Report for Discussion

Report to	Sustainable Development Panel 25 January 2012	**Item** 5
Report of	Head of Planning Services	
Subject	Evidence update for Site Allocations and Development Management Policies DPDs	

Purpose

The report is a further update providing information on the emerging evidence base for the Site Allocations and Development Management Policies Development Plan Documents (DPDs).

Recommendations

To note the evidence update within this report.

Financial Consequences

There are no financial consequences for the council relating to endorsing this document.

Risk Assessment

Not applicable.

Strategic Priority and Outcome/Service Priorities

The report helps to meet the strategic priority “Strong and prosperous city – working to improve quality of life for residents, visitors and those who work in the city now and in the future” and the service plan priority to deliver the Local Development Framework for Norwich.

Cabinet Member: Cllr Bremner

Ward: All

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Report

Background

1. Over the past few months members have been briefed on several key areas of evidence in support of the policies and proposals in the emerging Site allocations and Development management policies plans. The aim is to provide members with a greater understanding of the background to, and justification for, a number of key policy areas in both plans.

2. The evidence to support policies is set out in the form of topic papers. To date members have been briefed on evidence relating to employment, housing and open space and recreation issues. This report focuses on the remaining areas of evidence, set out below.

Updated evidence base

3. This report includes draft topic papers for the following policy areas.

    - **Transport:** this topic paper (attached at Appendix 1) provides information about the way that transport policies have been developed and how they respond to national planning guidance and to the emerging National Planning Policy Framework. It covers the following topic areas: encouraging sustainable travel; provision of City Centre public car parking; highway safety and protection of the function of the major road network; parking and servicing requirements; specific requirements for 'car free' and 'low car' housing; and provision for off-site improvements to mitigate the impact of development.

    - **Retail and town centre development:** This topic paper (attached at Appendix 2) provides background information to inform the retail policies in the emerging Development Management Policies Plan, and retail allocations in the emerging Site Allocations Plan. It shows that they meet the requirements of national policy and the JCS and that recent monitoring and data is being taken into account to assess the progress of the policies. The report notes that monitoring data highlights the high level of completions and permissions for convenience floorspace in recent years, and discusses possible implications.

Next steps

4. Production of evidence to support plan development is an iterative process. These topic papers, and the others which have already been discussed by the panel, will assist members in their consideration of the next draft of the Development Management Policies and Site Allocations plans.

5. It is anticipated that the final drafts of both plans will be reported to members in June and July, prior to regulation 27 (‘soundness’) consultation in late summer / early autumn. Prior to submission of the plans and supporting documentation to the Secretary of State (likely in early 2013), the topic papers will need to be updated to take account of the National Planning Policy Framework once revised (expected in March / April), updated monitoring information, the final sustainability appraisal reports for both plans (expected May), and changes to policies in response to representations made at Regulation 27 consultation stage (late summer / early autumn 2012).

APPENDIX 1

Transport Topic Paper

1. Introduction

1.1. This topic paper is part of a series of background papers which provide the evidence base for the emerging Development Management Policies and Site Allocations development plan documents (DPDs). These background papers will form part of the supporting documentation for the Regulation 27'submission' versions of both plans. It is anticipated that both plans will undergo a Regulation 27 'soundness' consultation in Autumn 2012, and will be submitted to the Secretary of State for public examination in spring-summer. Some of the background papers may require updating at a later stage in the plan process to take account of changing government policy, and/or updated monitoring information.

1.2. The transport topic paper provides information about the way that transport policies in the Development Management DPD have been developed, and how they respond to national planning guidance and the emerging National Planning Policy Framework.

2. Transport policy context

National Policy

Current national policy

2.1 The current national planning policy relating to open space, sport and recreation is set out in 'Planning Policy Guidance (PPG) 13 – "Transport" originally published in 2001 and updated in 2010. The objectives of this guidance are to integrate planning and transport at the national, regional, strategic and local level to promote more sustainable transport choices for both people and for moving freight, promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and reduce the need to travel, especially by car

2.2 Other planning policy statements that are also relevant to transport policy include

- PPS1 and its supplement advise on the approach that should be taken to ensure sustainable development

- PPS4 advises on the locational requirements for business to minimise the need to travel, especially by car

Emerging national policy

2.3 The Government has published a draft National Planning Policy Framework (NPPF) to simplify national planning guidance, which will eventually supersede all existing planning policy statements. The NPPF is part of a wider series of changes that the government is proposing or consulting upon which will change the planning system. These include the Localism Act (which includes the abolition of Regional Spatial Strategies).

2.4 It advises that transport policies have an important role to play in facilitating development but also in contributing to wider sustainability and health objectives and needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. The proposed Development Management Transport Policies cover the following areas as detailed in the guidance:

- Supporting, where practical, reductions in greenhouse gas emissions and congestion.
- Facilitating economic growth by taking a positive approach to planning for development.
- Setting out requirements for Transport Statements or Transport Assessments.
- Ensuring safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of the development.
- Supporting planning land use policies to ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- Ensuring developments are located and designed where practical to accommodate the efficient delivery of goods and supplies and give priority to pedestrian and cycle movements, and have access to high quality public transport facilities create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians incorporate facilities for charging plug-in and other ultra-low emission vehicles; and consider the needs of disabled people by all modes of transport.
- Setting out requirements for the implementation of travel plans.
- Minimising journey lengths for employment, shopping, leisure, education and other activities.
- Setting parking and other transport standards for residential and non-residential development.

Regional Policy

2.5 Regional Spatial Strategies (RSSs) are due to be revoked, with an estimated timing for this in April 2012. Since the emerging Development Management policies will be submitted subsequent to revocation, RSS policies are not covered in this topic paper.

Joint Core Strategy

2.6 One of the principal objectives of the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) is to ‘enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact. Within the Norwich Area, the strategy requires the implementation of the Norwich Area Transportation Strategy (NATS).

The Norwich Area Transportation Strategy (NATS) and Norfolk’s Transport Plan ‘Connecting Norfolk’)

2.7 NATS (now in its fourth edition) sets out the transport strategy for the Norwich Policy Area, and whilst its strategic aims are now superseded by the Transport Plan to 2026 (Connecting Norfolk), NATS has provided the basis for transport investment from the public sector (through the NATS Implementation Plan (NATSIP)) as well as influencing the transport impact and solutions provided for private sector investments. One of the overriding aims of the transport strategy for the Norwich Area is to achieve increasing demand for transport by means other than the private car, and this has been a strategic aim since the adoption of NATS3 in 1998. The proposed DM policies seek to continue with the current approach to transport planning in the Norwich Area, to ensure that development plays its part in achieving this. ‘Connecting Norfolk’, Norfolk’s Transport Plan until 2026, incorporates the aims of NATS for the Norwich area.

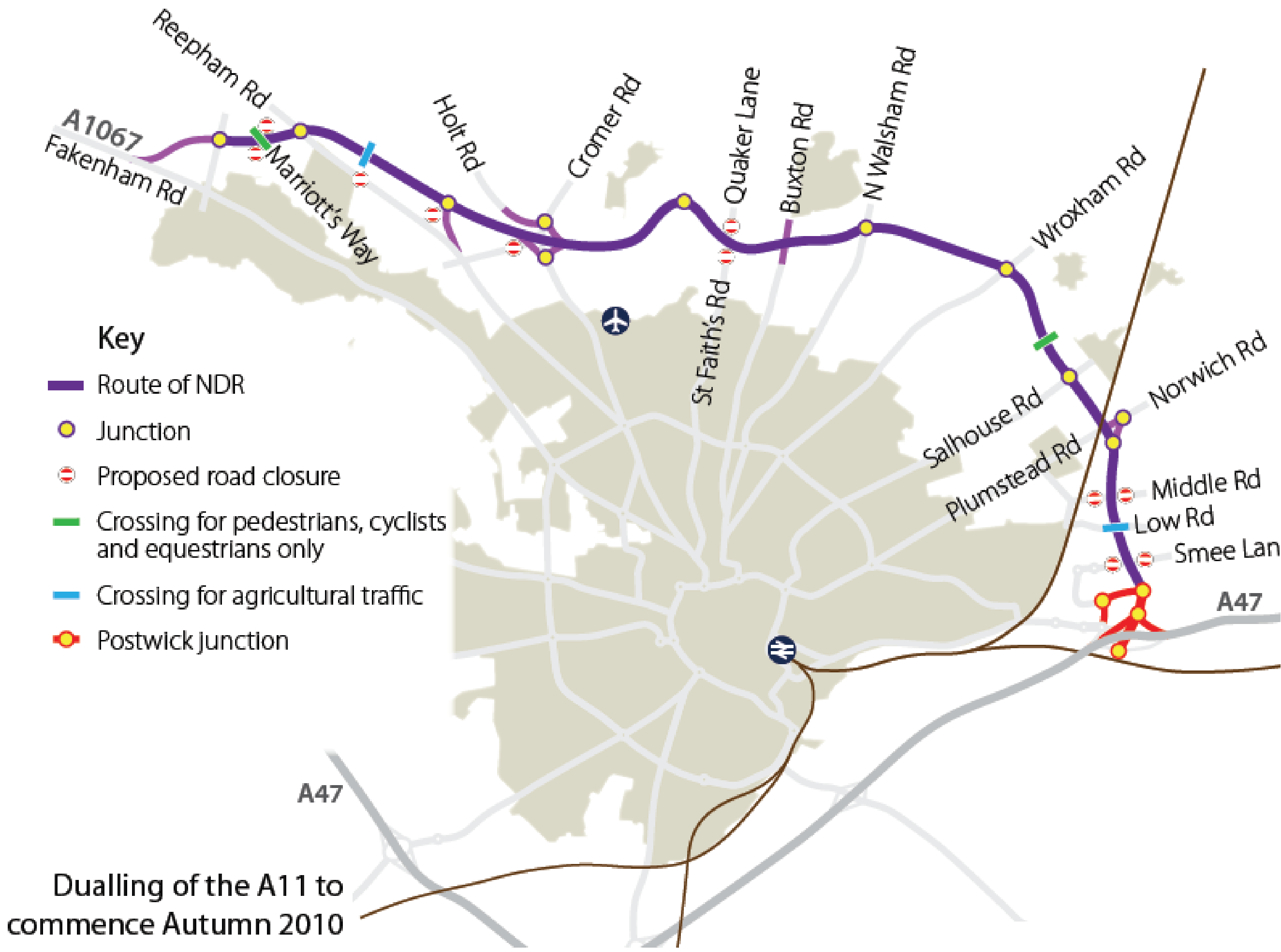
2.8 NATS is an overriding strategy for the Norwich Area, and aims to improve accessibility and provide for growth, whilst reducing congestion and pollution. This is to be achieved whilst improving safety, and ensuring that the strategy supports economic growth, whilst achieving quality in the built environment and reducing social exclusion. NATS therefore provides a framework for transport improvements, including ‘soft’ measures across the Norwich Area. A significant part of this is the Norwich Area Transportation Strategy Implementation Plan (NATSIP) which details areas of major transport investment in the City. It is, however, important to realise that NATSIP cannot in itself deliver the NATS strategy, which is reliant on an approach that requires all changes in the built environment to foster sustainable travel.

2.9 NATS has been successful so far in reducing traffic flows crossing the city. However congestion is an increasing problem creating longer journey times, leading to ‘rat running’ through residential areas, and causing delays to buses. Improving transport systems in a historic city like Norwich is not easy and a comprehensive range of measures, both within the city and on the important link roads is necessary, to keep people moving. NATSIP aims to provide high-quality alternatives to the car including public transport, cycling and walking and to reduce carbon emissions and the impact of transport on the environment and communities.

2.10 However, the plan also recognises that for many people the car will remain essential, particularly for those who live in more rural areas and that through-traffic to and from the north of Norwich adds to congestion in and around the city. The Northern Distributor Road (NDR) is designed to provide an alternative route for traffic to and from the north of Norwich widening the scope for major improvements and enabling us to promote more sustainable modes of transport in and around the city. It will also ensure that new housing areas to the north-east of Norwich are properly served by transport links and do not simply add to congestion. The City Council have supported the construction of the NDR because it will enable the provision of more sustainable transport infrastructure within the City, via the re-allocation of existing road space to more sustainable modes.

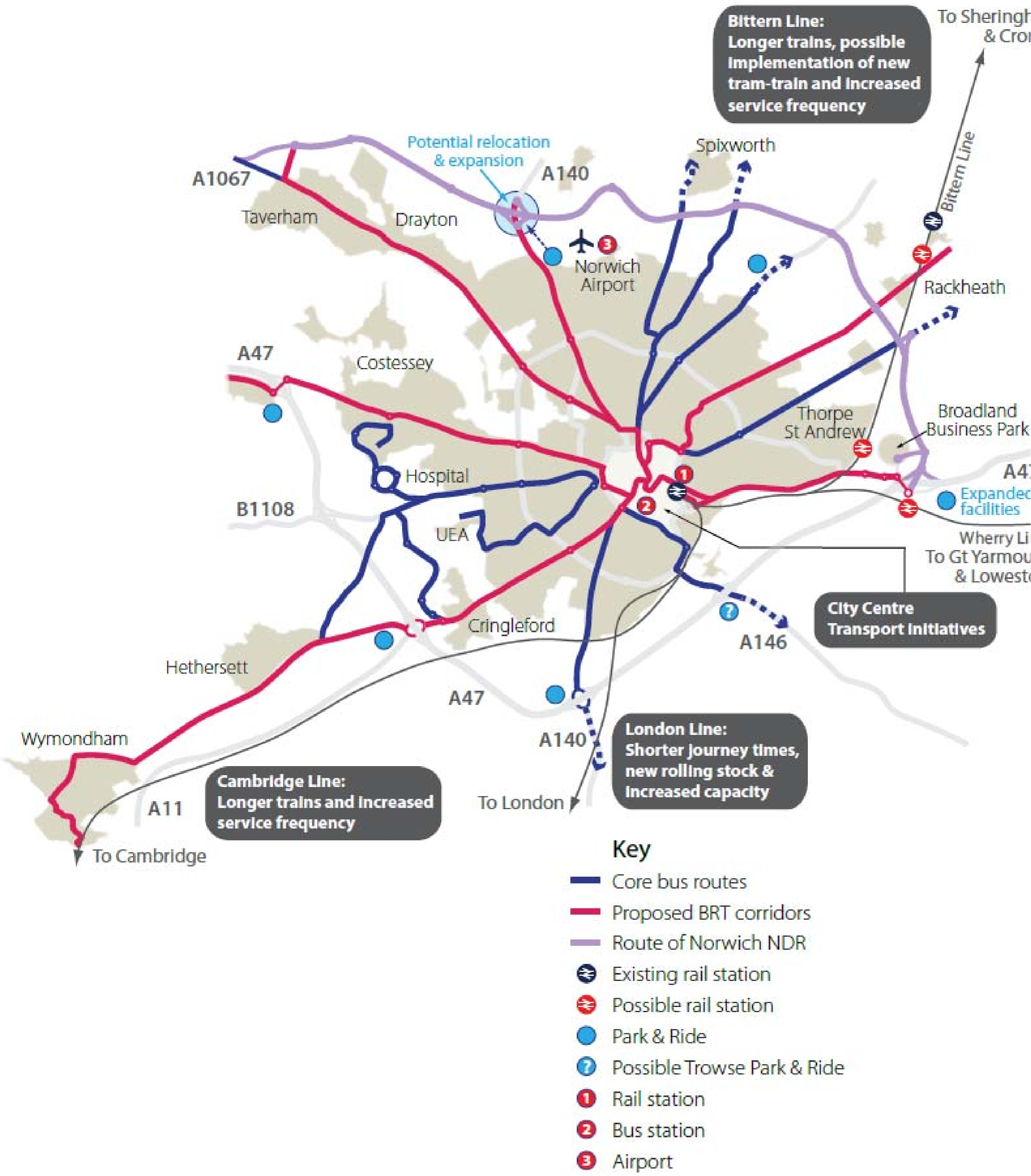
2.11 On the 14th December 2011, the Government announced an £86.5m allocation for the NDR from Postwick to the A140 (Norwich Airport), including the Postwick Hub junction improvement. While this announcement secures funding for the Norwich NDR, a number of statutory processes need to be completed, including planning approval for all except the Postwick Hub junction improvement. The allocation of NDR funding is conditional upon progress being made on the sustainable transport elements of NATS, such as bus rapid transit and improvements for cycling and pedestrians. It is expected that this is taken forward through an implementation plan setting the details and phasing of this spending.

2.12 The Postwick junction element of the NDR plans are most advanced. Planning permission has been granted and a public inquiry into the Side Roads Order is expected to be held early in the New Year (2012). A Side Roads Order is necessary because of the diversion/closure of existing roads as part of the junction improvement. The inquiry will consider objections to the Order being made.



Plan 1: The route of the NDR

2.13 Within the built up area, there are also proposals for significant improvements in public transport, with the provision of Bus Rapid Transit (BRT) on key radial routes within the City. Work has started on Dereham Road on the first part of a scheme that will in due course. The proposed routes for the BRT corridors are shown on the plan below and focus on the proposed expansion areas around the City. BRT must, however, be seen as a part of a much wider largely bus-based public transport system, that provides services to all the urban area, and much of the County. The diagram also shows the anticipated improvements to rail based transport, and the important bus routes that are not intended to be BRT corridors



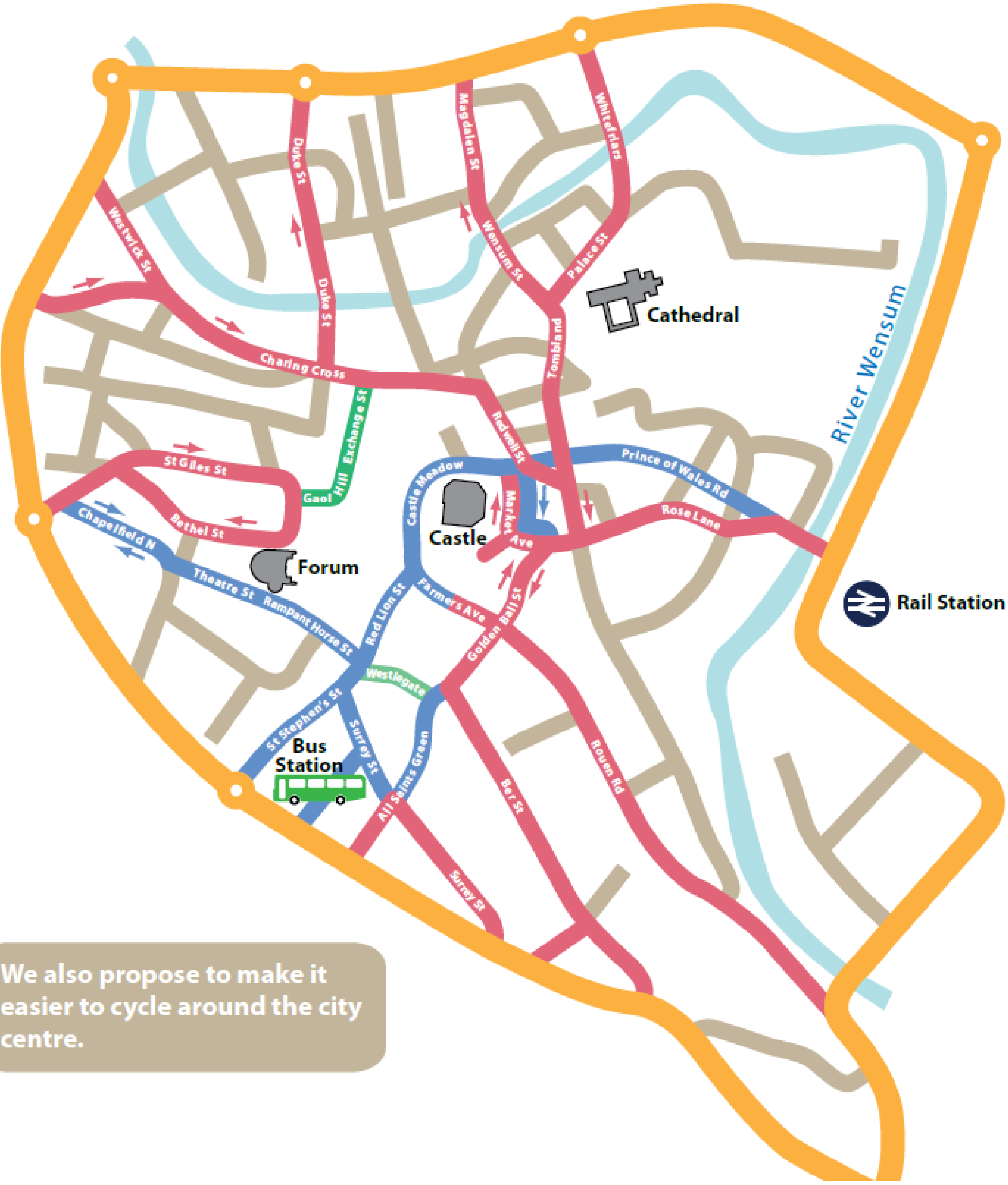
Plan 2: BRT Corridors

2.14 Continuing improvement within the City Centre is also proposed, to encourage further redevelopment, and encourage increased opportunities for jobs particularly in the retail and service sectors. In the current economic climate it is vital that we maintain Norwich's reputation as a top destination for shopping and entertainment, and a centre of business excellence. Good accessibility to, and within, the city centre is paramount in achieving this. We also need to ensure that the city centre retains its character and vibrancy. Improving the layout of streets influences how people move around and how they choose to get to their destinations and make the city a nicer place to live and visit. Reducing the dominance of traffic in certain areas of the city centre where there is a conflict between pedestrians and vehicles improves the experience for shoppers and visitors to the city by enhancing their safety, improving the quality of the air they breathe and creating space for them to enjoy Norwich's historic surroundings.

Street function

- Bus, cycle & access
- General traffic
- Pedestrian & access
- Existing routes
- Norwich inner ring road

All routes 2-way unless otherwise shown



We also propose to make it easier to cycle around the city centre.

<u>Plan 3: NATS City Centre Proposals</u>

<u>Local Policies</u>

Existing policies

2.15 Current policies for transport are set out in the Replacement Local Plan (adopted 2004) and are supported by Supplementary Planning Guidance (SPG) on Transport Contributions. They aim to:

- o Provide guidance on development at the Airport: TRA1, TRA2 and TRA19 (These policies are to be replaced with a generic Airport policy which does not, therefore, feature in the proposed transport policies)
- o Set out the approach to providing sustainable transport infrastructure Policies TRA3, 13,14 15,16, and 24
- o Set out standards for parking and servicing requirements,: Policies TRA4-8 inclusive
- o Encourage the provision of 'car free' housing; Policy TRA9
- o Provide for off-site improvements to mitigate the impact of the development, and ensure adequate infrastructure links; Policies TRA10 and 11
- o Set out the requirements for Travel Plans; Policy TRA12
- o Protect the function of the Strategic Road network; TRA18
- o Set out the strategy for public car parking within the City Centre; policies TRA21 and TRA22
- o Require that streets and footways make a positive contribution to the public realm; Policy TRA26 (This policy area is to be combined within an overall design strategy policy)

2.16 The policy approach for off site provision of transport requirements and its SPG rely on the premise from NATS that any increase in transport demand within the City should be catered for by means other than the car. The cost of provision of a 'Park and Ride' parking space is used as a proxy for calculating the contributions that are required to offset any increase in car borne traffic that a development is expected to create. These contributions are then used to provide sustainable transport infrastructure to encourage walking, cycling and the use of public transport.

Emerging Policies

2.17 Emerging policies in the draft Development Management DPD:

- Are streamlined in comparison with Local Plan policy;

- Comply with more recent higher level JCS policy;

- Are consistent with NATS, and in particular help implement local sustainable transport initiatives, and help to implement appropriate car parking restraint policies, whilst requiring mitigation for any increase in traffic created to achieve the target of no net traffic growth in the urban area.

- Take account of recent evidence and the forthcoming introduction of CIL.

2.18 The proposed transport policies cover the following topic areas, that are discussed in detail below:

- Encouraging sustainable Travel, including travel planning; Policy DM28

- Approach to the provision of City Centre public car parking; Policy DM29

- Highway safety, and protection of the function of the major road network ; Policy DM30

- Parking and servicing requirements; Policy DM31

- Specific requirements for ‘car free, and ‘low car’ housing; policy DM32

- Provide for off-site improvements to mitigate the impact of the development; Policy DM33

3. <u>The local evidence base</u>

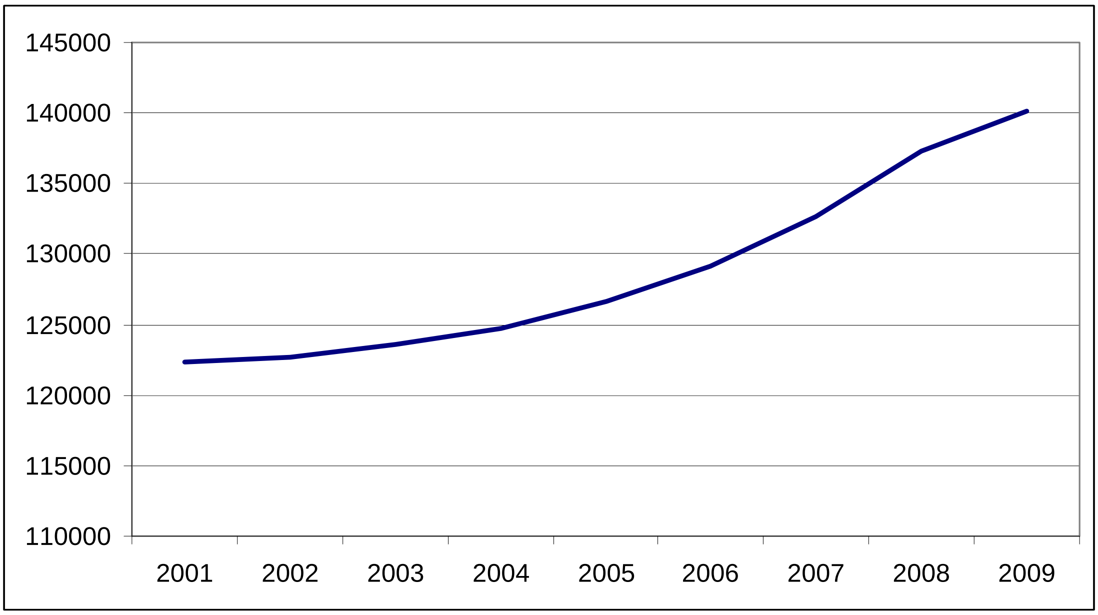
Background

3.1 NATS3 (1998) represented a ‘sea change’ in the approach to transport and traffic management in the Norwich area, moving from the then traditional model of ’predict and provide’ to a strategy that sought to manage traffic growth, and encourage more sustainable transport, with an overall aim of catering for all new transport demand by means other than the private car. The Replacement Local Plan (adopted 2004) provides the policy basis for ensuring that new developments support this strategy.

3.2 Norwich is the largest urban area in the county and a major economic driver and retail centre across a much wider catchment. The Norwich built up area has a population of around 210,000 people. Greater Norwich is the largest labour market in the East of England and is consistently ranked within the top ten most popular retail centres in England. Norwich supports more than 50 regional or national headquarters, with companies including AVIVA, Marsh, Virgin, Bayer Crop Science, Colmans, and Adobe Systems. It is a major financial centre, has one of Europe's largest single-site concentrations of research in Health, Food and Environmental Sciences and is home to the University of East Anglia.

3.3 Figure 1 shows how the population of the district of Norwich has increased over the period since NATS3 and the Local Plan were first adopted. The rate of increase has been increasing in recent years. Note that this graph shows the population of the district rather than that of the built up area. Compared to the rest of England the district of Norwich has a much higher proportion of people in their twenties. Conversely it has lower proportions of people over 40 years old.

Figure 1 Population of the district of Norwich



3.4 Norwich is an ancient city and much of its transport network is based on historic street patterns, with much of the city centre still retaining the medieval street layout. Whilst this makes it an attractive city, it does mean that the effectiveness of the transport system is limited and means that it is vital that the most efficient use is made of the limited capacity available. The city does have some existing transport problems, including ones of poor air quality, congestion on some routes at certain times of the day and a lack of coherence of its cycling network.

Transport Data

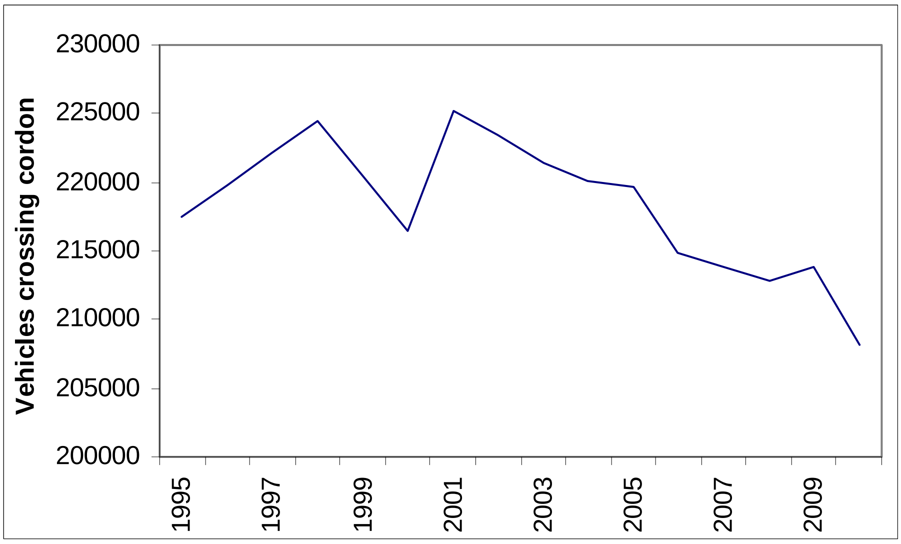
3.5 To determine the effectiveness of transport policy with relation to the aim of achieving increasing transport demand by means other than the car, regular surveys of transport use are conducted. The overall levels of traffic are determined by considering movements across the main cordons of the outer and inner ring road

Traffic at the Outer Ring Road Cordon

3.6 There has been an average decrease in traffic crossing the outer ring road of 1.1% per annum since 2005. In 2010 flows show a fall of 2.7% equating to a reduction of around 5,600 vehicles crossing the cordon during the day. The graph overleaf shows a dip in the trend for 2000 and this is likely to have been caused by the September 2000 fuel crisis. Since 2001 the number of vehicles crossing the cordon has fallen by over 17,000.

3.7 Figure 2 shows the variation in flows crossing the outer ring road cordon from 1995 to 2010. The decline since 2001 is clearly demonstrated.

Figure 2 Outer Ring Road Cordon Long-Term Trend

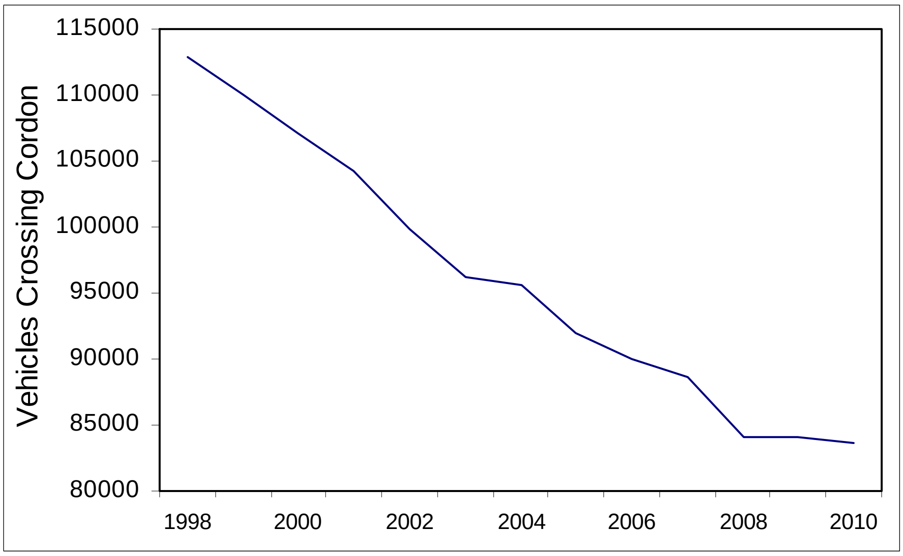


Traffic at the Inner Ring Road Cordon

3.8 Figures for the inner ring road cordon show a decline of just over 29,000 vehicles per day for the period 1998 to 2010. This represents an average annual decrease of 2.2% between 2004 and 2010. In 2010 flows fell very slightly by -0.6%, much less of a fall than in most of the previous years.

3.9 Figure 3 below shows the total numbers of vehicles entering the city centre. It clearly shows a large decline in vehicle numbers crossing the inner ring road cordon since 1998. It can be seen that this has slowed considerably in the last two years.

Figure 3 Inner Ring Road Cordon Long-Term Trend



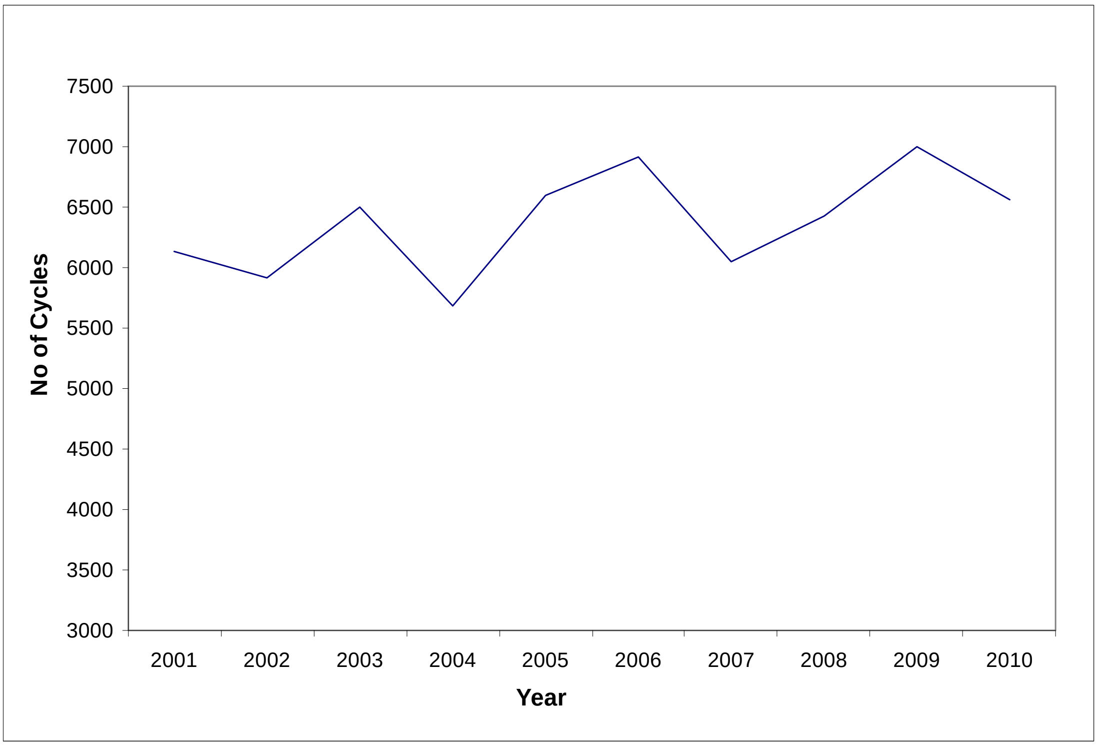
Cycling and Pedestrian Movements

Outer Ring Road Cordon

3.10 As well as counting traffic on the outer ring road cordon, the numbers of cyclists are also counted. (Pedestrians are not counted due to the difficulty in doing so: pedestrians could cross the road at any point throughout its length, and it is not feasible to monitor this – or even to monitor all of the crossing points. Pedestrians are, however, counted crossing the inner ring road since this is a more manageable task.)

3.11 Figure 4 shows how the numbers of cycles crossing the outer ring road cordon have varied over the time period. In 2010 there were around 430 more cyclists per day crossing the cordon than in 2001. This is the opposite trend to that of motor vehicles, which have steadily fallen (see Figure 2).

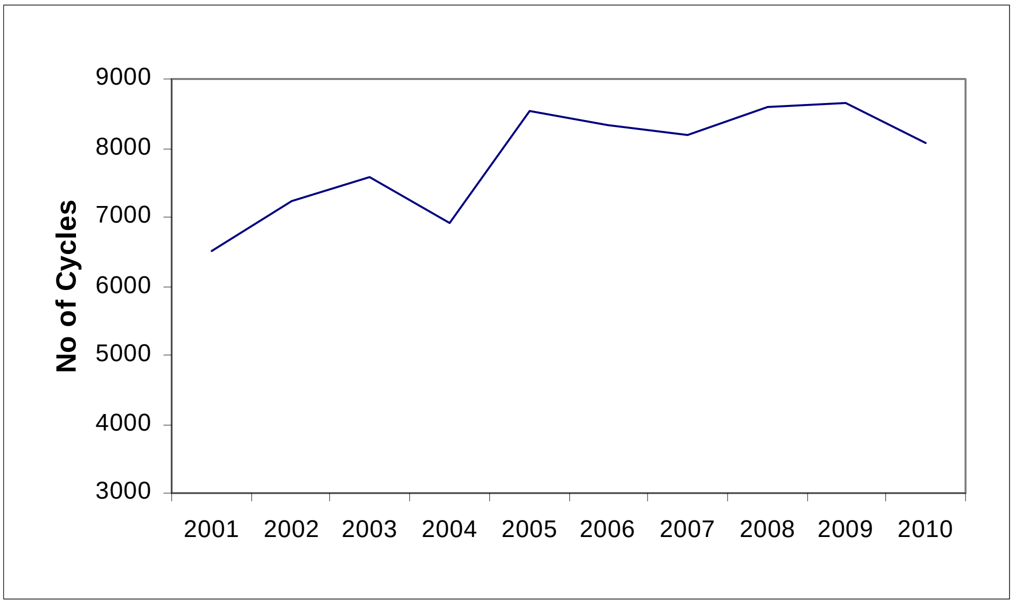
Figure 4 No of Cycles Crossing the Outer Ring Road Cordon



Inner Ring Road Cordon

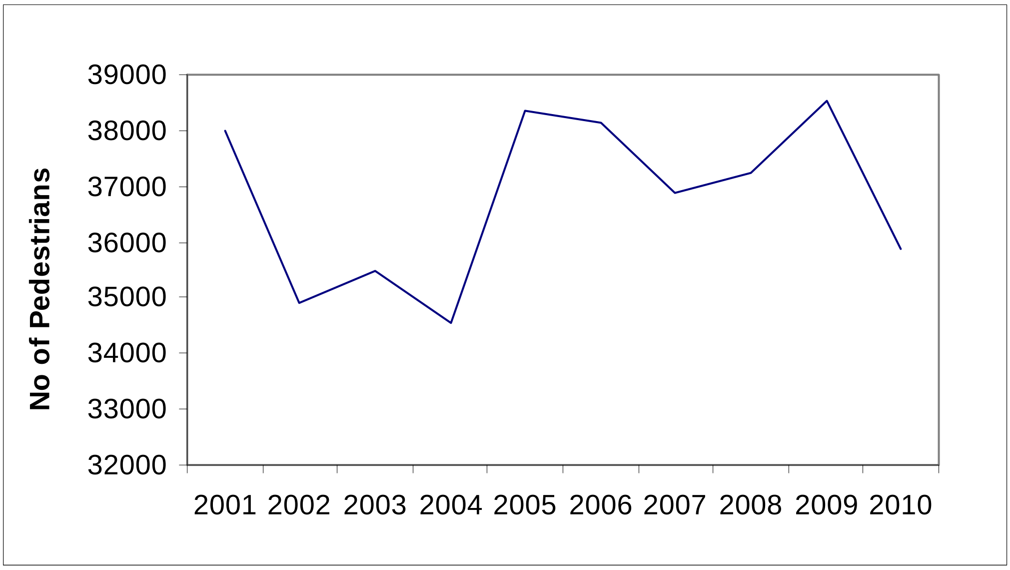
3.12 Annual cycle and pedestrian counts are undertaken on the off road routes that cross the inner ring road. The cycle data is comprehensive and, when combined with the on road traffic counts, provides a good estimate of the total cycles crossing the cordon. The entire off road cycle counts take place over 2 days and the average figure used. Bad weather can affect cycle numbers on a particular day and this helps to balance out this effect thus making the figures more reliable, but the severe weather in autumn 2010 is thought to be largely responsible for the apparent decline in cycling during this year. Figure 5 shows the numbers of cyclists crossing the inner ring road cordon since 2005.

Figure 5 No of Cycles Crossing the Inner Ring Road Cordon



3.13 The pedestrian data collected on the inner ring road cordon is from a sample of key sites. These counts give an indication of changes over time. However, they are a ‘snapshot’, based on limited manual counts, and are not, therefore as robust as figures for other modes that are collected automatically over an extended period of time. They are likely to be significantly impacted by weather conditions, and they do not give an idea of the total number of pedestrian trips crossing the cordon. Even if all the possible ring road sites were counted, it is unlikely that the total cordon crossing numbers would be reliable. This is because many would be the final walking leg at the end of a longer car or rail journey (and the extension of the Controlled Parking Zones into the inner suburbs since the mid 1990s might be impacting on these pedestrian ‘journeys’). Figure 6 shows the numbers of pedestrians crossing the cordon from 2006 onwards. Figures show a 6.9% fall in 2010.

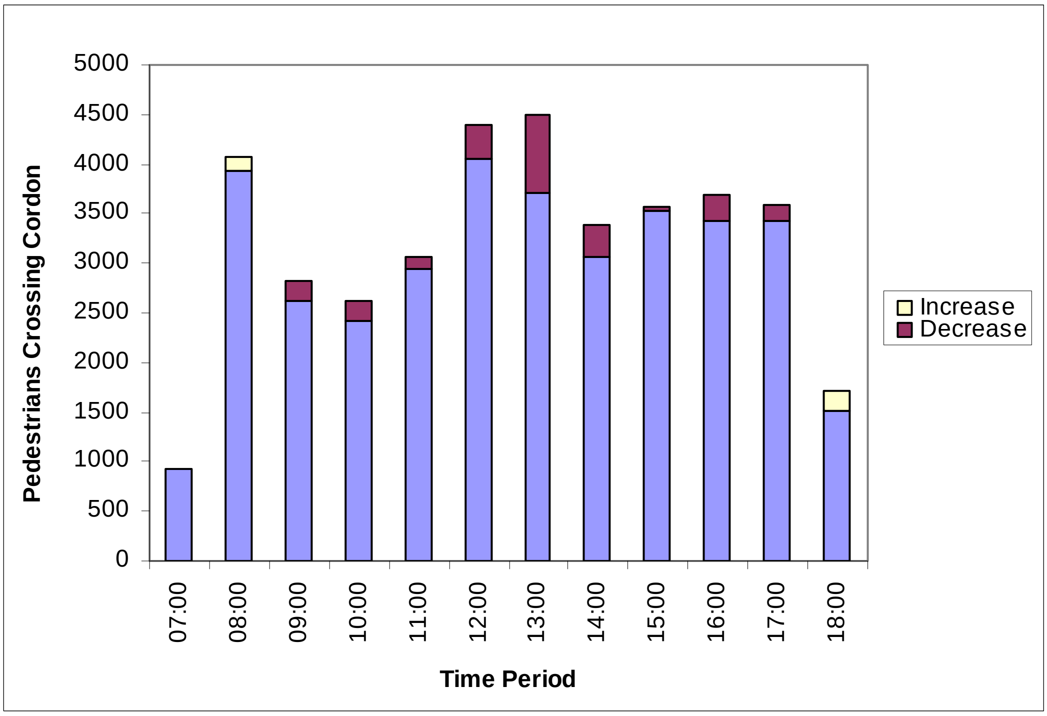
Figure 6 Pedestrians Crossing the Inner Ring Road Cordon



3.14 Figure 7 below shows the profile of pedestrians crossing the inner ring road cordon over the day, between 2001 and 2010. It can be seen that the morning and evening peaks are much less pronounced than for the cycle profile. This profile bears a greater similarity to the motor cordon than that of the cycles. High levels of walking occur throughout the working day indicating that people are walking into the city centre for shopping and leisure purposes as well as commuting.

3.15 The recent reductions in the middle of the day may be due to fewer shoppers walking to the city centre as the effects of the current recession continue to bite. Increases can be seen at either end of the day, suggesting an increase in walking as a mode of getting to work.

Figure7 Profile of Pedestrians Crossing Inner Ring Road Cordon 2001 – 2010



Bus Passenger Counts

3.16 Figures are only available for bus service use up until 2007. Surveys were undertaken on a cordon around the outer ring road to collect data on bus passenger numbers. The surveys were carried out each year over a 12 hour period (07:00 – 19:00) on weekdays in June and July.

3.17 The data in Figure 8 suggests that total number of bus passengers crossing the Norwich cordon increased by around 10,400 over a day in the ten years between 1997 and 2007. This represents an overall increase of 34%. The figures also show a big increase in park and ride passengers over this period. In 2007 over 9,000 passengers crossed the cordon. This is the largest number since monitoring began. In the last 5 years, new park and ride sites opened at Sprowston, Harford and Thickthorn. There has been an increase of over 1100 service bus passengers since 2007.

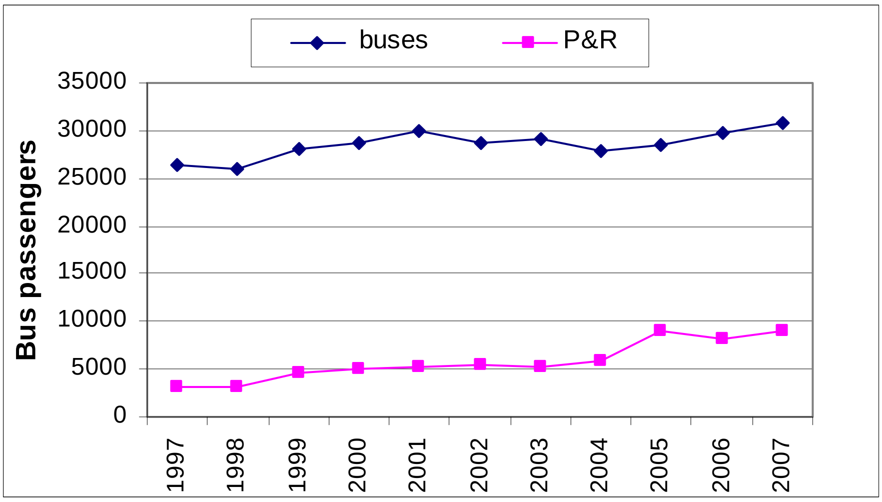
Figure 8 Outer Ring Road Bus Cordon Data

	Number of passengers		
Year	**Service buses**	**Park and Ride**	**Total**
1997	26353	3114	29467
1998	26092	3187	29279
1999	28182	4670	32852
2000	28693	5070	33763
2001	29875	5200	35075
2002	28651	5477	34128
2003	29029	5312	34340
2004	27773	5854	33627

2005	28571	8977	37548
2006	29725	8184	37909
2007	30833	9074	39907

3.18 Figures are only available for bus service use up until 2007. From1997 to 2007 surveys were undertaken on a cordon around the outer ring road. Figure 9 below shows bus passenger numbers and users of park and Ride crossing the outer ring road cordon.

Figure 9 Outer Ring Road Bus Cordon



3.19 Although the cordon counts of bus passengers are no longer undertaken, Norfolk County Council still record total passenger numbers on Park and Ride services in Norwich. These are shown in the figure below.

Figure 10 Park and Ride Passengers

	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11
No. of passengers	3,671,651	3,445,993	3,361,692	3,123,311	2,876,804	2,958,257

3.20 It can be seen that numbers have consistently declined over the period, although there was a small rise – nearly 3% compared to the previous year – in 2010/11. The decline is likely to be due to increasing competition from city centre car parks. Car parking provision in 2004/5 was severely reduced, whilst reconstruction of St Andrews multi storey car park was taking place and prior to Chapelfield opening (providing over 2000 spaces, all replacing previous provision). In addition, a number of car parks have reduced their prices in recent years to attract users (see section on City Centre parking restraint).

Parking Restraint

3.21 It was the 1998 NATS strategy that introduced the city centre parking restraint policy, and the ‘no traffic growth’ scenario was the driver behind a ‘no net increase in city centre public parking’ where any parking provided for customer/visitors to the city centre was expected to replace existing provision. This effectively ‘capped’ publicly accessible city centre car parking at 1995 levels (See Policy PK3 of NATS3 – published October 1998). Additionally, there is an aim of increasingly favouring short/medium stay use of central car parks to discourage commuting by car, with long-stay provision for drivers who do not have access to alternative means of transport near to their homes (primarily more rural dwellers) provided at ‘Park and Ride’ sites.

3.22 Subsequent to the publication of NATS3, work began on the City of Norwich Local Plan (finally adopted in 2004). Policy TRA21 gave a stronger statutory basis to the NATS policy on City Centre Car parking

City of Norwich Local Plan – Policy TRA21

Public off street parking provided in association with development in the City Centre will be subject to agreement on tariff levels which favour short or medium stay use. Any new short or medium stay provision within the City Centre (whether associated with development proposals or not), shall not result in public parking provision within the centre exceeding 1995 levels (10,002 spaces).

3.23 This Local Plan policy was subject to Public Inquiry in spring 2003 prior to the adoption of the Local Plan, and the 10,002 figure was supported by evidence of car parking provision which had been collected and which demonstrated the known provision in 1995. In addition, of course, the 10,002 figure was tested in a public arena, and accepted by the Inspector at the time. It should be noted that the car parking included in this figure is ALL parking within the defined City Centre that is available for visitors/customers to use in an ‘on-demand’ basis (in accordance with the NATS policy), and as a consequence includes parking primarily associated with retail units (for example at Sainsbury’s, and the Cathedral Retail Park). In addition, as the defined city centre in the adopted Local Plan included the recently developed Riverside area, the parking provision established there was also included in the figure. The original table on which this figure is based is no longer available, but Figure 11 below contains a table (created August 2011) which has been reconstructed from historical data, and demonstrates the accuracy of the original figure.

3.24 A review of the NATS Strategy commenced in 2004, and was adopted in 2006 (NATS4). As part of this review, following concern raised that there was not adequate parking in the city centre, the County Council's consultants, Mott MacDonald, undertook a study of city centre parking in September 2004. This study was restricted to the major public car parks, and excluded the semi-private ones referred to above. In addition, the St Andrews Car Park was under reconstruction at the time, so the study looked at usage of the remaining 6667 spaces. Taking account of population and job growth over the period to 2021, and the expectation of the reconstruction of two major car parks, the study concluded that demand for City Centre parking would reach saturation by 2021. This assumed no substantive adjustment in tariffs (some central car parks still operate at tariffs that are not unfavourable to long-stay demand), but that adjustment in tariff levels would encourage a shift towards more sustainable transport modes for current long-stay users, thus increasing availability of short/medium stay provision.

3.25 As the overall transport strategy for the City is to encourage such modal shift, increasingly favour short/medium stay use in the city centre car parks and not to permit increasing levels of traffic, policy DM29 seeks to maintain current levels of parking provision. In the medium term, assuming that the current trend for conversion of long-stay parking to short/medium stay continues the existing level of parking in the city centre will continue to be appropriate for increasing levels of population.

Figure 11

Type	Location of car park	No of spaces 1995*
Public	Assembly House	54
	Barn Road	145
	Bethel Street/Forum	213
	Bonds (John Lewis)	650
	Botolph Street	30
	Bull Lane	28
	Castle Mall, Farmers Avenue	300
	Castle Mall, Rose Avenue	710
	Chantry	60
	Chapelfield East surface (NCC)	17
	Colegate	94
	Edward Street	23
	Lower Clarence Road	280
	Magdalen Street	176
	Malthouse	390
	Monastery Court	55
	RCP Anglia Square	730
	RCP Anglia Square (surface)	138
	RCP St Stephens	280
	Oak Street	90
	Pottergate	27
	Queens Road	99
	Rose Lane	740
	Rouen Road	187
	St Andrews MSCP	1084
	St Crispins	80
	St Giles MSCP	330
	St Helens Wharf	134
	Unicorn Yard	100
	Unicorn Yard - contract	150
	Westwick Street	168
	Riverside MSCP[2]	738
Semi-public	Hollywood Cinema	31
	Riverside Surface[2]	1062
	Sainsburys Queens Road	370
	Toys R Us	242
City Centre total		**10005**

[1]: *Figures are reconstructed from data on file in 2011.*
There is a minor inconsistency between this recalculated 1995 figure, and the accepted level of spaces (10002)

[2]: *Not constructed until after 1995 but assumed in NATS and Structure Plan as part of base line*

Parking Standards

3.26 Norwich is a densely populated urban area, making it highly sustainable in transport terms. However, as a consequence there are limited sites for development, which are at a premium within the urban area. In 2001, PPG13 required Local Authorities to implement maximum parking standards, and these were duly introduced by the City Council in 2004, when the Local Plan was adopted. The most recent draft Planning guidance has suggested that maximum standards are no longer a national requirement, but should be determined locally.

3.27 With land at a premium, the City Council aims to maximise the beneficial use of land within its boundaries. Requiring the provision of unnecessary car parking where levels of car ownership and demand do not warrant it, or where provision would act as an encouragement of car use where alternatives are readily available would be contrary to the policy objective of NATS. This would also result in less development within the urban area, encouraging unsustainable development elsewhere. As a consequence, the Council proposes to retain maximum standards within the urban area of Norwich

3.28 The emerging National Planning Policy Framework (NPPF) suggests that when setting local standards for residential and non-residential development, local planning authorities should take into account:

- the accessibility of the development
- the type, mix and use of development
- local car ownership; and
- an overall need to reduce the use of high-emission vehicles.

3.29 In setting the parking standards, together with the ancillary requirements for servicing, and travel planning, the standards aim to maximise development potential, and minimise the transport impact of development

Residential Parking Standards

Advice in Manual for Streets (MfS)

3.30 Manual for Streets gives guidance on the provision of residential parking which says (paras 8.3.5-7 (extract))

- Car parking remains a significant issue for residents and house buyers. Many people feel that the design for a new residential development should accommodate typical levels of car ownership and that the level of parking in new developments is often inadequate for residents' and visitors' demands. There was a general feeling among buyers of new homes that apparent attempts to restrict parking in order to curb car ownership were unrealistic and had little or no impact on the number of cars a household would require and acquire.

- Provision below demand can work successfully when adequate on-street parking controls are present and where it is possible for residents to reach day-to-day destinations, such as jobs, schools and shops, without the use of a car. This will normally be in town and city centres where there will be good public transport and places that can be accessed easily on foot and by cycle. For residents who choose not to own a car, living in such an area may be an attractive proposition.

- One way of encouraging reduced car ownership is to provide a car club. Car clubs provide neighbourhood-based short-term car hire to members for periods of as little as one hour, and have been shown to reduce car ownership and use. To function effectively, car club vehicles need to be made available close to members' homes.

Car Ownership

3.31 The most comprehensive published information regarding car ownership in Norwich is the 2001 Census, and pending publication of the 2011 census, is also the most reliable. It is likely that since the publication of this census information that car ownership levels have changed.

3.32 Research undertaken by the RAC foundation has shown that between 1989 and 2006, there has been a steady increase nationally in household car ownership, with a gradual decrease in the percentage of zero-car households, down from 35% to 24%, and a corresponding increase in 2+ car owning households, up from 21% to 31%. During this period, the proportion of 1 car households has generally remained stable, at 44% to 45%. The census data for Norwich is around 2/3 of the way through this period, and demonstrates that across the City, car ownership levels are lower than those nationally.

Figure 12: car ownership (2001 Census)

	All households (h'holds)	H'holds (% of cars or vans): None	H'holds (% of cars or vans): One	H'holds (% of cars or vans): Two	H'holds (% of cars or vans): Three	H'holds (% of cars or vans): Four or more
Bowthorpe	3868	32.4%	48.8%	15.4%	2.7%	0.7%
Catton Grove	4170	32.2%	50.7%	14.4%	2.3%	0.4%
Crome	4158	33.5%	50.8%	12.8%	2.3%	0.6%
Eaton	3919	18.4%	50.9%	25.6%	4.1%	1.0%
Lakenham	4292	37.4%	47.8%	12.8%	1.5%	0.5%
Mancroft	4981	54.5%	37.5%	6.6%	1.0%	0.3%
Mile Cross	4270	38.1%	48.0%	11.6%	1.7%	0.5%
Nelson	4058	27.6%	51.6%	17.7%	2.6%	0.5%
Sewell	4643	32.3%	52.5%	13.0%	1.6%	0.6%
Thorpe Hamlet	4525	41.5%	45.5%	11.2%	1.4%	0.4%
Town Close	4726	39.9%	44.4%	13.2%	2.0%	0.6%
University	2697	34.7%	47.8%	14.5%	2.4%	0.7%
Wensum	4277	33.2%	47.9%	15.8%	2.4%	0.7%
City		35.5%	47.8%	14.0%	2.1%	0.6%

3.33 In 2001, the average number of cars per household in the City was around 0.85 cars. Central wards have much lower levels of car ownership than those on the outskirts of the City. The variation in car ownership, dependant on location is likely to have remained.

3.34 Assuming that the national trends have been reflected in Norwich, it would seem reasonable to assume that over the past ten years, the numbers of 'no car' households will have fallen to around 30%, the number if single car households has remained static, and the number of multi car households will have risen to around 20%. This would mean that currently the levels of car ownership on a per household level would be around 0.97 cars per household. The proposed standards will easily cater for this (a maximum of between 1.25 and 1.5 spaces per household on average), particularly in view of the required flexibility in allocation to cater for the limited number of households with more than two cars. New Census data for 2011 is anticipated to be available in July 2012.

Car Free Housing

3.35 There is no wholly effective way of requiring residents not to own a car, even if they move into a 'car free' scheme, but building these in highly accessible locations, where access to parking is difficult, and/or expensive, coupled with an availability of a 'car club' is likely to maximise the car free nature of the site.

3.36 Newly built properties (indeed any property constructed since 2004) are not eligible for parking permits within the Controlled parking Zones, unless the schemes have been particularly designed to operate with a permit parking scheme, and new parking spaces have been provided accordingly. Outside the Controlled Parking Zones, on-street parking is usually relatively freely available, and consequently, building' car free' in these locations would usually just result in increased on-street parking pressures as there is no pressure on potential residents to consider a 'car free' lifestyle. Only selected high density locations outside of the Controlled parking Zones, where parking is at a premium (such as around district centres), are therefore likely to be suitable for development that can reasonably be expected to be occupied as a car free or low car development. However, building new properties outside these locations with little or no car parking may be appropriate for other reasons (such as maintaining the character of a terraced street).

Car Club

3.37 There is a car club operating in the City (www.norwichcarclub.com) primarily from the City Centre and the inner suburbs. The car club was first introduced and operated by City Car Club supported by the CIVITAS initiative, but this operator decided not to continue with this operation, withdrew from the City in January 2010, having achieved a membership of around 150, and operating six cars.

3.38 Norwich Car Club operates nine cars, and is anticipating adding further vehicles during 2012. Membership levels are now similar to those achieved by City Car Club, (but the terms of membership are such that 'sleeping members' are discouraged) and membership is rising consistently. Information about the impact of the car club is limited because it is relatively young, and only eight members took part in the annual survey undertaken by CarPlus which assesses the impact of car clubs. However, the result of that national survey of car club users concludes that membership of a car club has a very significant impact on car ownership, and that previous estimates of a reduction of 20 privately owned vehicles per car club car is likely to be a conservative one. Currently, Norwich Car Club is in its infancy, and membership levels are only about 20 members per car (Nationally, where the largest clubs are now very well established) this is 50 members per car), the impact should already be about 7/8 vehicles per car (a total of around 60 fewer vehicles parked on Norwich's congested streets).

Non-residential parking standards

3.39 The current non-residential Parking Standards were introduced when the Local Plan was adopted in 2004, and the proposed standards represent an evolution form those. Adjustments have been made to relate the standards to defined areas of the City where varying rates of on and off-street parking restraint are in force, and to introduce requirements for charging points for electric vehicles.

3.40 The major element of the parking strategy for the City Centre is outlined above in paragraphs 3.21 – 3.25. As a general principle, the public off street car parks, and the (limited) on-street provision are expected to provide for all short/medium stay customer and leisure use needs within the City Centre. The provision of any parking within most of the primary retail core is, in any event, a practical impossibility, and it is similarly the case in fully pedestrianised streets outside of that area. Most of the on-street parking adjacent to this area is available to disabled drivers only.

3.41 The City Centre differs from all other locations within the urban area in that almost all public transport services (both bus and train) from throughout the Norwich policy area are focussed here, and substantial number of public on and off-street car parking is available. In addition, on-street provision is routinely made for servicing of business premises.

3.42 The provision of new commuter parking within the City Centre (whether directly associated with business premises or not) has not been permitted since 1995. The City's transport infrastructure is already at capacity during peak hours, and the encouragement of further private vehicle movements during peak hours, solely for the purpose of accessing the workplace, cannot be accommodated. Neither is it generally necessary, as the central area is accessible from all parts of the City, and much of the County by public transport, whilst walking and cycling are a realistic option for those living in much of the urban area. Long stay parking provision is available at 'Park and Ride' sites for those who live in locations where these options are not available.

3.43 In addition, there are particular practical problems associated with providing extensive parking within new central development. The City Centre has largely mediaeval street pattern and, as a consequence, streets are often narrow and are additionally constrained by historic buildings. The quality and importance of the historic fabric of the City Centre, both nationally and internationally, requires that new central development has to respect the historic character of the City, maintaining the historic relationship of building to the street in many cases. Additionally, the streets themselves are unable to cater for increasing traffic, which would in any case reduce the quality of the environment, to the detriment of the City as a retail, tourist and business destination

3.44 The proposed parking standards do, however, allow for 'operational' car parking for most premises outside the central retail core and require some provision for disabled drivers. Historically, it has often been the case on central sites that it is not physically possible to provide car parking even to the restrained levels allowed for in the parking standards.

3.45 Outside the City Centre, the parking standards are generally slightly lower than the national standards established in PPG13. These (with the exceptions noted above in paragraph 3.54) are the same as those that have been operating in the City since the adoption of the Local Plan in 2004. Outside the Controlled Parking Zones, providing levels of parking below anticipated demand does not act as a restraint, but results in increased on-street parking, which can cause issues for nearby occupiers. In these locations a balance needs to be struck between the efficient use of land, and the anticipated demand of the site for car parking. It is the case that some premises are occupied by users that have a substantially higher demand for car parking than is typical, but occupiers are routinely not known at the time a proposal is considered, and this makes any adjustment for particular sites impossible.

Travel Planning

3.46 Travel Planning is a recognised method of maximising the sustainability in transport terms of a development, dependant upon its location, but does require significant resources over time to implement properly, and consequently the requirements for Travel Plans are only really appropriate on larger scale developments with significant transport impact. Norfolk County Council has a specialist team that is able both to advise on travel planning and ensure that an agreed plan is properly monitored and reviewed. The threshold levels at which Travel Plans are required are based on advice from this team.

3.47 Below this threshold level, the Council is proposing to require 'Travel Information Plans'. These are a much simplified travel plan, ensuring that businesses provide basic transport information to their staff and customers about the travel opportunities available to their premises. This is to ensure that there is an awareness of the opportunities available, and a 'pro-forma' and information is available on the Council's website to enable this to be easily achieved on a self-service basis, whether or not a development proposal is being put forward

Major Roads

3.48 The main roads around the City carry the majority of private cars and buses, and act as significant corridors for pedestrian movement and cycling. In addition they are often the focus for other activity and act as local 'high streets'. The majority of accidents occur on the main road network, and these tend to be clustered at junctions.

3.49 Manual for Streets (MfS) and its 'sister' MfS2 provide a significant level of advice on how to ensure that streets, particularly those within urban areas are actively managed and improved to that they have a real sense of place. The Council's aim is to ensure that these streets maintain their function and continue to cater for the majority of the traffic in the urban area to avoid unnecessary diversion onto side streets and other unsuitable routes. The pressure on these routes and the limited capacity available means that it is often difficult to address the needs of all users entirely satisfactorily. Additional vehicular accesses onto these roads create additional delays to traffic, reduce road capacity, are potential barriers to pedestrian movement, and create additional safety risks. The limited capacity that is available on the main road network needs to be maintained so far as is practicable in order to maximise the potential for balancing the needs of the various demands that are places upon it.

Off-site works and mitigation of impact.

3.50 Following the 2001 advice in PPG13 that payments in lieu of on site parking were no longer valid (a strategy that had been in place in Norwich throughout much of the 1990s), it became essential to consider alternative approaches to developer contributions within the City. A new approach was formulated to take full account of the advice in PPG13, and the overall transport strategy for the Norwich during the evolution and adoption of the 2004 Local Plan. This current approach provides for contributions, either financial or ‘in kind’ that are directly linked to the number of private car movements that the development creates, giving each new traffic movement a ‘value’ equivalent to the cost of providing a ‘Park and Ride’ space, used as a proxy to calculate the cost of removing a single peak hour return car journey from the road network. The contributions have then been used to provide sustainable transport infrastructure supporting improvements to the cycle and pedestrian environment, and improvements to public transport infrastructure and the enhancement of the car club. These improvements have usually been in close proximity to the development in question, although contributions have been pooled in some circumstances and used to provide wider strategic infrastructure

3.51 These contributions are applied to all developments (both residential and non-residential) throughout the City, subject to defined threshold levels, and are likely to be overtaken at least in part by the implementation of the Community Infrastructure Levy (CIL). Until the introduction of CIL, contributions towards transport infrastructure improvements will continue to be achieved through planning obligations, subject to the usual tests.

3.52 CIL does not support NATS in the same way as the current transport contribution policy, which directly relates contributions to the net transport impact of the development. It is likely, however, to provide significantly enhanced levels of support for transport infrastructure generally that is consistent with the strategy. Where enhancements are desirable locally as a result of a particular development, it is anticipated that there will be a mechanism for identifying these, and an appropriate allocation from CIL will be made to provide them.

3.53 CIL will not, however, cover any improvements that are directly necessary for the development to operate or have acceptable levels of access. Improvements immediately around the site to link the development with its environment (which might include pedestrian/cycle crossings for developments in some locations) and which are only required as a consequence of the development being sited there will continue to remain outside the scope of developer contributions or CIL. Such improvements will be provided by the development in their entirety, and will be subject to appropriate agreements or conditions as necessary. Similarly, alterations or extensions to existing on-street traffic regulation orders may be necessary to facilitate a particular proposal. Where these are necessary, the cost of these will also fall to the developer, outside the scope of CIL.

4 Conclusion

4.1 NATS has aimed to stabilise traffic within the Norwich Area since 1998, with a series of policy initiatives designed to enable growth, whilst accommodating increasing demand for travel by means other than the car, coupled with continued investment in sustainable transport. This has been achieved by a combination of traffic management, the improvement/ provision of more sustainable transport options, parking control, and integrating transport strategies with land-use planning. Data from the last ten years demonstrate that these objectives have largely been achieved. The proposed Development management policies are thus an evolution of the current policies and are designed to complement the NATS strategy, to ensure that its objectives are met, not only through public investment, but through considered intervention in developments around the City.

Bruce Bentley, December 2011

APPENDIX 2 RETAIL AND TOWN CENTRE DEVELOPMENT TOPIC PAPER (draft)

1. Introduction

1.1 This topic paper is part of a series of background papers which provide the evidence base for the emerging Development Management Policies and Site Allocations development plan documents (DPDs).

1.2 These background papers will form part of the supporting documentation for the Regulation 27'submission' versions of both plans. It is anticipated that both plans will undergo a Regulation 27 'soundness' consultation in autumn 2012, and will be submitted to the Secretary of State for public examination early in 2013.

1.3 Some of the background papers may require updating at a later stage in the plan process to take account of changing government policy, and/or updated monitoring information.

1.4 The main purpose of this paper is to set out and justify:

- the detailed planning policy approach to retail, leisure and town centre development in the Development Management plan
- the main locations for retail growth identified in the Site Allocations plan

1.5 The main focus of this topic paper is on retail development for the city as a whole but it also addresses leisure uses and other town centre uses, including office, culture and tourism, in that they support the city's role as a regional centre and making the most of its distinctive assets. The multiplicity of retail facilities and supporting services which sustain the long term strength of successful city centres like Norwich are interdependent.

1.6 The paper outlines existing and emerging national policy and sub regional policy in the Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted in 2011 (JCS). The more detailed policies in the Development Management and Site Allocations plans are required to conform with both national policy and the JCS and to should enable implementation of strategic aims.

1.7 To provide a more complete overview in which to understand the proposed policies, this paper will also:

- Summarise the recent policy approach which has helped to bring about the success of retail and town centre policy in Norwich

- Provide up to date data on the retail centres in Norwich, with a major focus on the city centre

- Consider the relevance of the recent Portas Report on retailing to planning policy for Norwich.

2. Context

2.1 Norwich city centre is the region's highest ranking retail centre and is in the top ten nationally. The high ranking is based on a strong and attractive retail offer and the fact that the city has a large hinterland (see appendix, map 1) with a growing population, with the main competing centres at some distance.

2.2 As a major regional centre it has a wide range of shopping attractions as well as leisure and service facilities. It has an attractive environment and a unique identity and character, which all form part of its attraction to shoppers. Its "comparison[1]" shopping offer is exceptionally good, though the city centre's "convenience[2]" shopping offer is more limited.

2.3 Norwich generated £1.18bn of retail expenditure in 2010 as measured by CACI's retail rankings. It provides a strong and diverse retail offer in both high street multiples (with 6 department stores and two malls) and local independent/ speciality shopping (Norwich Market and the Lanes). It has relatively low retail vacancy rates despite the recession, and a strong and complementary leisure and evening economy. It has the highest proportion of its retailing in its centre of any major city in the country. In addition, it is a major regional centre for leisure, tourism and cultural facilities and an important office based employment centre. Retailing is the second biggest employment sector locally, with 20,000 employees or 11.9% of all employees in the greater Norwich area.

2.4 This success is in part the result of the long term policy approach, dating from the late 1980s, of promoting a strong, vibrant and diverse city centre, attracting high quality retail development to the centre whilst supporting it with a programme of continuous access improvements and enhancement of public spaces. To support this, policy has limited the spread of out-of-town retail development. Norwich's early pioneering of the "Town Centres first" policy approach helped to shape national planning policy in the 1990s. As a result of this, Norwich was commended by government in 2007 as an example of best practice for planning for town centres, with Ruth Kelly of the Department for Communities and Local Government stating "Look at the vibrant town centres in Guildford, Norwich and Newcastle. Let those who talk about

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[1] **Comparison shopping**: Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

[2] **Convenience shopping**: Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery

Ghost Town Britain see what the best local authorities are achieving when they plan for the future of their centres."

2.5 This policy approach has led to an increase of almost 50% to the city centre's overall retail floorspace offer compared with the situation in 1989. In the last two decades, two city centre malls (Castle Mall in 1993 and Chapelfield in 2005) have been developed. Improvements have been made to the market and the specialist shopping areas, particularly "Norwich Lanes". In addition, edge of centre retail warehouse facilities and supermarkets have been developed at Riverside and Queens Road. The main convenience stores are located on the periphery of the centre and provide a limited floorspace compared with centres of its size.

2.6 The success of this approach to promoting city centre retailing is reflected in the current national retail ranking of 9 (Venuescore 2010) in comparison with its rank of 45 in 1989 (Hillier Parker, *Shopping Centres of Great Britain, 1990)*.

2.7 Although Norwich has experienced a small reduction in retail floorspace in the last year, overall retailing has not suffered greatly from the recession and vacancy rates remain low in comparison with the national average.

2.8 In addition to the city centre, Norwich has a network of smaller retail centres which meet the more everyday shopping needs of the residents of the city. In recent years many of these have been strengthened by the development of small scale supermarkets and convenience stores.

2.9 Norwich also has two retail warehouse parks which provide locations for bulky goods retailing which can not be located in centres due to the nature of the goods they sell. There are also retail warehouse parks and large individual units beyond the city council boundary. The main parks are at Longwater and Sprowston.

2.10 Recently adopted policy in the JCS and the detailed proposed policies in the Development Management and Site Allocations Plans continue the successful "town centres first" policy that was pioneered in Norwich and has proved so successful. Some amendments to fine tune the approach have been made in the JCS and more are proposed in the DM policies. Therefore the policy aim is to retain the city centre as a major national retail centre and enhance its offer to meet the needs of a growing population for comparison shopping. At the same time, policy also aims to promote the vitality and viability of the smaller district and local shopping centres around the city to reduce the need to travel by car to out-of-town supermarkets to meet everyday "convenience" shopping needs.

3. Policy Context

National Policy

3.1 Existing national planning policy in Planning Policy Statement 1 (PPS1) requires development to be located so that it can be easily accessed by public transport. PPS4 requires the great majority of new growth to be located in existing centres to increase their vitality and viability and encourages competition between retailers to provide enhanced consumer choice.
PPS4 therefore requires planning authorities to actively plan for retail growth firstly by making better use of existing retail areas and secondly, where necessary, extending centres. It promotes the development of a local hierarchy of retail centres to ensure that large scale development is located in larger centres and everyday shopping needs can be met locally in smaller centres. It also promotes leisure development to be dispersed within large centres to broaden their attractiveness and enhance vitality, whilst allowing for concentration of late night activities.

3.2 Emerging national policy for retailing in the draft NPPF is not significantly different to existing policy in PPSs. The draft NPPF contains a section which is supportive of town centres as the preferred location for retail and leisure development as opposed to out-of town development. It recommends positive planning policies to promote the vitality and viability of centres to meet the needs of consumers for high quality and accessible retail services. It requires local planning authorities to recognise town centres as the heart of their communities and to pursue policies to support them. Similar to PPS4, the town centre should form part of a network and hierarchy of centres that is resilient to anticipated future economic changes. It also advises local authorities to "set policies for the consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres".

3.3 However, importantly for a city centre such as Norwich which relies heavily on the interdependence of a wide variety of currently defined town centre uses including employment, arts, culture, tourism and hotels to support retailing and leisure uses, the draft NPPF only requires the latter two uses to be located in centres. Under current national policy all town centre uses are required to be located in a 'Town centre first' location through a sequential test, which only allows alternative locations if no sites are available in centres. In addition, the draft NPPF makes the sequential test a preference rather than a requirement for local policies.

3.4 Norwich City Council raised concerns over the proposed changes relating to town centre uses in the draft NPPF consultation. More recently, the Select Committee Report into draft NPPF (available at http://www.publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1526/152602.htm has also picked up on these issues and advised that a "Town Centres first approach should be retained for all currently defined town centre uses.

3.5 It remains to be seen if any amendments are to be made on this issue in the final version of the NPPF, due in April 2012. Encouragingly, the Minister has indicated that he is minded to introduce changes to the draft NPPF reflect the concerns about 'Town Centre first' issues. Norwich City Council is confident it has the evidence to continue with a "Town Centres first" policy locally should it not be taken forward nationally.

Regional Policy

3.6 Since the government has signalled that the East of England Plan is to be revoked shortly, its policies are not referred to in this paper. However, the JCS, was written to be in compliance with the East of England Plan and reflects the status given to Norwich as a major regional centre and the role of Norwich as a retail, tourism, cultural, leisure, employment and education centre. On this basis the policy approach set out in the East of England Plan is effectively retained.

Sub – regional policy: Joint Core Strategy

The Evidence Base

3.7 The main evidence base for retail policies in the JCS is the Retail and Town Centres Study, completed in 2007. This section provides a précis its findings. Key recommendations of the study, taken forward through the JCS, are in appendix 2. The full study is available from www.gndp.org.uk

3.8 The primary output of the study is recommendations for how much increase in comparison and convenience retailing growth should be made in policy. The recommendations are based the potential increases in population arising from the growth and the projected increase in household expenditure on different types of goods, changing forms of retail and leisure provision and the impact of any increases in trade draw from competing centres. The growth in internet shopping is allowed for in projections of future expenditure. It concludes that:

- Continued growth in expenditure can be expected. The 2007 hinterland area used in the Retail and Town centres Study estimated the populations to be 795,674. Based on Norfolk County Council population estimates, a strong population forecast growth of 6% to

2016 is predicted, leading to a 2016 population of 841,518. In addition growth in customer spending was predicted;

- o intensification or expansion of the primary retail area of the city centre is needed to meet future **comparison** goods need of 16,000 square metres to 2011, 40,000 to 2016 and 68,000 to 2021;

- o **convenience** need in the city centre will largely be met through new supermarkets at Anglia Square, with need throughout the urban area estimated to grow by 3,567 square metres to 2011, 5,199 to 2016 and 6,961 to 2021;

- o other shopping areas within the centre should be strengthened to provide for **retail diversity**, with a particular focus on enhancing the character of specialist retailing areas and markets

- o the city centre is pre-eminent for leisure and cultural activities and there is a need to widen that range of facilities with further development of at least 11,600m² by 2021. A revised area is considered appropriate for leisure development, with a continued focus for late night activities at Riverside, Prince of Wales Road and Tombland.

The Joint Core Strategy

Vision and Objectives

3.9 The **Vision** for the JCS states:

Norwich city centre will build on its importance for key economic sectors including ……….. retailing. It will continue to be a UK ‘top-10’ retail centre

3.10 The **Spatial Planning Objectives** also cover retailing:

Spatial Planning Objective 3, “To promote economic growth and diversity and provide a wide range of jobs” recognises the importance of retailing to the local economy, stating:

> *Norwich city centre will continue to exert a powerful economic influence over the wider area. Its growth will be further encouraged, so that the centre remains one of the best in the country for retail and employment.*

Spatial Planning Objective 6: “To make sure people have ready access to services” promotes the role of both the city centre and district and local centres.

Norwich city centre will continue to provide a wide range of services accessible to a very wide area. The diversity, vitality and accessibility of the city centre will be maintained and enhanced. Investment will be encouraged in district and local centres to enhance accessibility, vitality and viability.

Spatial Planning Objective 7 “To enhance transport provision to meet the needs of existing and future populations while reducing travel needs and impact” promotes development, including housing, in and around sustainably accessible centres.

<u>JCS retail policy</u>

3.11 JCS retail policy is set out mainly through policies 11 for the city centre and 12 for the remainder of the Norwich urban area and policy 19, which provides the retail hierarchy. The full text of these policies is in appendix 1, along with the Key Diagram for the city centre.

Policy 11 Norwich City Centre

3.12 Policy 11 provides a clear strategy for the city centre to ensure that development supports its role as a regional centre and makes the most of its distinctive assets, most particularly its world class historic assets and its retailing. The strategy aims to continue the planning approach that has made Norwich recognised by government as national “best practice” for town centres as the area’s focus for retail and leisure, along with inter dependent employment and cultural development, with a significant element of housing and educational development to support this.

3.13 Therefore policy 11 promotes:

- Enhancement of retailing, with a substantial expansion of comparison retail floorspace and unit types to provide a range of premises
- Intensification and expansion of retail uses in the Primary Retail Area (identified schematically in the key diagram and defined on the DM policies Proposals Map)
- Other shopping areas being strengthened to provide for retail diversity, with a focus on enhancing the character of specialist retail areas and markets

Leisure policy promotes:

- Concentration of late night leisure uses;
- An expansion of early evening leisure and hospitality uses across the centre;

Enhancement of retailing is supported by:

- Strengthening city centre’s key strategic role as economic driver of the sub-region;
- An increase in employment opportunities in the city centre;
- Sustainable solutions to transport issues, with the city centre the hub of a Bus Rapid Transit network and through improvements to the public realm to promote walking and cycling;
- Making best use of Norwich’s historic and cultural assets;
- High density, mixed use development including a substantial element of housing.

.As well as the Primary Retail Area with its focus on providing locations for large scale comparison goods retailers, the key diagram identifies a number of shopping areas around the city centre as “Other Shopping Areas”. This reflects the large size of the city centre and the fact that it provides a variety of retail functions.

These are:

- The Large District Centres centred on Anglia Square and Riverside, which it is intended will meet the convenience shopping needs of residents of the north and east of Norwich and provide for a mix of activities. Currently Anglia Square lacks an anchor food store and a sufficient diversity of stores to meet this role, while Riverside’s focus is retail warehouse units and lacks employment. The policy therefore promotes further changes to enable this to be achieved, including a supermarket at Anglia Sqaure (see below).

- The Specialist retail areas of Norwich Lanes, Elm Hill and Magdalen Street, in which the aim is to continue recent success by promoting smaller scale, independent retailers and tourism functions

- Convenience shopping at Sainsbury, Queens Road, meeting some of the need in the south of the city. In the Local Plan, this was designated as part of the Primary Retail Area, but this has been amended through the JCS to ensure the main focus for comparison retail development is the primary retail area shown in the key diagram, particularly the St Stephens area

- The Cathedral Retail Park/ Barn Road – currently providing warehouse units (see below) and extensive parking, serving as a car based retail area.

To promote more sustainable retailing patterns, the JCS promotes long term change:

Anglia Square, and St Stephens areas are identified as areas for **comprehensive redevelopment** in the city centre policy, within which retailing will provide a specific focuses for change:

1. Anglia Square: Retailing along with commercial and housing development, housing, to be implemented through North City Centre Area Action Plan and enable regeneration of deprived area

2. St Stephens Commercial, retail, housing led redevelopment delivered through the St Stephens Masterplan and Site Allocations Plan

The key diagram for policy 11 also identifies **areas of change in** which the role of retailing will change.

Barn Road: Retail and commercial development with some housing, providing continuation and extension of Local Plan allocation to redevelop this gateway site through the Site Allocations Plan.

Riverside: office potential to make better use of extensive areas of surface car parking in retail area, redesignated as a Large District Centre in the JCS with supporting policy in DM18, as opposed to its previous designation as part of the Primary Retail Area in the Local Plan. The aim of this is to ensure the main focus for comparison retail development is the primary retail area shown in the key diagram, which is most accessible by sustainable transport. The reason for this change is that the evidence base showed that there are very few linked trips between Riverside, which acts as a car based destination and the rest of the retail centre, which accessed to a far greater extent by sustainable transport modes.

Taking a more cautious approach to the capacity for comparison retailing in Norwich than that proposed by the evidence base due to the onset of the recession, the JCS established that “opportunities will be sought for around 20,000m2 net of comparison goods floorspace to 2016. In the longer term, it stated “Retail need will be subject to regular monitoring and refreshed analysis to ascertain whether further new floorspace is required for the later JCS period.”

In relation to convenience shopping, it stated that the development of a food store at Anglia Sqaure would meet the majority of city centre need.

For cafe, restaurant and bar development, it stated at least 3,000m2 additional capacity should be provided by 2016.

Policy 12: The remainder of the Norwich urban area, including the fringe parishes

3.14 Policy 12 of the Joint core strategy sets out that local and district centres should be protected and enhanced:

Throughout the suburban area …………. opportunities will be sought:

- o for small-scale and medium-scale developments to increase densities, where a design and access statement demonstrates that an improvement to townscape will result, and particularly around district centres and on public transport routes

Policy 19: The hierarchy of centres

3.15 As set out in the national policy section, a hierarchy of centres has been established to ensure the right type of retailing is provided in the right centres, so that there is a range of easily accessible shops and services in an attractive and safe environment. This positive approach to the development of centres promotes local economic growth, investment in regeneration, social inclusion and widen consumer choice in centres accessible by a range of forms of transport.

3.16 The hierarchy of centres reflects the functions of and catchments served by each centre, the availability of offices, leisure, shops and services and their potential to accommodate growth as assessed by background evidence studies. The development of potential town centre uses will be provided for on a scale appropriate to the form and functions of, and the potentials for development identified by background evidence studies. Consequently development management policy includes thresholds for maximum scales of development in different types of centre.

3.17 The hierarchy within Norwich in line with JCS policy 19 is:

1. City Centre; this is a regional centre, serving a wide catchment and provides a wide range of interdependent activities including retailing, leisure, employment, culture, arts and tourism.

2. Large District Centres at Anglia Square/Magdalen Street and Riverside; these are important service centres providing a range of facilities, broadly equivalent to a town centre such as Wymondham;

3. District Centres such as Bowthorpe are groups of shops often containing at least one supermarket or superstore, and a range of non-

retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library;

4. Local Centres such as Grove Road provide a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette.

3.18 The centres are mapped in appendix 3.

Local Policy

Current Local Policy

The Community Strategy

3.17 The city's planning policies are the spatial expression of policy set out in the **Community Strategy.** This demonstrates a strong commitment to maintaining and regenerating the city centre and district and local centres in the objectives to:

- o "support development of a vibrant city centre"
- o "ensure a strong economic component in neighbourhood renewal and regeneration".

Planning Policy

3.18 Existing retail planning policy is in The **City of Norwich Replacement Local Plan (2004)** and in the **Joint Core Strategy,** as set out above**.** Local Plan policy will be replaced by the emerging policies in Development Management and Site Allocations documents. The Joint Core Strategy forms the strategic policies which the emerging detailed policies must comply with.

3.19 Summaries of saved Local Plan policies are in appendix 4. The table sets out existing Local Plan policies, issues that have risen in relation to these polices since their adoption in 2004 and how they are being taken forward through the JCS and the emerging Development Management policies and the Site Allocations Plan.

4. Emerging Policy

The draft Development Management policies

4.1 Four retail policies are included in the plan:

- o DM18 promoting and supporting centres
- o DM20 Management of uses – city centre
- o DM21 Management of uses - district and local centres
- o DM25 Retail warehouses

4.2 This section summarises and sets out the aims of these policies.

DM18 promoting and supporting centres

4.3 DM18 supports town centre uses within the city centre and other centres in Norwich, to enhance their diversity and to help achieve sustainable economic growth. It does this by ensuring that:

- Retailing and other town centre uses are focussed in defined centres, as these are accessible by sustainable modes of transport or locally on foot.

- The right scale of development is located in the right centres: the city centre is the preferred location at the top of the hierarchy to accommodate the full range of facilities serving the greater Norwich area, whilst district and local centres lower down the hierarchy are appropriate locations for smaller scale locally based facilities.

- DM18 provides further detail for Riverside, to support its designation as a Large District Centre in JCS policy 19 and to enable a greater mix of activities as promoted by JCS policy 11 and better integration within the city centre. The policy therefore requires any further retail development to significantly strengthen the linkages between the city centre and the retail park through stronger public transport connections and enhanced pedestrian and cycle links.

- Most significantly, the policy retains the "Town Centres first approach". The mechanism is the use of the "sequential" and "impact" tests. These only allow town centre uses to be developed outside centres where there are no sites available in or on the edge of centres, and that there will be no negative impact of the development on centres. This continues the current national and Local Plan approach. It remains to be seen if this will be in compliance with the NPPF, as the draft only applies this approach to retail and leisure uses. Norwich City Council is confident that if the final NPPF does not apply this approach to all town centre uses, the need to retain this policy in Norwich can be proved at an examination. Allowing unmanaged dispersal of selected uses such as visitor accommodation and large scale office employment would increase the need for unsustainable travel and damage prospects for the regeneration and enhancement of the city centre and neighbourhood centres. This would be directly contrary to the Joint Core Strategy. .

DM20 Management of Uses – City Centre

4.4 The purpose of this policy is to promote further regeneration of the city centre, as set out in policy 11 of the Joint core strategy, balancing the priorities between different town centre uses. The policy continues the Local Plan approach for retail frontages and thresholds, providing the necessary detail to implement JCS 11.

4.5 The aim is to retain a substantial proportion of shopping within the core shopping streets and key attractors of Castle Mall and Chapelfield whilst accepting a diversity of uses in the speciality and local independent shopping areas and secondary shopping streets.

4.6 The primary and secondary retail areas and Large District Centres are shown in map 2. Though not shown on map 2, the proposals map will also define retail frontages. The primary frontage includes a high proportion of retail uses (85%). The secondary frontages provide greater opportunities for a diversity of uses to encourage a greater mix of town centre uses. Thresholds are specific to each frontage to promote their roles in the hierarchy. .

4.7 The policy allows for flexibility in both the primary and secondary retail frontage areas to help to achieve the strategic aims of JCS policy 11. Thus change of use to restaurants and cafes may be permitted if thresholds would be exceeded if it helps to achieve these aims. This provides further detail to the revised JCS approach to cafes and restaurants which has already proved successful – examples include new restaurants on Chapelfield Plain and in the Royal Arcade.

4.8 This does not apply to financial and professional services (A2), drinking establishments (A4), hot food takeaways (A5) and other town centre uses as they do not add to vitality and viability. Particular account will be taken of the need to encourage and protect speciality and local independent retailing and supporting services within areas such as the Norwich Lanes.

4.9 In line with a recommendation of the Portas Report (see section 7), the policy allows for temporary use of vacant shop units for community uses.

4.10 In response to changing economic circumstances, where an area or premises suffers from long term vacancies, permission may be granted for non retail uses where this would have a beneficial effect on the vitality of the area.

4.11 To promote diversity and vitality, the policy also promotes the use of upper floors and basements for other town centre uses and housing outside defined retail frontages.

DM21 Management of Uses – District and Local Centres

4.12 DM21 provides the detail to enable the JCS policy 12 requirement that local and district centres should be protected and enhanced to be implemented. It aims to ensure that a suitable range of uses is maintained within these centres to provide for people's everyday needs.

4.13 The Council's approach to local and district centres is to seek a balance between protecting retail uses at ground floor level, whilst also allowing other town centre uses which complement and are appropriate to the role and size of the centre. A graduated threshold approach is used to take into consideration the different functions of Norwich's local and district centres, with a 60% threshold for shops in district centres and a 50% threshold in local centres. This is a change to the Local Plan, which set the same threshold, 60%, for all centres.

4.14 The policy allows some flexibility so where the proportion of non retail units has exceeded the threshold, as permission will be granted for town centre uses where it can be demonstrated that the use is underrepresented in the centre or it is for a community use that cannot be accommodated in or adjacent to the centre.

4.15 As required by national policy and the JCS, the policy also promotes the development of centres as hubs. Thus higher density residential development around them is promoted, along with intensification of existing uses, including the use of upper floors within centres for residential, offices, restaurants and cafes, drinking establishments, non-residential institutions and leisure uses, whilst preventing conflict of uses.

Policy DM25 Retail Warehouses

4.16 The evidence base showed there is no need for extra retail warehouse development in the city. The policy therefore aims to restrict development on the retail warehouse parks to bulky goods only and to prevent other forms of retail development on these sites.

5. Site Allocations Plan

5.1 The following sites are proposed for inclusion,for retail and leisure uses in the Site Allocations plan. The sites are classified under the likely major type of use. Floorspace assumptions are only given for those sites where the St Stephens Masterplan has provided an indicative retail floorspace figure. Together, these total 2,570 m^2.

Comparison retailing

- St Stephen's Towers (M012) – Primarily retail (with cafes/restaurants) development with office and residential on upper floors

- St Stephens Street and Westlegate (M013) – Ground floor retail with office on upper floors

- Westlegate Tower (M023) – Ground floor retail with office and residential use upper floors (indicative retail floorspace proposed as in St Stephens Masterplan - 680m^2)

- Fire Station (M035) – Mixed use development with possible retail floorspace

- Barn Road Car Park (M036) – Retailing with office/residential

- *St Stephens Road and Malthouse Road West (M060[3]) – Mixed use with retailing on ground floor and wider mix on upper floors*

- Norfolk House (M061) – Possible a mix of retail/leisure/office on ground floor and a mix of residential and offices on upper floors.

Leisure Uses

- Chantry Car Park (M024) – Mixed use including retail and leisure on ground floor and wider mix of uses on upper floors (indicative retail floorspace: 1,420m^2)

[3] This site has been occupied by Wilkinson Store recently and it is not likely that future development will be taking place as indicated in the St Stephens Masterplan

Convenience retailing

- o Anthony Drive/Sprowston Road (M019) – Convenience retailing with housing (extension to existing Local Centre)
- o Hall Road District Centre (M038) – New district centre comprising large convenience retail floorspace and other community and leisure uses
- o Land at Aylsham Road (M039) – comprehensive mixed usedevelopment with some retail provision on the street front
- o Ber Street and Rouen Road (M034) – Mainly housing with possible retail element

5.2 In addition to the above sites, it is anticipated that significant retail and leisure development will take place through the intensified use of existing sites, as has recently happened in the city centre at Marks and Spencers, or, if necessary additional extensions to the Primary Retail Areas.

5.3 The site allocations and the policy flexibility the policy flexibility to enable both intensification of existing sites and expansion of the Primary Retail Area therefore meet JCS and national policy requirements.

6. Recent national reports and Monitoring

Summary of main findings recently published national reports in relation to Norwich

6.1 This sections updates information since the Retail and Town Centres Study, part of the evidence base for the JCS, was undertaken in 2007. It uses both data from national reports and from local monitoring to assess how retailing in Norwich is performing in a time of national economic slowdown and to assess progress against JCS planning policies and targets.

6.2 A number of companies produce national retail rankings and reports, each using slightly different methodologies and data sources and assess trends in retailing. The following section includes data from a number of different national reports to provide an up to date overview of retailing in Norwich, looking at trends and comparators, and in some cases draws conclusions based on the data.

Retail trends for comparison shopping

6.3 NSLSP Comparison Goods Report, Shopping Locations of Great Britain: The Winners and Losers is based on surveys to identify **trends for comparison retailing** between 1998 and 2009

It identifies:

Longer trips: there has been an overall trend to less frequent longer car based trips, with an increase in average trip spends, benefitting larger centres like Norwich. Thus there has been an overall for larger centres to grow at the expense of smaller ones. However, this is not always the case in areas of major growth e.g. Dereham,as well as Norwich, has experienced a significant increase in retail trips.

Home shopping: the impact of home shopping on comparison goods sales in the retail centres is very minor and is likely to remain so. There is a very strong correlation between:

- the availability of shopping locally and home shopping penetration e.g. home shopping market penetration is high on the North Norfolk coast, but low around Norwich.
- home shopping and income band – the lower the income, the more people home shop.

Perception of **High Street decline** is something of a misnomer – the least successful centres tend to be those which do not provide adequately for accessibility and do not provide varied types of space to meet retail sector comparison goods productivity requirements. Nationally, 60% of retail centres grown and in shopping population and 40% have decreased.

6.4 There are 3 key drivers to shopping population change at the local level:

1. Retail mix change (usually facilitated by development activity)

2. Accessibility change (commonly caused by transport development or transport cost change)

3. Population change

National comparisons

6.5 The following bullet points include data from a number of sources to enable comparison of Norwich with other top national retail destinations:

- In 2010, Norwich had the lowest retail vacancies (8.4%) of large centres in England (average 14%) Source: Local Data Company mid 2010

- Norwich is 9th nationally in the league table (based on numbers of multiple retailers), predicted to rise to 8th by 2016 by overtaking Brighton (source Javelin Venuescore 2011-12);

- Norwich is the only “Major City Regional” retail centre in recent years to increase its “shopping population” as it has limited competition and its hinterland has experienced significant population growth. “Cities Outlook 2011” reported that over the period 1999-2009 Norwich had the 4th highest population growth of any UK city. Due to this relative isolation, achieving higher market share rates would require a radical increase in the scale of the shopping present, though population growth will generate an increase in shopping population (source NSLSP Comparison Goods Report);

- Norwich has the most dominant city centre in the country – i.e. it highest proportion (72%) of its retailing in its city centre. The next highest are Hull and Southampton at 50% and the lowest Bristol, London and Sheffield under 30%; (source Javelin Venuescore 2011-12);

- Norwich has a relatively low proportion of shops in malls at 31%, the third lowest of the top retail 20 locations in the country, Birmingham is the highest at 60%. There may be scope for more mall development in Norwich (source Javelin Venuescore 2011-12).

- Norwich has a demographic profile that is some way above the positioning of the retail offer; this shows that there is some scope for higher end retail development to address the imbalance (source Javelin Venuescore 2011-12).

- A low proportion of Norwich's retailing is tourism related. The study shows Norwich's proportion is below the average for the top 20 retail locations and the lowest of all the other top national retail10 locations (which includes both Leeds and Birmingham). This provides additional evidence on the need to both promote the positive approach to tourism development through JCS policy 11, including focussing investment on measures which support tourism (source Javelin Venuescore 2011-12).

- Norwich has a low proportion of food shops. It is classified as providing retailing mainly of a mid "market position", mainstream "fashion market" and the mid "age position" classification.

Regional comparisons

6.6 Both Ipswich and Cambridge are significantly below Norwich in the retail league tables, with smaller hinterlands. However, Cambridge has seen major city centre investment in recent years , provides more "Upscale" retailing and has a significantly better tourism offer. Bidwells Data Book 22 shows that:

- Norwich has significantly higher amounts of retail floorspace than its competitors;

- Vacancies are lower (and decreasing) in Cambridge than in Norwich, but higher in Ipswich;

- Returns and rents are higher in Cambridge than in Norwich, but lower in Ipswich.

Table 1 Comparative figures for City Centre retailing

Urban area	High Street Retail (square metres)	Vacancies%	Returns (%)	Prime Rent (£ per square metre per year) and change
Norwich	194,260	11	10.3	17 (unchanged)
Ipswich	129,786	19	-3.4	10 (decrease)
Cambridge	142,142	5	14	21 (decrease)

Source; adapted from Bidwells Data Book 22

6.7 Data for retail warehouses shows:

- Despite the long term policy approach to strengthen the city centre, Norwich has the highest amount of retail warehousing of the three centres, much of located outside the city council boundaries, particularly at Longwater and Sprowston

- Vacancies are lower in Norwich

- Returns and rents an re lower in Norwich and Ipswich than Cambridge

. Table 2 Comparative figures for retail warehouses

	Retail warehousing (square metres)	Vacancies %	Returns %	Prime Rent (£ per square metre per year)
Norwich	111,614	7	14.7	2 (unchanged)
Ipswich	94,891	21	14.7	2 (unchanged)
Cambridge	52,239	15	20.6	3 (increase)

6.8 Analysis of the national and regional comparison data shows that with the significant population growth predicted for the area, and the predicted growth in average incomes, there is long term potential, as required by the JCS, to increase the amount of comparison goods sales. In addition, there is the potential for the nature of retailing to change in Norwich, to focus more on visitors and tourism and to provide more “upmarket” retailing. It also confirms the conclusion that further retail warehousing development is not necessary and that it is necessary to continue to improve accessibility to, and the environmental quality of, Norwich City Centre to retain its excellent retail offer and enhance it as a visitor centre as retail spending increasingly becomes focussed on centres with a broad offer.

Retail monitoring

City Centre

6.9 The 2011 JCS Annual Monitoring Report concluded that:

- Norwich has successfully reached its target of being in the top ten centres nationally. The improved national retail ranking suggests that Norwich as a centre has faired relatively well compared to other places across the country.

- There has been a small year-on-year net loss of retail floorspace in the city centre over the last three years, amounting to a decrease of 0.7% of total floorspace. Given that the target is to deliver 20,000 sqm of new comparison goods floorspace in the ten year period 2007-2016 this indicator is not achieving its target. However, since these figures cover the period of recent economic recession, retailing in the city has been remarkably resilient to national trends for high retail closures. To a minor extent, the fall also reflects the new more flexible JCS approach to promote the early evening economy.

- Current vacancy rates in Norwich are 7.8% which is considerably better than results from 2009/10 when the result was 9.2% but not dissimilar to results in either 2007/08 and 2008/09 indicating that the City Centre has ‘bounced back’ relatively well in response to the ‘credit crunch’ and resulting recession. However, since the target is for Norwich City Centre have vacancy rates not higher than 5%, the indicator’s target is not being achieved at present.

Frontages

6.10 More detailed analysis of the frontage data for the saved Local Plan policies showed that the city centre frontage indicator did not meet its target. The proportion of shops compared to other uses is now below the Local Plan target in six parts of the city centre. However, this is also a reflection of the change in policy brought about JCS policy 11 for the city centre to, encourage evening economy uses across the city centre.

Comparison Retail and Leisure Completions

6.11 JCS policy 11 established that opportunities should be south for 16,000 square metres of extra comparison retailing in the city centre to 2016 and for 3,000 square metres of leisure development. The expectation was that the development of a supermarket ast Anglia square would meet the majority of convenience need.

6.12 Since 2007, due to the recession, there has actually been an overall decrease in overall city centre floorspace of 1%. Comparison floorspace has decreased by 12,676 square meters, nearly 7%. At the same time, convenience floorspace has increased by 10% and there has been an increase of 12% in the number of café and restaurant units (see tables 3 and 4 below). At present, it is not possible to provide information on the increase in floorspace for cafes and restaurants, though this will be addressed in forthcoming monitoring prior to the submission of the DM and Site Allocation Plans.

Table 3 Change in comparison and convenience floorspace, 2007-11

Survey date	A1 Shops	A1 Convenience Shops, (square metres)	A1 Comparison Shops (square metres)
July 2007	1837	14,912	186,483
January 2011	1865	16,351	173,807
Change 2007-2011	+ 28 (+1.5%)	+1,493 (+10%)	-12,676 (-6.78%)

Table 4 Change in the number of city centre units, 2007-11:

Survey date	Total number of units	A1 (Shops)	A2 (Financial and Professional services	A3 Restaurants and Cafés	A4 Drinking Establishments	A5 Hot Food Take-Aways
July 2007	1837	1091	179	151	86	42
January 2011	1865	1067	180	163	88	43
Change 2007-2011	+ 28 (+1.5%)	- 24 (-2.2%)	+ 1 (+0.5%)	+ 12 (+7.9%)	+ 2 (2.3%)	+ 1 (+2.4%)

Note: 12 units (net) have gone to other uses e.g. housing, leisure

District and Local Centres

6.13 A retail survey is carried out of all defined local and district centres each year. Though vacancy rates remain higher than pre recession rates, the major increase in district centre vacancies in 2010 was reversed, whilst local centre rates remained stable. The proportion of non retail uses in both local and district centres continued to rise.

Table 5 District and Local Centre vacancies, 2006-2011

	Vacancies		**Non-retail units**	
Year	District centres	Local centres	District centres	Local centres
Apr-11	6.60%	8.20%	43.70%	43.50%
Apr-10	12.09%	8.60%	40.00%	39.00%
Apr-09	3.50%	8.90%	36.90%	38.30%
Sep-08	3.10%	7.40%	36.50%	39.10%
Sep-07	3.10%	5.80%	39.20%	35.70%
Sep-06	2.30%	4.80%	38.50%	34.60%

6.14 In recent years there have been significant changes in national convenience retail trends. There has been a recent and growing national trend in convenience retailing for customers to shop at out-of-town supermarkets less and to use home delivery for their main convenience goods purchases at district and local centres on a regular basis for top up purchases, using a more diverse range of shops. This trend is most prevalent among younger customers and is variously attributed to rising petrol costs, poor customer experience in hypermarkets and lack of time for shopping.

6.15 Phillip Clarke, chief executive of Tesco, has recently stated that the company will now open fewer out-of-town supermarkets. Retail analysts have suggested how this emerging trend likely to affect convenience shopping:

- Specifically relating to Tesco, Dave McCarthy, of Evolution Securities, commented “Tesco is cutting back on the new space devoted to non-food and will no longer be opening large 100,000 square foot (9, 300 square metres) hypermarkets. The grocer will now focus on convenience stores and supermarkets sized between 40,000 square foot (3,700 square metres) and 60,000 square foot (5.600 square metres).” (source Independent (13/1/12).

- Andrew Simms, of the New Economics Foundation, commented on more general trends “The age of the monthly or fortnightly supershop is gone. And the future, driven by both choice and necessity, will be one of greater diversity and plurality. The supermarkets will not have it their own way in the future in the way they have had it for the last 15 years" (source: The Guardian, 13/1/12).

6.16 These trends has been apparent in the Norwich area, with a major increase in convenience stores in local centres and small supermarkets in district centres and relatively low vacancy rates despite recession, particularly in those centres with an "anchor store." Averaged over the period 2006-2011, vacancy rates are lower (5%) in those centres with convenience stores (of over 250 m2) compared to 6.5% in those without. Although there have been extensions to existing large supermarkets, and there are proposals for medium scale supermarkets at Hall Road and Anglia Square within the urban area, there have been no proposals for further out-of-town superstores in recent years.

6.16 Overall, the increase in convenience floorspace, (see table 6 below) has already exceeded the predicted need set out in the Retail and Town Centres Study 2007. This has largely been the result of the development of convenience stores and small scale supermarkets and extensions to existing large scale stores outside Norwich, but within the Norwich urban area. Implementation of planning permissions for supermarkets will lead to over provision in comparison with the 2007 estimate of need.

Table 6 Convenience Retail development since 2007

Scheme	**Floorspace (square metres net)**	**Hierarchy location**
Completed		
Aldi, 180 Plumstead Road*	1605	Edge of District Centre
Aldi, 1 Larkman Lane (extension to existing store)	228	District Centre
131 Colman Road (Bunnett Square) Co-op	390	Local Centre
Tesco Express, 84 Unthank Road	469	Edge of Local Centre
Tesco Express Westlegate	180	Primary Retail Area, permitted change of use
Tesco Express 131 Dereham Road	200	Not in centre, permitted change of use
Tesco Express The Firs 164 Cromer Road	280	Not in centre, permitted change of use
Tesco Express 45-49 Prince of Wales Road –	220	Not in centre, permitted change of use
Tesco Express 279 Aylsham Road	262	District Centre
Budgens Wensum House, Prince of Wales Road	250	Not in centre, permitted change of use
Sainsbury Pound Lane	800	District Centre, Broadland
Sainsbury Longwater	1,483	Not in centre, South Norfolk
Total	6,367	
Permitted, not yet developed		
Harford Place, Hall Road	3,174	Allocated District Centre
Anglia Square	2,464	Large District Centre
Total	5,628	
Overall total (completed and permissions)	11,995	

6.17 The high delivery of new convenience stores and small supermarkets in local and district centres, is thus a success in that it has enabled the more sustainable patterns of local shopping promoted by national and local policy and a reflection of national trends. This has increased competition, without leading to a significant increase in vacancy rates at smaller centres. JCS policy states no further out-of-town convenience stores are needed and the high levels of completions provide the justification for objection if any further out-of-town supermarkets are proposed. However, it is recognised that, in the light of the high level of convenience shopping completions and permissions in recent years, there is potentially a need for revised convenience capacity forecasts

Uses in District and Local centres

6.18 Table 7 below shows the uses available in district and local centres in 2010. It demonstrates the high representation of retail units providing newsagent services and hot-food takeaways in all defined centres. Approximately half of the centres had small supermarkets/convenience stores, post offices and pharmacies and the number with public houses is falling.

Table 7 Facilities in District and Local Centres, August 2010

Centre name	Superstore (>2,500 sq.m.)	Supermarket (<2,500sq.m.)	Banks (A2)	Restaurants	Café	Library	Newsagents	Post office	Pharmacy	Hot-food takeaway	Launderette	Pub
Bowthorpe Main Centre		■	■		■		■	■	■	■		■
Drayton Road		■					■	■		■		
Eaton Centre		■	■		░		■		■	■		■
Plumstead Road		■	■				■		■	■	■	■
Aylsham Road/Mile Cross Road		■	■				■	■	■	■		
Earlham House		■			■		■	■	■	■		
The Larkman		■					■	■	■	■		
Hall Road/Trafalgar Road					■		■					
Hall Road/Queens Road							■	■		■	■	■
Hall Road/Southwell Road		■			■		■			■		
Grove Road		■			■		■				■	■
Suffolk Square					■		■	■	■	■	■	
Unthank Road		■	■	■	■		■		■	■	■	■
St Augustines Gate		■					■			■		
Dereham Road/Distillery Square		■			■		■	■		■	■	
Aylsham Road/Junction Road							■			■		
Aylsham Road/Glenmore Gardens			■				■			■		
Aylsham Road/Boundary Road							■			■		■
Woodcock Road							■			■		
Catton Grove/Ring Road							■	■		■		
Magdalen Road							■			■		
Sprowston Road/Silver Road					■		■					■
Sprowston Road/Shipfield			■				■			■		■
Bishop Bridge Road							■			■		
Earlham West Centre						■	■		■	■		■
Colman Road/Avenues		░	■				■		■	■		■
Colman Road/The Parade							■	■	■	■		
Woodgrove Parade							■		■	■	■	
St John's Close/Hall Road							■		■	■		
Tuckswood Centre							■	■		■		
Witard Road		■					■					
Clancy Road							■			■		

Key

■	Use present
░	Use has permission

7. The Portas Report

7.1 The Portas Report (December 2011) into the future of Britain's High Streets made a number of recommendations related to planning and the management of town centres. The following table sets out the main applicable recommendations and summarises the approach taken by Norwich City Council to specific recommendations. This shows that the Portas recommendations generally reflect the best practice for retailing that has been established in Norwich for a number of years.

Table 8 Portas Recommendations in relation to Norwich

Portas Recommendation	**National or Local Initiative**	**Norwich City Council approach**
Planning Related		
Focus on making high streets accessible, attractive and safe	Local	Covered in JCS, particularly policies 6, 7, 11, 12 and 19
Put betting shops into a separate "Use Class" of their own	National	Proliferation of betting shops not currently a significant issue in Norwich, but change in Use Class Order would be welcome
Make explicit a presumption in favour of town centre development in the National Planning Policy Framework (NPPF)	National	Long standing policy approach in Norwich. National "Town centre first" presumption not in draft NPPF, therefore will be incorporated in Local Plan if not made national policy
Introduce Secretary of State "Exceptional sign off" for all new out-of-town developments	National	Such a change would be welcomed, but need to resist out-of –town development covered in JCS policies 11 and 19
Promote the inclusion of the high street in Neighbourhood Plans	Local	Already covered by JCS
Local authorities should use Compulsory Purchase Orders to encourage the redevelopment of key high street retail space	Local	Such powers already exist though have not had to be used up to now. Partnership approach preferred.
Other key recommendations		
Put in place a "Town Team": a visionary, strategic and strong management team for the High Steet	Local	Norwich has had such a team for a number of years.
Local Areas should implement	Local	More suitable to smaller centres. Focus in

free controlled parking schemes		Norwich on promoting good quality public transport access, whilst allowing for car access and focussing parking in larger car parks, redeveloping surface car parks (generally for retail uses)
Explore disincentives to prevent landlords from leaving units vacant	Local	Positive approach using vacant retail units for temporary uses eg art

8. Conclusions

8.1 The evidence included in this report provides background information to inform the retailing policies in the emerging Development Management Policies Plan, and the retail allocations in the emerging Site Allocations Plan. It shows that they meet the requirements national policy and the JCS and that they generally continue the successful approach of the Replacement Local Plan, though with slight amendments to take account of recent changes in circumstances.

8.2 To maintain and build on the proven success of Norwich's planning strategy the council considers it necessary not only that the majority of retail and leisure services should remain located sustainably and accessibly in the centre of Norwich, but also to have policies in place to keep people living and working there, to sustain and expand a strong city centre employment base and to encourage a complementary, diverse and beneficial range of hospitality, arts and cultural services and visitor accommodation to keep the city centre thriving, vibrant, competitive and attractive. A strategy which sought to retain retail and leisure uses within centres but allowed the dispersal of other facilities to less sustainable out of centre locations would be likely to seriously undermine the objectives of the Joint Core Strategy.

8.3 JCS policy provides a robust policy approach, with a suitable focus on both increasing comparison goods offer in city centre (though this is at present not happening due to recession) and to promote all round offer of Norwich, such as increasing its role as a visitor and tourist centre. This approach is based on a firm evidence base from 2007 and recent monitoring and analysis of trends and data confirm that this approach for convenience goods should be continued. Data shows that there needs to be a particular focus on promoting Norwich as a visitor and tourist centre.

8.4 It may be necessary to revisit convenience forecasts in the light of high level of completions and permissions in recent years. However, since the great majority – such development has been in sustainable locations this reflects both the success of the existing policy approach and a changed trend in national convenience shopping patterns. JCS policy states that no further out-of-town convenience is needed and the high levels of completions provide further justification for this.

8.5 The production of an evidence base is an iterative process. This topic paper, and others in the series, will require updating prior to submission stage in 2013. This will need to take account of updated monitoring information, the sustainability appraisal reports for both plans, and changes to national planning policy.

Appendix 1 JCS Policies

Policy 11: Norwich City Centre

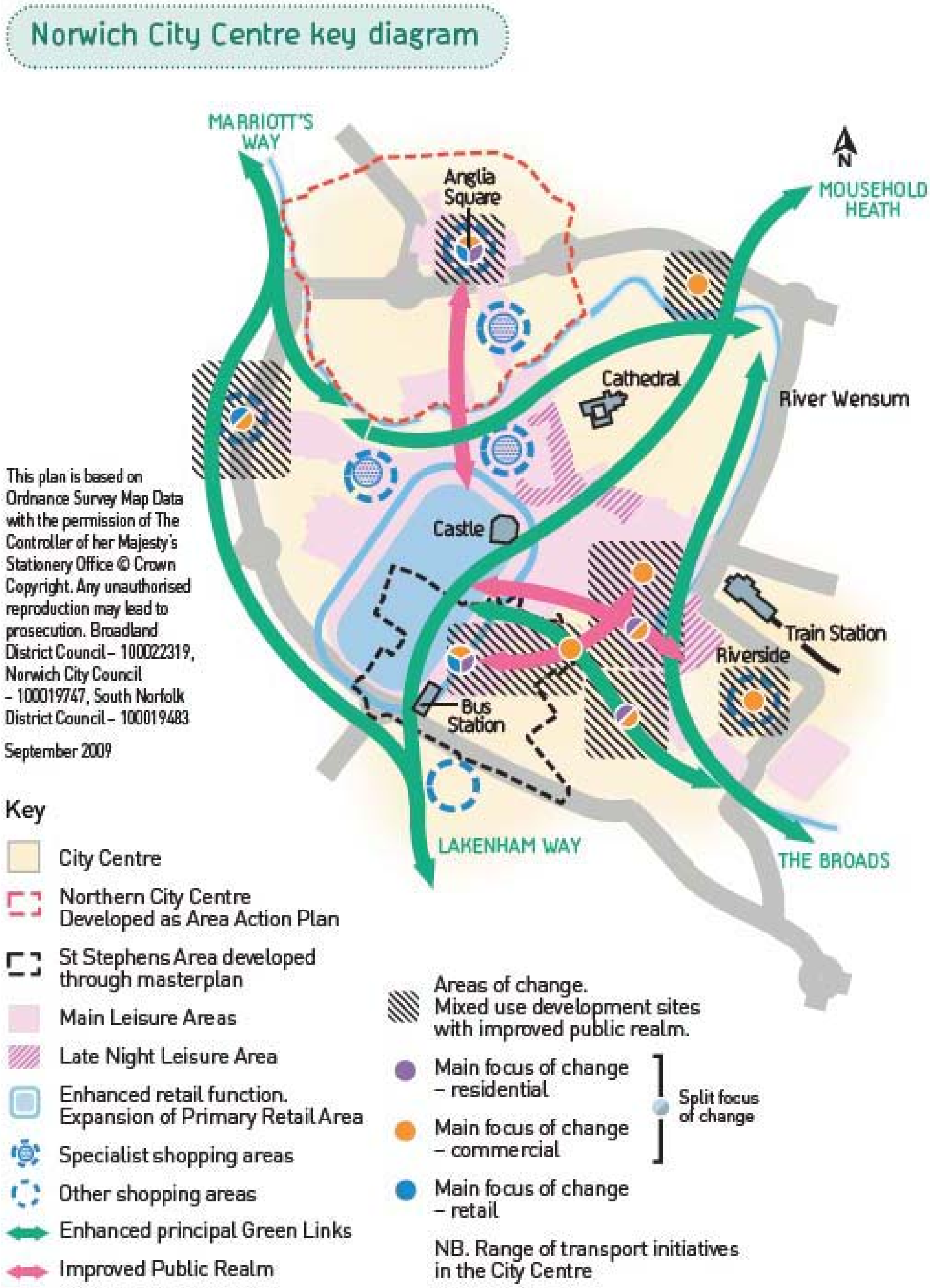
The regional centre role will be enhanced through an integrated approach to economic, social, physical and cultural regeneration to enable greater use of the city centre, including redevelopment of brownfield sites. It will be the main focus in the sub-region for retail, leisure and office development. Housing and educational development will also reinforce the vibrancy of the city centre. Its role will be promoted by:

• enhancing the historic city, including its built, archaeological and environmental assets and its distinctive character as identified in Conservation Area appraisals, through innovative, sustainable design
• strengthening the city’s role as a cultural centre and visitor destination of international importance, with additional tourist facilities, including promotion of conference and concert facilities
• expanding the use of the city centre to all, in particular the early evening economy and extending leisure and hospitality uses across the city centre, with late night activities focussed in identified areas
• enhancing its retail function, providing for a substantial expansion of comparison retail floorspace of varied types and size of unit to provide a range of premises. This will be achieved through intensification of uses in the primary retail area and if necessary through its expansion; other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets
• expanding its function as an employment centre, including provision of high quality office premises and a diversity of uses across the area, including media, creative,
financial, business and professional services and information communication industries Housing development densities will generally be high, but family housing will also be
provided to achieve a social mix. Housing will be provided as part of mixed use developments wherever possible.

To support these roles, improvements will be made to:

• the public realm
• open spaces, green linkages and connections between open spaces, linking to the river
corridor and the open countryside
• walking and cycling provision
• sustainable transport access to and within the city centre in accordance with the Norwich Area Transportation Strategy, in particular to strengthen its role as a gateway and hub of an enhanced public transport system
Areas of the city centre will be comprehensively regenerated:
• the Northern City Centre will be developed in accordance with its Area Action Plan to achieve physical and social regeneration, facilitate public

transport corridor
enhancements, and utilise significant redevelopment opportunities
• the St Stephens area will be developed for mixed uses in accordance with its masterplan, to promote retailing, offices and housing and to create an improved pedestrian environment
• the Rose Lane area will be a major focus for commercial development



Policy 19: The hierarchy of centres

The development of new retailing, services, offices and other town centre uses as defined by government guidance will be encouraged at a scale appropriate to the form and functions
of the following hierarchy of defined centres:

1. Norwich City Centre

2. The town and large district centres of: Aylsham, Diss, Harleston and Wymondham, and within the Norwich urban area, at Anglia Square/Magdalen Street and Riverside

3. The large village and district centres of: Acle, Coltishall, Hethersett, Hingham, Loddon, Long Stratton, Poringland and Reepham, and within the Norwich urban area at Aylsham Road, Drayton Road, Bowthorpe, Dereham Road, Eaton Centre, Earlham House, Larkman centre, Plumstead Road, Old Catton and Dussindale (Thorpe St Andrew). New district centres/high streets to be established within the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, at Blue Boar Lane, Sprowston and Hall Road, Norwich. The Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle will be served by a district centre. This may be provided by building on the proposed district centre at Blue Boar Lane or the creation of a second district centre elsewhere in the Triangle as determined through the Area Action Plan for the Growth Triangle.

4. Local centres, including new and enhanced local centres serving major growth locations in the Norwich Policy Area.

Policies will be introduced in DPDs for all categories of centre as well as more dispersed services in villages to enhance the environment and economy of the centre or village and to protect its function by controlling proposals which would result in the loss of commercial premises or local services.

Appendix 2 Summary of findings of The Retail and Town Centres Study

The study finds that.

- Non-food retail expenditure is estimated to increase by 45% to 2016 and by 80% by 2021. This equates to the need for additional comparison goods floorspace of 14,125 sq.m. (net) by 2011 and 43,352 sq.m. by 2016 *and x by 2026* (for comparison, Chapelfield is 30,000 sq.m.)

- Total available convenience goods expenditure is projected to grow by 12% over the period to 2016 and by 19% to 2021. City centre stores in particular are trading well – principally Morrisons at Riverside and Sainsbury's at Brazen Gate, are over-trading (measured against national averages for specific stores. There is no forecast capacity for new stores in Broadland or South Norfolk, with the majority of need being met at through allocated sites Anglia Square and Hall Road.

- Norwich City Centre is unlikely to lose significant market share from its catchment, though it needs investment to maintain its position as other centres such as Ipswich, Cambridge, Bury St Edmunds and Kings Lynn are improving their retail offer. This investment should include the historic environment and tourist attractions of the centre and its specialist retail areas identified in the JCS, as these contribute to Norwich's unique identity and character.

- The more rundown areas of the city centre should be priorities for investment: St Stephens Street in particular would benefit from a reduction in pedestrian vehicle conflict and, along with Westlegate and Ber Street/ Rouen Road, are suitable site for new comparison goods floorspace which would integrate other recent developments more fully into the retail centre. Investment in the centre can also assist in improving linkages and integration between Chapelfield and Riverside and the rest of the centre.

- Anglia Square represents the most suitable, viable and available sequential opportunity to meet the identified need for new convenience floorspace in the city centre. It partly a specialist secondary retail area to the city centre, but is in need of investment and refurbishment. This centre has excellent accessibility and is designated for significant redevelopment in the North City Centre Area Action Plan. A strong new anchor foodstore would provide a key attractor to help regenerate the centre.

- The existing retail warehouse parks in the Norwich area meet the need for this kind of floorspace and the study does not suggest there is need for any additional out-of-centre retailing.

- The trend by which larger stores (especially foodstores) evolve into multi-department stores is recognised as a potential threat to some smaller centres/ shops, where larger out-of-town stores become the destination for all shopping trips. Where smaller centres have been unable to diversify their offer, they have often suffered from this trend.

- There should be a focus on making the city centre feel safer; the council should identify evening leisure quarters that cater for different age groups.

- Norwich has a good range of bars, restaurants, cafés and night clubs located throughout the centre. This is further reinforced by Riverside, although survey work finds that this functions primarily as a car-based destination and there are limited numbers of linked trips to the rest of the city centre.

- Norwich city centre has a good provision of leisure and cultural facilities – cinemas, bingo, ten-pin bowling, bars, restaurants and health and fitness clubs and museums and theatres serving the whole sub-region. Whilst there is adequate provision in the centre, there may be opportunities for innovative leisure development to build on the existing offer.

- In terms of restaurants, bars and clubs, Norwich has a very strong draw across the whole area, both in the daytime and the evening. The study suggests that a broad level of provision amounting to a minimum 15% of town centre floorspace comprises cafes restaurants and bars and this proportion is a good guide to future needs for provision within new development schemes.

- Overall the study proposes that leisure growth in the study area could amount to some 23% by 2016 and that this should be located primarily where it will assist in maintaining the vitality and viability of the city centre.

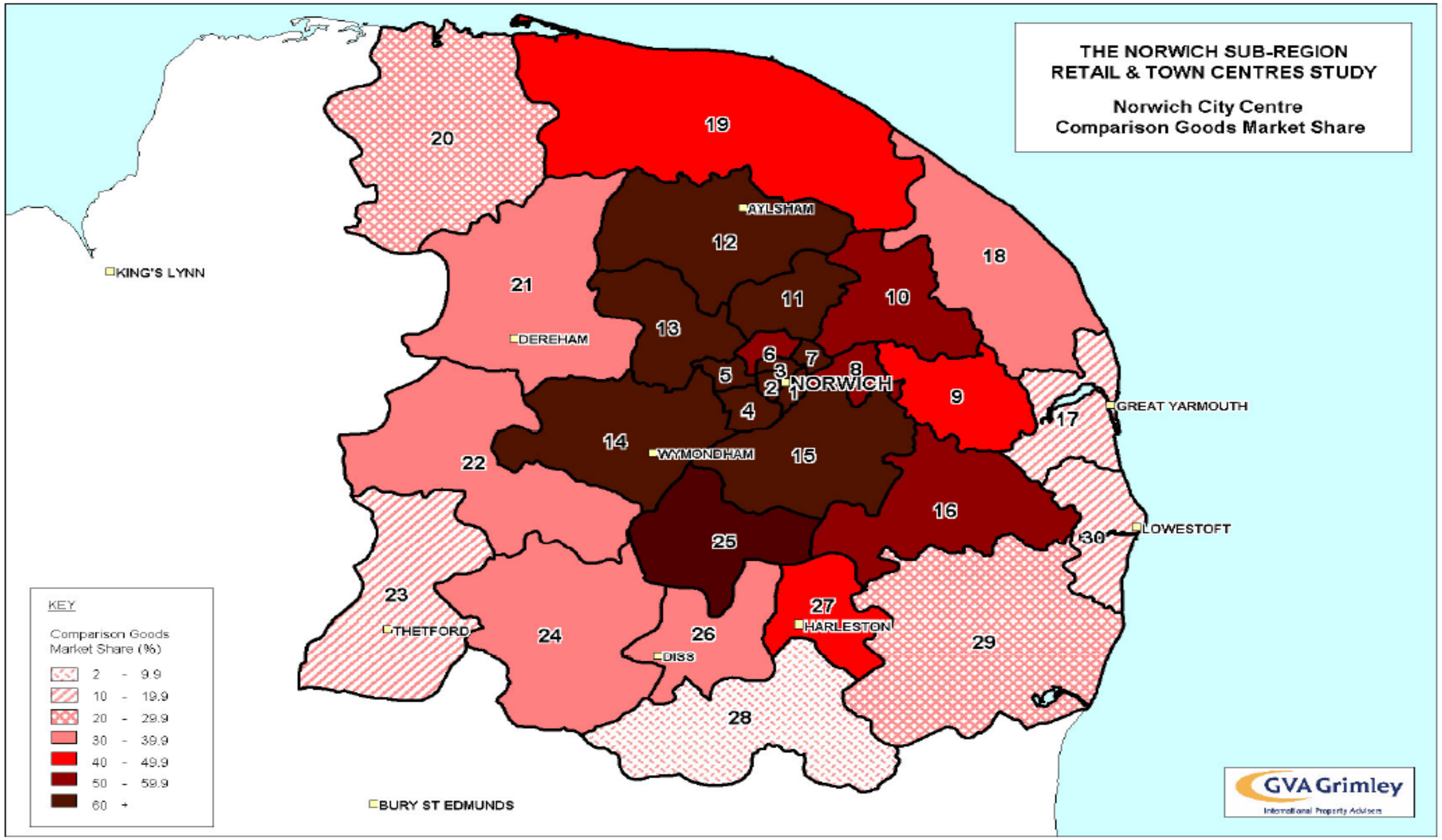
- For cinema screens, Norwich has considerably more – at 26 – than would be expected by the area's population. This means that there is no quantifiable need for new cinemas up to the year 2016.

- Of the existing district centres most provide vital and viable retail services, with few vacant shops in most of them. The anchor foodstores vary in size, but each centre provides for such purchases mainly on a top-up basis. Some district centres would benefit from provision of financial services such as banks – e.g. Distillery Square, Drayton Road and the Larkman. Other centres could be improved by provision such as community centres, health centres, libraries and job centres. The maintenance of short-term parking opportunities is vital to each of these district centres and this aspect could be improved at Plumstead Road, the Larkman and Drayton Road. Also pedestrian crossings provide an important link to residential areas – especially at Aylsham Road and Drayton Road where foodstores are separated from other parts of the centre by a road. Several of the district centres would benefit from improvements to the public realm.

- The study’s assumptions and trends should be continuously monitored and tested

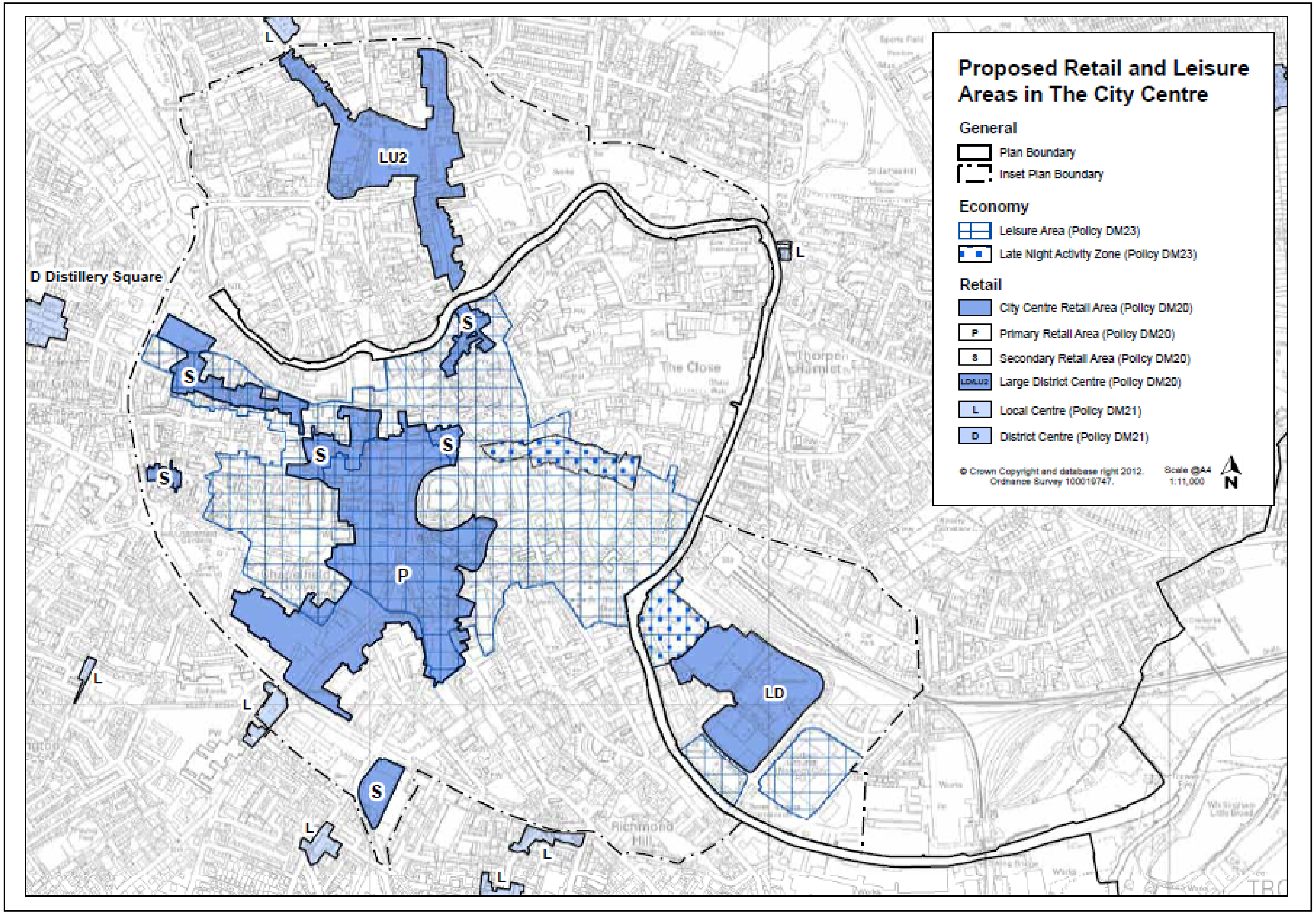
Appendix 3 Maps

Map 1 Norwich City Centre Comparison Goods Market Share and "Shopping hinterland"

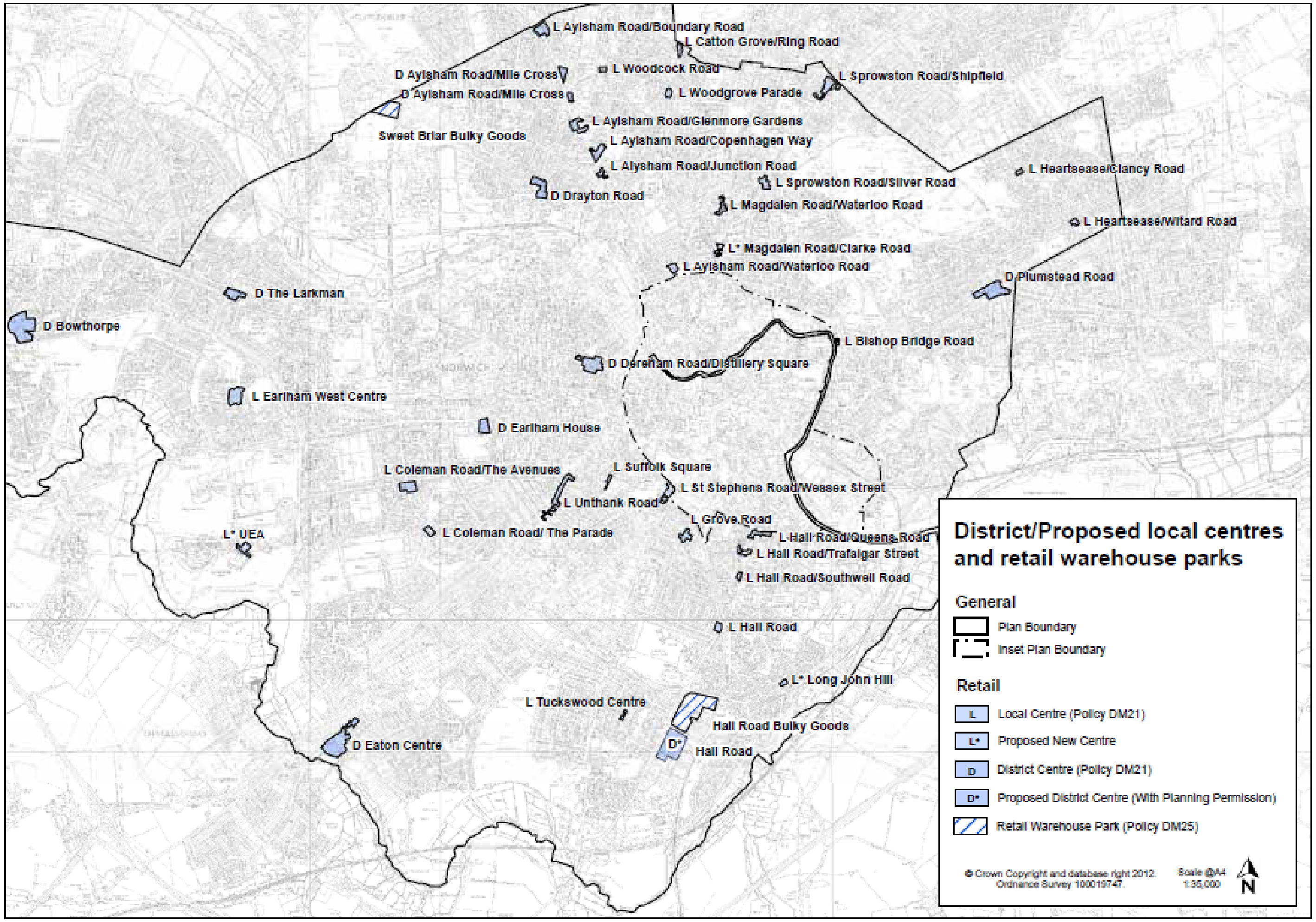


Map reproduced from GBPro 200 GB (2005 edition). © Colins Bartholomew Ltd (2005). Postcode Boundary Data: © 2005 Royal Mail

Map 2 Proposed City Centre Retail and Leisure Areas



Map 3 District and Local Centres and retail warehouse parks



Appendix 4 Existing Local Plan policies, associated issues and emerging policy

Issues		LP policy summary	Issues arising since adoption	Policy response
Need and capacity for retail development	**Comparison Goods**	**Policy SHO1**: Restricts major new shopping development to committed and allocated retail development sites unless an overriding need and capacity can be demonstrated	Generally very successful with substantial increase in city centre retail floorspace and rise in league tables Slight decrease in city centre floorspace in last 2 years due to recession and need to diversify city centre Protection of functions in specialist areas e.g Elm Hill and potential to improve tourism offer	JCS policy 11: sets comparison goods targets, the great majority of which is to be provided for in the city centre through intensification of uses eg St Stephens or expansion eg Barn Road Car park encourages café and restaurant development throughout centre to enhance vitality and attractiveness and promote tourism identifies “specialist” shopping areas in city centre (Norwich Lanes, Elm Hill and Magdalen Street) – need for more detailed DM policy to support this?
	Convenience Goods	**Policy SHO2**: Accepts new convenience goods retailing up to a limit of 1200 square metres net, subject to the locational considerations in Policy SHO3	Relatively limited convenience retail offer in city centre not fully addressed, though permitted expansion of Sainsbury has provided some additional convenience floorspace and	Area Action Plan promotes redevelopment of Anglia Square (including anchor food store) to ensure centre better meets needs

			additional conveineec stores have been developed around city centre. Planning permission granted, though not implemented for foodstore at Anglia Square	
Location of development	**Retail Hierarchy**	**Policy SHO3** Retail development to be located and scaled according to the retail hierarchy of centres and the sequential approach to site selection (with the City centre given first priority)	Function of: Riverside Anglia Square	Hierarchy in JCS policy 19 changes Riverside to Large District Centre to retain strong primary retail area Area Action Plan promotes redevelopment (including anchor food store) to ensure centre better meets needs
City centre	**Site allocations**	**Policies SHO4, SHO5** and **SHO6**: Site allocations for new retail development in the City Centre, at King Street, Anglia Square and Westlegate/Timberhill.	Each of these has since been the subject of a planning application, but none is yet developed	Site allocations retained in AAP and Site allocations plans
	Small scale retail extensions	**Policy SHO7**: Accepts retail extensions in or on the edge of the City centre up to an indicative threshold of 500 sq.m		JCS policy 11 allows for retail expansion within and extensions to centres
	Enhancement of Shopping	**Policy SHO8**: Requires retail developments of 1000 sq.m and over to contribute to the enhancement of the Norwich Shopmobility scheme		JCS policy 11 enables funding to be provided for furthr Shopmobility schemes if needed

	Environment	**Policy SHO9**: Requires retail developments to contribute to the overall enhancement of public areas of the centre, to include seating, cycle/pedestrian improvements, street design and (in case of developments over 1000 sq.m) other appropriate off-site facilities	Has brought in financial contributions which have been used to match fund other external funding sources. Recent environmental improvements include those to Norwich Lanes, St Stephens and St Georges Street	CIL payments (required through JCS policy 20 emerging CIL schedule) and funding from Norfolk County Council required as part of recent national funding for NDR will provide for further environmental improvements to city centre as part of development of Bus Rapid Transit system (required by JCS policies 6 and 9)
	Change of use in primary area	**Policy SHO10**: Sets out criteria for the acceptance of non-retail uses in primary shopping frontages (specifying a minimum of 85% retail use in defined frontage zones at ground floor level). Allows exceptions in the case of A3 uses where a beneficial effect on vitality and viability can be demonstrated		JCS policy 11 and DM 20 continue this approach
	Change of use in secondary area and Large District Centre	**Policy SHO11** Sets out criteria for the acceptance of non-retail uses in secondary shopping frontages and the Large District Centre (specifying a minimum of between 40% and 70% retail use in defined retail areas at ground floor level, depending on location). The Plan Proposals Map defines specific frontages where non-retail uses are acceptable and no		JCS policy 11 and DM 20 continue this approach

		minimum retail threshold applies.		
District and Local Centres	**Development in centres**	**SHO12** Supports sustainably accessible appropriate scale retail development in or adjacent to centres	Extensive development of small supermarkets in or on the edge of district centres and large convenience stores in local centres leading to lower vacancy rates in those centres experiencing such development in comparison with those which have not	JCS policy 12 and DM 21 continue this approach
	Site Allocation	**SHO13** Allocates former Bally Shoes site at Hall Road for new district centre to serve south Norwich	Planning Permission granted for development of district centre larger than envisaged in Local Plan.	Retained in Site allocation plan (though extended in comparison with LP allocation?)
	Environmental enhancements	**SHO14** Requires new developments to contribute to improvements to safety and attractiveness of centres	Some developments have provided enhancements e.g. Plumstead Road though retail study suggests further improvements needed in	JCS policy 11 and DM 20 continue this approach
	Changes of use	**SHO15** Sets out criteria for the acceptance of non-retail uses centres (specifying a minimum of 60% retail use). Allows exceptions in the case of	Need to promote diversity of centres, including community facilities remains	

		underrepresented or community uses		
Small scale retail development outside centres	**In Residential areas**	**SHO16** Allows for small scale shop development (max. 100 square metres) in residential areas in accessible locations	Emerging issue of change of use to convenience stores outside local centres (no controls from other "A" class uses e.g. former pubs – except through an Article 4 direction)	DM18 enables small scale retail development outside centres
	In Petrol Stations	**SHO17** Allows for small scale convenience shop development (max. 200 square metres) in petrol stations	Congestion has resulted from development of convenience stores at petrol station e.g. Earlham Fiveways	Less permissive policy through DM18
Retail Warehouses	**Bulky Goods**	**SHO18** Restricts changes of use or subdivision of bulky goods units on retail warehouse parks to other retail or employment uses	Pressure for conversion to comparison goods sales, but some convenience goods	JCS policy 19 and DM 25 continue this approach
Markets	**Norwich Provision Market**	**SHO19** Supports retention and enhancement of market		JCS policy 11 and DM 20 continue this approach
	Other small scale markets	**SHO20** Supports small scale and farmers markets, while restricting of additional Sunday and large markets JCS?		
Food and Drink	**Pubs**	**SHO21** Criteria for redevelopment of historic and "community" pubs	Some loss of pubs to other uses, particularly larger pubs with gardens in residential areas	Similar approach taken through DM22 Late night activity zone

			Need to retain late night uses in defined areas	retained, with boundaries amended as appropriate, but evening activities “café culture” promoted throughout centre
	Takeaways	**SHO22** criteria for new takeaways restricting them to retail and leisure areas and covering environmental, amenity and highway issues	Some increase in number of takeaways	Similar approach taken through DM24