

# Greater Norwich Local Plan: Regulation 18 Consultation

## General Response Form

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the:

- Growth Options document – there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk)

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

### Submitting your Response Form

Responses should be made electronically on the webform which is available at [www.gnlp.org.uk](http://www.gnlp.org.uk) . Alternatively this response form can be downloaded and submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Completed hard copy forms can also be sent to:

*Greater Norwich Local Plan Team*  
PO Box 3466  
Norwich  
NR7 7NX

All submissions should be made on or before **5pm on Thursday 22 March 2018**.

Please note that anonymous submissions cannot be accepted.

<b>Contact Details</b>	
Organisation (where relevant)	'Hill Residential Ltd' and 'Jarrold & Sons'
Address	C/O Agent

<b>Agent Contact Details</b>	
Title	Ms
First Name	Lydia
Last Name	Voyias
Job Title (where relevant)	Associate
Organisation (where relevant)	Savills (UK) Ltd
Address	Unex House 132-134 Hills Road Cambridge
Post Code	CB2 8PA
Telephone Number	01223 347 269
Email Address	<a href="mailto:lvoyias@savills.com">lvoyias@savills.com</a>

**Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.**

<b>Document (please tick as appropriate)</b>		
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Evidence Base	Caravans and Houseboats	<input type="checkbox"/>
	Employment, Town Centres and Retail Study	<input type="checkbox"/>

Evidence Base	Habitats Regulation Assessment (HRA)	<input type="checkbox"/>
	New Settlements Topic Paper	<input type="checkbox"/>
	Strategic Flood Risk Assessment (SFRA) <sup>1</sup>	<input type="checkbox"/>
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

**Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.**

**Introduction/ Background**

Jarrold & Sons owns land south of Barrack Street and north of the River Wensum stretching from Whitefriars on its western boundary to and including the health and fitness club (currently occupied by Nuffield Health) at its eastern boundary.

For over a decade Jarrold & Sons has worked closely with Norwich City Council and other stakeholders in respect of land within its ownership to carefully manage the transition from the former use of the site for printing and publishing to the creation of a mixed-use area providing high quality offices, residential, accommodation and leisure facilities, to contribute to the economic growth of Norwich and the vibrancy of this area of the city.

The remaining undeveloped land within Jarrold & Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.

Jarrold & Sons has worked tirelessly over many years to attract inward investment into this part of city. Completion of buildings between St James Mill and Whitefriars (1 St James Court and Carmelite House) fulfilled Jarrold's first office led investment objective. The next phase of Jarrold's redevelopment strategy required a package of elements to create a unique selling point in order to attract office occupiers to this area of the city. The concept of offices on the river frontage, views to Norwich

<sup>1</sup> Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#)

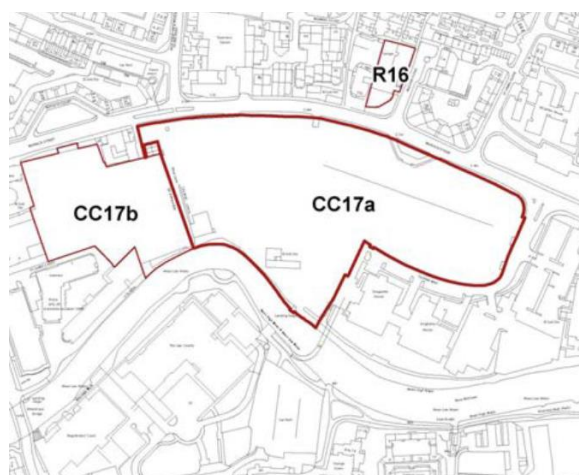
Cathedral, links via a new bridge (the purpose built and forward funded Jarrold Bridge) and car parking all contribute to the unique selling point.

Jarrold's vision for offices on the river frontage and fronting Whitefriars with residential between these offices and Barrack Street has almost been achieved. In recent years the following office developments have been delivered: 1-3 St James' Court; Kingfisher House and Dragonfly, House Gilders Way. The next element of office development to be completed is at land known as Zone F.

Planning permission for 200 new homes, open space and car parking adjacent to the frontage of Barrack Street (LPA reference 15/01927/O) is the start of the residential element with more homes being planned to complement and complete the redevelopment of the area.

### **Current Site Allocation**

The site is covered by two existing allocations within the Norwich City 'Site Allocations and Site Specific Policies Plan' (December 2014) under Policy CC17a: Barrack Street and Policy CC17b: Whitefriars both for mixed used development albeit of different compositions and use class emphasis. The areas covered by the existing allocations are identified on the extract plan below.



These allocations do not reflect the extant planning permissions or the evidence on delivery within the Plan period.

Paragraph 183 of the National Planning Policy Framework (NPPF) states that, "A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

Jarrold & Sons contend that Policy CC17a and Policy CC17b, if simply 'rolled forward' into the Greater Norwich Local Plan would render the Local Plan unsound for failure to satisfy at least three of the above four tests and potentially the fourth.

To resolve these issues of soundness, Jarrold & Sons contend that the allocations should be amended to redefine the boundaries for each allocation and amend the wording to ensure that each meet the tests of soundness.

This representation concerns the following area as identified on the enclosed site location plan referenced: 8436-FM-DR-2001 comprising of:

- The area known as 'Zone F' (subject of planning permission 06/00724/F and reserved matters 08/00538/RM)
- The areas and known as 'Zones A and E' (subject of planning permission 15/01927/O).

### **Proposed Site Allocation Amendments**

It is requested that the emerging Greater Norwich Local Plan continues to recognise this site as a key redevelopment opportunity.

It is requested that this site should continue to benefit from a site allocation which accurately reflects the development proposals in this location.

Specific reference should be made to the following development at 'Land south of Barrack Street and east of Gilders Way' as defined on Policy Area Plan (Zones A, E and F) (drawing reference: 8436-FM-DR-2001).

Land south of Barrack Street and east of Gilders Way' is allocated for:

- c. 8,100 sqm of B1 employment floorspace with 53 associated car parking spaces;
- 200 new homes with 150 car parking spaces;
- 127 car parking spaces for sole use of tenants of the following office accommodation: St James' Mill; 1 St James' Court (Mills & Reeve); 2 St James Court (Carmelite House); 3 St James' Court; Zone F, Dragonfly House and Kingfisher House; and
- Ancillary retail use (approximately 200 sqm).

In addition to the above, Hill Residential Ltd is promoting land to the south of Barrack Street and west of Gilders Way for residential development of 200 new homes with ancillary retail use (A1-A5 use, approximately 350sqm). Please refer to separate representations in respect of this matter.

### **Disclaimer**

Data Protection and Freedom of Information

The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Lydia Voyias

Date 22/ 03/ 2018

## Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 22 March 2018**.

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Or, if it is not possible submit the form electronically,

By post to:

*Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX*

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.gnlp.org.uk](http://www.gnlp.org.uk)

E-mail: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Telephone: 01603 306603