

Norwich Local Development Framework

Norwich Society response to the Public Consultation on The Development management policies plan and The Site allocations plan.

1) Site allocations

- Several of the larger sites providing hundreds of housing units are in high flood-risk zones. Although specialist ‘flood resilient designers’ and Dutch master planners have been employed to solve the resultant problems, it still seems foolish to press ahead when we know East Anglia is liable to sink as global warming increases. Examples are: the Deal Ground, the Utilities site, Three Score, Heigham Water Treatment works
- Car parks; we are well aware of the use of garage sites being approved for affordable housing, and in general we are happy with this. However, the loss of surface car parking (e.g. Rouen Road, Chantry and Rose Lane car parks) in the City centre with very little replacement space is worrying. Several multi-storey car parks were placed in prominent and visually damaging positions in the 60s – a particularly insensitive example is the St Stephen’s/Queen’s Road multi-storey – and will no doubt be coming to the end of their viability. These will need to be ‘replaced’ if there is to be comprehensive redevelopment in the St Stephens area; one fairly small underground car park will not be sufficient. Also worrying is the use of Acro jacks in the new Duke Street multi-storey; is this award-winning example falling down? There must be a comprehensive transport framework ; PPG 13 is not sufficient, and car ownership will not simply disappear. The business community in the City needs parking for customers as well as for employees.
- Density; family housing is what is required above all on brownfield sites. Norwich City Council ill-advisedly allowed huge numbers of riverside flats to be built in the ‘boom years’, and the market for these is saturated. More apartment blocks on, for example, the NCFC Kerrison Road site and St Anne’s Wharf, will not solve the problem of providing housing for families.
- There seems to be no move to reinstate the ‘night-time economy’ on the Riverside development where it could be contained and policed with less effect on the City centre. Instead there is a remarkable silence on what is happening to Prince of Wales Road. This elegant avenue has been systematically taken over by the more disreputable underbelly of the night-time culture resulting in a sleazy, alcohol-fuelled atmosphere on a major thoroughfare.

- On the other hand, there is no mention of any culture apart from retail. There are no meeting places, theatres, galleries or concert venues in the whole document, nor is there any sense of place; this could be a framework for any large town in Britain. The JCS claims in Policy 8: *The development of new or improved facilities including those supporting the arts, street events, concerts and the creative industries sector will be promoted. Cultural heritage will be enriched through use of design and art in the public realm . . . provide for a range of activities including performance space and/or access to green space.* Again in JCS Policy 2, promoting good design: *All developments will be designed to the highest possible standards, creating a strong sense of place. In particular development proposals will respect local distinctiveness.* How do we make it ‘belong’ to Norwich? One suggestion is to change the potential use of the St Anne’s Wharf site from housing to a cultural centre providing a large performance space as well as related cafés, galleries and shops. There would be sufficient parking space as well, and it would be possible to use Howard House as part of the complex. This would help bring the whole Mountergate/King Street area back into productive use.
- We note that some of these sites are already under construction, with several more granted planning permission
- Some individual sites we would like to comment on:
 - i. Heigham Water Treatment Works: this is a beautiful waterside area with interesting industrial architecture – it should be kept as public open space (see JCS Policy 8 above)
 - ii. Norwich Community Hospital: there are very solid Art Deco ward blocks/operating theatres at the rear of this site which should be restored and protected – they would make very desirable apartments. The old nurses’ home is also of architectural interest, although this doesn’t appear to fall within the potential redevelopment area.
 - iii. Lower Clarence Road should be treated with respect; it has no housing at present on the railway side of the road, but any potential housing should take advantage of the high views and railway heritage.
 - iv. We do not think an enterprise and innovation centre at Earlham Hall is a sustainable project; this needs rethinking.
 - v. The St Stephen’s/Westlegate redevelopment is obviously in its early stages, but this opportunity to enhance the premier route into the City must not be squandered. Seven-storey blocks would appear merely to repeat the mistake of allowing tower building in our centre. Local heritage markers such as the lost St Stephen’s Gate and the remaining City wall should be referenced.

2) Development management policies

The policies outlined in this document seem to be, on the whole, what is already in practice generally, and to make good practical sense.

* Car parking is always going to be a problem until the whole City centre is made traffic-free; parking for householders in inner city areas is an almost insurmountable problem until car ownership becomes untenable, either by pricing or scarcity of fuel.

* Late night economy zones need tightening and enforcing, or we continue to have the Wild West on Prince of Wales Road every weekend. More cultural activities should be encouraged and developed.

* Design principles as in Policy DM3 should be adhered to; in particular we would emphasise proposals which respect and enhance local distinctiveness and character (c) and those which relate to surrounding buildings and environment (g). *Norwich needs to build on its strengths and promote local distinctiveness through high quality design (PPS 1).*

* Policy DM9 states that *all development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place.* The Norwich Society has recently drawn up a Local List of buildings and areas outside delegated conservation areas which it is considered are deserving of protection. This will be lodged on the Historical Environment Record and so will be referred to in identifying local heritage assets.

* With a greater concentration of housing in the City, there should be a strong emphasis on community facilities; this document focuses mainly on pubs, though doctors' surgeries and community centres are mentioned, along with a nod to sports facilities (PPS 4) The large companies which employed many Norwich people in the past, such as Norwich Union and the Gasworks, provided such facilities, but they are now sold off. Consequently there is a need for more outdoor sports facilities and community centres for public use.

3) Norwich's Locally Identified Heritage Assets.

Inclusion of the Norwich Society's Local List within City Council's Development Management Policy.

The Norwich Society's Local List is currently at the draft stage. Over the past three years our teams of volunteers have surveyed the whole of the city, excluding the Conservation Areas and have identified over 120 buildings or other heritage assets. All are judged to be of local importance, either to their individual communities' or to the City as a whole. This process has been guided by the city council's conservation officer Chris Bennett who has helped establish the selection criteria , and by English Heritage who have advised on the assessment and consultation phases. A panel of experts led by Hugh Fielden has met and moderated the volunteers submissions. In early September the Norwich Society's Local List will be the subject of an exhibition at the Forum, during HODS week and this together with its publication on the Society's website will form the public consultation phase prior to the finalisation of the list at the end of the month. The Norwich Society has instigated and managed the whole project in co-operation with the City Council, and in order for our Local List to become a useful planning tool, we would like to suggest that it is included within the City's Development Management Policy document. This is in line with current advice from English Heritage.¹

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¹ P5, 1.3 Local development Plans & local listing; English Heritage Good Practice Guide for LocalListing: Identifying and Managing Significant Local Heritage Assets (Draft for Consultation February 2011)