

Greater Norwich Local Plan (GNLP) Examination

Hearing Statement

Matter 9, Issue 1 – Anglia Square (Policy 0506)

Prepared on behalf of Columbia Threadneedle Investments and Weston Homes Plc

4 February 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 their developer partner, Weston Homes Plc (WH).
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 6: Are the detailed requirements set out in Policy GNLP0506 justified and effective? Are they supported by the evidence and deliverable?

3. CTI and WH welcome, in general terms, the Policy 0506 (criterion 1) support for:

Delivery of a comprehensive, mixed use regeneration scheme which can include residential development, student accommodation, retail units contributing to the Magdalen Street/Anglia Square large district centre, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities as part of a balanced mix.

4. The provisions of criterion 4 (requiring *Removal of the derelict and long-term vacant buildings from the site...*) are supported and will be necessary to achieve the delivery of a comprehensive, mixed use regeneration scheme. Moreover, the Secretary of State's decision on the previous scheme recognises at paragraph 75 that, *insofar as the current condition of the site is a barrier to investment, that barrier would be removed* through the redevelopment of Anglia Square.

5. The remainder of this Statement focuses on the site-specific requirement set out under criterion 3, which seeks:

A significantly improved retail/leisure offer providing a continuous active frontage between Magdalen Street and St Augustine's Street.

6. CTI and WH are committed to ensuring that Anglia Square retains its position and function as part of the Large District Centre. While retail and leisure uses should play an important role in this respect, they are not the only suitable main town centre uses (some of which criterion 1 identifies in addition to *community facilities* which are not defined as main town centre uses in NPPF terms¹ but would clearly be a suitable use). This is supported by other parts of the plan, notably section 2 of Policy 7.1, where it states that *'The centre's retail function will be supported as part of a complementary range of uses'* which, as an approach, is broadly consistent with the NPPF requirement that town centres should be allowed to *'grow and diversify in a way that can respond to rapid changes in the retail and leisure*

¹ See the definition of 'main town centre uses' within NPPF Annex 2: Glossary.

industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters’ (paragraph 86a).

7. We would also submit that the emphasis on a ‘*significantly improved retail/leisure offer*’ lacks regard for prevailing market conditions and (in respect of retail) the continued rapid growth of internet shopping which, as the evidence base (**B3.9**²) highlights, has forced retailers to reevaluate their store requirements and polarise to *the prime retail pitches, with the secondary and tertiary pitches contracting and deteriorating in some centres due to limited demand...*
8. To that end, it is considered that Anglia Square falls within the category of a secondary retail pitch, serving a relatively localised catchment commensurate with its ‘second tier’ status in the hierarchy of centres (as GNL Policy 6 defines). Meanwhile, the City Centre’s primary and, to a lesser extent, secondary retail areas are the most attractive locations for a high proportion of national retailers and commercial leisure operators, reflecting the centre’s position at the apex of the hierarchy and its region-wide catchment.
9. The evidence set out within **B3.9**³ recognises that:

...projects involving retail floorspace provision are likely to be driven towards qualitative improvements which could involve a combination of: (A) redevelopment of existing space in order to provide replacement retail floorspace which is suited to the modern needs of the retail sector; (B) re-purpose sites with existing floorspace in order to allow for a wider range of active land uses to maintain and enhance town centre health (including, in appropriate circumstances, the down-sizing of retail space). (emphasised)
10. The focus on qualitative improvements is particularly justified in respect of the comprehensive redevelopment of Anglia Square, with **B3.1**⁴ 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)
11. We further note that **B3.9**⁵ forecasts an over-supply of comparison retail floorspace in the Norwich Urban Area (circa -20,000 sqm net). This is an additional strong indicator that proposals involving new or replacement retail floorspace, such as the Anglia Square regeneration scheme, should be focused on qualitative improvements (as opposed to the intensification of retail use which is not supported by the evidence base – a point which also applies to section 2 of Policy 7.1⁶).
12. Accordingly, we recommend that the site-specific requirement set out under criterion 3 of Policy 0506 is modified to reflect that proposals for Anglia Square should deliver qualitative improvements to the retail/leisure offer. Such improvements could include the provision of a new foodstore (to meet a qualitative need identified within **B3.5**⁷) and modern accommodation, comprising a range of unit sizes, for existing and new businesses.
13. The final part of criterion 3 requires the new retail/leisure offer to provide a ‘*continuous active frontage*’ between Magdalen Street (to the east) and St Augustine’s Street (to the west). Although CTI and WH would agree, in general terms, that providing active frontage along this route would help to integrate the Anglia Square regeneration scheme with the wider large district centre, it is not just retail and leisure

² See paragraphs 3.48-3.57 under the ‘Changing Retailer Requirements’ section, from page 20.

³ Paragraph 4.54 (first bullet), page 35.

⁴ Paragraph 3.38, page 17.

⁵ Paragraph 6.6 (second bullet), page 46.

⁶ See paragraph 10 of CPW Planning’s Hearing Statement in relation to Matter 3, Issue 1 (14 January 2022).

⁷ Paragraph 5.34 (third bullet), page 55.

uses that can perform this function; other complementary services and facilities (and residential uses – see below) can also make a positive contribution towards the achievement of active frontages.

14. It is further the case, we consider, that the emphasis on ‘*continuous active frontage*’ is not entirely compatible with the delivery of a *housing-led mixed-use development* (as promoted by Policy 7.1) which, by its nature, would include residential cores and entrances at ground floor level including along the route between Magdalen Street and St Augustine’s Street. Indeed, the provision of ground floor residential uses would serve to generate footfall and activity, including in the evenings when the large district centre’s shops and other businesses may be closed, and this would only strengthen the *active frontage* and, importantly, improve perceptions of safety and security.
15. We provide at the end of this Statement our recommended changes to criterion 3 of Policy 0506, which seek to address our concerns outlined above and ensure the policy is effective and justified having regard to the evidence base.

Question 7: How would the re-development of Anglia Square support and be the catalyst for change in the wider Northern City Centre strategic regeneration area?

16. Anglia Square today is in a state of decline and vacant building floorspace amounts to nearly half of the total quantum of retail and other town centre floorspace within the Policy 0506 site allocation (36,201 sqm GIA). Paragraph 574 of the Council’s committee report for the previous scheme states:

The visible signs of vacancy and dereliction blight the image of this part of the city centre and send a negative message to the development sector.

17. It is further relevant context that Anglia Square is situated within one of the 10% most deprived neighbourhoods in the UK, which has a particular impact on children and older people, while the area also suffers from high crime rates.⁸
18. The comprehensive mixed-use redevelopment of Anglia Square therefore provides considerable scope to improve baseline socio-economic conditions and reduce levels of deprivation in the area. The key regeneration benefits and catalytic effects in terms of supporting change in the wider Northern City Centre strategic regeneration area can be summarised to include the following:
 - i. Removal of long-term vacant and derelict buildings, which prompt negative perceptions of the area and represent a significant barrier to inward investment;
 - ii. Delivery of high density, housing-led mixed-use development (as supported by Policy 7.1) would create a substantial on-site residential population, generating expenditure to support local shops and other businesses, and therefore jobs, in the area;
 - iii. The provision of affordable housing and a mix of dwelling sizes to meet identified local needs;
 - iv. Enhanced public realm and accommodation for new and existing businesses, creating the conditions in which businesses can invest, expand and adapt (in accordance with NPPF paragraph 81), thereby helping to ensure the vitality and viability of the large district centre;
 - v. Improved access to a wider range of facilities, in addition to safe and accessible spaces that promote social interaction (in accordance with NPPF paragraph 92);
 - vi. Sustain a more significant employment base, both ‘operational’ jobs (for example, jobs in the retail and hospitality sector which are typically filled by the local population) and construction-related jobs utilising the local labour force and tackling worklessness.

19. It is noteworthy that the Secretary of State’s decision on the previous scheme recognises at paragraph 74 that ‘*the regeneration of Anglia Square is an important strategic objective, and he is supportive of the benefits in terms of economic development and housing that such a regeneration could bring.*’

20. Paragraph 75 of the decision adds:

The proposal would secure the regeneration of a strategic brownfield site, make a significant contribution to meeting housing need in Norwich, make a significant contribution to meeting the need for affordable housing in Norwich, provide a significant net gain in employment, helping to create the conditions in which businesses can invest, expand and adapt, and insofar as the current condition of the site is a barrier to investment, that barrier would be removed, and support the role that Anglia

⁸ Paragraph 259 of the committee report.

Square plays in the hierarchy of centres, promoting the long term vitality and viability of the LDC. Each of these benefits carry significant weight in favour of the proposal.

21. Whilst these benefits were identified by the Secretary of State in considering a particular form and nature of development proposed by CTI and WH through the previous scheme, we would submit that broadly the same benefits would be achieved by the comprehensive redevelopment of the site for *high density, housing-led mixed-use development* as promoted by Policy 7.1 and further supported by the provisions of Policy 0506.
22. The redevelopment of Anglia Square would therefore achieve a long-standing strategic priority and deliver clear and significant benefits, acting as a catalyst for positive change in the wider Northern City Centre strategic regeneration area.

Recommended policy changes

23. We set out below our recommended changes to criterion 3 of Policy 0506 to ensure it is effective and justified having regard to the evidence base. These changes are shown in **red**.

~~A significantly improved~~ Qualitative improvements to the retail/leisure offer together with a complementary range of uses, providing ~~a continuous~~ appropriate levels of active ground floor frontage between Magdalen Street and St Augustine's Street to support the function of the Large District Centre.

Ends.