

Planning Statement

Carrow Works, Norwich

July 2023

Turley

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Client
Fuel Properties (Norwich) Ltd

Our reference
ZMLC3000

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1. Introduction

- 1.1 This Planning Statement (hereafter referred to as the 'statement') has been prepared on behalf of Fuel Properties (Norwich) Ltd (the 'applicant') in support of the following development proposal:
- 1.2 Hybrid planning application (part full, part outline), alongside Listed Building Consent and Demolition within a Conservation Area for the following:

Detailed (Full) Component:

"Full application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use, up to (Use Class C3) of the Lodge, Garage and Gardener's Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C2 and/or C1 and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625 sq.m (GIA) of flexible commercial business, service and local community and learning floorspace), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works"

- 1.3 The full component of the application covers a site area of 5.02 ha.

Outline Component:

"Outline planning application for demolition of existing buildings and replacement with phased residential-led up to 1,716 units (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or Sui Generis), (total of 9,005 sq. m (GIA) of commercial, business, service, local community and learning and Sui Generis floorspace) landscaping, open space, new and modified access".

- 1.4 The outline component of the application covers a site area of 11.9 ha.

Listed Building Consent

- 1.5 Listed Building Consent is sought for the alteration, including some demolition, extension and adaptation of Listed Buildings within the site, namely:

- Carrow Abbey (Grade I), including attached 1970s Dining Hall;
- The Lodge, Gardener's Cottage and Former Cart Shed (Grade II);
- Carrow Works Block 92 (Grade II);
- Carrow Works blocks 7, 7A, 8A and 8 (Grade II); and

- Former Mustard Seed Drying Shed (Grade II).

Scheduled Ancient Monument

1.6 An Application for Scheduled Ancient Monument Consent was submitted to Historic England by Icen Projects on 29th June 2022. Whereas the application does not form part of this hybrid planning application submission, consent is sought for the following to facilitate the development proposed:

- Below ground works to demolish single storey 'bungalow' extension to the south side of Carrow Abbey (Grade I);
- Works to create a strategic planting scheme on the east side of the Abbey creating private spaces, including post and rail fencing with native hedge planting to soften boundary; and
- Tree planting along the boundary with new planting of native trees.

Planning Application Contents

Submission Documentation

1.7 This Planning Statement should be read in conjunction with the comprehensive suite of documentation submitted in support of the hybrid planning application. For full details of other submission documentation, please refer to the 'Hybrid Planning Application Submission Document Table', prepared by Turley.

Planning Statement Structure

1.8 This Planning Statement is structured as follows:

Section 2: Site and Context

1.9 Section 2 provides a detailed description of the hybrid planning application site and immediate surroundings, including the history of the existing built form. The planning history considered relevant to this hybrid planning application is also listed, including relevant Environmental Impact Assessment (EIA) Scoping Opinion Request made to Norwich City Council in the lead up to the submission of this application, including the Council's formal EIA Scoping Response.

Section 3: Pre-Application and Stakeholder Engagement

1.10 Section 3 outlines the extensive pre-application engagement undertaken for the proposed development, including with Norwich City Council, Norfolk County Council, Historic England and the Lead Local Flood Authority. In addition, a summary breakdown of the Public Exhibition is provided.

Section 4: The Proposed Development

1.11 Section 4 sets out the details for the hybrid planning application, including a detailed breakdown of the proposed development within the full element of the application,

that proposed, on a parameter plan basis for the outline element of the proposed development, alongside full details of listed building consent and demolition in a conservation area.

- 1.12 The section also includes a detailed breakdown of the land uses and quantum of development proposed, alongside landscaping, highways, car and other parking provision.

Section 5: Planning Policy Framework

- 1.13 Section 5 sets out the relevant national and local planning policy and context as set out in the National Planning Policy Framework and the Adopted Norwich Local Plan. In addition, Section 5 sets out and focuses on the emerging policy and guidance as contained within the Greater Norwich Local Plan, given the policies contained therein are considered to carry material weight in the determination of planning applications. In addition, reference is made to the East Norwich Strategic Regeneration Area Supplementary Planning Document.

Section 6: Planning Assessment

- 1.14 This section assesses the proposed development against the Development Plan documentation considered of relevant, as detailed in Section 4.

Section 7: Summary and Conclusions

- 1.15 This section provides an overall summary and conclusions for the proposed development.

2. Site and Context

The Site

- 2.1 The site covers an area of approximately 16.92 ha and is bounded by a rail track to the east, the A147 and Bracondale Road to the south, the River Wensum to the north and Carrow House and associated car parking to the west.
- 2.2 The site is located approximately 1.3 km to the southeast of Norwich City Centre, with its wide variety of services, including the central railway station which is 0.6 km from the western boundary of the site.

Access

- 2.3 The site takes its primary vehicular access from the ring road via the five- arm roundabout junction of Martineau Lane (A1054) and Bracondale (A147). Due to the former use of the site (see below for full details), Bracondale is wide at the highway boundary, widening out within the site to provide three barrier-controlled entry lanes and two barrier-controlled exit lanes.
- 2.4 Beyond these entry control barriers, an internal access road runs east and west from the control point and forms a complete circuit around the perimeter of the site.
- 2.5 Pedestrian, cycle and emergency access to the site exists at the north-western corner via Paper Mill Yard, and pedestrian and cycle access at the north-eastern corner of the site via an existing underpass beneath the rail line.

Existing Built Form

- 2.6 The historical evolution of development on the site is believed to date back to 1114 when the Benedictine Priory of Carrow was founded. Later maps of the site outline the development of the site which has culminated in its current built form, with the relocation of Colman to the site in 1854. During this period, the Colman Factory was established and opened, including the original bridge location to the north west corner of the site, connecting the site with Norwich City Centre.
- 2.7 Later maps from 1950 and during the period 1950-2018, show the post-war form of the site, with the site being rebuilt and expanded, including Colmans coming under the management of Unilever. In 2018, Colmans factory closed.
- 2.8 The site today comprises a number of buildings and facilities linked to the manufacturing of products carrying the Coleman's brand, and those for Unilever and Britvic, comprising the following:
 - Mustard Seed Driers – circa 1870-1900
 - Storage Area Wets- circa 1870-1900
 - Mustard Seed Store- circa 1870-1900

- Dry Food Units – circa 1950-1969
- Culinary Unit- circa 1950-1967
- Mustard Seed Silo – circa 1901-1940
- Jif Plant- circa – 1950-1969
- Technical Centre- 1950-1969
- Abbey Dining Room – 1950-1969
- Carrow Abbey- circa 12th century
- Ready Drinks Unit- Britvic- 1970-2000
- Mustard Seed Intake- 1970-2000
- Warehousing Britvic (circa 21st Century)
- Concentrate Soft Drinks Britvic- circa 1970-2000
- Boiler, Water Plant House- circa 1901-1949
- Works Entrance and Gatehouse – circa 1970-2000
- Contractors Workshop Shared- circa 1950-1969
- Mustard Plant – circa 1950-1969.

Existing and Former Uses

- 2.9 The site is predominantly vacant, with some employment uses still in operation across the eastern portion of the site. The land uses associated with the existing structures on the site can be characterised as a mix of B1, B2 and B8 uses, with some conferencing facilities.

Designations

- 2.10 The site falls partially within the Bracondale Conservation Area, within which there are a number of designated and non-designated heritage assets and other designations, as follows:

Statutory Designations

- Scheduled Ancient Monument- Carrow Priory.
- Carrow Abbey – Grade I and within Scheduled Ancient Monument grounds.
- Carrow Priory (ruins)- Scheduled Ancient Monument.

- Lodge, Gardener's Cottage and Former Cart Shed – Grade II and within Scheduled Ancient Monument grounds.
- Walls, steps and paved surfaces of the sunken garden near Carrow Abbey- Grade II and within Scheduled Ancient Monument grounds.
 - Flint Wall and 19 attached pet tombs – Grade II and within Scheduled Ancient Monument grounds.
 - Carrow Works Block 92 – Grade II
 - Carrow Works Blocks 7, 7A, 8A and 8, including metal canopy attached to Block 7- Grade II
 - Former Mustard Seed Drying Shed- Grade II

Non-Designated Assets

- Stable Cottages- Locally Listed
- Carrow Works Factory – Locally Listed

Planning History

The Site

- 2.11 The City Council's planning application on-line public access system reveals that the site has an extensive planning history, dating back to 1989.
- 2.12 This planning history reveals a range of proposals associated with the former use of the site, comprising as it does 48 planning history entries.
- 2.13 Of particular relevance to this hybrid planning application, is the Environmental Impact Assessment Scoping Opinion.

22/00540/EIA- Environmental Impact Assessment Scoping Opinion

- 2.14 On 24th April 2022, an Environmental Impact Assessment (EIA) Scoping Opinion request was submitted to the City Council for consideration, setting out as it did, that the applicant would carry out an EIA and submit an Environmental Statement in support of the hybrid planning application.
- 2.15 On 26th May, the City Council issued the EIA Screening Opinion confirming that the proposal would constitute an EIA development requiring that any further planning application will need to be accompanied by an Environmental Statement.
- 2.16 Alongside this, the City Council issued an EIA Scoping Opinion, formulated following consultation with statutory and non-statutory bodies.
- 2.17 The EIA Scoping Opinion confirmed that the Environmental Statement should include the following subject/topic areas:

- Transport and Access;
- Air Quality;
- Noise and Vibration;
- Biodiversity and Nature Conservation;
- Water Quality, Hydrology and Flood Risk;
- Soils, Geology and Contamination;
- Archaeology;
- Heritage, Townscape and Visual Impacts;
- Socio-Economics; and
- Climate Change.

2.18 Full details of the EIA Scoping Request and Norwich City Council's EIA Scoping Opinion can be found in the Environmental Statement submitted in support of this hybrid planning application.

3. Pre-Application and Stakeholder Consultation

Pre-Application Meetings

- 3.1 Formal pre-application consultation was undertaken with Norwich City Council as part of a Planning Performance Agreement, commencing in December 2021 through to the date of this submission, as detailed below.

Pre-Application Meeting No 1- 16th December 2021

- 3.2 The first pre-application meeting took place with Norwich City Council on 16th December 2021, where the site-wide principles of development were presented, alongside the planning strategy and the anticipated hybrid form of any future planning application, including the maximum flexibility sought through outline form.
- 3.3 Whereas the design principles were generally supported by the City Council, including the proposed retention of many of the site's heritage assets, some concern was raised regarding the relationship between the height and massing of the proposed apartments along the river front and houses to the south.

Pre-Application Meeting No 2- 16th March 2022

- 3.4 The second pre-application meeting took place on 16th March 2022 where design amendments were presented in response to feedback received from pre-application meeting no 1.
- 3.5 These amendments included the articulation of more detail and indicative layouts to demonstrate the residential quality of the apartment blocks along the river. The relationship between the apartments and houses to the south was also developed to create a more gradual transition and to aid in the activation of the east-west route through the site.
- 3.6 Detailed discussions were also undertaken surrounding the alignment of the proposed development with the emerging East Norwich Strategic Regeneration Area Supplementary Planning Document (SPD), especially in respect of the proposed Parcel 6 which has been allocated as apartments in the SPD.
- 3.7 It was agreed that the outline application and framework would aim to provide flexibility in this parcel to allow either high-density housing or apartments to come forward. The approach of using a Design Code was introduced during this meeting and it was generally agreed that this would be a suitable approach. The council requested that a further meeting to discuss the Design Code approach in more detail would be useful.
- 3.8 Concern was raised over the area around Carrow Abbey and it was agreed that this should be addressed further in a separate heritage focused Pre-Application meeting which focused solely on this area of the site.

Conservation and Design – Norwich City Council – 21st April 2022

- 3.9 A heritage, conservation and urban design focused meeting took place with officers of Norwich City Council at the Carrow Works site on 21st April 2021. The purpose of the meeting was to have a discussion and walk-around specifically focusing on Carrow Abbey and its surrounding grounds.
- 3.10 An analytical design study was presented which had been undertaken in response to the previous Preapplication feedback, with the aim to fully understand the significance of the area and develop proposals that would not only respect the Abbey and grounds, but restore it back to its former glory.
- 3.11 The result of this exercise was a complete redesign of the area around the Abbey which would:
- re-instate historical routes;
 - replace poor-quality 20th century buildings with high quality houses that would frame the Abbey and reflect its architecture in a contemporary and subservient manner; and
 - replace a lot of the existing hard standing with new open green space and planting.
- 3.12 The council were in support of the general approach, noting that the new housing to the west would be a significant improvement to the character of the grounds from the existing technical centre. It was also agreed that there is an opportunity for new housing on the footprint of the dining hall, but further detail would be needed in order to understand how they would sit in the context of the Grade I listed Abbey.
- 3.13 The key concern that was raised was regarding the apparent loss of connection between the Stable Cottage, Garden Lodge and the Abbey. Whilst it was acknowledged that the reinstatement of the sweeping road aided this connection, it was suggested that the new housing along this route would cause unsatisfactory obstruction. The 6 houses proposed to the north of the flint wall were also seen as potential to cause harm to the historic significance of this area, requiring the demolition of part of the flint wall and removal of what's left of the glass houses.
- 3.14 Following the walk-around the site and the grounds of the Abbey together, it was agreed that the secluded nature of the Abbey grounds was special, and the proposed development should ensure that this remains.

Design Codes- Norwich City Council – 09th May 2022

- 3.15 A meeting took place with officers of Norwich City Council on 9th May 2022, to present and agree the planning strategy for the hybrid planning application, with a particular focus on how the Parameter Plans and Design Code will be used to provide a bridge between the Outline Application and Reserved Matters, so that placemaking can be managed and heritage assets protected whilst allowing parts of the site to be developed at different timescales.
- 3.16 In this meeting it was agreed that the Parameter Plans would ensure a framework for issues of particular importance such as heights and massing. In turn, the Design Code

would ensure that the character of the areas would reflect the existing nature of that part of the site. For example, the riverfront apartments would need to be contemporary next 19th century factory buildings but retain an industrial feel through varied massing and playful roofscapes. The character around the Abbey grounds, by contrast, would need to retain its secluded, peaceful and green qualities and allow the Abbey to breathe.

3.17 The council acknowledged the benefits of this approach but were keen to ensure specific details were included within the Design Code, such as:

- Maximum building heights, including sectional drawings showing various possible roof forms;
- Indication of active frontages;
- Servicing, refuse and cycle strategies;
- Widths of roadways and distances between buildings;
- Key views and heritage interpretation;
- Boundary treatments; and
- Wide-ranging materials palette and precedents to allow a variety of architecture in order to reflect the international, art deco and industrial characteristics of the existing site; and
- Individual design coding for each character area.

Highways- Norfolk County Council Pre-Application Meeting No 1 – 09th May 2022

3.18 Discussions with the Highways Authority at Norfolk County Council took place on 9th May 2022 in order to establish existing conditions, impacts of the proposal and the access and movement strategy for the development. Key points of discussion were:

- Observed baseline conditions (site traffic and local highway traffic);
- Proposed development (schedule, mix and character areas);
- Movement strategy (hierarchy of road users);
- Internal road and footway network;
- Car and cycle parking provision;
- Means of access from the public highway;
- Assessment of off-site effects;
- Off-site mitigation/improvements to promote walking and cycling; and
- Format and content of Transport Assessment.

- 3.19 In general, highways officers were supportive of the regeneration of the area and the proposed movement and parking strategy within the site, agreeing that 'Car Free and Low Car Housing' should be encouraged where possible. However, concern was raised over vehicular access points into and out of the site, suggesting that a single point of access would not be suitable for the amount of additional traffic the development would create. Although it was proposed that the existing entrance road from Bracondale roundabout be re-modelled to form parallel carriageways, effectively creating two means of access and egress, the council rejected this as a solution and requested a second point of access elsewhere.
- 3.20 Highways officers also requested the three off-site junctions be assessed for the need for potential improvement works for pedestrians and cyclists as a result of the proposed development.
- 3.21 Full details of this pre-application meeting can be found within the Transport Assessment, prepared by Entran, Environmental and Transport.

Lead Local Flood Authority- Norfolk County Council – 11th May 2022

- 3.22 The team met with the Lead Local Flooding Authority (LLFA) on 11th May to discuss ways of reducing the risk of flooding from surface water, groundwater and ordinary watercourses. Curtins Civil Engineer's presented the current proposal for the flooding and drainage strategy in order to aid the dialogue.
- 3.23 Key points of discussion were:
- Surface water discharge into the River Wensum;
 - Discharge rates to be limited to offer a "significant" betterment with the aim of achieving greenfield, under the understanding that the site has significant constraints and is a brownfield site;
 - Permeable pavements and rain gardens to be lined in the northern areas due to the proximity to the river and contamination;
 - Management of water quality;
 - Water re-use around the site, particularly where sewerage is to be offered for adoption ;
 - Attenuation storage proposed for main access road;
 - Extensive use of SuDs across the scheme in the form of raingardens, permeable pavements, tree pits, and bio retention areas; and
 - Blue roofs to be proposed for new apartment blocks.
- 3.24 The meeting articulated a better understanding of the extent of flooding elimination and mitigation strategies required on the site. The LLFA advised that a CCTV survey will be required for the heritage areas that are proposed to be retained and raised some

concern of the complications involved with the need for attenuation under the highway with regards to the adoption strategy.

Conservation and Design – Norwich City Council – 12th May 2022

- 3.25 Following from the on-site meeting with officers on 21st April 2022, regarding the broader historic area of the Abbey and grounds, a separate meeting was arranged with Norwich City Council in order to discuss in more detail the proposals for the retention and refurbishment of Carrow Abbey and the Gardener’s Lodge.
- 3.26 Donald Insall presented two options each setting out the Abbey’s conversion into 3 residential dwellings. The two options were are described below:
- 3.27 Option 1 focused on the conversion of the building to form 3 residential dwellings , including a northern extension, and internal interventions, including removal of walls and the subdivision of existing rooms to facilitate the requisite residential layouts.
- 3.28 Option 2 focused on the conversion of the building into 3 residential dwellings , including a northern extension and a wider extension to the south, and internal interventions, including removal of walls and the subdivision of existing rooms to facilitate the requisite residential layouts.
- 3.29 Both options presented were designed by Donald Insall to have minimal impact on the existing fabric and utilised the historic hierarchy of the 3 parts of the Abbey in the separation of the 3 homes. Whilst this approach was acknowledged, the council expressed unease at the idea of subdividing what was originally built to be one single residence, mainly due to the interior features, such as exposed timber beams, needing to be experienced together in their entirety.
- 3.30 The council also requested that any new extension be subservient to the existing build, which Donald Insall confirmed it would be. Donald Insall also presented options for the refurbishment of the Gardener’s Lodge into 3 new dwellings, again minimising impact to the existing fabric. The council were supportive of these proposals and agreed that these buildings led themselves to residential use. The council concluded that thorough analysis would be required in the Heritage Impact Statement in order to fully assess these proposals

Landscaping, Trees and Open Space- Norwich City Council- 17th May 2022

- 3.31 In this meeting Bowles & Wyer presented their working landscape proposals for discussion, the key principles of which are outlined below:
- Creating new links to the wider landscape
 - Creating heritage links and celebrating the industrial heritage
 - Protecting and enhancing the open space
 - Adding to the tree planting legacy

- 3.32 The council were extremely supportive of how the landscape strategy will open up the site to the public and create a connection between the urban and rural, and all were in agreement that the connection to Whitlingham Country Park cannot be understated. The landscape proposals showed not only retention of existing trees but enhancement of these areas through new tree planting.
- 3.33 This was received very positively, however it was requested that further information and a full tree survey will be required to be submitted in order to fully assess this. The presentation by Bowles& Wyer focused on the areas of the landscape proposed to be in detail. Naturally, the council were keen to see and understand how new green parks and connections are going to be introduced into the outline, more dense residential areas, which are currently predominantly hardstanding. Suggested features were community growing areas, green link paths and water features.

Historic England – 17th May 2022

- 3.34 During this meeting JTP, Icen and Donald Insall presented proposals to Historic England, beginning with the overall masterplan and then focusing on the Abbey & Cottages character area.

Coleman's Site

- 3.35 The presentation outlined the key principles of opening up Colman's history to Norwich: retaining and refurbishing the listed buildings and heritage assets; and linking the historic factory buildings through public routes and squares to create a kinetic heritage experience. The team received a very positive response to these proposals from Historic England, in particular how the industrial character along the river appears to be retained.
- 3.36 Historic England were keen to see more detailed proposals for Robinson's Terraces to the East of the site and how the historic use of the tramline and kitchen gardens will be reflected in the proposed housing parcel. It was noted that the houses facing side on to the Abbey Grounds is a strong principle, strengthening the disconnect between the two areas.

The Abbey and Cottages

- 3.37 The team presented the historic analysis which led to the current proposal in this area. The concept of building on the footprint of the existing 20th century buildings and hardstanding were accepted in principle and the reinstatement of green areas and historic routes was positively received. The broken up massing and separation of the new housing on the footprint of the technical centre was commended, noting that this will keep a visual connection between Carrow Abbey and Carrow House.
- 3.38 However, Historic England raised an issue with some of the housing proposed to the south of the Abbey, arguing that this is a highly sensitive area and that the proposed development would result in the loss of the glass houses and part of the flint wall. Concern was also raised over the way some of the new houses would break up the connection between the Stable Cottage, Garden Lodge and Abbey, commenting that

the curved route linking these buildings should be surrounded by green space rather than direct housing frontages.

Highways- Norfolk County Council – Pre-Application Meeting No 2 - 22nd June 2022

- 3.39 A second pre-application meeting was undertaken with highways officers on 22nd June 2022. Full details of the meeting can be found within the Transport Assessment, prepared by Entran Transportation.
- 3.40 It was agreed at the meeting, that a series of further highways and transportation meetings will take place with officers of the County Council.

Public Exhibition Event -23rd and 24th June 2022

- 3.41 A public exhibition was arranged over two days in order to gain feedback from neighbours of the site as well as members of the public who have a historic relationship with Carrow Works. Thirteen large format boards were displayed with information and visual aids and several members of the consultation team were on hand to answer any questions.
- 3.42 On 23rd June 2022 an event was held at the Jubilee Community Centre in Norwich, followed by an event at the Carrow Abbey on 24th June 2022.
- 3.43 The comments received from members of the public are outlined below:
- Creating the connection between the city centre and Whitlingham Country Park by making the riverside publicly accessible and opening up the underpass is welcomed;
 - New ‘destination’ with commercial offerings along Mustard Mill Way is welcomed;
 - Potential new bridge connection in the same location as was historically is welcomed;
 - Questions were raised over the level of affordable housing;
 - Some concerns were expressed the impact of vehicle traffic onto Bracondale
 - Car free and low car housing strategy welcomed; and
 - Positive feedback received over retention of existing buildings; • Positive feedback received over proposed architecture and character.
- 3.44 Full details of the public exhibition event are contained within the Statement of Community Involvement, prepared by Marengo Communications.

Pre-Application Meeting No 3- 28th June 2022

- 3.45 Pre-application meeting no 3 took place on 28th June 2022 with Development Control officers and the Conservation and Design officer of Norwich City Council, where the evolution of the proposed development was presented.

- 3.46 The presentation focused on design development since the first pre-application meeting with officers in December 2021, including articulation of how the scheme has evolved to respond to officer feedback.
- 3.47 On 29th June 2022 feedback was received from officers, acknowledging the level of work that has taken place and the proactive approach taken throughout the pre-application process. Officers noted several areas where the applicant has positively responded to feedback received, whilst at the same time, setting out areas that require further attention.

Highways- Norfolk County Council – Pre-Application Meeting No 3 – 1st February 2023

- 3.48 Further to Pre-Application Meeting No 2 on 22nd June 2022 and the subsequent submission of the Hybrid planning application (Reference: 22/00879/F) on 8th July 2022, highways and transportation comments were received from Norfolk County Council on 06th December 2022 to the Transport Assessment, prepared by Entran.
- 3.49 Entran prepared a detailed response to the comments on 30th January 2023 in advance of a site visit with the County Council on 1st February 2023.
- 3.50 It is anticipated that further detailed discussions will take place between Entran and the County Council over the course of the summer and autumn of 2023.

Historic England – 24th May 2023

- 3.51 A further pre-application meeting took place on-site with representatives of Historic England on 28th March 2023.
- 3.52 On 24th May 2023, Historic England provided formal written advice as follows:

Significance of the historic environment.

- 3.53 This is a fascinating site with the remains of a Benedictine convent, remodelled and expanded in the late Victorian and Edwardian period as a private home for the wealthy Colman family, who simultaneously developed their industrial works adjacent to this along the river. It has a high level of archaeological, architectural and historic significance in these layers.
- 3.54 The ruined portions of the Priory are a rare survival of one of a small known number of female religious houses. Founded in 1146 it has exceptional standing, buried and earthwork remains.
- 3.55 The remains include the prioress's house built in the 15th century then adapted and expanded to form the Colman's home. This is a grand late Victorian and Edwardian home for an industrial magnate. The craftsmanship and detailing are of a very high quality and much survives of the fabric and plan form. It illustrates the work of Edward Boardman, an important architect with strong associations with Norwich.
- 3.56 Carrow House, although not part of the application site, forms part of the domestic core of the site. It is a large mid nineteenth century villa rebuilt and extended,

probably also by Boardman. It has a fine and well preserved late Victorian conservatory by Boulton and Paul of Norwich.

- 3.57 The industrial works was located adjacent to the River Wensum and symbolises the Colman's lengthy occupation of the site. Several the buildings, mostly later nineteenth century, are listed grade II for their architectural interest, clearly illustrating their industrial function; the historic interest of the Colman's business and group value with other designated buildings.
- 3.58 One of the important characteristics of the site is the distinctive characters of the Abbey site and the industrial works. The dramatic change in gradient between the Abbey and works site provided a separation between the factory and domestic parts of the site. This was strengthened by planting. Abbey House sat in its private gardens and parkland, like a small country house on the edge of the city. While this has been eroded in areas by the later twentieth century expansion of the industrial buildings, the core of the garden remains, this and the open character of the site contribute to the significance of the Abbey House and monument.
- 3.59 The designations were recently reviewed and updated by our Listing Team. The priory is scheduled, the Abbey House listed grade I and other ancillary buildings and former industrial buildings listed grade II. Carrow House is listed grade II and its conservatory grade II*. Other historic ancillary buildings are also heritage assets. There is a strong group value with all these. Part of the site falls within the Bracondale Conservation Area and is close to the Trowse and Millgate Conservation Area.

Approach and methodology

- 3.60 A hybrid planning application would not provide sufficient information to enable an assessment of the proposals and give confidence that they will sustain and enhance the listed assets. The historic environment is clearly exceptional, as is reflected in the number of heritage designations on the site. On the Abbey site there are a high concentration of designations. Significant new development is proposed near the monument and buildings on the site of the technical building and between the stables and lodge building.
- 3.61 Within the documents there are several references to engagement and agreement with Historic England which we do not recognise. In particular, paragraphs 2.63, 6.4 and 9.1 reference detailed discussions and agreement of viewpoints. Contrary to this, we have had very little engagement from you until this spring.
- 3.62 The documents contain a lot of information, but we would encourage a more over-arching assessment of character areas. We also note that the church at Trowse has not been included in the grouping here and should be assessed. The text should also note the air raid shelters are designated.

Impact of the proposals

The subdivision of Abbey House

- 3.63 We have serious concerns about the proposal to subdivide Abbey House into three residential properties. This would harm the significance of the Abbey building and the scheduled monument.
- 3.64 The subdivision of Abbey House would mean the building could no longer be appreciated as a single property. Much of the Abbey's architectural and historic interest lies in the high survival of late Victorian and Edwardian fabric and the plan form. The division of the house would limit the ability to appreciate its plan form and the quality of the rooms and fabric which collectively illustrate a high-status domestic property of this period.
- 3.65 The insertion of partitions and services to create the separate dwellings would compromise these rooms and the historic fabric. The division between houses 1 and 2 affects the two grandest parts of the house, including rooms with exceptional panelling and other fixtures. The addition of new panelling could compromise the rooms. The insertion of a bathroom on the first floor of house 1 would detract from the space and appreciation of the moulded timber ceiling. The bathroom proposed between the existing staircase and window also looks very tight against the window. The division between houses 2 and 3 would cut across the tiled service corridor on the ground floor and panelled cupboards on the first floor corridor.
- 3.66 Externally, the former monastic cloister can still clearly be read as such and provides a tangible link between Abbey House and the upstanding priory ruins. Any subdivision of the cloister into private gardens, or separation of it from the priory ruins or house, would substantially compromise the way the monastic complex can be understood and appreciated and would harm the significance of both the scheduled monument and grade I listed house.
- 3.67 The resulting separate ownerships would create challenges for the future management of the monument in a holistic way and could compromise how it is appreciated.
- 3.68 Any fencing or other boundary treatments necessary to subdivide the cloister or priory ruins area would require scheduled monument consent. Historic England would be unlikely to be able to recommend to DCMS that scheduled monument consent (SMC) should be granted for such a proposal as we do not consider that the harm to the significance of the monument that would result would be outweighed by any public benefits.

Other external works to Abbey House

- 3.69 The twentieth century bungalow does not contribute to the significance of the Abbey and we would not object to its removal.
- 3.70 The proposed extension at the northern end on the Abbey may harm the significance of the building. However, we have yet to see drawings of this. It is higher than the existing link at two storeys and likely to obscure more of the exceptional flint work identified in the Design and Access Statement. The building also reads as three separate phases, the oldest to the north. The addition of a two-storey element here may erode this clear presentation of phasing.

The replacement of the dining hall

- 3.71 The dining hall does not contribute to the significance of the site and we would support its sensitive removal linked to an appropriate approach to the presentation of the monastic complex. Removal of the dining hall and floor slab would require SMC.
- 3.72 We do however have serious concerns about the proposal to replace the dining room with residential dwellings. Any new-build structures on the floor slab of the dining hall would have an adverse impact on the setting of the scheduled monument and cause harm to its significance. The proposed courtyard of new dwellings would be an incongruous addition in relation to the Abbey House and priory ruins. It would also result in subdivision of part of the scheduled monument with the associated management issues that would arise as a result.

Ancillary historic buildings

- 3.73 We anticipate focusing our advice on any external changes, with the City taking the lead on internal works.

Proposed new development on the Abbey site

- 3.74 As discussed above, we do not consider there is sufficient information in an outline application to assess the impact of the dwellings on the site of the technical building.
- 3.75 The proposed new development in the area between the historic ancillary buildings on the approach to the Abbey would harm its significance and that of the monument. Abbey House was designed as a home for the Colman's within a garden setting. While the garden setting has been eroded by car parking in this area it has remained open. This also allows for a visual connection between these buildings and Abbey House and contributes to the significance of the buildings.

New development on the industrial works site

- 3.76 We have concerns the taller new buildings would be visible from within the Abbey site and harm its secluded and domestic character. There is little detail on the proposed development here, but verified views show the outline of the development. This rises above the tree line in views from the Abbey gardens, views 1 and 2.
- 3.77 The views also show the development rising above the listed warehouses in view 12. The impact of this should be carefully considered.

Legislation and planning policy

- 3.78 Scheduled Monuments are legally protected under the Ancient Monuments and Archaeological Areas Act 1979 (as amended). It is a criminal offence to demolish, destroy, damage, remove, repair, alter or add to a Scheduled Monument unless prior consent has been obtained from the Secretary of State for Culture, Media and Sport in the form of Scheduled Monument Consent.

- 3.79 For development related works that would lead to less than substantial harm to the significance of a Scheduled Monument, in making the decision the Secretary of State has particular regard to the principle that the harm will be weighed against the public benefits of the proposal (DCMS Policy Statement on Scheduled Monuments (2013) paragraph 20).
- 3.80 Legislation also sets out the statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, The Planning (Listed Buildings and Conservation Areas) Act 1990 16(2). Section 72 (1) refers to the desirability of preserving or enhancing the character of appearance of conservation areas.
- 3.81 This flows through to the National Planning Policy Framework (NPPF). In determining applications local authorities should take account of the desirability of this and putting heritage assets to viable uses consistent with their conservation. They should also take account of the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 197). Great weight to be given to an asset's conservation, and the more important that asset, the greater the weight should be (paragraph 199).
- 3.82 For this reason, there should be a clear and convincing justification for any harm (paragraph 200). Harm that is less than substantial should weighed against the public benefits of the proposal (paragraph 202).
- 3.83 The policy on achieving well designed places encourages the use of design guides and codes which take account of the guidance in the National Design Guide and National Model Design Code (paragraph 129).
- 3.84 Developments should be sympathetic to local character and history and establish or maintain a strong sense of place (paragraph 130).

Historic England's Position.

- 3.85 There is great opportunity to create a new vibrant quarter of the city at Carrow Works. However, in order to do so the proposals should respond to and enhance its distinctive historic environment. This would create a truly distinctive area complemented by contemporary development. This is supported in the legislation and policies relating to conservation and good design in the NPPF. The current scheme does not work hard enough to achieve this.
- 3.86 The historic core of the site around the Abbey, character areas 1, 2, 5 and elements of 4, is the most sensitive part of the site. While there is potential for considerable new development across the site as a whole, maintaining and enhancing these historic assets and the open garden setting around them is important. Because of the exceptional importance of the site, great weight should be given to its conservation.

- 3.87 Considering the significance of the site, the detailed application site should be extended to include the buildings proposed on the site of the technical building, directly opposite the Abbey. If, notwithstanding our advice, the proposed buildings between the stables and the Abbey remain, they should also be included. The Council may also wish to consider whether the outline application on the industrial works site provides sufficient detail to assess the impact on the grade II industrial buildings. The use of design guides and codes should help to inform the development and decision making.
- 3.88 The proposal to subdivide the Abbey and monument would be harmful to the grade I building and scheduled monument. Planning policy sets out the desirability of finding a viable use consistent with the conservation of a site. A use that allows the house to remain as a single entity and the land around it undivided would be consistent with its conservation. The Design and Access Statement claims the size and location as well as the arrangement of rooms makes the Abbey unsuitable for today's market expectations. This is not substantiated in the document and any future application would need to have a clear and convincing justification for any harm. We understand you intend to share further information on this shortly.
- 3.89 Any proposals to introduce new-build elements within the scheduled monument would require SMC and would have to meet the stringent public benefit test of paragraph 20 of the DCMS Policy Statement on Scheduled Monuments (2013). Historic England would be unlikely to be able to support an SMC application for replacement structures on the dining room site or recommend to DCMS that SMC should be granted for such a proposal.
- 3.90 We do not consider that replacement structures on the floor slab of the dining hall represents the optimum viable use of that part of the site. A unique opportunity exists within the redevelopment of the site to better reveal and present the full extent of the abbey church which has not been possible since the 1960/70s. Whilst we would not advocate the re-exposure of the currently buried archaeological remains of the western end of the priory church, their layout could be marked out at ground level so that they could be clearly read in relation to the existing ruins, Abbey House and cloister.
- 3.91 The removal of the housing between the stables and Abbey House and the soft landscaping of this area would reinforce the open garden setting which contributes to the significance of the building as a 'country house' and the monastic character of the site. A sensitive treatment to the approach, through character area 4, would also strengthen this.
- 3.92 There is clearly more scope for considerable development on the works site. However, further information and assessment should be provided on the heights of the buildings on the industrial site and their impact on the designated heritage assets both at Carrow Works and the surrounding area, including the City Centre Conservation Area and the landmark buildings here.

Further steps

3.93 We would welcome further pre application discussion with you. We understand further information relating to the subdivision of the Abbey is being produced and we would like to see this.

4. The Proposed Development

- 4.1 The proposed development has evolved following extensive conceptual assessments and feedback received following pre-application and stakeholder engagement since the December 2021.
- 4.2 This section describes the development proposed, including the assessments and background submitted in support.
- 4.3 Against this backdrop, this Planning Statement is submitted in support of a hybrid (part full, part outline) planning application, alongside applications for Listed Building Consent and consent for Demolition within a Conservation Area/s.
- 4.4 Given the scale and complexity of the application site, this Section breaks down and describes the development components as follows:
 - Hybrid planning application -providing a break-down of the following:
 - Full component description;
 - Listed Building Consent description;
 - Outline component description;
 - the Scheduled Ancient Monument; and
 - quantum of floorspace/land use proposed.
 - Detailed description of development proposed within the Full Component:
 - Access to the site;
 - Works to Listed Buildings;
 - Locally Listed Buildings;
 - Demolition within the Conservation Area; and
 - Landscaping Proposals.
 - Detailed description of the development proposed within the Outline Component:
 - Demolition; and
 - Development Proposed;
 - Site Wide Considerations (Full and Outline Components)
 - Public Realm and Landscaping proposals;

- Heritage, Townscape and Visual Impact Considerations;
- Highways and Transportation;
- Environmental Considerations; and
- Planning Obligations.

The hybrid planning application

- 4.5 The hybrid planning application, with some matters reserved with the exception of principal means of access for the site and relevant demolition of unlisted buildings in a conservation area. The hybrid planning application is supported by a series of Parameter Plans, including for the Hybrid Planning Application Boundary, Demolition, Land Use, Open Space, Building Heights and Access and Movement.
- 4.6 In addition, and especially for the outline component of the hybrid planning application, the proposal is the subject of an overall masterplan and a Design Codes, which defines a series of character areas across the outline component of the site.
- 4.7 The description of development proposed is as follows:

Full Planning Application Component

“Full application comprising the construction of the principal means of access, the primary internal road and associated public spaces and public realm, including restoration and change of use of Carrow Abbey to former use as residential (Use Class C3), alteration and extension and conversion to residential use (Use Class C3) of the Lodge, Garage and Gardener’s Cottage and the Stable Cottages, development of the former Abbey Dining Room for residential use (Use Class C3), adaptation and conversion for flexible uses (Class E and/or C3 and/or F1 and/or F2 and/or B2 and/or B8 and/or Sui Generis) for buildings 207, 92, 206, 7 (7a, 8 and 8a), 209, 35, the Chimney and Class E and/or B2 and/or B8 for the retained Workshop (Block 258), (providing a combined total of up to 143 residential units and 17,625 sq.m of flexible commercial business, service and local community and learning floorspace) enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works” .

Listed Building Consent

- 4.8 Listed building consent for alterations and/or extension and/or restoration of the Carrow Abbey, the Lodge, and Gardener’s Cottage and Stable Cottages, erection of residential units on the former Abbey Dining Room, and adaptation and conversion of Carrow Works West and Carrow Works East and the Former Mustard Seed Drying Shed.

Outline Planning Application Component

- 4.9 Demolition of existing buildings and replacement with phased residential-led (Use Class C3 and/or Class E and/or F1 and/or F2 and/or C1 and/or C2 and/or B2 and/or B8 and/or Sui Generis), landscaping, open space, new and modified access, car parking and ancillary works.

Scheduled Ancient Monument Application

4.10 An Application for Scheduled Ancient Monument Consent was submitted to Historic England by Icení Projects on 29th June 2022. Whereas the application does not form part of this hybrid planning application submission, consent is sought for the following to facilitate the development proposed:

- Below ground works to demolish single storey ‘bungalow’ extension to the south side of Carrow Abbey (Grade I);
- Works to create a strategic planting scheme on the east side of the Abbey creating private spaces, including post and rail fencing with native hedge planting to soften boundary; and
- Tree planting along the boundary with new planting of native trees.

Quantum/Land Uses Proposed

Table 1: Full Component

	Residential (Use Class C3)		Classes E and/or C1 and/or C2 and/or B2 and/or B8 and/or Class F1 and/or F2
Conversion	9		
New Build	9	-	-
Conversion	125	And/or	17,625 sq.m (GIA)
Total	143		17,625 sq.m (GIA)

Table 2: Outline Component

	Residential (Use Class C3) Market	Residential (Use Class C3) Build for Rent	Classes E and/or C1 and/or C2 and/or B2 and/or B8 and/or Class F1 and/or F2
Houses	377	-	-
Apartments	895	444	-
Commercial			9,005 sq.m (GIA)
Total	1,272	444	9,005 sq.m 9GIA)

- 4.11 In addition to the above, provision is made for Use Class F1 and/or F2 within the hybrid planning application site. The detailed elements, including the floorspace apportioned to each being developed, and will be provided in due course.
- 4.12 This hybrid planning application therefore proposes a maximum of 1, 859 residential dwellings (Use Class C3) and a maximum of 26,630 sq.m (GIA) of flexible range of uses as set out in Table 2.
- 4.13 In addition the following, indicative dwelling mix for the residential component is proposed, designed to the Nationally Described Standards:

Table 3: Indicative Dwelling Mix for the Hybrid Planning Application

	Apartments – Private Sale	Apartments – Build for Rent	Houses	TBC
1 bedroom	355	217	1	
2 bedroom	540	227	78	
3 bedroom			267	
4 bedroom			30	
5 bedroom			7	
TBC			12	125
	895	444	395	125

- 4.14 The proposed dwelling mix for the 1,859 dwellings proposed provides a healthy mix of 1 and 2 bedroom units, alongside a healthy mix of family housing units.
- 4.15 It should be noted, that as the detailed design of some elements of the proposed development progressing, especially for the buildings proposed to be converted, the dwelling mix may alter, including confirmation of the mix for the 137 units not currently allocated in Table 3 above.

The Full Application Proposals

Access to the Site

- 4.16 As set out in the Transport Assessment, prepared by Entran, shows that the development would retain the existing primary access from the Bracondale roundabout but remodelled in order to provide two separate carriageways. A secondary access onto Bracondale is also currently proposed.

Works to Listed Buildings

- 4.17 As set out in Section 2, the full/detailed component of the application site comprises a number of statutory listed buildings, including the Scheduled Ancient Monument.
- 4.18 The Listed Buildings in question including the Carrow Abbey (Grade I), and the Lodge, Gardener's Cottage and the former Cart Shed (Grade II).
- 4.19 It is proposed to repurpose these structures as part of the overall masterplan for the site, to provide residential accommodation. In light of this, Listed Building Consent is sought for the following works:

Carrow Abbey- Grade I

- 4.20 Further to a series of detailed feasibility studies, Donald Insall Associates has proposed the remodelling, including some demolition, alteration and extension of Carrow Abbey (Grade I), to create 3 houses, thus bringing the building back into its original use.
- 4.21 In order to achieve this, the existing dining hall and link extension are to be removed, along with the southern 20th Century bungalow.
- 4.22 The three houses to be created will consist of a 3-bedroom house and two 5-bedroom houses.
- 4.23 Full details of the works proposed to create these units is contained within the Donald Insall Associates Design and Access Statement and the detailed drawings submitted in support of the Listed Building Consent application/s.
- 4.24 In addition, the aforementioned Design and Access Statement, articulates sustainability, access, parking details, as follows:
- **Site Access-** the existing highway arrangement around the building will remain largely unaltered;
 - **Building Access-** existing doors and entrances have been retained, with the extension having a new door to the east elevation. The extension will have level access to the existing northern range of the Abbey. The existing floor levels have been retained, and only House No 2 has a level difference within the ground floor;
 - **Parking-** given the masterplan for the whole hybrid planning application site is seeking to deliver low-car parking provision, 1 car parking space per unit is proposed to be located east of the former cart shed; and
 - **Sustainability-** it is articulated in the aforementioned Design and Access Statement that options for improving the thermal insulation of the proposed houses is limited. This is mainly due to the extent and detail of existing wall panelling to be retained. This notwithstanding, the following thermal improvements may be possible:

- Between and under insulation to the second-floor attic spaces, following the existing ceiling profile, potentially between the rafters;
 - The addition of more insulation at the ceiling joist line to the central range, in addition to some existing insulation; and
 - The construction and extension to current Building Regulations with increased levels of insulation to floor, walls and the roof.
- 4.25 In relation to ‘conservation uplift’, the proposal could include the removal and cutting back of the existing asphalt road from the building edge, seeking to include a gravel border around the building edge, in order to encourage the shredding of water away from the building.
- 4.26 In addition, sections of external wall repairs and re-pointing will be undertaken to safeguard the building’s fabric.
- 4.27 Moreover, the removal of the modern buildings which are considered to detract from the architectural and historic interest of the Abbey, i.e., the dining hall and south bungalow, are considered to be a positive conservation benefit of the scheme.

The Former Dining Hall

- 4.28 It is currently proposed to construct 9 residential units on the footprint (the slab) of the dining hall following demolition of the 1970s non-designated structure.

The Lodge, Gardener’s Cottage and Former Cart Shed- Grade II

- 4.29 The Lodge, Gardener’s Cottage and Former Cart Shed comprise a group of buildings listed at Grade II.
- 4.30 The proposal is to repurpose these building within the existing footprint of the group to form 3 residential units.
- 4.31 In addition, the aforementioned Design and Access Statement, articulates sustainability, access, parking and fire related details, including the following;
- **Site Access-** the existing highway access arrangement around the group of buildings will remain largely unaltered.
 - **Building Access-** the existing access to the Lodge will remain largely unaltered, although the potential for level access will be explored. Level access already exists for the Gardener’s Cottage, whilst for the Former Cart Shed, due to a considerable level difference as existing, level access works are proposed.
 - **Parking-** Given that low parking provision is proposed across the hybrid planning application site, 1 car parking space per unit is proposed.
 - **Sustainability-** The proposals seek to provide as much thermal improvement as possible, without affecting the significance of the group of buildings. It is highlighted, that renewable heating and renewable energy (PV Panels) have

been discounted as these are considered to affect the group, and wider views of Carrow Abbey. Internal insulation enhancements are however proposed for each of the three dwellings.

Conversion for Flexible Uses

- 4.32 In addition to the aforementioned works requiring Listed Building Consent, it is proposed to repurpose a number of other heritage assets on the site (as included within the full application) through flexible Class E and or Class C3 use, as follows:
- Carrow Works Block 92 – Grade II.
 - Carrow Works Blocks 7, 7A, 8A and 8, including metal canopy attached to Block 7- Grade II.
 - Former Mustard Seed Drying Shed- Grade II.

Locally Listed Buildings

- 4.33 The following buildings are locally listed, and are proposed to be either be retained and repurposed for a range of flexible uses or repurposed for a range of flexible uses, including extension and/or alteration:
- Stable Cottages- early 20th Century group of farm buildings- proposed conversion to flexible uses (Class C3).
 - Carrow Works Factory, Riverside Elevation and adjoining 19th Century factory building- proposed conversion to flexible uses (Class C3 and/or Class E), including extension and alteration.

Demolition within the Bracondale Conservation Area

- 4.34 As set out on the Parameter Plan, Demolition Plan, a number of structures will be demolished to make way for the development proposed, none of which are included within the Statutory List, nor the Local List.
- 4.35 The demolition of these structures will allow the provision of a number of a new residential dwellings, residential apartments and commercial spaces, including significant public realm and landscaping works.

Landscaping Proposals

- 4.36 A detailed landscaping strategy has been formulated by Bowes and Wyer for the detailed components of the proposed development, those being for Coleman's Wharf, the area immediately surrounding the former Mustard Seed Dryer building and the ground including and surrounding Carrow Abbey.

The Outline Application Proposals

Demolition

- 4.37 Forming part of the outline consent sought, a number of buildings are to be demolished, to make way for the comprehensive redevelopment of the outline component of the site for a mixture of residential houses, apartments, including Build for Rent, and flexible Class C3 and/or C1 and/or C2 and/or Class E and/or F1 and/or F2 and/or Class B2 and/or Class B8 floorspace.

Development Proposed

- 4.38 As set out in Table 2 above, the outline component of the scheme currently seeks consent for up to 1,716 residential units and up to 9,005 sq.m of flexible range of uses, including a food store.
- 4.39 The outline proposals will be formulated against the Parameter Plans, Masterplan, Design Code, setting the development principles of the six site wide character areas, including the proposed landscape principles for each area.
- 4.40 The development of the outline component of the site will be guided by the Parameter Plans and a series of Design Codes, detailing indicative typologies, densities, and storey heights, informed by Heritage Townscape Visual Impact Assessments and guidance, to ensure that the significance and interest of historic and heritage assets found across the site are maintained and enhanced.
- 4.41 The Design and Access Statement, prepared by JTP Architects and Masterplanners, articulates in detail the conceptual and design development of the scheme in this respect.

Site Wide Considerations

Public Realm and Landscaping

- 4.42 The detailed landscaping proposals are contained within the Design and Access Statement, prepared by JTP Architects and the detailed drawings submitted in support of this hybrid planning application, prepared by Bowle Wyer.
- 4.43 This hybrid planning application proposes comprehensive public realm improvements across the whole site, which have been developed alongside key pedestrian and cyclist first highways considerations in respect of key gateways into the site, and from the site to areas across Norwich and beyond.
- 4.44 A Landscape Masterplan has been developed for the whole application site, broken down into a number of 'Character Areas' to reflect the corresponding architectural design and concepts for the site. These Character Areas as defined as follows:
- Coleman's Wharf;

- Mustard Quarter;
 - Mint Yard; and
 - The Abbey and Cottages.
- 4.45 Whereas public realm and landscaping proposals for the outline element of the proposed development will evolve as detailed design evolves, full details (forming part of the full component of this hybrid planning application) are provided for the key east/west route that runs through the site, crossing as it does the main character areas highlighted above. Within these areas, details of the public realm strategy for the key entrances to the site is formulated, those being at Coleman’s Wharf to the north west of the site, where a high-quality square is proposed, which in turn links to the central spine of the east/west route, at the Mustard Quarter.
- 4.46 Mustard Quarter then links to the eastern gateway to the site at Mint Yard, incorporating as it does a high-quality public square, with associated planting and water features.
- 4.47 As a whole, the three Character Areas have been developed to accentuate the site’s historical use and heritage, incorporating as they do, high-quality paving and other materials to accentuate the high-quality nature of the development proposed.
- 4.48 In addition, the key south to north linkages within the site, from the Carrow Abbey/ Scheduled Ancient Monument Grounds, to Coleman’s Wharf, Mustard Quarter and Mint Yard, have been carefully articulated with a detailed landscaping strategy for the Abbey and Cottages grounds.
- 4.49 Given the Ancient Scheduled Monument, the public realm and landscaping strategy in this area has been meticulously developed to ensure that the interest and character of the grounds remain intact, whilst ensuring that public and private space (associated with the residential dwellings proposed at the Carrow Abbey and former Dining Hall) can be provided and enjoyed by all.
- 4.50 In addition to key public realm improvements proposed, a comprehensive site wide tree planting and landscaping strategy is proposed, including gardens, woodland planting, formal planting, ornamental gardens, community gardens and urban orchards to cater for open space, residential amenity, public space and biodiversity creation and consideration.

Heritage, Townscape and Visual Impact Considerations

- 4.51 A Heritage, Townscape and Visual Assessment (HTVA), prepared by Icen Projects, has been undertaken to inform and support the proposals that are the subject of this hybrid planning application.
- 4.52 The HTVA comprises a thorough assessment of the site, including its history, the existing townscape environment, its built heritage and townscape and visual receptors, in order to articulate the likely effects that may arise as a consequence of the proposed development.

- 4.53 The scope, and especially the townscape and visual receptors tested, have been the subject of consultation, and agreement (including viewpoints) with Norwich City Council.
- 4.54 In addition, consultation has been undertaken with Historic England, culminating in a number of amendments to development proposed, including removal of development previously proposed within the grounds of the Scheduled Ancient Monument.
- 4.55 The assessments undertaken have as a consequence, considered the value, susceptibility to change and sensitivity of built heritage, townscape and visual receptors.
- 4.56 The HTVA has therefore considered all facets of the development proposed, including the demolition and construction effects; operational effects; built heritage (including setting considerations); the Scheduled Ancient Monument (Carrow Abbey and the Priory and grounds); and visual and townscape effects.
- 4.57 These assessments highlight the following, framed using the requisite terminology, as set out in the Environmental Statement (Environmental Impact Assessment) in terms of effects:

Built Heritage

- 4.58 The operational effects on built heritage receptors generally range from minor neutral to moderate beneficial. This is due to the existing and emerging character of the identified receptors, as well as the carefully considered, high-quality design of the proposed development.
- 4.59 In terms of the Carrow Abbey and the Priory, the nature of the works proposed to convert the Abbey to residential are such that the degree of intervention to the fabric is minimal. It is therefore likely, given the analysis contained within the HTVA, that even without a full viability assessment, residential use is likely to be the optimum viable use, thus generating a clear heritage benefit.
- 4.60 A moderate adverse effect has been identified overall for both Carrow Works and the Priory. In non-Environmental Impact Assessment terms, this would amount to less than substantial harm, that would be balanced against the benefits of the scheme overall.
- 4.61 On other instances where significant resultant effects have been identified in EIA terms, these are considered by Icen Projects as neutral or beneficial, and the heritage significance and setting is preserved.
- 4.62 When considered alongside cumulative schemes, there would be little change to the assessed operational effects. This is due to the self-contained nature of the site, and the proposed development.

Visual Impact

- 4.63 The visual effects of the proposed development have been assessed, with reference to the 40 views projected as Accurate Visual Representations (AVRs).

- 4.64 The list of views was agreed with Norwich City Council and Historic England during a scoping exercise in the lead up to the formulation of the HTVA.
- 4.65 Iceni Projects concludes that the proposed development would have either beneficial, neutral or negligible or no effect on identified viewpoints. Therefore, visual amenity would be maintained or enhanced by the proposed development.
- 4.66 In addition, there have been no adverse effects identified, demonstrating the area's capacity for change, the opportunities to enhance the visual amenity and townscape quality of the area, as well as the high-quality design of the proposed development.
- 4.67 It is also highlighted by Iceni Projects, that when considered alongside cumulative schemes, the effects are deemed neutral or beneficial.

Highways and Transportation

- 4.68 A Transport Assessment has been prepared by Entran and is submitted in support of this hybrid planning application. The Transport Assessment has and continues to evolve following pre-application with Norwich City Council and Norfolk County Council, as highway authority.
- 4.69 Given this, this transportation proposals may be subject of change during the determination of the hybrid planning application, and in light of this, a high-level summary is provided at this stage.
- 4.70 The Transport Assessment has been undertaken alongside a Transport Implementation Strategy which provides the opportunity to reduce dependence on travel by the private car, whilst seeking to influence travel to and from the application, rather than solely assessing its impact.
- 4.71 The movement strategy for the site has been developed with a strong focus and emphasis on national planning policy framework guidance, that being pedestrians and cycle first approach.
- 4.72 The internal network of the site has been developed around the Healthy Streets approach to reduce the dominance of vehicles and make the environment convenient for pedestrians and cyclists, to encourage these modes of transport.
- 4.73 Car parking and secure cycle provision are proposed alongside the public realm and landscape enhancements highlighted above.
- 4.74 The proposed development will be a low car scheme, resulting in one space per house and 0.2 spaces per apartment provision.
- 4.75 Given the reduced provision, a Car Club will be introduced on site to allow every household the opportunity to have access to a car for essential or other travel. Car parking for the mobility impaired will be provided. Electric Vehicle Charging points will be installed in accordance with current standards.
- 4.76 In terms of public transportation provision, three new bus stops are proposed within the site, ensuring that residents will live within 200m of a bus stop.

- 4.77 The potential for the new footbridge for pedestrians and cyclists, will reduce the travel time to Norwich Station, with its services to London and beyond.

Planning Obligations

- 4.78 Given the scale and complexity of the proposed development, it is expected that detailed discussions with Norwich City Council, will take place following the submission of this hybrid planning application. This process will include discussions surrounding affordable housing provision, subject to viability assessment, infrastructure provision within the site, and that considered viable to connect the application site with adjoining sites, highways and other associated infrastructure improvements/provision, alongside other CIL compliant obligations considered reasonable for the development proposed.
- 4.79 An Affordable Housing Statement, full list of Planning Obligations, alongside viability considerations will be submitted under separate cover.

5. Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.2 In light of this, the development proposed by this hybrid planning application should be determined against the relevant policies contained within the current adopted Development Plan for Norwich, comprising as it does the following:
- Norwich Local Plan, 2014;
 - The Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014;
 - Site Allocations and Site-specific Policies Local Plan, 2014;
 - Development Management Policies Local Plan, 2014; and
 - Norwich Local Plan Policies Map, 2014.
- 5.3 In addition, a number of adopted Supplementary Planning Documents are considered of relevance to the proposed development, those being:
- Landscape and Trees, 2016;
 - Heritage Interpretation, 2015;
 - Open Space and Play, 2015;
 - Affordable Housing, 2019; and
 - Main Town Centre Uses and Retail Frontage, 2014.
- 5.4 In addition to the above, Norwich City Council has been working with Broadland District Council, Norfolk County Council and South Norfolk District Council to prepare the Greater Norwich Local Plan (GNLP), which once adopted, will replace the aforementioned adopted Development Plan documents.
- 5.5 The preparation of the GNLP is at progressed stages, with a number of matters and topics having been the subject of Examination in Public. In light of this, it is considered that the policies contained therein may be at the stage of adoption at the time the City Council formally determines the proposals that are the subject of this hybrid planning application. At the very least, it is considered that the emerging GNLP will carry sufficient weight to form a material consideration in the determination of the hybrid planning application.
- 5.6 Given this, detailed reference is made to the GNLP for the purposes of this hybrid planning application.

- 5.7 The National Planning Policy Framework, 2021 is also of relevance to the determination of these proposals, and as such, the key objectives of the framework are also highlighted within this section.

National Planning Policy Framework

- 5.8 The national planning policy context is set out in the National Planning Policy Framework (NPPF) as revised in July 2021.

Achieving Sustainable Development

- 5.9 At paragraph 8 the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective- to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective- to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe environment, with accessible services and open spaces that reflect current and future needs and support communities 'health, social and cultural well-being; and

c) an environmental objective- to protect and enhance our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.10 The NPPF does not change the statutory status of the development plan as a starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless material considerations indicate otherwise (paragraphs 11 and 12).
- 5.11 At the heart of the NPPF is the presumption in favour of sustainable development, decision takers may continue to give full weight to relevant policies adopted since 2004 (in development plan documents adopted in accordance with the Planning and Compulsory Purchase Act 2004) even if there is limited degree of conflict in the NPPF.
- 5.12 The presumption in favour of sustainable development, should be seen as a golden thread running through both plan-making and decision-taking (paragraph 11). For decision-taking, this means:
- c) Approving development proposals that accord with the development plan without delay; and

d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless....:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Decision Making

- 5.13 The NPPG at paragraph 39 states that: early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.
- 5.14 Moreover, paragraph 46 encourages applicants and the local planning authority the potential for voluntary planning performance agreements, where this might achieve a faster and more effective application process.
- 5.15 In relation to the determination of planning applications, paragraph 47 states that: planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on application should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
- 5.16 Where the local planning authority in question is embarking on the preparation of a new Development Plan, paragraph 48 states that: Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to the Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 5.17 In relation to planning obligations, paragraph 57 states that: these must only be sought where they meet all of the following tests:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- 5.18 Moreover, paragraph 58 states that: where up-to-date policies have set out the contributions expected from development, planning applications that comply with

them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force.

Delivering a sufficient supply of homes

- 5.19 Section 5 of the NPPF states at paragraph 60, that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.20 In relation to affordable housing, paragraph 65 states that: where major development involving the provision of housing is proposed, planning decision should expect at least 10% of the total number of homes to be available for affordable housing ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:
- a) provides solely Build for Rent homes;
 - b) provides specialist accommodation for a group of people with specific needs (such as purpose built-accommodation for the elderly or students)...

Building a strong, competitive economy

- 5.21 At Section 6, paragraph 81, the NPPF states that: planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...

Promoting healthy and safe communities

- 5.22 At paragraph 92, the NPPF states that: planning decisions should aim to achieve healthy, inclusive and safe places and at paragraph 93: to provide the social, recreational and cultural facilities and services the community needs.

Promoting sustainable transport

- 5.23 The NPPF at Section 9 states that at paragraph 104 that: transport issues should be considered from the earliest stages of development proposals, so that:
- a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised, for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account- including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

5.24 Paragraph 110 states that: in assessing sites for specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be- or have been- taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

5.25 Development should therefore only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, can be cost effectively mitigated to an acceptable degree (paragraph 111).

5.26 Given the context above, paragraph 112 states that: applications should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, and second, so far as possible, to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to the local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emissions vehicles in safe, accessible and convenient locations.

- 5.27 All developments that will generate significant amounts of movements should be required to provide a travel plan, and applications should be supported by a transport assessment so that the likely impacts of the proposal can be assessed (paragraph 113).

Making effective use of land

- 5.28 The NPPF at paragraph 119 states that: decisions should promote an effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.

- 5.29 To this end paragraph 120 states that decisions should:

a) encourage multiple benefits from urban land, including through mixed use schemes and take opportunities...

c) given substantial weight to the value of using suitable brownfield land within settlements for homes...

d) promote and support the development of under-utilised land and buildings..

- 5.30 In terms of densities, paragraph 124 states that: decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services- both existing and proposed- as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.

- 5.31 The NPPF also states, at paragraph 125, that: area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential for each site.

Achieving well-designed places

- 5.32 At Section 12, the NPPF requires that planning policies and decisions should ensure that developments are: c) sympathetic to local character and history, including the surrounding built environment and landscape setting...(paragraph 130).

Meeting the challenge of climate change, flooding and coastal change

- 5.33 At Section 14, the NPPF provides the framework for 'Meeting the challenge of climate change, flooding and coastal change. New development should be planned in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change...(paragraph 154).

Conserving and enhancing the natural environment

- 5.34 The aim of Section 15 of the NPPF is to ensure that decisions should contribute to and enhance the natural and local environment.
- 5.35 In relation to ground conditions and pollution, paragraph 183 a) seeks to ensure that the site is suitable for its proposed use taking account of grounds conditions and risks arising from land instability and contamination.
- 5.36 Moreover, at paragraph 185, the NPPF requires that: decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative) of pollution on health, living conditions and the natural environment.

Conserving and enhancing the historic environment

- 5.37 Chapter 16 'Conserving and enhancing the historic environment' sets out how applications should consider any heritage assets affected by the proposed development.

Norwich Local Plan, 2014

- 5.38 The adopted Development Plan for Norwich comprises three documents, those being the Joint Core Strategy, the Norwich Development Management Policies Plan and the Site Specific Policies and Site Allocations Plan.

Site Designations

- 5.39 The Norwich Local Plan Policies Map- South Inset, 2014, confirms that the Site benefits from the following designations:
- Employment Area;
 - Allocated Site (Employment);
 - Flood Risk Zone 2- North Eastern Section of the Site only; and
 - Area of Main Archaeological Interest.

Joint Core Strategy, 2014

- 5.40 The policies of relevance to the Site and the Proposed Development, as contained within the Joint Core Strategy are listed in the table below:

Policy No.	Policy Description
1.	Addressing climate change and protecting environmental assets
2.	Promoting good design
3.	Energy and water
4.	Housing delivery
5.	The economy
7.	Supporting Communities

Development Management Policies, Local Plan, 2014

- 5.41 The policies of relevance to the Site and the Proposed Development, as contained within the Development Management Policies, Local Plan are listed in the table below.

Policy No.	Policy Description
DM1	Sustainable development principles for Norwich
DM2	Ensuring satisfactory living and working conditions
DM3	Delivering high quality design
DM5	Planning effectively for flood resilience
DM7	Trees and Development
DM8	Planning effectively for open space and recreation
DM9	Safeguarding Norwich's heritage
DM11	Protecting against environmental hazards
DM12	Ensuring well-planning housing development

DM16	Supporting the needs of business
DM18	Promoting and supporting centres
DM28	Encouraging sustainable travel
DM30	Access and highway safety
DM31	Car parking and servicing
DM32	Encouraging Car Free and Low Car Housing
DM33	Planning obligations and development viability

Emerging Greater Norwich Local Plan (GNLP)

5.42 The Emerging Greater Norwich Local Plan sets out regional plans for growth of Greater Norwich, including Norwich City. Part of the vision promotes the growth of mixed, inclusive, resilient and sustainable communities, so that they are well integrated with the existing communities and will be safe and attractive places to live. People of all ages will have good access to services and facilities including schools, health care, shops, leisure and community facilities and libraries – which will in turn reduce the need to travel. Relevant policies include:

Policy 1: The sustainable growth strategy

5.43 Sustainable development and inclusive growth are supported by delivery of the following between 2018 and 2038:

- to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes;
- to aid delivery of 33,000 additional jobs and support key economic sectors, around 360 hectares of employment land is allocated, and employment opportunities are promoted at the local level;
- supporting infrastructure will be provided in line with policies 2 and 4;
- environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered.

Policy 2: Sustainable Communities

5.44 Development must be high quality, contributing to delivering inclusive growth in mixed, resilient and sustainable communities, to enhancing the environment, and to mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets. To achieve this, development proposals are required, as appropriate, to:

1. Ensure safe, convenient and sustainable access to on site and local services and facilities including schools, health care, shops, recreation/ leisure/community/faith facilities and libraries;

2. Make provision for delivery of new and changing technologies (including broadband, fibre optic networks, telecommunications, construction methods and electric vehicles);

3. Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings, having regard to relevant green infrastructure strategies and delivery plans;

4. Make efficient use of land with densities dependent on-site characteristics, with higher densities and car free housing in the most sustainably accessible locations in Norwich. Indicative minimum net densities are 25 dwellings per hectare across the plan area and 40 in Norwich.

5. Respect, protect and enhance local character and aesthetic quality (including landscape, townscape, and the historic environment), taking account of landscape or historic character assessments, design guides and codes, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads;

6. Provide safe and suitable access for all users, manage travel demand and promote public transport and active travel within a clearly legible public realm including public art where appropriate, with layouts that encourage walking and cycling, whilst also integrating parking in a manner that does not dominate the streetscape and providing a high standard of amenity through planting and the careful choice of materials;

7. Create inclusive, resilient and safe communities in which people of all ages have good access to services and local job opportunities, can interact socially, be independent and have the opportunity for healthy and active lifestyles;

8. Be resource efficient, support sustainable waste management, reduce overheating, protect air quality, minimise pollution and take account of ground conditions;

9. Support efficient water management. Flood risk should be minimised, including avoiding inappropriate development in areas at significant risk of flooding, reducing the causes and impacts of flooding, supporting a catchment approach to water management and using sustainable drainage. Development must protect water quality, both surface and groundwater, and be water efficient. To achieve the latter:

- o Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard; and

- o Non-housing development will meet the BREEAM “Very Good” water efficiency standard, or any equivalent successor.

5.45 If the potential to set more demanding standards locally is established by the Government, the highest potential standard will be applied in Greater Norwich.

10. Minimise energy demand through the design and orientation of development and maximise the use of sustainable energy, local energy networks and battery storage to assist growth delivery. This will include:

o All new development will provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016); and

o Appropriate non-housing development of 500 square metres or above will meet the BREEAM “Very Good” energy efficiency standard, or any equivalent successor; except where a lower provision is justified because the requirement would make the development unviable.

5.46 To assist this broad-based approach:

i. Planning applications for major developments will be required to be accompanied by a Sustainability Statement (including Health Impact Assessments as appropriate) showing how development will support the above requirements, with housing development taking account of the National Design Guide (and any subsequent related publications) and optionally making use of tools such as Building for a Healthy Life (or any successor). Other developments will meet the policy requirements as appropriate dependent on site characteristics and proposed uses. Flood risk assessments will be provided separately as required by Government guidance.

ii. Master-planning using a recognised community engagement process will be encouraged on larger sites and particularly for proposed developments of 200 dwellings or 20,000 square metres plus.

iii. Delivery plans are required with planning applications for 100 dwellings plus to set out the timing of the delivery of developments. Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities may make use, where necessary, of their legal powers to bring about strategically significant development, including compulsory purchase. In considering the use of such powers regard will be had to any change of circumstances that might affect delivery, particularly economic factors.

iv. Potential applicants for planning permission for major developments are advised to contact Anglian Water Services in the early stages of producing a development scheme in order to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network. The provision of capacity could affect the timing of development. In locations where there are known to be capacity issues the local authority will expect this engagement to have taken place and for it to be demonstrated that adequate capacity will be available to serve the development (see Appendix 1 Infrastructure Requirements for currently known locations with capacity issues)”.

Policy 3: Environmental protection and enhancement

5.47 Policy 3 states that the Built and Historic Environment The development strategy of the plan and the sites proposed for development reflect the area’s settlement structure of the city, towns and villages, retaining the separate identities of individual settlements. Development proposals will be required to conserve and enhance the built and historic environment through:

- being designed to create a distinct sense of place and enhance local character taking account of local design and other guidance, undertaking a heritage impact assessment if significant impacts might arise, and providing measures such as heritage interpretation to further the understanding of local heritage issues;
- avoiding harm to designated and non-designated heritage assets and historic character, unless there are overriding benefits from the development that outweigh that harm or loss and the harm has been minimised;
- providing a continued or new use for heritage assets whilst retaining their historic significance.

5.48 In applying the above, regard will be given to the level of importance of the heritage asset.

Policy 5: Homes

5.49 The policy states that: Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs.

5.50 The policy requires major residential development to provide:

- at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, or where
 - a) the site is allocated in a Neighbourhood Plan for a different percentage of affordable housing, or
 - b) for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage;
- affordable housing on-site except where exceptional circumstances justify off-site provision;
- a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;
- affordable housing of at least equivalent quality to the market homes on-site.

5.51 In addition to the above, the policy requires that all housing development must meet the Government's Nationally Described Space Standard for internal space.

5.52 In terms of Accessible and Specialist Housing development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use. Irrespective of C2 or C3 use class classification, specialist older people's housing will provide 33% affordable housing or 28% in the city centre.

5.53 Proposals are particularly encouraged where Norfolk County Council identifies a strategic need for extra care housing.

5.54 To meet changing needs by providing accessible and adaptable homes, proposals for major housing development are required to provide at least 20% of homes to the Building Regulation M4(2)[1] standard or any successor.

Policy 6: The economy

5.55 Policy 6 requires, *inter alia*, that:

1. Sufficient employment land is allocated in accessible locations to meet identified need and provide for choice. Opportunities for sustainable access to sites should be maximised through development proposals and infrastructure investment.

Policy 7.1: East Norwich

5.56 Policy 7.1 provides the policy framework for the East Norwich Strategy Regeneration Area (ENSRA), which includes the site that is the subject of this hybrid planning application (Carrow Works).

5.57 The ENSRA is comprised of the following sites:

- Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former Gurney site at Trowse in South Norfolk;
- Land at Carrow Works, Norwich;
- Utilities Site, Norwich; and
- Land in front of ATB Laurence Scott.

5.58 The allocation at Land at Carrow Works, also includes Carrow House and associated car parking, which is under the ownership of Norwich City Council. That site is not included within the application boundary for this hybrid planning application.

5.59 In light of the above, the Carrow Works site, as a whole, development must also achieve the following site-specific requirements:

5.60 At part 21. Proposals will include the conservation and long-term management of the scheduled monument and listed buildings on the site and provide a suitable setting for designated heritage assets affected by the proposals on and off site. Proposals, which seek to convert, alter or demolish 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;

5.61 At part 22. Proposals will be required to adopt and implement a strategy of heritage interpretation relating to both the heritage assets of the site, and the use(s) of the site.

5.62 At part 23. Deliver the following key infrastructure in accordance with phasing plans agreed through the SPD:

- a) Provision of a high quality east-west cycle/pedestrian route to connect the access on King Street to the railway underpass.
- b) Enhancement works to the railway underpass.
- c) Provision of unconstrained access to the railway underpass.
- d) Provision of a cycle/pedestrian bridge over the River Wensum (linking to Carrow Road).
- e) Provision of key road infrastructure across the Carrow Works site (built to adoptable standards and able to accommodate public transport).
- f) Provision of a second point of access to King Street the detail of which to be determined through a Transport Assessment.
- g) Provision of high quality pedestrian/cycle routes to both the city centre and Bracondale.
- h) Off site improvements to the highway network including junction enhancements and improved crossing facilities.
- i) Safe and convenient off road cycle route through the Carrow Works site connecting Martineau Lane roundabout to King Street.
- j) Provision of serviced site for a two form entry primary school.
- k) Provision of land for a health facility sufficient to serve the East Norwich development as a whole.
- l) Provision of a community retail centre to serve the development and in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means.

Supplementary Planning Documents

- 5.63 Supplementary planning documents (SPDs) are produced by the Norwich City Council/Partnership to give more ‘supplementary’ detail about how particular Local Plan policies should be interpreted or applied in practice and provide further information to guide the Council’s planning decisions on planning applications. The government has made clear that SPDs can only be used as a means of speeding up the delivery of sustainable development and should not impose additional unreasonable cost burdens on developers.

East Norwich Strategic Regeneration Area Supplementary Planning Document, May 2022

- 5.64 The East Norwich Strategic Regeneration Area, Supplementary Planning Document, was endorsed by the Norwich City Council Cabinet in June 2022. The SPD has no material weight in the determination of planning applications at present, although it is anticipated that formal consultation will be undertaken in the winter, and once adopted in 2023, it is considered that the SPD will form a material consideration in the determination of relevant planning applications.
- 5.65 The intention of the SPD is to guide redevelopment within the regeneration area, which includes the Carrow Works site. A more detailed assessment of this application against the SPD will be undertaken at the point whereby the SPD has been developed further, and has been the subject of formal statutory consultation.

6. Planning Assessment

Overview of Assessment Framework

- 6.1 This section considers the proposals in the context and against the planning policy framework set out at Section 5.
- 6.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.3 The National Planning Policy Framework (NPPF) provides the framework for the determination of planning applications, including the emphasis provided for pre-application engagement and front-loading.
- 6.4 In addition, and as highlighted in the preceding section, planning applications must be determined against the development plan. In this instance, the currently adopted development plan for Norwich comprises the Norwich Local Plan, 2014; the Joint Core Strategy for Broadland, Norwich and South Norfolk, 2015; the Site Allocations and Site-Specific Policies Local Plan, 2014; the Development Management Policies Local Plan, 2014; and the Norwich Local Plan Policies Map, 2014.
- 6.5 However, and given that Norwich City Council has announced a delay in the determination of planning applications for around a period of 18 months due to the nutrient neutrality issue, it is considered reasonable and practicable to assess the proposals that are the subject of this hybrid planning application against the emerging Greater Norwich Local Plan (GNLP).
- 6.6 Paragraph 48 of the NPPF endorses this approach, especially given the advanced stage of the emerging GNLP, having been the subject of several rounds of public consultation and an Examination in Public. It is anticipated that given that determination of this application may be delayed by up to 18 months, it is reasonable to expect that the GNLP may be adopted, alongside supporting guidance in the form of the East Norwich Strategic Regeneration Area Supplementary Planning Document (SPD), expanding as it does, on the site specific policies pertaining the site.

Pre-Application and Stakeholder Engagement

- 6.7 In accordance with paragraphs 39 to 45 of the NPPF, the applicant has undertaken extensive engagement with key stakeholders since December 2021 in line with a Planning Performance Agreement with Norwich City Council, this approach is fully endorsed by paragraph 46 of the NPPF.
- 6.8 In addition consultation was undertaken with the local community following a public exhibition event hosted on 23rd and 24th June 2022.
- 6.9 The proposed development that is the subject of this hybrid planning application has been informed, where possible, by the feedback received during this process, including the following amendments made to the proposed development in response:

- The inclusion of a number of further buildings including and in close proximity to heritage assets within the full element of the hybrid planning application;
- The removal of development previously proposed within the area of the Scheduled Ancient Monument, with the exception of the proposed residential dwellings on the footprint of the former Dining Hall;
- Reduction of building heights in the areas closest to the Abbey;
- The creation of more open views to the Abbey when approaching from the south;
- The inclusion of flexible ground floor uses along the east/west route through the site to assist in creating a key spine;
- Detailed development of the masterplan approach for the site, which aligns much closer to the emerging East Norwich Strategic Regeneration Area, Supplementary Planning Document; and
- Greater articulation and design development of the pedestrian and cycle first approach, including potential linkages to surrounding sites and areas.

6.10 Stakeholder feedback has also been received regarding areas of the proposed development that require further consideration during the hybrid planning application determination period, which may inevitably result in amendments to the scheme during that process.

6.11 Full details of all consultation undertaken can be found at Section 3 of this Statement, and the Statement of Community Involvement, prepared by Marengo Communications.

Delivering Sustainable Development

6.12 When considered against the Government's Environmental Objective (NPPF paragraph 8c) for achieving sustainable development, the proposals seek to make the most effective use of land, whilst helping biodiversity through the extensive public realm and landscaping works incorporated into the masterplan for the site.

Principle of Development, securing New Homes and Economic Growth

6.13 When considered against the Government's aims for achieving sustainable development through economic and social objectives (NPPF paragraph 8 a and b), the scheme will:

a) Contribute to building a strong and competitive economy within Norwich through a range of flexible commercial uses and floorspace proposed; and

b) Assist in supporting a strong and healthy community through the provision of 1,859 residential units, ranging from studio, 1, 2 bedroom apartments and a range of 1 to 5 bedroom houses.

- 6.14 The provision of residential units fully endorses the aims of Section 5 of the NPPF which seeks to significantly boosting the supply of homes, including those for families.
- 6.15 Additionally, the principle of development fully embraces the Government's aims of 'making efficient use of land' though the provision of homes and encouraging mixture of uses and the benefits this brings, especially the use of brownfield and underutilised land as set out at Section 11 of the NPPF.
- 6.16 The proposed development is considered to also fully endorse the aims of the emerging GNLP (Policy 1), where the number of homes proposed will assist in delivering the 40,550 new homes and 33,000 additional jobs throughout the plan period (up to 3038).
- 6.17 The proposed development will also seek to make a commensurate contribution towards supporting infrastructure to facilitate the regeneration of the East Norwich Strategic Regeneration Area.
- 6.18 Furthermore, this hybrid planning application has evolved through extensive pre-application engagement with key stakeholders, culminating in a broadly compliant and complementary development proposal as that envisaged by Policy 7.1 of the emerging GNLP and the emerging masterplan for the site and wider East Norwich Strategic Regeneration Area, as set out in the emerging SPD.

Delivering Sustainable Communities

- 6.19 Given the quantum and mix of residential dwellings proposed, it is considered that the proposed development fully endorses the aims and aspirations of Policy 2: Sustainable Communities and the guidance contained in section 5 of the NPPF.
- 6.20 The pedestrian, cycle first approach to highways considerations will ensure safe, convenient and sustainable access to and throughout the site, including through the provision of an internal bus route through the site. This approach also endorses the requirements of part 6 of the policy.
- 6.21 The site also has the potential to provide for changing technologies, as detailed design develops in accordance with Policy 2 (2).
- 6.22 The comprehensive public realm and landscaping strategy proposed for the site will seek to ensure that the aims of part 3 of the policy is achieved.
- 6.23 In respect of densities and making the most efficient use of land, as required by part 4, the densities proposed across the site exceed the 40 dwellings per hectare advocated for Norwich. Given the considerable constraints posed by infrastructure and heritage considerations, and the sites incumbent density, a mean density of 177 dwellings per hectare is proposed. This density assists in achieving the broad housing numbers advocated by the emerging SPD for East Norwich.
- 6.24 A fundamental facet of the development proposals is the extent of designated and other heritage assets found across the site. The development proposal has been

formulate to ensure that these assets are respected and protected as required by part 5.

- 6.25 The suite of environmental and other supporting assessments submitted in support of the hybrid planning application, demonstrate the endeavours made to meeting parts 8 to 10 of the policy.
- 6.26 In relation to the delivery of homes, the proposed residential units have been designed to conform with the Nationally Described Standards, as required by Policy 5 of the emerging GNLP.
- 6.27 Moreover, the units proposed will endeavour to be accessible and adaptable, with the aim of achieving 20% of homes to Building Regulation M4 (2)[1] standards.
- 6.28 Given the size and complexity of the site, the applicant will seek to provide a percentage of the residential units proposed as affordable housing units. The precise percentage will be the subject of discussions with Norwich City Council during the determination period of this hybrid planning application, which may include a detailed viability assessment, in line with Policy 5.

East Norwich

- 6.29 As highlighted above, this hybrid planning application is proposed against the backdrop of the emerging policy framework for East Norwich. Policy 7.1 of the emerging GNLP provides the framework for the East Norwich Strategic Area (ENSRA), within which, the application site forms a significant component.
- 6.30 The development has sought to, and will continue to seek the delivery of the following key infrastructure requirements, subject to overall site viability considerations (as set out in Policy 5 and as permitted by paragraph 58 of the NPPF):
- Explore the potential to provide access to the railway underpass;
 - Explore the potential for a cycle/pedestrian bridge over the River Wensum, which is and will continue to be the subject of negotiations with landowners on the opposite side of the river to the application site;
 - Provision of key road infrastructure and secondary access point to the site, as explored and demonstrated by the Transport Assessment, submitted in support of this hybrid planning application;
 - Exploring the potential to provide or enhance existing pedestrian and cycle routes to both the city centre and Bracondale and within the site;
 - Exploring the potential, given the extensive site constraints, viability considerations, confirmation of need and commensurate site-specific contributions by all sites within the ENSRA for providing a two-form entry primary school, and a health facility, whilst having regards to the Planning Obligations tests, as set out at paragraph 57 of the NPPF; and

- Exploring the potential to contribute towards the provision of a community retail centre to serve the development of the ENSRA.

Economic Growth and Public Benefits

- 6.31 As highlighted above and when considered against the Government's aims for securing sustainable development as set out in paragraph 8 of the NPPF, the proposals fully endorse these aims by assisting in building a strong, responsive and competitive economy through the provision of a mixture of commercial uses, with the ensuing potential for job creation.
- 6.32 The residential component of the proposed development has the potential to generate economically active residents of working age, which in turn will contribute to the local and wider economy.
- 6.33 In relation to support of a strong, vibrant and healthy community the provision of a mixture of private sale and build for rent accommodation totally 1,859 units is considered to achieve this.
- 6.34 Moreover, the proposed development is considered to embrace the emerging GNL Policy 6 requirements of promoting the economy and providing opportunities for employment in accessible locations.
- 6.35 Additional public benefits when considering the heritage and townscape visual impact context, include the contribution the site will make to achieving the regeneration of East Norwich as set out in Policy 7.1 and the emerging ENSRA SPD.

Retail Capacity Considerations

- 6.36 The proposed development has the potential to provide 12,356 sq.m of retail and leisure floorspace. Given the site is located in an 'edge of centre' location, an assessment to satisfy the sequential approach outlined in the NPPF and the adopted Norwich Local Plan is required.
- 6.37 Mark Alexander Planning has undertaken a Retail Statement, which is submitted in support of this hybrid planning application. The Retail Statement has applied the sequential approach, which demonstrates that, within the catchment area there are no suitable or available sites located within a sequentially preferable location, mainly due to the availability of sites that meet the assessment criteria.
- 6.38 The assessment concludes, that notwithstanding some impact on existing centres, this would be outweighed by the retail and leisure benefits derived from the development coming forward.

Design and Landscaping Considerations

- 6.39 The proposed development for the full element, largely comprises the conversion of existing historical and heritage assets, with the exception of the development of high-quality houses that garner and respect the setting of the Carrow Abbey.

- 6.40 The proposed public realm and landscaping approach is seeking a high-quality finish to reflect the rich mix of heritage assets.
- 6.41 It is considered that the proposed development fully embraces the NPPF aspirations in terms of delivering good design, whilst endorsing the aspirations of the merging Policy 7.1 of the GNLP.
- 6.42 Whereas appearance and landscaping is reserved for future considerations as part of the outline component of the hybrid planning application, a full and comprehensive suite of documentation is submitted in support, including Design Codes, setting out as they do, the high-quality nature of development envisaged.
- 6.43 This approach is also fully endorsed by the NPPF.

Highways and Transportation

- 6.44 When considered against the NPPF requirements for promoting healthy and safe communities, it is considered that the pedestrian and cycle first approach advocated by the masterplan, as supported by the Transport Assessment fully endorses the Government's aspirations.
- 6.45 When considering any potential impacts of the proposed development on the transport network, the Transport Assessment concludes that some queues to pre-stressed junctions during the peak periods, it is considered that mitigation measures comprising of off-site infrastructure improvements to promote sustainable modes of transportation are the most appropriate strategy.

Planning Obligations and Affordable Housing

- 6.46 The Hybrid planning application is supported by a Planning Obligations and Affordable Housing Statement, which has been prepared alongside the Financial Viability Report, also submitted in support of the Proposed Development.
- 6.47 The Financial Viability Report will be the subject of an independent review on behalf of Norwich City Council, following which, the obligations and any affordable housing provision for the Site will be fully articulated.

7. Summary and Conclusions

- 7.1 This Planning Statement is submitted in support of a hybrid planning application (part full, part outline) for the comprehensive redevelopment of the Carrow Works site, Norwich.
- 7.2 The proposed development has been the subject of extensive stakeholder engagement since December 2021, including a series of pre-application meetings with officers of Norwich City Council as part of an agreed Planning Performance Agreement, allowing the proposed development to evolve throughout the process.
- 7.3 A public exhibition event was also undertaken on 23rd and 24th June 2022, where the local community and other interested parties were invited to view the proposed development and provide feedback. A total of 51 interested individuals attended the exhibition, with the majority of attendees expressing support for the proposed development. An overview of the feedback received is contained within the Statement of Community Involvement.
- 7.4 The hybrid planning application proposes 1,859 residential units, comprising a mix of houses and apartments for a range of needs, including market sale and build for rent.
- 7.5 The residential component of the proposed development will be delivered through a combination of new build elements and through the conversion of existing designated and non-designated heritage assets on the site.
- 7.6 Alongside this, a healthy mix and range of flexible uses is proposed across the site, ranging from Class E, F1, F2, C2, C3, B2 and B8 either in the form of conversion of existing buildings or as part of the new build blocks proposed.
- 7.7 The aforementioned land uses are framed within a pedestrian and cycle first, public realm orientated development that seeks to harness the east to west route at the north of the Carrow Abbey grounds to provide integral connections to Norwich City centre to the west and to the Broads and beyond to the east. This route will comprise a number of character areas, comprising high-quality public realm and more importantly a new high quality residential led mixed-use development and quarter for Norwich. In turn it is reasonable to expect that the development of the site on this basis will act as a catalyst for the development of the remainder of the East Norwich Strategic Regeneration Area (ENSRA).
- 7.8 The proposed development seeks to garner the historical access and internal road and pedestrian access to the site, to ensure efficient delivery of development that minimises extensive infrastructure works.
- 7.9 In relation to car parking, the proposed development seeks to secure the most sustainable development possible, with the starting point being the promotion and facilitation of pedestrian and cycle access first. Alongside this, bus routes will feed into the site, to ensure that residents are in close proximity to bus services that service the main destinations in Norwich.

- 7.10 In light of this, this proposal seeks to provide a reduced car parking provision against adopted standards, alongside a healthy provision of electric charging points.
- 7.11 Given the site's rich history and heritage, including a number of listed, locally listed buildings and a Scheduled Ancient Monument, the proposed development is supported by Heritage, Townscape and Visual Assessment, alongside a full Environmental Statement. These assessments have guided the form of development proposed, to ensure that the high-density elements of the scheme do not detract from the significance of the heritage assets contained therein.
- 7.12 Any harm caused to those assets is considered to be outweighed by the significant public benefits that will ensue by the proposed development, including, but not limited to, bringing back into use the site, assistance in delivering the ENSRA vision, the creation of new jobs, and the repurposing and conservation of existing heritage assets on the site. The full range of public benefits are outlined within the Socio Economic Chapter of the Environmental Statement.

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