

# Greater Norwich Local Plan

## Regulation 18 Draft Plan Consultation

### Response Form

Thank you for responding to the Regulation 18 Draft Plan Consultation on the emerging Greater Norwich Local Plan.

The current consultation runs from. **29<sup>th</sup> January to 16<sup>th</sup> March 2020.**

It covers the **Strategy and Site Allocations**. We need to get views on these documents to help us draw up the version of the plan which will be submitted to the Planning Inspectorate.

When commenting on a policy or site, please include the site reference(s) in your comments.

If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the consultation on new, revised and small sites.

Consultation documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk). There are also supporting documents which provide information on our policies and sites which may help you to make your comments.

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

## **Submitting your Response Form**

Responses should be submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or completed hard copy forms should be sent to:

*Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX*

**All submissions should be made no later than 5pm on  
Monday 16<sup>th</sup> March 2020.**

<b>1a. Contact Details</b>	
Title	Miss
First Name	Helen
Last Name	Adcock
Job Title (where relevant)	Director
Organisation (where relevant)	CODE Development Planners
Address	17 Rosemary House Lanwades Business Park Kentford
Post Code	CB8 7PN
Telephone Number	
Email Address	

<b>1b. I am...</b>	
Owner of the site <input type="checkbox"/>	Parish/Town Council <input type="checkbox"/>
Developer <input type="checkbox"/>	Community Group <input type="checkbox"/>
Land Agent <input type="checkbox"/>	Local Resident <input type="checkbox"/>
Planning Consultant <input checked="" type="checkbox"/>	Registered Social Landlord <input type="checkbox"/>
Other (please specify):	

<b>1c. Client/Landowner Details</b> (if different from question 1a)	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Jarrold & Sons Ltd
Address	c/o CODE Development Planners
Post Code	
Telephone Number	
Email Address	

**Please make your comments below. You can comment on more than one policy or site on this form. Please clearly state the reference number of the policy or site your comments refer to.**

<b>Policy or site reference</b>	<b>Comments</b>
GNLPO409R	<p><b>1 Introduction</b></p> <p>1.1 These representations are made on behalf of Jarrold &amp; Sons in respect of site GNLPO409R land at Barrack Street/Whitefriars. Previous representations were submitted by Savills on behalf of both Hill Residential Ltd and Jarrold &amp; Sons in March 2018. Those earlier representations contended that the area currently identified as GNLPO409R be included within the Greater Norwich Local Plan (GNLP) as two separate allocations with the areas shown on drawings 8436-FM-DR-2000-A00 and 8436-FM-DR-2001-A00. Jarrold &amp; Sons contend that a single allocation as set out under GNLPO409R is unsound for the reasons set out in this representation.</p> <p><b>2 Background</b></p> <p>2.1 Jarrold &amp; Sons owns land south of Barrack Street and north of the River Wensum stretching from Whitefriars on its western</p>

	<p>boundary to and including the health and fitness club (currently occupied by Nuffield Health) at its eastern boundary.</p> <p>2.2 The undeveloped land within Jarrold &amp; Sons ownership is considered to be a key opportunity to redevelop a brownfield site within Norwich.</p> <p>2.3 Jarrold &amp; Sons has worked tirelessly over many years to attract inward investment into this part of the city. Completion of buildings between St James Mill and Whitefriars (1 St James Court and Carmelite House) fulfilled Jarrold's first office led investment objective. The next phase of Jarrold's redevelopment strategy required a package of elements to create a unique selling point in order to attract office occupiers to this area of the city. The concept of offices on the river frontage, views to Norwich Cathedral, links via a new bridge (the purpose built and forward funded Jarrold Bridge) and car parking, all contribute to the unique selling point. These have led to the construction and occupation of Kingfisher House and Dragonfly House adjacent to the river in the south east of the wider site and 3 St James Court adjacent to the Puppet Theatre in the north west of the wider site.</p> <p><b>3 Status of latest planning permissions for areas within proposed allocation GNLP0409R</b></p> <p>3.1 <b>18/01286/F</b> - Demolition of existing buildings and structures; erection of 218 dwellings; conversion, refurbishment and extension of two Grade II listed cottages, erection of 310sqm of commercial floorspace (Class A1-A5 use) and 152sqm of museum floorspace (D1 use), with associated works was approved on 4 September 2019 (full planning permission).</p> <p>3.2 Planning permission 18/01286/F and the associated s106 provides for 10% affordable housing (of which 15% shared ownership and 85% affordable rent). There is nothing within the documents associated with the planning permission which commits the undeveloped land within Jarrold &amp; Sons ownership, (identified within proposed allocation GNLP0409R) to provision of affordable housing in excess of the percentages set out in proposed policy 5 of the GNLP (28% for sites in Norwich city centre).</p> <p>3.3 In the intervening period since 4 September 2019, Hill Residential has lawfully commenced development and by the date the GNLP is anticipated to be examined by an inspector (November/December 2021) the site will be close to completion and by the time the GNLP is anticipated to be adopted (August/September 2022) the site will be fully completed.</p> <p>3.4 <b>08/00538/RM</b> - Part Condition 2: (plots F1 and F2) layout, scale, appearance and landscaping (including 2c: materials; part 2d: car parking; 2h: typical doors and windows) for 8,079sqm office space (B1) comprising 198sqm of ancillary retail space (reserved matters application in respect of outline consent 06/00724/F) was approved on 5 September 2008.</p> <p>3.5 Correspondence between Norwich City Council (NCC) and the then agents for the proposals for plots F1 and F2 establish that lawful commencement has taken place and therefore permission is in perpetuity. However, some years have passed since and whilst Jarrold &amp; Sons has been actively marketing the site the proposal has not been progress towards completion.</p>
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	<p>3.6 <b>15/01927/O</b> - Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces was approved on 12 August 2016. Reserved matters were not submitted within three years of the planning permission being granted and consequently the permission has lapsed.</p> <p>3.7 The residential market is very different from when the design of the area east of the City Wall was conceived in 2006 (hybrid planning permission 06/00724/F granted on 21 March 2007); combining car parking for office tenants within the residential blocks is no-longer attractive to the market. Therefore, any allocation needs to include flexibility for a multi-storey car park to provide car parking for use by tenants of office accommodation within a specified area. Such an approach would acknowledge the historic and current use of a large area of surface car park and the mechanisms that have been incorporated into various planning permissions, which acknowledge a quantum of car parking for the sole use of tenants of the following office accommodation: St James' Mill; 1 St James' Court (Mills &amp; Reeve); 2 St James Court (Carmelite House); 3 St James' Court; Zone F, Dragonfly House and</p> <p><b>4 Soundness of proposed policy GNLP0409R</b></p> <p>4.1 Paragraph 35 of the National Planning Policy Framework (NPPF) states that, <i>“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</i></p> <ul style="list-style-type: none"> <li>a) <b>Positively prepared</b> – <i>providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</i></li> <li>b) <b>Justified</b> – <i>an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</i></li> <li>c) <b>Effective</b> – <i>deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</i></li> <li>d) <b>Consistent with national policy</b> – <i>enabling the delivery of sustainable development in accordance with the policies in this Framework.”</i></li> </ul> <p>4.2 Jarrold &amp; Sons contends that the current wording of Policy GNLP04709R would render the Greater Norwich Local Plan (GNLP) unsound on the following grounds.</p> <p>4.3 <b>Affordable housing requirement</b></p> <p>4.3.1 The development by Hill Residential (planning permission 18/01286/F) has an agreement for the delivery of 10% affordable dwellings on site. During the progress and determination of this application, and negotiations with regards to affordable housing delivery, Hill Residential has confirm that there was no suggestion or inference that the difference, between the</p>
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	<p>approved affordable housing percentage of 10% on Hill's site and the target for affordable housing percentage as set out in proposed GNLP policy 5, would be addressed by a greater than affordable housing policy requirement on Jarrold &amp; Sons retained land.</p> <p>4.3.2 The current draft of allocation policy GNLP0409R states, <i>inter alia</i>, that the allocation “will include a minimum of 300 homes, of which at least 84 (or 28%) should be affordable.” This does not take into account planning permission 18/01286/F or that it was granted within the context of the adopted City of Norwich Local Plan: Site Allocations and Site Specific Policies Plan, December 2014 which had two separate allocations for the area currently proposed by GNLP0409R.</p> <p>4.3.3 Whilst we acknowledge Norwich City Council's Affordable Housing SPD (July 2019) which at paragraph 2.37 states, “<i>Where a site is, or has been, in a single ownership, artificial sub-division to avoid provision of affordable housing will not be permitted. The intention behind this statement is to distinguish between those schemes which are prepared with the intention of circumventing JCS policy 4, and those schemes which have been drawn up addressing legitimate planning considerations, and therefore may not be able to provide affordable housing in accordance with the core strategy policy</i>”. Application 18/01286/F provides legitimate reasons, in particular viability and delivery. The application should in no way be considered an attempt to artificially divide the site. Therefore, if the remaining land comes forward for residential development it should be considered on its own merits and not linked to planning permission 18/01286/F in respect of affordable housing.</p> <p>4.3.4 In seeking to do so the policy essentially requires the remainder of allocation GNLP0409R to make up the shortfall in affordable housing provision ie of the remaining 80 new homes, would be required to provide 62 affordable homes and thus only 18 market homes. This would render development of the site unviable and therefore undeliverable. The GNLP is not supported by evidence to demonstrate why the site requires a specific and separate approach from that set out in GNLP policy 5. The approach to affordable housing in respect of policy GNLP0409R fails all four tests of soundness.</p> <p>4.4 <b>Mix of uses and quantum</b></p> <p>4.4.1 The current wording of the proposed GNLP0409R allocation states, “<i>Land at Barrack Street/Whitefriars (approx. 3.78 hectares) is allocated for residential-led mixed-use development. This will include a minimum of 300 homes of which at least 84 (or 28%) should be affordable. Offices and managed workspace, ancillary retail use, restaurants, bars, and recreational open space will be accepted as part of a balanced mix of uses.</i>” However, there is no evidence provided by the GNLP authorities which demonstrates that a mixed use development is viable and deliverable and thus it fails the “effective” test. Equally there is no evidence to demonstrate that this is the most appropriate strategy or why the alternatives proposed by Jarrold &amp; Sons (response to call for sites dated 8 July 2016 and response to earlier regulation 18 consultation dated 22 March 2018) are not reasonable.</p> <p>4.4.2 As referenced in paragraph 2.3 above Jarrold &amp; Sons has worked tirelessly over many years to attract inward investment into this part of the City of Norwich. It represents an important</p>
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	<p>opportunity to redevelop a brownfield site in a prominent location within Norwich. Jarrold &amp; Son contend that due to the context of the remaining area of land available for development (i.e. the area of the proposed allocation excluding the area of Hill Residential's development) the land use is less important than the quality of development and that the remaining areas are developed.</p> <p>4.4.3 There are easier sites to develop for either employment or residential uses within the GNLP area, and therefore policy restrictions which specify a use or that the uses should be mixed when there is no evidence for this, renders the GNLP unsound. The GNLP0409R allocation as currently worded undermines other policies within the GNLP. For example, proposed policy 1 of the GNLP – The sustainable growth strategy whereby <i>“Growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. It is provided through urban and rural regeneration, along with sustainable urban and village extensions. Most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area illustrated on the Key Diagram”</i> contained in the draft Strategy Document.</p> <p>4.4.4 Without suitable mechanisms to support city centre development it is unlikely growth will follow the distribution set out in the settlement hierarchy as outlined in GNLP policy 1 or that the GNLP will deliver the 30.8ha of city centre employment sites as outlined in GNLP policy 6.</p> <p>4.4.5 Supporting text contained within the regulation 18(c) draft GNLP Strategy Document offers support for the principle of office development in the city centre; paragraph 155 states <i>“Evidence shows that there is an underlying demand for good quality office growth and employment space in Norwich city centre.”</i> However, recent history reveals that despite this identified demand, office accommodation in the city centre has substantially decreased. Paragraph 259 of the Strategy explains <i>“A key part of retaining and growing employment in the city centre will be to reverse the loss of office accommodation in the city centre, as required by policy 1 of this plan, which has experienced a 25% reduction since the start of the Joint Core Strategy plan period in 2008”.</i></p> <p>4.4.6 Variations in parking standards across the three local authorities, and the resultant uneven playing field has likely contributed to the loss of city centre office accommodation and its relocation to sites such as Broadland Business Park. The discrepancy between parking standards within Norwich city centre and Broadland is notable with class B1 development in Broadland able to provide up to six times the level of on-site car parking permitted in the city centre.</p> <p>4.4.7 Further to this, paragraph 260 notes that <i>“the Employment Town Centre and Retail study (GVA 2017) concludes that Greater Norwich has enough employment land overall, most of this is out-of-centre and is neither the preferred location for some growth sectors nor the most sustainable place for high intensity employment / office growth. The report highlights key trends in employment activity including a re-urbanisation of business activity back to locations that can offer a broader range of services to employees, and the rise in new start-ups in the creative and media sector which is fuelling demand for space in specific locations allowing for greater interactions, including Norwich city centre.</i></p>
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	<p>4.4.8 However, evidence produced as part of the Greater Norwich Employment Land Assessment, December 2017 (GNELA) suggests that, <i>“even under the enhanced growth scenario the 42 allocated employment sites would provide almost three times the level of capacity that is required”</i> and whilst it is acknowledged that some sites are more suited to specific types of future employment than others the report points to multiple site clusters suited to office based employment such as professional, business and financial services and digital and tech industries including the Norwich city centre but also Broadland Business Park. In the situation where supply far outstrips demand potential tenants have ample opportunity to identify multiple suitable sites in search of not only their specific requirements but also prices, rates and the provision of on-site facilities such as car parking.</p> <p>4.4.9 Without support from policy, Jarrolds &amp; Sons feels that as paragraph 259 of the GNELA explains <i>“Given that the report also identifies an underlying demand for good quality office and employment space there is a risk that this may lead to new such development going to less sustainable locations with serious impacts on the vitality of the city centre and undermining policies to encourage modal shift.</i> Therefore, to avoid being found unsound the GNLP, through a combination of carrot and stick policies, needs to ensure that high density employment uses are concentrated in locations aligned to the growth/settlement hierarchy otherwise market forces will continue to direct office development away from the city centre. The rhetoric in the currently worded GNLP does not appear to lead to allocations which reflect a greater Norwich philosophy, instead there remains strategic tension between the locations which have historically been the singular focus of each of the authorities when acting individually. Unless the GNLP addresses the conflict within its documents and evidence base it fails the tests of soundness.</p> <p>4.4.10 Policy 7.1 addresses specific issues relating to Norwich city centre and a specific paragraph on the economy states, <i>“to ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters.”</i> This does little to promote the development of office facilities in the city centre when considered against the alternative options. Jarrold &amp; Sons feels that simply because policy specifies office space it does not mean that it will come forward and there has been little evidence produced to suggest otherwise.</p> <p><b>5 Parking</b></p> <p>5.1 The Norwich Development Management Policies Local Plan, December 2014 (NDMPLP) contains the car parking standards for specific development uses across various city locations. Of interest to the site at Barrack Street are use classes B1 office and C2 residential. Located in the City Centre Parking Area the maximum allowance for parking for class B1 office development is one space per 200m<sup>2</sup> and for residential one parking space per dwelling. Broadland Business Park is within the administrative area of Broadland District Council and as such is subject to different parking standards. When these standards are compared the contrast is stark. Detailed in the Parking Standards</p>
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	<p>SPD (2007) the maximum standard for class B1 development is one space per 30m<sup>2</sup> gross floor area. This makes Broadland Business Park highly attractive to potential tenants. In terms of residential provision, the minimum standard is one space per dwelling and up to two spaces for three bed dwellings.</p> <p>5.2 Until this imbalance is addressed through the inclusion of specific policies, the Strategy of the GNLP is unsound as there is no evidence that the Strategy will facilitate the delivery of city centre development and therefore be in compliance with Policy 7.1 which states <i>“Norwich city centre’s strategic role as key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high-density mix of employment, housing, leisure and other uses.”</i></p> <p>5.3 Jarrold &amp; Sons contends that specific parking provisions should be included within the policy allocations for the area covered by the suggested policy allocations map (drawing 8436-FM-DR-2001-A00). 180 car park spaces for the sole use of tenants of office accommodation within St James Place and Gilders Way office developments. This figure is arrived at to accommodate the 127 residual car parking spaces as part of Condition 10 15/01927/O and the 53 spaces as part of the design of area F.</p> <p><b>6 Amalgamation of previously separate allocations</b></p> <p>6.1 The area of the proposed allocation does not reflect the up to date position in relation to extant planning permissions and associated construction and completions. In its current form it does not satisfy the test of soundness.</p> <p>6.2 In reviewing the site’s history through the preparation of the GNLP process the amalgamation of sites CC17b and CC17a into allocation GNLP0409R has been made without sufficient or up to date evidence.</p> <p>6.3 Contained within the reason for allocation table on page 79 of the Norwich site assessment document is the justification for the enlargement of GNLP0409R to include both CC17a and CC17b. It states, <i>“It is appropriate to amalgamate the existing adopted local plan allocations CC17a and CC17b in a single allocation which acknowledges the acceptance in principle of current proposals to develop its western half nearest to Whitefriars for a residential-led scheme. Outline and detailed consents on its eastern half provide for 200 homes and offices to deliver the remaining phases of the St James Place office quarter which is counted in the existing commitment.”</i> Whilst Jarrold &amp; Sons supports the move away from the outdated allocation of CC17a and CC17b the proposed approach to assessing the site is unjustified. The evidence base does not contain details of the assessments for the reallocation potential of existing commitments to support the sites amalgamation.</p> <p>6.4 Second to this, the site allocations document Norwich Part 1 states <i>“Consented proposals for both parts of the site as at April 2019 could potentially deliver up to 418 new homes.”</i> In the time since April 2019, as referenced in paragraph 3.5, planning permission 15/01927/O has lapsed and therefore can no longer be considered an existing commitment. Similarly, despite planning permission 08/00538/RM being in perpetuity the development has not progressed in the six years since it lawfully commenced and once again should not be considered an existing commitment. Based upon this evidence Jarrold &amp; Sons contends that the areas remain as two separate allocations albeit</p>
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with boundaries which accord with planning permission 18/01286/F (Hill Residential's development) and the residual area. The unjustified amalgamation would lead to the GNLP's failure when considered against the tests of soundness.

**7 Modifications required to the GNLP**

7.1 Jarrold & Sons contends the in order for the GNLP team to remedy the failure of the current regulation 18 GNLP to satisfy the tests of soundness the following modifications are required:

7.2 Remove the area the subject of Hill Residential's development (planning permission 18/01286/F) from the allocation completely on the basis that it will be fully completed by the time the GNLP is adopted; and modifications in the table below relating to only that area identified on drawing 8436-FM-DR-2001-A00.

POLICY GNLP0409R	Reason for modification:
<p><del>Land at Barrack Street/Whitefriars (approx. 3.78 hectares) is allocated for residential-led mixed-use development. This will include a minimum of 300 homes, of which at least 84 homes (or 28%) should be affordable. Offices and managed workspace, ancillary retail use, restaurants, bars, and recreational open space will be accepted as part of a balanced mix of uses.</del></p>	
<p><u>Land south of Barrack Street (approximately 2.25 hectares) is allocated for development. Suitable uses are homes (including residential care homes), offices and managed workspace, ancillary retail and professional uses (A1 and A2), restaurants, cafes and bars (A3 and A4) and provision for 180 car parking spaces for the sole use of tenants of office accommodation within the St James Place and Gilders Way development.</u></p>	<p>Refer to preceding paragraphs in this representation.</p>
<p>The development will achieve the following site-specific requirements:</p>	
<ul style="list-style-type: none"> <li>Achievement of a high quality, locally distinctive <del>and energy and water efficient</del> design of a scale and form which respects and takes advantage of its riverside context and location <del>within and adjoining the City Centre Conservation Area.</del></li> </ul>	<p>Deletion of energy and water efficient design as covered by other policies.</p> <p>The City Centre Conservation Area boundary is the City Wall to the west of the area identified on drawing 8436-FM-DR-2001-A00. The wording of this bullet point requires amendment to reflect this.</p>
<ul style="list-style-type: none"> <li><del>Enhances the setting of the City Wall scheduled ancient</del></li> </ul>	<p>For an allocation relating to the area identified on</p>

	monument, protects and enhances adjoining heritage assets and their settings including key views from and into the site.	drawing 8436-FM-DR-2001-A00 the first part is not relevant.
	<ul style="list-style-type: none"> <li>Ensures a high level of flood resilience and incorporates appropriate flood mitigation measures (including addressing identified risks from flooding from rivers and surface water flooding);</li> </ul>	
	<ul style="list-style-type: none"> <li>Re-establishment of the built frontage to Barrack Street;</li> </ul>	
	<ul style="list-style-type: none"> <li><del>The office element of the scheme should be located to extend and consolidate the existing completed phases of the St James' Place development at Gilders Way;</del></li> </ul>	It is not clear what this is seeking to achieve and there is no evidence as to why it is required.
	<ul style="list-style-type: none"> <li>Provision of well-designed parking areas (in the form of <u>basement/undercroft, surface or multi-storey car parking</u>) <del>to serve proposed office uses together with segregated areas for residents parking. Low car development is appropriate and desirable in this location.</del></li> </ul>	Refer to preceding paragraphs in this representation.
	<ul style="list-style-type: none"> <li><del>Maximises</del> <u>Incorporates</u> the views across, from and of the river. Retain the existing embankment line and historic features. [Is this ok?] Enhancement of river access including provision for the extension and maintenance of the riverside walk (including the <del>creation of a small garden square near the city wall</del>) and the establishment and improvement of pedestrian and cycle routes north-south across the site from Jarrold Bridge to Barrack Street to connect with the existing cycle network.</li> </ul>	To maximise views would be too restrictive and could be interpreted in different ways by different planning officers. The garden square relates to land within Hill Residential's development area and is therefore not relevant.
	<ul style="list-style-type: none"> <li><del>Provision of heritage interpretation related to the printworks;</del></li> </ul>	This relates to land within Hill Residential's planning permission 18/01286/F area and not relevant to the revised allocation area.
	<ul style="list-style-type: none"> <li>High quality landscaping, planting and biodiversity enhancements including protection of trees along the river edge;</li> </ul>	
	<ul style="list-style-type: none"> <li><u>If the proposals including residential development, it should include the P</u>rovision of open space and play space;</li> </ul>	
	<ul style="list-style-type: none"> <li><del>Protection of bankside access for maintenance purposes.</del></li> </ul>	What and where is this?

	<p>Notes GNL P0409R:</p> <p><del>The site was previously allocated in the adopted 'Site allocations and site-specific policies' plan in two parts. The western half nearest to Whitefriars identified for office development and the eastern half for mixed use development with housing and an element of offices, reflecting aspirations to deliver the remaining consented phases of the partially completed St James's Place office quarter.</del></p> <p><del>Consented proposals for both parts of the site as at April 2019 could potentially deliver up to 418 new homes (200 of which form part of the existing housing commitment), 8,100sq.m of offices, open space, car parking to serve existing and proposed office users and ancillary retail and commercial uses.</del></p> <p><del>To allow for flexibility and the option of securing a larger element of office and commercial development to deliver economic benefits if market conditions permit, the minimum housing allocation has been set at 300 homes, although more housing may be accommodated subject to an acceptable design and layout being achieved. This will include affordable housing providing a mix of affordable tenures consistent with identified needs at the time of submission of a planning application and subject to viability.</del></p>	<p>Jarrold &amp; Sons contends the allocation should continue to be treated in two parts, albeit with amended boundaries to reflect the recent planning history of the site. There is no relevance to the uses included in the previous allocations; the relevant context is the extant planning permission 18/01286/F and its rate of construction/completion.</p> <p>This is out of date as planning permission 15/01927/O has lapsed.</p> <p>This paragraph is no longer relevant.</p>
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**Please add additional sheets if necessary**

### **Disclaimer**

#### Data Protection and Freedom of Information

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed from the consultation site. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

If you wish to comment but feel that you have a strong reason for your identity to be withheld from publication, you can contact your District Councillor who will put forward your comments as appropriate. Please note that where you submit your views in writing to your local District Councillor, this is described as "lobbying" and the local member will be obliged to pass these on. The local District Councillor will be required to provide your details to the GNLP where they will be stored for their records.

Please note, however, that if you subsequently wish to comment as part of the formal Regulation 19 stage of the Greater Norwich Local Plan (due to take place in 2020) comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice here <http://www.greaternorwichlocalplan.org.uk/> for information on how we manage your personal information.

**Declaration**

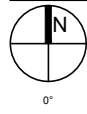
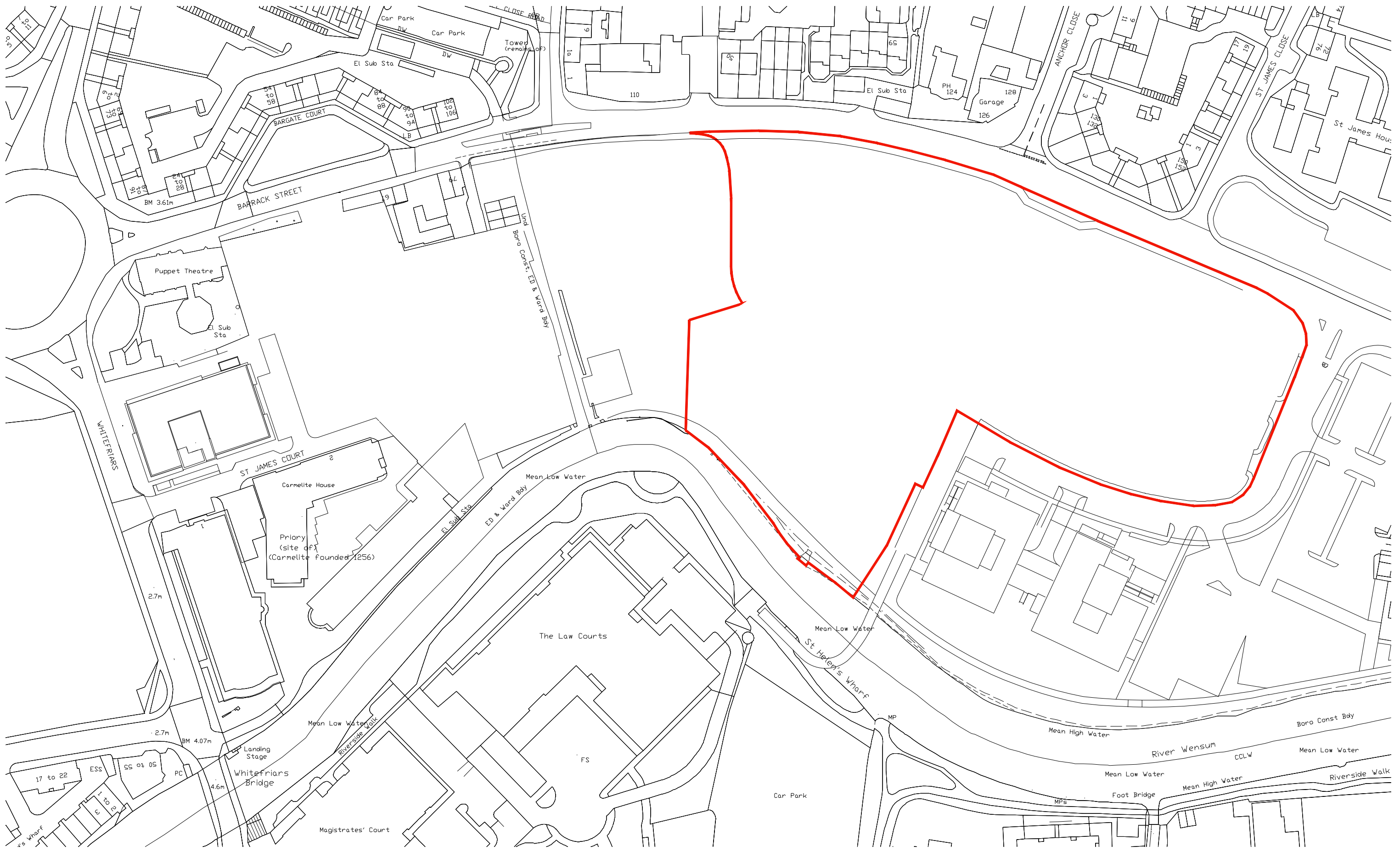
I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

**Regulation 18 Draft Local Plan Response Form**

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

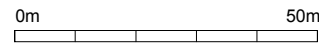
Your completed form should be returned to the Greater Norwich Local Plan team **no later than 5pm on Monday 16 March 2020.**

If you have any further questions about the ways to comment, or if you need consultation documentation in large print, audio, Braille, an alternative format or a different language, you can email us at [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or phone us on 01603 306603.



REV	DATE	CHK	AMENDMENTS
A00	21/03/2018	MW	First issue.

REF HEALTH AND SAFETY INFORMATION - CONSTRUCTION RISKS  
 XXX  
 NOTES  
 XXX  
 XXX  
 XXX



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DRAWING  
**Policy Area Plan**  
 (Zones A, E and F)

PRELIMINARY			
SCALE	PAPER	A3	DATE
1:1250			March 2018
JOB	DWG	REV	
8436-	FM-DR-2001		A00