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Date: 22 March 2021

Greater Norwich Local Plan Team
County Hall
Martineau Lane
Norwich
NR1 2DH

Dear Sir/Madam,

Regulation 19 Publication Consultation: Greater Norwich Local Plan: Policy GNLP2114 Land at and adjoining St Georges Works, Muspole Street

I refer to the above site and the draft allocation proposed in the latest iteration of the Greater Norwich Local Plan (GNLP).

The continued allocation of this site for redevelopment is welcomed by the site owner. We can confirm that the site is available for redevelopment and could be brought forward within the next five years.

The policy text states:

Land at and adjoining St Georges Works, Muspole Street (approx. 0.55 ha) is allocated for residential-led mixed use development. This has the potential to provide a minimum of 110 homes, together with a minimum of 5000sqm offices and managed workspace and potentially other ancillary uses such as small-scale retailing.

The policy wording suggests that the site can deliver 110 dwellings and at least 5,000 sq m of employment floorspace. It is unclear how these figures have been arrived at. The planning history for the site is extensive and there have been a number of applications approved on the site that have not been implemented.

We would suggest that the site can deliver either in the region of 110 dwellings or 5,000 sq m of employment floorspace, or a mix of these uses. The mixed use scenario is the most likely outcome.

Without the GNLP providing evidence of how the 110 dwellings and 5,000 sqm employment floorspace has been determined as an appropriate development quantum we would suggest that in the interim the policy should state the following:

*Land at and adjoining St Georges Works, Muspole Street (approx. 0.55 ha) is allocated for ~~residential-led mixed use~~ **comprehensive** redevelopment. This has the potential to provide ~~a minimum of~~ **in the region of 110 homes, or together with a minimum of circa 5000sqm of commercial floor space that could incorporate** offices and managed workspace and potentially other ancillary uses. ~~such as small-scale retailing.~~ **The site could be redeveloped to provide a mix of both residential and commercial activity.***

We would be pleased to engage with the GNLP Planners prior to the next stage of the Local plan process to discuss precise wording for the policy and to provide updates on our progress with taking the site forward.



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Without incorporating the suggested changes to the policy or engaging with the site owner on how the current draft policy has been formulated we would suggest that the policy fails to meet the tests of the NPPF and the policy would be considered unsound.

The policy is mistaken in the quantum of floor space that can be delivered across the site and therefore it is not positively prepared, it will not enable the GNLP to meet its objectively assessed needs; this would also render the policy ineffective and undermine the overall strategy .

If you have any questions regarding this letter, please don't hesitate to contact me.

Regards

Ian Reilly
Regional Director