

16 March 2020



Planning Policy Team  
Planning Services  
City Hall,  
St. Peter's Street,  
Norwich,  
NR2 1NH

Nicola Forster

33 Margaret Street W1G  
OJD T: +44 (0) 20 7499 8644  
F: +44 (0) 20 7495 3773  
savills.com

Dear Sir/Madam

**NELSON HOTEL, NORWICH – PRINCE OF WALES RD, NORWICH NR1 1DX  
REGULATION 18 DRAFT CONSULTATION GREATER NORWICH LOCAL PLAN (GNLP)**

---

Savills is instructed by Whitbread PLC ('the client') to respond to the Draft Greater Norwich Local Plan (GNLP) consultation which has been published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This letter sets out our representation to this plan.

**1.0 Background and Context**

Our client is the owner of the Premier Inn Nelson Hotel on Prince of Wales Road within Norwich City Centre. Premier Inn offer over 800 hotels in the UK and 76,000 rooms in numerous locations. There are also hard and soft landscaping areas that the client has an interest in, and sit adjacent to the hotel.

The Premier Inn Nelson Hotel forms part of a mixed use site allocation identified as Policy CC4b. Whitbread has recently entered into discussions with the Norwich City Council ('the Council') regarding the future redevelopment of this hotel and the surrounding context.

The redevelopment would seek to provide a large scale development with a mix of uses to include Use Class C1 (Hotel), C3 (Residential), C2 (Student Accommodation), C2 (Residential Care Home), B1a (Office), A1 (Retail) and A3 (Restaurants and Cafes).

**2.0 Consultation and Policy**

Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the GNLP, and have recently published the draft GNLP (Regulation 18) for a six week consultation which expires on the 16 March 2020.

Our representation focuses on the Sites Plan part of the GNLP, and specifically Policy CC4b, which has identified the site within a site allocation for large scale mixed use development. We have also made comments on Policy 5 (Homes) and Policy 7.1 (Norwich urban area including the fringe parishes).

For completeness, Policy CC4b and the associated plan is outlined below:

*POLICY CC4b Land Mountergate/Prince of Wales Road (Mountergate East, approx. 2.40 ha) is allocated for mixed-use development. This may accommodate a minimum of 200 homes, to provide affordable housing in accordance with policy 5, subject to viability considerations; together with student accommodation, high quality office space, hotel and tourism uses, and other supporting main town centre uses taking advantage of the site's proximity to the rail station and river.*

- *Development to be approached comprehensively to achieve effective integration of the historic buildings in the central part of the site into the overall development; (Bullet Point 1)*

- Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), student accommodation, educational facilities to support the adjacent Charles Darwin Primary Academy, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening and night-time economy. Night-time economy uses should not dominate the development and should be located to protect the amenity of adjoining residential and commercial occupiers. **(Bullet Point 2)**
- Achievement of a high quality, locally distinctive design of a scale and form which respects its location within the City Centre Conservation Area and adjacent to the St Matthews Conservation Area, conserves and enhances adjoining heritage assets and their settings and contributes to an overall enhancement of townscape quality. **(Bullet Point 3)**
- Development will respect and enhance the setting of on-site historic buildings including St Faiths House and the Weavers House and off-site buildings including the Train Station, Anglican Cathedral and Castle, and be designed as far as possible to reflect historic building plots and street lines and to recreate street frontages, **(Bullet Point 4)**
- Redevelopment, conversion or change of use of Baltic House for uses consistent with this policy will be supported if it becomes available in the plan period; **(Bullet Point 5)**
- A density of development commensurate with its location close to the train station mobility hub with a design that secures a significant overall reduction in the level of off-site surface car parking; **(Bullet Point 6)**
- Provides an enhanced public realm, including public open space and legible and permeable pedestrian/cycle routes to link through the adjoining site CC4a to Rose Lane and the new St Anne's Quarter development to King Street. A link should be provided from Mountergate to the river connecting with Prince of Wales Road via an extended and widened riverside walk; **(Bullet Point 7)**
- Retention and provision of public access to the currently private garden at the rear of the Hotel Nelson; **(Bullet Point 8)**
- High quality green infrastructure, landscaping, planting and biodiversity enhancements particularly along the river edge; **(Bullet Point 9)**
- Protection of bankside access for maintenance purposes. **(Bullet Point 10)**
- Development should ensure a high level of flood resilience and incorporate appropriate mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding). **(Bullet Point 11)**



Figure 1 - Inset taken from Policy CC4b Map

### 3.0 Representation

Our representation below focuses on the detailed site specific requirements of Policy CC4b, and any amendments or clarification that we consider would be beneficial for the soundness of the plan. We have also made comments on Policy 5 (Homes) and Policy 7.1 (Norwich urban area including the fringe parishes) of the Strategy Document.

#### Site Plans (Policy CC4b - Land Mountergate/Prince of Wales Road)

Overall, we welcome and support site allocation Policy CC4b in principle, subject to the following changes being made;

- In terms of Bullet Point 1 within the policy, please amended the wording as follows:

*'Development to be approached comprehensively to achieve effective integration of the historic buildings in the ~~central~~ western part of the site into the overall development'*

The reason for this change to the wording is due to the fact that the historic buildings are located on the western side of the site.

- With regard to Bullet Point 2, we support the land uses mentioned in the allocation, save for the following changes:

The inclusion of Class C2 residential care homes as an additional use and the removal of educational facilities as this reflects the nature of the uses that are more likely to come forward. The wording should therefore be amended as follows:

*'Other uses may be provided as part of a balanced mix including hotel development (replacing or supplementing the existing hotel provision on site), residential care homes home student accommodation, ~~educational facilities to support the adjacent Charles Darwin Primary Academy~~, high quality office space, managed workspace and live-work units, food/drink, small scale retail and uses supporting the evening and night-time economy. Night-time economy uses should not dominate the development and should be located to protect the amenity of adjoining residential and commercial occupiers'*

- In respect of Bullet Point 5, we would like to clarify that Baltic House is not within the clients ownership, however any redevelopment scheme would not prejudice this building coming forward for development conversion or change of use.
- Bullet Point 8 relates to the retention and provision of public access to the currently private garden at the rear of Nelson Hotel. We request that this bullet point should be removed. The reason for this, is that as part of any redevelopment scheme, this open space will be re-provided, and therefore the word 'retention' does not work in this regard. Furthermore, any future open space would not be solely associated as a private garden to the Nelson Hotel. Finally, in respect of the provision of future open space, we consider that Bullet Point 7 covers this requirement.
- We request that an additional Bullet Point (12) should be added to Policy CC4b, to provide for the development of landmark buildings on the site:

Given the size and location of the site, it is considered that the site has potential to accommodate landmark buildings and to deliver a comprehensive high quality mixed use new community.

Strategy Document (Policy 5 – Homes)

Policy 5 relates to affordable housing, space standards, accessible and specialist housing, gypsies and travellers, travelling show people and residential caravans, purpose-built student accommodation and self/custom-build.

This representation only seeks to comment on the sections relating to affordable housing and purpose-built student accommodation (PBSA).

- In respect of the first bullet point for affordable housing, we seek the following amendment to ensure that viability considerations are captured within the Policy.

*“at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing, and subject to viability testing in line with the NPPF”*

- In terms of the PBSA section of the policy, and the last bullet point of this section, we seek the following amendment to take account of sites already allocated for PBSA as part of a mixed use allocation site and to ensure that double counting on affordable housing is avoided. We therefore suggest the following wording:

*Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:*

*“.....make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing, unless the site has already been allocated for purpose built student accommodation or/and where part of the broader development scheme would deliver market housing and associated affordable housing as part of the development. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents”*

Our comments above are made with regard to the delivery of viable development in Paragraph 57 of the NPPF.

Strategy Document (Policy 7.1 - Norwich urban area including the fringe parishes)

Policy 7.1 relates to Norwich urban area and the fringe parishes, and how they will be the areas major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal.

This representation only seeks to comment on the ‘City Centre’ section of the policy and specifically Point 3 (Leisure, culture and entertainment and the visitor economy) and Point 5 (The Natural and Built Environment).

- Point 3 states:

*“Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre’s role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs.”*

Given that the CC4b site allocation has an existing hotel that will be redeveloped as part of a future scheme, and sits in close proximity to a existing and future transport hub at Norwich Station and its surroundings, we welcome and support the above point:

- Point 5 states:

*“New landmark buildings at the gateways to the city centre will be accepted where they are of exceptional quality and help to define or emphasise the significance of the gateway”*

We support the encouragement for gateway developments within the city centre in appropriate locations. It is considered that Policy CC4b site allocation is an appropriate location for a landmark building due its strategic location within the City Centre and its proximity to Norwich Train Station. This approach is in line with the principle so the NPPF and the National Design Guide in promoting the effective use of land, high quality design and emphasising important places.

#### **4.0 Summary Conclusion**

I trust my letter is clear and helpful, and that the Inspector will take full and proper account of our client’s request and clear objectives. In the meantime, if the Inspector or Programme Officer have any immediate queries, please contact me or my colleague, Edward James.

We reserve the right to supplement or amend these comments in the future.

We would appreciate being kept closely informed of the progress of the GNLP.

Yours faithfully,

**Nicola Forster**  
**Director**