

## **GNLP – REGULATION 18(C) CONSULTATION RESPONSE POLICY GNLP0401 – DUKE’S WHARF**

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On behalf of Highcourt Developments Ltd, we support the proposed allocation of site GNLP0401 for mixed use redevelopment. The site is identified as being capable of accommodating a minimum of 100 (or at least 250 bedrooms if student accommodation is proposed). The draft Policy advises that a range of uses, including employment, leisure and education will, in principle, be permitted on the site in order to ensure a balanced mix of uses is provided on site.

In accordance with the National Planning Policy Framework’s (NPPF) definition of ‘deliverable’, the site represents a suitable location for development now, is available immediately, is achievable with a realistic prospect of housing being delivered on the site, and is viable. This is considered in further detail below.

### **Assessment of Delivery**

#### ***Suitable***

The site is located within Norwich City Centre, and is consequently a highly sustainable location for residential development, with easy access to a full range of services and facilities. Norwich and the Norwich Fringe are identified as the location to accommodate 69% of the housing growth during the period to 2038 on the basis that is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable growth.

#### ***Density and Quantum of Development***

The preferred allocation identifies the site as being suitable to accommodate a minimum of 100 homes (or 250 bedrooms if student accommodation is proposed). However, the City Centre location lends itself to high-density urban living, and the site is considered suitable for a significantly higher quantum of development, up to approximately tbc units or TBC student units, as part of a mixed use redevelopment, which would also include other appropriate city centre uses at ground floor level.

The consented schemes retain the principal office building, but it is considered that comprehensive redevelopment of the site, including demolition of the main building, which is envisaged in the current allocation, could enable the delivery of a higher quantum of residential units and/or student accommodation as well as delivering wider public benefits.

The quantum of development that can potentially be accommodated on the site is demonstrated by planning permissions which have previously been granted on the site. More specifically, Planning Permission Ref: 08/00743/F granted consent for an office led comprehensive redevelopment that comprised approximately 17,500 sq m of floorspace. In addition, Planning Permission Ref: 14/01103/F and 15/00916/F granted consent for a total of 154 residential units by, in part, retaining existing buildings on the site.

Furthermore, pre application discussions are currently being held with Norwich City Council in relation to the redevelopment of the site to provide approximately 500 student beds, 175 co-living units (sui-generis), a hotel and education / office use. The proposals are within the parameters of development granted by Planning Permission Ref: 08/00743/F.

Accordingly, in order to ensure the efficient use of land in a highly sustainable location and that the opportunities afforded by the site are maximised the quantum of development identified in the policy should be increased. This would help ensure that the need for both residential accommodation and student accommodation, which is identified in the draft Greater Norwich Local Plan, can be met. This is particularly relevant given the doubt regarding delivery on certain sites within Norwich, notably Carrow Works.

### Uses

The range of uses detailed in the policy provides flexibility to enable any proposed redevelopment to respond to changing market demand that may occur during the plan period and, accordingly, is fully supported.

### Policy Changes

Whilst there is, as detailed above, general support for the proposed development, a number of minor alterations are proposed to the wording of draft Policy GNLP0401.

- Whilst the principle of securing a high quality design is supported, clarification is required as to what is envisaged by energy and water-efficient design. If the requirements are the same as those required by Policy 2 (Sustainable Communities) the reference should be removed in order to avoid duplication of policies. It is not a requirement that has been repeated in other site specific policies. If the requirements are greater than those detailed in Policy 2 (Sustainable Communities), the policy needs to make it clear that they are subject to feasibility and viability, so as to no undermine the deliverability of the site.
- As per the existing site allocation (Policy 21), rather than state that any proposal should 'seek to retain and secure the beneficial regeneration and reuse of existing riverside buildings', the policy should state that 'development may include either the conversion of existing buildings or redevelopment'. This approach provides flexibility and reflects the potential complexities relating to the comprehensive redevelopment of a city centre site and that the reuse of buildings may not be practical or feasible.
- The principle of providing permeability across the site is supported. However, the requirement of a riverside walk should the existing buildings be demolished is considered unnecessary. The principle of permeability can be achieved without the provision of a riverside walk and given there is no riverside walk to the west or east of the site, the walk is considered unnecessary, given that it would cover a small area and, therefore, serve little function.

On this basis, the following changes are proposed to draft Policy GNLP0401:

#### **POLICY GNLP0401**

**Former Eastern Electricity Headquarters, (Duke's Wharf) Duke Street (approx. 0.83ha) is allocated for mixed-use development which may include a minimum of 400 155 homes, (or, if the residential element is provided as student accommodation, at least 250 400 bedrooms). Affordable Housing provision should be in line with Policy 5, subject to viability. Employment, managed workspace, leisure, financial and professional services, education and cultural uses will also be acceptable as part of a balanced mix.**

The development 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 riverside context and prominent location within the City Centre Conservation Area, maintains and/or recreates strong built frontages to Westwick Street, Duke Street and the River Wensum, protects and enhances adjoining heritage assets and their settings, ensures a high level of flood resilience and incorporates appropriate flood mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding);
- Decommissioning and removal of the existing surface car parking;

- ~~Seek to retain and secure the beneficial regeneration and reuse of existing riverside buildings, subject to viability;~~
  - **Development may include either the conversion of existing buildings or redevelopment**
    - Provision of pedestrian links from Westwick Street to Duke Street and Dukes Palace Bridge ~~and a riverside walk along the northern boundary of the site (if the existing river edge buildings are not retained);~~
  - Inclusion of low-car or car-free housing, in accordance with policy 2, where consistent with scheme viability;
  - High quality landscaping, planting and biodiversity enhancements;
  - Heritage interpretation measures to be incorporated in accordance with Policy 3 of this plan.
- Strikethrough = Delete

**Red Text** = Replacement Text

### ***Available***

The site is within the ownership of a single landowner, who is committed to bringing forward a viable redevelopment of the site.

### ***Achievable***

It is considered that residential or student led redevelopment of the site within the first five years of the Greater Norwich Local Plan is entirely achievable. There are no known constraints to delivery of the site in terms of infrastructure requirements etc, and as detailed below, residential-led redevelopment comprising approximately 155 units or 400 student units is considered viable at this stage.

The landowner is committed to the delivery of the site.

### ***Viable***

We are confident that the delivery of the site is viable having regard to the policy requirements of the draft GNLP and there are no factors that we are aware of, at this moment in time, that could prevent the delivery of the site. This statement is, however, made in the context of the questions that have been raised in relation to the ongoing preparation of the Greater Norwich Local Plan and the forthcoming review of CIL. Further discussions are required with the GNLP Team on these matters in order to confirm that the various policy objectives, such as affordable housing and community infrastructure, can be delivered on site without prejudicing the viability of the site.

### **Summary**

As outlined above, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the Greater Norwich Local Plan period. On this basis, the site's proposed allocation for mixed use development is fully supported.

Economically, the site represents the right land in the right place at the right time for development. Residential development or student accommodation in this location would help support the planned long-term economic growth of the Greater Norwich Area, offering high quality and desirable city-centre accommodation within easy reach of key employment areas. Alternatively, a mixed used development including high-quality student accommodation would assist in attracting high calibre students to the City's tertiary education institutions, which in turn would help support the planned economic growth.

Socially, development of the site would assist in the creation of a high quality built environment, offering accommodation in an established community with highly accessible local services. A mix of dwelling types and tenures could be provided to meet local needs, or alternatively the site could be developed to provide high-quality student accommodation, for which there is a need.

Environmentally, redevelopment of the site would bring significant improvements to this vacant site. Not only would it significantly enhance the appearance of the area, it would also offer opportunities to enhance the biodiversity value of the site, and, potentially, improve public access to the River Wensum. In addition, the site is located close to a wide range of services and facilities, and residents would be able to meet their day-to-day needs easily and without the need to use their car, assisting in reducing pollution and minimising the contribution to climate change.