



Brettingham House, 98 Pottergate, Norwich NR2 1EQ
T 01603 631 319 F 01603 628 464 E info@lanproservices.co.uk

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 GNLP3054:
Site at St Mary's Works and St Mary's House**

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:

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 and employment uses, with the possible addition of a hotel. The site will deliver a minimum of 150 homes.

We consider that when regard is had to the quantum of floor space that can be delivered through this site, which respects the design and heritage issues raised in the supporting text, the above policy confirms that the redevelopment of the site should be residential led and that any employment provision would be very much a minor aspect of the redevelopment. Any employment provision should be focused on creating services and facilities for local residents and the development of such floorspace should be subject to market considerations and not be detrimental to the viability / vitality of the existing city centre uses.

The minimum requirement for 150 dwellings is noted, despite our previous representations on this matter. We would suggest that this number should not be stated as a minimum but that the site should deliver in the region, or order, of 150 dwellings.

Point 7 of the policy text states:

Residential development should be provided in response to identified local community needs demonstrated through a future planning application to be appropriate for this edge of City Centre site.

The site is a brownfield opportunity area in the city center, it is unclear what the GNLP is attempting to achieve by stating that residential development should be provided in response to identified local community needs. There is a need for a wide variety of housing types in the GNLP area and the nature of the residential redevelopment of the site will be a commercial decision that will ultimately respond to market demands, that could include traditional C3 use class housing, Build to Rent, purpose-built student accommodation and / or co-living.

This requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy.

The conversion of the locally listed building, St Mary's Works factory, is an objective of the policy. The building is of significant scale and does not lend itself easily to conversion for either residential or employment uses. We would suggest that the policy wording should be amended to allow for there to be a full or in part retention option.

We would suggest the following amendments to the policy text:

Policy GNLP3054

The site at St Mary's Works and St Mary's House (1.05 ha) is allocated for a residential led comprehensive mixed-use redevelopment to potentially include employment uses, with the possible addition of a hotel. The site will deliver in the order of a minimum of 150 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 historic and industrial context, the significance and setting of heritage assets on and off site, and the character and appearance of the City Centre Conservation Area;
2. There will be a general presumption in favour of the repair and re-use of heritage assets on site as part of any site regeneration, however any application for redevelopment will be considered on its merit. Great weight will be given to the conservation of all designated heritage assets. Proposals will include the protection of the listed and locally listed buildings on the site and the enhancement of the significance of the setting of designated heritage assets both on and off site;
3. Conversion of the locally listed St Mary's Works factory, including the façade of the locally listed frontage to Oak Street / St Mary's Plain should be retained, **in full or in part**, as part of a development scheme. Proposals which seek to convert, alter or demolish the locally listed buildings or have a harmful impact on the significance of their setting will be considered on their merits. Clear justification for all proposals will be required **with consideration to other objectives that this policy and others wish to deliver**;
4. Respect the setting of grade I listed St Martin at Oak and St Mary Coslany churches and create enhanced views of the buildings and respect the setting of grade II listed Folly House and Pineapple House;
5. Development proposals should draw upon local character and distinctiveness and preserve or enhance the character and appearance of the conservation area;
6. Proposals will be required to adopt and implement a strategy of heritage interpretation;
7. **New residential development is accepted and could provide for a range of dwelling types and tenures including build to rent, purpose built student accommodation, care and extra care housing, co-living and/or any other commercially viable residential scheme that the site owner would wish to bring forward.** Residential development should be provided in response to identified local community needs demonstrated through a future planning application to be appropriate for this edge of City Centre site.
8. Achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the adjacent churchyards along with improved public access;
9. Ensures a level of surface water flood resilience and incorporates appropriate flood mitigation measures addressing identified risks from surface water flooding;
10. A noise impact assessment and air quality assessment will be required, and the development



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- must be designed to mitigate the impact of noise from the main road;
11. 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 and should reflect the tight urban grain of development predominant in the conservation area;
 12. Increased connectivity between the site and the surrounding townscape. 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.
 13. Car free or low car housing in accordance with Policy 2 is appropriate in this location.

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.

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

Regards

Ian Reilly
Regional Director