

Greater Norwich Local Plan (GNLP) Examination

Hearing Statement

Matter 3, Issue 1 – The Norwich Urban Area

Prepared on behalf of Columbia Threadneedle Investments and Weston Homes Plc

14 January 2022

Introduction

1. This Statement has been prepared on behalf of Columbia Threadneedle Investments (CTI), the owners of Anglia Square Shopping Centre and surrounding vacant land, and is submitted in addition to the representations made by their developer partner, Weston Homes Plc (WH), in relation to Policy 7.1 and Policy 0506 (Anglia Square).
2. This Statement makes reference to the following examination documents:
 - Strategy Advice (December 2017) [B3.1]
 - Greater Norwich Town Centres & Retail Study – Volume 1 (October 2017) [B3.5]
 - Greater Norwich Town Centres & Retail Study Update (December 2020) [B3.9]

Question 4: Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?

3. CTI and WH welcome, in general terms, the Policy 7.1 support for the comprehensive redevelopment of the large district centre at Anglia Square and surrounding vacant land for viable, high density, housing-led mixed-use development including retailing, employment, community and leisure facilities.
4. Section 1 (Economy) of the policy appropriately identifies some of the types of small and medium sized enterprises that may have need for floorspace within the city centre (including the Northern City Centre) as justification for resisting loss of existing office floorspace. However, many of these uses now fall within Class E of the Use Classes Order, and therefore the policy should reflect the new opportunities for their accommodation within:
 - i. vacant Class A premises which may be redundant and otherwise appropriate in scale and location for such uses, and now available without the need for a change of use; or
 - ii. purpose-built, flexible Class E accommodation.
5. Existing office floorspace may not be suitable or adaptable, or in the right location or financially viable to use for these wider Class E uses (as is the case at Anglia Square); whereas existing/former Class A premises may meet some of the demand, and within redevelopment proposals which involve removal of existing office floorspace, new Class E premises of smaller and/or flexible size could suit them well in appropriate locations. Accordingly, a blanket resistance to 'loss of existing office floorspace' does not reflect the greater flexibility to meeting the floorspace needs of the types of enterprises listed in Policy 7.1 section 1 that Class E now offers.
6. Section 2 (Retail and main town centre uses) of the policy states that *'The centre's retail function will be supported as part of a complementary range of uses'* which, we submit, is broadly consistent with the approach outlined within B3.9¹ and with the NPPF requirement that town centres should be allowed to

¹ Paragraph 4.53, page 34 (inter alia).

‘grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters’ (paragraph 86a).

7. The criteria listed in section 2 describe which types of retail and non-retail uses will be accepted (most but not all² of which fall within the NPPF definition of main town centre uses). We support this provision for a mix of uses, which accords with the NPPF and is necessary to ensure the policy approach is sufficiently flexible and responsive to changing market demands and the role of town centres in serving the needs of local communities.
8. Given therefore the introduction of Class E within the Use Classes Order, and noting that the second criterion under section 2 promotes in broad terms the *‘diversification of services and facilities to ensure [town centre] vitality and vibrancy’*, we would support modifications which make it clear that Class E uses will also be accepted. We further consider it appropriate to reflect the introduction of Class F1 (Learning and non-residential institutions) and Class F2 (Local community) on the basis these categories include complementary services and facilities which can make a positive contribution towards town centre vitality and viability.
9. We would also submit that, given that section 2 sits below the main heading ‘The City Centre’, the reference to *‘The centre’s retail function...’* could imply the policy is directed only at Norwich City Centre. However, Policy 7.1 including section 2 also relates to the large district centre *‘in the wider Northern City Centre strategic regeneration area identified on the Key Diagram’*. We therefore recommend that amendments are necessary to ensure this part of the policy is precise and effective in including that area.
10. The next sentence within section 2 states, *‘Provision for any additional comparison retail floorspace will primarily be met through the intensification of retail use on existing sites’*. Whilst we would support the focus on existing retail sites to meet any comparison retail floorspace requirements, the wording *‘intensification of retail use’* is not helpful or justified in the current retail market and, more significantly, is not supported by the evidence set out within **B3.9**³. This makes it clear that, in the light of the forecast over-supply of comparison retail floorspace in the Norwich Urban Area (circa -20,000 sqm net)⁴, a more effective approach should *‘concentrate upon existing provision in terms of redevelopment, refurbishment/remodelling, and, in some instances, down-sizing and repurposing to other land uses appropriate to town centre environments’*.
11. Accordingly, we further recommend that the first criterion under section 2 is modified to reflect that retail floorspace proposals should contribute to meeting identified qualitative or quantitative needs. This is particularly justified in respect of the comprehensive redevelopment of Anglia Square, with **B3.1**⁵ making it clear that:

Although the Retail Study [B3.5] has identified no quantitative need for additional convenience goods retail floorspace to serve the Norwich urban area, there is an opportunity for qualitative improvements to the convenience goods retail offer in Anglia Square/Magdalen Street district centre, owing to the current limited facilities for local residents, with the exception of a small Iceland store. The scope for improvements will be dictated by the availability of land and premises in and around the district centre and the physical constraints of the centre. As such, this study does not dictate the form of additional provision, as this will be influenced by a suite of considerations at the development management stage and we also consider that qualitative improvements can be achieved in a number of ways. (emphasised)

Recommended policy changes

12. We set out below our recommended changes to section 1 (Economy) of Policy 7.1 to ensure it is justified, effective and compatible with the changes to the Use Classes Order. These changes are shown in red.

² Notably housing and education.

³ Paragraph 6.6 (second bullet), page 46.

⁴ This updated assessment of comparison retail floorspace ‘need’ should supersede the B3.5 forecasts cited in the Policy 7.1 supporting text at paragraph 325.

⁵ Paragraph 3.38, page 17.

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 create industries, technology, financial and cultural and leisure services clusters. To support this, loss of existing office floorspace will be ~~resisted~~ acceptable where demonstrated to be replaced by flexible Class E accommodation of an appropriate quantum to also enable achievement of the other objectives of the Plan for mixed-use redevelopment at the locations supported by this Policy.

Development of buildings...

13. We set out below our recommended changes to section 2 (Retail and main town centre uses) of Policy 7.1 to ensure it is justified, effective and compatible with the changes to the Use Classes Order. These changes are shown in **red**.

The ~~centre's~~ retail function of the City Centre's primary and secondary retail areas and the large district centres will be supported as part of a complementary range of uses. Provision for any additional comparison retail floorspace will ~~primarily be met through the intensification of retail use on existing sites~~ be focused on these centres in accordance with the sequential approach.

Proposals for new development and change of use in the City Centre's primary and secondary retail areas and the large district centres (as defined in policy 6) will be accepted where they:

- contribute to meeting identified qualitative or quantitative needs for new retail floorspace and other main town centre uses, including speciality and independent shopping and small-scale retailing; or*
- promote diversification of services and facilities falling within Use Classes E, F1 and F2 to ensure that vitality and vibrancy can be maintained throughout the day and evening; or*
- provide mixed-use development including housing, high quality employment, flexible working, education, leisure, culture and entertainment, where this supports and complements the function of the centre; or*
- secure the beneficial redevelopment and adaptation of disused and underused land and premises including redundant retail floorspace.*

Ends.