

Mr Mike Burrell
Greater Norwich Development Partnership

16 March 2020

Submitted electronically at: www.gnlp.org.uk/

Ref:1194

Dear Mike,

Greater Norwich Local Plan Regulation 18, Stage C Draft Strategy and Site Allocations – St Mary’s Works (GNLP3054), Norwich City Centre

Background

1. These representations are submitted on behalf of Our Place to the Greater Norwich Local Plan (GNLP) Regulation 18, Stage C Draft Strategy and Site Allocations Process and relate to land at St Mary’s Works, Norwich, which is being promoted for redevelopment by the owner, Our Place (see **Appendix 1** for proposed site allocation boundary).
2. The representations follow an earlier submission by Our Place to the Greater Norwich Development Partnership Board (GNDB) in December 2019 in which Our Place confirmed that the site is available, suitable and deliverable as a mixed-use allocation within the GNLP.
3. Additional comments were provided to highlight the importance for any allocation to be worded such that it is not overly restrictive, thereby ensuring that a viable and deliverable development proposal can come forward in response to the allocation.
4. Our Place is pleased to note that St Mary’s works has been allocated under draft policy GNLP3054 for mixed-use redevelopment within the Regulation 18, Stage C Draft Strategy and Site Allocations Document. This reflects the site’s sustainable location and Our Place’s intentions as both landowner and potential developer to deliver the site within the Plan Period to 2038.
5. That said, the allocation as currently worded, does not contain the level of flexibility that was sought by Our Place in earlier representations, nor does the quantum of uses specified or the Section 106 obligations noted, appear to be effectively justified or supported by robust evidence.
6. As such, whilst these representations offer Our Place’s support to the allocation of the site, they also document their concerns over the wording of the allocation and their recommendations for alternative wording where considered appropriate or necessary. Where relevant to the proposed allocation, Our Place also comment on the wording of the draft Strategic Policies contained within the Regulation 18, Stage C Consultation Document.

Summary of Development Potential

7. The site is located to the north of Norwich City Centre and to the south of the inner ring road. Duke Street lies to the east and Oak Street to the west. The site measures 1.1ha and is held under single ownership. There are a number of existing buildings on site ranging from one to four storeys, that are occupied by a variety of commercial uses including a garage, workshops and a gym. The majority of the site is hard surfaced and is used as a public car park.

8. The site was previously allocated within the Norwich Northern City Centre Area Action Plan for comprehensive mixed-use redevelopment. It is important to say that the AAP has reached the end of its 10-year timeframe and is no longer part of the adopted Local Plan. During the course of its 10-year lifespan, it is understood that there were no comprehensive redevelopment proposals brought forward at the site in accordance with the AAP allocation.
9. The then Policy (SMW1) allocated the site for “mixed use redevelopment” including offices and residential accommodation, with the possible addition of a hotel. It encouraged the conversion of the locally listed St Mary’s Works Factory located on the south western corner of the site (subject to its structural feasibility and the viability of the scheme as a whole) with greatest emphasis given to seeking to retain those structurally stable parts of the building’s frontage onto Oak Street / St Mary’s Plain.
10. The policy prescribed a minimum of 40 dwellings with at least 15% designed as family units. The policy required a new public square and the improvement of the existing churchyards located to the north and south of the site. Pedestrian green links were prescribed, and it was specified that buildings fronting onto St Martin’s Lane and the two historic churches should be lower than those facing Duke Street and St Crispin’s Road.
11. Since the expiry of the AAP, two comprehensive redevelopment proposals have been put forward by the current landowner. Whilst the schemes have generally complied with the intentions of the expired policy, the applicant has, at the time of each submission, needed to extend and alter the mix and quantum of proposed uses beyond those specified in the AAP in order to respond positively and flexibly to local market signals, public feedback, and political priorities.
12. The site is located within the City Centre Conservation Area and its redevelopment is affected by a significant number of locally and statutorily listed buildings on and / or around the site. The presence of these buildings constrain the scale and massing of future development in certain areas of the site. In addition, the need for any redevelopment proposal to provide a positive response to potential below ground archaeology, flood risk and drainage and ground conditions, results in a series of abnormal development costs.

Response to draft Local Plan (Strategy and Draft Allocation)

13. In order to allow future development at the site to respond positively to these constraints and opportunities, there is a need for any strategic planning policies or site allocations to be sufficiently justified and flexible.
14. The National Planning Policy Framework (‘the Framework’), sets out clear guidance on the preparation of Local Plans and is clear at paragraph 16 that plans should: *“be prepared positively, in a way that is aspirational but deliverable.”*
15. In accordance with paragraph 35 of the Framework, there is a need for all aspects (policies and allocations) of Local Plans to be: positively prepared, justified, effective; and consistent with national policy i.e. it enables the delivery of sustainable development.
16. Whilst Our Place concurs with the Council’s conclusion that the site is deliverable, sustainable and suitable for redevelopment in particular residential development (see Our Place’s

assessment of the site's suitability against the GNDB's HELAA criteria in their representations of December 2019), the proposed allocation (as with the draft Plan as a whole) does not appear to be supported by any market or viability evidence to justify the quantum of uses or Section 106 requirements that it specifies.

17. National planning policy guidance is clear in stating that policy requirements of Local Plans should be informed by evidence of need, and a proportionate assessment of viability that takes into account all relevant policies.

Affordable housing and viability

18. With specific reference to affordable housing, it is noted that the Council is yet to publish any viability evidence or any local needs assessment that demonstrates that a 28% affordable housing contribution for the majority of sites across the City Centre as specified under Policy 5, is a deliverable policy objective.
19. Our Place note at paras 240 and 241 of the Regulation 18, Stage C Consultation Draft that the Council suggest that some specific sites which have very high costs associated with development, should be set a lower affordable housing requirement. Despite substantial viability evidence having been put forward as part of both comprehensive redevelopment proposals to demonstrate that a policy compliant affordable housing requirement could not be achieved, the Council has failed to acknowledge this within draft allocation GNLP3054.
20. As such, whilst Our Place are committed to the delivery of much needed affordable housing across a range of tenure types, they object to the imposition of a 28% affordable housing requirement under draft Policy GNLP3054 in the absence of any supporting viability evidence.
21. They are willing to cooperate with the Council and contribute positively to any reviews focusing on viability evidence to enable the delivery of affordable housing should this be requested.
22. Our Place also object to student accommodation schemes being asked (under draft Policy 5) to provide a commuted sum equivalent to the amount of affordable housing that would be expected if the site was developed for general needs housing.
23. Student housing is meeting a particular identified housing need in its own right as evidenced by Norwich City Council's Student Accommodation Need Assessment. Meeting this need assists in freeing up market housing to non-student occupiers, in particular families, thus supplementing local market supply which in itself assists in addressing some local affordability issues.
24. Lastly, the apparent lack of deliverability or viability evidence supporting the content of the Regulation 18, Stage C consultation document raises questions over the appropriateness of the quantum that are specified within its draft allocations (including Draft Policy GNLP3054).

Site specific representations

25. In the absence of the evidence mentioned previously, it is important that Draft Policy GNLP3054 relating to St Mary's Works:
 - a. Acknowledges and provides positive and flexible options for dealing with known environmental and economic constraints;

- b. Advocates a deliverable development scenario that is not so prescriptive so as to constrain future development;
- c. Is justified, based upon up to date local needs assessments whilst being capable of responding positively to changes in market conditions across the lifetime of the Local Plan; and
- d. Promotes the delivery of sustainable development through giving appropriate regard to the need for environmental, social and economic improvements at the site.

In order to meet these objectives and prior to any evidence on the deliverability or viability of the Council's draft Strategic Policies being published, Our Place recommend that the changes shown in the paragraphs below be made to draft Policy GNLP3054 as currently worded.

POLICY GNLP3054

The site at St Mary's Works and St Mary's House (1.05 ha) is allocated for comprehensive mixed-use development to include residential (which may come forward in various forms in response to identified local community needs, not least, build to rent, specialist or accessible housing and student accommodation) and employment uses, with the possible addition of a hotel or other such uses that can be demonstrated through a future planning application to be appropriate for this edge of City Centre site. The site should seek to will deliver a minimum of in the order of 150 homes residential units. Subject to site specific viability evidence, any Class C3 residential uses should comprise including 42 (or 28%) units of affordable housing.

The development should seek to will achieve the following site-specific requirements:

Achievement of a High quality, locally distinctive and energy and water-efficient design of a scale and form which respects its industrial context, the significance of listed buildings (including locally listed) on and off site, and the character and appearance of the City Centre Conservation Area;

Where demonstrated to be viable and feasible, conversion of the locally listed St Mary's Works factory, including and/ or retention of the façade of the locally listed frontage to Oak Street / St Mary's Plain, should be retained as form part of a development scheme;

Respect the setting of St Martin at Oak and St Mary Coslany churches and create enhanced views of the buildings;

Achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the adjacent churchyards along with improved public access;

The scale of buildings fronting onto St Martin's Lane and the two historic churches will be lower than those facing Duke Street and St Crispin's Road;

Pedestrian and cycle access through the area will be created by the design of routes between St Mary's Plain and St Crispin's Road.

Car free or low car housing in accordance with Policy 2 is appropriate for certain uses in this location.



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Conclusion

26. The site owner Our Place, is supportive of Norwich City Council's proposal to allocate the site for a mix of uses, considering it to be a deliverable and suitable site for mixed use development that can come forward within the plan period to 2038.
27. In light of potential fluctuations in market conditions and noting the lack of viability or deliverability evidence supporting the draft plan, they question the justification for the quantum specified within draft allocation GNLP 3054. They respectfully request that the wording be updated to ensure flexibility, such that it promotes and does not constrain the scale, form, mix and timing of the site's future development.

Yours sincerely

Hannah Smith

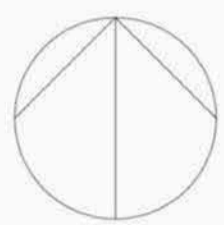
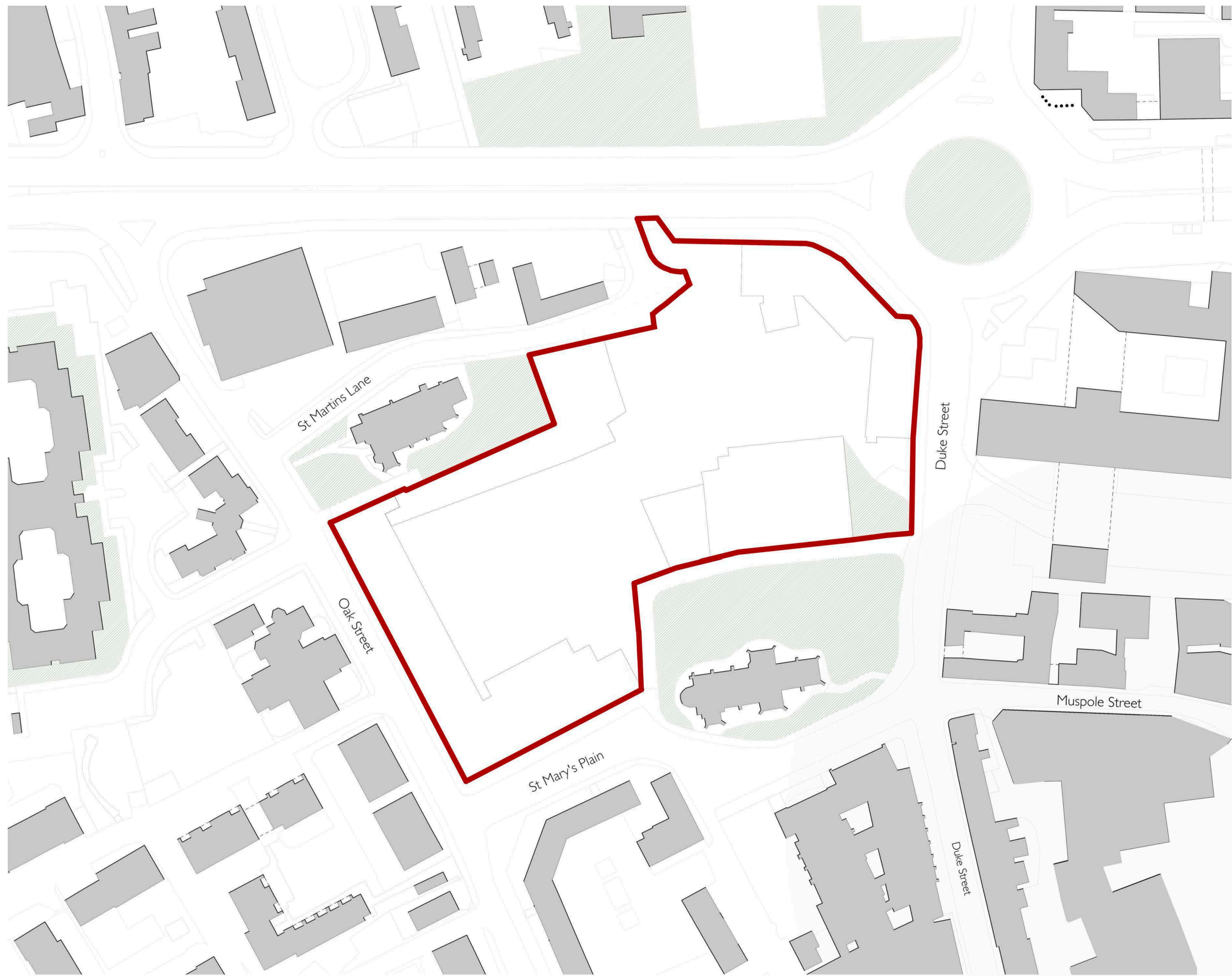
Associate Director

Enc. As above



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Appendix 1 – Site Allocation Boundary



TITLE				
Existing Site Plan SMW				
STATUS				
For Planning				
DATE	SCALE	PROJECT NO.	DRAWING NO.	REVISION
03.02.16	1 : 500	SMW	0002	
	Ⓢ A1			