

Report to Planning applications committee

Item

14 March 2019

Report of Head of planning services

Subject Application nos 18/01286/F & 18/01287/L - Barrack Street Development Site Barrack Street Norwich

4(a)

Reason for referral Objection and significant departure from development plan

Ward:	Thorpe Hamlet
Case officer	Joy Brown - joybrown@norwich.gov.uk

Development proposal		
18/01286/F - Demolition of existing buildings and structures; erection of 218 dwellings; conversion, refurbishment and extension of two Grade II Listed Cottages, erection of 310sqm of commercial floorspace (Class A1-A5 use) and 152sqm of Museum floorspace (D1 use), with associated works.		
18/01287/L - Conversion, refurbishment and extension of 77-79 Barrack Street and alterations to the western boundary wall of the site.		
Representations		
Comments on application as submitted		
Object	Comment	Support
258	3	0
Comments on revisions		
Object	Comment	Support
54	0	0

Main issues	Key considerations
1 Principle of development	Loss of office led mixed use development and provision of a residential led scheme
2 Design	Views, layout, routes through the site, height and massing, external appearance and detailing, public realm
3 Heritage	Demolition, printworks museum, 77-79 Barrack Street, St James Church, St James Mill, City Walls
4 Trees	Loss of trees and replacement planting
5 Landscaping and open space	Hard and soft landscaping, public open space and play areas.
6 Transport	Vehicular access, vehicular movements, routes through the site, travel plan, car parking, cycle parking and bin storage
7 Amenity	Impact upon neighbouring residents, living conditions for future residents, noise and air quality

Main issues	Key considerations
8 Energy and water	Fabric first and renewable energy, water efficiency
9 Flood risk	Sequential and exceptions test, Sustainable Urban Drainage Systems, Floor levels,
10 Biodiversity	Protected species, Mitigation and enhancement
11 Contamination	Potential contamination on site and mitigation
12 Affordable housing	On site provision – amount and tenure
Expiry date	10 December 2018 (Extension of time agreed until 21 st March 2019)
Recommendation	18/01286/F – Approve subject to s106 agreement 18/01287/L – Approve

The site and surroundings

1. The 1.74 hectares site is situated on the south side of Barrack Street, directly to the east of St James' Mill and the Puppet Theatre. The site extends south to the River Wensum and is part of a larger site owned by Jarrolds.
2. The site was formally occupied by Jarrolds Printworks but is now largely vacant. The site currently comprises the following features:
 - The floor slabs of the former industrial buildings which extend across much of the site.
 - A temporary surface car park within the eastern part of the site
 - The remains of the City Walls (a Scheduled Ancient Monument)
 - A pair of listed cottages fronting Barrack Street (77-79) and a row of terrace properties. There is also a garage block.
 - St James' Mill Annex which currently houses the John Jarrold Printing Museum.
 - Maintenance building (unoccupied) which is attached to the City Wall remains.
 - Mature trees along the Barrack Street frontage
 - Occasional trees and shrubs adjoining the river, including mature Willows
 - Small areas of grass
 - External wall of the former print works building (adjacent to the Puppet Theatre along the northern boundary and south of existing dwellings).
 - Site hoardings.
3. This is a large edge of city site just inside the inner ring road (A147) and is surrounded by a wide range of existing uses. To the north of Barrack Street is a residential area characterised by terraced houses; there are also a number of commercial properties including a dentist, offices for QD and a car sales premises. The areas to the east and west of the site are in employment use. To the west of the site is St James' Court which comprises of three office blocks accessed via Whitefriars. St James' Mill (Grade I listed) is also located to the west of the site and is currently in employment use as office space.
4. To the east of the site are two office blocks known as 'Dragonfly House' and 'Kingfisher House' which are accessed from Barrack Street via Gilders Way. Land immediately adjacent to the eastern boundary of the application site has consent for new office buildings with an element of ground floor retail. These office blocks benefit from implemented consent and are known as office blocks F1 and F2 under the following permissions: 06/00724/F, 11/02216/RM and 11/02178/F. Part of the wider site also benefits from outline consent for the erection of up to 200 dwellings.

5. The Norwich Crown Court, County Court and Magistrates Court are located to the south of the River Wensum opposite the site. The Jarrolds Bridge is a pedestrian and cycle bridge located to the east of the site which connects the land north of the River Wensum to the core of the City Centre to the south.

Constraints

6. The western section of the site is within the City Centre Conservation Area and the site also contains the remains of the city wall (Scheduled Ancient Monument), two Grade II listed cottages and two locally listed cottages. The site is adjacent to St James Mill which is a Grade I listed building. The site is situated within the area of main archaeological interest and it has been identified that the site has the potential for significant underground archaeological remains.
7. There are trees situated along the northern, western and southern boundaries of the site. A weeping willow situated to the south of St James Mill is subject to a Tree Preservation Order with the other trees which are situated within the conservation area also being protected. There is a central area of vegetation located to the east of the city wall. The site is within 1km of St James Pit SSSI and Mousehold Heath which is a Local Nature Reserve and County Wildlife Site. Train Wood is a non-designated County Wildlife Site that is also situated within 1km.
8. The majority of the site is situated within flood zone 2 and a small part of the site, to the south east is classified in flood zone 3. As such the majority of the site is at 'medium risk' from fluvial flooding with a small part at 'medium to high risk' of fluvial flooding.
9. The site is situated within the Norwich Air Quality Management Area.
10. The topography of the site is largely flat with a slight slope downhill towards the River Wensum. There are views into the site from the higher ground to the north and east.
11. The majority of the site is allocated within the Norwich Site Allocations Site Specific Policies DPD for mixed use redevelopment within policies CC17a 'Barrack Street' and CC17b 'Whitefriars'.

Relevant planning history

12. The site has an extensive planning history with the most relevant applications being listed below. In summary, in March 2007, as part of a wider hybrid application on the site, permission was granted for the erection of 20,500sqm of offices (of which up to 1,500sqm could be used as a shop unit) 200 residential units, a 60 bed hotel, 637 car parking spaces, a riverside walk and a footbridge with associated accesses and ground works (06/00724/F). Subsequently, a number of conditions and reserved matters were discharged, which facilitated the implementation and construction of the office building to the east (Dragonfly and Kingfisher House). In April 2011 conservation area consent was granted for the demolition of the former printing works building with the retention of the façade onto Barrack Street and in May 2011 planning permission was granted for a temporary replacement car park with 281 spaces (07/01448/F).

13. In September 2008 a reserved matters application for two further office buildings was submitted and subsequently approved (08/00538/RM). This permission has been implemented, although the buildings have not yet been constructed.
14. More recently outline planning consent has been granted for the erection of up to 200 homes, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces with all matters reserved (15/01927/O) on land immediately to the east of this site.

Ref	Proposal	Decision	Date
06/00724/F	Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme).	APPR	23/03/2007
07/00391/D	Condition 31): Prior to their demolition the former stable building and garage to the former Brewery shall be recorded by a suitably qualified and experienced historic buildings consultant for previous planning application (06/00724/F), 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme).	APPR	24/05/2007
07/00898/D	Details of Condition 15: Ground Conditions and Condition 35: Archaeology of previous planning permission 06/00724/F 'Redevelopment of site'.	APPR	21/10/2008
07/00925/D	Part Condition 7 (Block D) a)External materials (samples); b)Typical windows, doors; c)Typical eaves, verge, parapet and roof details; d)Typical projecting roof canopies of previous planning permission (App. No.06/00724/F).	APPR	21/10/2008
07/00955/D	Condition 10: Details of Construction Phasing Plan, a) Temporary car parking; b) Temporary access and haul routes for construction traffic; c) Compounds and site huts of previous planning permission	APPR	21/11/2008

Ref	Proposal	Decision	Date
	(App. No. 06/00724/F), 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works'.		
07/01039/D	Part Condition 11(Block D): a) Details of on-site roads, footpaths and cycleways (including surface treatments); b) Details of schemes for the discharge of foul and surface water; of previous planning permission (App. No. 06/00724/F) 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme).'	APPR	21/10/2008
07/01363/D	Details of Condition 13(a); Secondary Vehicle Access, of previous planning permission 06/00724/F: 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme)'.	APPR	10/06/2008
07/01441/C	Demolition of former printing works building (retention of facade onto Barrack Street).	APPR	18/04/2008
07/01448/F	Provision of temporary replacement car park (281 spaces) and associated new vehicle egress onto Barrack Street.	APPR	22/05/2008
08/00538/RM	Part Condition 2 : (Plots F1 and F2) Layout, Scale, Appearance and Landscaping (including 2c: Materials; Part 2d: Car Parking; 2h): Typical doors and windows) for 8,079 sq.m. office space (B1) comprising 198 sq.m. of ancillary retail space; (Reseved Matters	APPR	05/09/2008

Ref	Proposal	Decision	Date
	Application of Outline Consent 06/00724/F).		
08/00557/D	Condition 3: Details of works to make good north and east elevations of museum building; Condition 6: Design of decorative boarding on the eastern boundary, for previous Conservation Area Consent (App. No. 07/01441/C " Demolition of former printing works building (retention of facade onto Barrack Street)".	APPR	29/07/2008
08/00678/D	Condition 8a): Details of bird and bat roosting and nesting facilities; 8b): Details of walls and fences; 8c): External plant and machinery; Condition; 11c) Details of lighting; Condition 17a: Details of landscaping, lighting for riverside walk; Condition 18: Details of emergency vehicle access; for previous planning permission (App. No. 06/00724/F), 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme)'.	APPR	24/11/2008
08/00708/D	Condition 30: Details of (Zone D and F) emergency response plan for previous planning permission (App. No. 06/00724/F) "Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme)".	APPR	30/07/2008
09/01162/D	Condition 5 - programme of archaeological works of previous Conservation Area Consent (App. No. 07/01441/C) 'Demolition of former printing works building (retention of facade onto Barrack Street)'.	APPR	27/04/2010

Ref	Proposal	Decision	Date
11/02178/D	<p>Details of Condition 2e: Cycle parking; Condition 2f: Refuse Storage; Condition 2g: delivery, picking up and dropping off points; Condition 2j: bird and bat roosting and nesting facilities; Condition 2k: fume and outlet points; Condition 10: Construction phasing plan; Condition 13c: Discharge of foul and surface water; Condition 15a: Desk Study Investigation (contamination); Condition 32: Programme of archaeological work; Condition 34: Legal contract with archaeological contractor and Condition 48: details of rainwater harvesting; energy production from renewable sources; re-use of existing site materials; of previous permission 06/00724/F 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme).'</p>	APPR	26/06/2014
11/02216/RM	<p>Details of Condition 2a: proposed finished levels and contours (Zone F); Condition 2b: typical walls and fences (where applicable) (Zone F); Condition 2i: minor artefacts and structures (Zone F); Condition 17b: design, landscaping and lighting of River Walk West (Zone F) of previous hybrid permission 06/00724/F 'Redevelopment of site comprising of 20,500sq.m. offices (Class B1) gross floor area of which up to 1,500sq.m. for shop units (Class A1 and A3) ; 200 residential units; 60 bed hotel; 637 car parking spaces, riverside walk and footbridge, associated accesses and ground works (Revised Scheme).'</p>	APPR	29/06/2012
11/02223/O	<p>Residential development of 200 units and associated works, including access, on Zones A and E of former Jarrold Printworks.</p>	APPR	14/02/2013
15/01927/O	<p>Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open</p>	APPR	12/08/2016

Ref	Proposal	Decision	Date
	space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces.		

The proposal

15. The application seeks full planning permission for the demolition of existing buildings and structures, the erection of 218 dwellings, the conversion, refurbishment and extension of two Grade II Listed Cottage, the, erection of 310sqm of commercial floorspace (Class A1-A5 use) and the provision of a 152sqm Museum (D1 use) along with all associated works. Listed building consent is also sought for the conversion, refurbishment and extension of the two listed cottages and works to the western boundary wall.
16. There are a number of buildings and structures on the site, the majority of which are proposed to be demolished. This includes the following:
 - The annex to St James' Mill which currently is home to the John Jarrold Printing Museum
 - The remains of the northern boundary printworks wall and the eastern printworks wall.
 - 67-69 Barrack Street which are dwellinghouses
 - 71-75 Barrack Street which are the former RSPCA clinic and kennels
 - The rear extension to no 77-79 Barrack Street
 - The existing garage block
 - Low level walls (1.5m) to the east of the City Wall.
17. It is also proposed to remove a security hut and existing hoardings, a maintenance building which is attached to the city wall remains, the ground floor slab which comprises of remains of the printworks floor and the asphalt associated with the temporary car parking. The remains of the western boundary printworks wall are proposed to be reduced in height.
18. 218 new dwellings are proposed which include 22 dwellinghouses (a mix of 2 and 3 bed properties) and 196 apartments and duplexes (a mix of 1, 2 and 3 bed properties). The two grade II listed cottages which front onto Barrack Street will also be renovated and converted into two 1 bedroom properties. This will bring the total number of residential units on the site to 220. It is proposed that 10% of the properties will be affordable (19 x affordable rent, 3 x shared ownership). Two commercial units will also be provided on the river frontage, one of which is proposed to be a café. A third unit on the river frontage will become a replacement printing museum.

19. The proposed vehicular access to the site will be from Barrack Street via the creation of a new section of Gilders Way (which has already been consented as part of previous consents). This T-junction onto Barrack Street will be to the east of Silver Road. Internal Roads will comprise of Roads A1, A2, A3, B, C and D (see plans). Emergency vehicular access will be provided from Whitefriars via St James Court. A new pedestrian and cycle route will be created adjacent to the City Walls which will link Barrack Street to the Riverside Walk and will be known as River Lane
20. To the east of the City Wall it is proposed that there will be two large blocks of residential apartments (G1/G2 and H) which are proposed to be located north and south of Road A1. To the west of the City Wall it is proposed that the residential dwellings will take the form of a mixture of terraced houses, town houses and apartment blocks with there being commercial floorspace on the river frontage at ground floor level of block E2/E3 (Blocks A, B, C, D, E1, E2, E3 and F). No development is proposed within the south east corner of the site which is classified as Flood Zone 3.
21. It is proposed that there will be an area of open space to the south east of the site and a play area adjacent to the city walls. Car parking will be provided at a rate of around 0.7 spaces per dwelling and cycle storage is proposed in line with current planning policy.

Summary information

Proposal	Key facts
Scale	
Total no. of dwellings	<p>218 new units</p> <p>22 x Dwellinghouses (14 x 2 beds, 8 x 3 beds)</p> <p>196 apartments (72 x 1 beds, 112 x 2 beds, 12 x 3 beds)</p> <p>In addition 77-79 (Grade II listed cottages) will be renovated and will become 2 x 1 bed dwellinghouses.</p> <p>The application also seeks consent for 310sqm of commercial floorspace of which 179 sqm will become a café. Permission is sought for a flexible use for the second unit (131 sqm). A 152 sqm replacement print works museum is also to be provide.</p>
No. of affordable dwellings	<p>Affordable rent</p> <p>16 x 1 bedroom apartments</p> <p>2 x 2 bedroom flats</p> <p>1 x 2 bed duplex</p> <p>Shared ownership</p> <p>3 x 2 bed duplex</p>

Proposal	Key facts
Scale	
Total floorspace (GIA)	Residential – 20,520 sqm Commercial – 453 sqm Internal shared car parking – 1,376 sqm
No. of storeys	Varies from two storeys along Barrack Street stepping up to a maximum height of seven storeys at the east of the site (Blocks G2 and H).
Max. heights	Block A flats – 12.5m, dwellinghouse – 8.1m Block B flats 12.8m, dwellinghouses 6.8m Block C – 11.5m Block D – 17.2m Block E1 – 12.9m Block E2/E3 – 19.7m Block F – 11.4m Block G – 22.5m Block H – 23.2m
Density	126 dwellings per hectare
Appearance	
Materials	Red, red-brown and off-white brick, dark grey rainscreen cladding, eternit slate tiles, render on the listed cottages.
Energy and resource efficiency measures	Fabric first measures including energy-efficient building fabric and insulation to all heat loss floors, walls and roof, high-efficiency double-glazed windows, air-tightness, high efficiency heating systems and low energy lighting. Combined Heat and Power (CHP) will be installed to blocks E2, E3, G1, G2 and H.
Operation	
Opening hours	To be subject to condition
Ancillary plant and equipment	To be subject to condition
Transport matters	
Vehicular access	From Barrack Street via Gilders Way. A number of new internal roads will be created. Emergency access to Whitefriars via St James Court.
No of car parking spaces	162 spaces which includes 1 car club space and 2 visitor spaces.

Proposal	Key facts
Scale	
No of cycle parking spaces	331 spaces within shared stores. Townhouses to have space for 2 x bikes within garage. 18 x visitor spaces
Servicing arrangements	Communal bin storages for flats. Dwellinghouses to have individual bins which will be stored within gardens.

Representations

22. The application as submitted was advertised on site and in the press. Adjacent and neighbouring properties were notified in writing. 261 letters of representation have been received in total for the full and listed applications citing the issues as summarised in the table below. 219 letter of representation related solely to the John Jarrolds Print Museum. A further 22 people commented on the print museum but also raised other issues. All representations are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Issues raised	Response
<p>Print museum</p> <p>The Print Museum is a vital resource for artists and printmakers and is an intrinsic part of Norwich's heritage. It is of national and international importance and the most important privately-owned printing museum in the Country, with a collection second only to those of the Science Museum. It records the history of printing in Norwich which is a key feature of local industry. It is an important asset for the city in terms of heritage and culture.</p> <p>It is the only museum of its kind in the UK. It is unique as it is both a museum containing rare and historic artefacts and at the same time offering a living and working environment full of dedicated professionals.</p> <p>The machines are currently still used to produce contemporary hand produced prints. It is a working museum. It has been used as a film and television location due to its unique collection of presses and knowledgeable operators who are willing to share their skills.</p>	<p>See main issue 3.</p>

Issues raised	Response
<p>Volunteers are preserving knowledge and skills for future generations.</p> <p>People visit the museum from all around the world and students from NUA visit weekly because the museum provides a valuable contribution to their studies. Each year in excess of 100 first year graphic students visit the museum. Being able to see the machinery working and being operated by printers is an invaluable living resource and part of the creative and industrial fabric of Norwich.</p> <p>The proposal does not provide space to accommodate the Jarrolds Print Museum in accordance with policy CC17b. A static display in a café setting, showcasing a few 'key pieces' of printing and bindery equipment does not comply with the policy.</p> <p>The museum must be rehoused and the collection should be kept together in one place and remain open to the public.</p> <p>Why demolish a building which is in keeping with the architectural style of St James Mill in favour of commercial units which would be less aesthetically pleasing? The building is the last remaining building still used for print-related purposes from the days of Jarrold Printing on the Whitefriars site. If demolished, the museum will find it extremely difficult to reinstate itself in another location.</p> <p>Norwich is a UNESCO City of Literature. The loss of the printing museum is at odds with this. Once lost, this nationally important resource cannot be replaced.</p> <p>The museum should be put at the heart of the redevelopment to ensure the continuation of the invaluable work it already does. A housing development could benefit from having a cultural focus and community facility based in the museum.</p> <p>The museum should be receiving more support, rather than facing closure. The developers should cover all costs of the</p>	

Issues raised	Response
relocation of the museum.	
<p>Cottages on Barrack Street</p> <p>The proposal will result in the loss of historic buildings. 67-69 Barrack Street should also be retained. Although the cottages are not listed they are nearly 200 years old. It would be better to retain the whole terrace.</p> <p>The two listed cottages should be preserved for future generations. Further details are needed of these cottages to ensure their preservation.</p>	See main issue 3.
<p>Parking and traffic</p> <p>There is a lack of parking and the proposal will result in traffic congestion. 0.7 parking spaces per unit is not enough and cars will overspill into other areas of the city.</p>	See main issue 6.
<p>Principle of redeveloping the site</p> <p>Support the building of new residential dwellings on this derelict site.</p>	See main issue 1.
<p>Bats</p> <p>In 2014 a bat survey was undertaken along the river which shows a fair amount of bat activity in this area. The bat survey submitted with the application does not take account the surrounding area and river corridor along which the bats fly.</p>	See main issue 10.
<p>New routes</p> <p>Public access along River Lane to the River Wensum is welcomed.</p>	See main issue 2 and 6.
<p>Affordable housing</p> <p>The proposal only provides 4% affordable units rather than the recommended 33%.</p> <p>Viability should be considered at the plan making stage with applicants having to explain why an assessment should be provided at the application stage. NPPF 2 sets out that a minimum of 10% of homes should be available for affordable home</p>	See main issue 12.

Issues raised	Response
<p>ownership and benchmark land values must take account of the policy compliant position.</p> <p>The Existing Use Value (EUV) for the larger proportion of the site is based on commercial usage which would require planning permission. Its existing use is a car park.</p> <p>The EUV for the houses on Barrack Street should not be based on the price they were sold to the current owner.</p>	
<p>Infrastructure</p> <p>It is unclear whether there is the necessary infrastructure for 218 dwellings e.g. shops, nurseries, school provision, medical centres and recreational areas as well as pedestrian and cycling access.</p>	<p>See response from Norfolk County planning applications</p>
<p>Trees</p> <p>There is a magnificent Plane tree near to the terrace of houses which should be protected.</p>	<p>See main issue 4.</p>
<p>Energy</p> <p>Fabric first and district heat network are welcomed but the fabric first measures appear to be a fairly standard list. Why not build to a Passivhaus quality levels? Disappointed that the proposal is only for energy efficient buildings and a gas-fired Combined Heat and Power (CHP) unit. Gas is a fossil fuel. There are better alternatives such as Ground Source Heat Pumps, Water Sources Heat Pumps, Air Source Heat Pumps, photovoltaics and solar thermal panels.</p> <p>The percentage of on-site low carbon/renewable is also unambitious. The Joint Core Strategy level needs to be reviewed. London is now operating a policy of 35% on site renewables.</p>	<p>See main issue 8.</p>

Following revisions to the application (the change of one of the commercial units to a print museum) a two week period of reconsultation took place. All people that had commented on the application were notified of the revisions. 54 letters of representation have been received citing the issues as summarised in the table below.

Issues raised	Response
<p>Print museum</p> <p>Key to the continued existence of the printing museum is the operational aspect, the ability for the place to be a working museum rather than just a static display. The proposed floorspace is less than half that of the existing premises and only 35% of existing equipment and machinery could be housed within the premises. The proposal does not promote a sustainable future as a working museum, will have different objectives to those of the current John Jarrold Printing Museum and will only exhibit equipment that originated from the Jarrold Printing Company. The museum would be broken-up. This does not satisfy policy CC17b which requires <i>the</i> museum to be accommodated within a new development. The proposal makes no provision for the library which is housed within the existing museum.</p> <p>Students will be deprived of valuable resources.</p> <p>The proposal will involve a massive move and storage.</p> <p>The existing print works building is iconic and shouldn't be demolished.</p>	<p>See main issue 3.</p>
<p>Affordable housing</p> <p>Objection still stands as viability assessment as amended does not address concerns.</p>	<p>See main issue 12.</p>
<p>Trees</p> <p>The shrubbery, Acacia and Strawberry tree should be retained.</p>	<p>See main issue 4.</p>
<p>Energy</p> <p>There are insufficient energy saving/Passivhaus units.</p>	<p>See main issue 8</p>

<p>Cottages on Barrack Street</p> <p>The changes to the listed cottages will lead to a loss of historic fabric and cause substantial harm to the heritage asset. Integrating the unlisted cottages would add a layer of character and interest to the scheme.</p>	<p>See main issue 3</p>
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Consultation responses

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

Design and conservation

24. The existing site is largely inaccessible and poorly connected to the surrounding roadway and pedestrian access/cycle ways. The development will improve links and reinstate the historic Water Lane and will provide an attractive landscaped connection. The layout, scale and form of the proposed development to the west of the wall will harmonise with neighbouring context and will knit back into the wider historic townscape. The scale of the riverside block will remain lower than the grade I listed mill. To the east of the wall the buildings are taller but block H is set well back from the river which helps to reduce the visual impact and Block G is set back from Barrack Street. There is some concern with block H and that the height could erode the dominance of the mill as the blocks serve to compete with the mill. This block will also have a harmful impact on views along the riverside.
25. The streets will not be dominated by cars although there are a few spaces which should be omitted (south of block E1), northern end of road C and road D. The proposed street trees are welcomed.
26. St James Mill Annex is of no architectural merit and is identified as a negative building. The John Jarrold Print Museum is a private collection and has been relocated on a number of occasions. The collection is not protected by any listed status. There should be a legal agreement to ensure that the museum is completed prior to the occupation of the first phase of development.
27. In terms of the boundary wall to St James Church, lowering this will not cause harm to the setting of the listed building. A condition should require a structural engineers report to ensure no damage is caused to the listed building.
28. With regards to the listed cottage these benefit from a great deal of historic and social/communal heritage value and significance. The repair and re-use of the buildings is welcome; however there is fear that the proposed works will see the loss of historic form, fabric and special interest. The annotations in the document are vague and the cladding of the external walls in render on board insulation will obscure the historic brick work and patina of age. The replacement of the shopfronts with sliding sashes is conjectural restoration.

English Heritage

29. Broadly content with the scheme. The development would create significant space around the standing and buried sections of the city wall as well as reinstating the historic road beside it. The waterfront development would be of some scale but addresses the river and reflects St James Mill in height. The Listed houses on Barrack Street will be retained and new terraces properties will reflect the scale of the listed building and St James church. Houses facing the city wall are a suitable way of addressing the wall that reflects historic form and scale of building in the area. The proposal will affect views of the cathedral spire but the assessment included within the application suggests that it would still be a significant feature. The centre of the site largely comprises terraces of three storey houses set around broad road. Although these new routes do not reflect the historic subdivision within the site, it does create positive residential spaces of appropriate scale. Development on the eastern part of the site, outside the city wall, relates more to the existing modern office buildings however due to the buildings stepping up they create a sense of openness to the west facing the city wall and the horizontal emphasis could reduce sense of height.
30. The development would not result in harm to the significance of the Scheduled city walls and listed building and by bringing 77-79 Barrack Street back into use and repairing the city walls will enhance these assets. The proposed buildings respond to the historic environment and would not harm the significance of the conservation area. We would therefore support the application.
31. Scheduled Monument consent will be necessary for demolition of the modern building attached to the city wall and for any works to it. It would also be valuable to have interpretation of the city walls in the public area. It would be useful to have future ownership of the city wall clarified and details of how it would be maintained.
32. We have no objection to the demolition of the modern print works building but consider the collection to be of historic interest. We would support the relocation of the collection to a new building.
33. We have noted the supplementary planning document for the John Jarrold Printing Museum retention and relocation strategy. We have nothing to add further to our previous response.

Environmental protection

34. No issues raised.

Environment Agency

35. No objection in terms of land contamination subject to conditions. Part of the site is situated within flood zone 3a. We have no objection to this planning application providing that you have taken into account the flood risk considerations. The application should pass the sequential and exception tests and be supported by a site specific Flood Risk Assessment (FRA). Conditions should be attached requiring development to be carried out in accordance with the FRA dated 14 August 2018 and in particular finished ground floor levels should be set no lower than 3.10m above Ordnance Datum (AOD).

Highways (local)

36. No objection in principle subject to the consideration of the following:
- Semi vertical cycle racks are proposed for bike stores which are really hard to use. A mix of semi vertical and Sheffield stands would be acceptable.
 - Car club – would we get funding for a vehicle or just the space?
 - We would welcome EV charging for all off-street parking bays and shared use public facilities with the on-street bays. As an alternative it would be advisable to ensure that there was electrical supply to the car parks.
 - It is recommended that visitor parking is provided.
 - There needs to be clarity on how parking spaces will be managed/allocated and how parking will be controlled on the site road. As there will not be 1:1 parking provision there needs to be a mechanism to allocate spaces so prospective tenants understand what parking is available to them before occupation.
37. The QD car park is small and Strategic Highway's objection wouldn't stand up to scrutiny at appeal. The shared use cycle path adjacent to the site is not something that would be supported as doesn't form part of pedalways and cycles will go through the site rather than round it.

Highways (strategic)

38. Whilst we have no objection to the principle of the development, however there is a conflict between site entrance and entrance to QD car park. Need to consider moving the entrance either east or west. Application should also provide for an east/west cycle path along Barrack Street.

Housing strategy (on original submission)

39. The development is welcomed and the overall housing mix is in line with the housing need demonstrated within the 2017 update to the SHMA. Policy 4 of the Joint Core Strategy sets out that 33% of dwellings should be affordable with a split of 85% for social rent and 15% for intermediate tenure. It is disappointing that they are only proposing 4% affordable housing and we would welcome further discussions with the applicant to seek to increase this level of provision. The current affordable housing need in this area is for one bedroom flats, two bedroom houses and larger family homes. The most suitable tenure to meet our housing need is social rent. Shared ownership does not meet our identified housing need. The 2017 SHMA did not make a differentiation between social rent and affordable rent but did show that more tenants would be able to afford a social rent without housing benefit than for affordable rent.
40. A blind tenure scheme is preferable and if possible flats should have their own entrance. Dwellings should have access to suitable amenity space and parking provision should be made.
41. A contract should be in place for the transfer of the affordable housing to an RP , prior to occupation of any of the private dwellings and the affordable housing should be completed and transferred to an RP prior to occupation of 75% of the private dwellings. A standard review clause would be needed.

42. We welcome the DV's report that shows an increase from the offered 4.5% affordable housing up to 10% albeit it is disappointing that a city centre location is far below policy requirement levels.
43. NOTE: These comments were offered on the original scheme with the original housing offer.

Landscape and ecology

44. The general approach to landscape and ecology is acceptable as the proposals would have a beneficial effect on the cityscape.
45. Strategic views - The proposed building will mostly obscure the view of Mousehold Heath from Whitefriars Bridge undermining the visual connection between two key natural assets (river and heath). The new buildings would replace views over the site towards the wooded valleyside beyond. It would be preferable if the height of block H could be reduced but this would need to be by at least 2 storeys.
46. Landscape strategy - In terms of the landscape strategy the creation of 2 new north-south public routes and the open space provision along the city wall and on the riverside and improvement of the existing riverside walk is welcomed. At the point where the access road crosses the city wall the paving layout suggests priority for the access road over the city wall route. This should be reversed. There is a good distinction between the areas within and outside the city wall which works well.
47. Riverside walk – clarity is needed on the future status of the riverside walk so it becomes a public right of way.
48. Sustainable Drainage – SuDS should be incorporated.
49. Amenity space – the amount of amenity space is limited with large areas being for parking/highway. More street tree planting would help improve the quality of these spaces. Asphalt should not be used for residential courtyards.
50. Public Open Space – the riverside open space would have car park level undercroft parking (block H) as northern boundary. One type of screen could deaden the frontage. There are opportunities for more public art/landscaping to screen including green walls.
51. Trees – Tree removals are acceptable except for the hornbeams along Barrack Street and the strawberry tree on the river frontage.
52. Soft landscaping – there is a lack of tree planting along the riverside. Proposals for river edge treatment should be included in the landscape strategy as there are opportunities for enhancements. The hornbeam hedge alongside the city wall could be problematic.
53. Hard landscaping – More details of surfacing should be secured by condition. External lighting strategy is needed. The relationship between the site and puppet theatre would be improved if the boundary wall could be lowered.
54. The site includes an existing section of semi-natural riverbank which does not seem to have been assessed but represents relatively valuable habitat. In terms of

protected species the demolitions pose a risk to bats. The recommendations for mitigation (bat survey report 5.2) should be required by condition. Otters are known to be present in the river and should be assessed.

55. There are opportunities for biodiversity enhancements and bird boxes should be incorporated into 30% of the new buildings. There are also opportunities for enhancements to the river.
56. Building 1 and 2 require a full Preliminary Bat Roost Assessment survey.
57. Comments on revised plans – The materials schedule is rather lacking and it would be preferable if the proposal were worked up to a higher level of detail rather than left to a landscape condition. I remain concerned that design opportunities are not being taken to give emphasis to the city wall route. Further consideration needs to be given to the use of materials and proposed planting. It would be helpful to have more detail on play equipment and the riverside walk and courtyard parking areas should be designed to have some amenity function. The strawberry trees should be retained as they have high landscape value.
58. In terms of ecology the updated preliminary ecology appraisal report acknowledges the presence of otters. The proposed mitigation/compensation measures including protection of a Construction Environmental Management Plan are accepted and should be conditioned.

Natural England

59. No comment received

Norfolk county planning applications

60. Schools - There is spare capacity at high school level but there is insufficient capacity within the Early Education sector and at Magdalen gates Primary School to accommodate the children generated by this development and the others in the area (15/01927, 15/01527 and 12/00143). However a new Free School (St Clements Hill Primary Academy) opened in September 2018 and will grow to become a 420 place primary school. The County will monitor pupil numbers and if further expansion is required will put in a claim for funding for additional places if necessary through CIL.
61. Fire – There is a requirement for 1 fire hydrant per 50 dwellings on a minimum 90mm main. The positioning of hydrants to service any taller blocks of flats must meet building regulations. If the overall height of any building exceeds 18m the provision of a dry fire main may be required. This can all be dealt with by condition.
62. Library – No contribution required.
63. Green infrastructure – Connections into the local Green Infrastructure network should be considered. Mitigation for strategic new and existing GI features can be funded by CIL but direct mitigation and GI provision should be included within the proposal. The main priority for this site is to improve the riverside walk in this area. There are some pinchpoints and areas where surfacing needs improvement. The development should create pedestrian connectivity through from Barrack Street with tree planting and greening where possible.

Norfolk county public health

64. There should be adequate provision for secure cycle storage for residents.
65. The noise assessment suggests the need for higher sound insulating glazing in certain blocks. However it suggests the need for mechanical ventilation to avoid the need to open windows. Would this adequately meet the need to ventilate in hot weather?
66. Air quality – no concerns.

Norfolk historic environment service

67. The interim results of the fieldwork provide sufficient information to make an informed planning recommendation. The trial trenching has confirmed that significant heritage assets with archaeological interest of at least medieval and potentially earlier date are present at the site. The nature of the proposed development is such that these heritage assets would be adversely affected by the proposed development. However the nature and scale of this impact could be effectively managed through an appropriate programme of archaeological mitigatory work. This can be dealt with by condition.

Norfolk police (architectural liaison)

68. No comment received

Lead Local Flood Authority

69. There is a lack of information from 3rd party agreement regarding discharge to the River Wensum to Development Management and Construction Phasing Plan not being provided. The FRA (and incorporated SWDS) does not include adequate information regarding infiltration testing and the SuDS hierarchy may not be appropriately applied accordingly. The finished floor levels do not consider surface water flooding risk and safe evacuation of all occupants. Therefore we object to the proposal. If the authority is minded to approve the application a number of conditions have been suggested.

Norfolk Emergency Planning

70. No comments received

Broads Authority

71. No comment

Tree protection officer

72. No objection to the removal of the hornbeam trees as the replacement planting mitigates their loss. Replacement planting should be of a substantial size to reduce risk of vandalism and create an instant landscape impact. More information is required on T1 (tree on Puppet Theatre land) and a supplementary Arboricultural Method Statement will be needed but these can be conditioned along with other conditions relating to compliance with the Tree Protection Plan.

Anglian Water

73. Anglian Water have assets within or close to the development boundary so informative needed. Whitlingham Trowse and sewerage system have available capacity. The preferred method of surface water disposal would be SuDS. Advice needed from the LLFA.

Norwich Society

74. Made on original scheme – no subsequent comments received.
75. Welcome the application to develop this long derelict site and distinct improvements have been made to the massing and design of the project. The plans show a ready appreciation of the character and appearance of the immediate area and its heritage assets. The scheme is however unacceptable in its current form as it does not retain and safeguard the printing museum and although the present home is a utilitarian structure alternative provision could be made for a viable museum in an alternative location. The level of affordable housing and assertions made in the applicant's viability statements should be challenged.

Norwich Historic Churches Trust (Landlord of St James Church which houses Norwich Puppet Theatre

76. Support the application for the development of the site but have concerns that the demolition and construction could cause vibrations and movement within the neighbouring church. Also need to see detailed plan of the new wall to the east of the church and feel that improved landscaping to the churchyard would be of benefit. There is some concern with residential being located so close to the puppet theatre and how performance activities could impact upon residents.

Ancient Monument Society

77. No comments received

Counter Terrorism Security Advisor

78. No comments received

Norfolk Fire Service

79. No comments received

City Wide Services

80. The location and number of bins is satisfactory. There needs to be a dropped kerb at the nearest point from the bin store to the road. There only needs to be one glass bin per compound and an extra space this generates can be utilised to store more communal bins or individual refuse bins. The presentation points for the individual properties are all fine and no dropped kerbs are required for these.

Assessment of planning considerations

Relevant development plan policies

81. **Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS)**
 - JCS1 Addressing climate change and protecting environmental assets
 - JCS2 Promoting good design
 - JCS3 Energy and water
 - JCS4 Housing delivery
 - JCS5 The economy
 - JCS6 Access and transportation
 - JCS7 Supporting communities
 - JCS8 Culture, leisure and entertainment
 - JCS9 Strategy for growth in the Norwich policy area
 - JCS11 Norwich city centre
 - JCS20 Implementation

82. **Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)**
 - DM1 Achieving and delivering sustainable development
 - DM2 Ensuring satisfactory living and working conditions
 - DM3 Delivering high quality design
 - DM5 Planning effectively for flood resilience
 - 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
 - DM15 Safeguarding the city's housing stock
 - DM16 Supporting the needs of business
 - DM17 Supporting small business
 - DM18 Promoting and supporting centres
 - DM19 Encouraging and promoting major office growth
 - DM22 Planning for and safeguarding community facilities
 - DM28 Encouraging sustainable travel
 - DM30 Access and highway safety
 - DM31 Car parking and servicing
 - DM32 Encouraging car free and low car housing
 - DM33 Planning obligations and development viability

83. **Norwich Site Allocations Plan and Site Specific Policies Local Plan adopted December 2014 (SA Plan)**
 - CC17a Barrack Street – Mixed use development
 - CC17b Whitefriars – Mixed Use development

Other material considerations

84. Relevant sections of the National Planning Policy Framework February 2019 (NPPF):

- NPPF2 Achieving sustainable development
- NPPF4 Decision-making
- NPPF5 Delivering a sufficient supply of home
- NPPF6 Building a strong, competitive economy
- NPPF8 Promoting healthy and safe communities
- NPPF9 Promoting sustainable transport
- NPPF11 Making effective use of land
- NPPF12 Achieving well-designed places
- NPPF14 Meeting the challenge of climate change, flooding and coastal change
- NPPF15 Conserving and enhancing the natural environment
- NPPF16 Conserving and enhancing the historic environment

85. Supplementary Planning Documents (SPD)

- Affordable housing SPD adopted March 2015
- Open space & play space SPD adopted October 2015
- Landscape and Trees SPD adopted June 2016
- Heritage Interpretation adopted December 2015

Case Assessment

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

Main issue 1: Principle of development

87. Key policies and NPPF paragraphs – CC17a, CC17b, DM12, DM13, NPPF sections 5, 6 and 11.

88. The application site straddles two allocations in Norwich's Site Allocations and Site Specific Policies local plan 2014: policy CC17a (comprehensive mixed use development including offices and housing) and CC17b (office led mixed use development) and therefore the starting point for the assessment of the proposed development is the site allocation policies. Policies CC17a and CC17b establish the principle of mixed use development of these sites, including a significant element of office development on CC17b in particular. The two site allocation policies are as follows:

Policy CC17a: Barrack Street – Mixed use development

Land at Barrack Street is allocated for a comprehensive mixed use development to include:

- *offices (with ancillary retail uses) and;*
- *housing (in the region of 200 dwellings) together with associated public open space and playspace provision.*
- *Subject to viability, development could also include a hotel as part of the mix.*

The development should:

- *integrate and enhance the cycle link as part of the scheme;*
- *provide access to the river and riverside walk;*
- *respect the setting of the city wall and the adjacent conservation area.*

Policy CC17b: Whitefriars – Mixed Use development

Land at Whitefriars is allocated for office led mixed use development. The development should:

- *provide access to the river and a riverside walk;*
- *respect the setting of the conservation area, neighbouring listed building and the city wall;*
- *Be accessed from St James Court; and*
- *Provide space to accommodate the Jarrolds Print Museum and associated heritage interpretation.*

Loss of an office led mixed use allocation

89. In the right market conditions the site does have the potential to deliver high quality commercial office space in an accessible edge of centre location and as such it is capable in theory of making a contribution to the Joint Core Strategy (JCS) requirement for 100,000 sqm of new office floorspace in the city centre. However the JCS growth strategy (which is the basis for policy DM19) is predicated upon levels of growth set out in the 2007 GVA Grimley Greater Norwich Retail and Town Centre Study which are now considered not likely to be achieved. Updated evidence on employment and retail issues has been produced to support the preparation of the emerging Greater Norwich Local Plan (GNLP): the Employment, Town Centre and Retail Study ('ETCRS', GVA November 2017).
90. Although the 2016-17 Annual Monitoring Report (AMR) comments on limited demand for new office development due to low rental values, this needs to be updated by evidence set out in the ETCRS which suggests a more positive picture for the potential future of office based employment in the city centre. The ETCRS enhanced growth forecast shows an estimated additional demand to 2036 for Greater Norwich as a whole to around 170,000 sq.m of B1a (office) / b (R&D) floorspace which rises to 340,000sqm if windfall losses and churn are taken into account. The GNLP Growth Options report states that a large proportion of this should be allocated in the city centre to help sectors based in the centre to grow, to realise sustainability benefits and to achieve the economic benefits of agglomeration.
91. The study's Strategy Advice report identifies the Norwich urban area's role as the principal focus and driver of the Greater Norwich economy, and a magnet for people from the wider area to work, shop and visit. Norwich city centre's employment offer is changing and the study identifies an increasing 're-urbanisation' of business activity, driven by wider business trends and small business creation within the creative and media sector in particular, back to locations which offer a broader range of services to employees and allow for greater interactions, such as the city centre. It states that, with improvements to rail

connectivity and a growing base of small innovative businesses, the city centre has the opportunity to attract larger, national and international occupiers. There is also likely to be significant demand for good quality multi-let service or flexible offices which could be accommodated within mixed use buildings. The report stresses the need for flexible office space that can allow businesses to grow or contract quickly as required. Residential provision is considered to be an important factor in attracting business to the city centre as 'urban living' becomes more popular, and new mixed use development will therefore be critical to maintaining the diversity of the city centre and to ensure that all needs are met.

92. Therefore, despite market intelligence in recent years suggesting a current lack of demand for large scale offices, a shortage of smaller office suites, and a substantial pool of hard to let, and poor quality office floorspace in the city centre, the ETCRS suggests that there is now growing demand for high quality and flexible office space in the city centre in attractive and accessible locations, with the main city centre growth sectors identified as digital, cultural and creative industries and financial services. Although the report concludes that we have sufficient employment land in Greater Norwich overall, most of this land is out of centre and is neither the preferred location for some growth sectors nor the most sustainable place for office growth.
93. At the same time the city is experiencing a loss of employment floorspace to housing through permitted development rights. Given that the ETCRS identifies an underlying demand for good quality employment space there is a risk of new office / employment development going to out of town locations if there is not sufficient provision in sustainable locations, with serious impacts for the vitality of the city centre.
94. However each application needs to be considered on its own merits and the NPPF sets out that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or building should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Therefore if it can be demonstrated by the applicant through the provision of up-to-date and robust evidence that an office led allocation would not be viable or deliverable, then this would be taken into consideration and should be afforded significant weight in the determination process.
95. The applicant has produced information on the viability of a mixed use scheme with approximately a third of the site being developed for each use (residential, retail and offices). This concludes that a mixed use scheme shows a loss of £902,538 with only the residential element making a profit. With regards to the office element the report concludes that the current rental levels achievable in Norwich for Grade A space of this nature are not significantly high enough to render office development economically viable. The viability assessment assumed two, four storey office buildings, one of 26,600 sq ft and one of 13,300 sq ft with the 26,600 sq ft building being divided into smaller suites and let on short term leases. The report sets out that for good quality refurbished office space in the city centre you would expect rents of circa £16.50 per sq ft and therefore it is not unreasonable to assume a rent of £18 per sq ft for new space. On the basis of two office blocks with a rent of £18.00 per sq ft the appraisal shows a total loss of £1,802,562.

96. The report also concludes that there is sufficient employment land elsewhere in the city centre to accommodate future office demand and there are more suitable sites which better fit the criteria set out by GVA. In particular the application site only takes up part of the Barrack Street policy CC17a allocation and there will remain further scope on the land to the east for a mix of uses, including offices. It should also be noted that within the St James Place development, planning permission is already in place for two headquarters office buildings of 30,000 sq ft and 40,000 sq ft (known as F1 and F2). These buildings have been marketed on a pre-let basis, but have not yet attracted occupiers as the level of rent needed to make the development viable is considerable higher than the current prevailing levels. The information submitted would also suggest that there is currently 36,078 sq ft of office accommodation currently available at St James Place and there is shorter term, flexible office space available in the city's business centres, which includes Regus at Stannard Place and Sackville Place and also at St Georges Works.
97. The applicants have also considered the application site in the context of the Greater Norwich employment, Town Centre and Retail study prepared by GVA. The GVA report mentions in particular the rise of new start-up companies and small business within the creative and digital sectors and it also sets out that there are a number of locations which are well suited to attract such new commercial activity and specifically mentions those with good access to Norwich railway station. The applicants feel that there are more suitable locations to cater for future office demand with for example Rose Lane and Mountergate and the Royal Mail centre being closer to the railway centre and cafes, restaurants and other retail and leisure amenities which GVA refer to as being needed for the start-up companies in the creative and digital sectors to flourish and be more attractive.
98. Overall, although certain elements of the applicant's report are not entirely clear and could be questioned (for example why the viability assessment has been carried out on a basis on a third office, a third retail and a third residential), the information submitted does suggest that the site is very unlikely to be developed for office accommodation in the near future. Furthermore should demand and rental levels increase there are two office blocks that have an extant consent on the wider Jarrolds site that could be delivered and there are a number of vacant units within nearby office blocks that could be occupied.

Provision of residential led development

99. Norwich does not currently have a five year land supply and therefore policies for the supply of housing cannot be considered up to date. The provision of 220 new homes will help contribute significantly to Norwich's five year land supply and the development will provide a mix of house types and sizes in a sustainable location on the edge of the City Centre. It will also provide 10% affordable housing. Furthermore the new commercial floorspace will generate some jobs and a replacement Printing Museum will be provided. The development will therefore have both economic and social benefits and the riverside location should help it be attractive to future residents, consumers, retailers and visitors.
100. Paragraph 120 of the National Planning Policy Framework sets out that planning policies and decisions need to reflect changes in the demand for land and where there is no reasonable prospect of an application coming forward for the use allocated in the plan applications for alternative uses should be supported where the proposed use would contribute to meeting an unmet need for development in

the area. Furthermore Paragraph 118 advises that substantial weight should be given to the value of using suitable brownfield land for homes and to promote and support the development of under-utilised land and buildings. The provision of a total of 220 homes will help contribute towards Norwich's five year housing land supply which is a material consideration and should be afforded significant weight.

101. It is considered unlikely that the site will be developed in accordance with the site allocation due to office accommodation not being viable and due to a surplus of land currently allocated or committed for employment use. Therefore on balance an alternative form of development for residential can be supported.
102. In terms of the principle of the proposed development, policies CC17a and CC17b also list a number of other criteria which a proposed development should satisfy. These are discussed in detail in the following sections of this report but overall it is felt that the proposed development accords with these policy requirements. The development will provide a new vehicular access and a network of pedestrian and cycle routes across the site which will significantly improve permeability. The development will provide an access from Barrack Street to the river and will enhance this section of the riverside walk. The development also includes emergency access and pedestrian and cycle access from St James Court. It is also considered that the proposal respects the setting of the conservation area, neighbouring listed building and the city wall and provides a replacement home for the print museum.

Main issue 2: Design

103. Key policies and NPPF paragraphs – JCS2, DM3, NPPF section 12.
104. The current condition of the site is poor and development has the potential to significantly enhance the quality of the conservation area, the streetscene along Barrack Street and the views from the Riverside Walk. It also has the potential to better reveal the city walls and to enhance the setting of a number of listed buildings. The main issues relating to the design of the proposal are set out below:

Views

105. DM3 requires that the design of new buildings pay careful attention to the need to protect and enhance the significant long views of the major landmarks identified within appendix 8 of the local plan and within the conservation area appraisals. There are three long views identified by appendix 8 of the Norwich Local Plan in which the proposed site would be visible. These are all views towards Norwich Cathedral: view from the top of Mousehold Avenue, view from Mousehold Heath, west of Norwich Prison on Britannia Road and from Ketts Heights. The townscape and visual impact assessment concludes that the effects on these long views towards the Cathedral would be neutral or beneficial and in particular the buildings would replace a surface car park and fill in a gap in the cityscape. This conclusion is agreed with.
106. The development will also have impacts upon views from Silver Road, Whitefriars' Bridge and the Riverside Walk. The most significant impact would be upon the views from Whitefriars' Bridge and from Quayside as the development would lead to the loss of views to the wooded valley-side in the background. In terms of the view from Silver Road, the height of the buildings has been set to stay below the

roofline of the Cathedral and therefore the effect on the views towards the cathedral is limited and the spire remains the dominant element within the views. The proposal would, however, introduce development into the view which means there is a slightly adverse impact although overall it is considered that the impact is relatively minor.

107. The present views towards the Jarrold's site from the Cathedral Close are not particularly good and are marked as negative vistas within the conservation area appraisal. The proposed development should have a beneficial impact upon these views.

Layout

108. The overall design approach responds to the distinction between the areas within and outside of the city walls. It is proposed to have five 'character areas'. Zone 1 which is inside the conservation area and to the west of the wall has a tight urban grain and forms a setting for the listed cottages. There will be a mix of townhouses and flats which are arranged on a tight grid of new streets that reflects the urban fabric that would have preceded the industrial use on the site. The buildings will have pitched roofs and the mix of a locally prevalent red brick with a darker brown and white brick will add variety and help break up the mass of each block whilst also respecting the character of the area. Zone 2 will be the waterfront buildings adjacent to St James' Mill (this is also within the conservation area and to the west of the city wall). The new river front buildings will respond to the height of the mill whilst remaining subservient to it. The use of materials will help create a visual gap from the mill and help break up the mass of the block. Zone 3, which falls outside the conservation area and to the eastern side of the city wall will have larger scale buildings which will be more contemporary in nature and will form a transition between the existing office buildings to the east and the proposed development to the west. There will also be two distinct landscape zones. The area in front of the waterfront building will form a quayside whereas the open space in front of the larger scale building will be soft landscaped.
109. The proposal will also reintroduce a building line along Barrack Street and reintroduce a frontage onto the river. Overall therefore it is considered that the layout of the proposed buildings responds to being both inside and outside of the city wall. The large modern built form outside the conservation area is acceptable and the more granular form inside the city wall is considered appropriate.

Routes through the site

110. The development of the site will open up and enhance a number of important pedestrian links. It will provide for a major new north-south link from the bottom of Silver Road to the river, along the line of the city wall. It will also provide secondary north-south links from Barrack Street to the river at the east and west ends of the site. It will provide east-west links from St James Court through the development site to the remainder of the area to the west and it will provide improved natural surveillance of the existing riverside walk.
111. In terms of vehicular access the main access will be from Barrack Street via Gilders Way which is the 'secondary' access which was approved under application 07/01363/D. A temporary access-point will be created from Barrack Street (at the existing cross-over that served the main doors to the demolished print-works). This

will be used for construction traffic only and on completion will revert to a pedestrian/cycle link only. A minor access way from St James Court is also proposed which will be for emergency vehicles only (plus cycle and pedestrians).

Height and massing

112. It is considered that the proposed development has been carefully and appropriately modelled. As previously discussed there is a clear distinction in the proposed urban grain inside and outside of the city walls and a differentiation of public realm between hard and soft in the context of the wider character of the riverside.
113. The west of the city walls is developed as a series of perimeter blocks defining a grid of relatively narrow streets. On the Barrack Street frontage it is proposed to have two storey terrace properties which relate well to the listed cottages which are to remain and to the puppet theatre. Inside the site the buildings step up to three storeys, then four (with a recessed fifth floor) and five storeys adjacent to the mill which means that the mill remains dominant.
114. The eastern part of the site relates well to the larger scale modern development to the east. Blocks G and H both step up to seven storeys at their highest point but are set back from Barrack Street and the river frontage with extensive areas of green space surrounding the blocks which helps mitigate the impact of the proposed development in views from Whitefriars bridge and the riverside walk.

External appearance and detailing

115. The visualisations and streetscenes submitted with the application suggest a successful piece of architecture will be created across the site. The variation in height, mass, form and materials will add visual interest, break up the mass and help the buildings fit in with their surroundings. There is a good variation across the scheme with some contemporary elements whilst other buildings are more traditional and appearing more as a collection of townhouses.
116. To ensure a high quality design, it will be important that careful consideration is given to materials and the detailing which can help reinstate the sense of place and character of the area. Brick is a dominant material in the locality and it is noted that red brick is prevalent. This scheme proposes red brick but also introduces variety by using two further brick colours, a darker red-brown brick and a contrasting off-white brick. It is also proposed to use a dark grey rainscreen cladding which in particular will help create a visual 'spacer' between the new riverside building and St James Mill. Officers have some reservations regarding the extent of the cladding; the applicant has responded to these by suggesting a number of options for introducing brick on the western elevation. Final details of this elevation and the precise extent of the cladding can be dealt with by condition.
117. The ground floor of a number of buildings is occupied by undercroft parking which has created some design challenges. Inside the city walls, duplexes are used to create a ground floor residential frontage in a number of places and elsewhere, open metalwork screens will maintain security to the parking areas whilst allowing ventilation. It is proposed that the screens will have letters on them to provide heritage interpretation and to link the new development to its history as a print

factory. This approach is considered appropriate and will ensure that there is activity and visual interest at ground floor level.

118. In order to ensure that the proposed development is of high quality, a palette of material samples will be required for approval by condition.

Public Realm

119. The proposed development provides a number of opportunities for public realm enhancements. In particular the new primary north-south connection between Barrack Street and the river, along the line of the city wall, will not only be a cycle/pedestrian route but will also provide a green space which incorporates play areas. A new public open space will also be created on the river. This will be a natural area and will be an extension to the green 'river bank' zone. The riverside area inside the city walls will be developed as an extension of the hard urban quaysides. The existing planting zones on Barrack Street will be retained.
120. The riverside walk would be retained and improved with the proposed scheme. The existing route is situated between the river bank and site hoardings. The proposed development would increase the activity and amenity on the riverside by introducing a riverside café, a commercial unit, the print work museum, public open space and tree planting.

Main issue 3: Heritage

121. Key policies and NPPF paragraphs – DM9, NPPF section 16.
122. There are a number of listed buildings within the vicinity which include 77-79 Barrack Street (part of the development site), St James Mill, Former Church of St James (Puppet Theatre), C12/13 Undercroft at junction of Whitefriars and St James Court and remains of Anchorite House on Whitefriars. Norwich Cathedral is located approximately 330m to the south of the site. The remaining sections of the City Walls and towers are designated as a Scheduled Ancient Monument.
123. The site is situated within Norwich City Centre Conservation Area with the main body of the site falling within the Northern Riverside character area, whilst the row of cottages fronting Barrack Street constitutes a part of the Northern City character area. In its current state the site does not make a positive contribution to the character of the area, while the large mid-20th Century factory building which previously covered the site was identified as a negative building within the Conservation Area Appraisal. As discussed in main issue 2 it is considered that the proposal is of good design. The current emptiness of the site is harmful to the character and appearance of the conservation area and the setting of nearby listed building and it is considered that the proposal will enhance the conservation area.

Demolition

124. As part of the redevelopment a number of demolitions are proposed. This includes the mid-20th Century Annex to St James Mill. This utilitarian structure contains the Jarrolds Printing Museum and is identified as a negative building in the city council's Conservation Area appraisal. Although attached to St James Mill, the applicant has submitted evidence which confirms that the building is not listed as the building which stands today was not in ancillary use to the principal listed building at the date of the listing, in that St James Mill was listed in 1954 yet the

annex was not constructed until approximately 10 years after that date. The building is of little architectural or historic merit and therefore its demolition is considered acceptable subject to its careful removal so as not to harm the engine house which is to be retained.

125. It is also proposed to demolish 67-75 Barrack Street. Although it is regrettable that the two storey nineteenth century buildings are to be demolished it is considered that the replacement with a row of terrace buildings is appropriate. The RSPCA building is not attractive and it would be difficult to retain the buildings either side and achieve such an attractive replacement. A heritage interpretation condition should be attached to any consent to ensure that the buildings are fully recorded prior to demolition and some form of heritage interpretation is provided on site.
126. The mid-twentieth century garage block south east of the listed cottages is also proposed for demolition. It is also proposed to demolish the mid C20th maintenance building which is another utilitarian structure which is attached to the standing remains of the City walls and to demolish the standing remains of the c20th factory buildings (with the exception of the flint-panelled wall facing the former churchyard to the rear of the puppet theatre).

Printworks museum

127. The printing museum was founded in 1982 by Peter Jarrold, the then Chairman of Jarrold and Sons Limited, with a small group of volunteers who were keen to continue their involvement with traditional printing skills. Peter Jarrold dedicated the Printing Museum to his father, John Jarrold, a pioneer and renowned innovator in colour print reproduction techniques. The printing museum is a private collection of artefacts accumulated over the years. The organisation is not affiliated, accredited or registered with any statutory museum service or body and since inception the printing museum has remained financially dependent on the company and has not received any statutory or grant funding.
128. In 2006 the commercial printing business operating on the site ceased but the printing museum continued to provide a base for volunteer members. Today there are 22 volunteer members who regularly support the printing museum. Of these approximately half are former print industry employees, some of whom have in the past worked for Jarrolds. The remaining volunteers are printmakers and artists (several of whom have associations with Norwich University of the Arts). The volunteers gather on a social and voluntary basis for three hours every Wednesday to operate a selection of the machinery kept within the printing museum.
129. The museum is open to the public at restricted times equivalent to 3 hours a week plus pre-arranged group visits. There is no entry cost. The museum does currently include elements of a working museum where volunteer members may operate equipment under the supervision of the active officers who have the skills to operate specialist machines. Due to Health and Safety concerns children under 12 are not allowed in the museum when any demonstrations are being performed.
130. The printing museum has, since 1982, relocated a number of times around the Jarrold owned site and is now in its third position.
131. The museum has approximately 1,000 visitors per annum of which approximately one third of visitors attended on heritage open days but no machines are

demonstrated during these open days. In recent years the longevity of the printing museum has become a concern given the aging profile of the retired volunteers and due to ongoing health and safety obligations.

132. This private collection not only includes artefacts from Jarrolds but also many items that have been donated, some of which do not relate to the type of printing that was carried out by Jarrolds and there is also some duplication within the collection.
133. Jarrolds wish to retain a sustainable printing museum as part of the development; however they feel that it only serves a relatively small number of people with very limited accessibility. This coupled with concerns regarding the operational sustainability of some working elements of the printing museum has led them to consider how best to retain the museum in the future. The application as submitted included a small space within the café for the display of some artefacts but the proposal has since been amended so that one of the commercial units is now dedicated to a museum. This museum will take a different form than the existing; it is proposed to display equipment with explanation and interpretation which will mean it is open to a much wider audience. The printing museum will display and explain the Jarrolds printing heritage with the benefits of the adjacent proposed café which can be open as one larger unit or closed off, if needed, to enable elements of a working printing museum to continue for as long as operationally safe and feasibly possible. The museum will be wheelchair accessible and will have enhanced facilities. Filmed interviews with the former industry employees have been undertaken and they will also be filmed using equipment enabling audio/visual interpretation to form part of the display.
134. A detailed assessment is being carried out of all of the equipment and Hill and Jarrolds have been working in partnership with the existing volunteers and a panel of experts to identify the key items within the collection that will be retained within the new printing museum. The items that are not significant to Jarrolds will be dispersed through rehoming where possible and offering to local active interest groups and national and local museums.
135. It is proposed that the printing museum will be open Monday to Friday at times when the adjacent café facility is open. The exhibition will allow members of the public to navigate through the Jarrolds Printing storey.
136. There has been a significant amount of public opposition to the application, with the majority of objections relating to the loss of the museum and it is understood that many local residents and visitors to Norwich feel that the proposal does not satisfy the requirements of policy CC17b and in particular it will not re-provide a working museum.
137. The museum will be different; however it will have a more secure future within its new home. Currently the council has no control over the museum and Jarrolds could take the decision to close the museum at any time and to dispose of all its contents. As part of this application a new home can be secured. It is acknowledged that the new museum will be significantly smaller than the existing and it will take a different form; however it will be much more accessible to the general public with the opening hours being extended, wheelchair access being provided, children being permitted to enter the museum and people being able to understand the story of Jarrolds Print Works without having to have volunteers explain this to them. The museum has had three different homes during its lifetime

and it is considered that this development provides the opportunity for the John Jarrolds Print museum to have a long term, sustainable future.

77-79 Barrack Street

138. 77-79 Barrack Street are a pair of early 19th Century houses, which date from 1816. They are one-up, one-down terraced houses but have been unsympathetically extended at ground floor level. When they were converted into a fish and chip shop the two properties were also knocked into one and a large amount of the original fabric and features was removed. They are 2 storeys and formed part of a larger run of cottages. The properties are whitewashed red brick on the front and rear elevation and rendered on the exposed gable end. They have a pantiled roof which is red to the rear slope and black-glazed to the front.
139. The properties are in a poor state of repair but they are rare survivors of one-up, one-down cottages and are reported to be the last in Norwich of this type. The buildings modest proportions and historic patina of age, as well as their surviving historic form and fabric contribute to their overall heritage value and significance. These modest properties benefit from aesthetic, historic (illustrative) and social/communal heritage value and significance. The buildings appear to be suffering from structural movement and are in a poor condition as a result of dis-use and neglect. They are on the city's Buildings at Risk Register.
140. Bringing the cottages back into residential use is welcomed and is a benefit of the scheme. It will ensure the building's future and the renovations will mean that the buildings can be removed from the buildings at risk register. The cottages are to be extended at ground floor and first floor level although by having a half width extension at the upper floor level this will help minimise harm and preserve the dual aspect of the original one-room deep cottages. The extensions are considered necessary in order to provide sufficient living accommodation and the necessary modern amenities. The original stairs, cupboard doors and fireplace in no 77 will be retained and refurbished as part of the development but these have been lost in no 79 Barrack Street so suitable replacements will need to be installed.
141. Norwich City Council's design and conservation officer does however have concerns regarding certain elements of the proposal and in particular feels that there is a lack of information and justification in relation to certain works to the cottages. In particular there is concern that external insulation and render will obscure the historic brick work and patina of age and will blur the lines between the original modest form of the building and the extensions to the rear. The Conservation Officer believes that the loss of the two later date shopfronts for one over one sliding sashes represents conjectural restoration, which is contrary to best practice and that the shopfronts contribute to the significance of the building indicative of their evolution.
142. A number of discussions have taken place with the applicants in relation to the listed cottages and in particular in relation to the proposed insulation. The applicant has concerns that not insulating the properties would mean that the EPC energy ratings for the units would dramatically drop by as many as two levels from the accepted standard and would mean the properties would be less desirable for purchasers. The option of internally insulating the properties has also been explored, but this would result in a number of issues including the removal of the original staircase and existing fireplace which in turn could affect the chimney

construction and structural integrity of the roof. Furthermore this would result in the reduction of floorspace which is already very tight and this option has therefore been considered to be unacceptable.

143. It is acknowledged that externally insulating and rendering the cottages will cover up historic brickwork and will therefore cause harm to the character the buildings. Whilst the harm is not considered to be 'substantial' in NPPF terms, it is 'significant' and extremely regrettable and therefore it is necessary to look at ways of mitigating this harm. As the properties are listed, there is flexibility within building regulations where the regulations would unacceptably harm the character and appearance of the building and therefore not insulating the properties could be accepted. The applicant has subsequently agreed to retain brickwork to the frontage of the properties and now only seeks to render the side and rear elevations of the cottages. This will still cause some harm as it will still cover up original brickwork on the rear; however the gable end is already rendered and with a centrally positioned upper floor extension the original form of the properties can largely still be understood.
144. In accordance with section 16 of the National Planning Policy Framework it is necessary to weight up the harm caused to the character and appearance of the properties through insulating the side and rear and extending the properties with the benefits of bringing the units back into use and the wider benefits of redeveloping the site.
145. Bringing the properties back into use as residential dwellings is beneficial and due to the cost of restoring the cottages it is unlikely that they would be brought back into use in isolation and could potentially remain in their current state for many years. Renovating the cottages is going to result in a financial loss to the developer and the cost of doing this is going to be subsidised by the rest of the development. Overall, it is considered that the wider development provides significant public benefit as it will provide 220 homes on a derelict brownfield site within the city centre conservation area and will also bring the cottages back into their optimum viable use. This is a balanced decision however taking everything into account, it is considered that the public benefits of the scheme outweigh the less than substantial harm to the character of the cottages and will ultimately secure their future.
146. The drawings submitted with the application do continue to have annotations that refer to the possible removal and replacement of the roof and floor plates as a thorough invasive structural survey still needs to be undertaken by a structural engineer and a full repairs schedule compiled. It is felt that this can be satisfactorily dealt with by a 'notwithstanding' condition. Furthermore, it is imperative that the Council secures the repair of these special buildings early on in the development process. If the application is approved a phasing condition should be attached and as part of this, it can be agreed when the cottages will be renovated. This is an effective way of making sure that the buildings are not allowed to remain in their dis-used and dilapidated state indefinitely.
147. It is proposed to demolish the buildings next to the listed cottages and in their place it is proposed to have five dwellinghouses. These will be two storeys in height and will be of a traditional style which is considered to be sympathetic and appropriate and will enhance the setting of the listed cottages as it will replicate the scale and rhythm of the original terrace.

St James Church (Puppet theatre)

148. The existing urban area does not contribute positively towards the setting of the puppet theatre and the development will replace a blank mid 20th century factory wall with a row of townshouses. The proposed buildings respect the build line of the listed building and are two storey which ensures that they remain subordinate to the church.
149. The standing remains of the mid-20th Century printworks are proposed to be demolished with the exception of the flint-panelled wall which faces the former churchyard to the rear of the Puppet Theatre. This section of wall forms an attractive backdrop to the churchyard and provides support for a number of remaining gravestones. It is proposed to reduce this wall to approximately 1.6m in height and re-cap. The proposed alteration to this wall are not opposed in principle, however there is a lack of detail in respect of the works that might be needed. A condition should therefore be added to any consent requiring full details of the proposed alterations to this wall and its resulting appearance and a structural statement submitted to detail how the works will be undertaken so as not to cause harm the stability of the neighbouring listed building.

St James Mill

150. It is considered that the proposed building on the riverside (building E) complements the mill in terms of height and scale but remains subservient to it. The elevation has been designed to complement the façade of the mill in terms of materials and fenestration. There would be some changes to the setting of the mill as a result of the proposed development; however there would be no significant harm to the overall character of the setting or its contribution to the significance of the listed building. A condition should be attached to any future permission to ensure that the demolition of St James Annex does not harm the Engine Shed and mill.

City Walls

151. Standing remains of the city wall are present within the development site. The setting of the wall will be significantly enhanced through the proposal and will form a focal point. There will be public access to their full length on both sides, the removal of the intrusive maintenance building, the repair of the wall and the creation of standing off zones between the wall and the new building (6m to the west and 10 metres to the east). It is proposed that the new public route will be known as River Lane, reinstating its historic name. A condition should be attached to any future permission to ensure that the removal of the buildings attached to the city wall, does not have a detrimental impact upon the structural stability and character of the city walls.

Summary

152. Overall it is considered that the proposal will have a beneficial impact upon heritage assets. It will bring back into use the listed cottages, remove buildings which have been identified as being negative within the conservation area, enhance the setting of the city wall remains and develop the site with buildings which respect their setting. The loss of the locally listed cottages is regrettable and proposed external insulation and rendering to the side and rear elevation of the listed cottage will also

result in some harm, however it is considered that the wider benefits and in particular bringing back into beneficial use a city centre site which has been vacant for many years, outweighs the less than substantial harm.

Main issue 4: Trees

153. Key policies and NPPF paragraphs – DM7, NPPF paragraphs 109 and 118.

154. An AIA has been submitted with the application and this assessed 45 individual trees and two groups, some of which are on site and some of which are off site but may be affected by the proposal. The most significant trees to be affected by the proposal are as follows:

- There are several large London plane trees which are growing within the grounds of the adjacent Puppet theatre. Only one of these trees (T1) has an impact on the site. Another large London plane (T17), is located along Barrack Street. Both of these trees are to be retained and should be protected during works.
- There is a line of hornbeam trees on the western portion of the Barrack Street frontage between the Puppet Theatre and the row of cottages (T8 to T15). The trees contribute to the street-scene; however they have grown in a confined space and would cast dense shade onto the proposed residential properties. Norwich's tree officer accepts their loss subject to the replacement of the trees, although Norwich's landscape officer would like to see them retained.
- There are a number of silver birches (T18 to T29) along Barrack Street which are mostly in good condition. Their retention is desirable although the three trees closest to the site are proposed for removal.
- There is a row of mature willows on the river bank in front of St James Mill (T41 to T44). The Willows make a positive contribution to the character of the riverside and should be retained although the root protection area may have implications for works including the demolition of St James Annex.
- Along the river footpath there are several golden false acacias (T38 to T40) and a group of strawberry trees (G2). The false acacias are attractive trees although two are in decline. The strawberry trees currently make an attractive feature and the landscape officer would like to see this tree retained.
- There is a group of mature trees within a raised planter on the eastern portion of the Barrack Street frontage. The group comprises a plane and several silver birches.

155. Overall 18 trees and 1 tree group are proposed to be removed as part of the proposal which includes the removal of category B, C and U trees. The council's landscape officer objects to the loss of the strawberry trees (G2) and the hornbeam trees (T8 to T15) due to their contribution to the streetscape; however the council's tree officer does not object to their loss subject to replacement planting. It is considered that the hornbeam trees will need to be removed so as not to cause amenity issues for future residents and that it would not be possible to retain the strawberry tree and although regrettable, its loss is considered acceptable.

156. The landscaping plans show significant replacement planting which should help soften the development and should contribute towards replacement biomass. A number of conditions should be attached to any future permission to ensure the protection of the trees that are to remain and to ensure the replacement planting takes place. It is considered that bigger tree species should be chosen which have the potential to reach their ultimate height and spread without the need for excessive management.

Main issue 5: Landscaping and open space

157. Key policies and NPPF paragraphs – DM3, DM8, NPPF sections 8, 12 and 15.

158. Developments of 100 dwellings and above are required to provide for informal publicly accessible recreational open space on site as an integral part of the overall design and landscaping of the development. This space should be of an appropriate form and character to allow for meaningful use. The development should also provide play space (of at least 150 sq m in size with a minimum of four different pieces of equipment).

159. A landscape strategy has been submitted with the application and although the precise details have yet to be agreed, this shows that a pleasant and attractive environment will be created for the enjoyment of residents and for visitors. The overall strategy responds to the distinction between the areas within and outside the city wall and will significantly enhance the setting of the city walls. Within the city walls the focus will be on smaller shared courtyards and private gardens with a largely hard landscaped quayside adjacent to the river whereas outside of the wall there is more tree planting and areas of green space.

160. In accordance with policy the proposal will provide a new area of public open space, play provision and green corridors connecting to an enhanced Riverside Walk. The linear play area which is 150m² will consist of largely timber play equipment which will be suitable within the setting of the city wall and at the south the play area opens up into a more informal landscaped space.

161. The council's landscape officer has reviewed the proposal and although he feels that more information is required in terms of the landscaping scheme it is felt that this can be conditioned. Furthermore he has made suggestions in terms of how specific details within the overall landscaping scheme can be improved and again this can be dealt with by condition. Overall, therefore, subject to a condition requiring full landscaping details it is considered that the provision of open space and play equipment is acceptable and the proposed landscaping will soften and enhance the design of the buildings and provide a good level of amenity for future residents of the development.

Main issue 6: Transport

162. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, NPPF section 9.

163. Part of the site is currently in use as a car park with the remainder of the site consisting largely of a concrete slab which formed part of the former Jarrolds print works. The site is currently not permeable and the development of the site will open up and enhance a number of important pedestrian links. It will provide for a major new north-south pedestrian and cycle link from the bottom of Silver Road to the

river, along the line of the city wall as well as secondary north-south links from Barrack Street to the river at the eastern and western ends of the site. It will also provide east-west links from St James Court through the development site to the remainder of the area to the west and will enhance natural surveillance of the existing riverside walk.

164. In terms of vehicular access the main access will be from Barrack Street via Gilders Way which is the 'secondary' access which was approved under application 07/01363/D. A temporary access-point will be created from Barrack Street (at the existing cross-over that served the main doors to the demolished print-works). This will be used for construction traffic only and on completion will revert to a pedestrian/cycle link only. A minor access way from St James Court is also proposed which will be for emergency vehicles only (plus cycle and pedestrians).
165. The site benefits from good levels of non-car accessibility to employment, services and facilities in the city centre and in the locality. The closest bus stops to the site are located at Silver Road and Bishopsgate which provides regular bus access into the city centre and the Jarrolds footbridge offers direct pedestrian and cycle links from the site over the River Wensum to the city centre. This non-car accessibility is reflected in census data, which indicates that 60% of local residents surrounding the site currently travel to work by non-car modes, compared to 33% for Norwich residents overall.
166. The proposal will result in an increase in vehicular movements associated with the development, however the Transport Assessment submitted with the application confirms that the site access arrangements are suitable to accommodate the traffic associated with the new development. The results of the Transport Assessment show that the Barrack Street/Gilders Way priority T- junction currently operates well within capacity during observed AM and PM peak hours and that it will operate within capacity during baseline 2024 AM and PM peak hours with the currently committed development. It is predicted that the maximum flow increases that will occur on Barrack Street east of the Whitefriars roundabout, will be an additional 37 vehicles during the AM peak hour (about one additional vehicle every 97 seconds), and about a 2% impact on baseline flows. This would be imperceptible from the fluctuations inherent in day-to-day traffic flows. Elsewhere, there are negligible impacts on flows as a result of the development. It is therefore considered that the development would generate a minimal impact on highway link flows and the operation of the Barrack Street junctions with Whitefriars and Kett's Hill. The implementation of a Residential Travel Plan would seek to reduce car driver trips by encouraging non-car modes of travel, which would further reduce the vehicular impact of the development.

Residential Travel Plan

167. It is proposed to provide all households with a Residential Sustainable Travel Information Pack upon occupation and provide all sales staff with information on sustainable travel services and infrastructure which can be conveyed to potential future occupiers. This will allow residents to make informed decisions about their travel choices and encourage immediate uptake of sustainable modes. This will include bus and train timetables, details of how to access car share and car club databases, pedestrian and cycle route maps, information regarding the purchasing of bikes, details of local taxi companies, details of local retail outlets that provide home delivery services and contact details for the travel plan coordinator.

Car parking provision

168. The proposed car parking provision is 162 spaces which includes 1 car club space and two visitor spaces. This is around 0.7 spaces per dwelling. This is mostly in under-croft parking areas and rear parking courts. The townhouses in blocks C and F have integral garages. There is some on-street parking. Six parking spaces are provided north of the St James Mill which are allocated for the commercial units.
169. This level of car parking is considered acceptable due to the site's accessible, edge of centre location where walking, cycling and public transport is a realistic alternative to car use. Prospective residents will be made aware of the car parking provision at the time they are considering purchasing a property within the development and this will be an important part of the residential travel plan for the development. Therefore it is considered that the residential car parking provision will accommodate the residential car parking demand, and there would not be displaced car parking onto nearby streets.

Cycle parking

170. With regards to cycle parking, the local plan sets out that 1 bed units should provide 1 space and 2 and 3 bed units should provide 2 spaces per unit and this development provides bike storage at a policy compliant level. Provision will be made for semi-vertical racks in cycle-storage rooms adjacent to each residential core which are both conveniently located and secure. Although this type of rack is not ideal, alternative, easier to use racks would take up more space and significantly reduce provision and therefore the principle of semi vertical racks is considered acceptable. Due to the small size of the gardens, the townhouses on Barrack Street also have a communal cycle store but the three storey townhouses have garages which are of sufficient size for a car and two cycles. There is also some visitor cycle parking across the site in the form of M-type stands.

Bin storage

171. The proposal includes communal bin stores for the flats and individual bins for the dwellinghouses. The location and size of stores is considered acceptable. It is important that there is level access and dropped kerbs to the bin stores and details of the bin stores should form a condition of any future consent. The drag distances have been reviewed by City Wide Services and they are considered acceptable. Refuse vehicles would be able to turn within the site.

Main issue 7: Amenity

172. Key policies and NPPF paragraphs – DM2, DM11, NPPF paragraphs 9 and 17.

Impact upon neighbouring residents

173. The site is situated within a mixed use area with there being residential and commercial to the north of Barrack Street and office accommodation to both the west and east of the site. Norwich's crown and magistrates courts are situated to the south of the River Wensum and directly to the west of the site is the Norwich Puppet Theatre. The wider Jarrold's site also has outline consent for residential development and an extant permission for office accommodation. Consideration has been given to the impact that the proposal will have upon neighbouring residents and occupiers taking into consideration loss of light, overshadowing and

overlooking and due to the distances involved and the height of proposed buildings it is not considered that the proposal will have any significant impact upon any neighbouring resident or occupier. Furthermore it is not considered that the proposal will have any significant impact taking into consideration noise.

Living conditions for future residents

174. The site will provide 220 units of accommodation which range in size from one bedroom to three bedrooms with there being a mix of dwellinghouses and apartments. All units meet the national space standards and 55% of units are M4(2) compliant (accessible and adaptable dwellings), compared to the target set out in the Local plan of 10%.
175. It is considered that the scheme has been well designed so that most properties will benefit from good levels of light and outlook. Concern was raised at the pre-application stage regarding the relationship between the flats within block A and the dwellinghouses within block A and this did result in part of the flats begin reduced in height. Although it is still considered that two of the dwellinghouses will not benefit from good levels of outlook or light from the rear, it is considered that light and outlook will be adequate and therefore it is concluded that the internal living conditions for all future residents of the proposed development will be satisfactory or good.
176. All dwellinghouses will benefit from some form of private external amenity space and a number of the apartments have balconies. All private spaces are small; however they are of sufficient size for the enjoyment of residents particularly taking into consideration this edge of centre location. Furthermore to the east of the city wall it is proposed to have an area of open space and a play area which all residents from the development can use along with members of the public. The site is also in close proximity to a number of areas of open space within the city centre, including the riverside, and is within 1km of Mousehold Heath. Therefore overall it is considered that the proposal provides sufficient external amenity space. A landscaping condition will however be required to ensure the space is of high quality.

Noise

177. Due to the location on the inner ring road the main concern with regards to future living conditions is noise as the site is fronts the A147 Barrack Street, part of the inner ring road, to the north and is close to Whitefriars to the west. A noise impact assessment has been submitted with the application and this indicates that the recommended daytime and night time guideline levels prescribed in BS 8233:2014 will be achieved in habitable rooms across a large proportion of the development site, with windows closed, assuming standard double glazed windows with a sound reduction of 33dB. However, for facades facing on to Barrack Street (blocks A, B and C), enhanced glazing units with a sound reduction value of approximately 44dB will be required to ensure appropriate internal noise levels can be achieved. This could be achieved with enhanced glazing with a specification such as 4mm glass/100mm air gap/ 6mm glass. On Block G1/G2 which is slightly set back from Barrack Street enhanced glazing with a sound reduction value of 39 dB would be suitable.

178. Furthermore, with windows open the internal criteria is expected to be exceeded across the site, therefore a suitable alternative ventilation strategy will be required. With the recommended measures in place the living conditions for future residents should be acceptable and therefore a condition should be attached to any future permission requiring details of the glazing, mechanical ventilation and trickle ventilation.
179. In terms of external noise levels, BS 8233:2014 states that a desirable level for steady continuous noise should not exceed 50 dB with an upper guideline value of 55 dB which should be acceptable in noisier environments. Three separate external amenity areas, a private garden of Block A, a private garden of Block B and communal amenity space behind block H were included in the noise model. The estimated noise levels at these receptors were 55dB, 42dB and 46dB which fall within the upper guideline levels set out in BS 8233:2014.
180. Finally with regards to noise, the final type, quantity and location of plant at the development site are not yet known and therefore a full assessment of the expected rating noise levels cannot be undertaken at this time. Therefore a condition should be attached to any future permission requiring details of plant including a further assessment of noise levels once the final specification and location of the external plant is known.

Noise

181. The site is located within the Central Norwich Air Quality Management Area and therefore an air quality assessment has been submitted with the application. This shows that background NO₂ and PM₁₀ concentrations modelled by Defra are predicted to be well within the relevant annual mean objectives at the application site and therefore air quality is considered to be suitable for residential purposes.
182. Overall the proposed development would not have a significant impact on air quality with the increase in predicted concentration of NO₂ at existing receptors location being negligible. All existing modelled receptor locations remain below the annual mean objective of 40 µg/m³ for the modelled opening year of 2020. The potential for dust during demolition and construction is high but with good site practice the impact could be adequately mitigated and controlled to avoid significant effects. A summary of mitigation measures are provided within the air quality report. A condition should be attached to any future permission requiring a dust management strategy.

Main issue 8: Energy and water

183. Key policies and NPPF paragraphs – JCS3, DM1, NPPF paragraphs 94 and 96.
184. An energy statement has been submitted with the application that sets out the measures planned to achieve energy reductions for the development which includes fabric first and renewable and low-carbon energy technologies. In terms of fabric first these are the measures that are proposed to reduce demand and include energy-efficient building fabric and insulation to all heat loss floors, walls and roof, high-efficiency double-glazed windows throughout, quality of building to achieve airtightness results throughout, high efficiency heating systems and low energy lighting throughout the building

185. In terms of renewable and low carbon energy technologies it is proposed that a Combined Heat and Power (CHP) will be installed to blocks E2, E3, G1, G2 and H. The CHP will be serving 60% and community gas boilers will serve 40% of the demand. Combined Heat and Power comprises of an engine which fires a generator producing on-site electricity. The process also generates heat as a by-product which can then be used to provide space heating and hot water.
186. It is anticipated that the fabric first measures will reduce demand by 12.19% and the low carbon and renewable energy will reduce it by 13.34% which gives a total savings of 25.53%. The report is slightly out of date (i.e. refers to a development for 214 residential units and 2 commercial units) but overall this demonstrates that the development will provide at least 10% of the scheme's expected energy requirements by decentralised and renewable or low-carbon energy and therefore satisfies the requirement of policy 3 of the Joint Core Strategy. Further details of the fabric first measures and CHP can be secured by condition.
187. A condition should also be attached to any future planning permission to ensure that a water standard that is equivalent to Level 4 Code for Sustainable Homes will be achieved.

Main issue 9: Flood risk

188. Key policies and NPPF paragraphs – JCS1, DM5, NPPF paragraphs 100 and 103.
189. At present the site is almost entirely impermeable with only small areas of associated landscaping between parking bays and buildings. The existing peak runoff rates are 143.4l/s for a 1 in 1 year return period and 455.2l/s for a 1 in 100 return period. The majority of the existing site is understood to drain to the River Wensum via a network of public and private sewer networks. Levels across the site vary from approximately 1.8m AOD to 3.0 AOD with levels generally sloping towards the south and south east, towards the River Wensum.
190. The EA indicative flood maps for planning show the majority of the site to be situated in Flood Zone 2 with a minor area in the south east corner of the site being situated in Flood Zone 3. This is in agreement with the EA's general maps, which show the vast majority of the site to be at 'low' risk of fluvial flooding, with very small parts in the south and south east at 'medium' to 'high' risk of fluvial flooding. The site is not impacted by tidal flood risk and the risk from groundwater flooding is considered to be low. In terms of surface water flooding the majority of the site is at low risk of surface water flooding with flood depths being below 300mm on the 0.1% annual probability surface water flood map. However at the northern boundary this increases to up to 900mm.

Sequential and exceptions test

191. The NPPF seeks to direct new development to areas at lower risk of flooding through the Sequential test and sets out that development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The NPPF goes on to set out that the sequential test does not need to be applied for individual developments if the site has been identified in development plans through the sequential test. The site is allocated for development however it is allocated for office led mixed use development and therefore consideration should be given to alternative sites. At this point in time it is

concluded that there are no reasonably available sites within the city centre that could accommodate a development of around 220 homes. Therefore as it is considered that it is not possible to locate this development in an area at lower risk of flooding, the exceptions test needs to be applied. Furthermore it should be noted that although part of the site is within flood zone 3 no buildings will be constructed on this part of the site with this area being proposed as open space.

192. The development will provide houses which will help contribute towards Norwich's five year lands supply and will redevelop a brownfield site within the City Centre. As such it is considered that the development provides wider sustainable benefits to the community that outweigh flood risk.
193. A site-specific flood risk assessment has been submitted with the application to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. The following paragraphs set out the measures to reduce flood risk and to ensure future residents and their properties are safe.

Sustainable Urban Drainage Systems

194. Due to the introduction of soft landscaping, following redevelopment impermeable area within the site is expected to decrease to approximately 1.54 ha. To ensure that flood risk, both within the site and to downstream receptors, does not increase over the lifetime of the development, attenuation of surface water runoff is to be incorporated into the proposed drainage strategy. A review of the suitability of different SuDS options of the site has been undertaken to inform the surface water drainage strategy for the proposal.
195. It is proposed to reuse rainwater on site where possible via roof water collection to use as water for flushing toilets and landscape watering. Due to archaeological remains on site, combined with the poor soil infiltration test results, the applicants consider that infiltration to the ground is not an option for the proposed development and therefore in accordance with the SuDS hierarchy, it is proposed to continue to discharge surface water runoff from the site to the River Wensum albeit at a reduced rate. At present, it is understood that the vast majority of the site currently discharges to the River Wensum via Anglian Water public sewers passing beneath the site. However in accordance with the SuDS hierarchy, to assist in alleviating sewer capacity issues, it is proposed to discharge runoff directly to the River Wensum via a new private outfall.
196. Greenfield runoff rates are 4.6l/s for 1 in 1 year return period and 10.9 l/s in a 1 in 100 year return period. Given the greenfield rates are significantly lower than both the existing and post-development peak rates, attenuating flows to low return period greenfield rates for all storm return periods would result in attenuation storage requirements too large to be accommodated practically and economically on site. It is therefore proposed to restrict runoff to no greater than the existing 1-in-1 year runoff rate of 143.4l/s for all storm return periods up to the 1-in-100 year storm, including a 40% allowance for climate change over the lifetime of the development. This will result in a significant decrease in post development peak surface water flows discharging to the River Wensum. A storage volume of 420m³ has been used in the development of the drainage strategy with the detailed design being proposed to be worked up as a condition. It is proposed to have permeable paving

and granular sub-base storage across areas of car parking and hard landscaping. On this basis there will be no increase in flood risk to downstream receptors following development.

197. It must however be noted that although the Environment Agency have no objection to the proposal, the Lead Local Flood Authority currently objects to the application with one of the reasons being that they feel that the SuDS hierarchy has not been appropriately applied due to incomplete information regarding infiltration testing. Although this objection is noted the Environment Agency have requested that a condition is attached to any future permission requiring that no drainage systems for infiltration of surface water drainage into the ground is permitted other than with written consent from the LPA due to potential risk to the aquifer that underlies the site. Although this does not rule out infiltration it does suggest that there could be some fundamental issues with infiltration and this along with the ground investigations that have been undertaken would indicate that soakage is not a guaranteed option particularly also due to potential archaeology on the site. The applicants have indicated that they are willing to undertake additional percolation tests post approval and that the proposed sub-base storage system would allow for surface water to percolate out of the base, should ground conditions allow for it and therefore it is suggested that this matter can be dealt with post approval via a condition. Furthermore it is considered that various SuDS options have been considered and the reason for discounting certain forms of SuDs are justified. There may be other types of SuDS which slow down the rate of water leaving the site and can clean the water as well, however there are other issues which mean that these would not be suitable on the site. For example green roofs would not be compatible with the design approach taken to the site particular as the design of the scheme to the west of the wall has a tight urban grain, pitched roofs and traditional materials.

Floor levels

198. It is proposed to raise the Finished Floor Levels (FFL) of the proposed buildings within the site to a minimum of 3.10m AOD where residential accommodation is proposed at ground floor level. This will provide a freeboard in excess of 300mm above the design flood level of 2.76m AOD. This will prevent ingress of floodwaters to these buildings for up to the 1-in 100 year event when taking into account the predicted effects of climate change. Where residential accommodation is proposed at first floor level and above only, with commercial floor space and car parking at ground floor level only, it is proposed that FFLs remain in line with existing levels, broadly equivalent to 2.80m AOD. This FFL will be above the 1 in 100 year flood level as parking and commercial space is considered as 'less vulnerable'.
199. The LLFA have also objected to the proposed floor levels although the Environment Agency have confirmed that they have no objection to the application subject to a condition requiring finished floor levels to be set no lower than 3.10m AOD. The LLFA take into consideration surface water flooding and it is noted that there is currently an issue with ponding at the northern boundary of the site and that with current surface water flood levels the proposed floor levels are 50mm less than that which is normally advised. However the applicant has shown that the ponding (and therefore the current surface water levels) are due to a wall which impedes the overland flood flow routes. This wall is to be demolished as part of the proposal and the development will provide significantly enhanced flood flow routes through the development and therefore ponding should no longer occur.

200. It is also proposed to provide flood resilient construction measures for all buildings within the site, up to the extreme 1-in-100- year + 25% climate change flood level. This will include measures such as concrete ground floors, quick drying construction materials, raised electrical sockets, installing plasterboard horizontally for ease of replacement and the use of air brick covers.
201. A Flood Management and Evacuation Plan has been prepared as the site flood hazard rating is classified as 'danger to most' in a 1-in-1000 year event which includes the site being signed up to the Environment Agency's Flood Warning Direct Service which provides an actively disseminated system of flood warnings. This would enable occupants of the site to gain sufficient warning of a flood event for preparation to take place.

Summary on flooding

202. The proposal will provide significant betterment in terms of flooding and surface water and there are constraints to the site (including physical, design and financial constraints) which would rule out a number of other SuDS options. With improved flow paths, it is considered that the development will be safe for its lifetime taking account of the vulnerability of its users, will not increase flood risk elsewhere, and will reduce the flood risk overall. Furthermore Anglian Water have confirmed that the foul sewerage system has available capacity and have accepted in principle the proposed method of surface water disposal. It is considered that all outstanding matters relating to flooding can be dealt with by condition.

Main issue 10: Biodiversity

203. Key policies and NPPF paragraphs – JCS1, DM6, NPPF paragraph 118.
204. A preliminary ecological appraisal report and bat survey report were submitted with the application, which were carried out by suitably qualified ecologist in accordance with best practice. The ecology report was updated as the Council requested that further consideration be given to otters.
205. The site itself contains predominately habitats of negligible ecological value in their own right i.e. hard standing and buildings. There are three statutory designed sites for nature conservation within 1km of the site, one Site of Special Scientific Interest (St James Pit SSSI), one Local Nature Reserve and one County Wildlife Site (Mousehold Heath). The site is also situated 1km from Train Wood which is a County Wildlife Site. There is however no functional links such as hedgerows, waterways, tree lines or any other type of connecting habitat which would allow wildlife from these designated sites to access the development site. The river Wensum is however a key natural asset and sensitive ecological corridor which is also designated as part of the Broads National Park and this is situated just to the south of the site and includes a section of semi-natural riverbank which may represent relatively valuable habitat.
206. As part of the redevelopment a number of demolitions are proposed which pose a risk to bats. The demolition of building 7 would result in the destruction of an occasional roost and the demolition of buildings 1, 2, 4 and 5 will remove potential roost habitat. Therefore replacement roost space in the form of bat boxes should be provided as compensation as part of best practice mitigation which can be conditioned. Furthermore an appropriate mitigation licence would be required from

Natural England and a soft strip of buildings should be undertaken within the bat active season April to October to negate the very low residual risk to bats.

207. A number of species of birds were recorded on the site and therefore a condition should be attached to any future permission setting out that the demolition of buildings should not take place within the bird nesting season unless an inspection is carried out by a suitably qualified ecologist 24/48 hours prior to commencement of works. Trees will be planted across the site which will provide mitigation for the loss of breeding bird habitat. In addition integrated bird boxes should be incorporated into 30% of the units built with suitable target species including sparrow and swift.
208. With regards to otters, an updated Preliminary Ecological Appraisal Report (PEA) has been submitted which acknowledges the presence of this protected species along the River, and the risk of disturbance posed by the development. The proposed mitigation/compensation measures including production of a Construction Environmental Management Plan are accepted and should be conditioned. Pollution prevention guidelines will also need to be followed during the construction period.
209. In terms of mitigation and enhancement a condition should be attached to any future permission requiring further details of these and their implementation which can be delivered as part of a wider landscaping strategy. This should include the provision of bird and bat boxes, the control of external lighting, the creation of natural river edge/marginal habitat along both the engineered and semi-natural bank together with riverside planting to provide canopy linkage.

Main issue 11: Contamination

210. Key policies and NPPF paragraphs – DM11, NPPF paragraphs 120-122.
211. A desk based 'Factual and Interpretative Ground Investigation Report has been submitted as part of this application. It identifies the potential for contamination at the site, in particular lead, certain PAHs, arsenic and mercury. The redevelopment of the site acts as an opportunity to remediate the site.
212. The report recommends that additional soil and groundwater investigations are required which the Environment Agency agrees with. Therefore it is proposed that a number of contamination conditions are attached to any future permission to ensure that the proposal will not pose an unacceptable risk to the environment. It is considered that measures to mitigate contaminants are likely to be achievable.
213. No comments have been received from Norwich's Environmental Protection team; however it is considered that the information required by condition would also ensure that there was no unacceptable risk to public health.

Main issue 12: Affordable housing

214. Key policies and NPPF paragraphs – JCS4, DM33, NPPF paragraph 57.
215. Policy 4 of the Joint Core Strategy has a target for 33% affordable homes to be provided on all schemes of 16 dwellings or more. The policy indicates that this requirement may be reduced and the balance of expected tenures amended where it can be demonstrated that site characteristics, including infrastructure provision

together with the requirement for affordable housing would render the site unviable in prevailing market conditions.

216. Policy DM33 of the DM Policies Plan sets out the Council's approach to securing planning obligations and development viability. It sets out a general principle that planning obligations will be used to secure, amongst other things, the delivery of affordable housing. It also states that policy requirements may be negotiated if scheme viability was demonstrably compromised, and requirements may be reduced by agreement.
217. The NPPF 2019 considers that the use of viability assessments at decision making stage should not generally be necessary, as proposals for development should accord with the relevant policies in an up-to-date development plan. The planning practice guidance states that "[p]olicy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage" (Ref. ID. 10-002-20180724). Paragraph 57 and practice guidance paragraph 10-007 set out circumstances where a decision stage viability assessment may be appropriate and places the emphasis on the applicant to demonstrate whether particular circumstances justify the need for a decision stage viability assessment.
218. The Joint Core Strategy Policy 4 was adopted prior to the publication of the NPPF 2018 and sets a single "target proportion" of affordable housing across the area. The policy advocates adjustments to this requirement where it can be demonstrated that affordable housing requirements along with site characteristics and infrastructure requirements would render the site unviable in prevailing market conditions.
219. The approach taken by policy 4 of the JCS stems from the evidence base for the policy which concluded that a significant proportion of schemes would not be viable at the target level of affordable housing. Therefore decision stage viability assessment is supported by the policy and was advocated during the examination into the plan.
220. JCS policy 4 did not take an approach that "allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage" (planning practice guidance Ref. ID 10-002 20180724) indeed both supported the opposite approach of promoting viability assessment at the decision making stage. For this reason and in the context of the current policy, it is considered that decision stage viability assessments are appropriate in principal in accordance with JCS policy 4.
221. The application as originally submitted included the provision of 10 no. 1 bedroom affordable rent flats which equates to 4.5% affordable units and this was supported by a viability appraisal. This sought to demonstrate that a policy compliant scheme is not viable, that the development can only marginally support a provision of 4.5% affordable housing provision and that the provision of any more than 4.5% affordable housing would make the scheme unviable. This report is available on Norwich City Council's website.

222. As the offer of affordable housing was not at a policy compliant level the District Valuer was instructed by the Council to look at the viability in order to establish whether there was a financial justification for any further affordable housing. The District Valuer has undertaken his own research into both current sales values and current costs and his findings are also available on Norwich City Council's website and is appended to this report. In summary the District Valuer was of the opinion that although the development values and development costs were broadly agreed with there were two areas where there are significant differences between the two assessments. These were Ground Rents and the Benchmark Land Value (BLV).
223. With regards to Benchmark Land Value, the NPPF/NPPG suggest that the BLV should be based on the existing use value, excluding hope value, plus a premium to provide a reasonable incentive for a land owner to bring the land forward for development. In addition an alternative use value may be informative in establishing the BLV but it must have an implementable permission for that use and no premium would then be included.
224. The applicant originally looked at the site on the basis of a commercial site together with the existing uses for residential, commercial and garages for the frontage properties which overall showed a value of £3,410,794. They revised their assessment to consider the site as an overflow car park which gave a total of £4,511,102 (including a reduction of 25% for a single sale). However, the applicant decided to adopt the initial benchmark of £3,410,794 to test viability.
- a) The council considers that it is difficult to value the site as most of it is a concrete slab and there is nothing that the site can be used for without planning permission. Notwithstanding this the District Valuer has based the benchmark value on the following; Frontage properties (67-79 Barrack Street and Garages) – Existing Use Value (EUV) of 67-79 Barrack Street at £1,019,803 plus a premium of 20% and EUV of the garages at £90,000 plus a premium of 20% which gives a total value of £1,330,000.
 - b) Car Park – land to the east of the city wall has a valid use as a car park for 109 spaces. This has been valued on its existing use plus a premium. Taking into account of car parking income from similar car parks, this would suggest a net income of £57,492. Capitalised at 8% and with a 20% uplift this would give a total value of £862,380.
 - c) Remainder of the site – This equates to approx. 2.106 acres and has been assessed on its alternative use as commercial (the allocation for the site is for an office led mixed use development). Savills are of the view that approx. £400,000 per acre is appropriate for a cleared site in this location. The District Valuer is of the opinion that this value is not understated however on the basis that it does not have a planning consent at this stage have deducted 10% for the risk. Overall therefore the value of the remainder of the site is £758,160. This gives a total benchmark land value for the site of approx. £2,950,000.
225. In terms of ground rents, the government announced last year that they would crackdown on unfair leasehold practices in respect of ground rents and they have recently been out for consultation suggesting ground rents are capped at £10 per annum. However since no legislation has been enacted the policy of the District Valuer is to include ground rents at this stage at the current market level. Savills have included ground rents at £10 per annum for all the market units capitalised at

4% but the District Valuer has adopted an average ground rent of £250 per unit per annum but has capitalised at 5% less costs since this is still achievable in the current market. If legislation is however enacted and ground rents were reduced to £10 the scheme with a 10% affordable housing provision would show a deficit of £471,833 (although there would only be a need for an increase of just less than 1% in market values to cover this).

226. It is therefore proposed that a review mechanism is included as part of any future s106 agreement for the development to cover this scenario. This would be in addition to the reviews required by policy in the event that development is not commenced within 12 months of the date of permission and is not occupied within a specified period following commencement. For a scheme of this size, 24 months is considered to be a reasonable period to trigger the 2nd review.
227. The District Valuer has assessed a policy compliant scheme, an all private scheme and what he believes is a viable scheme the results of which are as follows:
- (a) A policy compliant scheme with 147 private units, 73 affordable units (85:15 split), 3 commercial units, CIL of £1,266,097 and a blended profit level of 18.3% shows a deficit of £1,511,253 which is not viable.
 - (b) An all private scheme of 220 units with a CIL of £1,936,168 shows a residual land value of £4,326,973 which is a surplus of approx. £1,376,973 against the benchmark land value of £2,950,000.
 - (c) A scheme with 22 affordable units (10% and 85:15 split), CIL of £1,758,356 and a land value of £2,950,000 shows a surplus of £206,209 which is viable.
228. The council and applicant have not reached agreement on the details of the viability appraisal. Notwithstanding this, the applicant has now agreed a position with the landowner which now means that the applicant is in a position to agree to 10% affordable housing provision with a policy compliant tenure mix of 85:15 rented:shared ownership. This proposed mix accords with the findings in the 2017 update to the SHMA which shows that the affordable housing need in the City is primarily for rented rather than low cost home ownership and also supports the mix set out within JCS 4. The annual need for affordable housing for rent is 240 units (86.78%) whereas the annual need for low cost home ownership is only 37 units (13.43%).
229. On the basis of the applicant's revised offer it is considered that the proposal is acceptable and accords with policy 4 of the Joint Core Strategy as it has been demonstrated that it is not viable to provide 33% affordable units and the applicants have now agreed to provide affordable housing at a level and at a tenure which is judged to be viable by the District Valuer and will meet housing need within Norwich.
230. As per the advice within the affordable housing SPD this would be subject to a review within 12 months if development has not commenced. Furthermore if development has commenced within 12 months of the decision being issued it is suggested that a review is undertaken if there has been no occupation within a further 24 months from commencement. In this instance, and as indicated above, there would be a 3rd review in the event that legislation is introduced to cap ground rents.

Compliance with other relevant development plan policies

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

Requirement	Relevant policy	Compliance
Cycle storage	DM31	Yes subject to condition
Car parking provision	DM31	Yes subject to condition
Refuse Storage/servicing	DM31	Yes subject to condition
Energy efficiency	JCS 1 & 3 DM3	Yes subject to condition
Water efficiency	JCS 1 & 3	Yes subject to condition
Sustainable urban drainage	DM3/5	Yes subject to condition

Other matters

232. The following matters have been assessed and considered satisfactory and in accordance with relevant development plan policies, subject to appropriate conditions and mitigation: List relevant matters.

Archaeology - The interim results of the fieldwork provide sufficient information to make an informed planning recommendation. The trial trenching has confirmed that significant heritage assets with archaeological interest of at least medieval and potentially earlier date are present at the site. The nature of the proposed development is such that these heritage assets would be adversely affected by the proposed development. However the nature and scale of this impact could be effectively managed through an appropriate programme of archaeological mitigatory work. This can be dealt with by condition.

Services - UK power have confirmed that the distribution network will provide sufficient capacity within the context of the provision of a new on-site substation. There is a gas mains on Barrack Street and BT have a distribution network within the adjacent highway.

Equalities and diversity issues

233. There are no significant equality or diversity issues. It is proposed that 55% of homes are M4(2) compliant (accessible and adaptable dwellings), compared to the target set out in the Local plan of 10%. The café and museum will be wheelchair accessible.

S106 Obligations

234. Any approval would need to be subject to a s106 agreement in order to secure affordable housing. It is proposed that the terms of the s106 are as follows:
- 22 x affordable housing units of which 19 are affordable rent and 3 are shared ownership.
235. As per the advice within the affordable housing SPD this would be subject to a review within 12 months if development has not commenced. Furthermore if development has commenced within 12 months of the decision being issued it is suggested that a review is undertaken if there has been no occupation within a further 24 months from commencement. A review mechanism should also be built in if legislation is enacted to cap ground rents.
236. All other matters can be dealt with via condition.

Local finance considerations

237. 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.
238. 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.
239. In this case local finance considerations are not considered to be material to the case.
240. The development would be CIL liable and the level of CIL would be dependent upon the level of affordable housing provision (affordable housing can apply for relief). The district valuer has concluded that a scheme for 10% affordable housing (based on a 85:15 tenure split) would be viable and this would have a CIL contribution of £1,758,356.

Conclusion

241. The site is allocated for office led mixed use development and therefore this application for a predominately residential development is a departure from the local plan. The NPPF sets out that where there is no reasonable prospect of a site being used for the allocated use, applications for alternative uses should be treated on their merits having regards to market signals and the relative need for different land uses to support sustainable local communities.
242. Norwich currently does not have a five year housing land supply and evidence provided by the applicant would suggest that office accommodation would not be viable on the site and that if demand increases there are already two office blocks that have an extant consent on the wider Jarrolds site that could be delivered and a number of vacant office units within nearby office blocks which could be occupied. Therefore on balance it is considered that an alternative form of development for

residential can be supported particularly as this would contribute significantly towards Norwich's five year housing land supply and would redevelop a brownfield site which is currently under-utilised.

243. The proposed development would also provide a number of benefits. The current condition of the site is poor and development has the potential to significantly enhance the quality of the conservation area, the streetscene along Barrack Street and the views of the Riverside Walk. The overall design of the proposal responds to being both inside and outside of the city wall and the development will open up and enhance a number of important pedestrian links. It is considered that the proposed development has been carefully and appropriately modelled with the development to the west of the city wall being based on perimeter blocks and allowing the mill to remain dominant whilst the development to the east relates well to the larger scale modern development to the east. Furthermore the proposed materials help break up the mass and add visual interest. The development also provides a number of opportunities for public realm enhancements and provides a new play area and area of open space which enhance the setting of the city walls. The proposal will provide a replacement printworks museum which although much smaller in scale and will take a different form from the existing museum will ensure that it has a sustained future and will have extended opening areas and be more accessible.
244. In terms of transport, it is considered that an appropriate level of car parking is to be provided and bike storage will be provided at a policy compliant level. The location and size of bin stores is also acceptable. The proposal will have little impact upon any neighbouring residents and will provide good living conditions for future residents of the site, subject to conditions relating to glazing and ventilation in order to protect residents from road traffic noise. The development will provide at least 10% of the scheme's expected energy requirements by low carbon and renewable energy and the proposal will provide significant betterment in terms of flooding and surface water.
245. The scheme will also provide 10% on site affordable housing which is at a level which has been judged to be viable by the District Valuer for the particular form of development proposed and the tenure mix and type of properties will help meet housing need in the city.
246. In relation to the listed building consent application, it is acknowledged that the proposal will bring back into use two listed cottages which are currently on the Building at Risk Register and this is welcomed. The proposed restoration will result in some harm to the listed cottages through the extension of the cottages and the provision of external insulation and render to the side and rear elevation as this will partially obscure the historic brick work and patina of age and will blur the lines between the original modest form of the building and the extensions to the rear. The level of harm is considered to be less than substantial and in accordance with section 16 of the National Planning Policy Framework it is necessary to weight up the harm caused to the character and appearance of the properties with the benefits of bring the units back into use and the wider benefits of redeveloping the site. Overall it is considered that the wider development provides significant public benefit as it provides 220 homes on a derelict brownfield site within the city centre and will also bring the cottages back into their optimum viable use. It is therefore considered that the wider benefits outweigh the less than substantial harm and therefore the recommendation is that both the full planning permission and listed building consent applications area approved.

Recommendation

- (1) To approve application no. **18/01286/F** - Barrack Street Development Site Barrack Street Norwich and grant planning permission subject to the completion of a satisfactory legal agreement to include provision of affordable housing and subject to the following conditions:
 1. Standard time limit
 2. Compliance with approved plans
 3. Details of external materials
 4. Details of glazing and ventilation system for noise attenuation purposes
 5. Details of other plant and machinery
 6. Remediation of contamination
 7. Unexpected contamination
 8. No surface drainage by percolation without prior approval
 9. Details of piling and foundation design
 10. Clean imported topsoil and subsoil
 11. Archaeological written scheme of investigation
 12. Stop work if unidentified archaeological details found
 13. Standards for water efficiency (residential)
 14. Standards for water efficiency (commercial)
 15. Sustainable urban drainage systems – submission and implementation
 16. Details of finished floor levels
 17. Details of flood proofing measures
 18. Flood warning and evacuation plan
 19. Details of external lighting
 20. Fire hydrants
 21. Provision of 10% lifetimes homes/accessible, adaptable dwellings
 22. Phasing details
 23. Submission and implementation of ecological mitigation work in accordance with submitted surveys
 24. No works during bird nesting season
 25. Provision of small mammal access in boundary treatments
 26. No works from November to February in areas where surveys have identified presence of roosting bats
 27. Details of slab levels
 28. Details of heritage interpretation measures
 29. Renewable energy details
 30. Landscaping details including maintenance generally and specifically of city walls
 31. Details and implementation of riverside walk plus access and maintenance arrangements
 32. Provision of cycle parking and bin storage
 33. Details of access and parking and provision thereof
 34. Arrangements for maintenance of new roads
 35. Removal of permitted development rights for residential extensions, curtilage buildings and boundary treatments
 36. Use of museum unit as a museum only and for no other purpose within Class D1
 37. Restricted delivery hours to commercial units in block E2/E3 (not before 0700 or after 1900 Mon-Sat and not at all on Sun and Bank Holidays)
 38. Restricted opening hours on commercial units in block E2/E3 (not between 2359 and 0600 on any day)
 39. Provision and maintenance of play area

40. Details of demolition and construction method statement
41. Submission of full travel plan
42. Works to be carried out in accordance with arboricultural implications assessment, method statement and tree protection plan
43. Supplementary arboricultural method statement submitted before demolition works
44. Programme for recording prior to demolition of St James' Mill Annex and 67-69 Barrack Street
45. Methodology for protection of city walls during demolition and construction
46. Structural engineers report prior to demolition of St James' Mill Annex
47. No demolition of St James' Mill Annex or 67-75 Barrack Street prior to signing contract for redevelopment of whole site
48. Securing provision of replacement print museum
49. Securing works to 77-79 Barrack Street

Informatives:

1. Car free housing
2. Landscape management plan
3. Landscape schedule of maintenance operations
4. Construction working hours
5. Site clearance and wildlife
6. Tree protection barriers
7. Planning obligation
8. Travel plan
9. Street naming and numbering
10. Bins
11. Scheduled Monument consent will be necessary for demolition of the modern building attached to the city wall and for any works to it.

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 and other material considerations, following negotiations with the applicant and subsequent amendments the application has been approved subject to appropriate conditions and for the reasons outlined in the officer report.

- (2) To approve application no. **18/01287/L** - Barrack Street Development Site Barrack Street Norwich and listed building consent subject to the following conditions:
1. Standard time limit
 2. In accordance with approved plans
 3. Access for recording at 77-79 Barrack Street
 4. Requirements for schedule and specification of repairs to 77-79 Barrack Street
 5. Details of joinery, flues etc.
 6. Making good any damage caused
 7. Submission of structural engineers report prior to demolition of 67-75 Barrack Street to show how 77-79 Barrack Street will be protected during demolition
 8. Submission of structural engineers report prior to demolition/alteration of walls facing St James Church

9. No scaffold to be affixed to either 77-79 Barrack Street or the wall facing St James Church without prior approval

Informative notes:

1. Requirement to comply with conditions etc
2. Retention of historic fabric

Reason for approval:

The principle of bringing back into use two listed cottages which are currently on the Building at Risk Register is supported and the proposed residential use is considered to be the optimum viable use for the buildings. The proposed restoration will result in some harm to the listed cottages due to the proposed extension of the cottages and the provision of external insulation and render to the side and rear elevation. This will obscure the historic brick work and patina of age and will blur the lines between the original modest form of the building and the extensions to the rear. The level of harm is considered to be less than substantial and in accordance with paragraph 196 of the National Planning Policy Framework should be weighed up against the benefits of bringing the units back into use and the wider benefits of redeveloping the site. In this instance it is considered that the wider development provides significant public benefits as it will provide 220 homes on a derelict brownfield site within the city centre and will also bring the cottages back into their optimum viable use. Furthermore the alterations to the flint-panelled wall which faces the former churchyard to the rear of St James Church will not result in harm to its setting subject to conditions requiring full details of the works. It is considered therefore that the benefits outweigh the less than substantial harm and therefore the development accords with policy DM9 of the Development Management Policies Plan (2014) and paragraph 196 of the National Planning Policy Framework.