough sleeping strategy 2017-22 that includes the following priorities;
 - (a) "Reduce the number of rough sleepers on our streets and where possible develop interventions to stop it from happening in the first place."
 - (b) "Make the best use of our supported housing system to help people move away from homelessness for good."
30. The council has received significant funding in both capital and revenue funding from the Ministry of Housing Communities and Local Government (MHCLG), which would support this service. This proposed development will fulfil the requirements of the funding. The funding requires the council to "make an assessment hub an integral

part of the rapid rehousing pathway to make a positive impact on rough sleeping numbers". More details can be found within the full response from Strategic Housing.

31. Between July 2018 and July 2019 243 young people were referred to the YMCA Norwich Central with only 75 being able to be accommodated. This assessment centre will provide immediate assistance to assess and help signpost and provide the appropriate type of accommodation and prevent rough sleeping.
32. Bishop Bridge House is another hostel run by St Martins Housing Trust and is consistently full. There are 25-30 people waiting for beds and living on the street at any given time.
33. St Martins have since 1972 run supported housing schemes in the city. They have a proven track record in managing these schemes with partner agencies to include the Police and Council, and have robust policies and procedures in place. They have an excellent relationship with neighbours at existing schemes and have continuously committed to engage with the local communities.
34. St Martins has considered other locations but due to the requirement that it must be centrally located with easy access for the users 5 Recorder Road is considered the most suitable location for this service.

Assessment of planning considerations

Relevant development plan policies

35. **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
 - JCS4 Housing delivery
 - JCS5 The economy
 - JCS7 Supporting communities
 - JCS9 Strategy for growth in the Norwich policy area
 - JCS11 Norwich city centre
36. **Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)**
 - DM1 Achieving and delivering sustainable development
 - DM2 Ensuring satisfactory living and working conditions
 - DM3 Delivering high quality design
 - DM5 Planning effectively for flood resilience
 - DM9 Safeguarding Norwich's heritage
 - DM11 Protecting against environmental hazards
 - DM12 Ensuring well-planned housing development
 - DM13 Communal development and multiple occupation
 - DM17 Supporting small business
 - DM22 Planning for and safeguarding community facilities
 - DM23 Supporting and managing the evening and late night economy
 - DM28 Encouraging sustainable travel
 - DM30 Access and highway safety
 - DM31 Car parking and servicing

- DM32 Encouraging car free and low car housing

Other material considerations

37. Relevant sections of the National Planning Policy Framework March 2012 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF4 Decision-making
- NPPF6 Building a strong, competitive economy
- NPPF8 Promoting healthy and safe communities
- NPPF9 Promoting sustainable transport
- NPPF11 Making efficient use of land
- NPPF12 Achieving well designed places
- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF16 Conserving and enhancing the historic environment

38. Supplementary Planning Documents (SPD)

- Heritage Interpretation SPD (2015)

Case Assessment

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

Main issue 1: Principle of development

40. Key policies and NPPF paragraphs – DM1, DM17, DM22, JSC7, NPPF paragraphs 91-95.
41. The proposal would result in a community facility, providing a residential assessment centre for homeless people. It would result in the current established use of the site as an office being lost. The principles of both of these are considered below.

Loss of offices

42. The site's current use is as offices, and as such the proposal would result in the loss of offices. DM17 states that sites and premises providing for small and medium scale businesses, such as this site, will be safeguarded for this use. However their loss is acceptable where there is no demand in this area for small and medium scale businesses and,

- (a) the site or premises is no longer viable, feasible or practicable to retain for business use; or

- (b) retaining the business in situ would be significantly detrimental to the amenities of adjoining occupiers, would prevent or delay the beneficial development of land allocated for other purposes or would compromise the regeneration of a wider area; or
 - (c) there would be an overriding community benefit from a new use which could not be achieved by locating that use in a more accessible or sustainable location
43. The submitted Planning Statement (revised) states that the site has been actively marketed for 6 months with no success, despite 11 viewings. Furthermore the statement indicates that the market for offices is saturated, with many office buildings currently empty.
44. As discussed later in the report the proposal has clear identifiable community benefits

Assessment Centre

45. DM1 states that development proposals will be expected to;
- (a) provide for a high level of safety and security, maximising opportunities for improved health and well-being and safeguarding the interests of the elderly and vulnerable groups;
 - (b) help to promote mixed, diverse, inclusive and equitable communities, by increasing opportunities for social interaction, community cohesion, cultural participation and lifelong learning.
46. The development aims to assist homeless people, a vulnerable group, by providing help to assist them in finding accommodation and addressing any other identified needs. By helping this group of vulnerable people the proposal would help to achieve a more equitable community and increase the opportunities for the individuals.
47. The proposed centre would be residential in nature, providing sleeping pods for up to 16 individuals at any one time. It would also act as an assessment centre for these residents, with the site providing short term emergency accommodation only. Whilst at the site the residents would be assessed before being moved into more suitable longer term accommodation, with each individual being given a key worker. The length of stays should be no more than 72 hours. The Somewhere Safe to Stay (SSTS) hub will aim to reduce the impact of rough sleepers within the surrounding streets and across the city centre.
48. The applicant, St Martins Housing Trust, is part of Pathways Norwich. Pathways is a service which comprises of seven partners and aims to find accommodation for homeless individuals as well as supporting those threatened with homelessness. The site is intended as an assessment centre that would support the wider work of Pathways Norwich and St Martins by providing emergency accommodation. The SSTS would be part of the Hostel Move on Agreement in Norwich, and therefore have full nomination rights into a number of other more permanent hostels.
49. The numbers of homeless people has increased in the East of England by 135% between 2010 and 2018. Recent figures for Norwich indicate a fall between 2017

and 2018 (from 30 to 21), but this has risen again recently to 43 individuals as of June 2019.

50. The proposed centre would utilise the existing support structure for homeless people in Norwich, such as community lunches at several churches, Salvation Army evening soup run, the Pottergate ARC, City Reach Health Service (Westwick Street). The location is within an area which attracts rough sleeping.
51. DM22 provides advice regarding community facilities, and states that new facilities will be permitted where they contribute positively to the well-being and social cohesion of local communities, with preference given to the city centre or within local and district centres.
52. The proposal is located within the city centre and so is considered to be an acceptable location for a community use. Given that rough sleepers are known to use the wider area and that the existing support network for homeless people is all local, focussed within the city centre, the site is well situated to serve the homeless community.
53. The proposal will contribute positively to social cohesion and well-being of the wider society by providing the homeless with opportunities to address their situation and increase their opportunities.
54. As identified above there are several elderly housing schemes in the immediate area. Elderly residents are also identified as a vulnerable group and DM1 is also therefore applicable to this group. Developments should provide a high level of safety and security for this group, maximising opportunities for improved health and wellbeing.
55. The proposal has raised a significant level of opposition, to include representations from the elderly. Concerns include fear of crime and potentially impacts upon their wellbeing. This is discussed within main issue 5.

Main issue 2: Design

56. Key policies and NPPF paragraphs – JCS2, DM3, NPPF paragraphs 9, 17, 56 and 60-66.
57. An existing window is proposed to be replaced with a door, to enable a fire escape for one of the male sleeping areas. An additional concrete ramp is proposed, together with railings for the new ramp and existing ramp. The additional ramp would enable accessible access to the reception area, and thereafter the disabled male sleeping area. The proposed design is functional and simple.
58. A new pedestrian gate is proposed which would prevent access between the church's external space and the site. This would be attached to both the church and 5 Recorder Road.
59. Minor alterations are also proposed which include CCTV and external lighting. The details have not been submitted, but would be conditioned.

Main issue 3: Heritage

60. Key policies and NPPF paragraphs – DM9, NPPF paragraphs 189-202.

61. The building is considered to be curtilage listed, linked to the adjacent church. The building was however originally constructed as part of the 19th century vinegar works, and was then later used for worship by Christian Scientists before becoming offices.
62. The proposed new doorway is in a location where there was previously a door, and the current window dates from planning application 07/00871/L. Internal alterations are otherwise limited to 3 areas of alterations to modern partitions, and are proposed to enable disabled shower rooms to be constructed and one office to better fit 2 pods.
63. The relatively minor alterations are considered to have some impact upon the setting of the listed building. The proposal would result in less than substantial harm to the curtilage listed building. However, the concerns are outweighed by the desirability of securing the buildings long term preservation and the associated public benefits which include enhancing the accessibility of a curtilage listed building. As such the proposal, with appropriate conditions, is considered to comply with DM9 and the NPPF.
64. An A4 poster is proposed to be displayed in a ground floor window visible from the street which would explain the history of the building. This would serve to meet the requirements within the Heritage Interpretation SPD, and would be required via a condition.

Main issue 4: Transport

65. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, NPPF paragraphs 17 and 39.
66. The location is considered to be accessible, with the train station just under 150m away and the adjacent Prince of Wales Road a public transport corridor which is served by a considerable number of buses. There is also a large multi-storey car park nearby, in addition to some pay and display parking on Recorder Road.
67. No changes are proposed to access the site, which is through gates which are part of the Historic England listing.
68. Provision of car parking for 4 cars will remain. The installation of the ramp is not anticipated to significantly impact this. However, in this location the DM Plan requires that only 1 car parking space is provided and therefore if the ramp does reduce the number of car parking spaces this is not a concern.
69. Provision of 1 Sheffield stand for 4 cycles is proposed, which would meet the requirements of the DM Plan in terms numbers, in addition to some informal storage inside for staff. The requirement in the plan is for 5 spaces, but if the assessment centre had 15 instead of 16 beds this would drop to 4. A covered and secure shelter is not proposed, with the application stating that this is for heritage reasons. No detail of any storage has been provided so a condition will be added, with covered and secured storage agreed if practicable. Informal internal storage is not considered ideal.
70. Concerns have been raised that the proposal will prevent the Church from using this car park. However, the use by the church has only ever been by informal arrangement as the site is not within its ownership. This informal arrangement will

cease if permission is approved but could have been withdrawn at any time. The inability of the church to use the land for car parking anymore is not, therefore, a material planning consideration.

71. The site is large enough to accommodate commercial bins easily, although no details have been provided. This can be included within a condition.

Main issue 5: Amenity

72. Key policies and NPPF paragraphs – DM2, DM11, DM12, DM13 NPPF paragraphs 9, 17 and 91.
73. The building will be staffed by at least two people at any one time. The building and pedestrian gate will be kept locked at all times, with all emergency escape routes alarmed. The gate to the street will be locked except when the church is in use as there are fire escapes across the courtyard area.
74. CCTV will cover the interior and exterior of the building. The submitted details indicate that the CCTV would also cover the street and external areas of adjacent property, however it is understood that it cannot legally be sited to be front facing or directed into neighbouring properties

Existing residents

75. The majority of the objections received have raised concerns regarding the impact of the proposal upon their amenity. This is largely focussed on concerns that the development would result in increased levels of crime and antisocial behaviour, either actual or perceived.
76. Section 17 of the Crime and Disorder Act 1998 requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder. Furthermore NPPF paragraph 91 states that planning decisions should aim to achieve places which are “safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life”. As such any anticipated increases in crime, together with any increase in the fear of crime are both capable of being material planning considerations in the determination of this application. Any fears of an increase in crime or anti-social behaviour need to be supported by evidence in order for them to weigh in the balance; in this instance the police’s comments support some of the fears of existing residents. The police acknowledge that uses such as that proposed can attract people who prey on the vulnerability of the homeless, including drug dealers, and lead to an increase in anti-social behaviour as a result of behaviour caused by addiction to either alcohol or drugs.
77. The submitted Planning Statement and Additional Information Statement from St Martins Housing Trust provide information on how the site would be managed. Both of these documents were revised following discussions with the agent regarding the amount of information initially submitted. In addition the agent has submitted an email containing additional information.
78. The applicant, St Martins, is a local homeless charity and has been operating since the 1970’s. They currently run 2 hostels, a residential care home, a sheltered housing complex, 5 flats and various group homes (housing 60 people). In addition they take the lead on the Pathways project and provide several other outreach

services too. The charity is normally supporting around 200 people and has 150 paid staff and 200 volunteers.

79. The site will not be actively promoted as a drop in centre. St Martins and partner organisations won't send people directly to the site; individuals need to be referred into the service. As such the direct visitors/users of the site will be restricted to a maximum of 16 residents, the staff based at the site and staff of the partner organisations. If people do turn up they will be seen by an advisor and directed to the appropriate service. This approach should help to alleviate concerns that groups of clients/those associated with clients will loiter around the area.
80. Where individuals are identified off-site the Pathways team will make contact and offer support, and collaborate with the police and other organisations where appropriate.
81. As part of the assessment of clients there will be active management on site by staff together with the allocation of a case worker. The centre would be staffed all the time with night workers employed. The assessment team includes a Mental Health Nurse and Nurse Practitioner. The centre would expect all residents to sign their licence agreement, which is used for their sites elsewhere. This agreement includes what behaviour would result in eviction, and what behaviour would lead to warnings. A 3 point warning system would be imposed, where on the 3rd offence the resident would be evicted. On occasions the police may be involved with evictions, and remove the individual off and away from the premises.
82. In mitigating against anti-social behaviour issues, planning case law states that substantial weight may be placed on the experience of the management organisation who is seeking permission for accommodation for the homeless. As already detailed above, St Martin's is a local charity that has been long established. This experience has been reflected within the response from the Police Architectural Liaison Officer who has stated that it is reassuring that the proposal is coming from St Martins and that they seem to have the relevant expertise. As such it is appropriate to place substantial weight on the experience of the applicants in managing accommodation for the homeless.
83. The concerns regarding the potential impact from external lighting and CCTV are noted but are not considered to be of great weight. The details of both of these would be conditioned and therefore the impacts controlled. The CCTV cannot be legally directed into neighbouring properties.

Future occupiers of the proposed development

84. Policies DM2, DM12 and DM13 are all relevant to the residential amenity of future occupiers of developments. Whilst the proposal is not for housing, the thrust of these policies are still considered relevant.
85. Clearly there are significant benefits for the future occupiers' amenity in being housed, albeit temporarily, to include the provision of bathroom facilities. The hub would act as a gateway for permanent accommodation, providing clear strong amenity benefits for the future occupiers.
86. There is no external amenity area provided as part of the proposal, and no internal communal area. A drinks machine will be installed and a kitchen area used if

necessary (e.g. food for medical reasons and medicine storage). The centre's focus is on short term respite and assessment. There will be no opportunity for longer residential stays as the ethos of the centre will be to ensure that there remains ongoing capacity for new clients.

87. Given the nature of the site and that residents will only be housed here on a very short term basis the lack of facilities, such as recreation areas, is acceptable. The site is considered to be appropriate for temporary residential use in terms of amenity and the residents should not be significantly impacted from any external factors such as noise pollution.
88. Measures to secure the safety of occupants and staff, including fencing, as suggested by the police in their response can be secured by condition. Details have not been provided at this stage.

Conclusion

89. The amenity of future residents is considered acceptable, as the site would only serve as temporary accommodation.
90. There are concerns that the proposal would result in disturbance from noise, and that the proposal would result in an increase in antisocial behaviour. The site is within a relatively high crime area, with the demands associated with the night-time economy focussed on the nearby Prince of Wales Road.
91. The advice from the Police Architectural Liaison Officer includes several physical improvements to the site which would ensure that the safety and welfare of the employees and residents are ensured. These would complement the management proposals set out within the submission, and help to ensure that the site is run in a manner to reduce the impact upon the wider neighbourhood.
92. The proposed development may result in some increases in crime and anti-social behaviour in the surrounding area. However, in mitigation, the applicants have a track record of managing accommodation for the homeless and significant weight can be attached to this. The methods used by St Martin's can be secured by condition requiring, for example, a management plan and CCTV, to ensure they are carried forward in the event that the ownership of the site changes. It is also material that the police have acknowledged St Martin's experience. However, despite the best efforts of those running the centre and their supporting partners, there is likely to be some residual impact upon the surrounding area.
93. There is also a wider benefit of the proposed development in addressing wider needs in the city to address homelessness and the impacts that it has both on the individuals who become homeless but on the character and general amenity of the city as a whole. These wider benefits may also be weighed in the planning balance.

Main issue 6: Flood risk

94. Key policies and NPPF paragraphs – JCS1, DM5, NPPF paragraphs 148-150 and 155-165.

95. The site is located completely within Flood Zone 2. The proposed change of use would change the vulnerability of the use from “less vulnerable” to “more vulnerable”. A sequential test is not required as the proposal is for a change of use.
96. Paragraph 48 Reference ID: 7-48-20140306 of the NPPF Planning Practice Guidance states that applicants for change of uses where the vulnerability increases must submit a Flood Risk Assessment (FRA), and demonstrate that the future users will not be placed in danger from flood hazards throughout its lifetime.
97. The FRA identifies that the ground floor includes a lower area (1.14m AOD) sited to the front of the site, with the rest of the area sat at 2.43mAOD. The first floor is set at 4.683mAOD.
98. Fluvial events considered include 1 in 20 years, 1 in 100 year and 1 in 1,000 years. Climate Change has also been taken into account. In all flood events the first floor would provide a safe refuge. In 4 of the 7 events the higher ground floor would remain unaffected and 3 of the 7 events the lower ground floor would remain unaffected.
99. The FRA recommends several mitigation measures, to include a Water Entry Strategy and a Warning and Evacuation Strategy. The FRA proposes mitigation measures as part of the Water Entry Strategy but these are not indicated on the plans and it is unclear if all the measures would be practical. The Warning and Evacuation Strategy is outlined in detail but lacks a Business Flood Plan.
100. With more details, to include a robust Business Flood Plan, the risk to future users is considered acceptable. The unit would be staffed 24/7 and all staff would be expected to be fully aware of the Business Flood Plan, which is likely to include details such as preparing a flood kit, being aware of safe evacuation routes and signing up to the Floodline Warnings Direct. With a suitable condition requesting these details and implementation of any measures prior to occupation, the proposal is considered to comply with DM5 and NPPF.

Compliance with other relevant development plan policies

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

Requirement	Relevant policy	Compliance
Cycle storage	DM31	Yes subject to condition
Car parking provision	DM31	Yes
Refuse Storage/servicing	DM31	Yes subject to condition

Other matters

102. The following matters have been assessed and considered satisfactory and in accordance with relevant development plan policies, subject to appropriate conditions and mitigation:
103. No changes to landscaping are proposed other than the installation of the ramp and pedestrian gate. Compliance with DM3 and DM8 is achieved.

Equalities and diversity issues

104. Under the Equality Act 2010 age is a protected characteristic and therefore it is against the law to discriminate against someone based on their age. Disability is also a protected characteristic, but homelessness is not. However as detailed above, within the consultation response form the Housing Strategy team, the Council have other obligations towards homeless individuals which are capable of being material considerations.
105. As discussed above the proposal would provide clear benefits for the homeless but have some negative impacts upon the amenity of the elderly residents living nearby. The provision for disabled homeless people within the site is considered acceptable.

Local finance considerations

106. 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.
107. 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.
108. In this case local finance considerations are not considered to be material to the case.

Conclusion

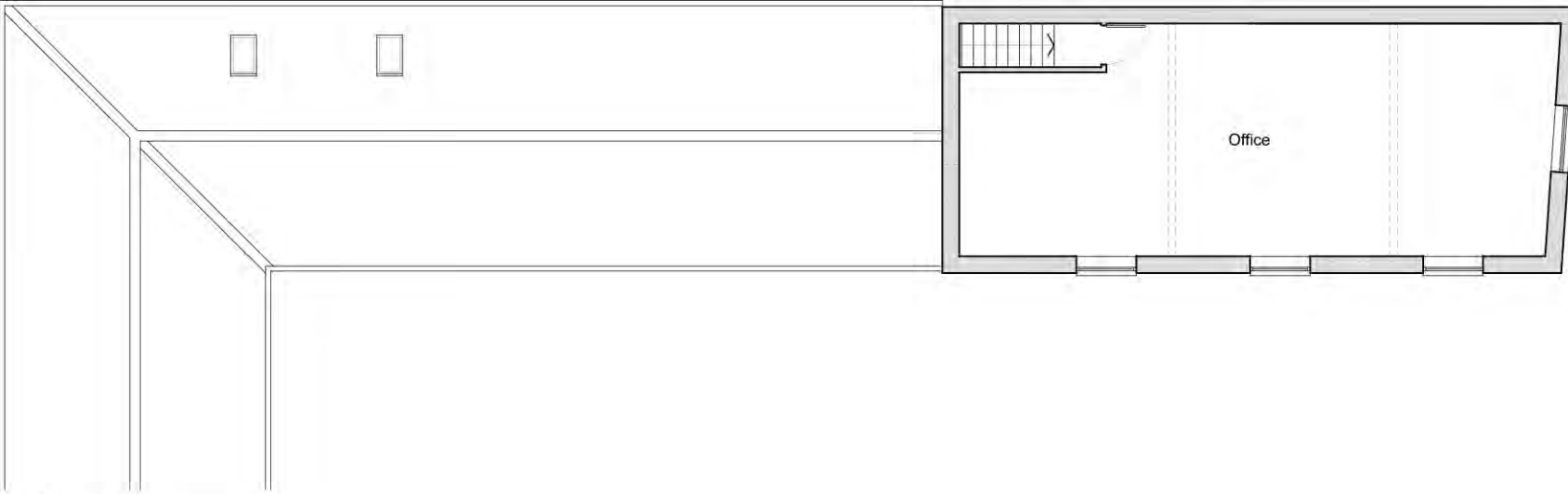
109. The proposal seeks to provide a community facility for the benefit of homeless people. The need for the Somewhere Safe to Stay centre is accepted, and the location would benefit the users as it is centrally located and well connected to the existing infrastructure supporting this vulnerable group.
110. Whilst the proposal could reduce some of the antisocial behaviour in the area if it is caused by existing rough sleepers by providing facilities such as a sleeping pod and bathroom. However, there are also concerns that the proposal would result in a rise in antisocial behaviour because the vulnerability of the future residents could become a draw for those seeking to exploit them, such as drug traffickers.

111. The concerns are mitigated by the experience of the provider, St Martins, together with the supporting information regarding how the site will be managed. The introduction of CCTV, external lighting and enhanced physical security such as electronic access would all result in enhanced security measures for the site and provide a safe environment. As proposed by the Police Architectural Liaison Officer the measures should also include alterations to the boundary fences.
112. The proposal is considered to deliver strong community benefits, which would specifically comply with DM1 and DM22, in addition to the Council's Tackling Rough Sleeping Strategy 2017-22 and Corporate Plan 2019-22. Whilst it is acknowledged that there are likely to be some negative impacts for the amenity of the existing residents, on balance this is outweighed by the social benefits of this scheme.
113. The development is in accordance with the requirements of the National Planning Policy Framework and the Development Plan, and it has been concluded that there are no material considerations that indicate it should be determined otherwise.

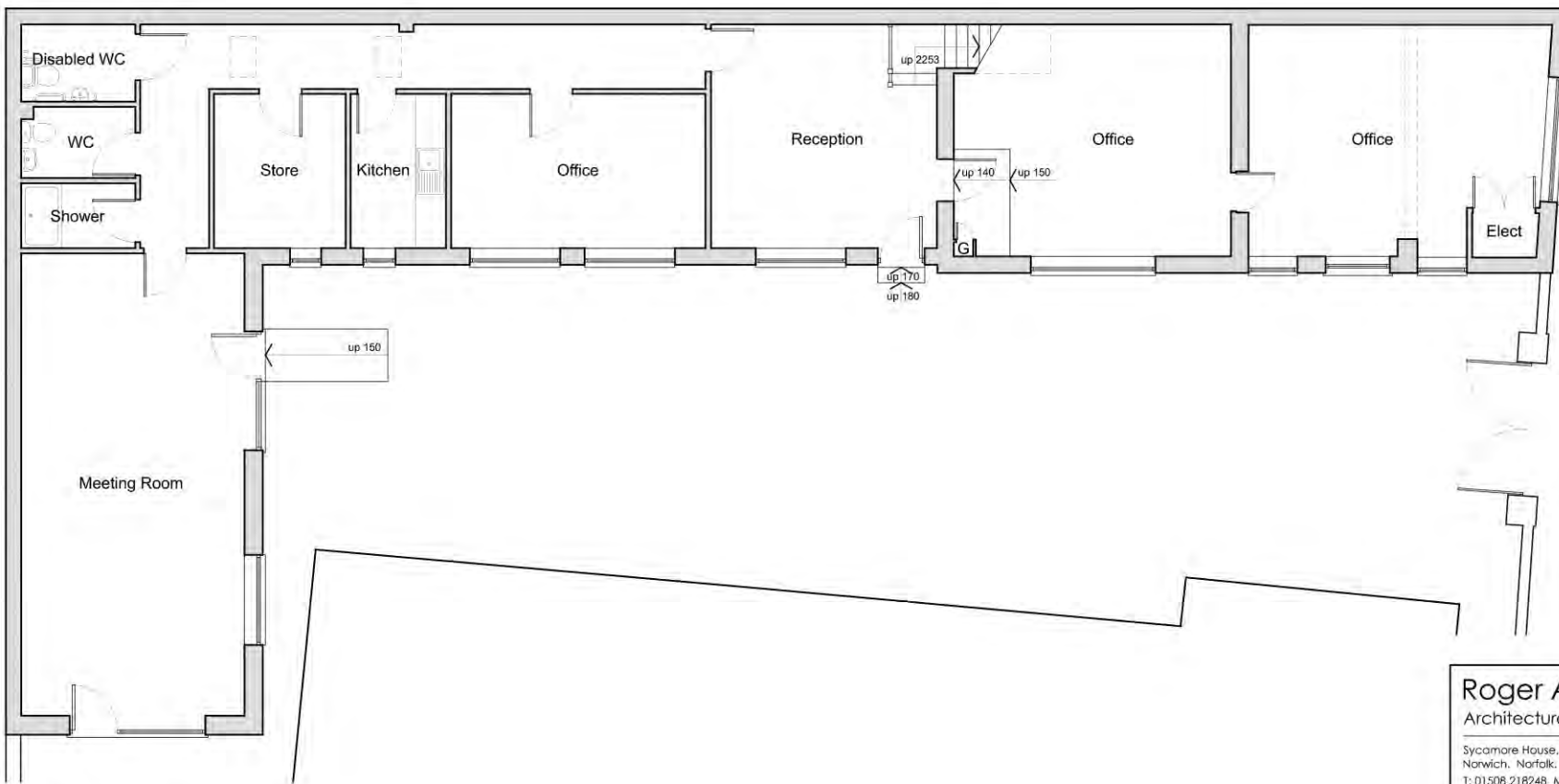
Recommendation

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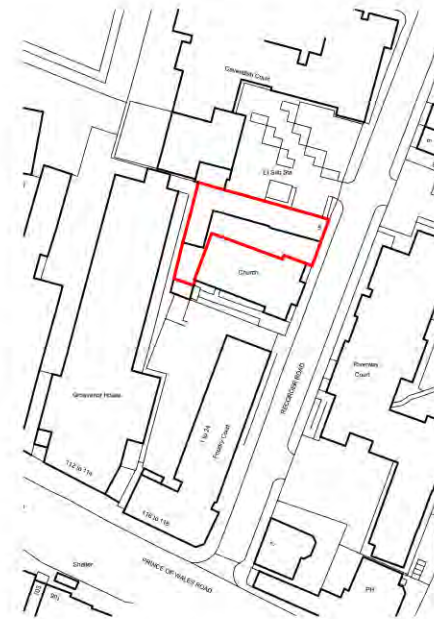
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1. Standard time limit;
 2. In accordance with plans;
 3. Provision of cycling parking/ bin storage
 4. Management Plan
 5. Details of fence
- (2) application no. 19/01014/L - 5 Recorder Road, Norwich, NR1 1NR and grant listed building consent subject to the following conditions:
1. Standard time limit;
 2. In accordance with plans;
 3. Heritage Interpretation;
 4. Listed building – making good;
 5. Localised repair;
 6. Listed building retain original fabric of building;
 7. Stop work if unidentified features revealed;
 8. Partitions;
 9. Details of windows to be submitted;
 10. Details of gate to be submitted;
 6. Details of fence;
 11. Dismantling of the window drop by hand.



First Floor Plan

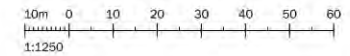


Ground Floor Plan



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Location Plan



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client:
One Planning Consultants.
project:
**5 Recorder Road, Norwich,
Norfolk, NR1 1NR.**

drawing:
Existing Plans.
scale @ A3:
1:100 & 1:1250.

drawing number:
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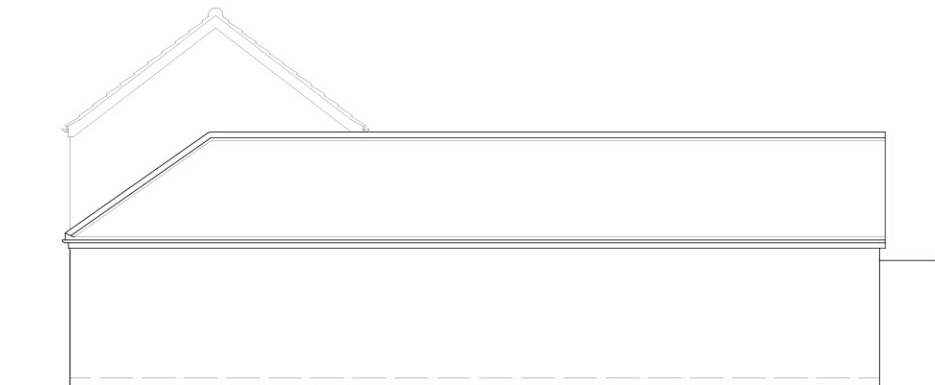
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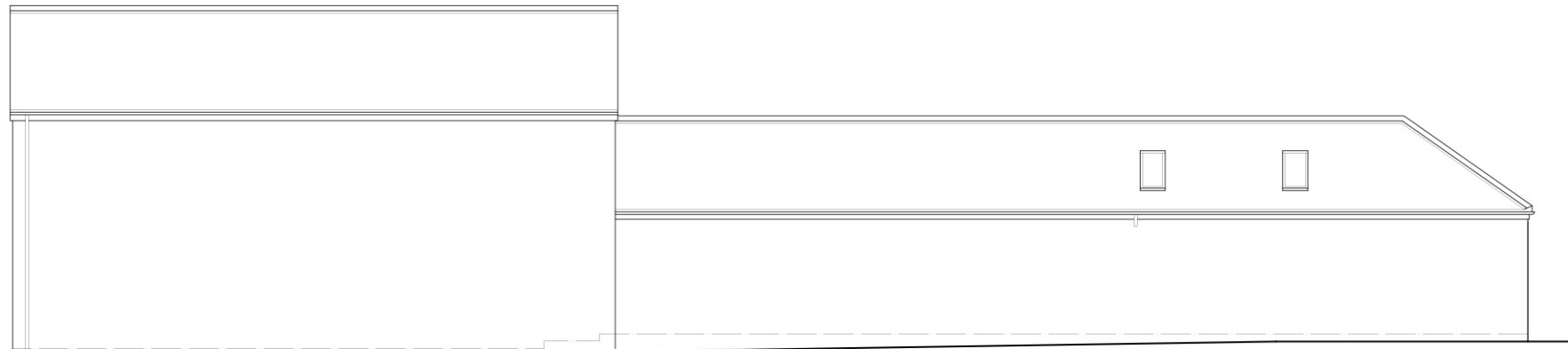
South Elevation



East Elevation to Recorder Road



West Elevation



North Elevation

revisions:

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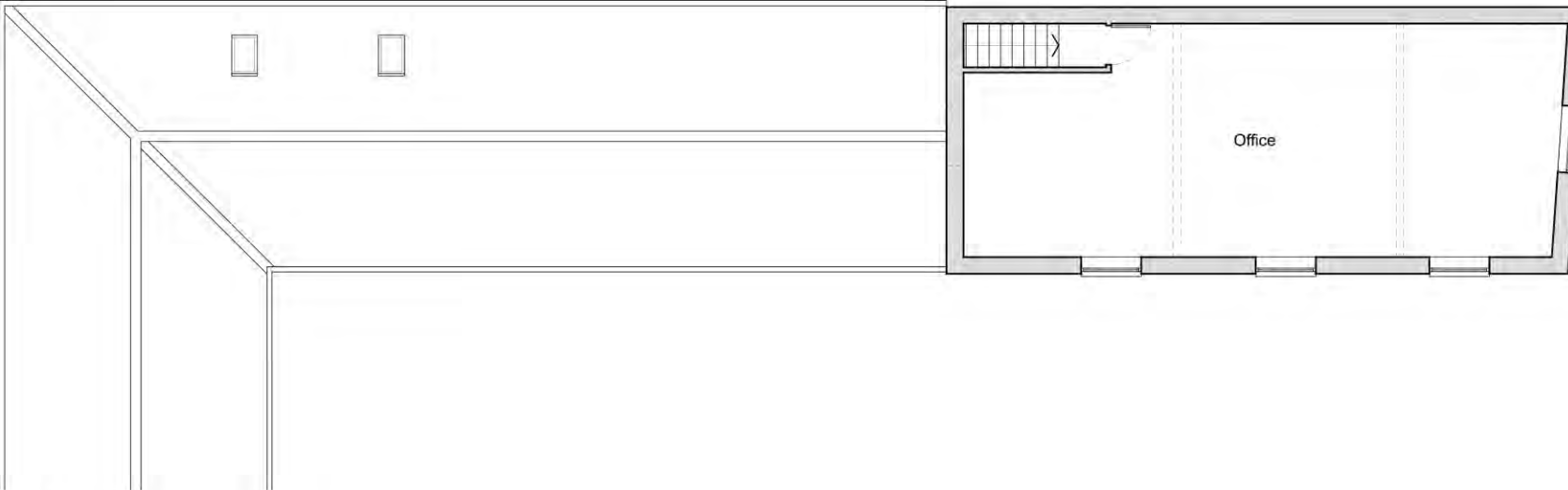
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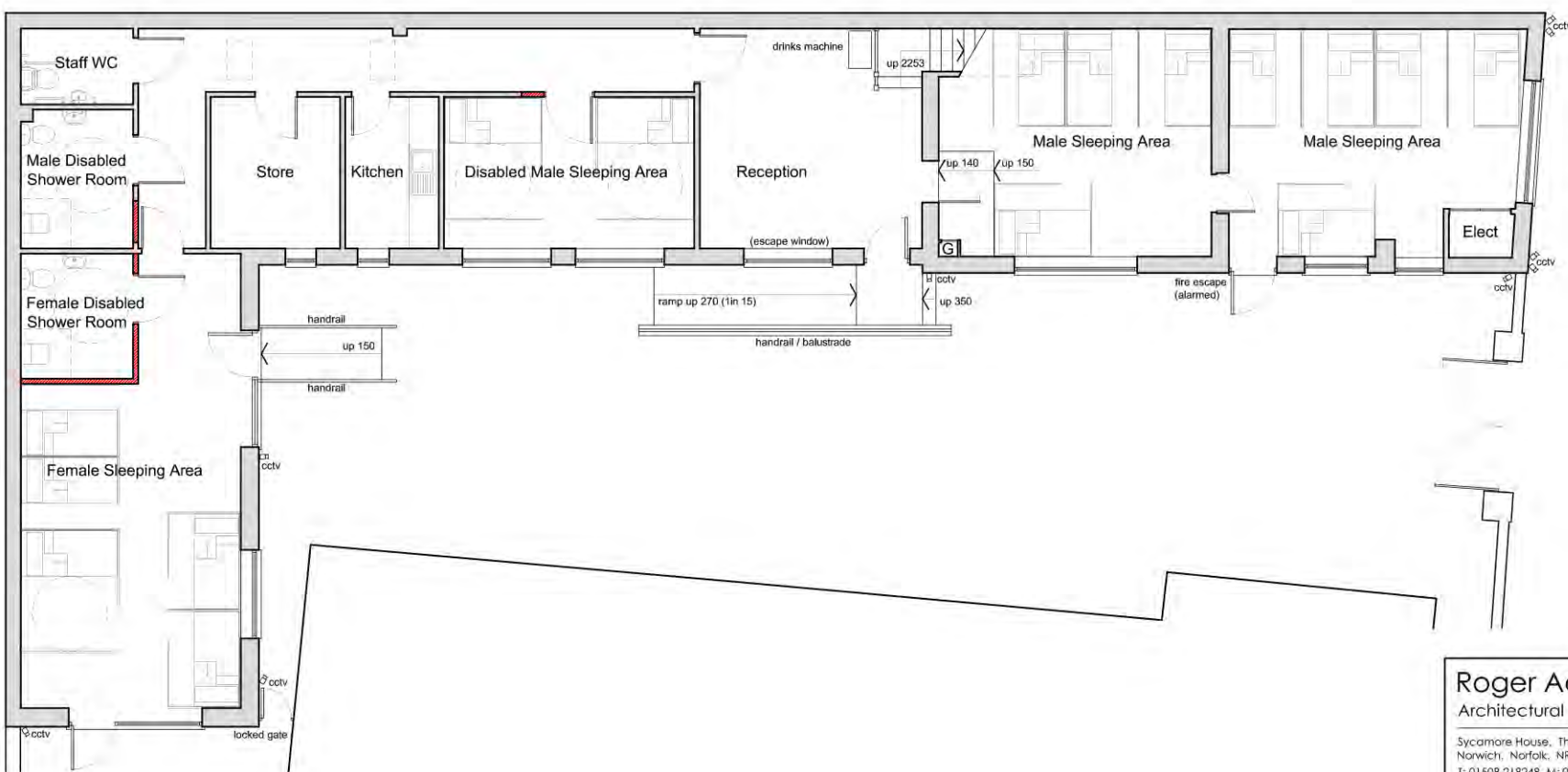
drawing:
Existing Elevations.
scale: A3:
1:100.

drawing number:
1881 - 03.

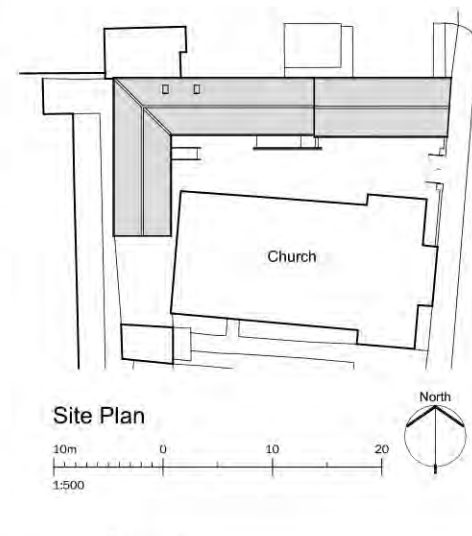
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First Floor Plan

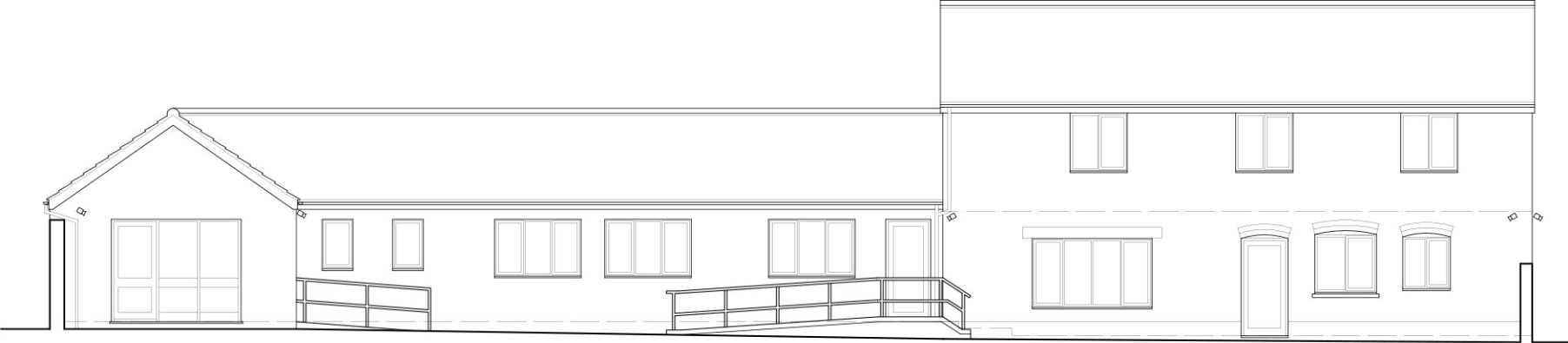


Ground Floor Plan



Site Plan

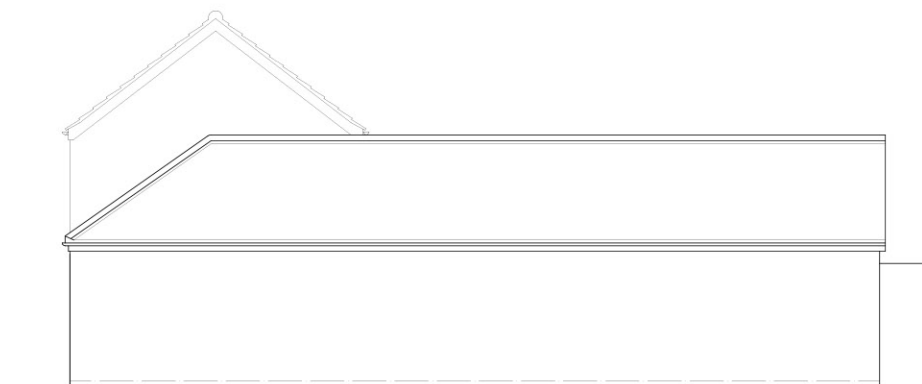
<p>revisions:</p>	
<p>Roger Adcock Architectural Design Ltd.</p>	
<p>Sycamore House, The Street, Fritton, Norwich, Norfolk, NR15 2QJ. T: 01508 218248 M: 07747 000343 E: rogeradcock@btinternet.com</p>	
<p>client: One Planning Consultants. project: 5 Recorder Road, Norwich, Norfolk, NR1 1NR. drawing: Proposed Plans. scale in A3: 1:100 & 1:500.</p>	<p>drawing number: 1881 - 03.</p>
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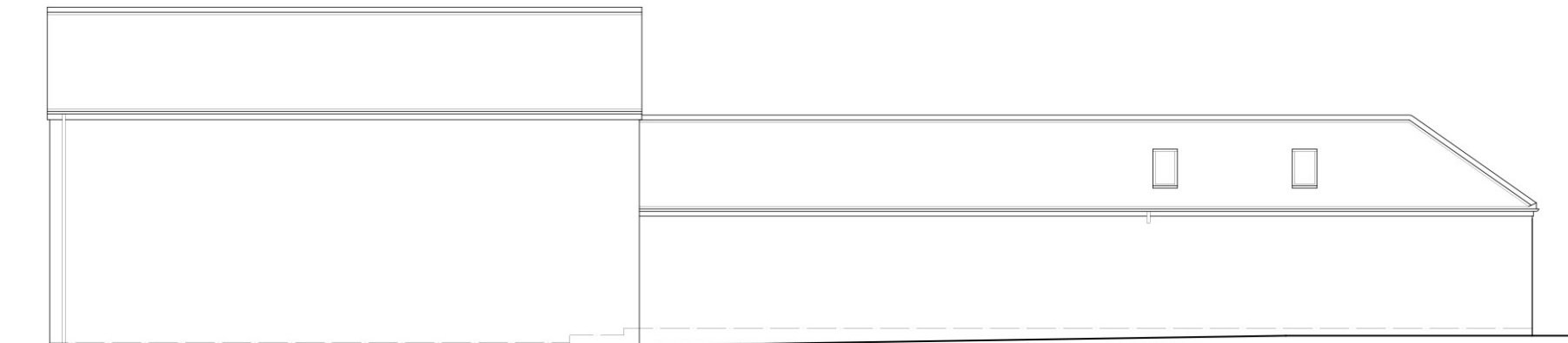
South Elevation



East Elevation to Recorder Road



West Elevation



North Elevation

revisions:

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