

GREATER NORWICH LOCAL PLAN – REGULATION 19

NORWICH – POLICY CC16

Bidwells continue to strongly support the allocation of land adjoining Norwich City Football Club for mixed use development. The site is entirely deliverable, and capable of making a significant contribution towards the need for additional leisure, community, residential, retail and office uses in the Greater Norwich Area during the period to 2038. The site occupies a highly sustainable location within Norwich City Centre due to its proximity to a range of services and amenities and sustainable modes of transport, notably Norwich Railway Station

The site has, and continues to, make a significant contribution towards housing delivery in the Greater Norwich area. As detailed in the draft policy's supporting text, the Carrow Quay and Carrow View developments which will provide a total of 323 units, are being implemented by Broadland Housing, with some units already occupied. These developments have already delivered a number of the objectives of the Policy CC16.

The wider allocation has the potential to be developed to provide a range of uses, which as well as residential could include a multi-purpose Arena, that could be used for, amongst other things, sport, music and conferencing; helping to achieve a sustainable mixed use development.

Changes Sought

However, whilst the allocation of land adjoining Norwich City Football Club is generally considered sound based on the tests of soundness set out in paragraph 35 of the NPPF, minor alterations to the wording of Policy GNLP0520 are considered necessary.

The policy states that a minimum of 270 homes will be accommodated on the site. However, it is not clear as to whether this figure includes committed developments that are being constructed, or specifically refers to new homes. In our view, it should be the latter.

The only parts of the allocation that are not in the process of being developed are surface car parks, which paragraph 2.192 recognises is an inefficient use of the site. Accordingly, the policy's supporting text should make it clear that these areas will be the focus of the proposed mixed-use development, including high density housing.

Initial design work has demonstrated that the surface car parking areas have the capacity to accommodate 200 units, having regard to various site opportunities and constraints. Accordingly, to ensure that the development potential of the site is maximised through the efficient use of land, the policy should state that the site will accommodate at approximately 200 homes. This approach and the one detailed in the preceding policy will ensure that the policy is justified, consistent with national policy and, therefore, sound.

In addition, the policy should be reviewed to outline which aspects have already been already and, therefore, are not relevant to the remaining undeveloped part of the site. For example, the developments under construction have enhanced the river frontage; improvements which cannot be delivered by the development of the surface car parkd.

The site has the potential to help facilitate the regeneration of the East Norwich area by ensuring that any development on the site does not prejudice the ability to ensure future connectivity, most notably through pedestrian and public transport links, in the future. However, whilst future connectivity with the East Norwich area is a key objective, the development of the site, which may be developed in phases, is not dependent on the regeneration of the wider area, as is demonstrated by the above referenced developments; a fact that should be specifically mentioned in either the policy or supporting text in order to provide certainty. Failure to do this will potentially result in the policy being unsound on the basis it does not provide an appropriate strategy.

As drafted, the policy requires that any development provides a public transport interchange on site, together with a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, the site occupies a highly sustainable location and significant improvements have been made to public transport accessibility in recent years, principally the inclusion of a bus stop on Canary Fields and a bus gate between Geoffrey Watling Way and Koblenz Avenue. Accordingly, whilst it is acknowledged that any development will need to demonstrate how it will connect and be accessible by public transport, the requirement to provide a public transport interchange is not justified and is considered unnecessary. No information has been required on what is required to deliver a public transport interchange on the site. Therefore, it has not been possible to assess the implications for the viability of any development on the site of this requirement.

The policy also states that any proposal will be required to provide a public transport strategy for the wider east Norwich strategic regeneration area. As detailed above, whilst the redevelopment of the Norwich East area is supported, its delivery is completely independent from the development of the land covered by Policy CC16. In addition, given the strategic nature of the Norwich East area, the public transport improvements for this area are likely to be significantly greater than those required on land immediately to the east of Norwich City Football Club. Therefore, whilst it is recognised that any proposal must demonstrate how it would facilitate future links with the wider Norwich East area, the requirement to provide a public transport strategy for the wider Norwich East areas as part of the development of Policy CC16 would be both unreasonable and disproportionate.

Accordingly, it is proposed that in order to ensure the proposed policy is justified and, therefore, sound that reference to both a public transport interchange on site and a public transport strategy for the wider Norwich East area is removed.

Revised Policy Wording

POLICY CC16 Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way, Norwich (approx. 2.23ha) is allocated for mixed use development to include residential, leisure, community, office and ancillary small retail uses. This will accommodate a minimum of ~~270~~ 200 homes.

The development will achieve the following site-specific requirements:

1. Achievement of a high quality, locally distinctive design of a scale and form which respects its riverside context, ensures a high level of flood resilience and incorporates appropriate mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding);
2. Conserve and enhance the setting of the adjacent Bracondale Conservation Area and nearby statutory listed buildings and scheduled monuments (including Carrow Priory & Boom Towers) (including any contribution made to their significance by setting)

3. ~~Provide a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area~~ *Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area.*
4. Provide public access to the river and a riverside walk/cycle link to facilitate the re-routing of national cycle route 1 / red pedalway to Whitlingham and connections to the regeneration opportunity sites to the south and east including the Deal Ground, the Utilities site and Carrow Works in accordance with policy 7.1 and the 'River Wensum Strategy'.
5. ~~Enhance the river frontage as a gateway to Norwich city centre~~
6. Be designed to mitigate the impact of noise generation, light and odour pollution from adjacent industrial uses and the railway
7. High quality green infrastructure, landscaping, planting and biodiversity enhancements particularly along the river edge and forming a setting for the stadium;
8. Norfolk Minerals and Waste Core Strategy Policy CS16 and NPPF 'agent of change' principle applies, as part of this site is within the consultation area of a safeguarded mineral infrastructure (aggregate and roadstone railhead and asphalt plant).

Strikethrough = deleted text

Red = revised wording.