



NORWICH
City Council

Committee name: Planning applications

Committee date: 21/03/2024

Report title: Application no 22/00879/F Carrow Works, King Street, Norwich

Report from: Head of planning and regulatory services

OPEN PUBLIC ITEM

Purpose:

To determine:

Application no: 22/00879/F

Site Address: Carrow Works, King Street, Norwich

Decision due by: 22/05/2024

Proposal: Hybrid (Part Full/Part Outline) for the comprehensive redevelopment of Carrow Works. A full planning application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, (Use Class C3) of the Lodge, Garage and Gardener's Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625sqm of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works and an outline planning application for demolition of existing buildings and replacement with phased residential-led development up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or

Sui Generis), (total of 9,005sqm of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access.

Key considerations: Principle of development
Housing
Employment, retail and other town centre uses
Impact on European designated sites
Heritage
Design
Transport and movement
Social and economic infrastructure
Amenity
Green infrastructure, open space and landscaping
Trees
Biodiversity
Flood risk
Development viability

Ward: Lakenham

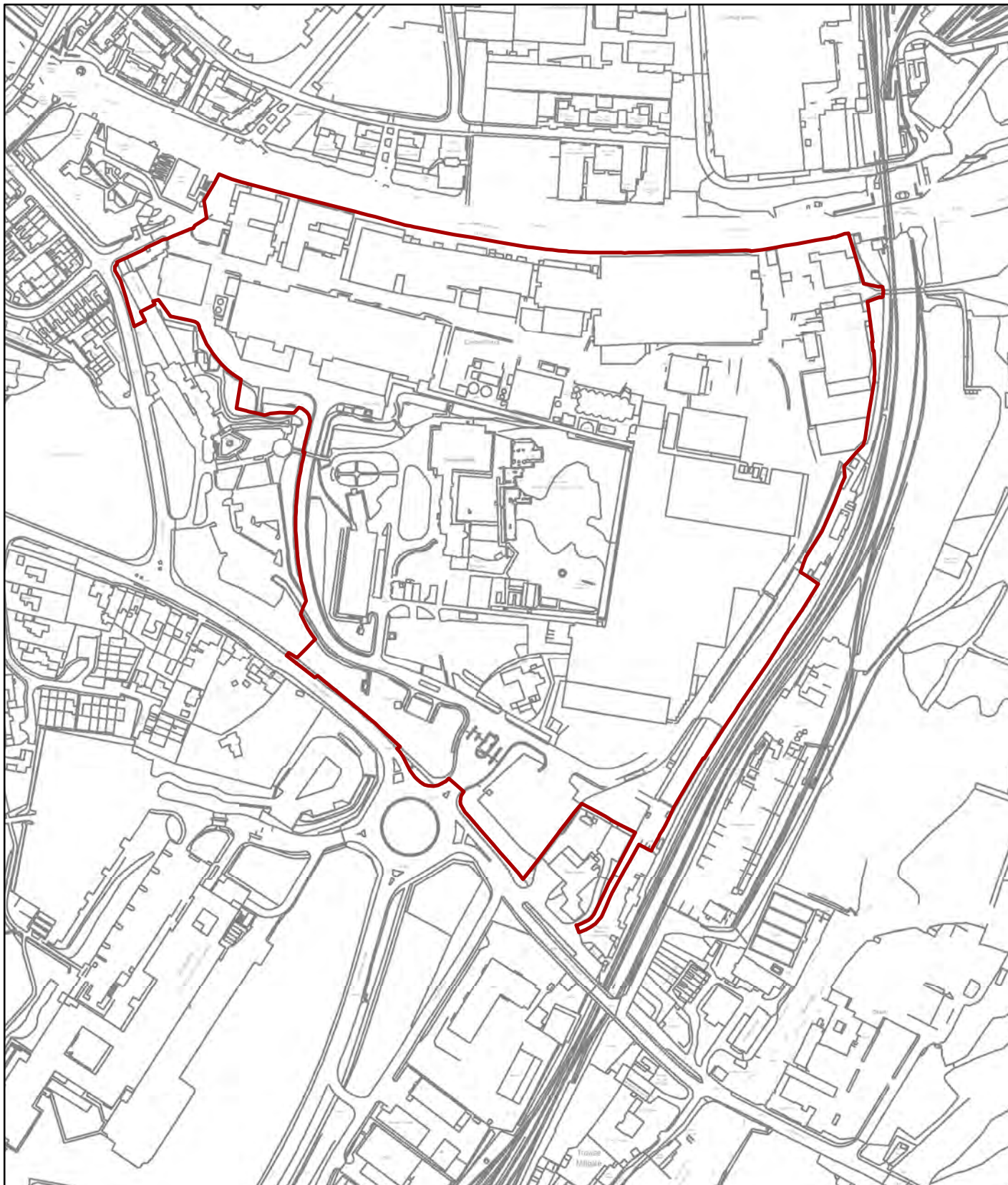
Case Officer: **Sarah Hinchcliffe**

Applicant/agent: **Fuel Properties (Norwich) Ltd**

Reason at Committee: **Major development raising issues of wider than local concern**

Recommendation:

It is recommended to refuse the application for the reasons given in the report.



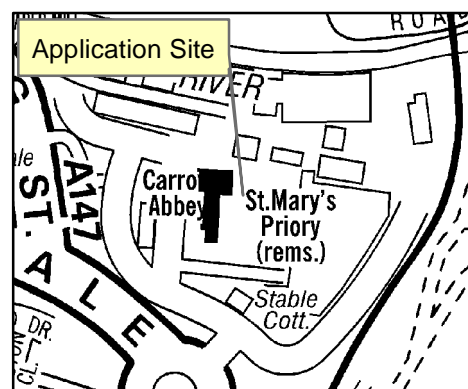
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Planning Application No 22/00879/F
 Site Address Carrow Works, King Street

Scale 1:4,000



NORWICH
 City Council
 PLANNING SERVICES



The site and surroundings

1. The application site measures approximately 16.92 hectares and is located to the southeast of the City Centre.
2. The Carrow Works site was once home to the famous Norwich manufacturer Colman's who operated from the site for over 160 years. Over recent years Colman's became part of Unilever UK Ltd who continued to use the site as a manufacturing facility and office base alongside Britvic soft drinks, together producing condiments and soft drinks at the site until 2018/19. More recently the Abbey Conference Centre also operated from the site using space within the Abbey and utilising the dining hall of the factory.
3. At the centre of the site is Carrow Abbey (grade I listed) last used as offices/conference centre. Immediately to the east of the Abbey are the remains (exposed and buried) of a Benedictine Priory (scheduled monument), located within landscaped gardens containing many trees subject to tree preservation orders. To the south and the west of the abbey are ancillary buildings (some listed and locally listed) and car parking. Attached to the northern end of the abbey is a 1960's construction, single storey dining hall (originally built for use by factory employees). To the north and east of the Abbey and gardens and located at a much lower level are a variety of industrial buildings in which the sites various manufacturing operations took place. The buildings range in age and scale from older brick-built warehouses (up to five storeys) in the northwest alongside the river (some of which are listed), to a single remaining brick chimney stack, with more modern metal framed and clad warehouse buildings to the east of the site.
4. The site is now largely vacant, although a small number of new businesses are located within the larger more modern warehouses to the east of the site, adjacent to the railway line.
5. To the north of the site is the River Wensum and beyond this on the north bank of the river are relatively new flatted residential developments (between 5 and 10 storeys high) around the Carrow Road football stadium, located off of Geoffrey Watling Way. Norwich Railway Station is less than 1 km to the north of the site.
6. To the east of the site is the main Norwich to London railway line. Trowse swing bridge takes the railway line over the River Wensum and is located adjacent to the north west corner of the site.
7. Further to the east beyond the railway line is the Deal Ground development site. This site has the benefit of an outline planning consent for up to 670 dwellings along with commercial uses. A reserved matters application for this site is currently with the local planning authority for determination. An underpass beneath the railway links the application site to the Deal Ground and is in the ownership of a third party (Network Rail). Carrow Works, the Deal Ground and May Gurney sites and the Utilities site on the north side of the River Wensum together form the East Norwich Strategic Regeneration Area (ENSRA) in the Greater Norwich Local Plan (GNLP). See map at Appendix 1.
8. To the east of the railway but further to the south is the Trowse asphalt plant operated by Tarmac and a railhead operated by Network Rail. The railhead mainly deals with the import and export of aggregates, some of which are used

by the asphalt plant, and some are transported direct from site for use in construction projects.

9. To the west of the site is Carrow House and grounds surrounded by landscaped grounds and car parking areas. The grade II and II* buildings and more modern office accommodation adjacent have had a light refurbishment in order to support temporary office use whilst redevelopment proposals are formulated for the site. This site is owned by Norwich City Council.
10. To the south of the site is the roundabout at Martineau Lane/Bracondale which provides direct access to the site and also County Hall further to the south. Bracondale (A1054) and Martineau Lane (A147) feed into the roundabout and form part of both the inner and outer ring road at this point and together provide the main route into and out of the city from the Southern Bypass and A47.

Constraints

11. There are a number of constraints associated with the site as set out below;

- Scheduled Ancient Monument (covering the area of the Abbey and Priory remains)
- Area of Main Archaeological Interest
- Bracondale Conservation Area (covering the area of Carrow Abbey and Priory and ancillary buildings in the vicinity, older buildings in the north west corner of the site and land and buildings to the west of the access drive).
- The site contains a number of statutorily and locally listed buildings as follows;
 - a) Carrow Abbey (Grade I)
 - b) Lodge, gardeners cottage and former cart shed (Grade II)
 - c) Mustard seed drying shed (Grade II)
 - d) K6 Telephone Kiosk outside entrance of former mustard seed drying shed (Grade II)
 - e) Flint wall and 19 attached pet tombs (Grade II)
 - f) Walls, steps and paved surfaces of sunken garden near Carrow Abbey (Grade II)
 - g) Eastern air raid shelter (Grade II)
 - h) Block 92 (Grade II)
 - i) Blocks 7, 7A, 8 and 8A including metal canopy attached to Block 7 (Grade II)
 - j) Stable Cottages (Locally listed)
- Listed buildings and designations on adjacent sites;

- a) Carrow House (Grade II)
 - b) Conservatory at Carrow House (Grade II*)
 - c) Trowse Railway Station (Grade II)
 - d) Late C19 engine house at Trowse Sewage Pumping Station (Grade II)
 - e) Early C20 engine house, boiler house and coal store at Trowse Sewage Pumping Station (Grade II)
 - f) Timber-drying bottle kiln *on Deal Ground* (Grade II)
 - g) Trowse Millgate Conservation Area
 - h) Crown Point Registered Park and Garden
- Carrow House and Abbey Grounds unregistered historic park and garden of local significance
 - Open space – private park and garden Carrow Abbey
 - Tree Preservation Order – numerous individual and group preservation orders
 - Employment Area – Carrow Works
 - Gateways to the City – Trowse Swing Bridge
 - Flood Zone 2 – small area in north east of the site
 - Flood Zone 3a – small area in north east of the site
 - Adjacent to city centre air quality management area (AQMA)

Relevant Planning History

12. The records held by the city council show the recent planning history for the site relates to management of the TPO trees and trees within a conservation area.

Case no	Proposal	Decision	Date
22/00540/EIA2	EIA Scoping Request for mixed use re-development at Carrow Works	EIASCR	26/05/2022

With the exception of the above submission the remainder of the planning history relates to the former employment use of the site and is not directly relevant to the development proposals.

The Proposal

13. The application proposes demolition of many of the existing buildings on the site and a mixed-use redevelopment scheme including up to 1,859 dwellings

and up to 26,630 sqm Gross Internal Area (GIA) of flexible use commercial, business, service, local community and learning floor space.

14. The entire application is submitted as a 'hybrid' planning application. The change of use of the listed buildings and provision of public spaces and public realm along the main site access road, along with establishing principal means of access are parts of the application for consideration in 'detail'. In addition demolition works to the dining hall and construction of 9 new dwellings in its place and extensions to building 209 (an unlisted non-designated heritage asset located along the riverside) are physical works proposed, with the remainder of the development proposals submitted in 'outline'.
15. The outline part of the planning application, with some matters reserved includes consideration of the principle of relevant demolition of unlisted buildings in a conservation area and their replacement with a residential led mixed-use development. The outline planning application is supported by a series of Parameter Plans, including the Hybrid Planning Application Boundaries, Demolition, Land Use, Open Space, Building Heights and Access and Movement plans.
16. In addition, in relation to both the full and outline components of the hybrid planning application, the proposal is the subject of an overall indicative masterplan and a Design Code and Design and Access Statement, which defines a series of character areas across the outline component of the site.
17. There are numerous supporting technical reports and as the application has previously been identified as Environmental Impact Assessment (EIA) development for which a requirement of the submission is the provision of an Environmental Statement (ES).
18. Despite attempts to secure such information to form a valid submission, there are currently no associated listed building consent applications with the local planning authority for works to the listed buildings which form the full/detailed part of the planning application submission.
19. It is also understood that some of the works proposed will require Scheduled Monument Consent from the Department for Digital, Culture, Media and Sport (DCMS), via a process where Historic England provide advice to the government. At this time, it is understood that no such submission is with the relevant authority for determination.
20. The planning application has been with the local planning authority for some time. The initial submission was made in July 2022 and remained invalid due to awaiting further information to allow consultation and consideration of the application to begin. After a significant period in which attempts were made to engage with the applicant to understand the delays, the outstanding documentation was provided, and the application was validated in August 2023 (just over 1 year later). The application has been considered in the extremely disappointing context that since its initial submission the applicant and their project team have not been in a position to discuss, negotiate or amend their proposals in any way. This situation is reflected in the significant number of objections and comments of concern from a large number of the consultees as summarised in the 'statutory and non-statutory consultees' section from paragraph 30 onwards.

21. As progress on this matter remains lacking, a decision has been made by the Head of Planning and Regulatory Services to present the application to members for consideration.
22. The content of the report therefore reflects this unusual, extremely unfortunate and disappointing situation and highlights areas where information is absent or deficient. The report should also be considered in the context that due to the passage of time some of the technical reports may not reflect an up-to-date position with regards to the site and surrounding baseline or relevant guidance and legislation.

Summary of Proposal – Key facts:

23. The key facts of the proposal are summarised in the tables below. Note that the quantum of development stated are maximum figures and indicative in respect of the outline elements of the proposal.

Scale	Key Facts
Residential	
Total no. of dwellings	1,859
No. of dwellings (Full)	Up to 143 units.
No. of dwellings (Outline)	Up to 1,716 units
No. of affordable dwellings	Nil
No. of dwellings meeting Part M4(2) Accessible and Adaptable Dwellings	Suggests an aim to achieve 20%
Commercial	
Total amount of commercial floor space	26,630 sqm (GIA)
Commercial floorspace (Full)	17,625 sqm
Commercial floorspace (Outline)	9,005 sqm

Appearance	Key Facts
No. of storeys	Height parameters range between 1 and 14 storeys. Areas of greatest height along River Wensum.
Principal materials	Buff brick, grey brick, red multi brick, metal cladding

Transport Matters	Key Facts
Vehicular access	From Martineau Lane/Bracondale roundabout and new access from Bracondale.
Pedestrian and cycle access	As above and also via Papermill Yard and King Street and Bracondale adjacent to Carrow Fire Station. Note Also suggested access via a new bridge link over the River Wensum and via an underpass beneath the railway to the adjacent Deal Ground, although arrangements for such are not confirmed.

	Use of an existing pedestrian bridge access to Carrow House site (subject to agreement with adjacent landowner, not confirmed).
No of car parking spaces	734
No of cycle parking spaces	Suggest will be in accordance with development plan policy.

Indicative dwelling mix from planning statement – 72% apartments – 28% houses

	Apartments – Private sale	Apartments – Build for Rent	Houses	TBC
1 bedroom	355	217	1	
2 bedroom	540	227	78	
3 bedroom			267	
4 bedroom			30	
5 bedroom			7	
TBC			12	125
	895	444	395	125

**table below suggest the TBC element has been assigned to flats*

Indicative dwelling mix – from viability report

	Flats	Houses	Total
1 bedroom	618		618
2 bedroom	846	78	924
3 bedroom		283	283
4 bedroom		29	29
5 bedroom		5	5
Total	1,464 (79%)	395 (21%)	1,859

Detailed element

24. The full planning application relates to an area covering 5.02 hectares (approximately 30% of the total site area). The description relating to the detailed element of the proposals is as follows;

“full application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, up to (Use Class C3) of the Lodge, Garage and Gardener’s Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625 sq.m of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works”.

25. The main elements are summarised below;

- Access and the main internal estate road and public spaces and public realm.
 - a) the existing access from the roundabout at the junction of Martineau Lane and Bracondale is to be retained and modified.
 - b) a new point of access is proposed on to Bracondale
 - c) emergency access from the southeast corner of the site emerges onto Bracondale adjacent to Carrow Fire Station.
 - d) existing access road around the development is to be retained and upgraded to an adoptable standard, (although will likely remain unadopted by the highway authority),
- Conversion works and change of use of Carrow Abbey (grade I listed) to 3 residential dwellings,
- Conversion works and change of use of the Lodge, Garage and Gardener's Cottage (grade II listed) to 3 residential dwellings,
- Conversion works and change of use of Stable Cottages (locally listed) to residential use,
- Demolition of the former dining hall and construction of 9 new residential dwellings,
- Adaptation and conversion of buildings 92, 7, 7a, 8 and 8a, 35 (mustard seed drying shed) (all grade II listed) for flexible uses to include;
 - a) Business and commercial, hotel or, dwellinghouses.
- Adaptation and conversion of buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35 and the chimney for flexible uses to include;
 - a) Business and commercial, hotel, residential institution, dwellinghouse, learning and non-residential institutions, local community uses, general industrial, storage and distribution or sui generis uses.
 - b) Proposed plans for building 209 include substantial extensions, including the provision of additional storeys.
- Adaptation and conversion of the retained workshop (Block 258) for flexible uses to include;
 - i. Business and commercial, general industrial, storage and distribution or sui generis uses.
- In total providing 143 residential units and/or 17,625 sqm of flexible commercial business, service and local community and learning floorspace.

Outline element

26. The outline planning application relates to an area covering 11.9 hectares. The description relating to the detailed element of the proposals is as follows;

“demolition of existing buildings and replacement with phased residential-led development up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or Sui Generis), (total of 9,005sqm of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access”.

27. More concisely this includes an indicative mix of;

- 395 market houses,
- 895 market apartments,
- 444 build to rent apartments,
- 125 TBC (assumed apartments),
- 9,005 sqm (GIA) flexibles uses to include; Business and commercial, hotel, residential institution, learning and non-residential institutions, local community uses, general industrial, storage and distribution uses.

Representations

28. Adjacent and neighbouring properties have been notified in writing. 3 letters of representation have been received citing the issues as summarised in the table below:

Issues raised	Response
The proposed heights of buildings are imposing and out of character.	See main issues 5 and 6 in relation to consideration of building heights and heritage impacts.
The application does not comply with the East Norwich masterplan requirement for a direct cycle route east to west through the site.	See main issue 7. Although provision is made for an east to west route through the site the detail of its arrangement and design still needs to be discussed.
A bridge across the River Wensum to allow safe and direct access to the city centre should be provided.	Agree. See main issue 7.
A bridge over the River Yare is needed to provide safe access to Whitlingham Country Park.	Agree. See main issue 7.
Improvements to the underpass must be made to allow for a walking and cycling route under the railway.	Agree. See main issue 7.
There will be a significant increase in traffic on the outer ring road.	See main issue 7. There remain outstanding issues with the detailed content of the Transport Assessment.
Road junctions surrounding the site are dangerous for cyclists. Safe and segregated cycle routes through the site are required.	See main issue 7. There remain outstanding issues with the detailed content of the Transport Assessment and the mitigation measures required.

Consultation responses

29. 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.

Statutory and non-statutory consultees

Active Travel England

30. A large amount of further information is required. A comprehensive Transport Assessment (TA) and Travel Plan which incorporates a definitive walking and cycling strategy should be submitted. Currently the trip forecasts in the submitted TA do not represent a sound basis upon which to forecast the needs for active and sustainable travel, nor do they demonstrate a commitment to improving and enhancing active travel networks that serve the site. The TA and Travel Plan should identify infrastructure to be provided which enhances the accessibility of the site.
31. It is strongly recommended that the Local Planning Authority consider requiring that the number of vehicular parking spaces is significantly reduced.
32. It is noted that the site is located very close to Carrow Road (Norwich City FC) which frequently attracts between 25-30,000 supporters during the football season. Regardless of whether the internal roads are privately managed or adopted by the highway authority, it is considered that unless restrictive parking measures are implemented through a Controlled Parking Zone (CPZ) or other privately managed residents only parking restriction, the site, and its internal streets could become an attractive parking opportunity for spectator overspill parking, generating obstructions to active travel routes, crossing points, and causing hazards and inconvenience to walkers, wheelers, and cyclists.
33. The number of both long-stay and short-stay cycle parking facilities needs to act as a suitable encouragement to shift to active and sustainable modes. Suggested cycle parking provision:
- 3,346 long stay cycle parking spaces (total number of bedrooms – one space per bedroom).
 - 133 – 266 long term cycle spaces for associated uses (26,630m² of flexible range of uses – precise number of spaces to be calculated by the applicant in future submissions).
 - Up to 266 short term spaces for above mixed-uses.
34. It is crucial that the development proposals align with the strategies set out in the Greater Norwich LCWIP, in support of Norfolk County Council's ambition to make Norfolk a walking and cycling county where walking and cycling are the natural choice for all types of users for both travel and leisure in both rural and urban areas. Therefore, this applicant must demonstrate an absolute commitment to the expansion of active travel routes.

Ancient Monuments Society (Historic Buildings and Places)

35. Object to the construction of nine new units on the site of the dining room. The fact that there have been past changes and a building in this location should not be taken as justification for further accretions which would continue to erode and encroach on the setting of Carrow Abbey and Carrow Priory.
36. Concern about the apparent division of the garden to the east of the Abbey for what appears to be individual private gardens. The subdivision would interrupt this connection, both visually and physically, again adding further harm to the setting and historic interest of both structures.

Anglian Water (AW)

37. No objection subject to imposition of conditions. Confirm that there are AW assets within and close to the site. In relation to wastewater treatment, they indicate the foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have available capacity for these flows. Conditions are recommended regarding on-site drainage and surface water disposal.

Broads Authority

38. Some concerns relating to the proposed building heights of 8-11 storeys along most of the river frontage. This is a substantial increase in height and although the historic character was described as canyon-like in the conservation area, that was describing buildings of five storeys. We would therefore suggest that further consideration is given to this scale.
39. Also suggest that there should be some variety in the river-facing elevation in terms of heights and roofscape. We also have concern relating to the 11-14 storey block at the eastern end of the site, where its relationship to the more rural areas to the east needs to be considered as much as its relationship to the built form of the city.
40. In terms of landscaping, it is beneficial that a riverside walk is being proposed and that there will be pedestrian and cycle links into the neighbouring Paper Mill Yard site to the west. We suggest that it would be positive if both the landscape scheme and building design, particularly along the sensitive river frontage, could aim to reflect and retain something of the site's industrial heritage.

Broads Society

41. Generally supports the principle of the redevelopment of the Carrow Works site, especially the retention of the important historic and heritage assets of the site. However, there are some strong reservations about the scale and form of the indicative residential blocks fronting the river in the outline part of the application. It is anticipated that, if developed in the form indicated, that the proposed residential blocks will have a very dominant and shadowing effect over both the river and the green space proposed between the built form and the river.
42. There is also considerable concern about the limited amount of open and landscaped space between the buildings fronting the river and the river's edge.

Cadent Gas

43. No objection in principle from a planning perspective. Informative note required.

Design and Conservation (Norwich City Council)

44. The tangible and intangible cultural heritage comprising the site are significant factors which should be some of the primary considerations for any development proposals within the application area.
45. The principle of creating a distinctive, sustainable and heritage-led development, and the opportunity to open up this historically significant part of the city to the public is strongly supported. However, the proposed development is believed to cause a high level of harm to the significance of designated heritage assets and their setting. The proposed subdivision of Carrow Abbey and its grounds, and introduction of residential development over the ruins of Priory church would affect the evidential, historic and communal values of the monument and Abbey, and their strong interconnectedness. The accumulated harm on the significance of designated heritage assets (including the scheduled monument, grade I listed Abbey) and their setting is considered to be at the upper end of less than substantial harm.
46. Paragraph 203 of the NPPF highlights the importance of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Based on the submitted information and potential level of harm, it is hard to justify that the proposal presents the optimum viable use for the grade I listed Abbey and its immediate setting considering the necessary changes that are suggested to accommodate the proposed use. It is important to ensure that the viability of the use is considered for the future conservation of the asset, as well as its economic benefits. The submitted Technical Appendix 14.1 fails to justify why the proposed development (encompassing subdivision of the Abbey into separate units, associated internal and external works, including additional residential development over the ruins of the Priory church) is suggested as the optimum viable use for the future of this significant historic site.
47. The scheme cannot be supported on conservation and design grounds as the range and character of interventions raise significant concerns regarding the viability of the proposed use within this historic setting. Paragraph 208 of the NPPF says 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.*' The proposal would negatively impact the significance of designated heritage assets and their setting, and the way they are perceived and experienced. It is recommended that options are reviewed where other uses are considered so that the Carrow Priory and Abbey, alongside ancillary buildings are preserved and re-used in a manner consistent with their significance and conservation.
48. Paragraph 212 of the NPPF says that Local Planning Authorities 'should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.' It further advises that proposals preserving 'those

elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

49. There are concerns on the wider heritage impact of proposed interventions, including development's heights and footprint, street scene, transitions between character areas, and a more detailed scheme proposal would be necessary for the listed buildings located at the north-west area of the site.
50. The group value of heritage assets within the site boundaries, and the integration of their interconnection within the network of new development should be further explored. It is recommended that the integration of this previously enclosed application site to the city's public realm should explore the adaptation of the site to the wider historic city context and infrastructure.
51. At this stage there are significant concerns, and a review of the scheme is recommended.

Ecology (Norwich City Council)

52. The PEA is an initial ecology report with good advice and recommendations. However, it does not provide sufficient information to enable an assessment of the potential ecological impacts of the development proposals. It does not provide enough evidence to assess the likely negative effects on protected species and does not include an assessment of biodiversity net loss/gain. Further surveys, and ecological assessment are required along with a Construction Environmental Management Plan and Biodiversity impact Assessment.

Emergency Planning

53. No further questions or issues with the development progressing.
54. The Flood Risk Assessment is comprehensive and has identified all forms of flood risk and recommended specific mitigating actions including raising the ground levels at most at risk sections of the development.

Environmental Protection (Norwich City Council)

55. Objection. The details within this report are lacking with regarding the noise impacts on the proposed residents, there is insufficient information/evidence that the operation of the rail head and the tarmac site adjacent would not impact on the residential amenity of the proposed residential development.
56. Objection, due to insufficient information. Due to the scale of the development, there is the potential for significant adverse effects to arise from the development in regard to air quality. The operation of the aggregate railhead and Tarmac plant on the adjacent site to the east should be considered under the key issues section, as should any additional pollution sources which may be introduced as a result of any new employment aspects of the development which could affect NO₂ or particulate levels and emissions of pollutants from all construction plant. Consideration also needs to be given to cumulative air quality impacts.
57. Access into some areas of the site was restricted due to buildings, roads and services. It is recommended that once structures have been demolished and

hard standing removed, formation inspections and further intrusive investigations (trial pits) are undertaken. Following the additional investigations, remediation strategies to mitigate risks to the proposed development from identified contamination may need to be prepared.

58. As there is not a full account of the contamination on site a full contaminated land condition is required to ensure that the pollutants and contamination pathways have been fully considered to enable the site to effectively be remediated.

59. Various planning conditions would be required concerning ground contamination, lighting and demolition.

Environment Agency

60. The Flood Risk Assessment (FRA) has not demonstrated that compensatory flood storage can be provided on the site and has not followed the Sequential Approach

61. The FRA has amended our Norwich 2017 modelling, but it has not been submitted for review by our modelling team to ascertain whether it is accurate and fit for purpose.

62. The FRA has not confirmed whether they propose land raising and development within Flood Zone 3b.

The Gardens Trust and Norfolk Gardens Trust

63. While the principal of redevelopment on this site is supported, there are strong objections to some aspects.

64. Strongly objects to the provision of housing development, associated curtilages and car parking in what is described as the Abbey Grounds part of the site. These elements would be close to the Abbey buildings and the remains of the Abbey, resulting in an adverse effect on their settings. To fully respect the heritage assets in this part of the Carrow site it should instead be used as an open park, enlarging the Abbey Gardens. This would both improve the setting of the Abbey and be a major benefit to new residents and the wider public.

65. The proposed housing immediately to the north of the Abbey buildings is not appropriate. While it would replace the modern dining hall, it would be too close to the Abbey remains and have an adverse effect on their setting. These buildings would, in part, be on the site of the nave of the former priory church. The foundations of the dining room were designed to avoid harm to the archaeological remains of the church. This redevelopment provides a unique opportunity to reclaim the site of this key building in the area's historic development. This area should remain undeveloped as part of the park referred to above, with appropriate interpretation to further public understanding of this highly important site.

66. The sub-division of the Abbey buildings would require the provision of garden areas for the proposed houses, resulting in sub-division of the area of the Scheduled Ancient Monument. The Heritage section of the Environmental Assessment acknowledges that this would be harmful to the Abbey site. The Trust shares that conclusion and objects to this part of the proposals. A

community use for the Abbey buildings would obviate the need for domestic gardens. Extensive housing development is also proposed to the east of the Abbey grounds. Careful control of its height will be needed to avoid harm to views from within the grounds.

67. This is a hybrid application, part outline and part detailed. Given the great importance of the heritage assets at Carrow, the Trust does not consider an outline application to be appropriate for any elements of the development which would affect those assets.

Health and Safety Executive

68. The proposed development site does not currently lie within the consultation distance (CD) of a major hazard site or major accident hazard pipeline.
69. **Comments relating to building 209 (9 storeys 30.17m).** There is currently insufficient fire safety information to enable HSE to make a full comment. Further information is required relating to the fire service site plan and the proposed plans for the basement of the building.
70. Further comments relate to fire hazards associated with habitat or green roofs and electric vehicle/cycle storage safety considerations.

Highway authority (Norfolk County Council)

71. The Highway Authority is supportive in principle of sustainable development at the former Colman Works site. However, unfortunately the Transport Assessment (TA) provided with the application in the opinion of the highway authority is deficient in a substantial number of areas. It fails to demonstrate an acceptable access strategy, justify development trips, provide full traffic flow diagrams, assess development impact, identify appropriate off-site highway mitigation. The Transport Assessment also includes assumptions based upon delivery of infrastructure that is dependent on third party land.
72. The provided Transport Assessment fails to demonstrate that the highway network would continue to operate safely without severe residual cumulative impact. The Highway Authority would therefore in accordance with NPPF paragraph 115 recommend refusal of the application.

Historic England

73. Objects to the application on heritage grounds because of the high level of harm that would be caused to the significance of the scheduled monument, grade I listed Carrow Abbey and other listed buildings on the site.
74. We have serious concerns about the proposal to replace the dining room with residential dwellings. Any new-build structures on the floor slab of the dining hall would have an adverse impact on the setting of the scheduled monument and cause harm to its significance.
75. The subdivision of Carrow Abbey would mean the building could no longer be appreciated as a single property. Much of the Abbey's architectural and historic interest lies in the high survival of late Victorian and Edwardian fabric and the plan form. The division of the house would limit the ability to appreciate its plan

form and the quality of the rooms and fabric which collectively illustrate a high-status domestic property of this period.

76. The proposed extension at the northern end of the Abbey would harm the significance of the building. It is higher than the existing link at two storeys and would obscure more of the exceptional flint work identified in the Design and Access Statement.
77. The proposed development in the area between the historic ancillary buildings on the approach to the Abbey would harm its significance and that of the monument. Carrow Abbey was designed as a home for the Colman's within a garden setting. While the garden setting has been eroded by car parking in this area it has remained open. This also allows for a visual connection between these buildings and Abbey House and contributes to the significance of the buildings.
78. The visibility of the taller new buildings within the Abbey site would harm its secluded and domestic character.
79. A three storey roof top addition is proposed to building 209 on the water front. Taller new buildings here could detract from the significance of the historic industrial buildings.

Development strategy (Norwich City Council)

80. The development strategy team are keen to see the redevelopment of this large brownfield site, however, have some concerns relating to the current proposals which would lead to our objection on 2 grounds:

Affordable Housing

81. The site area and the proposed number of dwellings triggers the thresholds of the Council's affordable housing (AH) policy. All developments are expected to deliver this policy requirement unless an acceptable independent review of viability determines that it is not viable to deliver the full quota.
82. The Greater Norwich Local Plan (GNLP), has a requirement for 33% affordable housing currently going through the formal process of adoption by each of the Local authorities. It is anticipated that adoption will be completed by the end of March 2024.
83. The tenure of affordable housing is determined by the 2021 Local Housing Needs Assessment and shows a requirement for 65% affordable housing for rent and 35% for low-cost home ownership (shared ownership, shared equity, or any other intermediate product)
84. In this instance 613 units of affordable housing would be required. 399 affordable housing for rented and 122 low-cost home ownership.
85. It is very disappointing to see that the applicant is not proposing to deliver any AH on the grounds of viability, and we would therefore object to the application on this ground.
86. In our opinion a development of this scale would need to provide a level of affordable housing in order to deliver a mixed and balanced community. A review of viability has been provided by the applicant that indicates the scheme

would not support affordable housing, but in order to fully assess this we would expect an independent review of this and consideration of potential grant funding that could improve the viability.

87. If, as a result of the independent review of viability, AH is deliverable, it should be secured by a S106 agreement. It should be of tenure neutral design and should be integrated into residential layouts to provide a distribution of single units or small groups rather than in one large group. In Norwich there is a high need AH, particularly 1-bedroom 2-person flats, 2-bedroom 4-person houses and 4+bedroom houses. If it is deemed that any AH is viable, I would suggest further discussions are held to determine the size and locations of the units.

Housing Mix

- The annual housing need across Norwich, as determined by the LHNA, is for 593 homes of which 25% would be apartments and 75% houses.
 - It is recognised, due to the nature of the development and existing buildings that there will be a requirement for a higher density scheme on Carrow Works.
 - In our opinion, however, the current property mix is not reflective of either the housing need or the masterplan for the development and proposes only 21% houses and 79% apartments.
 - The masterplan shows a range of heights across the development with high rise up to 11 storeys to the North but lower density of 2-3 storey to the South and East of the site.
88. Recognising that the application is a hybrid application further detail will be required on the accommodation schedule in order to ascertain whether the proposed dwellings meet the Nationally Described Space Standards size requirements.
89. Whilst there is some communal outdoor space, it would be good to see some private outdoor space and/or balconies for use by the residents.
90. The energy strategy indicates that passive design measures, well insulated and airtight building fabric (Future Homes Standard as a minimum) and proposes to utilise measures such as PV, solar thermal and heat pumps which is welcomed.
91. The site is within reasonable proximity of the shopping centre at the Riverside Retail Park which provides a range of shops including a supermarket, and it is not far from Whitlingham Country Park which provides recreational facilities. It is a short bus journey to the centre of Norwich where there is a full range of amenities and educational facilities.

Landscape (Norwich City Council)

92. Holding objection on landscape for the site based on a general lack of coherent approach to the landscape strategy. Whilst some of the individual elements and approaches to different character areas might be justified, it is difficult even within the design code to understand if a strong coherent design thread is provided across the entire development area.
93. There are several areas which would benefit from being included as a full application, this is the case where access, links and open space should be

strongly aligned in terms of strategy and more detail needs to be demonstrated in order to understand how realistic the ideas presented are. This is particularly the case where there are level differences to overcome. If connections are not possible it would really undermine the ability for this site to connect to its surrounding both physically and in terms of character and sense of place. Applications relating to nearby sites (Deal Ground and Tarmac depot) also need consideration in terms of wider links.

94. In landscape terms, what this site requires is a strong approach which protects existing features and works them into a usable public landscape framework, combined with a strong access strategy. The potential pressures that would be placed on both onsite and offsite/nearby landscapes (including protected/designated sites) needs consideration. The approach to providing adequate onsite GI and recreation space should be fully justified.

95. Initial points of detail around a number of elements of the proposals. Including;

- a secondary access is proposed from Bracondale which would require removal of existing mature trees, and attractive flint boundary wall, and would interrupt the existing cycle/footpath. This would have adverse landscape and visual effects causing harm to the Bracondale Conservation area and would reduce the accessibility of the cycle/ped facility, which is unlikely to be acceptable in landscape terms without adequate mitigation.
- The riverside walk needs to follow the frontage of building F (Block 7/8) to avoid a lengthy diversion around three sides of the block in order to return to the riverside walk. Options seem to be either a cantilevered walkway or a route through the building.

Lead Local Flood Authority (Norfolk County Council)

96. In consideration of the sequential test, sequential testing does not consider it acceptable for residential properties in the 'more vulnerable' or 'highly vulnerable' class to be built in Flood Zone 3b. In addition, as the applicant has not secured suitable flood storage compensation within the redline boundary of the site, it would not be possible to raise the ground levels in the area of the site in Flood Zone 3 to enable development on this land without increasing flood risk on site or elsewhere. No exception test has been undertaken for this area of the development in accordance with NPPF.

97. The applicant will need to assess the existing attenuation capacity on site and ensure that the proposed development does not increase flood risk elsewhere through not considering this matter thoroughly.

98. There is a lack of consideration of the surface water connectivity between the Carrow Works site and the land to the east of the railway line through the underpass. At present, the surface water mapping (which is based upon ground level mapping) indicates there is the potential for water to pass through the underpass. This could also be a potential route for water during fluvial flooding, which has also not been assessed or considered despite the evidence indicating its potential.

99. There has been very limited consideration of sustainable drainage systems and the reporting of reusing existing infrastructure that is not even confirmed as operable let alone viable is inappropriate. The use of a controlled discharge

rate limited to a 1% AEP greenfield runoff rate implies the proposed use of a complex control system yet there is no consideration of where the long term storage will be provided on site for each of the affected networks.

100. Further detailed critique around specific elements of the Flood Risk Assessment and Drainage Strategy are contained within the full comments available to view on the council's website.

Natural England

101. Further information required to determine impacts on designated sites and protected landscapes.

102. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

103. The following information is required:

- A Habitats Regulations Assessment (HRA) – It should include an appropriate assessment for nutrient impacts and recreational disturbance.
- A nutrient neutrality assessment and mitigation strategy.

Without this information, Natural England may need to object to the proposal.

104. This development falls within the 'Zone of Influence' (Zoi) for one or more of the European designated sites scoped into the Norfolk GIRAMS. All Norfolk LPAs are collecting a tariff of £210.84 per new dwelling towards the strategic mitigation package, at the time planning permission is approved. It is Natural England's advice that your authority should consider through an Appropriate Assessment whether this development qualifies for collection of the tariff if planning permission is granted.

105. Through the GIRAMS there is a requirement to deliver additional quality green infrastructure (GI) at a local level. In line with policy 3 of the Greater Norwich Local Plan all proposed residential development should provide GI equating to a minimum of 2 ha per 1000 population. The application does not satisfy this requirement in terms of the area proposed, its accessibility to all, nor is its design or placement within the site well designed to meet the recreational needs of the residents, including dog walking.

Sites of Special Scientific Interest (SSSI)

106. Natural England advise that the submitted ecological appraisal is revised to include Eaton Chalk Pit SSSI and assess the proposed development's impact on its interest features. Yare Broads and Marshes SSSI is a component SSSI of The Broads SAC, and an assessment of any potential impacts on this SSSI needs to be considered when an HRA is undertaken.

Network Rail and Tarmac Ltd

107. Object, the proposals have the potential to introduce sensitive uses, which have not yet been appropriately and robustly assessed and insufficient detail has been provided regarding mitigation, phasing, and design parameters, such

that the proposals could prejudice the future operation of Trowse Railhead and Depot.

108. Network Rail is concerned with ensuring that any new development coming forward in the vicinity of the Trowse Aggregates Railhead Depot does not prejudice its future operation or has the potential to place additional constraints or limitations on their activities and those of Tarmac. The approach is underpinned by the Agent of Change Principle in the NPPF.
109. Network Rail is concerned about potential impacts on Norwich Station passenger capacity that may arise from the development.
110. We could not find any mention of a travel demand forecast for Norwich Station within the Transport Assessment. The Transport Assessment should quantify the trip mode share assigned to rail travel for the residential and workspace populations of the development, along with increases arising from Active Travel improvements.
111. In addition, Network Rail is concerned about active travel connectivity between the site and Norwich Station. Connectivity relies upon the completion of new connections across the River Wensum and with routes on the north side of the river. Without these improvements, active travel options between the site and the station would be restricted by topographical constraints.

NHS Norfolk and Waveney Integrated Care System (ICS)

112. Seek contribution towards the costs of mitigating the impact of the development.
113. It is noted that this application is for one phase of a larger regeneration project including many more dwellings. This specific proposal comprises a development of 1859 residential dwellings in total, with a population growth of circa. 2650 additional residents in terms of net gain in population (allowing for movement in and out of the area), which will have an impact on the NHS funding programme for the delivery of healthcare provision within this area and specifically within the health catchment of the development. The ICS would expect these additional impacts to be fully assessed and appropriately mitigated.
114. The proposed development will have an impact on the services of local GP practices, Acute healthcare, Mental healthcare, Community healthcare and the Ambulance service operating within the vicinity of the application site.
115. The proposed development would have an impact on healthcare provision in the area and its implications, if unmitigated, may be unsustainable. In order to be considered under the presumption 'in favour of sustainable development' advocated in the National Planning Policy Framework, the proposed developments should provide appropriate levels of mitigation.
116. The practices closest to this development and therefore the primary healthcare services directly impacted by the proposed development, and which will be required to manage the extra primary care demand placed upon it from this development are: Lakenham Surgery and the Tuckswood branch of Castle Partnership. Data suggests that these GP practices are already or close to being oversubscribed for patient registrations. New registrations from this

development alone will add to capacity issues in this area. Further healthcare providers will also be impacted, with the community services being provided out of the Tuckswood surgery clinic and Norfolk and Norwich Hospital services running out of both Lakenham and Tuckswood surgeries.

117. Developer contributions via CIL or S106 will be required to mitigate the impact this development will have on the local healthcare services and ensure the equitable access to high standards of health and social care can be met. This development forms only a proportion of planned growth in the area which will result in a greater impact to healthcare than has been displayed in this response.
118. The ICS strategic estates acknowledges and welcomes the inclusion of Provision of land for a health facility sufficient to serve the East Norwich development as a whole in the planning obligation statement, and will welcome further discussions regarding this.
119. This development would give rise to a need for improvements to capacity, which, in line with the ICS strategic estates strategy, would primarily come from Improvements/reconfiguration, extension of existing infrastructure or the building of a new facility within the area. It will also give rise to increased investment requirements within our acute, community and mental healthcare settings, where the investment will be required to provide and develop functionally suitable facilities for patients, providing the required floorspace to manage the increased demand.
120. A developer contribution will be required to make this development sustainable and to mitigate the impacts of this proposal. The ICS strategic estates workstream has calculated total capital contributions required, split across all health sectors, in this instance to be £9,861,385.
121. Assuming the above concerns and requests are considered in conjunction with the current application process, the ICS strategic estates workstream would not wish to raise an objection to the proposed development, however without any mitigation the development would not be sustainable.

Norfolk Constabulary

122. This represents a very large-scale development that will significantly increase pressure on police resources. Therefore, to enable Norfolk Constabulary to enhance police infrastructure to support the NPPF aim to create safe communities and that crime and disorder, and the fear of crime, do not undermine the quality of life in the new development, it is considered necessary and justified that a contribution based on a development of up to 1859 dwellings of £168 used (in total £312,312 - index linked) is provided by the developers and should be delivered by s106 agreement.
123. This will ensure that the developer contributes to additional necessary infrastructure required to maintain and deliver a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime) for future residents and to meet planning policy requirements.

Norfolk Police – Designing out Crime

124. Detailed comments relating to numerous design, layout, public open spaces, parking elements of the residential and commercial parts of the full and outline parts of the submission. Full comments are available to view on the council's website.

Norfolk Fire Service

125. Our minimum requirement will be 1 fire hydrant per 50 single dwelling houses (or part thereof to provide adequate firefighting water supply, dependent on site layout) on a minimum 90mm potable water main and hydrant(s) shall conform to BS750. However, the final number of hydrants required will need to be assessed when the mix and type of housing proposed for the development area and layout is made clear.
126. Any buildings on the development, that do not comprise single dwelling houses, will be required to have fire appliance access and fire hydrant provision in accordance with Building Regulations

Norfolk Historic Environment Service (Norfolk County Council)

127. The proposed development site has a high potential to contain heritage assets with archaeological interest (buried archaeological remains) of at least of local and regional significance. These include (though not exclusively) Carrow Abbey, including below-ground remains of the Priory church and any associated burials, the possible gatehouse and hospital associated with Carrow Abbey. In addition upstanding and below-ground archaeological remains associated with Carrow Priory, both inside and outside the area protected as a Scheduled Monument, the geoarchaeological deposit model included in the archaeological desk-based assessment has identified deposits of high potential for archaeological remains of Palaeolithic and Mesolithic date and peat deposits with high paleoenvironmental potential.
128. If planning permission is granted, we ask that this be subject to a programme of archaeological mitigatory work.

Minerals and Waste (Norfolk County Council)

129. The Mineral Planning Authority (MPA) objects unless:
- the applicant carries out investigations/assessment regarding the noise impacts of the railhead operations if this has not been specifically investigated, and
 - the noise assessment and the Environmental Statement (ES) are amended to consider the Trowse railhead operations; including the fact that the railhead operations are not subject to any restrictions on operational hours or noise limits and therefore could be operation overnight, and
 - further mitigation is proposed in the ES for the residential amenity of the proposed development, if the noise assessment finds that impacts from the railhead operation could result in complaints from the future residents, that would prejudice the railhead's continued operation.

130. The Mineral Planning Authority is pleased to note in the illustrative masterplan intervening non-residential uses being proposed, along the eastern boundary, that will provide an acoustic barrier between the rail uses and the sensitive residential uses.
131. The current application has not appropriately considered the potential for noise from the existing Trowse mineral railhead to impact on the amenity of residents of the proposed development. Excessive noise impacts could result in complaints that prejudice the continued operation of the safeguarded rail head.

Planning Obligations (Norfolk County Council)

132. **Education** – Mitigation will be required for: 15 early education places, 254 primary school places, 14 sixth form places and a pro rata SEND contribution. The application does not currently provide this required mitigation in a location agreed with the County Council, therefore Children's Services object to this application.
133. Taking into account other large scale permitted developments (Anglia Square and Deal Ground extant outline) would generate a total additional demand for spaces for 101 Early Education age children, 354 primary age, 183 high school age and 19 sixth form age.
134. There is currently spare capacity within the Early Education, Primary and Secondary education sectors but no capacity within the Sixth Form sector. When considering other permitted developments and the number of children generated from these developments there will be insufficient capacity in the Early Years Sector (a deficit of 15 places), Primary Sector (a deficit of 567 places) and Sixth Form Sector (a deficit of 186 places).
135. Norfolk County Council's Children's Services object to this planning application due to the planning application not supporting the requirement for a new primary school, which is justified due to the numbers of children generated from this development.
136. In addition, if the remaining site allocations within East Norwich (the May Gurney Site and Utilities Site) were to also come forward during the plan period this puts further pressure on all education sectors and the need for the 2FE Primary School site on the Carrow Works site. The Greater Norwich Local Plan policy 7.1 states that 'a new primary school should need to be established'.
137. Based on the number of children generated from this development, 254 primary aged pupils, it creates the requirement for the minimum of a 420 place 2FE primary school. Therefore, a site in a location agreed by the County Council, is required on the Carrow Works site. The transfer of this site will need to be secured through a S106 agreement.
138. **Library:** A development of 1,859 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of the library.

Norfolk Wildlife Trust

139. No objection in principle. However, add comment that it would appear from the Preliminary Ecological Appraisal (PEA) and biodiversity chapter of the

Environmental Statement (ES) that there are outstanding recommended protected species surveys. It will be necessary for the applicant to demonstrate, for those elements of the wider hybrid application which are the equivalent of a full application, that all survey work and assessment has been completed in advance of any planning decision, in order to ensure that all impacts and potential mitigation are considered fully.

140. There is a clear requirement in the near adopted GNLP for 10% BNG, and so we strongly recommend that further evidence on the delivery of at least 10% BNG is provided with the application.

Norwich Airport

141. No aerodrome safeguarding objections to the application, provided it is in accordance with the plans attached to the application. Subject to an informative note about tall equipment/crane usage.

Norwich Cycling Campaign

142. An east-west route through the site is an opportunity to re-route the Red Pedalway away from its current dangerous and unpleasant route along King Street and Bracondale and instead provide a safe, direct and attractive route.

143. Norfolk County Council's Local Cycling and Walking Infrastructure Plan (LCWIP) identifies the re-routing of the Red Pedalway as a key objective. Re-routing the Red Pedalway will also re-route Sustrans National Cycle Route 1 (NCN1), providing a more welcoming entrance to the city for cycle tourists travelling from the south.

144. Our concerns can be summarised as follows:

- The east-west cycle route is not direct. What is being proposed takes a contorted route around three side of a rectangle. There may be some merit in providing a route along the riverside but an alternative direct route along the road (the desire line) should be provided as well.
- Cycle infrastructure should be built to comply with the current government design standards (LTN 1/20) which emphasise the need for cycle infrastructure to be accessible to everyone from 8 to 80, to be designed for significant numbers of cyclists (and for nonstandard cycles), that it must join together to make a connected network and that it must feel logical and direct.
- The bridge across the River Wensum which will allow for a safe, direct cycle route to the city centre should be included in the planning application.
- The improvements to the underpass to allow for a walking and cycling route under the railway should be included in the planning application.

Norwich Society

145. Objection.

- The application fails to include some features that are essential for the successful development of this new quarter and fails to offer the assurance that other essential requirements will be actually realised.
- The overall scale of the development proposed would have a seriously adverse impact on the Wensum River corridor at this point.
- The proposals would cause substantially harm to numerous outstanding heritage assets within the site.

146. It is very disappointing to see that the developer proposes to make no provision for a new two form entry primary school on this site. The Education Impact Assessment which has been submitted pays no heed to the particular circumstances of this site, nor to the wider ambitions for an educational centre here which could be part of a viable community hub for this new residential quarter. As it stands, the developer is restricting his ambitions to the standard payment of an infrastructure levy and is expecting primary-aged children in this new residential quarter to be walked off-site for up to two miles along heavily trafficked main roads twice a day. In reality, of course, we can expect a school-less development here to generate a substantial number of school-run vehicle movements on already heavily congested rush hour roads. The Society therefore believes that a school presence on the site is essential for the success of this new quarter and the refusal to provide a site for one would be a justifiable reason for refusal.

147. It is disappointing to see only limited assurance at this stage that the development will enable the active travel regime that is advocated in the master planning to date. At this largely indicative stage, the proposed east - west cycle route is rather more contorted than it needs to be and essential off-site connections (through the railway underpass to the Deal Ground and across the Wensum) are far from assured.

148. The Society is very concerned to see the developer's ambitions for the scale, and especially the maximum height, of all the new riverside buildings at Carrow Works.

149. The developer has been emboldened to go even further than the draft SPD and is proposing to front the river with blocks that are all "8-11 storeys", culminating in one that would be "11-14 storeys" and over 50 metres high. This last one is seen as a "gateway" building and the applicant's design code emphasises the desire to "maximise long views across the river and country park". The Society respectfully suggests that it is the long views of this building, not from it, that ought to be the most relevant design concern.

150. The Norwich Society shares the concern of the Broads Authority and others about the impact that such scale will have on the character of the Wensum valley at this point and is puzzled at the apparent change of stance that has occurred over the last decade. The north side of the river here has seen extensive development over the last decade or more and this has been typically capped at 8 storeys in height. Opinions differ as the architectural merits of these new blocks, but their scale and set back have avoided the levels of harm which might otherwise have arisen from taller buildings.

151. The Norwich Society is in full agreement with the concerns that have been expressed by both Historic England and the Ancient Monuments Society in this

respect. The current proposals would cause a high degree of harm to some of the truly exceptional heritage assets that lie within this site and are unjustified on the evidence before us. One effect of the proposals will be to separate the future of Carrow Abbey from the scheduled monastic priory ruins it sits within, to the detriment of both. The conversion of Carrow Abbey into three residential properties would inevitably come at a cost to some important parts of the surviving internal fabric and plan form of this important listed building, whilst the sub-division of Carrow Abbey's lawn for three private garden spaces will inevitably serve to obscure the public's understanding and appreciation of the former monastic cloisters.

152. The Society also is very concerned about the effects that the proposed development will have on the setting of the historic industrial buildings at Carrow Works, especially Building 7/8/8A. As View 12 of the applicant's visual assessment clearly demonstrates, the new building heights proposed along the entire river frontage will serve to dwarf this imposing structure and diminish its historic and visual significance. The Society is particularly critical of the developer's approach to Building 209 which is immediately adjacent to the listed warehouse. It is proposed for 'retention', but only in a grotesquely enlarged form where it now rises to 10 storeys and glowers over its listed neighbour.

153. It is far from clear how one can possibly grant detailed planning permission for the first phase of this project without any listed building application which fully specifies the listed building alterations involved in that phase. By the same token, the merely indicative plans in the outline element of this hybrid application leave one guessing at the eventual effect that such tall structures will have on the setting of the Abbey and the scheduled monument ruins.

Tree Protection Officer (Norwich City Council)

154. G61/G63 (G8 – TPO542) is a visually significant group of trees providing a valuable woodland habitat on site and I would be opposed to its removal. I would also suggest that T60 – misidentified as a beech in the Greengage survey (Red oak, T8 – TPO542) is also worthy of retention, and rather than categorising it as a 'C', a more appropriate 'B' category is applicable. Again, I would be opposed to its removal. Therefore, I would not be able to support this application in its current form.

Trowse Parish Council (TPC)

155. The conversion of Carrow Abbey and its associated outbuildings is a sympathetic one, however, there is feeling that this is possibly over development of the main house and the proposed size of the dwellings within it. It is also thought that only one car parking space for each dwelling is not sufficient.

156. The demolition of the dining area that abuts the Abbey is thought to be a good idea but there is concern that the area could become industrial/commercial buildings.

157. One of the main objections TPC has about this proposed development is the access and movement of traffic from the site. We already see significant amounts of traffic trying to access the Martineau Lane roundabout at peak times and adding more houses to this area will only increase this. There is the

added concern of when the Deal Ground development takes place that this will impact even more on a very busy area. TPC thinks the access and egress of this site (along with that of the Deal Ground) needs to be investigated further to seek an alternative/additional point of access.

158. Overall, the plans for this development are considered to be generally sympathetic with the industrial heritage of this area of Norwich and TPC are pleased to see the retention and enhancement of historic areas that are of importance to the City and Trowse's industrial links.

UK Power Networks

159. Advice and guidance provided in relation to development in close proximity to their substations.

Water Management Alliance

160. The site is outside the Board's IDD, and given that the discharge is proposed to the main river I can confirm that the Board has no comments.

Whitlingham Charitable Trust

161. In summary, the concerns of the WCT are:

- Whitlingham Country Park is a resource which operates at or close to capacity with regards its current Management Plan and budget; and
- The proposed development would substantially increase visitor numbers without increasing revenue into the park; and
- The adverse physical and financial impact of an increase in visitor numbers without a matching increase in funding to mitigate harm has been demonstrated with the recent experience of Covid 19

162. Without adequate mitigation the development will adversely impact an existing community resource and without appropriate mitigation will have an adverse impact on biodiversity within the Park, the Yare Valley and the wider area.

163. This application – and the wider ENSRA project - presents a substantial challenge to Whitlingham Country Park in that it would introduce a significant new population on the doorstep of the park. The application - and the wider ENSRA project - is explicit in seeking to direct new residents to the Country Park and it is inevitable that the development will result in a significant increase in the number of people visiting the park.

164. In terms of scale, the applicant estimates the population of the proposed development at 4,461 people. In addition, the application appears to be contingent on provision of a new bridge across the Wensum and seeks to link directly into the Deal Ground & May Gurney sites to the immediate East. These new routes would provide significantly improved access into Whitlingham for the existing and proposed residents of the Carrow Quay Development, and residents of the new homes on the Deal Ground & May Gurney sites.

165. The potential impacts arising from this increase in visitor numbers is exacerbated by the fact that the park's principal source of income from visitors is derived from car parking fees. Residents of the proposed development – a 'Low car' scheme situated some 360m from the park at its closest point – are highly unlikely to visit by car and, as such, will not contribute to the upkeep of the park by paying parking fees.

Yare Valley Society

166. The existing cycle routes in the vicinity of the Bracondale/King Street junction are inadequate and a disincentive to potential cyclists. Well thought out changes to the design of the roundabout at the Bracondale/Martineau Lane junction should make it safer for cycling and for walking. The changes should provide a much safer route for the users of a modified Outer Circuit Pedalway and should also better link the pedalway network with the proposed Deal Ground/May Gurney development and with the cycleway along Martineau Lane. (The Martineau Lane cycleway, with a few minor improvements, could provide a safe quicker route from the roundabout to Tuckswood and beyond.)

167. The east-west routes, particularly in the future, are likely to be popular routes for walkers, cyclists, and their families, for travelling to reach Whitlingham Country Park, and in the opposite direction travelling towards the City Centre. They should also provide for a re-routed and improved National Cycle Route 1, and Norwich Red Pedalway. A railway crossing in the form of a subway will need careful consideration if the segregation of walkers and cyclists is to be safeguarded, and the hazards of flooding are to be avoided. Has a bridge been considered?

168. The completion of the Bridge over the Wensum and the Underpass under (or bridge over) the railway should be a condition of approval of this application. Attention will also need to be given as to how the bridge over the Yare, to give access to Whitlingham Park, will be funded, and what arrangements may be needed should the Deal Ground development not proceed within a reasonable time frame.

Assessment of Planning Considerations

Relevant Development Plan Policies

169. Greater Norwich Local Plan (GNLP) March 2024

- GNLP1 The Sustainable Growth Strategy
- GNLP2 Sustainable Communities
- GNLP3 Environmental Protection and Enhancement
- GNLP4 Strategic Infrastructure
- GNLP5 Homes
- GNLP6 The Economy (including retail)
- GNLP7 Strategy for the areas of growth
- GNLP7.1 The Norwich Urban Area including fringe parishes, East Norwich
- GNLPSTR.01 (Formerly GNLP0360/3053/R10) East Norwich Strategic Regeneration Area

170. 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
- DM8 Planning effectively for open space and recreation
- DM9 Safeguarding Norwich's heritage
- DM11 Protecting against environmental hazards
- DM12 Ensuring well-planned housing development
- DM13 Communal development and multiple occupation
- DM16 Supporting the needs of business
- DM18 Promoting and supporting centres
- DM19 Encouraging and promoting major office growth
- DM20 Protecting and supporting city centre shopping
- DM21 Protecting and supporting district and local centres
- DM22 Planning for and safeguarding community facilities
- DM28 Encouraging sustainable travel
- DM29 Managing car parking demand in the city centre
- 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

171. Relevant sections of the National Planning Policy Framework December 2023 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF3 Plan-making
- NPPF4 Decision-making
- NPPF5 Delivering a sufficient supply of homes
- NPPF6 Building a strong, competitive economy
- NPPF7 Ensuring the vitality of town centres
- NPPF8 Promoting healthy and safe communities
- NPPF9 Promoting sustainable transport
- NPPF11 Making effective use of land
- NPPF12 Achieving well-designed and beautiful 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
- NPPF17 Facilitating the sustainable use of minerals

172. Supplementary Planning Documents (SPD)

- Affordable housing SPD adopted March 2015
- Main town centre uses and retail frontages SPD adopted Dec 2014
- Open space & play space SPD adopted Oct 2015
- Landscape and trees SPD adopted June 2016
- Heritage interpretation adopted Dec 2015

173. Advice Notes and Guidance

- Health impact advice note [for schemes of 100 dwellings or more] January 2012
- Water efficiency advice note October 2015
- Internal space standards information note March 2015
- Accessible and adaptable dwellings standards October 2015
- Bracondale Conservation Area Appraisal March 2011
- Greater Norwich Local Cycling and Walking Infrastructure Plan (LCWIP) March 2022
- Greater Norwich Infrastructure Plan 2022
- East Norwich Stage 1 Masterplan November 2021

174. Norfolk Mineral and Waste Core Strategy 2011

- Policy CS16 - Safeguarding mineral and waste sites and mineral resources

175. Emerging Policy

- East Norwich Supplementary Planning Document (SPD) – further consultation and adoption proposed later in 2024.

Case Assessment

176. 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 Policy 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.

177. At pre-application stage the local planning authority screened the project that is the subject of this application as Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) with the potential to cause significant environmental effects and therefore 'EIA Development' under the EIA Regulations. The Council confirmed to the applicants that the proposal would need to be subject to an Environmental Impact Assessment (EIA) and an Environmental Statement (ES) would need to be prepared. The planning application therefore includes an Environmental Statement (ES) which considers the likely significant effects of the development on the environment. The issues included within the ES relate to matters identified by the local planning authority through a scoping exercise and include impacts on: transport and access; air quality; noise and vibration; biodiversity and nature conservation; water quality; hydrology and flood risk; soils, geology, contaminated land; archaeology; heritage townscape and visual impacts, socio-economics and human health and climate change.
178. Schedule 4 of the EIA Regulations set out what should be included in an ES including the scope of the assessment to include the consideration of direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development during the construction and operational stages. The EIA process also requires the consideration of reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The findings set out in the ES are referred to throughout the report where relevant to the issue being assessed.
179. In addition, under Regulation 61 of the Conservation of Habitats and Species Regulations 2017 (often referred to as a "Habitats Regulation Assessment") the local planning authority is further required to carry out a Habitats Regulation Assessment. This is addressed in main issue 4 of the report with the council's assessment contained in Appendix 2.

Main Issue 1. Principle of development

180. Key policies and NPPF sections – GNLP2, GNLP5, GNLP7.1, GNLPSTR.01, DM1, DM12, DM13, DM16, DM33, NPPF sections 5 and 11.
181. Currently the Carrow Works site is a designated employment area and prioritised for employment and business development as set out in policy DM16 of the Development Management Policies Local Plan 2014.
182. Over recent years the manufacturing operations that once took place at the site have been scaled back and then relocated out of the area. Large parts of the site are now unoccupied, with the exception of a small number of

manufacturing, storage and distribution type uses located within some of the more modern warehouses on the site.

183. The release of the site for redevelopment can be considered at a strategic level to contribute to regeneration opportunities between the city centre and the Broads, alongside the Deal Ground and Utilities site allocations which form part of the former Local Plan Site Allocations policies (R9 and R10) and which have been carried forward into the new Greater Norwich Local Plan (GNLP) site allocation policy GNLPSTR.01.
184. The site represents previously developed 'brownfield' land. Government emphasis on prioritising development of brownfield sites is evident in the National Planning Policy Framework (NPPF) paragraph 123 which states that 'as much use as possible should be made of previously developed or 'brownfield' land'. Paragraph 124(c) suggests that 'substantial' weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs, and supports appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
185. To this end, this previously developed 'brownfield' site is now available for redevelopment and is located in a potentially sustainable location on the edge of the city. Applications for development on this site should be considered in this context and on their individual merits to determine whether they represent 'appropriate opportunities' to which the NPPF refers.
186. GNLP strategic policy GNLP7.1 now provides the high-level strategy for the Norwich urban area and its fringes, including East Norwich. It identifies East Norwich as a Strategic Regeneration Area (ENSRA), that will create a highly sustainable mixed-use quarter, provides the level of housing and employment growth to be achieved, and states that development must meet the requirements of the site allocations policy in accordance with guidance in a Supplementary Planning Document (SPD) (see Appendix 3 for GNLP policy 7.1 in full).
187. The proposed development represents a high density, residential-led mixed use urban regeneration scheme, which policy GNLP7.1 requires. Policy GNLP2 also requires development to make efficient use of land with development densities taking account of accessibility and local character, with an expected minimum net density of 40 dwellings per hectare in Norwich. The proposals represent 109 dwelling per hectare (total site area) and would clearly contribute in a significant way towards the Government's objective as set out in paragraph 60 of the NPPF of significantly boosting the supply of homes.
188. Officers consider that the extent to which the proposed scheme will contribute to boosting housing supply and meeting Norwich's housing needs is a material consideration of potentially significant weight. The context locally is that upon the adoption of the GNLP the council is able to demonstrate a 5.39 year supply of land for housing, which due to recent changes to the NPPF will be fixed for five years from the adoption of the plan. In any event the Carrow Works development was not anticipated to contribute to the housing land supply until further into the housing trajectory and therefore the determination of this planning application at this time does not have an immediate or direct impact upon the council's current 5 year housing land supply position.

189. Carrow Works along with the Deal Ground/May Gurney and Utilities Site form part of the East Norwich Strategic Regeneration Area (ENSRA). The ENSRA will create a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits. The principle of the redevelopment of this employment site is considered acceptable in the new GNLP which aligns with the council's ambitions for a transformative regeneration of this area as already expressed in an approved masterplan for the East Norwich area. Policy GNLP7.1 acknowledges that the sites may come forward on different timescales and therefore highlights the importance of development being guided by an area wide Supplementary Planning Document (SPD) and should meet the site wide and site-specific requirements set out in the site allocations policy GNLPSTR.01.
190. Carrow Works forms a significant part of the ENSRA. One of the main modifications to the GNLP saw a reduction in capacity of the overall housing number for East Norwich, reducing to 3,362 along with 4,100 jobs. It is anticipated that 3,000 of the homes will be delivered by the end of the plan period in 2038.
191. In advance of and intended to inform the GNLP, the East Norwich Partnership led by Norwich City Council was set up several years ago to bring forward comprehensive and coordinated regeneration of the East Norwich area. The applicant and site owners for the Carrow Works site were part of the partnership and were involved in the production of a Stage 1 Masterplan for East Norwich which was produced after a process of landowner, stakeholder and community engagement and was approved by Norwich City Council Cabinet on 17 November 2021.
192. The masterplan is currently going through a second stage where it has been refined, tested, updated and will be consulted upon to form an SPD to which policy GNLP7.1 refers. The current timeframe for final consultation and adoption of the SPD was subject to the adoption of the GNLP. However, it is currently anticipated that consultation on the SPD will take place in summer 2024, with adoption targeted for the end of 2024. While the SPD is still undergoing review and consultation, limited specific reference will be made to that document throughout this report, as at this stage of its production it would carry limited weight in the decision.
193. Strategic Allocation policy GNLPSTR.01 details the sites which form part of the ENSRA and sets out a number of site wide needs, followed by site-specific requirements relevant to each site, including Carrow Works. The sections of the policy relevant to Carrow Works are set out in full in Appendix 4.
194. Policy GNLPSTR.01 makes it clear from the start that 'development should be undertaken comprehensively and be guided and informed by the SPD for the ENSRA'. Any of the 'proposals should not prejudice future development of or restrict options for other sites in the ENSRA'.
195. In summary, site wide the East Norwich developments are also expected to;
- Be informed by the SPDs movement and connectivity framework, enabling connectivity and permeability within and between sites. Proposals should be designed for ease of access by public transport, with appropriate bridge provision to ensure full permeability by sustainable transport. Applications

should be supported by a comprehensive Transport Assessment which considers the whole of the strategic allocation.

- Create inclusive, resilient and safe communities, with good access to high quality homes that meet housing need and access to high quality jobs and services.
- Co-ordinate delivery of new social infrastructure (e.g new primary school, neighbourhood shopping centre, health facilities and recreational spaces, including public open spaces and child play spaces).
- Make the most of its riverside location. Provide a riverside walk along north and south banks of River Wensum and establish a recreational route to Whitlingham Country Park suitable for accommodating national Cycle Route 1.
- Achieve an exemplar high quality, high density of locally distinctive design, scale and form which respects its context and setting. Establish strong built frontages along the River Wensum and take account of significance of heritage assets and protected trees.
- Repair and re-use heritage assets with great weight given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designed heritage assets.
- Maintain the open character of the Yare Valley and preserve long views towards the Broads and open countryside.
- Protect and enhance existing biodiversity of the site including green infrastructure assets, corridors, trees and open spaces. Enhance linkages from the city centre to the Broads, Carrow Abbey Country Wildlife Site, the woodlands, the wider rural area and elsewhere in Norwich. Achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and River Yare and to the locally registered historic park and garden, along with appropriate improved public access.
- Be designed to mitigate the impact of vibration, noise generation, light and air pollution from adjacent industrial operations, roads and railways in order to protect the amenity of users and occupiers of the sites.
- Not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility.
- Address and remediate site contamination.
- Require an archaeological assessment prior to development.
- Undertake a site specific flood risk assessment prior to development and provide flood resilient design and incorporate appropriate mitigation measures in order to address flood risk from both river and surface water flooding.
- Allow scope for greater use of the Rivers Wensum and Yare for water based recreation, leisure and tourism.

196. Specifically Carrow Works is required to;

- Include conservation and long term management of the scheduled monument and listed buildings on the site and provide a suitable setting for designated heritage assets.
- Adopt and implement a strategy of heritage interpretation.
- Deliver the following key infrastructure, having regard to phasing and triggers set out in the SPD and subject to viability testing through individual planning applications.
 - a) High quality east-west pedestrian cycle route connecting King Street to the railway underpass and facilitate enhancement works to the underpass.
 - b) A pedestrian/cycle bridge over the River Wensum (linking to Carrow Road).
 - c) Key road infrastructure across the site (built to adoptable standards and able to accommodate public transport).
 - d) A second point of access to King Street.
 - e) High quality pedestrian/cycle routes to the city centre and Bracondale.
 - f) Off-site highway improvements, including junction enhancements and improved crossing facilities.
 - g) Safe and convenient cycle route through the site connecting the Martineau Lane roundabout to King Street.
 - h) Serviced site for a two form entry primary school.
 - i) Land for a health facility to serve the whole of the East Norwich development.
 - j) Neighbourhood shopping centre to meet day to day needs of residents in a location which is accessible to all future ENSRA residents by sustainable transport means.

197. The site-specific policy is reliant on a number of key pieces of infrastructure being in place in order to successfully deliver the highly sustainable mixed-use quarter that the policy promotes. The planning application that has been made and is under consideration here however fails to provide certainty as to the delivery of many of these key policy requirements. Many of these points will be assessed in more detail within the relevant topic sections that form the remainder of this report, however a summary overview of the proposals against the site-specific policy is found below.

198. Breaking the site-specific requirements of policy GNLPSTR.01 down into key topic areas, consideration will first be given to movement and connectivity, as without this and given the historic isolation of the site due to its past use, the development will remain in isolation and fail to achieve the highly sustainable

attributes required by the policy. This is discussed in more detail in main issue 7.

199. The application however only secures access and connections to the wider area by utilising existing or new access arrangements which remain entirely within the applicant's control. There remains insufficient detail with regards many of the site-specific policy requirements and as a result;

- a) there is no guaranteed provision of bridges or underpass enhancements to connect the site to surrounding land/developments or other parts of the ENSRA.
- b) The proposed second point of access to the site for vehicles is not considered by the highway authority to be in an acceptable location or of acceptable design.
- c) There is no firm commitment to deliver a package of off-site highway works to provide the necessary improvements to accessibility for pedestrians and cyclists and deliver the active travel measures required to deliver a truly sustainable development.
- d) There remain questions as to the suitability of some of the access arrangements internal to the site and whether they deliver the high quality east-west pedestrian/cycle route through the site, a riverside walk that is continuous and legible or an arrangement of roads that are suitable to accommodate a public transport route through the site.

200. With regards the sites heritage assets, discussed in more detail in main issue 5. When considered against the requirements of policy GNLPSTR.01, the application fails to;

- a) Conserve the sites designated heritage assets in a way which is not harmful to their significance or setting.
- b) Provide an acceptable strategy of heritage interpretation relating to both the site's use and assets within it.

201. With regards social and economic infrastructure provision. This is discussed in more detail in main issue 8. However, in summary when considered against the requirements of policy GNLPSTR.01 the application fails to deliver;

- a) A serviced site for a two form entry primary school.
- b) Land for a health facility sufficient to serve the whole of the East Norwich development.
- c) A neighbourhood shopping centre to meet day to day needs in a location that is accessible to all by sustainable transport means.

202. Therefore, in summary, through recently adopted strategic policy the principle of a mixed-use redevelopment of this previously developed 'brownfield' site can be considered an appropriate use for the site. However, the application as proposed fails to deliver many of the requirements of the site-specific policy that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. In addition, many of the deficiencies

in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result.

203. The application is therefore overall contrary to policy GNLP7.1 and GNLPSTR.01 of the recently adopted Greater Norwich Local Plan.

Main Issue 2. Housing

204. Key policies and NPPF sections – GNLP5, GNLPSTR.01, DM1, DM12, NPPF section 5 and 11.

205. Policy DM12 in the Development Management Policies Local Plan sets out the principles that apply to all residential developments. DM12 is permissive of residential development subject to a number of exceptions, none of which apply having regard to GNLP policy for this site. Policy DM12 includes a number of criteria (a-f) that should be met by new development. Criteria (a) relating to regeneration, (b) relating to impact on environmental and heritage assets and (c) in relation to achieving a diverse mix of uses are addressed in other sections of the report. The following paragraphs therefore focus on DM12 (d) 'Proposals should provide for a mix of dwellings, in terms of size, type and tenure including (where the size and configuration of the site makes this practicable and feasible) a proportion of family housing and flats to meet the needs of the community. The mix will be based on the findings of the Housing Needs Assessment or subsequent assessments'.

206. The application seeks consent for up to 1,859 dwellings, of which up to 143 are included within the detailed part of the application. The applicants Planning Statement indicates that all dwellings will be designed to meet nationally described space standards for internal space and at least 20% of homes will meet the Building Regulations M4(2) accessible and adaptable dwellings standard in line with policy GNLP5. A summary of proposed dwelling type and size is set out in the table below:

	Apartments – Private sale	Apartments – Build for Rent	Houses	TBC	Total dwellings
1 bedroom	355	217	1		
2 bedroom	540	227	78		
≥3 bedroom			316		
TBC			12	125	
	895	444	395	125	1859

**the submitted viability report suggests the TBC element has been assigned to flats*

207. Of the 1,859 dwelling total, 21% are specified as houses, 79% (1339+125) as 1 or 2 bedroom flats. The 2021 Local Housing Needs Assessment (LHNA) examines property size and tenure issues in Norwich for the period 2018-38. The LHNA indicates that, of the predicted need for market housing arising from the city council area (6,768 dwellings), approximately 25% (1,689 dwellings) is predicted to be for 1 and 2+ bedroom flats and 75% (5079) for 1-5+ bedroom houses. In relation to the need for houses, most need is for 3 bedroom properties (3,513). Therefore, over the plan period the proposed number of market flats within the Carrow Works development (1,464) has the scope to meet approximately 87% of the need for 1- and 2-bedroom flats and 8% of the need for family housing.

208. Policy DM1 states that development should help promote diverse, inclusive and equitable communities. In terms of the proposed dwelling types for the Carrow Works development, the proposed range is likely to limit to some degree the number and size of families who could be satisfactorily accommodated on the site. Policy DM12 acknowledges that the size and configuration of certain sites can influence the practicality and feasibility of including family houses. In addition on brownfield sites, where there is the objective to make effective use of land and convert existing buildings, flats provide greater flexibility and are important in generating development value to underpin viability. Furthermore, the East Norwich Stage 1 Masterplan anticipates substantial housing growth, high densities and a high proportion of flats, indicating for the ENSRA a development wide schedule of accommodation of 61% flats and 39% houses. However, the proportion of flats proposed as part of this application exceeds the Masterplan percentage by some degree and officers are mindful of the number of flats that have been built in the city in recent years and of other city centre sites which, over the plan period are expected to come forward, very likely with predominantly flatted schemes. On the basis of the LHNA, and without any other contrary market information, this may result in an oversupply of flats, suppressed market interest/values of these properties and in broader housing need for the city not being met.
209. In terms of tenure, the proposal makes no provision for affordable housing. For Norwich, the LHNA indicates over the period of 2018-38 a need for 5,086 dwellings to meet the needs of those who cannot afford market rents or are aspiring to home ownership. The proposal makes no contribution to meeting this identified need for affordable housing. Policy GNLP5 sets out a requirement for 33% of new housing to be affordable. A vacant building credit is likely to be applicable to development of this site, but there is insufficient information to establish the degree to which this would reduce the 613 affordable unit requirement (based on a total of up to 1,859 dwellings across the whole site). The 33% GNLP5 requirement applies unless the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage. The issue of viability and the impact this has on the viability of affordable housing provision is addressed in main issue 14 towards the end of this report.
210. Paragraph 66 of the NPPF requires that where major development involving the provision of housing is proposed, decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The NPPF sets out exceptions to this requirement, none of which apply to this application.
211. Carrow Works and the wider ENSRA represents one of the city's most significant regeneration areas. Strategic in scale it is envisaged as a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits. Policy GNLPSTR.01 states that development must create an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing need along with opportunities to access high quality jobs and services. A housing mix which fails to meet housing need, in particular for those in affordable housing need, is unsustainable and wholly unacceptable in terms of achieving regeneration benefits and planning for diverse, inclusive and equitable communities.

212. The Development strategy officer has stated that 'it is very disappointing to see that the applicant is not proposing to deliver any AH (*affordable housing*) on the grounds of viability, and we would therefore object to the application on this ground.' Having regard to the LHNA and the 3,323 dwellings needed between 2018-38 to meet the need for social and affordable rent, if meaningful levels of affordable housing are not delivered on large scale strategic sites there is significant risk that this need will not be met.
213. The application proposes a quantum of new homes, which positively supports the delivery of significant housing growth in this location. Housing delivery of this scale is capable of being afforded substantial weight in the planning balance. However, in the absence of any contrary evidence, the housing types proposed and particularly the predominance of flats is not consistent with the Greater Norwich Local Housing Needs Assessment. This along with the total lack of affordable housing results in an unsustainable housing development proposal, whereby the mix of dwellings by type and tenure fail to promote the creation of a mixed, diverse, inclusive and equitable community, contrary to policy DM1 and DM12 of the Development Management Policies Local Plan 2014, policy GNLP5 and GNLPSTR.01 of the Greater Norwich Local Plan 2023 and the NPPF.

Main Issue 3. Employment, retail and other town centre uses

214. Key policies and NPPF sections – GNLP2, GNLP4, GNLP6, DM18, DM19, DM20, DM21 and NPPF section 7 and 9.
215. As a mixed-use development, the hybrid planning application proposes up to 26,630sqm of flexible mix of business and commercial (including retail uses), hotel, residential institution, learning and non-residential institutions, local community uses, general industrial, storage and distribution uses within new and converted existing buildings. A significant proportion of this floorspace (66% or 17,625sqm) is included within the full submission.
216. Offices, light and general industrial, research, storage and distribution are defined in Policy DM16 as employment development. Such uses are promoted on sites designated as employment areas where this would not conflict with other policies in the plan in relation to town centres and office development. The site is currently designated as an employment area and in the past the site has played an important role in providing significant number of jobs within the city.
217. Retail, leisure and office uses are defined by the NPPF as main town centre uses. Developments involving these uses (with the exception of offices) are subject to existing Local Plan policy DM18 and policy DM20. Policy DM18 is supportive of main town centre uses within the city centre primary and secondary retail areas, large district centres and existing and proposed district and local centres where their scale is appropriate to the centre's position in the hierarchy set out in policy JCS19 and does not exceed the indicative floor spaces set out in appendix 4 of the Local Plan. Although the JCS has been superseded by the GNLP, policy GNLP6 sets out a similar hierarchy.
218. Policy DM19 allows new office accommodation within identified priority areas (this is not a priority area) or where the proposals would not conflict with sustainable development criteria, is appropriate to the character and function of the area and where justified by a sequential site and impact assessment.

219. The site is not currently or proposed to be specifically designated as a district or local centre suitable for main town centre uses. However, it is recognised in policy that the sites forming part of the ENSRA will create a highly sustainable mixed-use quarter accommodating substantial housing growth and significant new employment opportunities. To this end policy GNLP7.1 highlights provision of 3,362 homes and 4,100 jobs across the whole of East Norwich.
220. Works that have taken place to support the site specific policy and the formation of the SPD have sought to include non-residential uses to complement the existing offer in Norwich, but also create new opportunities to meet the needs of residents and businesses. It is envisaged that appropriate levels of retail could be included as part of the range of commercial uses (including business, leisure and community uses) in the main street area of the site. Some limited neighbourhood scale convenience retail could be acceptable as part of a mix of uses, however the format would be expected to be for a local 'walk-to' facility rather than a larger out of centre retail format with generous parking aimed at drive by trips, which would not be acceptable in this location.
221. The stage 1 Masterplan which informed the GNLP policy worked up a vision for the Carrow Works site as providing an opportunity for a dynamic mix of non-residential uses. It suggests a mix of office, co-working, small and medium enterprises, food hall and ancillary retail space along the riverside area and in the northwest of the site. Along the main east-west street a new high street of uses to support residential and workspaces would be created with small format food retail and hospitality, professional services and leisure, health and fitness uses. In areas adjacent to the railway line and to the northeast, light industrial and workspace uses will provide a buffer between the railway line and the new high street and residential uses. Finally, alongside the main entrance to the site from the Martineau Lane/Bracondale roundabout a community cluster of social facilities including a primary school and health facilities is envisaged.
222. Care should be exercised however as an existing large district centre at Riverside Retail Park is located approximately 850 metres from the existing site access (or just 300 metres from the site via a new bridge when provided over the River Wensum). Also the edge of the city centre primary retail area at Ber Street is located just 1.4 km to the north west. Therefore, it should be ensured that the amount and mix of employment uses proposed at the site would not compete with this existing large district centre or city centre retail and service offering such that it impacts on the vitality and viability of these centres.
223. Policy GNLPSTR.01 states that Carrow Works will provide 'a neighbourhood shopping centre to meet the day to day needs of future residents ... in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means'.
224. The applicant's outline parameter plans include a land use plan which shows a small amount of Class B (employment) provision alongside the railway. It also shows Class E (commercial, business and service) uses within existing buildings to the northwest of the site and as part of a flexible provision alongside residential uses at ground floor level along the east west route and the riverside and also in a location to the east of the site entrance from the Martineau Lane/Bracondale roundabout. In addition, supporting documents,

including the Design Code, make it quite clear that 'local retail, including a large food store at the main entrance' forms part of the mixed-use land use proposals which form part of the outline part of the application.

225. A Retail Statement has been submitted with the planning application which includes both a Main Town Centres Use Retail Sequential Test Assessment and a Retail and Leisure Impact Assessment. Non-residential uses are set out within the report as follows;

Total non-residential uses	26,630 sqm
Comparison and convenience retail and leisure uses	12,356 sqm
Office floor space	11,271 sqm
Industrial Floor Space (Class B)	3,003 sqm

226. The report suggests that of the 23,627 sqm of commercial floor space 12,356sqm of comparison and convenience retail and leisure floor space will be mainly located at ground floor level within existing and proposed buildings along the main street and riverside areas of the site. However, 2,203 sqm of convenience/food retail is suggested in the area alongside the main entrance to the site from the Martineau Lane/Bracondale roundabout. This represents a significant amount of total retail and leisure floor space, similar in scale to existing large district centre provision at Riverside and Anglia Square. Careful consideration will be required to ensure that the amount of floor space and type of provision proposed does not give rise to significant detrimental impacts on existing provision within designated centres.

227. The report provides an assessment of potential sequentially preferable sites and an analysis of the proposal's retail impact on the relevant defined centres within the 'assessment area'. While citing case law relating to disaggregation (the breaking down of the development into smaller parts to accommodate it across more than one site) the report considers it appropriate to only consider sites of between 13.51 hectares and 20.29 hectares (total area of the whole mixed use development site including a 20% allowance either way) as part of the sequential test. They consider this appropriate due to the non-residential uses on this mixed-use development site being inter-dependent on the other elements of the proposals (i.e. the residential uses). However, the development proposed forms a substantial part of a wider residential-led-mixed use community. Residential is the primary element of the allocation and therefore it does not seem appropriate to consider that such a large site area should form part of the requirement of the sequential test without being broken down into its constituent land use parts or even broken down further into the two separate areas for potential non-residential focus on the site of the riverside/main street area and the area adjacent to the existing site access to the Martineau Lane/Bracondale roundabout. Given that the application site forms a large part of one of the city's two strategic regeneration areas (Anglia Square being the other) it comes as no surprise that a sequentially preferable site of a size that can accommodate the whole mixed-use development cannot be found.

228. The applicants impact assessment maintains that the retail and leisure elements of the proposed development would mainly cater for the day-to-day needs of the future residents of the proposed development and the wider East Norwich allocation. They suggest that only a small amount of trade diversion from existing centres at Riverside and the city centre is likely to occur due to the relative scale of the retail provision on offer at existing centres and the different type of offering proposed at the site. They actually suggest that the proposals would contribute overall to the vitality and viability of these centres due to the additional footfall and turnover that will be available within the catchment area of these locations.
229. The impact assessment concludes that there will be up to modest diversion from surrounding retail and leisure units within the proposal's catchment area. It goes on to suggest trade diversion through direct competition with Aldi at Hall Road Retail Park/Sandy Lane (a district centre) is possible and minimal diversion from Morrisons superstore at Riverside Retail Park (a large district centre), including likely draw of customers from the immediate rural areas outside Norwich using the A146. This demonstrates a clear intention of the Class E convenience retail use to take advantage of its location at the entrance to the development and close to the existing road network, and the inner and outer ring road, as an opportunity to benefit from linked trips, diverting car based trips into the site.
230. The suggested food store use in a location alongside the main site entrance is some distance from parts of the Deal Ground and Utilities sites and therefore would not be a location which is particularly accessible to meet the day to day needs of all future residents of the ENSRA as required by policy GNLPSTR.01. It would appear to be more the case that the scale, proximity and visibility of the food store site from the main site access would attract visits from car based users of the adjacent inner and outer ring road which forms an important part of the city's highway network. The existing physical road infrastructure and layout presents a busy and unattractive walking and cycling environment and therefore acts as a barrier to accessing the site by means other than the private car. In addition to the lack of clear and committed improvements to infrastructure to improve active travel to the site or between constituent parts of the ENSRA, the introduction of larger format convenience retail in this location will likely encourage use of the private car to access such a use, therefore failing to reduce dependency on the private car or the shift towards non-car modes that policy DM1 or policy GNLP4 requires.
231. The submission also proposes a significant amount of office floor space (11,271sqm). It is well documented that since covid demands for office space have changed with demands for many traditional forms of office accommodation falling within the city. Therefore, although office use is considered to form an acceptable component of the mix of uses that would generate jobs at the site, there is nothing within the submission that suggests the type of office space or the amount of office floor space is appropriate or indeed sustainable in this location and will not impact on existing office accommodation provision in the city.
232. It is recognised that a significant amount of non-residential floor space provision will be required to generate the jobs that this strategic allocation commits to deliver together with meeting the day to day needs of residents and workplaces. However, no detailed economic strategy has been provided by the

applicant which breaks down in more detail the uses proposed and their location and the contributions that this will make to job creation or to demonstrate how the retail and leisure and office uses can be achieved without impacting on existing town centre use provision or office accommodation on sites designated for such uses nearby. A wide range of flexible uses across more than 12,000sqm metres of floor space in particular could have quite significant impacts on Riverside Large District Centre (total units approx. 16,000sqm). If no controls are placed on amounts of floor space for specific parts of this extremely broad planning use class, significant amounts of, or large format retail for example could impact greatly on the viability of existing retail centres in such close proximity. The submission currently does not provide sufficient detailed information to conclude whether the non-residential uses proposed would comply with the detail set out within GNLP policies.

Main Issue 4. Impact of the development on European designated sites of nature conservation interest

233. Key policies and NPPF sections, GNLP1, GNLP2, GNLP3, GNLP7.1, DM1, DM3, DM6, DM8 and NPPF section 15.
234. The proposed scale of residential development at Carrow Works has the potential to impact on European and Ramsar designated sites.
235. Local Authorities, as competent authorities have a legal duty to help protect, conserve and restore European sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)). Protection includes prevention of significant deterioration and significant disturbance.

Nutrient impacts

236. The Dutch Nitrogen Case¹ ('Dutch-N'), heard in the court of Justice of the European Union (CJEU), ruled that where an internationally important site (i.e., Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites) is failing to achieve a favourable condition due to pollution, the potential for a new development to add to the nutrient load is "necessarily limited". The Dutch-N case has informed the way in which regulation 63 of the Habitats Regulation 2017 should apply to pollution related incidents. This has resulted in greater scrutiny of proposed developments that are likely to increase nutrient loads to internationally important sites where a reason for unfavourable condition is an excess of a specific pollutant.
237. Following the Dutch Nitrogen Case, on the 16 March 2022 Natural England issued new guidance to a second tranche of local planning authorities (including Norwich and other Norfolk authorities) concerning nutrient enrichment and the role local authorities must play in preventing further adverse impacts to protected wetland habitats. The importance of achieving nutrient neutrality stems from evidence that large quantities of nitrogen and phosphate nutrients entering water systems cause excessive growth of algae, a process called 'eutrophication.' This reduces the oxygen content of water which increases the difficulty of survival for aquatic species; subsequently removing a food source for protected species. Local Planning Authorities are now required to consider the impact of nutrient enrichment before planning permission can be granted and therefore all planning applications for certain types of developments in the affected catchments have been put on hold until it

can be demonstrated how they will mitigate any additional nutrients arising from them.

238. Policy GNL3 states that all residential development that results in an increase in the level of overnight stays and non-residential development that by virtue of its scale and type may draw people from outside of the catchment of the River Wensum and Broads SAC must provide evidence to enable the local planning authority to conclude that the proposal will not adversely affect the integrity of sites in an unfavourable condition. This part of the policy reflects the current advice provided by Natural England in relation to development proposals that have the potential to affect water quality due to adverse nutrient impacts on designated habitats sites and Habitat Regulations requirements.

Recreational disturbance impacts

239. The potential for recreational activities to disrupt the protection objectives of habitats sites in and around Norfolk is related to the level of growth in each Local Plan 'in combination'; specifically, an increase in population resulting from identified new housing requirements across the County that will in turn ensure more people visit habitats sites for recreation. This residential growth, combined with an increase in tourism accommodation, will result in more people visiting and possibly harming habitats sites as a result of residents visiting sensitive protected sites for recreational purposes.
240. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS) has been produced to support Local Planning Authorities (LPAs) in Norfolk in their statutory requirement to produce 'sound' i.e., legally compliant Local Plans for their administrative or Plan making areas. Norfolk authorities adopted GIRAMS in March 2022. The strategy addresses individual, and the in-combination impacts of recreational impacts at habitats sites from residential development predicted across Norfolk. On 9th March 2022 the Council adopted the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) to deal with the issue of visitor impacts of new development.
241. In relation to the in-combination impacts, since 31 March 2022 all local authorities in Norfolk have applied, to relevant permissions, a RAMS tariff of £210.84 (RPI indexed link) per property. These pooled RAMS payments will fund a package of measures to manage and reduce the impact of people making extra visits to Special Areas of Conservations (SACs) in the county, including the Broads and the Norfolk Coast. The second element of the strategy relates to 'GI' and securing the provision on/near development sites Green Infrastructure provision, for the purposes of avoidance in the first instance and to mitigate the impacts of the individual development itself. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation rather than visiting habitats sites.
242. Policies DM3 and DM8 relate to green infrastructure and open space requirements. DM3 requires all new development to make appropriate provision for both the protection of existing and the provision of new green infrastructure as an integral part of the overall design which complements and enhances a development. DM8 relates to open space and recreation and requires all new development to contribute to the provision, enhancement and maintenance of local open space either by means of on-site provision or direct

contribution through the community infrastructure levy. Neither of these policies, or accompanying SPD, set out detailed/specific requirements for the amount of GI/open space provision.

243. Policy GNLP3 refers explicitly to the issue of visitor pressure and includes a requirement for the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of the residents as an alternative to visiting the protected sites. The policy reflects the findings of the Norfolk GIRAMS strategy and states that all residential development will address the potential visitor pressure, caused by residents of the development, that would detrimentally impact on sites protected under the Habitat Regulations Directive through;

- Payment of a contribution towards the cost of mitigation measures at the protected sites (as determined under the GIRAMS plus an allowance for inflation), and
- The provision or enhancement of adequate green infrastructure, either on the site or nearby to provide for the informal recreational need of the residents as an alternative to visiting the protected sites. Provision should equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace (ANG) Standard.

244. Policy GNLP3 reflects the findings of the Norfolk GIRAMS strategy and Habitat Regulations requirements. Policy GNLP1, GNLP7.1 and GNLPSTR.01 for East Norwich also make reference to development being required to protect and enhance biodiversity and green infrastructure assets, networks, corridors, trees and open spaces, however it is the strategic level policy GNLP3 which applies to development across the whole Plan area which carries most weight for the purposes on this decision.

Mitigation measures

245. Without appropriate mitigation the proposed development would therefore have an adverse effect on the integrity of:

- The Broads Special Area of Conservation (SAC)
- Broadland Special Protection Area (SPA)
- Broadland Ramsar
- Breydon Water SPA
- Winterton-Horsey Dunes SAC
- Great Yarmouth and North Denes SPA
- North Norfolk Coast SAC
- North Norfolk Coast SPA
- North Norfolk Coast Ramsar
- The Wash and North Norfolk Coast SAC

- The Wash SPA
- The Wash Ramsar
- Norfolk Valley Fens SAC

246. In terms of assessing the impact of the proposed development and demonstrating sufficient mitigation is secured to ensure the development will not adversely the integrity of the identified European sites, the applicant's should set out how the development will meet the requirements of both GIRAMS and nutrient neutrality.
247. Within chapter 10 of the applicant's Environmental Statement (ES) it is acknowledged that the operational phase of the development, with an increased number of dwellings, will result in potential increased nutrient pressure by additional wastewater and additional recreational impacts, on internationally designated sites. In both cases, it is recognised that in the absence of mitigation this could cause significant, permanent, negative impacts on an international scale.
248. On the matter of increased nutrient impacts the report suggests that there are various options available for nutrient load impacts, but no specific measures have been opted for. It goes on to suggest that the detailed/full part of the application does not include any new buildings and therefore proposes that nutrient neutrality is considered and conditioned at the reserved matters stage. This demonstrates a significant misunderstanding by the applicant of the implications of nutrient neutrality on their development. The detailed/full part of the application includes the creation of new dwellings, some through conversion of existing buildings and some through new build dwellings and therefore the nutrient impacts of the development does need to be considered at this stage and cannot be subject to planning condition.
249. A more realistic summary of the situation with regards nutrient neutrality mitigation solutions as currently observed by officers is that, although progress is being made on identifying mitigation solutions and bringing such solutions forward to the market to allow developers to purchase mitigation credits, there is still work to do. For a development of this scale mitigation requirements will be significant and it does not appear that the applicant has made any attempt to identify and source mitigation measures/credits.
250. No Nutrient Budget Calculator has been completed or provided to calculate the level of nutrients arising from the development to then determine the amount of mitigation required. An allowance is made for nutrient neutrality within the applicant's financial viability report (as an unconfirmed amount for mitigation within developer contingency) and is proposed for inclusion within any legal agreement, but goes on to highlight that further discussion with the local planning authority on this matter will be required. However, no such discussion has taken place.
251. On the matter of recreational disturbance impacts, although the financial viability report does include a payment of the RAMS tariff, no mechanism has been provided through a legal agreement to secure payment of the tariff to mitigate the 'in combination' recreational impacts of the development.

252. No assessment has been provided of the green infrastructure provision which forms part of the application or the green infrastructure requirements of the development to meet the individual recreational requirements of the development in accordance with policy GNLP3. The ES highlights that a total of 4.7 hectares of open space will be provided, broken down into;

- 0.8 hectares of parks and gardens,
- 2.62 hectares of natural and semi-natural green space,
- 0.05 hectares of provision for children and young people,
- 0.13 hectares of green corridor.

It is not clear whether this is the amount of provision that is shown on the high level 'Public Open Space' Parameters plan which forms part of the outline application.

253. Using average household size of 2.4 people this amounts to a resident population of 4,461 (based on 1,859 dwellings). Using Natural England's Accessible Natural Greenspace (ANG) Standard the development would be expected to deliver approximately 9 hectares of green infrastructure just to meet the informal needs of residents from the development. No clear green infrastructure assessment has been provided which sets out in more detail the GI provision on site and its function or assessment of existing accessible off-site green space provision capable of offering recreational opportunities with GI enhancement. It would appear that the development is deficient in the amount of green infrastructure provision on site, its placement and potentially its design and functions being able to meet the recreational needs of the residents (including dog walking). GI enhancement off-site will therefore likely be required. This does not appear to have been recognised within the applicant's submission and this deficiency in GI is something that Natural England have commented upon.

254. Of note is the proximity of the site and the whole of the ENSRA to Whittingham Country Park, a 113 hectare park which incorporates areas of woodland, grazing meadow and water space provided by two broads, which serves as a valued recreation space for residents and visitors to Norwich. Given its proximity to the site (just over a mile by road from the existing site entrance) and subject to securing appropriate active travel improvements between the sites as the policy requires, this could be a logical area of existing green space that new residents could benefit from and enjoy for their recreational needs. However, it would need to be ensured that any necessary enhancement of this existing green infrastructure is secured to satisfactorily accommodate and mitigate the corresponding increase in the number of visitors to the county park without detriment to the park itself. This has been raised as a valid concern on behalf of Whittingham Charitable Trust who manage the country park by lease from the landowner, Crown Point Estate.

255. Therefore, neither a GIRAMs contribution nor mitigation to ensure that the development is nutrient neutral have been provided by the applicant. In addition, it has not been demonstrated that there is adequate green infrastructure provision on site or enhancement of any nearby provision to meet the informal recreational needs of the residents of the proposed development.

256. Under section 63 of the Habitat Regulations the council, as competent authority, before deciding to give consent to a project that is likely to have a significant effect on a European Site must make an appropriate assessment of the implications of the project for that site in view of that site/s conservation objectives. The competent authority may only agree to the project after ascertaining that it will not adversely affect the integrity of the European site.
257. No shadow Habitat Regulations Assessment, Appropriate Assessment or 'such information as the competent authority may reasonably require for the purposes of such an assessment' has been made available to enable the local planning authority to fully assess the impacts of the development and determine no adverse effects on the integrity of protected sites. The information that has been provided can only lead to a precautionary conclusion that the proposed development would give rise to adverse affects on the integrity of habitats sites in an unfavourable condition due to significant deficiencies in mitigation.
258. An Appropriate Assessment concerning both recreational impact and nutrient neutrality has been carried out by officers and can be found in Appendix 2.
259. The Appropriate Assessment concludes that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in nitrate and/or phosphate levels which would further adversely affect the current unfavourable status of the Broads Special Area of Conservation or demonstrate that this proposal would not result in an increase in recreational disturbance due to the impact of additional visits to Special Areas of Conservation (SACs and SPAs) in the Wash, Norfolk Coast and the Broads. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of these habitats sites and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).

Main Issue 5. Heritage

260. Key policies and NPPF sections – GNLP3, GNLP7.1, GNLPSTR.01, DM3, DM9, DM12, NPPF section 12 & 16. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
261. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on the local authority to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law (specifically *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014]) has held that this means that considerable importance and weight must be given to the desirability of preserving the setting of listed buildings and conservation areas when carrying out the balancing exercise.
262. NPPF paragraph 201 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by

a proposal (including by development affecting the setting of a heritage asset) and take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. "Great weight" should be given to the conservation of heritage assets (NPPF paragraph 205) and the implications of identifying levels of harm in relation to different grades of heritage asset are explained in paragraphs 206-208 of the NPPF. Importantly, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Furthermore, adopted policy DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets.

263. Policy GNLP3 requires development to avoid harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and other relevant policies of the Development Plan. Whereas policy GNLP7.1 looks for conservation and enhancement (where possible) of the significance of heritage assets. The site-specific policy GNLPSTR.01 confirms a general presumption in favour of the repair and re-use of heritage assets on site as part of any redevelopment proposals. It requires great weight to be given to the conservation of all designated heritage assets across the ENSRA and proposals should provide a suitable setting for designated heritage assets affected by the proposal on and off site including key views from and into the site. Development proposals should draw upon local character and distinctiveness and conserve, or where opportunities arise, enhance the character and appearance of the conservation areas affected, the scheduled monument, listed buildings, locally listed buildings and other non-designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting).

264. A large part of the Carrow Works site lies within the Bracondale conservation area and forms a significant part of that conservation area. The scale of the development proposed will undoubtedly have an impact on the conservation area, a significant number of designated and non-designated heritage assets within it and some around it (including Carrow House), and on the wider city/townscape and approach to the countryside on the edge of the city. It will change the setting of those assets and the contribution the setting makes to the appreciation and significance of those assets. A list of heritage assets can be found in paragraph 11 above and will be discussed in more detail as necessary in the remainder of this section.

265. The application has been accompanied by a Heritage and Townscape Visual Impact Assessment (HTVIA) as part of a technical appendix to the Environmental Statement. The HTVIA assesses the significance and contribution of setting to significance of heritage assets and provides an assessment of the likely heritage, townscape and visual effects of the development during construction and operation of the development by carrying out a visual impact assessment. An assessment of significance is provided for each individual heritage asset, together with relative significance of buildings and spaces. There is however no wider assessment of the site as a collection of heritage assets as a whole. Accurate Visual Representations (AVRs) are used to assess effects on setting of heritage assets as part of a viewpoint analysis, using either verified wireline views or verified renders. There are

questions and conversations that remain to be had around some of these representations, especially given the 3D views provided within the applicants Daylight and Sunlight Report for the same development parameters. Again, it has not been possible for these discussions to take place due to the lack of engagement by the applicants.

266. Alongside specialist conservation advice from the council's own conservation and design officer, three organisations with a special remit for and interest in the conservation of the historic environment have commented on the application. They are Historic England, Ancient Monuments Society and the Norwich Society. All conclude that the scheme would harm the historic environment and their positions are summarised within the assessment, broken down across the site and its groups of assets below.

Carrow Abbey and grounds

267. This is a very interesting site in heritage terms with the remains of a Benedictine convent, remodelled and expanded in the late Victorian and Edwardian period as a private home for the wealthy Colman family, who simultaneously developed their industrial works adjacent to this along the river. There is a high level of archaeological, architectural and historical significance in these layers as well as communal value.
268. The ruined portions of the Priory (a scheduled monument) are a rare survival of one of a small known number of female religious houses. Founded in 1146 it has exceptional standing, buried and earthwork remains.
269. The remains include the prioress's house built in the 15th century then adapted and expanded to form the Colman's home, referred to as 'Carrow Abbey' which is grade I listed. The craftsmanship and detailing of this late Victorian and Edwardian home are of a very high quality and much survives of the fabric and plan form. It illustrates the work of Edward Boardman, an important architect with strong associations with Norwich.
270. One of the important characteristics of the site is the two distinctive characters of the Abbey site and the industrial works. The dramatic change in gradient between the Abbey that sits on an elevated plateau above the river and the works site located at a lower level along the riverside and railway provided a separation between the factory and domestic parts, which was strengthened by planting.
271. It is the view of Historic England that the historic core of the site around the Abbey (character areas 1, 2, 5 and elements of 4 as identified within the HTVIA) is the most sensitive part of the site. While there is potential for considerable new development across the site as a whole, maintaining and enhancing these historic assets and the open garden setting around them is important.

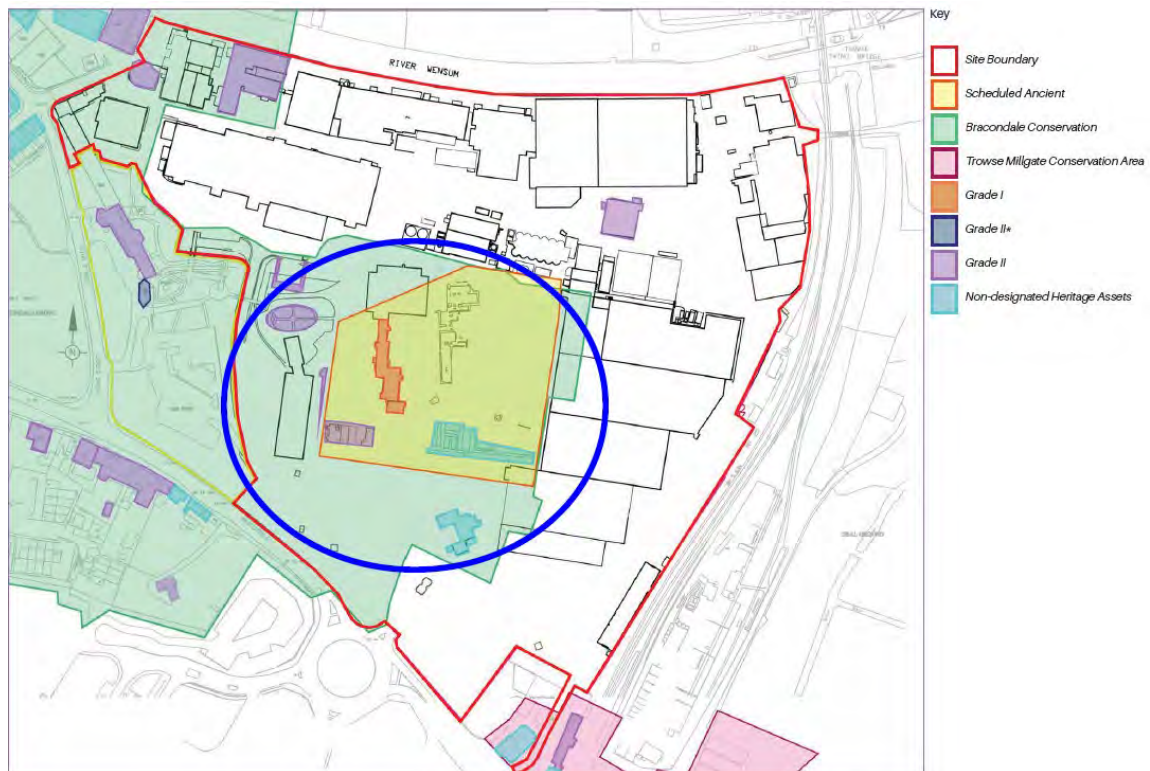


Figure 6.11 Site plan showing heritage assets

272. The site plan above highlights in colour the various heritage assets, the conservation area and the extent of the scheduled monument (incorrectly depicted as it should follow lines that include the large square block of the dining hall). Throughout the remainder of this section reference is made to the historic core of the site which is an area roughly encircled on the above plan. Proposals in this area of the Abbey site and its grounds involve the conversion and subdivision of the Abbey into three separate dwellings together with its curtilage land immediately to the east (the site of monastic cloisters) in order to accommodate individual private gardens. Along with internal works to the Abbey, there is proposed demolition of the modern single storey/bungalow addition to the south of the Abbey and the extensive single storey dining hall/canteen attached to the north. These works of demolition of low significance additions, would better reveal the Abbey, physically separating it (through demolition) from more modern additions and improving its setting, which represents a clear conservation benefit and is supported in principle by the conservation consultees.

273. However, in their place is proposed a two storey extension to the north of the Abbey to create additional living space for the northern most dwelling, together with a cluster of nine new build residential dwellings. Both are discussed in more detail later.

274. The subdivision of Carrow Abbey would mean the building could no longer be appreciated as a single property. Much of the Abbey's architectural and historic interest lies in the high survival of late Victorian and Edwardian fabric and the plan form. The division of the house would limit the ability to appreciate its plan form and the quality of the rooms and fabric which collectively illustrate a high-status domestic property of this period.

275. Historic England have observed directly that the insertion of partitions and services to create the separate dwellings would compromise these rooms and the historic fabric. They comment that 'the division between houses 1 and 2

affects the two grandest parts of the house, including rooms with exceptional panelling and other fixtures. The addition of new panelling could compromise the rooms. The insertion of a bathroom on the first floor of house 1 would detract from the space and appreciation of the moulded timber ceiling. The bathroom proposed between the existing staircase and window also looks very tight against the window. The division between houses 2 and 3 would cut across the tiled service corridor on the ground floor and panelled cupboards in the first-floor corridor’.

276. The proposed new extension at the northern end of the Abbey at two storeys is higher than the existing link in this location and would obscure more of the exceptional flint work to the gable elevation and would therefore harm the significance of the building.

277. Historic England raise concerns that the creation of private spaces across the historic core of the site would change the character of the site from a unified landscape. It would harm the significance of the heritage assets which were designed to be appreciated within an open landscape. Externally, the former monastic cloister can currently still be clearly read as such and provides a tangible link between Abbey House and the upstanding priory ruins. Any subdivision of the cloister into private gardens, or separation of it from the priory ruins or house, would substantially compromise the way the monastic complex can be understood and appreciated and would harm the significance of both the scheduled monument and grade I listed house, a view shared by the Norwich Society. Also, the resulting separate ownerships would create challenges for the future management of the monument in a holistic way and could compromise how it is appreciated.

278. The council’s conservation and design officer raises similar concerns regarding the potential level of harm to the significance of the grade I listed Abbey and its association with Carrow Priory (scheduled monument). The Abbey, being a significant element of this historic setting, has a strong connection with the surrounding soft landscape and the scheduled Priory ruins to the east highlighting the remarkable history of the site. The proposed separation and domestication of the grounds, introduction of boundary treatments alongside the new residential units replacing the existing dining hall would have a harmful impact on the special character of the Abbey and Priory ruins, negatively affecting the entire scheduled monument and the way it is perceived and experienced.

279. Of note here is the fact that Historic England have advised that any fencing or other boundary treatments necessary to subdivide the cloister or priory ruins area would require scheduled monument consent. They go on to suggest that they would be unlikely to be able to recommend to the Department for Digital, Culture, Media and Sport (DCMS) that scheduled monument consent (SMC) should be granted for such a proposal as they do not consider that the harm to the significance of the monument that would result would be outweighed by any public benefits.

280. The applicant’s heritage consultant accepts that due to their sensitivity, works to subdivide the Abbey will lead to change within the setting of the Priory and Abbey. They identify the change as having a ‘moderate adverse effect’ with the potential to cause a low level of less than substantial harm. They suggest that the nature of the works to convert the Abbey are such that the

degree of intervention into the fabric is minimal, and the change of use to residential is considered the least harmful option to restore a function to the building and achieve a sustainable and Optimum Viable Use. They also maintain that provision of private garden spaces associated with the Abbey by enclosure with low level hedging, will maintain open views from the publicly accessible gardens while creating privacy for residents, without creating an intrusive sense of sub-division.

281. However, no optimum viable use assessment has been provided to justify the residential use of the Abbey. NPPF paragraph 203 sets out the desirability of finding a viable use consistent with the conservation of a site. Based on the submitted information and potential level of harm, it is hard to justify that the proposal presents the optimum viable use for the grade I listed Abbey and its immediate setting considering the necessary changes that are suggested to accommodate the proposed use. A use that allows the building to remain as a single entity and the land around it undivided would be consistent with its conservation. There is no justification within the applicant's submission as to why this cannot be achieved. The Design and Access Statement claims the size and location as well as the arrangement of rooms makes the Abbey unsuitable for today's market expectations, but this is not substantiated. Any such assessment would be expected to consider the optimum viable use of the site as a whole (as it remains in a single ownership and is being presented as a single application site), rather than approaching the site as a collection of individual buildings/assets. The optimum viable use may not necessarily be the most economically viable one, but it must be the one likely to cause the least harm to the significance of the asset.

282. Officers consider that given the strength of concern and levels of objection raised by consultees in relation to this part of the proposals, that the applicant's heritage consultant's judgement of low level of less than substantial harm is a significant understatement of the actual level of harm which consultees have suggested is a high level of less than substantial harm to the significance and setting of numerous designated heritage assets.

Replacement of dining hall

283. The modern dining hall structure located to the north of the Abbey is proposed to be removed. Nine new dwellings are proposed to be constructed on the dining hall foundations. This forms part of the detailed part of the application and therefore a set of detailed plans have been provided which shows three terraces of three, three-bedroom two storey, red brick and flat roofed dwellings arranged at right angles to each other in very close proximity to the Abbey. The dwellings and their very modest rear gardens and associated parking court are arranged on top of what is assumed to be the extent of the supporting foundation slab for the dining hall (although no investigations are understood to have taken place to verify their extent or suitability for reuse). Other reports that form part of the submission show different arrangements and indicative design/form of dwellings in this location, however they are all arranged within a similar area of what is assumed to be the dining hall pad foundations.

284. The dining hall structure itself does not contribute to the significance of the site and its sensitive removal is supported by Historic Buildings and Place (Ancient Monuments Society) and Historic England, who advise that the works

would also require scheduled monument consent from the Department for Digital, Culture, Media and Sport (DCMS).

285. All of the conservation consultees however go on to raise serious concerns about the proposal to replace the dining room with residential dwellings. Advising that any new-build structures on the floor slab of the dining hall would have an adverse impact on the setting of the scheduled monument and cause harm to its significance.
286. Historic England more specifically comment that the proposed 'new dwellings would be an incongruous addition to the Abbey House and priory ruins. The houses would detract from the relationship of the Priory and ruins and would result in subdivision of part of the scheduled monument with associated management issues. They would also erode the understanding of the site, where the ancillary buildings to the Colman's house are grouped to the south, and not the north of the property'.
287. Historic England do not consider that replacement structures on the floor slab of the dining hall represents the optimum viable use of that part of the site. They consider that a unique opportunity exists within the redevelopment of the site to better reveal and present the full extent of the abbey church which has not been possible since the 1960/70s, something that the Ancient Monuments Society also supports. Historic England consider that the layout of the currently buried archaeological remains of the western end of the priory church could be marked out at ground level (rather than re-exposed) so that they could be clearly read in relation to the existing ruins, Carrow Abbey and cloister and this would represent the optimum public benefit for the monument.
288. Any proposals to introduce new-build elements within the scheduled monument would require Scheduled Monument Consent (SMC) and would have to meet the stringent public benefit test of paragraph 20 of the DCMS Policy Statement on Scheduled Monuments (2013). Historic England have advised that they would be unlikely to be able to support an SMC application for replacement structures on the dining hall site or recommend to DCMS that SMC should be granted for such a proposal.
289. The council's conservation and design officer also has significant concerns that the introduction of residential development over the ruins of the Priory church would affect the evidential, historic and communal values of the monument and Abbey, and their strong interconnection.
290. The applicant's HTVIA however concludes that the proposed development would offer some enhancement to the setting of Carrow Abbey through the replacement of negative contributors, reinstating the historic detachment of the building. They nevertheless identify some residual harm to the Priory and setting of the Abbey through the subdivision of the grounds as this will disrupt one's appreciation of Scheduled Monument and the grade I listed Abbey.
291. The applicant's heritage consultant goes on to highlight that Paragraph 208 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'. It is the applicant's conclusion that the benefits of being able to deliver a viable scheme that will facilitate the

regeneration of the area outweighs the less than substantial harm that they identify to Carrow Priory and its setting.

292. However, it is the judgement of officers, informed by several statutory heritage consultees that the proposal to create a number of separate dwellings on the former monastic site and within Carrow Abbey, subdividing both the monument and house, would result in a level of less than substantial harm at the upper end of the scale, to assets of the highest significance, notably a scheduled monument and grade I listed building.

Adaptations and conversions of industrial blocks on the riverside

293. As mentioned previously, the industrial works was located at a lower site level, adjacent to the River Wensum and several of the buildings, mostly from the later nineteenth century, are grade II listed for their architectural interest, clearly illustrating their industrial function; the historic interest of the Colman's business and group value with other designated buildings.

294. Below is a map extract of part of the site, showing in blue the buildings along the riverside that are proposed to be retained and converted into a range of flexible uses. Building 92, 7/8 and 35 are grade II listed. All buildings in orange are proposed to be demolished.



295. To assess the impact of the proposed adaptation and conversions of Block 92 (Grade II), Blocks 7, 7A, 8A, and 8 (Grade II), as well as the development within their immediate setting including conversions of Buildings 206, 209, 207 and 7 which are all included within the full planning application, more detailed plans, street scene elevations of the proposals and statements of heritage significance would be required. There are specific concerns with regards to the height and design of the proposed extension to the roof of Building 209. The building sits within the setting of a number of designated heritage assets and is currently linked to the listed Block 8. Block 209 already appears visually dominant and an extension of such scale and design would have a harmful impact on the historic setting and negatively affect significant views from the west, such as the one from the locally listed Carrow Bridge. Historic England similarly observe that the three storey roof top addition proposed to this

building could detract from the significance of the historic industrial buildings on the water front.

296. The individual and group value of these assets, their contribution to the street scene facing south and riverside to the north should be considered within the existing architectural and historic context, as well as within the proposed development of potentially greater scale and heights to the east.

Development across the wider site

297. One of the important characteristics of the site is the distinctive characters of the Abbey site and the industrial works. The dramatic change in gradient between the Abbey and works site provided a successful separation between the factory and domestic parts of the site.
298. Development proposed across the wider industrial works site forms part of the outline proposals. Here the considerations are of higher-level details contained within a set of parameter plans which look to determine land use, proposed building heights, public open space, access and movement and extent of demolition. A detailed Design Code also forms part of the outline consideration.
299. There are concerns regarding the heights and footprints of the proposed blocks and how these would impact the character of the scheduled monument, the setting of other existing designated heritage assets (both within and outside of the site) and significant views within and beyond the application area. The 'Assessment of Operational Visual Effects' (Section 9 of the HTVIA) display how the new development would inevitably alter existing views. Some of these views raise significant concerns with regards to harmful impact on the setting of Carrow Abbey, Priory and views from Carrow House. Whilst a change is anticipated and to be expected, it appears that further studies would be necessary to ensure that the impact is carefully assessed, and potential harm mitigated in order to preserve the secluded and tranquil character of the unregistered historic park and garden of local significance which accommodates this unique cluster of heritage assets.
300. Historic England advise that there is clearly more scope for considerable development on the works site. However, care should be taken as any visual intrusion from tall buildings on the works site, into the historic core of the site would be harmful to its secluded and domestic character. Verified views currently appear to show the outline of the development rising above the tree line in views from the Abbey gardens. Overly dominant tall new buildings would also detract from the historic industrial structures on the riverside. Clearly, the impact of heights and their specific arrangement in proximity to more sensitive heritage assets needs further careful consideration before the height parameter plans and content of the Design Code can be accepted.
301. Putting concerns around height of new elements aside, there is also a concern that the location and interrelationship between individual assets has not been given sufficient consideration. New development is proposed in areas which interferes with the relationship between existing assets and interrupts the way elements are accessed and appreciated by the wider public. For example, the sunken garden could become separated from other assets by intervening private uses and although forming a part of the site which will act as public

open space it would appear difficult to access with limited linkage and legibility from other wider areas of open space.

302. The repositioning of roads and access routes around the Abbey appears to interfere with, rather than enhance and better reveal the significance of the ruins, the principal approach to the sunken gardens from the east, and the established links with other heritage assets within this historic setting. The link with Carrow House and its grounds is not shown or integrated to the proposal. Whilst opening up the Abbey grounds and the scheduled monument to pedestrian access and further enhancing the assets' accessibility and interpretation is strongly supported, it is recommended that introduction of new public highways should carefully consider the existing heritage assets on site, the potential impact on management and maintenance of the assets, and their relationship with other buildings and sites within the application site and beyond.
303. There is limited/no information as to how some of the wider heritage assets fit into the wider plans for the site. Information regarding the air raid shelters is limited and does not seem to form part of the scope of works for the development proposed. This raises questions around long term management and maintenance of some of the assets and the ability to appreciate their contribution to the history and use of the wider site and its gardens and any heritage interpretation, something that also concerns the Norfolk Gardens Trust.
304. On a specific point relating to the detailed part of the application, the formation of a new vehicular access on to Bracondale would require the removal of a section of flint boundary wall (a continuous feature along much of Bracondale, as identified in the Bracondale Conservation Area Appraisal) and a number of trees and vegetation, which would have adverse impacts on the character and appearance of the Bracondale Conservation area that remain unquantified by the applicant.
305. Finally, there are some areas of the site that are part of the outline application that conservation consultees consider further detail should be provided. This includes development within the current car park area on the southern approach to the Abbey and Gardeners cottage and development in place of the technical block to the south west of the Abbey. The concerns here surround development which is replacing existing development to be removed which contributes to the significance of the 'country house' and the approaches to the Abbey once it is opened up through demolition of existing structures. There is detail within the Design Code around these areas and clearly how any development in these areas impacts on the setting and significance of the Abbey and its grounds in particular need further detailed consideration. However, at this stage there are significant issues with the proposals surrounding the use of the Abbey and the dining hall removal itself that remain the primary focus to be resolved before a holistic approach to development in these wider areas can be fully considered.

Heritage Conclusion

306. The Carrow Works site presents a once in a lifetime opportunity to create a vibrant new quarter for the city of Norwich that responds to and enhances its rich historic environment. A holistic approach to develop a scheme which seeks to sustain and enhance the significance of this unique collection of highly

significant heritage assets would do much to create a truly distinctive and successful new quarter for the people of Norwich. Although heritage consultees support the principle of regenerating the site the current submission fails to respect or appropriately respond to the sites heritage by re-purposing the sites heritage assets and opening the site up to public use in a way which improves their setting and maintains an appreciation of their significance.

307. Paragraph 205 of the NPPF requires ‘great weight to be given to a designated heritage asset’s conservation, and the more important that asset, the greater the weight should be.’ Because of the exceptional importance of the site reflected in the scheduling, grade I listing and other listings and designations, great weight should be given to its conservation, irrespective of the level of potential harm to its significance.
308. The NPPF at paragraph 206 requires there to be a clear and convincing justification for any harm to, or loss of, the significance of a designated heritage asset. The individual buildings comprising the application site are distinguished by their significant architectural and historic interests; moreover, the group value of all heritage assets deriving from their links and associations with each other and this unique context, further reinforces their significance. The proposals have been found to result in high levels of harm to the setting and significance of a number of designated and non-designated heritage assets. The high levels of individual and cumulative harm caused is ‘less than substantial harm’, which is without clear and convincing justification and is not sufficiently outweighed by public benefits, and as such the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024, policy DM9 of the Development Management Policies Local Plan 2014, paragraphs 201, 203, 205, 206 and 208 of the NPPF and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Main Issue 6. Design

309. Key policies and NPPF sections –GNLP2, GNLP3, GNLPSTR.01, DM3, NPPF sections 8, 11 and 12.
310. The NPPF says in paragraph 131 that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.” Paragraph 139 says “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design”.
311. Revisions to the NPPF in December 2023 further emphasised the importance of ‘beauty’ in design. However, there is still no definition of beauty in the glossary to the NPPF. The Oxford English Dictionary definition is: “A combination of qualities, such as shape, colour, or form, that pleases the aesthetic senses, especially the sight”. This implies that beauty elicits a positive emotional response, but this can be subject to a considerable amount of subjectivity. Beauty is treated as a component of well-designed places in the NPPF and a place can be considered well-designed in planning policy terms if it meets relevant design policies and has been assessed using processes that are endorsed by government. This assessment is structured around the government’s framework for design evaluation as expressed in the National Design Guide and National Model Design Code.

312. Developments should be sympathetic to local character and history and establish or maintain a strong sense of place (NPPF paragraph 135). Policy DM3 states that all development will be required to be designed with regard to the character of the surrounding neighbourhood and the elements that contribute to its overall sense of place and goes on to set out the design principles against which development proposals will be assessed. Adopted development plan policies along with the NPPF therefore establish a strong basis for schemes which are poorly designed and which fail to take the opportunities for improving the character and quality of an area to be refused planning permission.
313. Policy GNLP2 requires development proposals to create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes). The council does not currently have a design code in place for this or any other part of the city. The planning application however is supported by a detailed site specific Design Code which has been brought together by the applicant's project team to inform the outline part of the application in particular. This is clearly a detailed document that attempts to offer clear design guidance for the development when considered alongside the Design and Access Statement and outline parameter plans. The NPPF paragraph 134 promotes the production of design guides and codes, including those produced by developers in support of their planning application. It is not clear in this instance whether effective community engagement suggested in the NPPF has taken place as part of the production of the document. There is also a lack of reference within the applicants Design Code to the governments National Design Guide or National Model Design Code which are intended to inform design process and the tools required to achieve the high quality places that the NPPF requires the development process to strive to achieve. The local planning authority was aware of the production of the document, however opportunities to review and engage in constructive feedback both at pre-application and formal planning application stage have been limited due to an unwillingness of the applicant to engage in discussions. As a result, although there may be details within the code that could be agreed, all of the detailed content of the document cannot be agreed at this time.
314. The applicant's Design Code builds upon the submitted outline parameter plans and there are fundamental elements of those plans that are not agreed. There are also some observed conflicts between the parameter plans and the Design Code to the extent that approving the high level content of the parameters plans would render some of the principles and elements of design detail that the Design Code is seeking to agree not possible and vice versa.
315. The Design Code for example contains a Regulatory Plan which is an integral part of the Design Code and informs all subsequent sections of the Code and all reserved matters applications must comply with. The Regulatory Plan is based on an access strategy that the highway authority does not currently find acceptable.
316. For a mixed use development of this scale and strategic importance assessment against the Building for a Healthy Life Assessment Framework and regard to outcomes of an independent design review panel would be particularly important as paragraph 138 of the NPPF suggests. There is nothing within the applicant's submission however that suggests that either of

these important review and evaluation mechanisms have been utilised to inform the design evolution of the development. However, given the significant concerns around many interrelated aspects of the application and the lack of discussion and engagement from the applicant and their project team it was not considered necessary to refer the scheme through such design review mechanisms. The scheme is significantly poor such that it was felt these initial conclusions on design could be drawn by the local planning authority.

317. More of the fundamentals of the application surrounding heritage and access and movement need to be resolved together with any necessary amendments to the Design Code before the beautiful and well-designed exemplar of high quality, high density and locally distinctive design which respects its context and setting can be confirmed to be achieved on this site. While those issues remain unresolved it cannot be concluded that the design of the development in its entirety fully respects or enhances the character and context of the local area. The application is therefore contrary to policies GNLP2, GNLP3 and GNLPSTR.01 and DM3 and the design principles as set out in section 12 of the NPPF.

Main Issue 7. Transport and movement

318. Key policies and NPPF sections – GNLP2, GNLP4, GNLP7.1, GNLPSTR.01, DM1, DM3, DM12, DM13, DM28, DM30, DM31, DM32, NPPF paragraph 8 and Section 9.
319. The application proposes a significant level of new development to the southeast of the city centre on one of the main approaches into the city from the southern bypass A47 and A11. Paragraph 109 of the revised NPPF states 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.' Policy DM28 in accordance with the NPPF encourages sustainable travel - requiring new development to incorporate; cycle and pedestrian links, maximise accessibility and permeability, appropriate and safe levels of parking, travel planning and car club provision.
320. The location of the site at the southeastern edge of the city has the potential to afford a high degree of accessibility by all modes of travel, including by walking and cycling, local and county bus routes and by car. The proximity of the site to; employment, shops, a wide range of facilities and services, creates suitable conditions for promoting sustainable travel behaviour by both future occupiers of and visitors to the development. Policy GNLP2 states that proposals should ensure safe and convenient access for all, encourage walking, cycling and public transport to access on site and local services and facilities.
321. The comprehensive re-development of this site provides the opportunity for further improving access to this part of the city. Improvements to further promote and prioritise active travel between the city centre and the Broads at Whitlingham Country Park as the GNLP site allocation policy GNLPSTR.01 requires are a fundamental consideration for any new development at this site.
322. The site has historically had very limited public access. For security reasons access for vehicles, cycles and pedestrians has been limited to gated access via the main site entrance from the Martineau Lane/Bracondale roundabout. At points in the past there has also been access to the site for all

from Papermill Yard and pedestrian access from Carrow House via pedestrian foot bridge and emergency vehicular access from the site into the car park for Carrow House. However, all of these accesses are now closed, although more limited access rights (pedestrians/cyclists and emergency vehicles) are understood to remain at the Papermill Yard access point.

323. Transport and access are matters scoped into the EIA and impacts are considered in Chapter 7 of the Environmental Statement. A Transport Assessment (TA) has also been submitted with the application. Even though paragraph 117 of the NPPF suggests that all developments that will generate significant amounts of movement should provide a travel plan so that likely impacts of the proposal can be assessed, no supporting travel plan has been provided and the applicant maintains that such information can be secured by planning condition.

324. Limited discussions took place between the local planning authority and highway authority and the applicant's consultants around the significant matter of providing an appropriate access strategy for the proposed development including a visit to site, prior to the submission of the planning application. A great deal of the issues that were raised prior to submission have either not been acted upon or have not been considered in sufficient depth. As a result, the Transport Assessment that has been provided in support of the application has been found by the highway authority to be deficient in a substantial number of areas as discussed in the remainder of this section. Therefore, the development proposals and access strategy appear to have unfortunately been informed without adequate levels of appropriate information and evidence about the site and the operation of the local highway network.

Vehicular access

325. Located directly off the outer ring road and due to the former/existing site use, the focus of access to the site to date has centred around access for vehicles. Although access by other non-car modes via this point is possible there is a clear need to improve and seek to increase priority of access to the site by public transport and non-car modes in this location.

326. It is recognised that at times in the past the site has produced quite significant trip generation associated with a significant workforce working on a shift basis, together with associated HGV traffic. That intensity of use however declined in more recent years and although still in employment use the site currently generates trips at much-reduced levels compared to previous peak site usage. The highway authority in assessing the applicant's submission has some reservations around some of the assumptions and adjustments that have been made to the trip generation data. Junction capacity assessments have not been provided in support of some of the report recommendations and full modelling of junctions has not been carried out to inform suggested off-site highway mitigation measures.

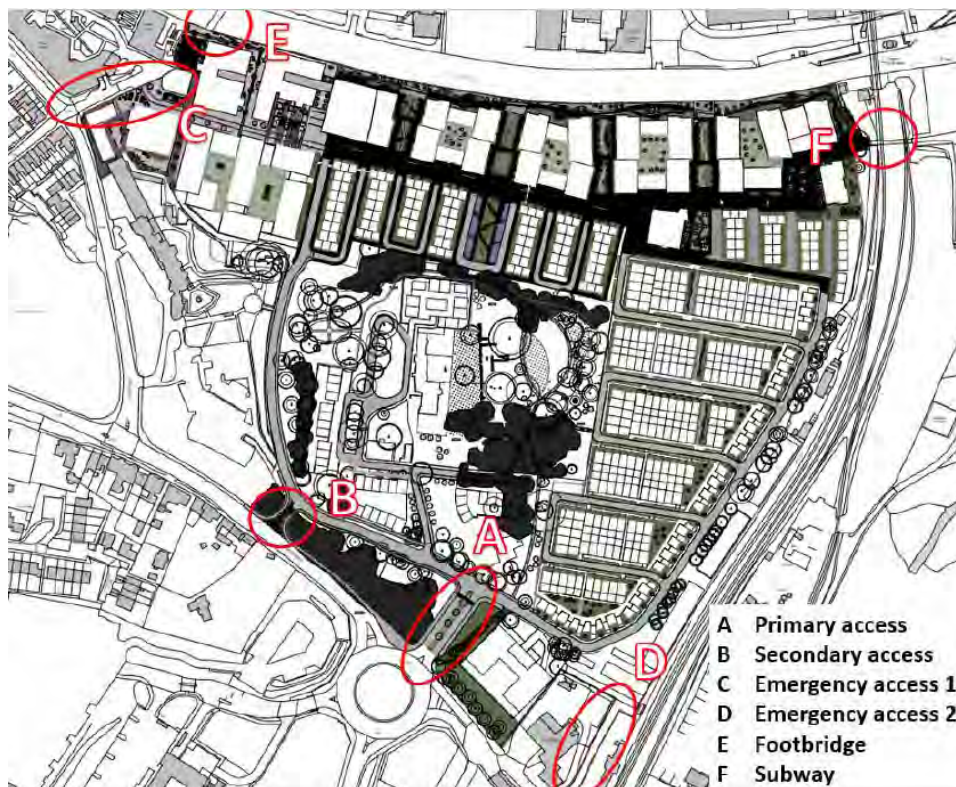
327. The Transport Assessment suggests that primary access to the site will be via a remodelled existing access from the Martineau Lane/Bracondale roundabout to the south. The access will consist of two separate but parallel 5.5 metre wide carriageways separated by a 3 metre wide central verge together with a 3 metre wide footway/cycle way provision alongside each carriageway. The applicant maintains that the arrangement proposed for this access will be sufficient to act as a single point of access to serve the quantum

of development proposed and will provide sufficient resilience to allow access to the site to be maintained in the event of one carriageway becoming blocked.

328. The Highway Authority however do not consider that the location of the site at a busy part of the strategic road network is suitable for the arrangement proposed to serve as a single point of vehicular access to the site together with adequate access arrangements for pedestrians and cyclists, for the amount of development proposed. They advise that the access layout would result in a highway safety concern and for this reason is not acceptable.

329. In addition, what is described as a 'secondary access' is proposed onto Bracondale, approximately half way between the roundabout and the King Street junction. The applicant's consultants suggest that an all movements junction 'would not be desirable' here and therefore a left turning exit design is proposed which they suggest would restrict general use of this secondary access resulting in it being lightly used under normal conditions. It is understood that the primary purpose of this junction is to provide an alternative temporary access for all should the main access be unavailable. As Bracondale is a strategic transport route, an access in this specific location that introduces additional slowing, stopping, and turning movements at this corridor of movement would not be acceptable and is considered a highway safety concern. The highway authority considers that not only is the principle of a junction at this location unacceptable, the junction form proposed is also inappropriate. Also of note here is that the formation of a new access in this location would require the removal of a section of flint boundary wall (a continuous feature along much of Bracondale, as identified in the Bracondale Conservation Area Appraisal) and a number of trees and vegetation, which would have consequential adverse impacts on the character and appearance of the Bracondale Conservation area.

330. An extract showing the applicants access strategy is reproduced below to provide a visual aid of where the access points are located.



331. The applicant maintains that a single point of access to the site from the roundabout (point A) of the design proposed should be an acceptable sole means of access to the site for vehicles. The 'secondary' access that is also proposed (point B) can be secured without the need for agreement with third parties. Policy GNLSTR.01 is quite explicit with its requirement for a second point of access, suggesting access to King Street, although a Transport Assessment would be required to determine the exact location of a second point of access. However, in the absence of a satisfactory Transport Assessment, the highway authority maintains at this time that two, all movements, all vehicle accesses to the proposed development are required to ensure resilience of access to the site.

332. What is clear however, is that the vehicular access(s) to the site, its type and location need to be considered equally within an access strategy which considers all other access modes, existing provision and improvements required to create a 'sustainable' development.

Parking strategy

333. The Transport Assessment goes on set out the car parking provision as summarised in the table below, alongside the parking standards set out in the current Norwich Development Management Policies Local Plan;

334.

	Proposed parking provision in planning application	Norwich City Council Policy DM31 requirement <i>(based on an 'accessible' high quality public transport corridor or 100m of a district centre)</i>
Flats	0.20 spaces per dwelling	Same as for houses.
Houses	1 space per dwelling 1 EV charging point in all communal unallocated parking areas EV charging in all garages	Min – 0.5 spaces per dwelling Max – 1.33 spaces per dwelling. Min 25% 'on street' or in communal parking areas and not allocated. Not more than 20% provided as individual garages.

	Proposed parking provision in planning application	Norwich City Council Policy DM31 requirement <i>(based on an 'accessible' high quality public transport corridor or 100m of a district centre)</i>
Commercial (Class E)	1 space per 500sqm 5% disabled	Min – 1 space per 500sqm. (Based on former Class A retail uses) 5% disabled 5% parent and child Secure motor cycle parking at an amount equal to 5% of level of car parking Max – 1 space per 20sqm
Industrial (Class B2/B8)	1 space per 750sqm 5% disabled	Min – 1 space per 1000sqm Max – 1 space per 50sqm
Food store	1 space per 50sqm	Same as for Class E

335. A total of 734 car parking spaces are proposed across the whole site, with provision for both residential dwellings and commercial space. The parking provision suggests 129 spaces for a proposed food store and employment. This leaves 605 spaces for all of the residential units, an average of 0.3 spaces per dwelling. Within some housing typologies, there is private parking provided within a garage. For flats, the parking is located within central car park areas.

336. Policy GNLP2 and policy DM32 of the Norwich Development Management Policies Local Plan suggest in the most accessible locations in Norwich, regard should be given to providing low or car free housing.

337. The proposed car parking levels fall generally within the minimum and maximum ranges for relevant use classes for development in this part of the city if the site was to be considered as being on a high quality public transport corridor. For this to be the case improvements to access to public transport provision will be required as discussed later. The applicant describes the development as a 'low car scheme' with parking supplemented by car club access and cycle parking in accordance with the councils parking standards. The level of car parking for the apartments is particularly low and further detail would be required to demonstrate that it is appropriate in this location alongside appropriate and quite significant improvements to active travel measures to reduce car dependence before it is accepted at this site (covered in more detail in the remainder of the section).

338. A number of consultees have commented that due to the proximity of the site to Carrow Road football stadium which frequently attracts over 25,000 supporters and based on evidence from residential sites in the area (some as far from the site as Trowse village), managed parking restrictions are likely to be required across the site to prevent parking conflict and the blocking of access for emergency vehicles and active travel users. The TA does not acknowledge that the proximity to the football stadium could raise these issues (with or without a bridge connection across the River Wensum), nor the sites proximity to a large scale employer at County Hall and a large district retail centre at Riverside which could also create parking pressures in and around the site, and this would need to be dealt with through a combination of site layout and travel management/parking management/road adoption matters.
339. The closest car club vehicles are currently located adjacent to Carrow Road Stadium and on King Street. The proposals suggest provision of a new car club and space in an accessible location on a ratio of one space for every 200 dwellings (9 spaces) initially increasing to 1 space per 100 dwellings subject to demand (18 spaces). Although not perhaps necessary to establish a new car club, expansion through additional spaces or contributions to expand the vehicle provision within the existing car club arrangements will be required for a development of this scale.
340. The detailed aspects of the development relating to transport and movement that form part of the full application are confined to the principal means of access and primary internal road, plus associated public spaces and public realm along this road. The primary street and bus route is referred to several times throughout the TA as a perimeter or loop road which will use the existing Carrow Works carriageway with modification to provide footways. Taking this approach of designing the development around an existing road originally designed for access around an industrial site could lead to the highway infrastructure presenting a dominant barrier to development. Rather than designing a layout with a pattern of beautiful streets that support healthy and sustainable communities, through safe, legible, walkable areas as a starting point.
341. As a significant part of the site forms part of the outline proposal it is not possible to consider in detail elements of the development such as road and street layout or parking location. The Design Code relates primarily to the outline aspects of the application and contains sections on the principles of street design including street sections, surfacing, landscaping and parking arrangements, but no specific layout. The Design Code contains a Regulatory Plan which informs all subsequent sections of the Design Code which all reserved matters applications must comply with. The Regulatory Plan is however based on an access strategy that the highway authority does not currently find acceptable.

Pedestrian, cycle and emergency vehicle access

342. National Cycle Network Route 1 (NCN1) runs past the south and west of the site from the city centre. The route is part designated shared path and part signed on road provision on a busy part of the road network that often experiences queuing traffic due to congestion.
343. An access for pedestrians, cyclists and emergency vehicles will be provided from Papermill Yard, off of King Street. Although Papermill Yard is private in

part it is understood that access rights remain to the Carrow Works site, but that they do not extend to providing general vehicular access.

344. There also exists an emergency access in the southeast of the site (currently gated, overgrown and un-used) to the east of Carrow Fire Station. The access is no greater than 5.5 metres in width and it is proposed could serve as a further pedestrian/cycle link which could be used by emergency vehicles.
345. Policy DM3 states that 'proposals should be designed to provide a permeable and legible network of routes and spaces through the development, which takes account of public accessibility, links effectively with existing routes and spaces and minimises opportunities for crime, disorder and anti-social behaviour. The public realm should be designed so that it is attractive, overlooked, safe and secure.'
346. More specifically related to this site, policy GNLP7.1 and GNLPSTR.01 emphasise sustainable accessibility and traffic restraint which allows for connectivity and permeability within and between the ENSRA sites and beyond.
347. A key element of policy GNLPSTR.01 is a high quality east-west pedestrian/cycle route through the site connecting King Street (and the city centre) to the railway underpass (and onwards to the Broads at Whitlingham Country Park). The application in this respect proposes a semi-pedestrianised 'balanced street' which serves as a means of vehicular access, while making provision for pedestrians and cyclists. The northwestern most part of the route is however proposed for pedestrian and cycle access only.
348. The applicant's illustrative masterplan, part of the Design Code lists 'new and improved walking and cycling connections through the site including a new foot/cycle bridge over the river' as one of the key features. The application makes reference within its supporting Transport Assessment that the bridge forms part of the development, with land safeguarded within the site to ensure the southern bridge landing point. However, the document acknowledges that approval from a third party will be required in respect of the landing point on the northern side of the river. Also, there is no information with regards the detail of the bridge, its exact location or its design, with a suggestion that the delivery of the bridge is expected to be secured by S106 agreement.
349. Similarly, reference is made within the Transport Assessment to the upgrading of the railway underpass/subway to provide a link to the Deal Ground forming part of the proposed development which is expected to be secured by S106 agreement.
350. Another key element of policy GNLPSTR.01 involves opening up the riverside for public access, via provision of a riverside walk. The parameters plans and other illustrative material shows an 'indicative' route along most of the riverside edge to the site, with the exception of a short section alongside existing grade II listed building 7, the 'F block' which is to be retained. There is no suggestion as to whether opportunities to provide a continuous route along the whole riverside frontage have been explored by taking the route within the building or by provision of a cantilevered walkway, which would deliver a much more satisfactory and more legible route for users.

351. The TA explains that 'the site is well placed to promote travel on foot and by cycle and goes on to state that the development will deliver a new footbridge over the River Wensum and open up the subway beneath the rail line, which will reduce travel distances to key facilities'. However, there is nothing within the submission to secure the delivery of these extremely important linkages or suggest that any discussions have taken place with any adjacent landowners to agree such linkages in principle, therefore they remain nothing more than an aspiration. This remains a fundamental omission from the submission. As Active Travel England suggest 'the applicant must demonstrate an absolute commitment to the expansion of active travel routes' and these connections points are a quite fundamental part of achieving this.

352. There is a clear policy requirement through policy DM3 and GNLP4, GNLP7.1 and GNLPSTR.01 to secure accessibility, permeability and linkages to, from and throughout this development. However, based on the information available within the submission this has not been clearly demonstrated as being possible.

Public transport

353. With regards public transport provision there are three bus stops located within a 5 minute walk from the centre of the site. One of the south bound stops on the section of Bracondale towards Trowse village is only served by a limited number of local services. The other two stops (one north bound into the city and one south bound) are served by a greater number of bus services that pass the site and provide access to the city centre and out of the city and to the east of the county, of a frequency of no greater than every 30 minutes. However, to make the development accessible to public transport it is suggested that a circular 1.2 km bus route around the sites perimeter road with three bus stops at 400 metre intervals will ensure access to a bus service within 200 metres. They estimate that this will require a five and a half minute extension to a bus service which passes the site and although they suggest that contact has been made with the relevant bus operators no formal agreement to provide a service has been provided by the bus companies.

354. Norwich Railway Station is located around 1.5 kilometres to the north of the site, which is a 20 minute walk or 8 minute cycle from the main site entrance. Much of the existing cycle and walking route however is alongside busy sections of road which does not currently make for a particularly pleasant user experience. Network Rail are also concerned that there is no mention in the submission of a travel demand forecast for Norwich Station to determine potential impacts on passenger capacity at Norwich Station.

355. The highway authority has advised that the Transport Assessment provided with the application is deficient in a substantial number of areas. It fails to demonstrate an acceptable access strategy; it does not justify development trips or provide full traffic flow diagrams to assess development impact or identify appropriate off-site highway mitigation. It also includes assumptions based upon delivery of infrastructure that is dependent on third party land. As a result, the Transport Assessment provided fails to demonstrate that the highway network would continue to operate safely without severe residual cumulative impact and in accordance with the requirements of paragraph 115 of the NPPF refusal of the application is recommended on highways grounds.

356. The application is not supported by sufficient highways and transport information to demonstrate that the proposed development and its points of vehicular access in particular will not be prejudicial to the safe and satisfactory functioning of the highway, contrary to policies GNLP7.1 and GNLPSTR.01, DM30, NPPF paragraph 8 and Section 9.

357. The proposed development does not provide adequate access or new or improved on and off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to encourage walking and cycling/wheeling to connect with and permeate through the site and link with adjacent sites and local services. It also fails to demonstrate that improved public transport access to the site can be achieved, to maximise sustainable transport opportunities which together could lead to reduced car dependency and a corresponding reduced level of car parking provision across the site. , The application is therefore contrary to policiesGNLP4, GNLP7.1, GNLPSTR.01, DM3, DM12, DM13, DM28, DM30, DM31, DM32 and NPPF paragraph 8 and Section 9, including paragraph 115.

Main Issue 8. Social and economic infrastructure

358. Key policies and NPPF sections - GNLP4, GNLP6, GNLP7.1, DM1 and NPPF section 8.

359. The Environmental Statement (ES) submitted with the planning application includes an assessment of the socio-economic impacts of the proposed development (Chapter 15). The assessment looks at impact relative to a baseline position in terms of the demographic and economic profile of the local population and provision of education, healthcare facilities and community facilities including open space, play space and sports provision across the area surrounding the site. The assessment examines the potential effects of the development over the construction and operational phases.

Employment

360. As the site is currently largely vacant a rough figure based on the Employment Densities Guide has been determined for employment within warehouses, which could accommodate 416 jobs. Approximately 416 FTE jobs have already been lost from the site due to the closure of the Unilever factory. However, in the past, operations at the site will have generated jobs for a significantly greater number of employees.

361. The ES suggests that employment will be generated through the construction of the proposed development which the ES has identified will provide 73 FTE jobs (not sure if this is a figure for the entire 10 year period or an annual figure). The proposed development is reported to bring forward net additional operational employment (following displacement, leakage and multiplier effects) of 320 – 1,025 FTE jobs associated with the new commercial and industrial areas of the development. The ES suggests a minor beneficial impact in the short term to moderate beneficial impact in the long term of employment generation. Officers have questions around some of the data and the age of figures used but it has not been possible to resolve these queries.

362. As a mixed use development the hybrid planning application proposes a flexible mix of business and commercial (including retail uses), hotel, residential institution, learning and non-residential institutions, local community

uses, general industrial, storage and distribution. However, the exact additional employment contribution that the development provides compared to the existing/current site usage has not clearly been demonstrated. If accepting the applicant's figures for net additional operational employment, and taking the higher end figure, over 1,000 jobs would contribute in a relatively substantial way towards the 4,100 jobs target for East Norwich (ENSRA). The opportunities for jobs creation lacks some certainty and therefore more limited weight should be given to the contribution that the development would make in meeting the requirements of policy GNLP7.1 and GNLPSTR.01.

Crime

363. The ES baseline assessment identifies the site to be in the 40% least deprived areas nationally in terms of crime deprivation. The ES suggests that the development will follow design principles to discourage crime and promote building security through maximising natural surveillance, providing territorial reinforcement and ensuring well maintained places are provided by a management company.

364. Norfolk Constabulary consider that the proposed development represents a very large-scale development that will significantly increase pressure on police resources. To enable Norfolk Constabulary to enhance police infrastructure to support the NPPF aim to create safe communities and ensure that crime and disorder, and the fear of crime, do not undermine the quality of life in the new development, Norfolk Constabulary consider it necessary and justified that a contribution based on a development of up to 1,859 dwellings of £168 per dwelling (in total £312,312 - index linked) is provided by the developers and should be delivered by s106 agreement. This will ensure that the developer contributes to additional necessary infrastructure required to maintain and deliver a safe and secure environment and quality of life (and limit crime and disorder and the fear of crime) for future residents and to meet planning policy requirements.

365. Policy GNLP4 deals with 'other strategic infrastructure' and states that 'The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including Police infrastructure'. The policy refers to an appendix which sets out the infrastructure requirements to serve growth, which will be 'provided by a variety of organisations through varied funding sources' and therefore does not explicitly suggest that such infrastructure will be funded directly by the development in the plan. Any additional contributions for the funding of facilities secured through planning obligations will need to take account of development viability; be necessary to make the development acceptable in planning terms; be directly related to the development; and be fairly and reasonably related in scale and kind to the development. Potential contributions to the provision of police infrastructure would need to be balanced against requirements for other essential infrastructure and community benefits, including provision of affordable housing.

Education

366. Policy DM1 requires provision to be made for accessible education opportunities and NPPF paragraph 99 requires sufficient choice of school places through creation, expansion or altering schools to meet the needs of existing and new communities.

367. The GNL strategic policy GNL4 requires school capacity to be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including primary schools on strategic development sites. Policy GNL7.1 confirms that an area wide Supplementary Planning Document (SPD) will provide the framework for seeking social infrastructure and site allocation policy GNLSTR.01 specifically requires at point (h) 'Provision of a serviced site for a two form entry primary school'.
368. The baseline education capacity as set out in the applicant's Environmental Statement predicts that the proposed development could generate a total of 954 children. Of these pupils, 489 will be aged 3-4 years (52%), 330 will be aged 5-11 years (34.7%) and 139 will be aged 12-18 years (12.4%).
369. The baseline assessment identified capacity for an additional 478 pupils across the 7 primary schools within a 1.5-mile radius. The figures suggest that these will have sufficient capacity for the 330 pupils brought forward by the proposal.
370. The same assessment suggests the proposed development is anticipated to bring forward 139 pupils aged 12 to 18 years who will require secondary school places. The baseline assessment identifies that the two secondary schools within 2 miles of the site, currently have capacity for 873 secondary school students with an average capacity of 58.8%. Therefore, the figures suggest that there is sufficient capacity to accommodate the additional secondary school pupils.
371. Again, the same assessment suggests the proposed development is anticipated to bring forward a number of new pupils who will require SEN (special educational needs) school provision. The report suggests that given the existing provision and the funding in place for two new schools, the total number of these pupils is likely to be accommodated within the existing specialist provision.
372. The ES also identifies that there is unlikely to be sufficient early years education capacity to accommodate the potential 486 additional 3-4-year-olds in the area resulting from the proposed development.
373. The ES does go on to consider cumulative impacts of the development alongside committed developments at Anglia Square (extant planning permission exists), Deal Ground (with an extant outline planning permission) and Land to the north of Carrow Quay (now complete). The cumulative schemes are anticipated to bring forward 893 pupils aged 3 to 7 years; 594 pupils ages 5 to 11 years; 240 pupils aged 12 to 18 years; total 1727 pupils. It identifies that there will be a permanent Moderate Adverse to Major Adverse impact in the long term on early years and there will need to be additional provision. Also, there is anticipated to be a Moderate Adverse long term impact on primary schools with provision of additional school places required. Whereas secondary schools have sufficient capacity with an anticipated impact to be permanent 'Moderate Beneficial' in the long-term as it is likely to increase numbers within local secondary schools that have capacity. The ES proposes that education impacts will be mitigated through provision of S106 contributions.
374. To supplement their submission an Education Impact and Mitigation Assessment was undertaken and provided by consultants on behalf of the

applicant. The information within this report appears to be more specifically related to Norwich, with use of some figures obtained from the local education authority. The report concludes that there will be a surplus of places in primary and secondary schools by the academic year 2025/26 through to 2031/32, summarised below;

- 2025/26 - Primary school places (within 2 mile walking distance) = 690
- 2027/28 - Primary school places (within 2 mile walking distance) = 557
- 2029/30 - Primary school places (within 2 mile walking distance) = 533
- 2031/32 - Primary school places (within 2 mile walking distance) = 475
- 2025/26 - Secondary school places (within 3 mile walking distance) = 457
- 2027/28 - Secondary school places (within 3 mile walking distance) = 321
- 2029/30 - Secondary school places (within 3 mile walking distance) = 523
- 2031/32 - Secondary school places (within 3 mile walking distance) = 815

375. It however only looks at forecast capacity within existing local schools. It does not consider within these forecasts the specific demands that the proposed development or the cumulative impacts that other large scale committed developments in Norwich will have on capacity within those local schools as the ES does.

376. The applicant has chosen to concentrate on the forecasting surplus identified in their Education Impact and Mitigation Assessment to suggest that there are no constraints regarding local education infrastructure to necessitate the provision of a two form entry primary school on the site. However, if any shortfall of places is identified they suggest this can be funded through CIL receipts.

377. Together the information provided around education within the ES and the Education Impact and Mitigation Assessment should be considered with caution. Many of the figures around school capacity quoted within the ES vary by a significant margin from those quoted within the Education Impact and Mitigation Assessment and those provided by Norfolk County Council as education authority. The methodologies used within the ES are very generalised and do not relate specifically to the area (for example Greater London Authority pupil product ratios are used). As a result, it appears that the number of children generated from the development is likely to be an overestimate, but also the assessment of existing school capacity is an overestimate using a much wider catchment of schools than the education authority considers relevant and does not take into account matters such as parental preference.

378. The table below summarises the differences in the data provided by the applicant and that provided by the local education authority.

Children generated from development	Applicants' data within Environmental Statement	Norfolk County Council data (based on delivery of 904 homes, does not include provision associated with 1 bed units and 50% contribution from multi bed flats)
Early Education	489 (3-4 years)	72 (2-4 years)
Primary	330 (5-11 years)	254 (4-11 years)
High School	139 (12-18 years)	131 (11-16 years)
Sixth Form (16-18 years)		14
SEND (special educational needs and disabilities, 0-25)		9.04
TOTAL	958	471(+9.04)

379. Norfolk County Council Children's Services have provided detailed comments on the application, including information of children generated from the development and capacity at existing schools. They use local knowledge and Norfolk specific data, and their modelling is applied consistently across all sites in Norfolk. They have considered the development alongside existing commitments at Anglia Square and Deal Ground and conclude that the development will require mitigation for;

- 15 Early Education places,
- 254 Primary School places,
- 14 Sixth Form places and
- a pro-rata SEND contribution.

380. As a result, they advise that land for a new two form entry (2FE) Primary School will need to be secured through a Section 106 agreement. As the application does not currently provide this required mitigation in a location agreed with the County Council, Children's Services object to the application.

381. Work that has taken place to date on the ENSRA, the GNLP policies, the site masterplan and draft SPD has consistently identified a need for new social infrastructure including a new primary school. Children associated with a development of the scale of East Norwich, together with other commitments cannot be accommodated within existing schools or through increasing capacity at existing schools. The children's needs should be met on site within a new school which meets part of the social infrastructure needs of the development as set out in policy GNLPSTR.01.

382. There is no provision within the application for social infrastructure in the form of a serviced site for a two form entry primary school on this strategic development site. The application is therefore contrary to policy GNL P4, and GNL PSTR.01 which have parallels with the requirements of paragraph 99 of the NPPF which requires sufficient choice of school places with great weight given to the creation, expansion or altering schools to meet the needs of existing and new communities. The application is also contrary to DM1 which requires provision to be made for accessible education opportunities.

Healthcare

383. Policy DM1 requires provision to be made for improved health and well-being opportunities. Also NPPF paragraph 97 requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.

384. Policy GNL P4 requires improvements to healthcare infrastructure. Policy GNL P7.1 confirms for the ENSRA that an area wide SPD will provide the framework for seeking social infrastructure and site allocation policy GNL PSTR.01 specifically requires at point (i) 'Provision of land for a health facility sufficient to serve the East Norwich development as a whole'.

385. The ES baseline assessment and Health Impact Assessment identifies 8 GP surgeries within 1.5 miles of the centre of the site. The proposed development will increase the GP-to-patient ratio to 2,024 patients per GP which is above the best practice of 1,800 patients per GP. Therefore, the report identifies that there is not sufficient capacity to provide for the additional residents that the development will create, resulting in a permanent, long term Minor Adverse impact.

386. Limited information is provided on adult social care, except to acknowledge that a proportion of the average 4,461 residents that the development will create, are likely to use Adult Social Care services, resulting in a permanent, long term, Minor Adverse impact. The ES concludes that Section 106 primary healthcare contributions would make this a negligible impact. The applicants planning obligations statement suggest that the matter of provision of healthcare facilities continue to be explored and await the outcome of the financial viability.

387. NHS Norfolk and Waveney Strategic Estates have requested a developer contribution to fund improvements to capacity and mitigate the impacts of the development. However, any additional contributions for the funding of facilities secured through planning obligations will need to take account of development viability; be necessary to make the development acceptable in planning terms; be directly related to the development; and be fairly and reasonably related in scale and kind to the development. Potential contributions to the provision of healthcare would need to be balanced against requirements for other essential infrastructure and community benefits, including provision of affordable housing.

388. NHS Norfolk and Waveney Strategic Estates do however also welcome further discussions regarding the inclusion of land for a health facility sufficient to serve the East Norwich development as a whole. No such discussions have taken place.

389. There is currently no provision within the application for improvements to health care infrastructure in the form of provision of land for a health facility sufficient to serve the East Norwich development as a whole. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01. The application is also contrary to policy DM1 which require provision to be made for improved health and well-being opportunities and NPPF paragraph 97 which requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.

Open space, sport and recreation

390. The ES baseline assessment identifies that there are 3 indoor sports facilities within 1 mile of the site at Riverside Leisure Centre (25 metre swimming pool; gym, fitness classes, sauna and steam room); Wensum Sports Centre (sports hall, gym and studios – facing closure) and at the Hewett Academy (pool, gym, dance studio).

391. There are outdoor sports facilities in locations up to 1.3 miles from the site covering a variety of sports including; Carrow Park (3G football pitch) and Goals Norwich (football and hockey), Lakenham Recreation Ground (Tennis and Bowls), Grace Park (cricket and 5-a-side football), Norfolk Snowsports Club (facilities for skiing, snowboarding and tubing).

392. There are several play spaces and larger outdoor green spaces at Sunny Hill open space, Argyle Street Children's Playground, Grace Park, Netherwood Green Childrens Playground, Jubilee Park (play areas, basket ball courts and football pitches), Holls Lane and Trowse Woods. Whitlingham Country Park is also within 1.5 miles and offers space for walking, running and water based activities.

393. Three new public spaces are proposed as part of the full and outline parts of the application at Colman's Wharf and surrounding the retained mustard seed building (public squares) and chimney park (small park with water feature), together with use of parts of the Abbey grounds as public open space (including play) and other areas of green infrastructure. The application also references, wetland planting, rain gardens and swales and community gardens, although much of this is contained in the outline part of the application.

394. While there may be sufficient gym, sports and formal recreation services within the local area, the provision of open space and facilities for sport and recreation are also an integral part of green infrastructure and open space required for general informal recreation, discussed in more detail as main issue 10.

Community facilities

395. The ES baseline and Health Impact Assessment (HIA) identifies that the estimated increase in population will give rise to some additional demand for existing community facilities such as libraries, places of worship and community halls.

396. The nearest existing community facilities are Jubilee Community Centre (800m) and Old Lakenham Community Centre (1.1 miles). There are no

existing youth facilities within 5 miles of the site. Allotments are located at Lakenham and Lakenham Baths, but there is no availability and as with all allotments in Norwich there is a waiting list.

397. There are facilities for local community use within relative close proximity to the site. However, on examination it is observed that many of these facilities are in Lakenham or are located towards the city centre or on the opposite side of the river, where access using active travel measures currently requires travelling along or crossing very busy sections of road.

398. The HIA suggest that the proposed development could bring an additional

- 1,291 library service users,
- Youth centres would need to accommodate approximately 222 new participants,
- An additional 134 residents are likely to need access to adult learning and skills services,
- Additional community centre space may be required as part of the overall masterplan.

399. The ES proposes to mitigate the impacts of the proposed development through provision of Section 106 contributions towards social infrastructure with a particular focus on community learning and skills, enhancing libraries provision and youth services. Some of these requirements would be funded through CIL. Additional community space could come forward if demand emerges within existing and proposed buildings as part of the flexible uses proposed, although such requirements and provisions would likely come at a reserved matters stage.

Main Issue 9. Amenity

400. Key policies and NPPF sections – GNLP2, GNLP7.1, GNLPSTR.01, DM2, DM3, DM11, DM12, DM13, NPPF paragraph 135 and section 15.

401. Policy DM2 relates to a number of amenity considerations encompassing the impact of development proposals on those living or working adjacent to development sites as well as the level of amenity new occupiers will experience.

402. The proposed height, massing and density of the development raises a number of amenity considerations relating to overshadowing and internal light levels associated with:

(a) Extent of overshadowing resulting from the development and the impact on the living and working conditions of existing neighbouring residential properties.

(b) Future internal light levels and outlook for future occupiers of the residential flats.

(c) Future external sunlight levels to external amenity areas, including private, shared communal and public areas.

Impacts on existing residents

403. On the north side of the River Wensum are a series of residential apartments blocks located on Geoffrey Watling Way. Blocks range between 6 and 10 storeys in height, with many properties having a southerly aspect. The application is accompanied by a Daylight and Sunlight Report which focuses on the illustrative massing of the proposed development (rather than the parameter massing) as a more realistic future development scenario for the largely outline parts of the application, but does provide some commentary also on parameter massing impacts.
404. The reports technical analysis shows that a high percentage of windows and rooms within the existing development to the north of the river would meet or exceed the default BRE Report guidelines. Where deviation from the guidance occurs, it is predominantly to windows and rooms that are set beneath projecting balconies which, by their inherent design, restrict the amount of light that can be received to the room beneath. Consequently, even a small additional obstruction can lead to a large percentage reduction beyond the default guidance whereas the absolute reduction in light is often modest. The applicant's consultants explain that this does not necessarily mean that the effects are unacceptable, and consideration needs to be given to the local context as the retained levels of daylight and sunlight may be commensurate with the amounts of daylight and sunlight received by other neighbouring buildings in the current conditions.
405. What is clear is that further detail is required, focusing on those areas where light levels will be affected and also extending considerations to impacts on user experience of the existing south facing public riverside path. As the outline application is seeking approval for development associated with a set of parameter plans it is the maximum heights as set out in those parameter plans that should be used as the test for assessing light levels against.

Impacts on proposed residents

406. It is extremely difficult with an outline development to gain significant value from the findings of a report which relates to theoretical/illustrative massing for parts of the development where none of the detail is fixed. However, the headline findings of the report highlight as expected that daylight will be more restricted to units within buildings which face into central courtyards and on lower storeys of taller buildings.
407. Approximately one third of the facades of buildings modelled would receive less than the recommended 1.5 hours of sunlight on 21 March. Over 30% to 40% of each façade will struggle to meet the BRE Report guidelines for sunlight amenity. The areas not meeting the guidelines are mostly orientated in a northerly direction and care will be needed at detailed design stage to ensure that access to sunlight is maximised.
408. Winter sunlight would be restricted to some of the podium level courtyards/amenity spaces central to the apartment blocks and open space/landscaping areas between some of buildings towards the northeast, suggesting that further consideration would need to be given to the layout at detailed design stage to ensure that these public and private amenity spaces receive adequate light levels to be of value.
409. The Health Impact Assessment suggests that a layout has been considered taking into account natural light to dwellings and a scheme can be achieved

where none of the dwellings will be single aspect and north facing, and 58% of units will be dual aspect. However, as a large area of the site is being considered in outline a level of detail does not exist to fully determine whether this can be the case and such detailed considerations would need to take place at reserved matters stage but given the scale of the buildings proposed and their orientation it is considered that this may be difficult to achieve.

410. What this does highlight is that at detailed design stage further assessment will be required and layout of the buildings themselves and rooms within the accommodation will need careful consideration to ensure that a sufficient amount of accommodation has access to adequate light levels. There is no consideration within the report of the impact of the development on light levels to the riverside path. Given that it is located to the north of tall buildings, an assessment of light reaching this important piece of public site movement infrastructure as required by policy GNLPSTR.01 will be necessary.
411. For an application of this scale with such large areas in outline and no fixed layout, but with significant heights proposed and quite significant changes between height parameter areas, it is extremely difficult to determine with certainty amenity impacts associated with access to light. The detailed internal layout and external appearance of development blocks would be subject to further reserved matters applications and detailed daylight and sunlight analysis would be required at that time to verify internal lighting conditions for individual residential units.
412. However, notwithstanding this, the outline application seeks consent for parameters which include height and land use together with quantum of development and a supporting Design Code which seeks to establish some street and spaces design and built form principles and therefore it is necessary to assess whether the outline parameters and Design Code could allow for a form of development in which future residents will experience satisfactory living conditions.
413. As discussed previously at least some of the content of the Design Code cannot be agreed and changes to the proposed site code could have wider consequential impacts. More detail is required in the code around massing and transitional areas and how areas of differing heights can ensure living and amenity spaces have adequate access to light.
414. The application therefore currently does not provide sufficient information to allow the impact of height and associated impacts on daylight and sunlight on residential amenity of existing and future occupiers of the development to be determined. In the absence of this information, it must be concluded that the application is contrary to Policies DM2, DM3, DM12 and DM13 of the Development Management Policies Local Plan 2014; and paragraph 135(f) of the National Planning Policy Framework (2023).

Noise and vibration

415. Policy DM2 seeks to ensure that future occupiers of developments will have adequate protection from noise and to protect the amenities of existing occupants in the vicinity of the site from unacceptable noise disturbance. While policy GNLP2 similarly requires development to avoid risks of unacceptable noise pollution.

416. An assessment of noise has been undertaken in relation to the proposed development and this has informed the Noise and Vibration section (Chapter 9) of the Environmental Statement. The assessment considers the potential impact of noise (both daytime and night-time) from the primary source of road traffic noise and occasional rail movements on the Great Eastern Main Line on residents and what mitigation may be required for recognised UK standards/guidance to be met. On-site vibration levels were qualitatively assessed during the noise survey and no vibration was observed to be perceptible.
417. The report comments that ambient noise levels at the southeast of the site are influenced by the Tarmac Trowse Asphalt Plant located approx. 50 metres from the site boundary, but goes no further on this matter. Policy GNLP7.1 requires development to address local issues including the active railway, the protected minerals railhead and noise. While policy GNLPSTR.01 goes further to state that 'proposals for development must ensure that they will not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility'.
418. The Trowse railhead and asphalt plant is also safeguarded as part of the adopted Norfolk Minerals and Waste Core Strategy (policy CS16). Two separate operations take place on this site. Tarmac operates an asphalt plant which is regulated by environmental permit and controlled by conditions of relevant planning permissions relating to amongst other things noise, operating hours and control of dust. A planning application to renew/modernise the plant was granted by Norfolk County Council in December 2023. The Tarmac plant is understood to operate at varied intensity depending on demand and therefore an understanding of the periods of peak demand to assess the worst case scenario of noise generation at the site based on the most recent planning approval for the site will be required. Separate from this is use of the site as a railhead, which involves the transfer to site of aggregates by train. Railhead operations have deemed consent, with no restriction on operating hours or conditions limiting noise and therefore are able to operate 24 hours a day, depending on rail network capacity.
419. Representations from the councils environmental protection officer, Norfolk County Councils Minerals and Waste section and Tarmac and Network Rail themselves have raised concerns that the noise from the full extent of potential railhead operations has not been considered. Further investigations and assessment of the noise impacts of the railhead operations at the Tarmac and Network Rail sites with regards to their activities is essential to fully understand the operation of the rail head and the potential impact the noise will have on the proposed development. Explanation should be provided as to how any existing noise impacts on users and residents of the proposed development will be mitigated through the design, layout and construction of the development. In addition a BS4142 assessment is required to ascertain noise levels that affect the outdoor amenity of the proposed development
420. The report also does not make reference to the Acoustics Ventilation Overheating: Residential Design Guide in relation to the mitigation measures to provide noise attenuation. In addition a level 2 AVO assessment is required with recommendations on the attenuation to protect the residents.
421. The noise and vibration impact from demolition and construction on existing residents as part of the applicant's demolition and construction plans has been

considered and can be mitigated through implementation of best practice means of control which can be secured by planning conditions. In addition the noise impacts of changes in road traffic noise as a result of the development, using traffic flow data from the Transport Assessment have been assessed. The change in road traffic noise levels have been calculated to result in negligible short and long term impacts on residents adjacent to the road network.

422. The application as submitted however has not appropriately considered the potential for noise from the existing Trowse mineral railhead to impact on the amenity of residents of the proposed development. Excessive noise impacts could result in complaints that prejudice the continued operation of the safeguarded rail head.

423. Therefore, the application does not provide sufficient information to fully assess the impact of noise on residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; criterion (f) of paragraph 135 and paragraph 191 and 216(e) of the National Planning Policy Framework (2023).

Air Quality

424. Policy DM2 seeks to ensure that future occupiers of developments will have adequate protection from pollution and to protect the amenities of existing occupants in the vicinity of the site from unacceptable air pollution. While policy GNLP2 requires development to avoid risks of unacceptable air pollution.

425. The proposed development site lies just outside of the Air Quality Management Area (AQMA) for NO₂ declared by Norwich City Council in 2012. Policy DM11 requires development which is likely to have an impact on air quality to take particular account of the air quality action plan for that area.

426. This application proposes a significant quantum of development adjacent the AQMA and for this reason, air quality as a potential significant environmental impact is a matter considered within the ES (Chapter 8). The air quality chapter in the ES is informed by an Air Quality Assessment which assesses both construction and operational effects associated with the development.

427. The council's environmental protection officer has commented that due to the scale of the development there is the potential for significant adverse effects to arise from the development in regard to air quality. At present there are concerns regarding various element of the air quality report and therefore it is currently concluded that there is insufficient information to allow a decision to be made regarding the air quality impacts associated with the development. The scope of the report needs expanding to consider a wider range of pollution sources, cumulative impacts, updated published guidance, amended targets and further odour assessments in relation to the Trowse Asphalt Plant.

428. Therefore, the application does not provide sufficient information to fully assess the air quality impacts on the residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; paragraph 192 of the National Planning Policy Framework (2023).

Main Issue 10. Green infrastructure, open space and landscaping

429. Key policies and NPPF sections – GNLP1, GNLP2, GNLP3, GNLPSTR.01, DM3, DM6, DM7, DM8, NPPF section 8, 12 and 15.

430. Green infrastructure (GI), amenity space, open space and landscaping are very much interrelated and subject to a number of adopted development plan policies. Green infrastructure includes a network of multi-functional greenspace which delivers benefits to both the environment and the local community. Green infrastructure can include natural green spaces and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space. These spaces may include allotments, urban parks and designed historic landscapes as well as their many interconnections such as footpaths, cycleways, green corridors, and waterways.

431. Policy DM6 requires development to take all reasonable opportunities to avoid harm to and protect and enhance the natural environment of Norwich and its setting, recognising the need to avoid harm to the adjoining Broads Authority area. Policy DM3 identifies Trowse Swing Bridge as a main gateway to the city which requires a design which respects the location and context of the gateway. Therefore, the site acts as a gateway into the city but also represents a linkage to the countryside and the Broads.

432. Recognising the contribution that GI and site landscaping in general can make to achieving sustainable communities, policy GNLP2 requires development to create and contribute to multi-functional green infrastructure links on or off-site through landscaping, street trees and other tree planting. Policy GNLP3 requires enhancement of the natural environment, requiring development to respect the importance of the nationally designated Broads Authority area and its setting.

433. The site has a significant river frontage to the River Wensum which connects and runs through the adjacent Broads Authority area. Therefore, although it is appreciated that this is a key regeneration site for the city there still needs to be recognition of the relationship of the site with the Broads Authority area in close proximity and the need for provision of green infrastructure and landscaping connections through and from the site into the rural areas beyond the site.

434. Policies DM3 and DM8 both require development to include open space (including landscaping and green infrastructure) for the purposes of improving the appearance and character of the development and the surroundings;

enhancing biodiversity and ensuring new residents have access to local recreational and play opportunities. The NPPF states that planning decisions should plan positively for the provision of shared and open spaces acknowledging the importance of such spaces to the health and wellbeing of communities.

435. Policy DM8 requires informal, publicly accessible recreational open space on-site including for this scale of development, on-site provision of younger children's play space which is at least 150 sq. metres in size with a minimum of four different pieces of equipment. The play spaces would need to adhere to guidelines as set out in the council's Open Space and Play SPD (adopted October 2015) and to the recommendations of Sport England and Fields In Trust.
436. The planning application documents include a set of detailed landscaping plans just for the areas immediately adjacent to the main access routes, public realm and the Abbey grounds which are part of the full planning application. A public open space parameter plan and Design Code form part of the outline submission. The Design Code sets out the wider site spatial hierarchy of spaces and streets setting out what it considers are key landscape spaces including parks and squares and linkages between: creation of public spaces (including squares, new connections and existing street frontages); provision of children's play opportunities; and community growing spaces. The result is, detail in isolation supplemented by a much higher level open space plan and landscaping strategy, providing a patchy, incomplete picture of important linkages and aspects of key public realm such as the riverside path and other green and blue linkages.
437. Policy GNLPSTR.01 requires development across the ENSRA to achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and the locally registered historic park and garden at Carrow Abbey, along with appropriate improved public access.
438. The overall landscape strategy itself lacks a coherent design approach which protects existing features and works them into a usable public landscape framework including a strong access strategy. The site contains significant natural assets including the Abbey grounds and its interesting specimen trees together with areas of woodland, but seeks to deal with the use and functioning of these areas solely via the Design Code rather than utilising a site wide landscape strategy. As discussed in previous sections there are inconsistencies between the Design Code and content of the parameters plans in places, especially around access and movement and this impacts on use of public and private space and connections between.
439. In total the submission states that 4.7 hectares of open space is proposed across the development. Of this total, there will be 0.8 hectares of parks and gardens, 2.62 hectares natural and semi-natural greenspace, 1.15 hectares of amenity greenspace, 0.05 hectares of provision for children and young people and 0.13 hectares of green corridor.
440. Play provision is proposed to take the form of a single equipped area for play (LEAP), several smaller local areas for play (LAP's) and a variety of informal play spaces to be located within the various character areas on site. The informal play spaces are intended to be located within amenity green space to offer doorstep play experiences.

441. The Abbey and its immediate grounds area of open space is central to the development and the most significant area of green space on the site. The strategy for this space is however unclear, the approach seems to be that this is a special area which would remain largely in isolation. However, the development would introduce a significant population of new residents to the surrounding area who would want to access this space as their nearest amenity. In the interests of accessibility and permeability, public access to this area of green space is essential, however it is located at an elevated level compared to much of the proposed new housing. There is no real understanding of how heritage issues associated with protection of the ancient monument while allowing public access or working with the level differences between the garden plateau and the rest of the site will be approached.
442. As discussed earlier under main issue 4, there is an identified deficiency in the amount of green infrastructure provision on site and as a result there is therefore likely to be a lack of the range of functions required to meet the recreational needs of the proposed residents (including dog walking).
443. Taken together the application does not provide sufficient levels of information to fully assess the green infrastructure, open space and landscaping provisions of the development. In the absence of this information, it must be concluded that the application is contrary to policies GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; DM3, DM6, DM7 and DM8 of the Development Management Policies Local Plan 2014; and paragraph 88, 97, 102 and 135 of the National Planning Policy Framework (2023).

Main Issue 11. Trees

444. Key policies and NPPF paragraphs – GNLP 2, GNLP3, GNLPSTR.01, DM7, NPPF paragraph 136.
445. Policy DM7 requires trees and significant hedge and shrub masses to be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or there are exceptional and overriding benefits in accepting their loss.
446. Policy GNLP 2, GNLP3 and STR.01 recognise the contribution that trees make to creating multi-functional green infrastructure, with enhanced natural assets and the protection and enhancement of trees forming an integral part of development design. The NPPF at paragraph 136 goes a step further to acknowledge the contribution that trees can make to helping urban environments mitigate and adapt to climate change.
447. In addition to the protection afforded to many of the trees on the site by the conservation area designation a number individual and groups of trees in the area around the Abbey and its grounds are subject to a tree preservation order.
448. The proposals include the removal of 1 Category B tree group, 7 Category C trees, 1 Category C tree group and 2 Category U trees.
449. The table below sets this out in more detail;

Category	Quantity	Tree Ref. and Reason for Removal
A	0	N/A
B	1 tree group	G63. Direct conflict with proposed new building and road section.
C	7 individual trees and 1 group	T33 and T66. Direct conflict with proposed new woodland footpath sections. T57, T58 and T59. Direct conflict with proposed pavement. T60. Direct conflict with proposed new road section. G61. Direct conflict with proposed new building and road section. T62. Substantial partial conflict with proposed building.
U	2	T2 and T13 both proposed to be removed given their poor and deteriorating condition, along with the intention to run new footpaths close to them.
Total	9 individual trees and 2 tree groups	

450. The council's arboricultural officer objects to the removal of tree groups G61 and G63 and tree T60 (more appropriately categorised category B). The trees are located to the southeast of the Abbey in the area adjacent to the flint boundary wall that separates the formal gardens from the current car parking area. The applicant's own tree report identifies group G61 and G63 as a 'well structured mixed species woodland group' forming an important visual site demarcation, screening and landscape feature'. Due to these being visually significant groups of trees which also provide a valuable woodland habitat on site, together with a single tree worthy of retention in this prominent location on the southern approach to the Abbey, their loss has not been justified, particularly as their loss does not allow for a substantially improved overall approach to the design and landscaping of the proposed development that would outweigh the loss of the trees.

451. The application proposes the loss of visually significant protected trees that has not been justified as it would not result in a substantially improved overall approach to the design and landscaping of the development. The development is contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM7 of the Development Management Policies Local Plan 2014; and paragraph 136 of the National Planning Policy Framework (2023).

Main Issue 12. Biodiversity

452. Key policies and NPPF sections – GNLP3, GNLP7.1, GNLPSTR.01, DM3, DM6, NPPF section 15.

453. Policy DM3 and DM6 requires provision within developments of new and enhanced green infrastructure which create a biodiversity rich environment and encourages the delivery of significant benefits or enhancements to local biodiversity.

454. Policy GNLP3 requires development to deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to local green

infrastructure strategies. It goes further than adopted development plan policy to require demonstration that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation.

455. The governments Planning Practice Guidance (Paragraph: 020 Reference ID: 74-020-20240214) has clarified however that 'decision makers should not give weight to local policy which requires biodiversity gains for types of development which would now be exempt under the statutory framework'. As a submission made before 12 February 2024 when statutory biodiversity net gain for major developments came into force, 10% statutory net gain does not apply. Therefore, the test remains of the lesser NPPF paragraph 180(d) requirement of 'providing net gains for biodiversity' should be applied.
456. Policy GNLP7.1 and GNLPSTR.01 requires development of the ENSRA and Carrow Works site to protect and enhance biodiversity.
457. A Preliminary Ecological Appraisal (PEA) has been submitted by the applicant in support of the application. High level findings include;
- Confirmed bat roost in the abbey and previously confirmed roost in the Stables;
 - High potential for roosting bats in two buildings;
 - Moderate potential for roosting bats in three buildings;
 - Low potential for roosting bats in four buildings and two structures;
 - Hibernation potential in the basements/ground floor of five buildings on site;
 - Potential for bat roosts within trees on the site;
 - Moderate to high potential for commuting and foraging bats associated with woodland on site and off site the River Wensum (north) and railway line (east);
 - Moderate potential for Schedule 1 birds in particular peregrine falcon associated with taller buildings on site;
 - High potential for nesting birds in tree and woodland on site;
 - Moderate potential for reptiles on site;
 - Moderate potential for polecat on site (with previous record);
 - High potential for hedgehog on site.
458. The findings and recommendations of the report include the need for further surveys including:
- Bat activity surveys to inform an approach to mitigation.
 - Bat hibernation and emergence/re-entry surveys.
 - Bat preliminary roost assessments of trees potentially affected by proposals.

- Reptile survey to confirm presence/absence and identify approach to mitigation.
- Water Vole and Otter surveys may be needed to identify mitigation and compensation for indirect impacts.
- Surveys for Peregrine falcons and Black redstart/other schedule species.
- Survey to establish presence/absence of Polecats.
- Also a significant number of existing buildings are proposed for demolition. Bat surveys and assessment of suitability for bats will be needed for all of these structures.

459. These outstanding protected species surveys need to be undertaken to inform more detailed ecological assessment and the results submitted to enable assessment of the biodiversity impacts and any proposed mitigation prior to the applications determination. No further survey information has been made available since the initial submission of the application.

460. The PEA lists biodiversity enhancement measures to be 'considered' to provide net gains in biodiversity that paragraph 180(d) of the NPPF requires. It suggests that an aspirational minimum of 10% net gain in biodiversity should be evidenced through a Biodiversity Impact Assessment using the then Natural England Biodiversity metric (now Statutory Biodiversity metric). The application was made at a time when statutory biodiversity net gain was not in place and therefore it is not a specific requirement that the DEFRA statutory metric tool is used or 10% net gain demonstrated through the provisions of the Environment Act 2021. However, the NPPF requirement to provide 'net gains' (unquantified) is applicable.

461. The PEA itself concludes 'In the absence of species-specific survey data and a final nutrient neutrality mitigation strategy, some assumptions have been made, however assessments of importance and impacts can be reasonably predicted through assessment of on-site habitats and existing biological records data. However final valuations and impact predictions cannot be made until the surveys are complete, at which point this report should be revised, updated and amended where necessary, to ensure that neutral or positive residual effects remain'. The assumptions made by the applicant's consultants are of a high number and there is evidence of significant omissions in survey information such that it is not possible to fully assess biodiversity impacts on species or habitats or determine any mitigation required to achieve a net gain in biodiversity.

462. The application does not provide sufficient information to fully assess the biodiversity impacts of the development and determine whether significant harm will result from the development taking place. It is not possible to determine whether mitigation measures are required to protect and secure an enhancement of biodiversity such that a net gain in biodiversity is achieved. In the absence of this information, it must be concluded that the application is contrary to policies GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policies DM3 and DM6 of the Development Management Policies Local Plan 2014; and paragraph 180(d), 185 and 186 of the National Planning Policy Framework (2023).

Main Issue 13. Flood risk

463. Key policies and NPPF sections – GNLP2, GNLP7.1, GNLPSTR.01, DM3, DM5, NPPF section 14.
464. The NPPF and Local Plan policy DM5 seek to direct new residential development to sites at the lowest risk of flooding. In accordance with policy the scheme should be assessed and determined having regard to the need to manage and mitigate against flood risk. Policy DM3 and DM5 also requires the incorporation of mitigation measures through the promotion of sustainable drainage to deal with surface water arising from development proposals to minimise and where possible reduce the risk of flooding on the site and minimise risk within the surrounding area.
465. Policy GNLP2 and GNLP7.1 require local flood risk issues to be addressed, together with the incorporation of sustainable drainage systems and flood risk should not be increased elsewhere. Similarly, it is a requirement of the NPPF that development does not increase flood risk elsewhere and also that major developments incorporate sustainable drainage systems.
466. The Environment Agency (EA) flood mapping shows that the majority of the site is not at risk of fluvial and tidal flooding (Flood Zone 1). However, an area in the northeastern corner of the site is located within flood zones 2 and 3 at medium and high flood risk. The site also has a medium risk of surface water flood risk, with areas between buildings at the north of the site and in the northeast corner of the site at most risk. There is also potential for groundwater flooding to occur at the site, again the north of the site in the area along the river is most impacted.
467. A site-specific flood risk assessment (FRA) has been provided in support of the application. The applicant's consultants have amended the EA 2017 modelling and carried out further flood modelling with revised flood levels and flood outlines, but have not submitted the detailed modelling for review by the EA. The EA also advise that the Sequential Approach to the location of development on the site has not been followed and it has not been confirmed whether land raising and development is proposed within Flood Zone 3b (the functional floodplain, where water has to flow or be stored in times of flood).
468. The FRA fails to show that the proposed development will not result in a net loss in floodplain storage. As a result, the proposed development would reduce flood storage capacity, thereby increasing the risk of flooding elsewhere. The submitted FRA has failed to demonstrate that adequate flood storage compensation can be provided on site as it has proposed providing compensatory flood storage within an adjacent site which is subject to a separate planning application and not within the applicant's control.
469. The applicants survey information demonstrates that the northern area of the site discharges surface water to the River Wensum (via 3 outfalls), whereas the southern area (including the Abbey) discharges to the ground via infiltration soakaways. The existing drainage arrangements are proposed to be retained in situ and re-used as part of the proposed development, however no condition surveys have been carried out to confirm their viability nor assessment of infiltration rates has taken place.
470. There is also a lack of consideration of the attenuation capacity that the current surface pooling of runoff provides or the connectivity of the site to the

Deal Ground to the east via surface water and river flooding passing through the underpass beneath the railway and between the two sites.

471. As a site allocation within a new Local Plan, the 'sequential test' to allocation of development has already been carried out and passed through the sites selection for inclusion within the plan. Many of the numerous issues and concerns raised by both the Environment Agency and the Lead Local Flood Authority may be possible to resolve with engagement of the applicant and their project team to provide the outstanding information and clarity required. The requirements of policy STR.01 to incorporate appropriate mitigation measures to address flood risk from both river and surface water flooding have however not currently been met.
472. To date engagement by the applicant has been absent and therefore there remains insufficient information contained within the initial submission to demonstrate satisfactory management of flood risk from all sources and to ensure that the sustainable drainage systems proposed will operate as designed for the lifetime of the development to prevent flooding in accordance with National Planning Policy Framework (2023) paragraph 173 and 175, policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan and policy DM3 and DM5 of the Development Management Policies Local Plan 2014.

Main Issue 14. Development viability

473. Key policies and NPPF sections – GNLP5, GNLP7.1, STR.01, DM33, NPPF section 5.
474. As set out early within this report GNLP policy GNLPSTR.01, sets out ENSRA site wide, followed by Carrow Works site specific requirements and includes a list of key social, economic and other infrastructure requirements that would be expected to be delivered, which may need to be subject to viability testing through individual planning applications.
475. On the specific matter of affordable housing provision, the NPPF emphasis is for local plans to identify the amount of affordable homes required locally. Policy GNLP5 requires major residential development proposals to provide at least 33% affordable housing (this site is not located in Norwich City Centre), or for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision stage. NPPF paragraph 66 suggests that decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.
476. Policy GNLP5 allows for the viable level of affordable housing to be determined at planning application stage having regard to specific site circumstances and evidence of exceptional costs.
477. This is a brownfield site and the applicant has submitted a Financial Viability Report. The applicant's Financial Viability Report has not been subject to an independent review at this stage. It was acknowledged by the applicant themselves, and has since proven to be the case through initial assessment of the submission, that changes to the development proposals from that initially submitted will be required. The local planning authority is of the opinion that those required changes are likely to be substantial, however the applicant has not engaged in discussions and the full extent of any changes have not been

determined. Therefore, until the proposals have been through a process of negotiation and revision and to prevent unnecessary expense, the comments on viability have initially been provided by officers of the council.

478. A headline summary of the appraisal is as follows;

- Benchmark Land Value = £34.68 million (existing use value plus premium).
- Gross Development Value = £552,351,160 (both residential and commercial elements).
- Gross Development Costs = £463,156,996
- Residual Land Value = negative £31.49 million
- Overall viability gap of £66.17 million
- Developer profit = £106,484,937 (12.6%)

479. The viability report makes some allowance for CIL, GIRAMS and nutrient neutrality (wrongly referred to as 'Nitrogen Neutrality'), but does not constitute an offer to pay these amounts and does not consider how vacant building credit could potentially reduce affordable housing requirements at the site.

480. The report makes no provisions for additional key infrastructure costs associated with the requirements set out in policy GNLPSTR.01 such as bridge or underpass links or allowances associated with provision of land for a school or health facility. The conclusion of the report is that due to the residual site value after allowing gross development costs being less than the benchmark land value the development cannot support any additional contributions. The viability appraisal also makes no provision for an affordable housing contribution of any type i.e, neither on site nor in the form of a commuted sum, as to do so according to the information provided by the applicant would not be viable.

481. The applicant's viability appraisal is very high level and although the council's own high level assessment of this information has raised some initial queries, it has not been possible to pursue this further due to the lack of engagement of the applicant.

482. Of note is that after adding in the benchmark land value the development would appear to deliver a profit well below industry standard levels which could raise financing issues and would therefore raise concern around actual deliverability of the scheme.

483. There would clearly be a need to more thoroughly test the viability information through independent review at some point, including an independent review of the sites existing use value which appears high. However, at this initial stage it is also highly likely that public funding/subsidy will be necessary to deliver development on this site which meets the requirements of the GNLP policies: no discussions on this have taken place to date.

484. It was envisaged several years ago that development at East Norwich represents a transformative opportunity for regeneration of the area and the

East Norwich Partnership sought to bring forward comprehensive and coordinated regeneration of the East Norwich area.

485. The development proposed at Carrow Works as part of this planning application however represents a single isolated development which lacks the facilities and necessary connectivity to deliver sustainable accessibility. It has not been comprehensively undertaken so as to connect and contribute in a wider sense, along with other sites, to the delivery of sustainable development at East Norwich. Delivery in isolation without facilitating the connectivity within and between sites in the strategic regeneration area or providing co-ordinated delivery of new social and economic infrastructure could be prejudicial to future development of or restrict options for other sites that form part of the ENSRA.

486. As it stands the application is not acceptable for a number of policy reasons aside from the obvious ones relating to lack of provision of key infrastructure required to deliver a highly sustainable development required to contribute towards the high quality sustainable residential led mixed use community of East Norwich.

Other matters

Contamination

487. Key policies and NPPF section – GNLP2, GNLP7.1, GNLPSTR.01, DM11, NPPF section 5.

488. A Phase I Desk Study and Phase 2 Site Investigation Report have been submitted to support the application. The outcomes of these reports are that a full investigation was not possible whilst there were structures on the site and there were areas that could not be accessed. Following the additional investigations, remediation strategies to mitigate risks to the proposed development from identified contamination may need to be prepared.

489. As there is not a full account of the contamination on site the environmental protection officer has asked that a full contaminated land condition be used to ensure that the pollutants and contamination pathways have been fully considered to enable the site to effectively be remediated

490. The Environment Agency also suggest that conditions could be used to secure further outstanding detail. Together this requires conditions relating to contamination investigation/suitable remediation and verification; controls over infiltration SUDs; piling; controls over soil importation and a reminder that an asbestos survey should inform building refurbishments.

Energy and water efficiency

491. Key policies and NPPF paragraphs – GNLP2, DM1, NPPF section 14.

492. The proposal triggers both energy and water elements of policy GNLP2. An Energy and a Construction Statement accompanies the application and proposes separate strategies for the refurbished buildings which form part of the detailed application and for the refurbished and new build dwellings and commercial units included in the outline.

493. A combination of use of a fabric first approach utilising passive design measures, well insulated and airtight building fabric (Future Homes Standard as a minimum) and a site wide approach utilising measures such as PV, solar thermal and heat pumps will be used.

494. Measures are also highlighted that would limit water consumption on a domestic and commercial scale. Suitably worded conditions could be used to secure the specified energy requirements and water efficiency measures as required by GNLP2.

Equalities and diversity issues

495. Part of the submission include reference to features of the development which could be considered to promote equality and diversity. In summary these include:

- 20% of new homes to comply to meet 2015 Building Regulations M4(2) for accessible and adaptable dwellings.
- Improved access to new employment opportunities.
- Parking provision to include provision for disabled drivers in accordance with policy standards.

S106 Obligations

496. GIRAMS contribution of £391,952 (£210.84 per residential unit) is identified in the Financial Viability Report.

497. Nutrient neutrality – indicative costs between £2,500 and £5,500 per dwelling.

Local finance considerations

498. 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. 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.

499. The scheme proposed represents investment in the City which will take place over a prolonged period. As such it could have considerable financial benefits in terms of direct and indirect employment during the construction period and a likely further increase in employment levels in the commercial space created and that arising from the spend of future residents. These impacts were considered in main issue 8 of the report and are clearly material considerations in reaching a planning decision.

500. However, the scheme will give rise to other local finance considerations such as:

- a) A considerable increase in Council Tax revenues compared to the current situation. This would only be material to the planning decision if it were considered to help make the development acceptable in planning terms. Whilst the income raised may be significant the development will also create commensurate demands on Council services and in the absence of any evidence that any increase in Council Tax revenues will be directed into the area this impact is not considered material to the planning decision.
- b) A changed level of business rates income which could represent an increase on the current situation when the development is complete. In the absence of any evidence that any increase in business rates will be directed into the area this impact is not considered material to the planning decision.
- c) New Homes Bonus. At present the future of New Homes Bonus is uncertain so it is not known whether development of Carrow Works would result in financial benefit to the Council. In this situation this is not considered material to the planning decision.
- d) Community Infrastructure Levy. The development may give rise to Community Infrastructure Levy. The rates that it may give rise to are uncertain given that Levy rates may change over the duration of the scheme but at current rates the potential CIL liability of the proposed scheme is estimated at £7.78m (as calculated by the applicant). If generated 5% of this would be taken to cover administrative costs, 15% would go into the neighbourhood fund and be used at the City Council's discretion and the remaining 80% would be pooled into the Infrastructure Investment Fund which is reallocated by the Greater Norwich Growth Board to infrastructure projects based on their strategic need.

Human Rights Act 1998

501. Officers have considered the implications of the Human Rights Act 1998 in reaching a recommendation to refuse this application. They consider that the interference with the human rights of the applicant under Article 8/Article 1 of Protocol 1 is justifiable and proportionate for the protection of the rights and freedom of others or the control of his/her property in this way is in accordance with the general interest.

Section 17 of the Crime and Disorder Act 1998.

502. Officers have considered, with due regard, the likely effect of the proposal on the need to reduce crime and disorder as part of the determination of this application, in accordance with section 17 of the Crime and Disorder Act 1998. In reaching a recommendation to refuse planning permission, officers consider that the proposal will not undermine crime prevention or the promotion of community.

Planning Balance and Conclusion

503. A substantial number of statutory consultees have raised objections to the proposed development on a wide range of matters from impact on designated sites, heritage impacts, impact on highway safety and network resilience, lack of provision of necessary infrastructure, lack of housing that meets local needs including affordable housing, lack of green infrastructure, unjustified loss of

trees, flood risk, ecological impacts and impact on residential amenity. However, even in light of the critical comments received, the applicant has not made any changes to the submission or engaged to discuss technical matters.

504. It has been reported in paragraph 256 that this development required an appropriate assessment under the Habitats Regulations. In these circumstances the NPPF states in paragraph 188 that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a habitats site (either alone or in combination). In this case the appropriate assessment did not conclude that the proposal would have no adverse effect on the integrity of habitats sites.
505. As the presumption in favour of sustainable development does not apply, all policies in the current development plan should be considered to remain up to date for the purposes of paragraph 11 of the NPPF. In this context Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise, and this remains the starting point for the decision on this application. This includes the newly adopted Greater Norwich Local Plan.
506. The Carrow Works site presents a unique opportunity in the city to create a vibrant and truly distinctive new quarter for Norwich, built around, responding to and enhancing its rich collection of highly significant heritage assets centred around Carrow Abbey and Priory ruins. The sites size and the scale of development proposed would represent one of the largest development schemes proposed in the city and the development proposed here could bring back into use a largely vacant site, making a much more efficient use of the site than is currently the case and opening up large parts of the site to access by new residents together with the general public. The opportunity that redevelopment presents would appear very positive.
507. Regeneration of East Norwich would support Norwich City Council's Norwich 2040 City Vision, with its foundations built on creating a creative, fair, liveable, connected and dynamic city. There also exists a policy framework which is strongly supportive of the principle of mixed use redevelopment of this previously developed 'brownfield' site and includes an area and site specific policy relevant to redevelopment proposals on different parts of the ENSRA.
508. Indeed, the redevelopment proposals would bring economic benefits firstly in the form of employment during construction and longer term through employment opportunities that will be created through an as yet undefined mix and amount of commercial elements of this mixed-use development. The optimistic creation of over 1,000 jobs is clearly a beneficial aspect of the proposals and contributes to meeting the requirements of policy GNLP7.1 and GNLPSTR.01 and the employment opportunities around the creation of 4,100 jobs. However, employment provision can only attract moderate weight due to the reservations highlighted.
509. The proposed 1,859 dwellings will make a very substantial contribution to housing supply in the city. This residential-led scheme would directly support the housing delivery objectives of the GNLP and the NPPF in terms of significantly boosting the supply of homes. However, the lack of affordable housing provision and a proposed mix of housing types that is not consistent with identified local housing need would result in an unsustainable housing

development, which significantly reduces the weight that the provision of housing can be afforded to nothing greater than limited weight.

510. Even though the council and Greater Norwich authorities can demonstrate a five-year housing land supply, it is acknowledged that this site makes a significant contribution to housing delivery in future years. However, housing delivery even at significant levels as proposed here needs to be carefully weighed alongside the numerous harmful impacts that would result from the development that is currently proposed at the site and as discussed throughout this report.
511. There is an argument to be made that the proposals will bring the historic buildings on the site, including some of the highest significance, back into an active use, preventing deterioration and harm associated with longer term lack of use and neglect. However, this is not without harm being created itself as a result of the physical works required and the subdivisions created. Also, the wider proposals will introduce some public access to areas of the site that have until now been mainly private. However, again there are a whole range of other potentially less harmful uses which could achieve greater public access to the site and associated benefits that have not been explored. Therefore, any weight that can be afforded to the proposals bringing the site and buildings back into use is extremely limited due to the identified heritage harm.
512. Aside from the housing, the application as proposed fails to deliver much by way of public benefits or many of the other elements that together would contribute to achieving a highly sustainable mixed-use quarter at East Norwich. The development fails to deliver in a substantial number of ways the requirements of the site-specific policy GNLP7.1 and GNLPSTR.01 that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. In addition, many of the deficiencies in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result.
513. The development has failed to demonstrate an acceptable access strategy which provides access to the site by vehicles in a manner which does not impact on the safe and satisfactory functioning of the highway, together with much greater emphasis on provision of sustainable access for all. This requires adequate new or improved on and off-site facilities for pedestrians / cyclists / people with disabilities, to encourage walking and cycling/wheeling, together with improved public transport access, to maximise sustainable transport and to connect with and permeate through the site and link through existing and proposed new infrastructure with adjacent sites and local services.
514. There is no certainty within the submission as to delivery of any off-site infrastructure, including improvements to the existing highway network through modification of road infrastructure and junctions in the Martineau Lane, Bracondale and King Street areas to improve pedestrian and cycle access between the site, wider ENSRA and the city centre, facilities at Riverside Retail Park Large District Centre and Norwich Railway Station. There is also no firm commitment to the provision of bridge connections or railway underpass enhancements to connect the site to surrounding land/developments or other parts of the ENSRA.

515. The poor connectivity and limitations to sustainable accessibility and permeable movement to, from and throughout this development are quite significant failings of the application which will result in a development which is isolated from its neighbours and the rest of the city, limiting access to infrastructure, jobs and services for its new residents.
516. The situation of isolation from services is greatly exacerbated by the lack of provision of necessary social infrastructure on the site itself, including a serviced site to allow the delivery of a two form entry primary school required to meet the requirements of this development alongside other allocated large scale developments and provision of land to secure improvements to healthcare infrastructure sufficient to serve the whole of the ENSRA, as required by GNLP policy.
517. Another significant consideration particular to this site is that of heritage impacts. Although heritage consultees support the principle of regenerating the site, the current submission fails to respect the site's heritage by re-purposing the site's heritage assets and opening the site up to public use in a way which improves their setting and maintains an appreciation of their significance.
518. Paragraph 203 of the NPPF highlights the importance of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. The proposed residential use of Carrow Abbey as three dwellings has not been demonstrated to represent the optimum viable use for the Grade I listed building or the area of scheduled monument (Carrow Priory). As a result, the development in and around the Abbey, including new development in place of the dining hall, has been found to result in high levels of less than substantial harm to the significance and setting of these high order designated heritage assets associated with the necessary changes that are required to accommodate the proposed use, affecting the evidential, historic and communal values of the monument and Abbey, and their strong interconnection.
519. Paragraph 205 of the NPPF requires great weight to be given to a designated heritage asset's conservation, and the more important that asset, the greater the weight should be. Harm to, or loss of, the significance of a designated heritage asset of any level requires clear and convincing justification to satisfy the NPPF paragraph 206.
520. Aside from the development impacting on the immediate setting and significance of designated heritage assets in the historic core of the site, the proposals associated with wider areas of the site have also been found to result in high levels of less than substantial harm to the significance of designated heritage assets. Adaptation of and significant extension to non-designated heritage assets along the riverside in close proximity to designated heritage assets will not contribute positively to the conservation of many of the heritage assets or their setting, including the character and distinctiveness of the conservation area. Similarly, the impact of heights of some of the new build elements within the outline proposals and their specific arrangement in proximity to more sensitive heritage assets have significant potential to result in harm to varying degrees on setting and significance of various designated heritage assets. These levels of cumulative harm would need to together be weighed against the public benefits of the proposal.

521. In terms of heritage impact, officers have had regard to benefits of the scheme summarised in paragraphs 506-511 above, however these benefits need to be considered in the balance against high levels of less than substantial harm to the significance of a number of designated heritage assets that under paragraph 208 of the NPPF should be weighed against the public benefits. In making a planning judgement on this application given the overall identified level of harm to designated heritage assets across the site, great weight should be attached to avoidance of this harm. The NPPF highlights that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
522. Moving on to more general areas where information is absent, or detail is lacking such that it is not possible to fully consider and assess impacts of the development. Information concerning noise and air quality impacts is not sufficient and further detail around elements of height and layout to the extent that they impact on daylight and sunlight are required to assess residential amenity impacts of the development.
523. On a wider site scale, information relating to green infrastructure provisions, including open space provision, landscaping and biodiversity enhancements to provide a net biodiversity gain and information relating to flood risk and site drainage is not sufficient to fully assess whether provisions are adequate or impacts acceptable. Also, the proposed loss of visually significant protected trees has not been justified as it would be detrimental to the character and appearance of the Bracondale conservation area and would not result in a substantially improved overall approach to the design and landscaping of the development.
524. The application site is located in a river catchment where new development has the potential to cause adverse impacts on protected habitats. Measures to address the potential adverse effects of the development on the integrity of the Broads Special Area of Conservation (SAC) caused by increased nitrate and phosphate loading and a consequent degradation in water quality need to be incorporated into the development through the provision of mitigation measures or the purchase of credits. Without such provisions it has not been possible to conclude no adverse effects of the development proposal on the integrity of internationally designated wildlife sites (protected sites) in relation to degradation of water quality caused by increased nitrate and phosphate loading.
525. Measures to address the potential adverse effects of the development on the integrity of protected habitats sites caused by increased recreational pressure through provision of twofold mitigation (payment of the RAMS tariff and provision of Green Infrastructure relevant to the scale of the proposal) is required to be compliant with the Habitats Regulations. Mitigation measures should be secured via a planning obligation and conditions. Without such provisions it has not been possible to conclude no adverse effects of the development proposal on the integrity of internationally designated wildlife sites in relation to recreational disturbance.
526. The application is Schedule 2 development and subject to an Environmental Impact Assessment (EIA), which results in an additional consequence associated with the deficiencies set out within this report. The

conclusions of the HRA state that adverse effects on the integrity of internationally designated wildlife sites cannot be ruled out. Having considered the information contained within the Environmental Statement, other detailed supporting information and responses from consultation bodies, inadequacies associated with the information and the lack of certainty of mitigation identified within the Environmental Statement consequently result in a reasoned conclusion that significant effects of the proposed development on the environment will result when considered under the EIA Regulations.

527. Therefore, in conclusion it is considered that the submitted scheme if built will not have the significant regenerative effect on the East Norwich Strategic Regeneration Area that the policy framework is seeking to deliver. Although the scheme could deliver on a limited number of planning objectives and policies for the site, the level of economic and social benefits which would result from the development are not considered to outweigh the cumulatively significant levels of harm that would arise from the development. Firstly, in relation to the harmful impact on setting and significance of highly significant designated heritage assets for which the optimum viable use has not been demonstrated. Also, the harm resulting from the lack of provision of safe and sustainable accessibility to the site and delivery of identified social infrastructure requirements. In addition, there remain a significant number of topic areas where the information submitted is not sufficient to determine whether provisions are adequate or impacts acceptable. Finally, there are the associated significant effects on the environment and adverse effects on the integrity of internationally designated wildlife sites.

528. Importantly delivery in isolation without facilitating the connectivity between sites in the strategic regeneration area or providing co-ordinated delivery of new social and economic infrastructure could be prejudicial to future development of or restrict options for other sites that form part of the ENSRA. Collaboration with and between other East Norwich partners and land owners will be required to deliver the development that is required at East Norwich including key items of infrastructure.

529. In the opinion of officers, the public benefits identified would not be anywhere close to the levels required to outweigh the cumulative, significant harmful impacts of the development as identified throughout this report. Neither has any clear and convincing justification been demonstrated in order to justify any of the identified heritage harm. It is therefore recommended that planning permission should be refused.

Recommendation

530. To refuse application no. 22/00879/F Carrow Works, King Street for the following reasons:

1. The application fails to deliver many of the requirements of the site-specific policy that are necessary to ensure a highly sustainable mixed-use community is delivered at East Norwich. Many of the deficiencies in the application would also prejudice future development and restrict options across the remainder of the ENSRA due to the poor connectivity and limitations to movement that would arise as a result. The application is therefore contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024.

2. In the absence of any contrary evidence, the housing types proposed and particularly the predominance of flats is not consistent with the Greater Norwich Local Housing Needs Assessment. This along with the total lack of affordable housing results in an unsustainable housing development proposal, whereby the mix of dwellings by type and tenure fail to promote the creation of a mixed, diverse, inclusive and equitable community, contrary to GNLP 5, GNLPSTR.01 of the Greater Norwich Local Plan 2024, and policy DM1, DM12 of the Development Management Policies Local Plan 2014 and the National Planning Policy Framework (2023).
3. In the absence of a detailed economic strategy of proposed non-residential uses and their location across the site and the contributions that these will make to job creation, together with a demonstration of how the retail and leisure and office uses can be achieved without impacting on existing town centre use provision or office accommodation on sites designated for such uses nearby or encouraging car dependency for access, it is not possible to conclude that the non-residential uses proposed would comply with the detail set out within policy GNLP4, GNLP6, GNLPSTR.01 of the Greater Norwich Local Plan 2024 and policy DM1 of the Development Management Policies Local Plan 2014.
4. An Appropriate Assessment has concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in nitrate and/or phosphate levels which would further adversely affect the current unfavourable status of the Broads Special Area of Conservation. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of this habitats site and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM6 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).
5. An Appropriate Assessment has concluded that insufficient information has been submitted to demonstrate that this proposal would not result in an increase in recreational disturbance due to the impact of additional visits to Special Areas of Conservation (SACs and SPAs) in the Wash, Norfolk Coast and the Broads. There is a lack of a mechanism to secure payment of the RAMS (Recreational Access Mitigation Strategy) tariff, together with insufficient new on-site and enhancement of off-site green infrastructure provision both in terms of quantity and function to meet the informal recreational needs of the new residents. In adopting a precautionary approach, the Local Planning Authority is not satisfied that the proposal will not adversely affect the integrity of these habitats sites and the application is contrary to Regulation 63 of the Conservation of Habitats and Species Regulations 2017; policy GNLP3 of the Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).
6. The lack of certainty of mitigation to prevent adverse affects on the integrity of habitats site could cause significant, permanent negative impacts on the environment of international scale as identified within the Environmental Statement. The application is therefore contrary to policy GNLP3 of the

Greater Norwich Local Plan 2024; policy DM3, DM6 and DM8 of the Development Management Policies Local Plan 2014; and paragraphs 8, 11, 180, 186 and 188 of the National Planning Policy Framework (2023).

7. The individual buildings comprising the application site are distinguished by their significant architectural and historic interests; moreover, the group value of all heritage assets deriving from their links and associations with each other and this unique context, further reinforces their significance. The proposals have been found to result in high levels of harm to the setting and significance of a number of designated and non-designated heritage assets. The high levels of individual and cumulative harm caused is 'less than substantial harm', which is without clear and convincing justification and is not sufficiently outweighed by public benefits, and as such the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM9 of the Development Management Policies Local Plan 2014, paragraphs 201, 203, 205 -208 of the NPPF and Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
8. The fundamentals of the application surrounding heritage and access and movement remain to be resolved, it cannot be concluded that the design of the development fully respects or enhances the character and context of the local area or delivers a beautiful and well-designed exemplar of high quality, high density and locally distinctive design which respects its context and setting.

Outstanding issues surrounding heritage impacts will have implications for the interrelated land use, demolition, proposed heights and public open space outline parameters plans. The outstanding access and movement matters will greatly impact on the access and movement outline parameters plan and as site access is demonstrated across all of the parameter plans it impacts on these also. In addition the detailed Design Code is based on key layout principles set out on a Regulatory Plan which takes information from the outline parameters plans which are not considered acceptable.

The application is therefore contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3 of the Development Management Policies Local Plan 2014 and the design principles as set out in section 12 of the National Planning Policy Framework (2023).

9. The access proposed at the A1054 Bracondale / Martineau Lane roundabout is unsatisfactory to serve the proposed development by reason of inappropriate design contrary to current guidance and would be to the detriment of highway safety, contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM30 of the Development Management Policies Local Plan 2014 and, NPPF paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
10. The proposed development includes a new access at A1054 Bracondale, a strategic road that carries significant traffic movements. The vehicular movements associated with the use of the access would lead to conflict and interference with the passage of through vehicles and introduce a further point of possible traffic conflict, being detrimental to highway safety,

contrary to policy GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM30 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).

11. The proposed development does not adequately provide on and off-site facilities for pedestrians / cyclists / people with disabilities (those confined to a wheelchair or others with mobility difficulties) to encourage walking and cycling/wheeling to connect with and permeate through the site and link with adjacent sites and local services, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
12. The proposal fails to demonstrate that improved public transport access to the site can be achieved, to maximise sustainable transport opportunities which together could lead to reduced car dependency and a corresponding reduced level of car parking provision across the site. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM1, DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
13. The proposal does not provide adequate access for all modes and would be likely to give rise to conditions detrimental to safe sustainable development in transport terms, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9 of the National Planning Policy Framework (2023).
14. The application is not supported by sufficient highways and transport information, including a travel plan and parking strategy to demonstrate that the proposed development will not be prejudicial to the safe and satisfactory functioning of the highway or that the proposed development represents a sustainable form of development, contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM12, DM13, DM28, DM30, DM31 and DM32 of the Development Management Policies Local Plan 2014 and paragraph 8 and Section 9, including paragraph 115 of the National Planning Policy Framework (2023).
15. There is no provision within the application for social infrastructure in the form of a serviced site for a two form entry primary school on this strategic development site. The application is therefore contrary to policy GNLP4, and GNLPSTR.01 of the Greater Norwich Local Plan 2024 and paragraph 99 of the NPPF which requires sufficient choice of school places with great weight given to the creation, expansion or altering schools to meet the needs of existing and new communities. The application is also contrary to policy DM1 which requires provision to be made for enhanced and accessible education opportunities.

16. There is currently no provision within the application for improvements to health care infrastructure in the form of provision of land for a health facility sufficient to serve the East Norwich development as a whole. The application is therefore contrary to policy GNLP4, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024. The application is also contrary to policy DM1 which requires provision to be made for improved health and well-being opportunities and NPPF paragraph 97 which requires decisions to provide social, recreational and cultural facilities and services the community needs, ensuring an integrated approach to their location.
17. The application does not provide sufficient information to allow the impact of height and associated impacts on daylight and sunlight on residential amenity of existing and future occupiers of the development or on areas of private and public amenity space including riverside paths to be determined. In the absence of this information, it must be concluded that the application is contrary to policy DM2, DM3, DM12 and DM13 of the Development Management Policies Local Plan 2014; and paragraph 135(f) of the National Planning Policy Framework (2023).
18. The application does not provide sufficient information to fully assess the impact of noise on residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan; policy DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011; criterion (f) of paragraph 135 and paragraph 191 and 216(e) of the National Planning Policy Framework (2023).
19. The application does not provide sufficient information to fully assess the air quality impacts on the residential amenity of future occupiers of the development. It is therefore not possible to determine whether mitigation measures are required to secure an appropriate standard of amenity for the occupiers of the new development without prejudicing the continued operation of the adjacent safeguarded mineral railhead site to the east. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM2, DM3, DM11 and DM13 of the Development Management Policies Local Plan 2014; policy CS16 of the Norfolk Minerals and Waste Core Strategy 2011 and paragraph 192 of the National Planning Policy Framework (2023).
20. The application does not provide sufficient information to fully assess the green infrastructure, open space and landscaping provisions of the development. In the absence of this information, it must be concluded that the application is contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM3, DM6, DM7 and DM8 of the Development Management Policies Local Plan 2014 and paragraph 88, 97, 102 and 135 of the National Planning Policy Framework (2023).

21. The application proposes the loss of visually significant protected trees that has not been justified as it would not result in a substantially improved overall approach to the design and landscaping of the development. The development is contrary to policy GNLP2, GNLP3 and GNLPSTR.01 of the Greater Norwich Local Plan 2024; policy DM7 of the Development Management Policies Local Plan 2014 and paragraph 136 of the National Planning Policy Framework (2023).
22. The application does not provide sufficient information to fully assess the biodiversity impacts of the development and determine whether significant harm will result from the development taking place. It is not possible to determine whether mitigation measures are required to protect and secure an enhancement of biodiversity such that a net gain in biodiversity is achieved. In the absence of this information, it must be concluded that the application is contrary to policy GNLP3, GNLP7.1 and GNLPSTR. 01 of the Greater Norwich Local Plan 2024; policy DM3 and DM6 of the Development Management Policies Local Plan 2014; paragraph 180(d), 185 and 186 of the National Planning Policy Framework (2023).
23. The application does not provide sufficient information to demonstrate satisfactory management of flood risk from all sources and to ensure that the sustainable drainage systems proposed will operate as designed for the lifetime of the development to prevent flooding in accordance with paragraph 173 and 175 of the National Planning Policy Framework (2023); policy GNLP2, GNLP7.1 and GNLPSTR.01 of the Greater Norwich Local Plan 2024 and policy DM3 and DM5 of the Development Management Policies Local Plan 2014.

Article 35(2) Statement

The local planning authority in making its decision has had due regard to paragraph 38 of the National Planning Policy Framework as well as the development plan, national planning policy, Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and the Conservation of Habitats and Species Regulations 2017 and other material considerations. The local planning authority has advised the applicant of the significant issues with the content of the application and deficiencies with some of the supporting information which have resulted in the reasons for refusal outlined above. There has been no further engagement from the applicant on these technical matters.

Appendices: Four

Contact officer: Senior Planner

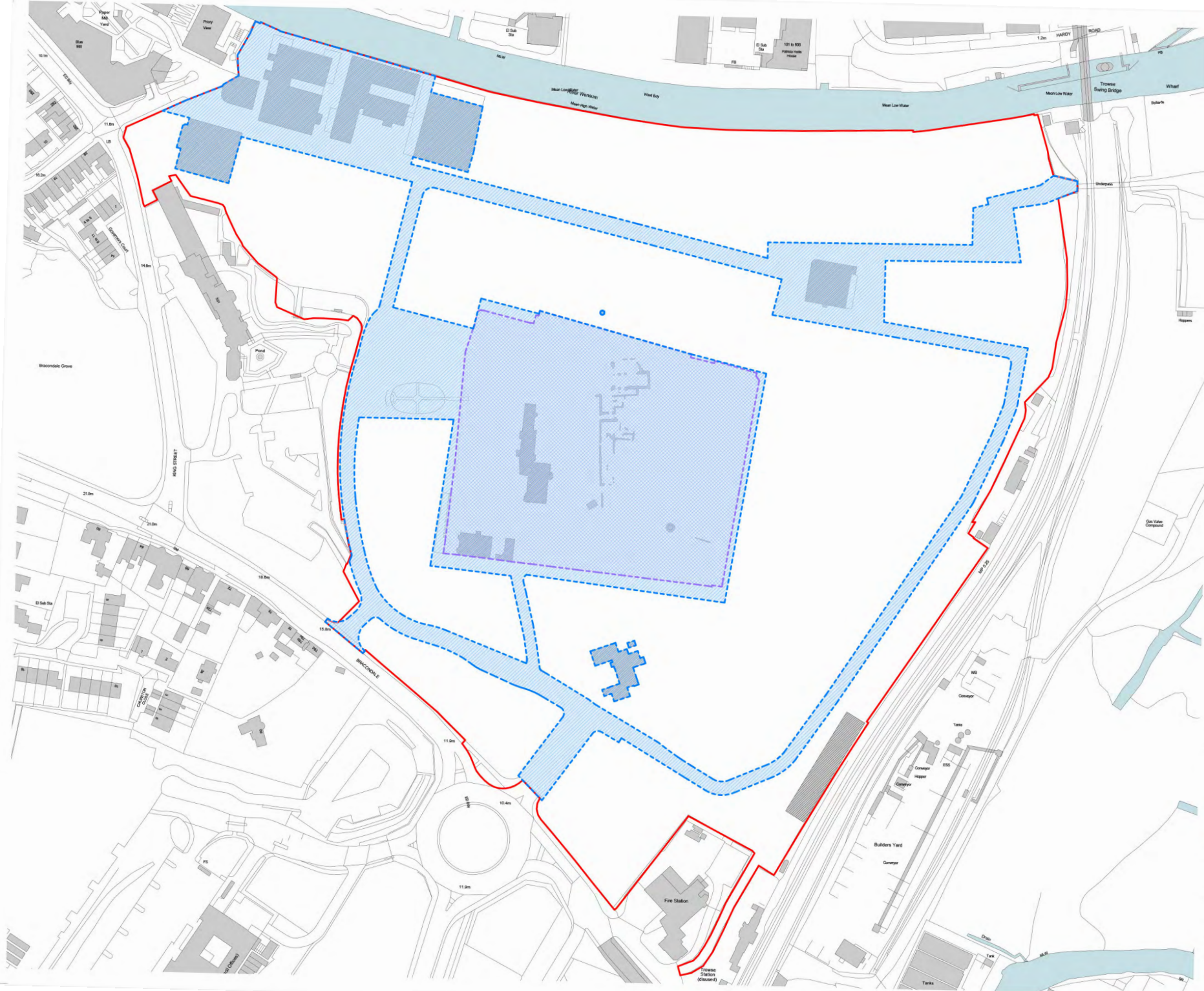
Name: Sarah Hinchcliffe

Telephone number: 01603 989413

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- Key**
- Hybrid Application Boundary
 - Detailed Application
 - Existing Buildings To Be Retained
 - Scheduled Monument

P1	27.06.22	Planning Submission	DM	JP
Rev	Date	Description	Drawn	Chd
Drawing Status				
For Planning				

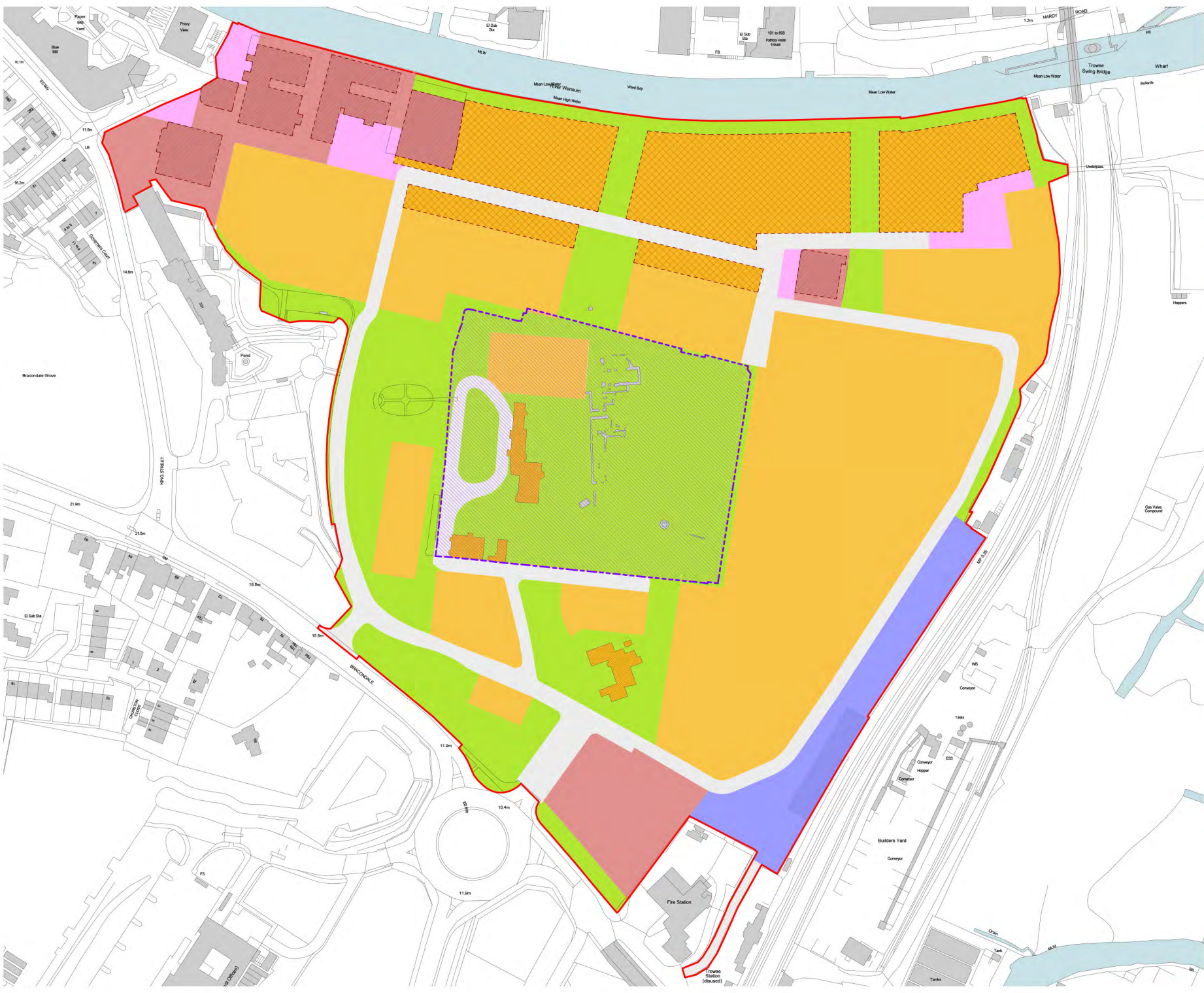


Project
Carrow Works, Norwich

Drawing Title
**Parameter Plan
Hybrid Application Boundaries**

Scale @A1 1:1000 Job Ref: 62022
Drawing No. PP-01 Revision: P1
Scale Bar 0 10 20 30 40 50 m
Sheet Code 62022-JTP-PP-01 - Hybrid Application Boundaries - P1

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Key

- Hybrid Application Boundary
- Existing Buildings
- Class C3 (including internal access, parking, incidental play spaces and associated infrastructure)
- Retained Buildings Class C3
- Class C3 with flexible Class E & with flexible Class C3 at Ground Floor Level
- Class E
- Retained Buildings Class E
- Employment (Class B)
- Scheduled Monument
- Landscape and Open Space (Please refer to Drawing No. PP-04 for the details of the landscape and open space).
- Public Realm
- Main Infrastructure

Notes

All land uses can deviate +/- 2m within the application boundary, subject to on-site or heritage constraints.

P1	27.06.22	Planning Submission:	BM	IF
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				

Client

Fuel Properties

jtp

JTP Studios, Unit 5
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Project

Carrow Works, Nowrich

Drawing Title

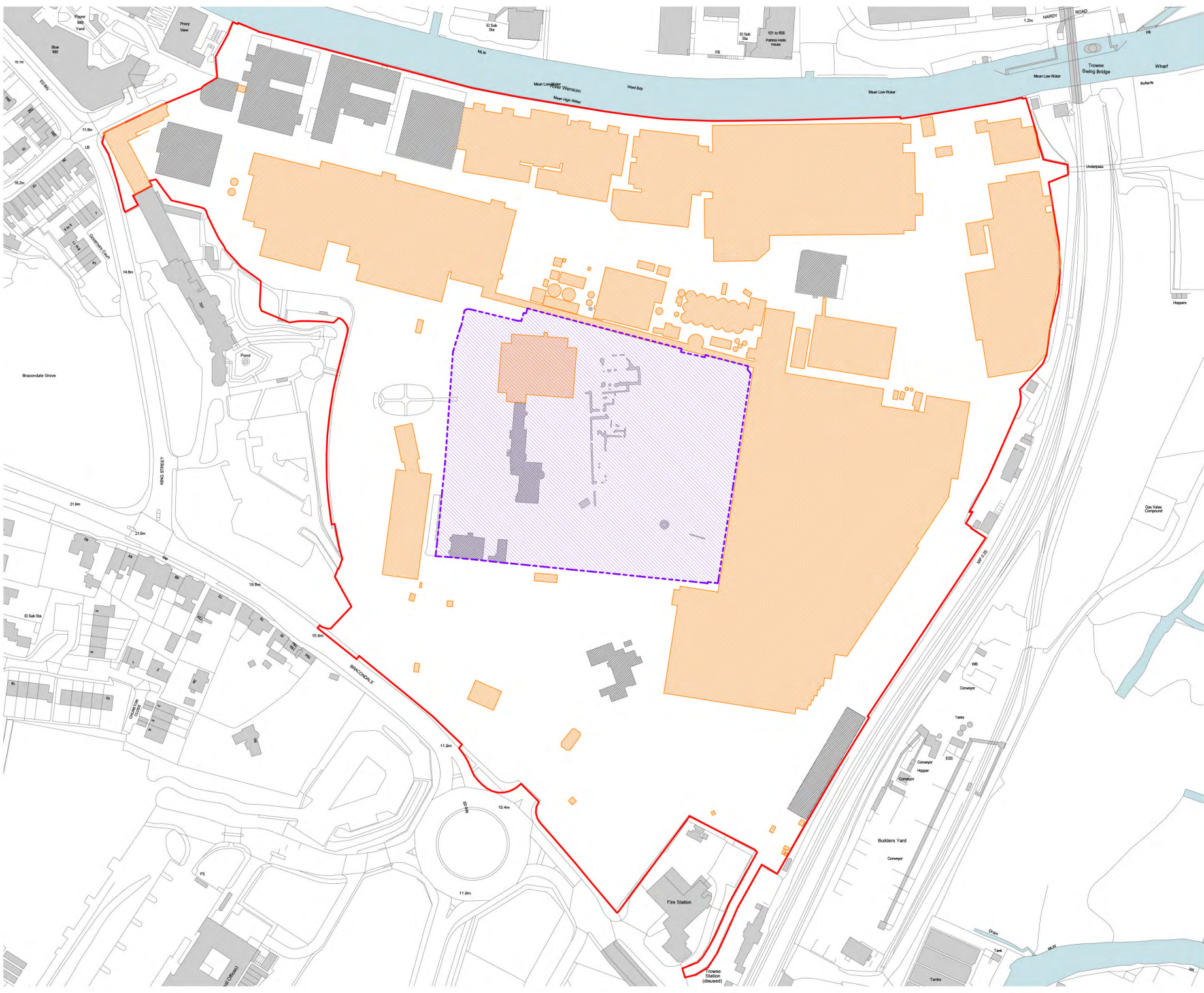
**Parameter Plan
Land Use Plan**

Scale @A1 1:1000 Job Ref. 02022

Drawing No. PP-02 Revision: P1

Scale Bar 0 10 20 30 40 50 m

Sheet Code 02022-JTP-PP-02 - Land Use Plan - P1



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- Key
- Hybrid Application Boundary
 - Existing Buildings To Be Retained
 - Existing Buildings To Be Demolished
 - Scheduled Monument

P1	27.06.22	Planning Submission:	BM	IF
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				



Project
Carrow Works, Nowrich

Drawing Title
Parameter Plan
Demolition Plan

Scale @A1	1:1000	Job Ref.	02022
Drawing No.	PP-03	Revision:	P1
Scale Bar	0 10 20 30 40 50 m		
Sheet Code	02022-JTP-PP-03 - Demolition Plan - P1		



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- Key
- Hybrid Application Boundary
 - Existing Buildings To Be Retained
 - Main Infrastructure
 - Scheduled Monument
 - Public Open Space (including SuDS and play)
 - Private Open Space
 - Existing Trees To Be Retained
 - Riverside Walk
 - Public Realm
 - Indicative Location of Children's Play Space*
 - Indicative Location of SuDS Features (including surface attenuation ponds/basins, storage tanks and rain gardens)*
 - Indicative Green and Blue Link (alignment and detail to be agreed at RMA stages)

Notes

All land uses can deviate +/- 2m within the application boundary, subject to on-site and heritage constraints.

*Exact location, shape and sizes of SuDS features and play areas are indicative only.

Attenuation will also be provided on-plot for podium buildings.

P1	27.06.22	Planning Submission	BM	IF
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				

Client

Fuel
Properties

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Project

Carrow Works, Nowrich

Drawing Title

Parameter Plan
Public Open Space

Scale @A1 1:1000 Job Ref. 02022

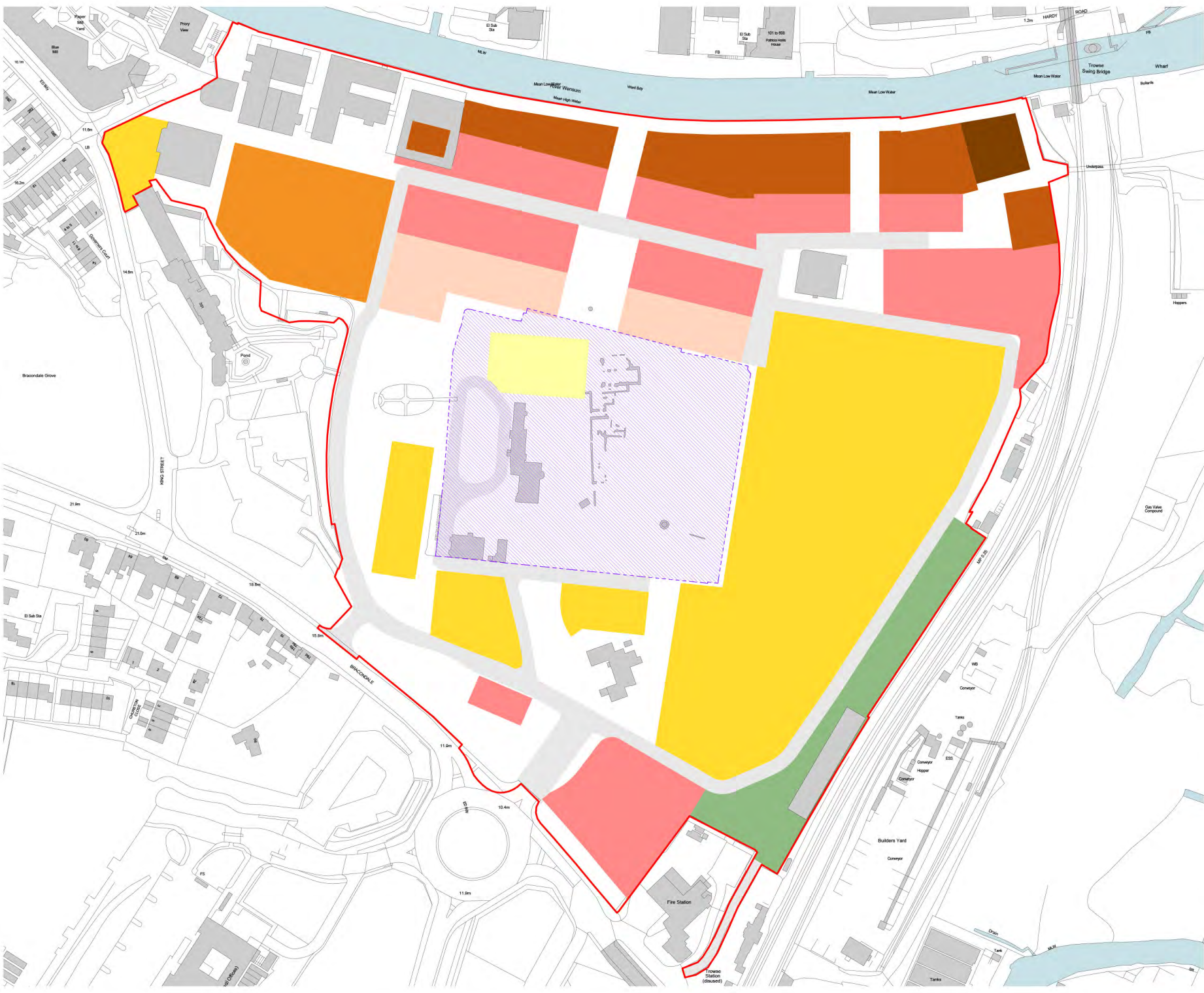
Drawing No. PP-04 Revision. P1

Scale Bar

0 10 20 30 40 50 m

Sheet Code

02022-JTP-PP-04 - Public Open Space - P1



Notes

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Key

- Application Boundary Line
- 1-2 storeys (12.05m maximum ridge height)
- 1-2 storeys (10.22m maximum ridge height)
- 2-3 storeys (12.05m maximum ridge height)
- 2-4 storeys (19.00m maximum ridge height)
- 3-6 storeys (25.30m maximum ridge height)
- 6-8 storeys (31.60m maximum ridge height)
- 8-11 storeys (41.05m maximum ridge height)
- 11-14 storeys (60.50m maximum ridge height)
- Scheduled Monument

Notes

The extent of the bulging height parameter envelop can deviate laterally +/-2m within the application boundary, subject to on-site and heritage constraints.

The height parameters set out in the Building Heights Parameter Plan are to maximum ridge heights and include parapet heights and liftcore overruns. The heights are set from existing ground levels, not a proposed Finished Floor Level and therefore account for any ground works that may need to be undertaken. Each of the parameter levels has been set at such a level to allow for flexibility to be introduced in roof line and the steepness of roof pitches in order to create variety and interest.

P1	27.06.22	Planning Submission.	BM	IF
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				

Client

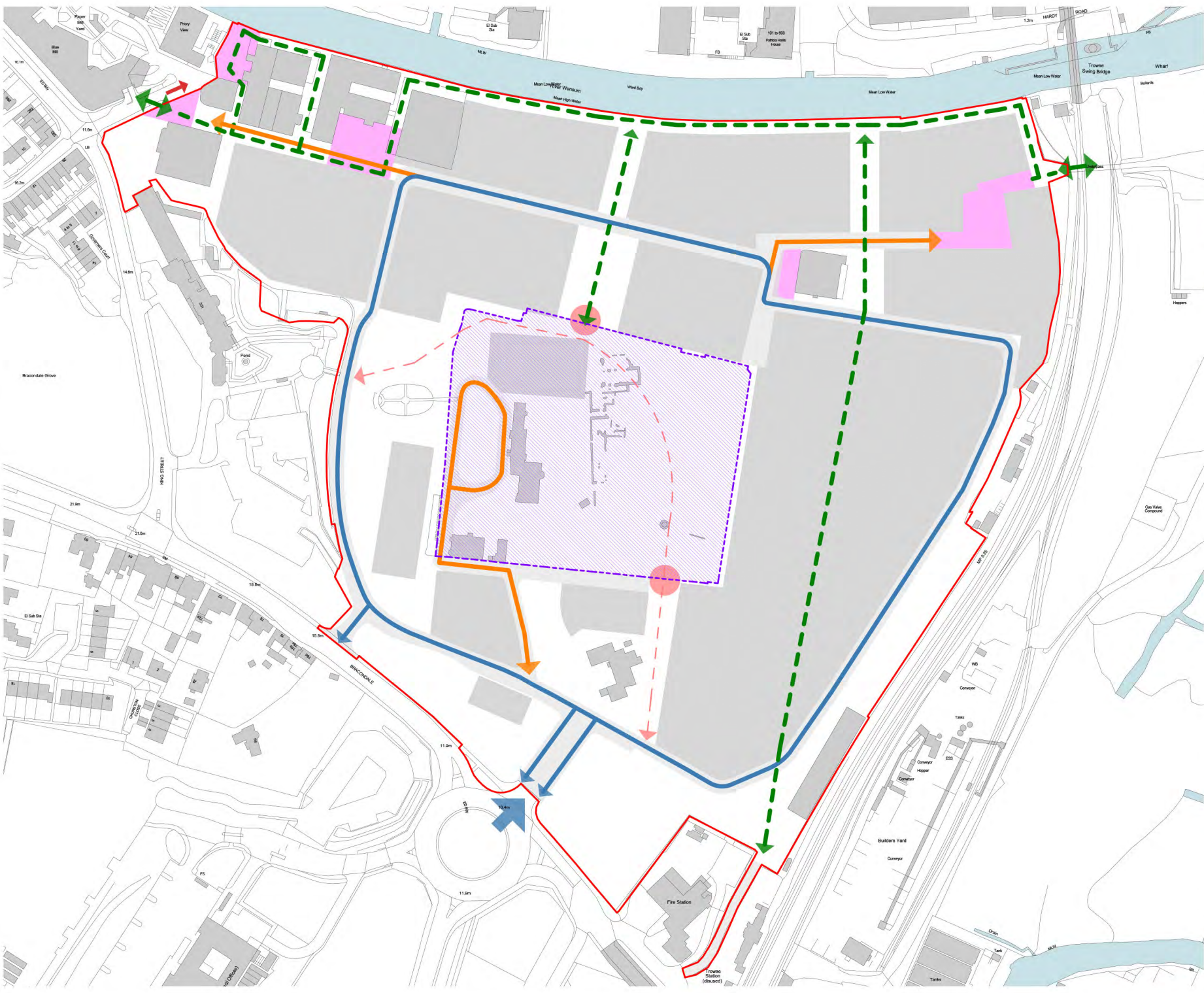
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Project
Carrow Works, Nowrich

Drawing Title
Parameter Plan
Proposed Heights

Scale @A1 1:1000 Job Ref. 02022
Drawing No. PP-05 Revision. P1
Scale Bar 0 10 20 30 40 50 m
Sheet Code 02022-JTP-PP-05 - Proposed Heights - P1



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Key

- Hybrid Application Boundary
- Development Parcel
- Main Site Access (Vehicular, bus, pedestrian, cycle and secondary)
- Pedestrian and Cycle Site Access Only
- Pedestrian Site Access Only
- Emergency Vehicular Access
- Primary Street and Bus Route
- Secondary Street
- Indicative Footpaths and Cycleways
- Pedestrian Only Access to Gardens
- Public Squares
- Scheduled Monument

Notes

The proposed primary and secondary streets include carriageway, green verges, street plantings, sewers, footways and cycleways.

Alignment of the secondary streets, footways and cyclepaths are indicative only and subject to detailed design.

Alignment and design of the bridge crossing over the river is subject to detailed design.

P1	27.06.22	Planning Submission:	BM	IF
Rev	Date	Description	Drawn	Chkd
Drawing Status				
For Planning				

Client

Fuel Properties

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Project

Carrow Works, Nowrich

Drawing Title

Parameter Plan
Access & Movement

Scale @A1 1:1000 Job Ref: 02022

Drawing No. PP-06 Revision: P1

Scale Bar 0 10 20 30 40 50 m

Sheet Code 02022-JTP-PP-06 - Access & Movement - P1



0 1 2 5
Scale 1:100 m

Notes

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- Where colours other than black or grey are used, the drawing must be plotted in colour.
- For status "C" (Construction) drawings all dimensions are to be checked on site by the contractor, scaling is for Local Authority purposes only.
- Unless otherwise indicated, all dimensions are in millimeters.
- All information on this drawing is to be read in conjunction with the relevant Donald Insall Associates specification and trade contractor's drawings and information by specialists.
- In the event of any discrepancy, please contact us immediately.
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Drawing Status

1F Feasibility

2S Sketch Design

3P Planning

4B Building Control

4D Developed Design

4M Measurement

4T Tender

5C Construction

6R Record

Rev	Date	Dem	Auth	Revision
2	29-06-22	NXA	-	Planning Issue
1	27-06-22	NXA	-	Preparation for submission following Icen and client review.
0	22-06-22	NXA	-	Design development review with Icen
Rev	Date	Dem	Auth	Revision

Rev	Date	Dem	Auth	Revision
2	29-06-22	NXA	-	Planning Issue
1	27-06-22	NXA	-	Preparation for submission following Icen and client review.
0	22-06-22	NXA	-	Design development review with Icen
Rev	Date	Dem	Auth	Revision

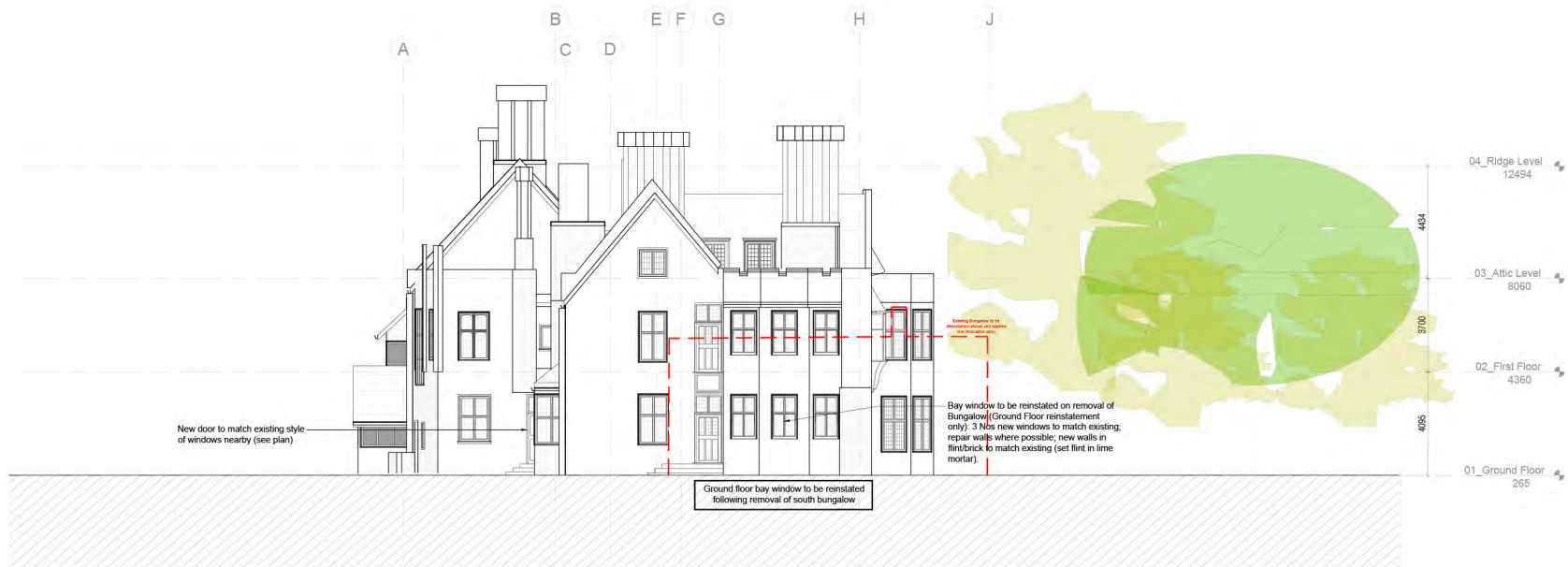
Donald Insall Associates
Chartered Architects and Historic Building Consultants

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Milton, Cambridge CB24 6WZ
(+44) 01223 303 111
cambridge@insall-architects.co.uk

Carrow Works, Norwich

Carrow Abbey: Proposed Elevations
West (Main) and East (Garden)

Project	CWN.01		No	DR-2200	
Scale (A1)	1:100		Status	3P	Revision
					2



1 South Elevation (To Car Park)
2201
1:100



2 North Elevation (to Dining Hall)
2201
1:100

Notes

- Any dwg format drawing is to be read in conjunction with and at the scale of the accompanying pdf.
- Where colours other than black or grey are used, the drawing must be printed in colour.
- For status "C" (Construction) drawings all dimensions are to be checked on site by the contractor, scaling is for Local Authority purposes only.
- Unless otherwise indicated, all dimensions are in millimeters.
- All information on this drawing is to be read in conjunction with the relevant Donald Insall Associates specification and trade contractors' drawings and information by specialists.
- In the event of any discrepancy, please contact us immediately.
- This drawing may contain survey information for others and is to be used solely for the purposes for which it was issued.
- These are uncontrolled documents issued for information purposes only. If you have any queries regarding the drawings, please contact DIA immediately.
- Please note DIA cannot be held responsible for any errors arising from changes made to an uncontrolled dwg file.

Drawing Status

1F Feasibility

2S Sketch Design

3P Planning

4B Building Control

4D Developed Design

4M Measurement

4T Tender

5C Construction

6R Record

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Rev	Date	Dwn	Auth	Revision
2	20-06-22	NKA	-	Planning Issue
1	27-06-22	NKA	-	Preparation for submission following licen and client review.
0	23-06-22	NKA	-	Design development review with licen

Donald Insall Associates

Chartered Architects and Historic Building Consultants

Carrow Works, Norwich

Carrow Abbey: Proposed Elevations
South and North

Project

CWN.01

Scale (A1)

1:100

No

DR-2201

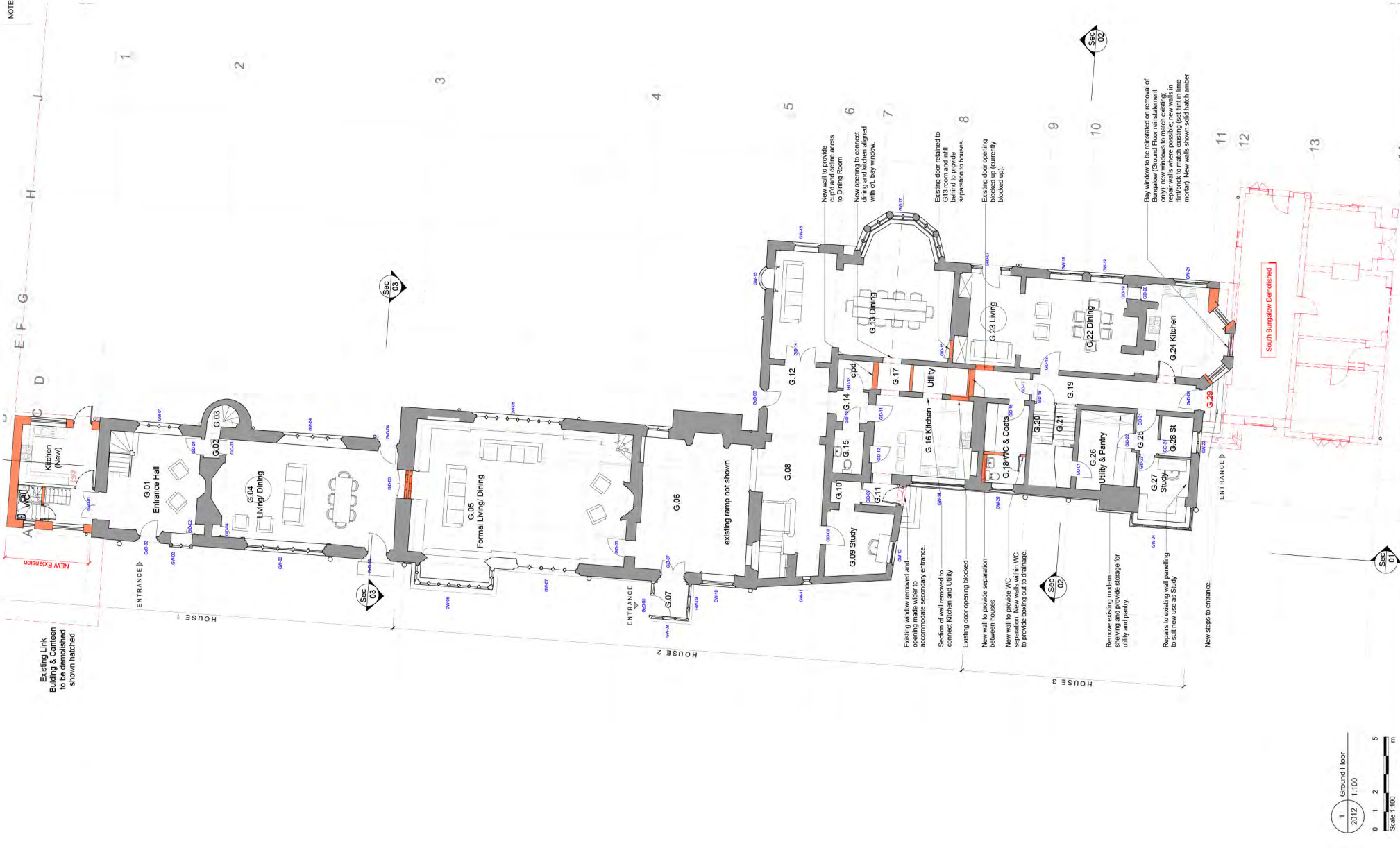
Status

3P

Revision

2

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Milton, Cambridge CB24 6WZ
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cambridge@insall-architects.co.uk



Notes		Drawing Status		Project		Milton Hall, Ely Road, Milton Cambridge CB3 0JH (+44) 01223 303 111 cambridge@insall-architects.co.uk	
1	Any new layout drawings to be used in conjunction with and at the scale of the accompanying set of drawings.	A	Approved	1	2012	No	
2	Where colour other than black, or grey are used, the drawings must be printed in colour.	S	Sketch Design	2	2012	Status	Revision
3	Drawings must be submitted to the relevant authority for approval and are to be marked on only by the contractor.	P	Planning	3	2012	3P	3
4	All drawings must be submitted to the relevant authority for approval.	B	Building Control	4	2012	1-100	
5	All information on this drawing is to be used in conjunction with the relevant Donald Insall Associates drawing.	D	Developed Design	5	2012		
6	Drawings must be submitted to the relevant authority for approval.	C	Construction	6	2012		
7	In the event of any discrepancy, the client must be contacted immediately to resolve the matter.	R	Revised	7	2012		
8	Drawings must be submitted to the relevant authority for approval.			8	2012		
9	Drawings must be submitted to the relevant authority for approval.			9	2012		
10	Drawings must be submitted to the relevant authority for approval.			10	2012		
11	Drawings must be submitted to the relevant authority for approval.			11	2012		
12	Drawings must be submitted to the relevant authority for approval.			12	2012		
13	Drawings must be submitted to the relevant authority for approval.			13	2012		
14	Drawings must be submitted to the relevant authority for approval.			14	2012		
15	Drawings must be submitted to the relevant authority for approval.			15	2012		
16	Drawings must be submitted to the relevant authority for approval.			16	2012		
17	Drawings must be submitted to the relevant authority for approval.			17	2012		
18	Drawings must be submitted to the relevant authority for approval.			18	2012		
19	Drawings must be submitted to the relevant authority for approval.			19	2012		
20	Drawings must be submitted to the relevant authority for approval.			20	2012		
21	Drawings must be submitted to the relevant authority for approval.			21	2012		
22	Drawings must be submitted to the relevant authority for approval.			22	2012		
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26	Drawings must be submitted to the relevant authority for approval.			26	2012		
27	Drawings must be submitted to the relevant authority for approval.			27	2012		
28	Drawings must be submitted to the relevant authority for approval.			28	2012		
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54	Drawings must be submitted to the relevant authority for approval.			54	2012		
55	Drawings must be submitted to the relevant authority for approval.			55	2012		
56	Drawings must be submitted to the relevant authority for approval.			56	2012		

Notes

Do not scale from this drawing.
 All construction must visit the site and be responsible for taking and checking dimensions.
 All construction information should be taken from figured dimensions only.
 Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.
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Key

Footprint of existing building on site



P127.06.22Planning Submission:BMIF

Rev

Date

Description

Drawn

Chkd

Drawing Status

For Planning

Client

F

Fuel
Properties

JTP Studios, Unit 5
The Burn Warehouse
Pennyngton Street
London, E1W 2AF
+44 (0) 20 7017 1780
www.jtp.co.uk

Project

Carrow Works, Nowrich

Drawing Title

Proposed Site Layout

Dining Hall - Ground Floor Plan

Scale @A1As Indicated

Job Ref. 02022

Drawing No. MP-04

Revision: P1

Scale Bar

01020304050 m

Sheet Code

02022-JTP-MP-04 - Dining Hall - Ground Floor Plan - P1

Notes

Do not scale from this drawing.
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North Elevation
1 : 100



East Elevation
1 : 100



South Elevation
1 : 100



West Elevation
1 : 100

P1 27.08.22 Planning Submission: BM IF

Rev Date Description Drawn Chkd

Drawing Status

For Planning

Client



Project
Carrow Works, Nowrich

Drawing Title
Proposed Site Layout
Dining Hall - Street Elevations

Scale @A1 1 : 100 Job Ref: 02022

Drawing No. MP-07 Revision: P1

Scale Bar 0 10 20 30 40 50 m

Sheet Code

02022-JTP-MP-07 - Dining Hall - Street Elevations - P1