

Report for Discussion

Report to Sustainable Development Panel
19 October 2011

Item

6

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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Background Documents

None

Report

Background

1. It was agreed at the Sustainable Development Panel meeting on 28 September that a further update of evidence would be reported to the October and November panel meetings. The aim is to provide members with a greater understanding of the background to, and justification for, a number of key policy areas in the emerging Site allocations and Development management policies plans.

Updated evidence base

2. This report includes draft topic papers for the following policy areas.
 - Housing (see appendix 1): this topic paper provides background for housing related policies in the DM policies plan, and for the housing allocations proposed in the Site Allocations plan; and explains the requirement in the Joint Core Strategy to allocate 3000 dwellings in Norwich to 2026.
 - Employment (see appendix 2): this topic paper includes employment-related evidence previously reported to members at the panel meeting on 28 September, and additional evidence in relation to defined employment areas, protection of small and medium scale business sites and premises, and protection of offices.
 - Open space, sport and recreation (see appendix 3): this topic paper provides evidence on the provision of open space and indoor facilities.

Next steps

3. Evidence on several additional policy areas - retail and town centre issues, and transport - will be reported to the next Sustainable Development Panel meeting on 30 November.
4. Production of evidence to support plan development is an iterative process. These topic papers, and others currently being developed, will assist members in their consideration of the next draft of the Development Management Policies and Site Allocations plans. Prior to submission of the plans and supporting documentation to the Secretary of State, probably late in 2012, the topic papers will need to be updated to take account of changes to policies in response to representations made at the second stage of Regulation 25 consultation (yet to be reported to members), the National Planning Policy Framework once revised, updated monitoring information, and the final sustainability appraisal reports for both plans.
5. These further updates will be reported to members in due course.

Housing 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). 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 early - mid 2012, and will be submitted to the Secretary of State for public examination later in 2012. 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 housing topic paper provides information about the way that housing policies in the Development Management DPD and housing allocations in the Site Allocations DPD have been developed, and how they respond to national planning guidance and the emerging National Planning Policy Framework.

2. Context

Population

2.1 The latest population estimate for the city of Norwich at mid 2010 is 143,500¹, which is an increase of almost 19% from the 2001 Census figure of around 121,000. Norwich, along with Broadland and South Norfolk districts, is forecast to have a high rate of population growth over the next 15 years: the city's population is projected to grow by 13% to 2026, an additional 16,800 people².

2.2 The city's age structure is forecast to change over the next 15 years. Norfolk's population is predicted to get older overall, in line with national trends, although this is less marked for Norwich than for the remainder of Norfolk. Norwich's age structure at 2026 is predicted to be 35.5% in the 0 - 24 age range, 47.5% for the 25 - 65 age range (in both these categories, Norwich has the highest percentage for any Norfolk district), and 17.1% for the 65+ age range (the lowest out of the Norfolk districts)³. At present the percentage of Norwich's population aged 65 and above is only 13.73%⁴.

Housing stock

2.3 The city's current housing stock is 63,700 dwellings based on Council Tax data. Current housing tenure data shows that over half the housing stock (51%) is owner-occupied and a quarter (25%) is council housing,

¹ Office of National Statistics: mid year estimates, 2010.

² Norfolk County Council 'Place and People', April 2011.

³ Norfolk County Council: 2006-based dwelling-led population projections.

⁴ Office of National Statistics: mid year estimates, 2010.

with 16% privately rented, and 9% owned by housing associations⁵. Household size has been falling over recent decades. The average household size for Norwich was 2.15 in the 2001 Census.

2.4 Norwich has the highest proportions of terraced dwellings (36%), and flats (31%), compared with Broadland and South Norfolk Districts. Flats and terraced dwellings tend to have fewer bedrooms, so Norwich also has the highest proportions of one-bedroom (15%) and two-bedroom (30%) dwellings⁶ compared to the other districts.

2.5 The City Council monitors trends and changes in the housing stock. See Table 3 on page 8 which sets out completions of dwellings over the past decade: completions have averaged 679 over the last 10 years, reaching a high of 1040 in 2007/08, and dropping off significantly since then. The average affordable housing provision has been 31%⁷ of total completions from 2004 to 2011.

HCA partnership

2.6 The Norwich and HCA Strategic Partnership was formed in September 2009 following signing of a Collaboration and Investment Agreement between Norwich City Council and the Homes and Communities Agency (HCA). The Partnership is based on investment from HCA and City Council assets and is intended to create a self-perpetuating finance arrangement through the reinvestment of the proceeds from development in future projects which meet the Partnership's objectives. The objectives are:

- To accelerate the delivery of affordable homes
- To increase the supply of private homes
- To improve the quality of existing homes
- To maximise the opportunities for local employment
- To deliver early outputs
- To create sustainable communities
- To deliver strategic regeneration projects within Norwich such as eco-retrofit programme or estate renewal.

2.7 In total the Partnership provides for £8M investment from HCA of which £7.5M has already been paid to the City Council (the final £500K will come from additional receipts from the sale of sites for affordable housing). The Collaboration and Investment Agreement included an initial business plan for the Partnership and set out the way that the investment should be used, which includes the following:

- £1.745M for the eco-retrofit of 800 Council homes (now completed)

⁵ Norwich City Council Area Key Statistics (June 2011)

⁶ Greater Norwich Housing Market Assessment Report (GNMP, 2007)

⁷ Norwich City Council Housing land availability surveys 2004-2011

- £2.5M to help to bring forward the Threescore site at Bowthorpe for development (a development partner has now been procured for the first phase of development)
- Further affordable housing grant to be provided to allow for 100 homes on small sites to be started by 31 March 2011 (currently being delivered).

Housing policy context

2.8 The current national planning policy relating to housing is set out in 'Planning Policy Statement (PPS) 3 – Housing', published in 2006. Key elements of the guidance include the requirement that planning authorities look at least 15 years ahead from forecast date of adoption, and an increased emphasis on delivery, the re-use of brownfield land, and on making efficient use of land for development. In forecasting the future supply of housing, PPS3 states that planning authorities should not make any allowances for windfall development beyond the current stock of planning permissions.

2.9 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 Bill (which includes the abolition of Regional Spatial Strategies), proposed amendments to the changes of use within the planning system, and consultation on Planning for Travellers.

2.10 The NPPF is strongly pro-development, and creates a presumption in favour of sustainable development. It places great emphasis on the promotion of sustainable economic development through the planning system. Local planning authorities are required to prepare Local Plans on the basis that objectively assessed development needs should be met, with sufficient flexibility to respond to rapid shifts in demand or other economic changes. One of the implications of the NPPF is that local plans will need to re-incorporate policy content from PPSs, and will need to be written more explicitly, especially where the Joint Core Strategy does not include sufficient guidance. Any amended policy content will have to be justified by evidence.

2.11 The draft NPPF's objectives in relation to housing are to:

- increase the supply of housing
- deliver a wide choice of high quality homes that people want and need
- widen opportunities for home ownership; and
- create sustainable, inclusive and mixed communities, including through the regeneration and renewal of areas of poor housing.

- 2.12 The requirement to identify and maintain a rolling five year supply of deliverable housing sites and a longer-term supply of developable sites is retained from PPS3, as are its key tools and mechanisms to assess the local need for market and affordable housing and to calculate the sufficiency of the housing supply and delivery over time. Strategic Housing Land Availability Assessments (SHLAAs); Strategic Housing Market Assessments (SHMAs) and Housing Trajectories within monitoring reports will continue to be a key part of the local planning authority evidence base. As in PPS3 the NPPF emphasises that the housing supply should come in the main from identifiable sites in the short and medium term and identified broad locations in the longer term. Windfall sites should not be allowed for in the first ten years of housing supply unless there is compelling evidence to show that specific sites cannot be identified. A new requirement of the NPPF is that the housing supply should seek to identify an additional allowance of at least 20 percent “to ensure choice and competition in the market for land”.
- 2.13 National minimum density standards for housing development do not appear in the NPPF: instead LPAs are advised to *“set out their own approach to housing density to reflect local circumstances”*. The re-use for residential purposes of empty housing and other buildings is strongly supported (making use of Empty Homes Strategies to identify opportunities and using CPO powers to acquire property where necessary).
- 2.14 The delivery of a wide choice of quality homes requires local planning authorities to *plan for a mix of housing based on current and future demographic trends, market trends* and the needs of different groups in the community. Local planning authorities should *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand*. In relation to affordable housing they should *set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified”*.
- 2.15 The NPPF is unlikely to be published in its final form until early 2012. It may be necessary to update and revise this document in the light of the content of the revised NPPF.
- 2.16 The East of England Plan (May 2008) is the adopted Regional Spatial Strategy for the East of England, however it is due to be abolished by the Localism Bill once this is enacted. The EEP specifies the number of new homes and jobs to be provided in the area to 2021. It identifies Norwich as a main focus for growth in the East of England for new homes, jobs, leisure, cultural and educational development, and sets the context for the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) in relation to a number of key areas including housing provision, affordable housing, and provision for gypsies and travellers.

2.17 The JCS was developed by the Greater Norwich Development Partnership (GNDP), a partnership of the three councils of Broadland, Norwich and South Norfolk, working together with Norfolk County Council. The JCS was adopted in March 2011 and sets out a strategy for growth of the Norwich policy area. Objective 2 of the plan is 'to allocate enough land for housing, and affordable housing, in the most sustainable settlements'. This translates into a requirement to deliver 37,000 more homes in the Norwich policy area to 2026 (in JCS policy 4 'Housing delivery'). The housing requirement is set out in more detail in section 3 below.

2.18 Policy 4 in the JCS also requires proposals for housing to contribute to the mix of housing required to provide balanced communities and meet local needs, addresses the need for affordable housing, housing with care, and provision for gypsies and travellers.

2.19 The evidence base to support JCS's policies is set out in that document at Appendix 2. In terms of housing evidence, this includes the following documents which also form part of the housing evidence base for the DM Policies and Site Allocations DPDs:

- Greater Norwich Housing Market Assessment (GNDP, 2007)
- Greater Norwich Housing Market Assessment update (Greater Norwich Development Partnership (GNDP), Nov 2009)
- Norwich City Council Affordable Housing Viability Testing (NCC, June 2009)
- Strategic Housing Land Availability Assessment (SHLAA) (Nathaniel Litchfield and Partners, 2009)
- Greater Norwich Sub-region Evidence base for a Housing market Assessment: a Study of Housing Need and Stock Condition (GNDP, 2006).
- Planning Policy Statement 3 (PPS3) Housing
- East of England Plan Policies H1-H3
- Greater Norwich Housing Strategy 2008-2011
- East of England Forecasting Model Spring 2010

3. Housing requirement

3.1 The JCS identifies the Norwich policy area (defined as the Norwich urban area and the first ring of fringe villages) as the focus for major growth and development over the lifetime of the plan, with a requirement to deliver 21,000 new dwellings from 2008 until 2026. In the city of Norwich area alone, JCS policy 9 requires at least 3000 new dwellings to be delivered over the plan period to accommodate this level of growth. The majority of JCS growth for the Norwich Policy area to 2026 however will be delivered in Broadland District (9,000 dwellings) and South Norfolk District (9,000 dwellings).

- 3.2 The figure of 3000 new dwellings for Norwich is in addition to the existing commitments, including previous Local Plan allocations and undeveloped permissions, of 5,592 dwellings as at 31st March 2008 (the base-date of both the JCS and Site allocations plan). This provides the context for the level of allocations to be delivered through the Site Allocations plan. JCS policy 11 deals specifically with Norwich City Centre and proposes housing growth 'to meet need and to further promote a vital and vibrant city centre community'. Taking account of committed development and new allocations, a minimum of 2,750 dwellings is required in the city centre between 2008 and 2026.
- 3.3 A housing topic paper was produced to support the housing policies of the JCS⁸, and includes evidence to support the housing requirement to 2026. It explains that the calculation of the amount of housing for which land needs to be allocated is based on housing monitoring information from the three districts regarding the number of housing already built or committed at 31st March 2008.
- 3.4 The JCS topic paper also explains the importance of the Strategic Housing Land Availability Assessment (SHLAA) in demonstrating that there is sufficient deliverable and developable land available to meet housing requirements in the Norwich Policy Area, and in particular in demonstrating the realistic capacity of Norwich to accommodate housing and thus minimise the need for greenfield development outside the city.

4. Housing land availability

Basis of the housing provision and land supply

- 4.1 The SHLAA is a key piece of supporting evidence guiding the development of Norwich's Site Allocations DPD.
- 4.2 The SHLAA study commenced in 2008 and was completed in July 2009. The study started with a call for sites exercise to establish the potential development sites in Broadland, Norwich and South Norfolk. Nathaniel Lichfield & Partners was appointed to undertake the 'stage 7' study which assessed suitability, availability and achievability of the identified sites for residential development in order to arrive at conclusions on deliverability and developability. The study concluded that for Norwich, there is a potential to deliver 9,153⁹ dwellings from 2009 to 2026.
- 4.3 To put this in context, the total housing requirement for Norwich to 2026, as set out in the JCS, is 8,592 dwellings. This figure is correct at the base date of the JCS (31st March 2008) and is made up as follows:

⁸ Joint Core Strategy Housing Topic Paper (GNDP, November 2009).

⁹ Including existing commitments

Current commitment (planning permissions and Local Plan allocations) at 2008	5,592
New allocations to 2026	3,000
Overall dwelling requirement to 2026	8,592

Table 1: JCS housing requirement for Norwich to 2026

(Source: extracted from JCS paragraph 5.25)

- 4.4 This would imply that there is sufficient capacity in Norwich, identified through the SHLAA, to satisfy the JCS requirement to 2026.
- 4.5 The 'current commitment' figure for Norwich has recently been updated to 1st April 2011, and now stands at 5,269 dwellings. The difference between the two commitment figures is due to housing completions and expired permissions over the last 3 years since the base date of the JCS. The revised figure is made up as follows:

Current valid permissions at 2011	2,748
Undeveloped Local plan and Northern City Centre AAP allocations at 2011	2,421
Revised commitment to 2026	5,169

Table 2: Norwich housing provision to 2026 at 1-04-11

(Source: Norwich City Council Housing land availability survey 2011)

Housing completions

- 4.6 The level of housing completions has fallen since 2008, due to the economic downturn. It is difficult to predict the exact pattern of housing delivery over the next few years as the situation of development industry is still volatile. However, it is anticipated when the economy picks up, the overall housing delivery will also improve.

Housing completions 2001-2011

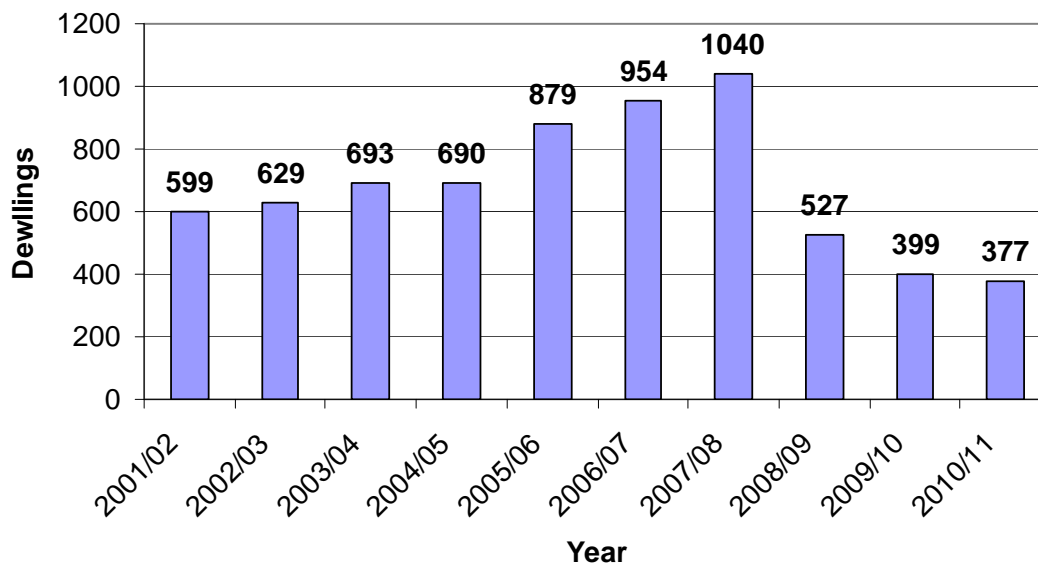


Table 3: Housing completions 2001-2011

(Source: Norwich Housing Land Availability Surveys 2001-2011)

- 4.7 As an urban area, Norwich has a high level of windfall development, averaging 35% of total dwelling completions over the last ten years. Although there are inevitably fluctuations in the level of windfall development, the overall level is expected to continue to make a significant contribution towards achieving the overall housing requirement set out in the JCS.

Density assumption

- 4.8 The methodology for arriving at site allocations to meet the housing requirement figure in the JCS is set out in detail in section 5 below. Relevant to this is the issue of the assumptions used about density of development on housing sites in the city.
- 4.9 Policy DM12 requires that all development should achieve at least 40 dwellings per hectare unless there are exceptional circumstances which justify a lower density. This is due to the fact that Norwich is predominantly an urban area with existing higher density development. Also the current policy PPS requires development to make efficient use of land and to avoid development on greenfield sites. Data from the yearly Housing land availability surveys, set out in the following table, shows that the average density of completed dwellings in the Norwich urban area is consistently high, with more than 90% of completions being on sites achieving over 40 dwellings per hectare during the past few years. This supports the minimum density requirement of 40 dwellings per hectare in DM12.

Year	Average density	Joint Core Strategy requirement (% of total dwellings completed)			Previous Local Plan requirement
		<30 dph	30-50 dph	>50 dph	>40 dph
2004/05	-	4	33	63	-
2005/06	-	2.1	35.9	62	-
2006/07	-	2.2	25.2	72.5	-
2007/08	88	0.38	17.21	82.4	90.4
2008/09	102	1.9	18.5	79.6	90
2009/10	83	2.7	16.7	80.4	90
2010/11	98	0.58	16.3	83.1	90.1

Table 4: Average housing densities for Norwich, 2004-2011

(Source: Annual monitoring reports and Housing land availability surveys)

- 4.10 The density assumptions in the Site allocations plan are based on the approach developed in the Strategic Housing Land Availability assessment. This is based on 100 dwellings per hectare for the city centre area and 50 dwellings per hectare for the rest of the city. Where a mixed use development is proposed, the density is calculated on the assumption of 80% of the total site capacity being used for housing. This approach was used as a starting point for the housing density calculation. The densities of the individual sites were then updated based on the subsequent assessments and site visits reflecting the practical situations based on the constraints and opportunities identified.
- 4.11 The previous evidence from the Housing land availability surveys shows that most city centre housing development achieves a density of more than 100 dwellings per hectare. Table 4 shows the average density is around 90 dwellings per hectare even for the city as a whole. This data supports the density assumptions used in the Site Allocations plan.

Housing trajectory

- 4.12 The most up-to-date housing trajectory for Norwich is for 2009/10 (it will be updated to 2010/11 in the next Annual Monitoring Report (AMR) to be published in late 2011). The following information is based on the 2009/10 data.
- 4.13 The projection in 2010 predicted that the 2011 completions would continue to be low in year 2010/11 at 326 dwellings. The actual completion however identified a completion of 377 dwellings which shows a slightly positive trend towards housing delivery. A total of 6,787 net additional dwellings has been completed in Norwich from 2001 to 2011.

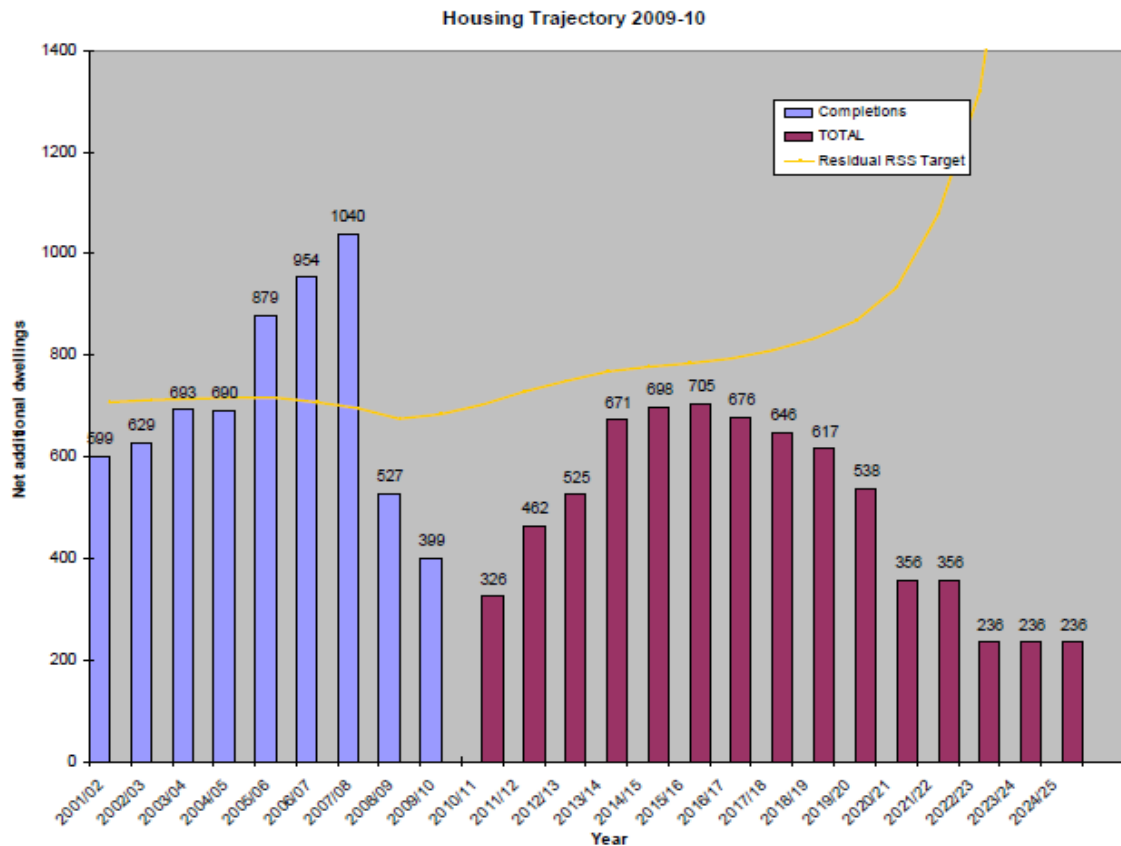


Table 5: Housing trajectory 2—9/10

(Source: Norwich City Council Annual Monitoring Report 2009/10)

5. Housing need and demand

Housing mix (tenure and size)

- 5.2 The JCS requires housing development to contribute to the mix of housing requirement to provide balanced communities and meet the needs of the areas, as set out in the most up to date study of housing need and/or Housing Market Assessment. The long term housing mix is difficult to predict, however the evidence base for the housing market assessment looks at housing requirements for the period 2006-2011. This indicates the suggested breakdown of housing mix:

	% of net requirement
Market housing	44.5
Upper & Middle Intermediate Bands (shared equity/ownership housing)	2.1
Lower Intermediate Band & Social (Social rented housing)	53.4

Table 6: Summary of 5-year housing requirement by housing type (Norwich)

(Source: Evidence base for a housing market assessment; a study of housing need and stock condition)

- 5.3 The mix of market housing size is largely left to the market. However it is currently influenced by the factors below. These are informed by market intelligence and short term government policy:
- It is likely that demand for family housing will be relatively higher than other types of housing in the short term due to mortgages being mostly available for a particular type of buyer in need of family housing. However, a balance should be struck between market conditions and efficient use of land.
 - New housing benefits reform might also trigger a need for smaller properties and housing in multiple occupation as housing benefit claims will be linked to the size of property a claimant lives in.

Housing need: affordable housing

- 5.4 The affordable housing requirement is set out in the JCS Policy 4 which requires that affordable housing will be sought on all sites for 5 or more dwellings (or 0.2 hectares or more).
- 5.5 The JCS states that the proportion of affordable housing, and the mix of tenure sought, will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is:
- On sites for 5-9 dwellings (or 0.2 – 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
 - On sites for 10-15 dwellings (or 0.4 – 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
 - On sites for 16 dwellings or more (or over 0.6 ha) 33% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5)

Housing need: residential institutions and lifetime homes

Institutional housing

- 5.6 Joint Core Strategy policies 4 and 7 set out the need of housing with care in the Greater Norwich Area and some other major locations. Housing with care schemes are included in a number of site proposals in the site allocations plan. However this document does not intend to address the shortfall of this type of development. This issue is however largely dealt with in the DM policies plan (Policy DM13) by setting out criteria for institutional residential development and will be informed by the most up to date evidence of needs.
- 5.7 The table below provides a snapshot of the current situation of institutional housing needs across Greater Norwich Area.

Greater Norwich	All types of care	Long stay care home	Short stay care home	Dementia care home	Care home with nursing	Dementia care home with nursing	Housing with care
Total places to be commissioned	2126	337	117	548	469	223	432
Current number provided	1677	776	31	150	369*	163*	188

*Including half of the joint registered places for older people and dementia care

Table 7: institutional needs in Norwich area.

(Source: Strategic Model of Care – Care Homes; Strategic commissioning proposals for the future services (Norfolk County Council Cabinet - 13 October 2008))

Lifetime homes

- 5.8 The Joint Core Strategy states that high quality homes will meet people's needs whilst it also acknowledges that people have longer life expectancies, therefore the need for lifetime homes has increased. This issue is also addressed in the DM Policies Plan Policy 12 which requires that all public sector funded housing must be built to the Lifetime Homes standard by 2011 and all private housing development of 10 dwellings or more will be required to deliver 10% of all dwellings to meet lifetime home standards (or equivalent).

Housing need: Gypsy and Travellers and Travelling Showpeople

- 5.9 The JCS Policy 4 states the importance of providing accommodation for Gypsies and Travellers and Travelling Showpeople as identified in the Gypsy and Traveller Accommodation Needs Survey, which was fed into the single issue review of the East of England Plan on Gypsy and Travellers. This requires Norwich to accommodate an additional 15 permanent residential pitches between 2006 and 2011.
- 5.10 Due to the limitations of the urban area, there is no allocation made to provide such accommodation. However policy DM14 is permissive in relation of the provision of residential pitches for Gypsy and Travellers and Travelling Showpeople. The Council is working closely with neighbouring districts to encourage delivery of this type of accommodation.
- 5.11 In addition, the Greater Norwich Housing Partnership (GNHP) has commissioned Opinion Research Services (ORS) to draw up a sub-regional Gypsy and Traveller Accommodation Assessment (GTAA) to assess the need for additional authorised Gypsy and Traveller site provision within Greater Norwich over at least the next 5 years. Once completed in late 2011, this study will inform the requirement and identification of the broad location of any additional sites, and apportion these to local authority areas. It will also inform consideration of whether any extra site provision should be on public or private sites, and whether or not any of the local authorities need to plan for the provision of transit sites or emergency stopping places.

6. Site Allocations Plan: site selection process

- 6.1 As explained above, the JCS sets the level of new housing to be delivered in Norwich over the lifetime of the Site Allocations plan (2008 – 2026) at a minimum of 3000 dwellings. All the housing allocation sites included in the Site Allocations plan have gone through a site selection process which has comprised a number of stages, summarised below.

Call for sites

- 6.2 The first stage of the Site Allocations plan was to identify potential sites for development. A “call for sites” exercise was undertaken between February and April 2009. Developers, agents, community groups and the public were asked to suggest sites for possible development or change. The sites put forward, along with sites identified through the Local Plan and background studies, were all included in the initial list of sites published for public consultation. These sites were proposed for a variety of uses, including housing, employment, mixed uses etc.

First stage of Regulation 25 consultation: potential development sites

- 6.3 An initial public consultation took place between November 2009 and February 2010, involving a wide range of consultees, including statutory and special interest bodies and residents across the city. All neighbours within a certain distance of a proposed site were sent invitation letter for comments; approximately 8,000 such letters were sent to seek neighbour views. Exhibitions also took place across the city, and neighbourhood focus groups were held at different locations. Officers also attended a variety of group meetings to deliver presentations and answer questions. Around 400 representations were received to this consultation. These representations form part of evidence base of the site selection process.

Site assessment and selection -

- 6.4 Following the first stage of Regulation 25 consultation, and the consideration of consultation responses, all sites were then assessed against three key objectives - suitability, sustainability and availability.
- 6.5 Suitability assessment was undertaken by officers using a qualitative approach, and involved both desktop study and site visits. Full details of the methodology used are set out in the ‘Background Document for Site Selections’ which forms part of the documentation for the Regulation 25(2) consultation and is available on the Council’s website:
http://www.norwich.gov.uk/internet_docs/docs/Consultations/Site_allocations_plan/Background_document_for_site_selections.pdf

- 6.6 Sustainability assessment examines social, economic and environmental issues and was considered separately through the sustainability appraisal¹⁰ process.
- 6.7 Ownership information was also gathered for sites, regarding their availability and likely timescale for delivery. This information reinforced the assessment process and helps to form a robust evidence base for the deliverability of the potential development sites.
- 6.8 As part of the assessment process, a number of sites which were included in the first round of Regulation 25 consultation were not carried forward into the second stage of Regulation 25 consultation, or were carried forward but with amended boundaries. These sites fall into the following categories:

- *Sites to be included in the Development Management policies DPD*

Where proposed sites did not involve a change of use from their current use (eg a site currently in employment use proposed to be allocated for employment use), these were not carried forward as allocation sites in the second Regulation 25 document. Instead, these sites have been included in the Development management policies DPD: they were either integrated into the specific defined zones, e.g. employment area, or are covered by general policies.

- *Sites integrated into a larger site*

Some sites which were originally proposed as potential allocations in the first Regulation 25 plan were constrained by their size and shape, which did not constitute reasonable acceptable development on their own. However a number of these sites were integrated with neighbouring sites to form a better comprehensive scheme and to avoid piecemeal and stand-alone development.

- *Sites assessed to be 'not suitable' or 'less suitable'*

During the site assessment process, all sites were assessed against the suitability and sustainability criteria referred to above. As a result, a range of sites were found not or less suitable for development. A list of these sites and the reasons of discounting them were recorded in relevant consultation documents.

- *Site too small to allocate*

There were some sites, which although suitable for development, were not allocated due to their size. The original criteria used at earlier stages included sites of 0.1 hectare in city centre or 0.2 hectares in rest

¹⁰ Norwich Site Allocations DPD: Sustainability Appraisal report (Land Use Consultants, December 2010)

of the city. However, as some smaller sites can deliver relatively high density development, the threshold has been relaxed to include any site that could provide 10 or more dwellings even if under the size threshold. Sites below the size threshold which can only provide less than 10 dwellings were not carried forward; they will be treated as windfall sites.

Second stage of Regulation 25 consultation – shortlisted sites

6.9 The second stage of Regulation 25 consultation, on shortlisted sites, took place between January and March 2011. Schedule 1 at the end of this report sets out a list of the housing sites included in the Regulation 25(2) version of the plan (including sites allocated for a mix of uses including housing). All these sites were assessed as being suitable housing sites on the basis of the suitability, availability, and sustainability assessment referred to above.

6.10 The Council received approximately 100 responses to this stage of consultation.

Additional stage of Regulation 25 consultation

6.11 Following the consultation, a number of significant changes were proposed to a number of sites which included proposed amendments to site boundaries or proposed alternative uses, with some merit to be carried forward for additional consultation. A further stage of Regulation 25 consultation was then carried out between July and September 2011 for these sites, which are listed in Schedule 2. These sites have also been assessed against the criteria referred to above (suitability, sustainability¹¹ and availability) and therefore have the same 'preferred sites' status as the other Regulation 25(2) sites.

6.12 The further period of consultation ended on 30th September 2011. Approximately 200 responses have been received to the consultation.

Notes on specific constraints:

(1) Flood risk

6.13 The Level 2 Strategic Flood Risk Assessment has identified that Norwich City Council cannot meet the Joint Core Strategy housing targets for dwelling numbers wholly within Flood Zone 1 and therefore development sites within Flood Zone 2 need to be explored. The study has also concluded that the housing target could only be met by including sites falling in Flood Zone 2 area, which means that those proposed sites covered by Flood Zone 2 satisfy the overall sequential test. Therefore, for all sites

¹¹ Norwich Site Allocations DPD: Sustainability Appraisal report on Additional Allocations (Land Use Consultants, July 2011)

subsequently allocated in the site allocations plan, no further sequential test will be needed, although site specific flood risk assessments need to be completed in line with guidance in PPS25 at the planning applications stage for those not falling in Flood Zone 1.

(2) EIA requirement for the sites

- 6.14 The EIA regulations 1999 (as amended) state that it is necessary to consider the criteria listed in Schedule 3 of the regulation in terms of whether an EIA would be required if a site is within two kilometres of an SSSI. It is recognised that most of the sites listed in the site allocations plan are located within 2km of the SSSI sites. It is impractical to highlight the requirement for each site on whether an EIA is required in the site allocations plan. Therefore, whether an EIA is needed will be determined at subsequent planning applications stages. There is no specific policy about EIA requirement in this plan as it will be dealt with under the EIA regulations.

(3) Health and Safety Executive areas

- 6.15 There are a number of sites/areas identified by the HSE as notifiable installations as they pose specific issues of safety and possible harm to human health. Where an allocation is identified as such, the HSE will be consulted on the acceptability of the proposed development of such sites. This constraint is also specifically stated in the site allocation policies where applicable and in some instances the site policies will clearly state that the development of the site will be dependent on successful removal of the Hazardous Consent of the site or the development need to satisfy the HSE PADHI methodology as “Don’t Advise Against development”.
- 6.16 Sites were also considered against other major contamination issues such as former landfill sites. Where development is proposed within 250 metres of a former landfill site, this will be considered a significant constraint as the potential movement of methane underground. This constraint is highlighted in

7. Conclusion

- 7.1 The evidence included in this report provides background information to inform the housing policies in the emerging Development Management Policies Plan, and the housing allocations in the emerging Site Allocations Plan.
- 7.2 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 2012. This will need to take account of changes proposed to policies in light of the representations made to both

plans at Regulation 25(2) stage, and the additional Regulation 25 consultation on new or changed site allocations, updated monitoring information, the sustainability appraisal reports for both plans, and changes to national planning policy.

Judith Davison
Feng Li
October 2011

Schedule 1**Shortlisted sites at Regulation 25(2) stage containing housing**

[IMPORTANT Please note: This is a list of preferred option sites for consultation. However, no final decisions have been made at this stage as to whether these sites will be included in the Submission version of the plan]

Site Ref	Site Name	Proposed housing number	Use
H005	Norfolk Learning Difficulties Centre, Ipswich Road	40	Housing
H006	King Street Stores, King Street	25	Housing
H007	Former Pupil Referral Unit, Aylsham Road	15	Housing
H009	John Youngs Ltd, 24 City Road	60	Housing
H013(M)	60-70 Ber Street	20	Mixed use/housing
H027	Land adjoining Lime Kiln Mews, Drayton Road	15	Housing
H028	Land at Northumberland Street	15	Housing
H029	Land east Bishop Bridge Road	40	Housing
H029a	Land at Ketts Hill / Bishop Bridge Road	35	Housing
H030	Former Civil Service Sports Ground, Wentworth Green	75	Housing
H031	Start Rite Factory, Mousehold Lane	60	Housing
H032	Greyhound Opening	100	Housing
H033	Norwich Community Hospital site, Bowthorpe Road	120	Housing
H034	84-110 Ber Street	120	Housing
H034a	147-153 Ber Street	20	Housing
H035	Land at Lower Clarence Road	45	Housing
H037	81-93 Drayton Road	30	Housing
H039	Rear of 138 Hall Road	10	Housing
H040	120-130 Northumberland Street	30	Housing
H041	231-243 Heigham Street	25	Housing
H042	Westwick Street Car Park	40	Housing
H043	140-154 Oak Street	10	Housing
H047	Sleaford Green	15	Housing

H048	Vale Green	10	Housing
H049	Bowers Avenue	12	Housing
H052	Argyle Street	32	Housing
H054(M)	Norwich Mail Centre, 13-17 Thorpe Road	200	Mixed use/housing
E003(H)	Site north of Raynham Street	50	Housing
E005(H)	Heigham Water Treatment Works, Waterworks Road	150	Housing
M006	Deal Ground and May Gurney Sites	600	Mixed use/housing
M012	St Stephens Towers, St Stephens Street	250	Mixed use/housing
M014	Utilities Site	100	Mixed use/housing
M015	St Annes Wharf and adjoining land	400	Mixed use/housing
M017	Hobrough Lane / King Street	20	Mixed use/housing
M018	Dukes Court (former EEB Offices), Duke Street	15	Mixed use/housing
M019	Land at Anthony Drive / Sprowston Road	25	Mixed use/housing
M020	Norwich City Football Club, Kerrison Road	300	Mixed use/housing
M022	Land at Mountergate	300	Mixed use/housing
M023	Westlegate Tower	30	Mixed use/housing
M026	Greyfriars Road/ Rose Lane	20	Mixed use/housing
M034	Ber Street/ Rouen Road	30	Mixed use/housing
M035	Fire Station, Bethel Street	15	Mixed use/housing
M036	Barn Road Car Park	40	Mixed use/housing
M037a(H)	Land at/adjacent to Canterbury Place	15	Housing
M038	Hall Road District Centre	200	Mixed use/housing
M039	Aylsham Road District Centre	200	Mixed use/housing
M041(H)	Three Score Bowthorpe	1200	Housing
M042	Rouen Road Car Park and land at Garden Street	100	Mixed use/housing
M044	Land to rear of City Hall	40	Mixed use/housing
M046(H)	110 - 112 Barrack Street	15	Housing
M047	Pottergate car park	15	Mixed use/housing
M057	Land at Queens Road/ Surrey Street	40	Mixed use/housing
M060	48-62 St Stephens Street & Malthouse Road	100	Mixed use/housing

NOR0004(H)	Site in Wherry Road	75	Housing
NOR0016(H)	144-162 King Street	30	Housing
NOR0026(H)	Norwich Union Car Park, Brazen Gate/ Southwell Road	70	Housing
NOR0031	Busseys Garage Site, Thorpe Road/ Lower Clarence Road	25	Mixed use/housing
NOR0043(M)	165-187 Aylsham Road	30	Mixed use/housing
NOR0045(H)	Industrial Sites, Havers Road	120	Housing
NOR0062(H)	Industrial sites, Starling Road	40	Housing
NOR0065(H)	Oak Street / Sussex Street commercial sites, 160-162 Oak Street	15	Housing
NOR0067(M)	Furniture store, 70-72 Sussex Street	15	Mixed use/housing
NOR0073(H)	Spring Grove Laundry, Oak Street	15	Housing
NOR0078(H)	Thorndick & Dawson, 75-81 Pottergate	15	Housing
NOR0082(H)	Hunters Squash Club, Edward Street	25	Housing
NOR0092(H)	124-128 Barrack Street	30	Housing
NOR0099(H)	Decco Ltd, Chalk Hill Works, Rosary Road	25	Housing
NOR0124(H)	Site of former Earl of Leicester PH, 238a Dereham Road	10	Housing
NOR0125(H)	Cumberland Hotel, 212-216 Thorpe Road	20	Housing
NOR0137(H)	Hewitt Yard, Hall Road	20	Housing
NOR0143(H)	Land adjacent to and including 349a and 349b Dereham Road	25	Housing

Schedule 2: Sites listed in the additional Regulation 25(2) consultation

[IMPORTANT Please note: This is a list of preferred option sites for consultation. However, no final decisions have been made at this stage as to whether these sites will be included in the Submission version of the plan]

Ref	Site name	Proposed development	Proposed housing number	Reason for inclusion
E005	Heigham Water Treatment Works, Waterworks Road	Mixed use – housing, small industrial and open space	150	Amended boundary
E015	Kerrison Road/ Hardy Road, Gothic Works	Housing-led mixed use development	250	Proposed alternative use
H006	King Street Stores and Sports Hall	Housing-led mixed use development	50	Extended boundary
H029	Land east of Bishop Bridge Road	Housing development	50	Extended boundary
H029b	Gas holder at Gas Hill	Housing development	20	Newly proposed site
M007	Part of former Lakenham Sports and Leisure Centre	Housing development	65	Amended boundary
M009	Land west of Bluebell Road, Bartram Mowers Ltd	Housing development for the elderly	150-200 ¹²	Reduced boundary / proposed new use
M020	Land adjoining Norwich City Football Club, Kerrison Road	Mixed use development	250	Amended boundary
M049	Mile Cross Depot	Mixed use to include housing and small workshop units	75	Proposed new use
NOR0093	Van Dal Shoes, Dibden Road	Housing development	30	Change of status
M061	Norfolk House, Exchange Street	Mixed use development	20	Newly proposed site

¹² This figure does not contribute to the overall housing requirement

Draft Employment Topic Paper (October 2011)

Introduction

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 early - mid 2012, and will be submitted to the Secretary of State for public examination later in 2012. 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.
2. The employment topic paper provides information about the way that employment policies in the Development Management Policies DPD have been developed and how they respond to national planning guidance and the emerging National Planning Policy Framework.. It covers
 - The role of evidence studies already undertaken for the Joint Core Strategy in informing the direction of policy and implications of more recent local economic trends and indicators;
 - The characteristics of the city's established employment areas including available evidence of demand for land and premises
 - The importance of the city centre as a focus for new development to support strategic employment growth and regeneration particularly for office development.
3. This paper will not look in detail at issues of retail hierarchy and the definition of district and local centres and retail frontages. These are covered in a separate paper (*Retail and town centre hierarchy and management of activities in centres, to be presented to the SDP in November 2011*)).

Economic Overview

4. The UK economy benefited from a sustained period of growth and relative prosperity for most of the first decade of the 21st century, characterised by low interest rates and low inflation, coupled with generally high levels of employment. The period since late 2007 has, however, been dominated by the repercussions of the global banking crisis and subsequent "credit crunch" which have impacted seriously on all major western economies and resulted in a recession in 2008-09 potentially more severe than any since the second world war. Although now technically out of that recession, the UK faces ongoing challenges in re-establishing economic growth and reducing a very substantial national budget deficit to manageable levels. At the time of writing (October 2011) renewed concerns over the prospects for resolving the European debt crisis are resulting in extreme volatility in international stock markets amid fears of a

possible “double-dip” recession. Nationally, the coalition government’s austerity measures (in particular the impacts on unemployment levels of deep cuts in public sector finances) have yet to be fully realised, although credit easing incentives and other measures are in hand to help improve conditions for businesses.

5. Beyond the immediate priorities arising from the economic downturn, the economy faces challenges from longer-term trends including globalisation of markets and services, rapid developments in high-speed information and communications technology for both social and business networking and the sustained contraction in manufacturing in the face of competition from still-expanding Asian markets. Greater Norwich has not been immune to this trend; manufacturing has had to be increasingly innovative and to focus on relatively low volume niche markets to compete. Service sector jobs are also under threat from outsourcing and offshoring, as global companies try to save money by shifting many functions that were once done internally.

Context

Population

6. The latest population estimate for the city of Norwich at mid 2010 is 143,500 , which is an increase of almost 19% from the 2001 Census figure of around 121,000. Norwich, along with Broadland and South Norfolk districts, is forecast to have a high rate of population growth over the next 15 years: the city’s population is projected to grow by 13% to 2026, an additional 16,800 people .
7. The city’s age structure is forecast to change over the next 15 years. Norfolk’s population is predicted to get older on average, in line with national trends, although this is less marked for Norwich than for the remainder of Norfolk. Norwich’s age structure at 2026 is predicted to be 35.5% in the 0 -24 age range, 47.5% for the 25 - 65 age range (in both these categories, Norwich has the highest percentage for any Norfolk district), and 17.1% for the 65+ age range (the lowest out of the Norfolk districts) . At present the percentage of Norwich’s population aged 65 and above is only 13.73%.

Employment levels

8. Latest figures available indicate that there are 84,450 jobs within the city council area¹ . The most recent published analysis of employment by occupation relates to 2008, at which time there were 90,700 recorded employee jobs in the city. 6,600 of these were in manufacturing (7.3%), 3000 in construction (4.8%) and 80,900 in services (89.1%), with the largest employers in the service sector being: finance, IT and other business activities (26,900); public administration, education and health (23,700); and distribution, hotels and catering (22,200).

¹ Source: NOMIS Labour Market Information

9. Norwich is particularly reliant on the finance and business service sector which accounts for 29.6% of the workforce as against 22.0% nationally². The city also has a disproportionate dependency on large employers (68 employ 40% of the workforce) making the economy particularly vulnerable to global investment decisions and macro-economic trends. On the other hand the city can offer a particularly diverse business base, with strengths including the financial services cluster, creative industries, health, life and environmental sciences, advanced engineering, retail, construction, tourism and public administration. The city's retail centre has been among the top 10 in the country based on consumer spend³ and its relative isolation from competing centres suggest that the strength of retail and other service centre functions in Norwich is likely to continue⁴.

Unemployment and Deprivation

10. Despite its relative prosperity in recent years, Norwich nevertheless has persistent pockets of high long-term unemployment and deprivation. The City scores as high as 70th most deprived of the 326 local authority areas in England (based on an average of ward indicators of deprivation) and is the third most deprived in the eastern region behind Great Yarmouth and Luton. 23 out of the 79 Norwich LSOAs⁵ are within the 20% most deprived in the country.
11. At August 2011 recorded unemployment in the city based on the Jobseekers Allowance claimant count was 4,498 (a rate of 4.4%, compared with 3.1% in the eastern region and 3.9% nationally). Unemployment has risen steadily from a low point of 2,364 (2.5%) in November 2007 but has not yet reached the peaks recorded in the early 1990s recession..

Recent economic trends

12. Recent indicators suggest that in the last two years Norwich City has suffered disproportionately (compared with the remainder of the Greater Norwich area) in terms of overall loss of employment. In 2006 Norwich recorded a total of 99,700 jobs⁶. By 2008 this had already fallen back to 96,500. Latest figures (end 2010) show a further sharp fall to 84,450 in the past two years. Although the wider Norwich area experienced a net loss of 6500 jobs over this period the city of Norwich has lost more than 12,000 jobs – 12.5% of its employment base, with redundancies compounded by dispersal of employment to the urban fringe. This is illustrated in the graph below analysed by ward. There has been a particularly significant loss of employment in Bowthorpe and Lakenham wards, the former having lost some 65% of its employment base partly as a result of the relocation of

² Source: NOMIS Labour Market Information.

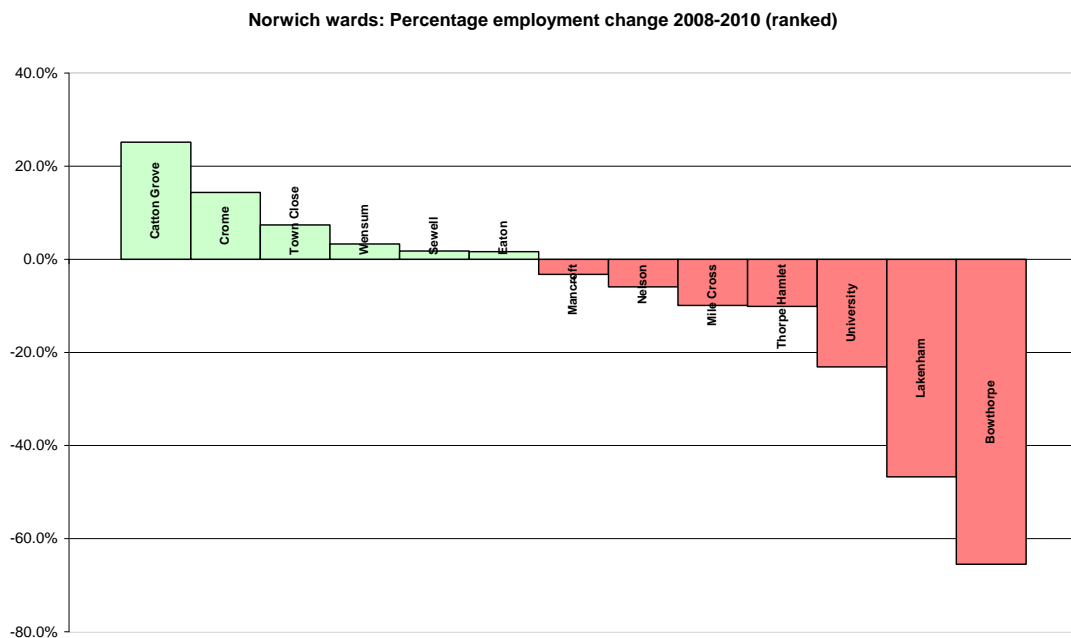
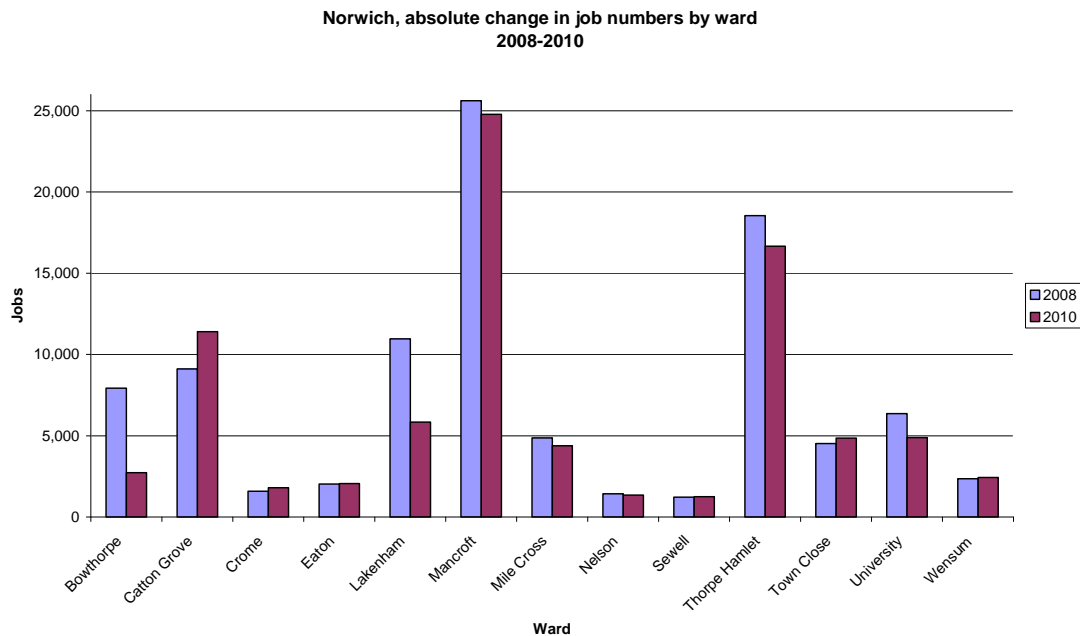
³ CACI Retail Footprint 2011.

⁴ Quoted in GNDP Greater Norwich Economic Assessment report 2009

⁵ LSOA = Lower Level Super Output Area – subdivisions of wards and parishes for which Census and other statistical data is aggregated and published

⁶ Source NOMIS Labour Market Information. Figures exclude self-employed, government-supported trainees and HM Forces. Total employment will be higher.

3000 jobs at the Aviva data centre from the Bowthorpe employment area to Broadland Business Park. The loss of employment in Lakenham may be partly attributable to the contraction in and relocation of Norfolk county council's facilities management service (NORse) previously based at County Hall.



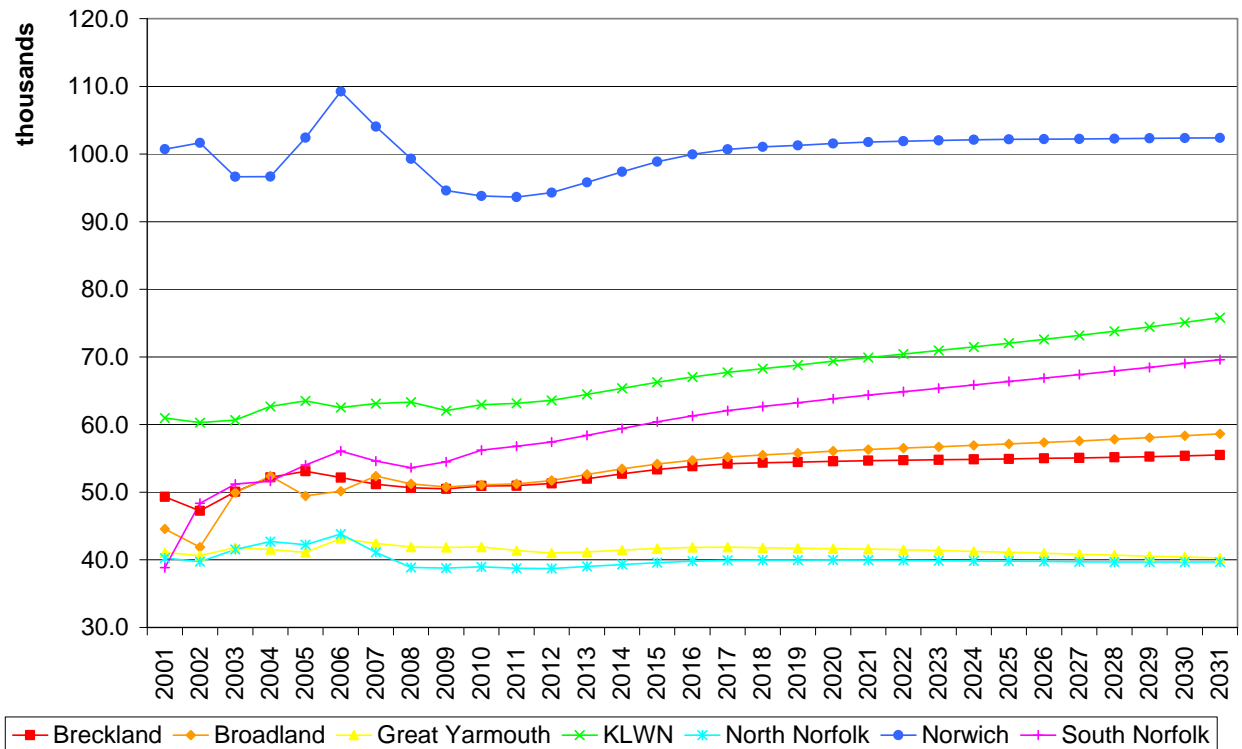
13. The East of England Forecasting Model (EEFM) brings together a range of key variables including economic output, employment, population and housing. These variables are all linked meaning that changes in any one

of them can potentially affect all the others. The Model shows what impact decisions in one policy or geographical area might have on others. It also reveals the range of influences that might have to be taken account of if future growth in any one area is to be achieved.

14. The EEFM was built by Oxford Economics, one of the most experienced forecasting companies in the country. It is based on tried and tested methodology and produces consistent comparable forecasts for the UK, East of England and every local authority district and unitary in the region. Although the contract with Oxford Economics has now ended, steps are being taken, led by Cambridgeshire County Council, to find a new contractor to provide ongoing outputs from the Model.
15. The graph below shows outputs from the EEFM based on the corrected Autumn 2010 baseline scenario. This scenario is unconstrained by policy and takes into account various assumptions regarding economic recovery over the next few years. The figures show total employment therefore including those who are self employed as well as those who are employees.
16. The Model forecasts total jobs will be at their lowest in 2009 and begin to recover thereafter. Total jobs numbers are then forecast to rise but not reach 2007 levels until 2014. Jobs recovery in the districts is forecast to vary considerably: Breckland, Broadland, King's Lynn and West Norfolk and South Norfolk are all forecast to recover quicker than the county as a whole in terms of total jobs while Great Yarmouth, North Norfolk and Norwich are not forecast to achieve pre-recession total jobs levels for the entire forecast period (2031).
17. It must be remembered that these forecasts are based on, amongst other things, Annual Business Inquiry (ABI) surveys and are therefore more reliable at larger geographies. Nevertheless they are considered as a reasonable indicator of future local economic development⁷.
18. The implications of the EEFM are that *without policy interventions*, the prospects for a recovery of job numbers to pre-recession levels within Norwich are extremely slim. If the aspirations for economic growth within the city are to be realised, it is incumbent on this council, the Greater Norwich local authorities and other agencies within the local enterprise partnership to work actively together to ensure that the city can benefit from future investment and appropriately located economic development in accordance with the Greater Norwich Joint Core Strategy and development plan documents.

⁷ Commentary in paras 12-16 adapted from Norfolk County Council Employment Land Monitor 2010-11, pre-publication draft, used by permission.

Baseline employment forecasts for Norfolk districts (corrected Autumn 2010)



Employment policy context

19. National planning policies relating to economic development and employment are set out chiefly in Planning Policy Statement 4 (PPS4) published in December 2009. PPS4 advises local authorities to adopt a positive and constructive approach to applications for economic development and to treat applications which secure economic growth favourably.. Economic development is defined to include “development within the B use classes⁸, public and communities uses and main town centre uses [as well as] development which achieves at least one of the following objectives:

1. provides employment opportunities
2. generates wealth
3. produces or generates an economic output or product”.

⁸ As set out in the Town and Country Planning (Use Classes) Order 1987, as amended. B class uses are (broadly) offices other than those providing a service direct to the visiting public, light and general industry, wholesale distribution and research and development activities.

20. PPS4 also emphasises the importance of protecting and planning positively for town centres, stating that main town centre uses⁹ should be focused in existing centres with the aim of offering a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities. Although these issues are considered more fully in the retail topic paper, it is important to note that the inclusion of offices within the definition of *main town centre uses* implicitly supports and reinforces a development strategy predicated partly on encouraging major new office growth within Norwich city centre.
21. Also relevant are the general principles of PPS1 *Planning for Sustainable Development* and PPG13 *Transport*, which set out a general requirement to plan for and promote sustainable and accessible patterns of development, minimise the need to travel, make the most efficient use of land and resources and address climate change.
22. 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 to the planning system that the government is introducing to both streamline and simplify the planning process and enable local communities and neighbourhoods to become more fully involved in it. These include the Localism Bill (which provides for the abolition of Regional Spatial Strategies and the housing growth and jobs targets therein), proposed amendments to the General Permitted Development Order to allow additional types of development and changes of use without the need to apply for permission, and consultation on Planning for Travellers.
23. The NPPF is strongly pro-development, and incorporates a general “presumption in favour of sustainable development”. It places great emphasis on the promotion of sustainable economic development through the planning system. Local planning authorities are required to prepare local plans on the basis that objectively assessed development needs should be met, with sufficient flexibility to respond to rapid shifts in demand or other economic changes. One of the implications of the NPPF is that local plans will need to re-incorporate policy content from PPSs, and will need to be written more explicitly, especially where the Joint Core Strategy does not include sufficient guidance. Any amended policy content will have to be justified by evidence.
24. The NPPF’s objectives in relation to economic development are to:

⁹ *Main town centre uses* are as defined in PPS4 paragraph 7: retail; leisure; entertainment facilities and the more intensive sport and recreation uses (cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism (theatres, museums, galleries and concert halls, hotels, and conference facilities).

- plan proactively to meet the development needs of business and support an economy fit for the 21st century
- promote the vitality and viability of town centres, and meet the needs of consumers for high quality and accessible retail services; and
- raise the quality of life and the environment in rural areas by promoting thriving, inclusive and locally distinctive rural economies.

25. Planning positively and strategically to support business, ensuring an adequate supply of land and premises for economic growth and promoting inward investment and innovation (particularly in key sectors and clusters) are re-emphasised in the NPPF. As now, the guidance advises against long term protection of employment allocations, but unlike PPS4 (which merely states that alternative uses should be “considered”), the NPPF states that *“applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses”* (our emphasis).

26. The specific proposals in the NPPF likely to affect development management policies for economic development are:

- a) its advice that proposals for alternative uses on employment land should be “treated on their merits having regard to market signals”. This would tend to run counter to the Joint Core Strategy’s presumption (supported by evidence) that such land should be protected for its designated purpose;
- b) its abandonment of the term “main town centre uses” (see note 9) and the previous presumption that such uses should be required to seek locations in designated centres as a first preference. Under the NPPF’s proposed changes the “town centres first” presumption would now only apply to retail and leisure development and there would be no obligation for proposals for office development, hotels or arts and cultural uses to justify a non-town centre location. This would make it particularly difficult to retain existing and attract new office development in the city centre (as required by the Joint Core Strategy) and could put more pressure on designated employment land to be released for other purposes.
- c) the removal of the presumption that previously developed “brownfield” land should be used first before considering greenfield land: the implication of this is an inherently more dispersed pattern of development which could heavily favour sites on the Norwich urban fringe for employment growth at the expense of sites in the city and particularly those earmarked for regeneration in the city centre.

27. Additionally the separate proposals to bring changes of use from offices to housing within the scope of permitted development could significantly undermine or even completely negate local policies seeking to maintain a supply of suitable premises for small business needs and to protect against the loss of offices generally.

28. Given the high level of response to (and the controversy generated by) the draft document, the NPPF is unlikely to be published in its final form until early 2012. Some (possibly significant) updating and reviewing of policies in both the Site Allocations and Development Policies DPDs may be necessary in the light of the advice in the revised NPPF but until that final version emerges there is considerable uncertainty as to what the precise content of local policies should be
29. The East of England Plan (May 2008) is the adopted Regional Spatial Strategy for the East of England, however it is due to be abolished once the Localism Bill is enacted in November 2011. The East of England Plan specifies the number of new homes and jobs to be provided in the Norwich area to 2021. It identifies Norwich as a key centre for development and change and a main focus for growth in the East of England for new homes, jobs, leisure, cultural and educational development. It also sets the context for policies in the adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) in relation to a number of areas, including planning for strategic employment growth in key sectors, supporting the city centre as a focus for new employment, particularly media and creative industries, finance and insurance, and information communication technologies, and encouraging appropriate employment growth at Norwich airport.
30. The JCS was developed by the Greater Norwich Development Partnership (GNDP), a partnership of the three councils of Broadland, Norwich and South Norfolk, working together with Norfolk County Council. The JCS was adopted in March 2011 and sets out a strategy for growth of the Norwich policy area. Objective 4 of the plan is *to promote economic growth and diversity and provide a wide range of jobs*. Existing employment sites will be safeguarded and enough land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. 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. The Airport is listed within a range of key locations in the Norwich Policy Area for strategic employment growth.
31. Policy 6 of the JCS sets out a number of separate policy strands to implement this objective and provide for the forecast need for 27,000 additional jobs in the period 2008-2026. This includes providing appropriately for the needs of (and maintaining a supply of premises for) small and medium sized businesses; allocating sufficient employment land in accessible locations to meet larger scale needs; overcoming constraints to the release and development of key sites and protecting land already identified for employment purposes only for uses which are ancillary to and supportive of their employment role. It also provides for the expansion of further and higher education and training; enterprise hubs in selected locations (including the University and Norwich Research Park) and support for tourism, leisure and the cultural and creative industries.

The evidence studies

32. The evidence base to support JCS's policies is set out in that document at Appendix 2. This includes the following documents which also form part of the evidence base relating to employment and economic development for the DM Policies and Site Allocations DPDs.

Greater Norwich Employment Growth and Sites and Premises Study 2008 (Arup and Oxford Economics)

33. The Greater Norwich Employment Growth and Sites and Premises Study (referred to in this paper as *the Arup study*), provides evidence that the labour market in greater Norwich is relatively imbalanced, with an inadequate number of better-paid intermediate and higher level jobs. This is a contributory factor in the relatively high concentrations of deprivation in urban Norwich. There is evidence that Norwich has yet to fulfil its potential in generating higher value-added 'knowledge economy' jobs.

34. There is a need to ensure appropriate provision of employment land and premises. Key issues will be the need to bring forward key employment sites, protecting them from residential development and adopting a flexible approach to managing land supply.

35. Within Norwich, there have been shortfalls in the range and variety of industrial land and premises and these need to be addressed:

- Smaller firms have experienced problems with finding appropriate premises, particularly manufacturing businesses.
- There is a need to retain a range of industrial estates and other employment sites within Norwich for business use.
- There is a need to retain different types of employment in and around the city centre as part of the overall attraction of the city and to counteract trends towards 'hollowing out' of the city through employment moving to the urban fringe¹⁰

36. Many office premises are out of date and need to be updated to counter less sustainable patterns of extensive, lower-density office development on the edge of the city. Intensification and expansion of office floorspace needed within the centre, with at least 100,000 sq.m of new offices indicated as being required by 2021 to meet growth needs.

Greater Norwich Economic strategy 2009-2014

37. The Greater Norwich Economic Strategy includes four objectives and supporting priorities which provide further context for the policies in the Joint Core Strategy and the site allocations and Development Management Policies DPDs:

¹⁰ The removal of the town-centres first presumption for office development in the draft NPPF, if retained, may give rise to difficulties in addressing these needs and providing a sufficiently sustainable balance between city centre and out of centre office growth.

Objective 1: Enterprise - To strengthen the area's economy, maximise diverse employment opportunities and ensure that businesses can flourish

- *Priority 1: Create more sustainable jobs by increasing the number of new business start-ups and supporting the growth of small and medium sized enterprises.*
- *Priority 2: Support the growth of the knowledge economy by encouraging key sectors and facilitating the attraction and development of businesses which can exploit the commercial potential of the research expertise in the UEA and Norwich Research Park.*

Objective 2: People and Skills - To improve the skills of the labour force to ensure that it matches the needs of existing and potential employers and local people benefit from job growth

- *Priority 1: Raise the aspirations of local people, particularly young people, and provide appropriate learning opportunities.*
- *Priority 2: Address mismatches between skills availability and skills requirements*
- *Priority 3: Ensure there is a strong economic component to regeneration and neighbourhood renewal strategies*

Objective 3: Infrastructure for Business - Ensure that the area has the necessary infrastructure and quality of environment to attract and retain investment and support business growth

- *Priority 1: Contribute to the development of an improved and sustainable transport and communications infrastructure to support planned growth and development*
- *Priority 2: Maintain an appropriate supply of suitably located employment land and premises*
- *Priority 3: Ensure that the investment required in public utilities infrastructure and other essential infrastructure takes place so that the development of key sites is not constrained.*

Objective 4: Profile and Investment - To raise the profile of Greater Norwich as a high quality place to live work and visit

- *Priority 1: Promote a strong and coherent image of Greater Norwich capitalising on its particular strengths as a business location.*
- *Priority 2: Attract and retain private and public investment to drive growth and regeneration*
- *Priority 3: Support the continued development of a vibrant City Centre that is unique in its retail, cultural and heritage offers*

Ideopolis

38. The Ideopolis Research undertaken by the Work Foundation found that only a limited number of city regions, such as Norwich, have the prerequisites to promote the knowledge economy. Norwich should develop a defined strategy around the three core specialisms of financial services, creative industries and science. There is a need to attract more high skill

organisation and develop the skills of the existing population. There is also a need to reinforce an image that will attract businesses and people.

Review of Land identified for Employment purposes

Table 23.1: Existing employment sites in Greater Norwich by district, site size, policy contribution and assessed marketability

Name of site/area	Site Size (Hectares)	Estimated Existing Floorspace (square metres)
City Centre		320,000
Whitefriars		27,000
Duke Street		25,000
Smurfit Sheetfeeding	1.30	8,200
Sweetbriar Road	52.00	44,000
Bowthorpe Employment Area	85.00	68,000
Hall Road	68.00	64,000
Norwich Airport Industrial Estate	48.00	120,000
Norwich Livestock Market	16.00	6,000
Old Hall Road	1.70	7,300
Vulcan Road/Fifers Lane	93.00	155,000
Mason Road/Mile Cross Area	32.00	32,000
Whiffler Road	59.00	64,000
City Trading Estate	46.00	66,000
Northumberland Street/Waterworks Road	4.20	6,600
Europa Way	3.90	3,105
Drayton Road/City Care	5.90	20,000
Guardian Road inc Bowthorpe School	2.82	10,952
Bayer Crop Science	24.00	27,000
Deal Ground	8.20	0
Utilities site	6.90	0
Kerrison Road/Hardy Road	4.21	2,500
Carrow Works	5.00	0
County Hall	5.00	0
<i>Sub Total Norwich City</i>	<i>572.13</i>	<i>696,457</i>

Note: the table above partially reproduced from the Arup Study needs to be reviewed so that site areas are consistent with the site areas given below and the areas shown on the DM Policies DPD proposals map.

39. A total of 313.9 hectares of land is identified in the adopted City of Norwich Replacement Local Plan as employment areas prioritised for B class development (industry, warehousing, research and development and offices) including single-user employment sites protected under saved policy EMP7, proposed employment development sites allocated under policies EMP9 to EMP15 and office development sites in the city centre allocated under policy EMP16. An additional 5.9 hectares at Hall Road is identified specifically for development for vehicle showrooms under policy EMP6.
40. A review of all existing employment allocations was carried out in 2010, to assess whether or not it was appropriate to maintain their status as areas protected for employment (B class business) purposes. The review took account of development which has been consented and completed on employment land since the adoption of the Replacement Local Plan, site-specific considerations of development viability (including market signals) and the relative contribution that employment uses were likely to make, compared with other forms of development, toward achieving wider regeneration benefits. The review considered the more flexible approach to economic development set out in Planning Policy Statement 4: *Planning for sustainable economic growth* (PPS4) and responded more particularly to the recommendations of the *Greater Norwich Employment Growth and Sites and Premises Study*, (the Arup Study). 2008
41. The Arup study concludes that there is an overriding need to make appropriate provision for employment land to support growth both through making new land allocations to accommodate the necessary quantum of floorspace, and by strengthening policy protection for and making the best use of established employment areas. It shows that the majority of employment areas in Norwich and the wider area were well-used. Most had high occupancy levels, but there is potential to enhance and accept higher density development and more intensive uses on some of the allocated sites.
42. In response to recommendations in the Arup Study and to reflect site-specific considerations of development viability or changes in planning circumstances a number of sites previously identified mainly for employment development in the Local Plan have been reallocated either entirely or in part in the Site Allocations Plan for other purposes, these being:
- The Deal Ground, Trowse: mixed use development to include housing, employment, retail and community uses (site M006);
 - Utilities Site, Cremorne Lane, mixed use development to include housing, employment, renewable energy generation (site M014)
 - Havers Road (Part) – reallocated for housing development (site NOR0045 (H)).
 - City Trading Estate – part north of Raynham Street reallocated for housing development (site E003 (H)). The reallocation of this and the

Havers Road site for housing reflects the fact that these areas are very little used poor quality employment areas and that housing development can secure wider regeneration benefits in particular the improvement of a strategic cycle route.

- Laurence Scott site, Hardy Road/Kerrison Road – part south of Kerrison Road reallocated for housing within larger allocation adjoining Football Club (site M020). The remainder of the original allocation at Gothic Works, Hardy Road is one of the additional sites subject to further current consultation with a view to potentially reallocating it for mixed use development with housing, employment and leisure uses should LSE relinquish the site in the medium term.

43. The following sites have been re-designated for other purposes or deallocated:

- Northumberland Street (eastern half, former Wensum Clothing factory): developed for housing
- Greyfriars Road,/Rose Lane (former office site developed principally for housing)
- Former Jarrold Printing Works site, Barrack Street (consented development for offices, residential, hotel: partially implemented)
- Smurfit Sheetfeeding, Whitefriars (reallocated for mixed use development in the Northern City Centre Area Action Plan)
- Botolph Street/Pitt Street (reallocated for mixed use development within the larger Anglia Square development site in the Northern City Centre Area Action Plan)

44. The following sites are retained and carried forward as employment allocations for future development in the Site Allocations Plan:

- Land south of Hurricane Way
- Hall Road Livestock Market Site (excluding B and Q)

45. The following sites are retained as employment areas protected by Development Management Policies Plan policy DM16.

- Sweet Briar Road
- Bowthorpe Employment Area
- Hall Road/Bessemer Road (boundary amended to exclude expanded Hall Road District Centre site and include former car showroom areas)
- Airport Industrial Estate
- Vulcan Road/Fifers Lane Industrial Estate
- Mason Road/Mile Cross Lane Area
- Whiffler Road Industrial Estate
- City Trading Estate (boundary amended to exclude land north of Raynham Street and include Cushions timber yard and other employment sites to the south of Heigham Street)
- Land west of Northumberland Street
- Europa Way, Bracondale

- Drayton Road and Citycare Depot (amended to exclude land at Havers Road)
 - Guardian Road (extended west to include land at and around the Henderson Business Centre off Bowthorpe Road)
 - Carrow Works
 - Bayer Cropscience, Sweet Briar Road
46. The retained employment areas above total 295.5 hectares and reflect the recommendations of the Arup Study to continue to safeguard the majority of employment areas, particularly those adjoining and with good access to the ring road. Aside from the relatively small number of sites reallocated for mixed use development Norwich has not experienced any large-scale reallocation of former employment land or loss to residential development.
47. Potential for employment within mixed use allocations is recognised in the Northern City Centre Area Action Plan and the Site Allocations Plan both of which are expected to support a need for smaller scale employment needs locally, alongside protection of suitable sites and premises through policy DM17. The need to continue to protect small business sites is borne out by more recent evidence collected for the Regional Economic Strategy which shows an increase in the number of small business startups in Greater Norwich between 2009 and 2010. The plan will also support appropriate employment development to support district and local centres.
48. In addition a substantial area of the city centre extending from Mountergate to Ber Street has been identified as a priority area for office development. The Joint Core Strategy gives an indicative figure of 10 hectares for potential office development here, equating to the 100,000 sq.m of floorspace need identified in the Joint Core Strategy. It is expected that individual development opportunities will be supported in this area as part of an overall regeneration initiative with potential capacity identified in the St Stephens Masterplan for 50,000 of commercial floorspace including replacement and additional offices.

Land Availability and Take-up and Market Indicators

49. Since the Arup study was published in June 2008, the economic downturn has impacted both on take-up rates for industrial and warehouse floorspace and on the overall availability of stock. Most recent market commentaries¹¹ suggest that prime rental values have declined by some 8%, prime space realising **£5.75 per square foot** as against £6.25 in the last quarter of 2007. Downward pressure on rents for poorer quality space has been more marked, falling from £3.50 to **£2.50 per square foot** in the same period. Total industrial floorspace stock in the Norwich area is estimated at **10,785,900 sq. ft.**, a 2.1% increase over the position in 2007 although availability as a proportion of total stock has increased from 5% to 8%. Take-up in Norwich fell to its lowest levels in almost ten years in the

¹¹ All quoted property market information from Bidwells Data Book 22

first half of 2011, with only 109,000 sq ft of lettings. The largest transaction was the 12,700 sq ft letting to Fitzmaurice Carriers at Rice Way (Salhouse Road, Broadland District). This was the only letting over 10,000 sq.ft in the area.

50. The rate of development on and take-up of employment land recorded in city and county council monitoring reports is similarly depressed, with only 0.2 hectares of employment land taken up in the City in 2010-2011 (the Barclays office development at the former Jarrold site at Barrack Street). Equivalent figures are not yet available for greater Norwich, but the county council's monitoring report for 2009-10 showed that employment land take-up across the whole of the Norwich Policy Area fell to 1.7 hectares in that year – a historic low and well below the long-term average of 11.6 hectares a year over the preceding ten years. Average land take-up within the city over the same period was 1.9 hectares a year but this has fallen to 1.8 hectares factoring in the very limited B1 development recorded in 2010-11.
51. Regional market commentaries report positive signs in the take up of and demand for industrial property across the region. For the Eastern region as a whole industrial take-up of 3.5 million square feet was recorded in 2010 with a similar figure forecast for 2011 based on performance in the first six months and “expected to push historic peak levels if the strong market continues”. Prime rents are expected to increase by 2.3% per annum over the next five years as occupier demand and the shortage of better quality industrial floorspace act as a major catalyst to growth. Within this overall picture the local market indicators for Norwich are based on a relatively small number of property transactions but there are signs that occupational demand is improving. As the market recovers it can be expected that Norwich will experience increases in demand for good quality floorspace:

Note: this section is expected to be further updated with statistical data from the published Employment Land Availability Monitor 2010-2011 (report in preparation and awaited from Norfolk County Council). Will contain updated overview of take-up rates, land availability in GNDP area/Norwich Policy Area, development rates over the past year.

THE POLICIES

52. The key findings of the evidence studies have directly informed the content of the Joint Core Strategy and the DM Policies DPD in relation to employment, some of the key policy drivers being the need to protect and enhance the City's existing stock of employment land and premises, to ensure an adequate range and choice of sites and premises for small businesses, to exploit the potential of the city centre as a focus for new employment growth in key sectors and (in particular) to proactively plan for a significant quantum of new high quality office floorspace in the city centre as a component of identified growth needs across the Greater Norwich area.

Promotion and protection of employment land – Policy DM16

53. The employment areas in Norwich as defined in the Development Management Policies DPD are shown on the map on page xx
54. Policy **DM16** sets out policies for the defined employment areas within Norwich, seeking to protect them principally for employment economic development uses and to safeguard a stock of land to cater for future anticipated growth. In this it interprets the requirement of JCS **Policy 12** to retain and improve local jobs, including through the retention of existing employment allocations and identified sites; and JCS **Policy 5** requiring the allocation of sufficient land to provide choice and range of sites and stipulating that land identified for employment uses on proposals maps will only be considered for other uses that are ancillary and supportive to its employment role.
55. The Arup Study concluded that *there is no case for the wholesale de-designation of any of the existing employment sites for other (non B group) uses. This is because all sites are in active use and excepting the most recent allocations largely occupied, with low vacancy levels mostly associated with natural churn rather than lack of demand. Indeed this suggests to us that sites deserve strong policy protection, especially to the ring road sites and newer larger allocations.*¹²
56. The factors contributing to this conclusion included
- Strong market for industrial and warehouse floorspace in the ten years preceding the study
 - Shortages both of good quality space and freehold land
 - Significant constraints on the delivery of new employment allocations within the urban area, focusing demand largely on established estates and larger greenfield allocations such as Broadland Business Park and Wymondham.
57. Saved policies EMP4 and EMP5 in the existing City of Norwich Replacement Local Plan set out a two-tier approach to new development and the management of uses within employment areas; seeking to safeguard the better quality (“prime”) employment areas¹³ defined under policy EMP4 predominantly for B1, B2 and B8 uses and accepting other uses only exceptionally. A broader range of uses is accepted in the general mixed use employment areas subject to policy EMP5 with the proviso that the proportion of B class uses on these estates should not drop below 50%.
58. The Arup study concluded that there should be no differentiation between prime and general employment areas, as all such sites will and should

¹² Arup Study section 23.8, Page 265.

¹³ PRIME EMPLOYMENT AREA: A high quality, well designed *Employment Area* which is used (or identified) predominantly for industrial and warehousing purposes. (City of Norwich Replacement Local Plan 2004, Glossary).

continue to play a significant role in meeting future employment needs, also recognising the particular potential of these sites for new development, improvement and upgrading. This has been taken on board within Joint Core Strategy with a clear priority given to employment uses and uses directly ancillary to that role. This Development Management Policies DPD, accordingly proposes a single policy approach for employment areas within policy DM16 with the aim of safeguarding and making the best use of all designated employment land..

59. PPS4 requires local planning authorities to ensure that development plans *positively and proactively encourage sustainable economic growth*: these principles being carried forward in the emerging National Planning Policy Framework. Economic development in terms of PPS4 is development within the B Use Classes (business), public and community uses and main town centre uses¹⁴ as well as a range of other uses which are contributors to economic growth. PPS4's definition of economic development extends to uses which provide employment opportunities, generate wealth or produce or generate an economic output or product. That definition, with appropriate exclusions for uses which are clearly more appropriately located in centres, will be the basis for considering development proposals in employment areas where this does not prejudice their function.
60. The emphasis of the emerging NPPF is very much on supporting businesses and their particular development needs where this does not undermine sustainable principles. Notwithstanding the Arup Study's conclusion that employment sites need to be protected *for their designated purpose*, which was generally B class business uses only, we conclude that to protect employment land *solely* for uses within the B use classes is no longer appropriate or consistent with the direction of travel in national policy. This is because the broader definition of economic development in PPS4 supports other job-creating or wealth generating uses other than just those in the B class where those uses are not regarded as main town centre uses. Since many employment areas within Norwich have relatively good accessibility but are often poorly related to district and local centres and their services it is important that the uses and activities which are better located in or adjacent to centres should not take up scarce employment land.
61. Policy DM16 is clear that the first priority for the designated employment areas is to support their economic potential by encouraging business uses and other compatible employment generating development which can be reasonably accommodated in such areas without compromising their function. The supporting text of the DM Policies DPD states that *"Examples of uses that may be considered appropriate within designated employment areas include bus depots, car showrooms, waste uses and training facilities connected with existing businesses. Proposals for trade retail units will be determined on a case by case basis with consideration being given to the character of the operation"*.

¹⁴ See above para 20.

62. In recent years Norwich has been particularly successful in defending its employment land from inappropriate development of retail, community and other town centre uses. Examples include:

- Application 06/00024/F Change of use from light industry (Class B1) to taxi office (Sui Generis) at 17 Telford Close. Refused 10 March 2006.
- Application 07/00056/O Outline application for the erection of hotel and bowling alley at 10 Barnard Road, Norwich. Refused 30 April 2007; appeal dismissed 20 April 2009
- Application 07/00472/F. Redevelopment of the Gei Autowrappers site to provide a non-food retail warehouse (A1) and 3 no. industrial units (B1, B2 and B8) together with access and servicing arrangements and landscaping at 73 Whiffler Road Norwich. Refused 31 July 2008; appeal withdrawn.
- Application 08/00585/F: Change of use to church meeting hall with kitchen, toilets, meeting rooms including external alterations and provision of bicycle rack at 3 Delta Close, Norwich. Refused 21 October 2008.
- Application 10/01767/U: Change of use from business (class B1) to physiotherapy consulting rooms with rehabilitation gym (class D1).at Goodwin House, 9 Mason Road Norwich. Refused 8 December 2010.
- Application 11/00272/F: Change of use from warehousing (Class B8) to indoor children's play centre (Class D2) at 14-15 Francis Way, Norwich. Refused 19 April 2011. Failure to take this approach would be likely to lead to further pressure to disperse town centre uses unsustainably to employment areas. This would tend to undermine the policies of the Joint Core Strategy seeking to support and attract appropriate and accessible services to defined centres and to minimise unsustainable travel and the overarching principles of PPS4 (and the emerging NPPF) requiring local authorities to promote the vitality and viability of town centres.

63. Consequently although there is additional flexibility in Policy DM16 to accept forms of development outside the B use class where they are appropriate to the character and function of the area, it requires that any proposals for main town centre uses (as defined in the supporting text) should be subject to the PPS4 sequential test and impact assessment to ensure that no more sequentially suitable sites are available or suitable and that town centre uses should continue to be directed to centres as a first priority. We consider that the approach of this policy strikes an appropriate balance between the flexibility sought by PPS4 and the strategic priorities to protect existing employment areas and ensure a suitable supply of land for future employment growth set out in the Joint Core Strategy.

64. It is noted that the draft NPPF dispenses with the concept of “main town centre uses” and proposes that sequential and impact assessments should

only be required in the case of retail and leisure development. Should this proposal be retained it may be necessary to define explicitly in policy DM16 (rather than in the supporting text) which uses other than retail and leisure development would and would not be acceptable in order to avoid potential dispersal to employment areas of uses more appropriate in centres.

Protection of land and premises for small businesses – Policy DM17

Section to be completed with input from Economic Development and Asset Management, additional evidence (if available) describing the present and likely future demand for small business space and the need to ensure an appropriate and accessible supply of premises both in the city centre and in neighbourhoods.

Protection of a supply of suitable office premises and promotion of new office development within the city centre – Policy DM19

Section in preparation, discussion of total office floorspace offer, preponderance of dated and obsolete/unsuitable premises, deficiencies in supply and particularly in quality of office floorspace, examples of instances where offices are unlikely to be viable for retention and alternative uses accepted where there would be wider planning benefits to the centre:

- *Temple House, St Vedast Street and 90 St Faiths Lane (Hotel)*
- *St Andrews House, St Andrews Street and Horsefair House, St Faiths Lane (educational use)*
- *9-11 Upper King Street (bar use, reuse of long term vacant listed building)*

Will highlight initiatives to upgrade and expand existing office buildings where appropriate to do so (e.g. Yare House, 60 Thorpe Road); consented office development at Dukes Court, Duke Street and Whitefriars, further potential at Anglia Square phase 2 to support new retail development.

Potential of south-east sector of city centre to accommodate major new office development based around Rose Lane/Mountergate and within St Stephens Masterplan area as a basis for area wide regeneration. Potential threats to office development strategy posed by the NPPF which would remove offices from the definition of town centre uses and the obligation on potential office developers to justify an out-of-centre location: possible remedies to retain existing and attract new office development when market recovers.

Conclusions

65. Notwithstanding the reduced level of take-up in very recent years we conclude that the overall emphasis on economic growth and new employment development in the Norwich area should be maintained and there is no particularly strong case for further relaxing the policy approach to employment development. Employment land provision in the site allocations DPD and DM policies plan will ensure a sufficiency of supply and choice of sites to support the economy in the long term.
66. We consider that there is no particular evidence pointing to the cumulative loss of employment land: sites which have been reallocated for other purposes will in general retain employment as part of a mix of uses and can secure wider regeneration benefits. In cases where development has been approved on employment areas contrary to the local plan (e.g. the Bus Depot site at Vulcan Road) the uses proposed would now be supported by the wider definition of economic development now embodied in PPS4 and the emerging NPPF. This for example, will support the economy by providing jobs and supporting the aims of a more sustainable transport network.

Jonathan Bunting
10 October 2011

Draft Open Space, Sport and Recreation 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 early - mid 2012, and will be submitted to the Secretary of State for public examination later in 2012. 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 open space, sport and recreation (referred to as open space below) topic paper provides information about the way that open space policies in the Development Management DPD and open space requirement on allocations in the Site Allocations DPD have been developed, and how they respond to national planning guidance and the emerging National Planning Policy Framework.

2. Open Space, Sport and Recreation 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) 17 – "Planning for Open Space, Sport and Recreation," published in 2002. This states that "local authorities should undertake robust assessments of the existing and future needs of their communities for open space facilities" and sets out guidance for local policies on open space to serve new developments, including the establishment of local open space standards to guide those policies. It also covers the protection of existing open spaces and their enhancement through planning obligations.
- 2.2 The companion guide to PPG17 recommends a strategic approach and sets out ways that local authorities can undertake assessments and audits of open space. Included in its guiding principles for assessment is the need to define the 'extent to which open spaces meet clearly identified local needs and the wider benefits they generate for people, wildlife, biodiversity and the wider environment'. This includes undertaking audits on the quality, quantity and accessibility of existing open spaces to establish needs, assess whether any open space is surplus and to inform the local open space standards required through policy.
- 2.3 Other planning policy statements are also relevant to open space policy:
 - The supplement to PPS1: Planning and Climate Change, 2007 sets out how the spatial planning system should contribute to tackling climate change. It recognises 'the contribution to be made from existing and new opportunities for open space and green infrastructure to urban cooling, sustainable drainage systems, and conserving and enhancing biodiversity'.
 - PPS9: Biodiversity and Geological Conservation, 2005 promotes a strategic approach to the conservation, enhancement and restoration of biodiversity and geology through the creation of habitat networks.
 - PPS25: Planning and Flood Risk, 2006 highlights the important role that open space can play in flood storage.

- PPS5 requires development to have no adverse affect on the character of historic parks and gardens.

Emerging national policy

2.4 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 Bill (which includes the abolition of Regional Spatial Strategies).

2.5 It requires local planning policies to:

- identify specific needs and quantitative or qualitative deficits or surpluses of open space;
- set locally derived standards for open space;
- protect and enhance rights of way and access.

2.6 It also states that existing open space, buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the need for and benefits of the development clearly outweigh the loss.

2.7 The draft NPPF also creates a new designation of Local Green Space enabling local communities through local and neighbourhood plans to identify green areas of particular importance for special protection if they are not already identified as open space.

Regional Policy

2.8 RSS14's main focus is on the promotion strategic green infrastructure, protecting and enhancing existing open spaces in urban areas and creating habitat and leisure links to surrounding areas.

2.9 Policy ENV1 promotes the identification, creation, protection, enhancement and management of areas and networks of green infrastructure. This green infrastructure should promote health and biodiversity, help to achieve carbon neutral development and reduce flood risk. It requires local development documents to establish a hierarchy of green infrastructure and for connected networks to be created in urban areas, linking to the urban fringe and open countryside. It identifies the Broads as a regional green infrastructure asset.

2.10 Policy SS1 requires leisure opportunities to support new communities and ENV7 requires new development to address public health issues. Policy NR1 for Norwich promotes improved links to the Broads and other countryside around Norwich for residents and visitors.

Joint Core Strategy

2.11 The plan's vision states "there will be excellent public open space, sport and recreational facilities and community centres". Objective 9 states "Development must provide environmental gains through green infrastructure, including allotments and community gardens". Objective 11 states "the accessibility of open space, the countryside, sports and recreational facilities will be improved".

2.12 To fulfil national and regional policy requirements and to implement the plan's vision and objectives, JCS policy 1 requires development and investment to expand and link open space

and areas of biodiversity importance to create green networks. This network should be multi-functional. Open space should be included as an integral part of development and contributions should be made for off site green infrastructure and its maintenance.

- 2.13 Based on the findings of the Green Infrastructure Study (2007), an accompanying map to policy 1 sets out the green infrastructure network for Norwich, Broadland and South Norfolk. There are two sub regional green infrastructure corridors within Norwich itself, the Yare and the Wensum valleys (including the Yare Valley Walk, the Riverside Walk and the Marriot's Way). It also identifies a local green infrastructure corridor in east Norwich, from the Yare Valley, along the wooded ridge through Lion Wood and Mousehold, linking to a sub regional corridor to the north-east (see appendix 1).
- 2.14 The Green Infrastructure Delivery Plan also identifies more detailed green corridors within the urban area. These are available in figure 16 at <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/Fig%2015-17.pdf>>
- 2.15 City centre policy 11 includes the relevant green links from the delivery plan for the city centre, as well as improved public realm links (see appendix 2). The policy requires improvements to be made to the public realm and open space, green linkages and connections between open spaces, linking to the river corridor and the open countryside.
- 2.16 Policy 12 covers the rest of the city. It requires green links to be protected, maintained and enhanced. It supports the completion of the riverside walks and their extension into the countryside (particularly to Whitlingham and a possible new country park at Bawburgh Lakes). It also requires the establishment of a comprehensive walking and cycling network and increased tree planting. The plan requirement for all housing developments of 10 dwellings or more to have a "Building for Life" design assessment will help to ensure that open space and links form an integral part of new housing development.
- 2.17 Policy 8 covers leisure facilities. It requires development to provide for leisure activities, including new or improved built facilities to include green space, formal recreation, country parks and performance space. Policy 7, "Supporting communities" requires community halls to support new development.
- 2.18 The Implementation policy (Policy 20) sets out infrastructure essential to secure sustainable development. This includes:
- open space and green infrastructure, including habitat creation, pedestrian and cycle links, allotments, recreation facilities, parks, trees, hedgerows, woodland and landscaping;
 - community facilities.
- 2.19 Appendix 7 of the strategy includes projects to support the development set out in the JCS. Green infrastructure projects, based on the Green Infrastructure Delivery Plan, includes a project for the retention and re-creation of Mousehold Heath, with improved links to the surrounding countryside (estimated delivery 2026).

Local Policies

Existing policies

2.20 Current policies for open space sport and recreation are set out in the Replacement Local Plan (adopted 2004) and are supported by Supplementary Planning Documents on Open Space and Play and on Green Links and Riverside Walks. They aim to:

- Provide standards for open space to support new development based on dividing the city into 19 “Open Space sectors” (SR1 and 2);
- Protect existing open space and sports and recreational facilities from development unless alternative facilities of equal or better value are provided or there would be no overriding amenity or biodiversity loss resulting from redevelopment (SR3);
- Ensure major new development provides on- site open space or funding for off-site provision nearby (SR4) and for children’s play space (SR7);
- Allocate new sites for opens space, mainly on larger housing sites. Some of these are now in place, (e.g. Old Bowthorpe Park and Bowthorpe Southern park). Others, e.g. Eaton Civil Service Sports Ground, will be delivered through forthcoming development. In some cases, such as Lakenham Common and Hobrough Lane (king Street), facilities have not yet been delivered due to site specific issues. (SR5);
- Promote dual use of open space (SR6);
- Protect historic parks (SR8) and allotments (SR9);
- Enhance the network of green links and riverside walks (SR11 and 12);
- Provide design and locational policy for new sports and recreational facilities (SR13 and 14).

2.21 The policy approach for off site provision of open space and play space and its SPD use “Open Space Sectors” to identify local facilities on which section 106 from developers money is required to meet shortages in quantity, quality or accessibility of a particular type of open space within each sector. This approach reflects the requirement that section 106 money must currently be spent on facilities that are directly related to the specific development they serve and therefore must be spent locally.

Emerging Policies

2.22 Emerging policies in the draft Development Management DPD:

- Are streamlined in comparison with Local Plan policy;
- Comply with more recent higher level regional and JCS policy;
- Take account of recent evidence and the forthcoming introduction of CIL.

2.23 Draft Policy DM8 includes policies for the protection of existing open spaces and the provision of new open space. It requires:

- protection of existing open spaces, including allotments, from inappropriate development.
- all new developments to contribute to improvements to existing open space through CIL payments.

- new developments including over 100 child bed spaces to provide on-site play space (based on the findings of the needs assessment that there is a shortage of play space throughout the city – see evidence base below).
- new developments of over 4 hectares to provide other forms of open space as appropriate to the individual site as an integral part of development. The policy does not set out a minimum proportion of the development site that should be open space.

2.24 Policy DM22 covers the provision, enhancement and protection of community facilities, which include indoor sports facilities. The policy requires proof that such facilities are economically unviable and evidence of marketing before redevelopment can be considered.

2.25 Emerging policy is less constrained as the Community Infrastructure Levy (CIL) will shortly replace section 106 funding for off-site open space provision. CIL finances can be spent on any location within the city, removing the current requirement with section 106 that money should only be spent on facilities close to the development providing the finance. This enables a more strategic rather than a reactive approach to spending funds.

2.26 An Open Space Strategy, an early draft of which exists but was not progressed to adoption due to funding cuts, would play a vital role in providing the overall co-ordination to ensure that CIL funding is spent in the most appropriate manner to achieve the strategic aims set out in the JCS.

2.27 Larger new development considered for allocation through the Site Allocation Plan would, if implemented, provide new open spaces e.g. Rose Lane/Mountergate, St Anne's Wharf and Three Score.

3. The local evidence base

3.1 As well as the Green Infrastructure Study and Delivery Plan commissioned to support the Joint Core Strategy, local policies have been informed by other evidence studies.

3.2 An Open Spaces Needs Assessment was produced in 2007 to assess and audit the quantity and quality of the existing provision. This was completed in line with the requirements of "Planning Policy Guidance 17: Planning for Open Space Sport and Recreation" (PPG17), and following the methodology set out in "Assessing Needs and Opportunities: A Companion Guide to PPG17". Detail on this assessment is below.

3.3 In 2008/09 an 'Urban Green Grid for Norwich', funded by the Greater Norwich Development Partnership, identified areas with potential as green space opportunities, perhaps as pocket parks or to connect other green spaces. These are spaces not designated in any other way, which can be assessed, when funding becomes available locally, for their value to provide 'on the doorstep' spaces or to be managed as green corridor connections to the Greater Norwich area. The findings of this study informed the draft work on the Open Space Strategy.

The Open Space Needs Assessment

3.4 In line with the requirement of PPG 17, an Open Space Needs Assessment, including extensive consultation and an audit of the quality, quantity and accessibility of all open spaces in the city, has been carried out. The study describes overall provision and distribution of open space and other community facilities within the city. The full assessment is available at:

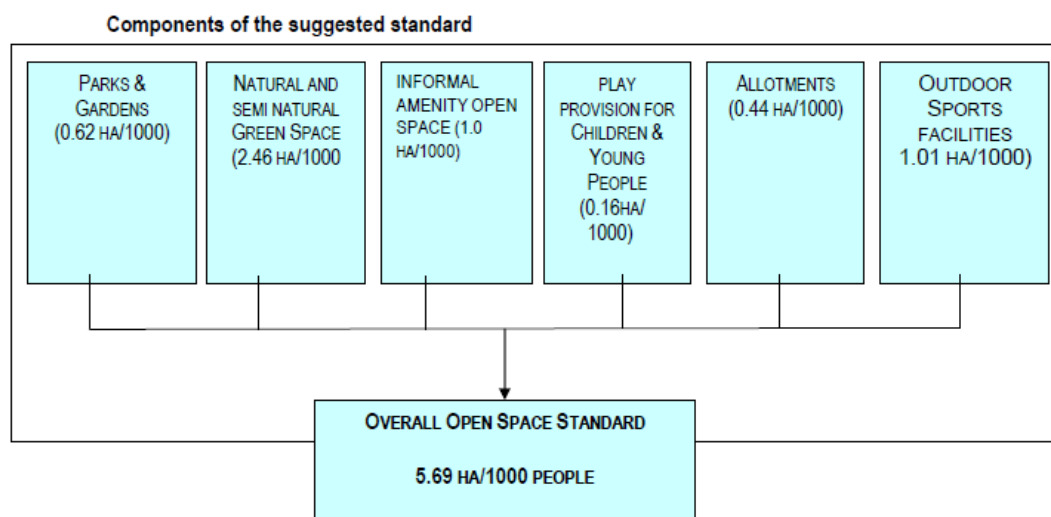
<http://www.norwich.gov.uk/Planning/Documents/Env02a.pdf>

- 3.5 The results of this study have enabled the council to defend open space and target section 106 funding to address local needs more effectively.
- 3.6 Dividing the city into 4 areas, West (Bowthorpe, Wensum, University), North (Catton Grove, Mile Cross, Sewell), East (Mancroft, Thorpe Hamlet, Crome) and South (Lakenham, Town Close, Eaton), area profiles are given. These provide more detailed consideration of the adequacy of provision of open space based on the defined areas. The detailed findings by area are available at: <http://www.norwich.gov.uk/Planning/Documents/Env02b.pdf>
- 3.7 The assessment classified types of open spaces within Norwich by their primary purpose, whilst recognising that many open spaces are multi functional.
- 3.8 The study identified shortages of open space , both in terms of different types of open space and where and what type. Standards were proposed for different types of open space for quantity, quality and accessibility to inform policy making.
- 3.9 In line with PPG17, open spaces were assessed using the following typology:

Types of Open Space

- Parks and Gardens
 - Natural and Semi-natural Urban Green Space
 - Open Space Corridors
 - Informal Amenity Open Space (including civic space and cemeteries and churchyards)
 - Formal Outdoor Recreation
 - Provision for Children and Young People
 - Allotments
 - Indoor facilities
 - Accessible Countryside in the Urban Fringe
- 3.10 Tables summarising the recommended city wide quantity and accessibility standards are below. These are followed by an account, with summary tables, of how these standards were met by type of open space within Norwich as of 2007. Where major new facilities have been provided since 2007, these have been incorporated.
- 3.11 Further detail is in appendix 3, including information on sub-areas of the city and recommendations in relation to planning and wider policy where applicable.

Quantity



Accessibility

A summary of the access standards for each typology is shown below (these are straight line distances):

PARKS & GARDENS	NATURAL AND SEMI NATURAL GREEN SPACE	INFORMAL AMENITY OPEN SPACE	PLAY PROVISION FOR CHILDREN & YOUNG PEOPLE	ALLOTMENTS	OUTDOOR SPORTS FACILITIES
DISTRICT/ LOCAL PARKS: 900M	600M	100M	PRE-TEEN: 240M	600M	3000M
POCKET PARKS: 600M			TEEN: 720M		

Overview of Needs Assessment Findings

3.12 Parks and gardens - existing provision for parks and gardens equates with the recommended standard. The 81 hectares in the city provide 0.62 ha per 1000 population. There are few parts of the City that are not within easy reach of a major park, such as Eaton Park, Sloughbottom Park, Woodrow Pilling Park or Chapelfield Gardens. There is also a good network of Local and Pocket Parks. For some it may be necessary to use a vehicle to access a district park, unless cycle routes can be improved, which would further negate the need to use cars. Generally parks and gardens are of a good quality, with a consistency around the middle scores, and no facilities were rated at the extremes. A number of parks have benefitted from significant improvements in recent years, funded by lottery money, other grants and section 106 money e.g. Eaton Park, Wensum Park, Waterloo Park and Sewell Park. Summary:

Quantity	✓
Quality	✓
Accessibility	✓

3.13 Natural green space - The total area of natural and semi natural green space is about 430 ha, of which 293 ha are in public ownership and a further 137 ha in private ownership, but with potential public access. "Public land" is the equivalent of 2.24ha per 1000 population, with an overall ratio of 3.29 ha per 1000 population. This very high proportion of natural and semi-

natural green space for an urban area results largely from the fact that Mousehold Heath and extensive areas of river valley are within the city boundary. Natural green space quality scores are the worst for any type of open space in Norwich. Whilst many spaces, particularly in the river valleys, are of very high quality (e.g. Marston Marsh, Mile Cross Marsh), overall scores are low as many sites in or close to housing and industrial areas, such as tree belts, were badly littered and maintained. Summary:

Quantity	✓
Quality	✗ (though some very good)
Accessibility	✓

3.14 Open space corridors - The green corridor network in Norwich is primarily concentrated on routes following the two main rivers, the Yare and Wensum, together with linear routes along disused railway lines such as Marriott's Way and Lakenham Way. These links are important in joining existing areas of open space in the city with the surrounding countryside, but the network is relatively limited at present. While by definition primarily linear in nature, existing provision of green corridors in Norwich is about 29 ha or the equivalent of 0.22 ha/1000 population. Two thirds of green corridors scored at least 70% signifying a generally high quality. Summary:

Quantity	Limited, but developing
Quality	✓
Accessibility	Limited, but developing

3.15 Informal amenity open space - There are about 58 ha (0.44 ha per 1000) of informal amenity open space in public ownership within the city, and an additional 62 ha (0.48 ha per 1000) in private ownership, but with potential for public access. Overall this equates to 0.92 ha per 1000 population. In addition there are about 46 ha of churchyards and cemeteries, the equivalent of 0.35 ha per 1000 population. Overall current provision therefore stands at about 1.27 ha per 1000 population, well above the established standard. In terms of quality, overall two thirds of sites scored higher than 60% and the average figure is above that for all types of open space in Norwich. Summary:

Quantity	✓
Quality	✓
Accessibility	✓

3.16 Play provision for children and young people - In total children's play facilities occupy an area of 12.77 hectares (0.1 has/1000 population) and teenagers' facilities 3.17 hectares (0.02 ha/1000), giving a total for overall play provision for children and young people of 15.94 ha or 0.12 has per 1000 population, compared to a standard of 0.16. The quality of provision for children's and teenagers' play is the best of any category. Summary:

Quantity	✗
Quality	✓
Accessibility	✓

3.17 Allotments - The total number of allotment plots available in these sites in mid June 2007 was 1484. There are a total of 43 hectares of allotment space in the city managed by either the Council or a local allotments society, which works out at 0.33 ha per 1000 people, compared to the standard of 0.44. Allotments were generally clean with good entrances and boundaries. Disabled access and signage were considered poor. Summary:

Quantity	✗
Quality	✓

3.18 **Outdoor sports facilities** – there is a significant shortage of about 80 ha of outdoor sports space in the city. The options for future provision include:

- new facility provision in the city (where feasible),
- more intensive use of parks and other open spaces which were formerly used for sport,
- use of school sites
- use of facilities in the wider Norwich area.

Recent provision of further high quality synthetic turf pitches at UEA and at the Goals centre on Hall Road has helped to reduce the shortage of facilities, whilst the improved athletics facilities at UEA meet needs. Summary:

Quantity	✗
Quality	✓
Accessibility	✓

Indoor facilities

3.19 This section summarises shortages of indoor sports facilities based on the Needs Assessment's findings and sets out its major recommendations. More recent research undertaken by Sport England will be verbally reported to members if available.

3.20 **Sports halls** – there is a shortage of 8 sports halls in community use in Norwich, which should be addressed by improvements to community access to school halls at Heartsease, Notre Dame, CNS and possibly the private school facilities at Norwich HS and Norwich School (dependent on school requirements), improved community usage of new smaller 3 court halls and Recreation Road and Catton Grove Primary School or new facility provision in those areas currently outside reasonable walking catchments including Hewett School, Bowthorpe and the Mile Cross area.

3.21 **Swimming pools** – there is a shortage of 2 pools in community use in Norwich, which should be remedied by improvements to community access to school pools at Heartsease and the smaller pools elsewhere on junior school sites (dependent on school requirements), or new facility provision in those areas currently outside reasonable walking catchments, and in particular the Mile Cross area.

3.22 **Health and fitness** – there is a shortage of 5 health and fitness centres in Norwich, which should be addressed by new facility provision in those areas currently outside reasonable walking catchments, and in particular Heartsease, Eaton and west of the city centre. Much of the existing provision is private and available only through membership, and additional facilities should be provided ideally for community access on a pay and use basis.

3.23 **Indoor bowls** – there is a shortage of 3 rinks in Norwich, which could be remedied by new facility provision, extensions where possible to existing centres or reliance on existing provision in the wider Norwich area.

3.24 **Indoor tennis** – there is a shortage of 6/9 courts in the Norwich area, the options for which are new facility provision in the city, particularly where this is accessible to people in the south and west of Norwich or extensions where possible to existing centres.

3.25 **Community Centres** - the current number of community centres matches the recommended standard. However, whilst there is quite good spatial coverage of the City by existing venues, some areas are not well served. New facilities in these locations would improve the accessibility

of local residents throughout the city to small community halls for a variety of purposes, and should be provided as the city develops and population increases.

4. Open space monitoring

Losses

- 4.1 The loss of open space to other uses is monitored through the Annual Monitoring Report. Indicator LP15 monitors the loss of open space, but does not count losses where they are permitted in policy as the sites are of low amenity or biodiversity value.
- 4.2 In the last 5 years there has been no loss of open space contrary to policy. Those open space which have been lost include:
- former bowling greens with no public accessibility and low biodiversity value at Plumstead Road, Ailwyn Hall and Browne Street;
 - redevelopment of inaccessible private open spaces of low biodiversity value at Taylors Lane and Lambert Road for housing (the former including provision of publically accessible recreational open space).
- 4.3 Scores from the Open Space Needs Assessment were taken account of in relevant decisions.

Gains

- 4.4 There have been major gains in the provision of open space in recent years through:
- Section 106 payments, sometimes used as match funding to lever in other external grants, improving the quality and accessibility of existing open space eg improvements to Gildencroft and Jenny Lind Parks, streetscape improvements to St. Georges Street, including major enhancement of the area outside the Playhouse and the adjoining St Georges Green open space.
 - On-site provision of new open space in larger developments e.g. The Loke and Crome Road provided 0.32 and 0.45 hectares of green space and play areas respectively; amenity open space has been provided at the former Norfolk and Norwich Hospital site; improvements to the riverside walk and a landscaped open space were provided at Appleyards Mill on Oak Street
 - Open Space developments e.g Goals development of synthetic turf pitches at Hall Road

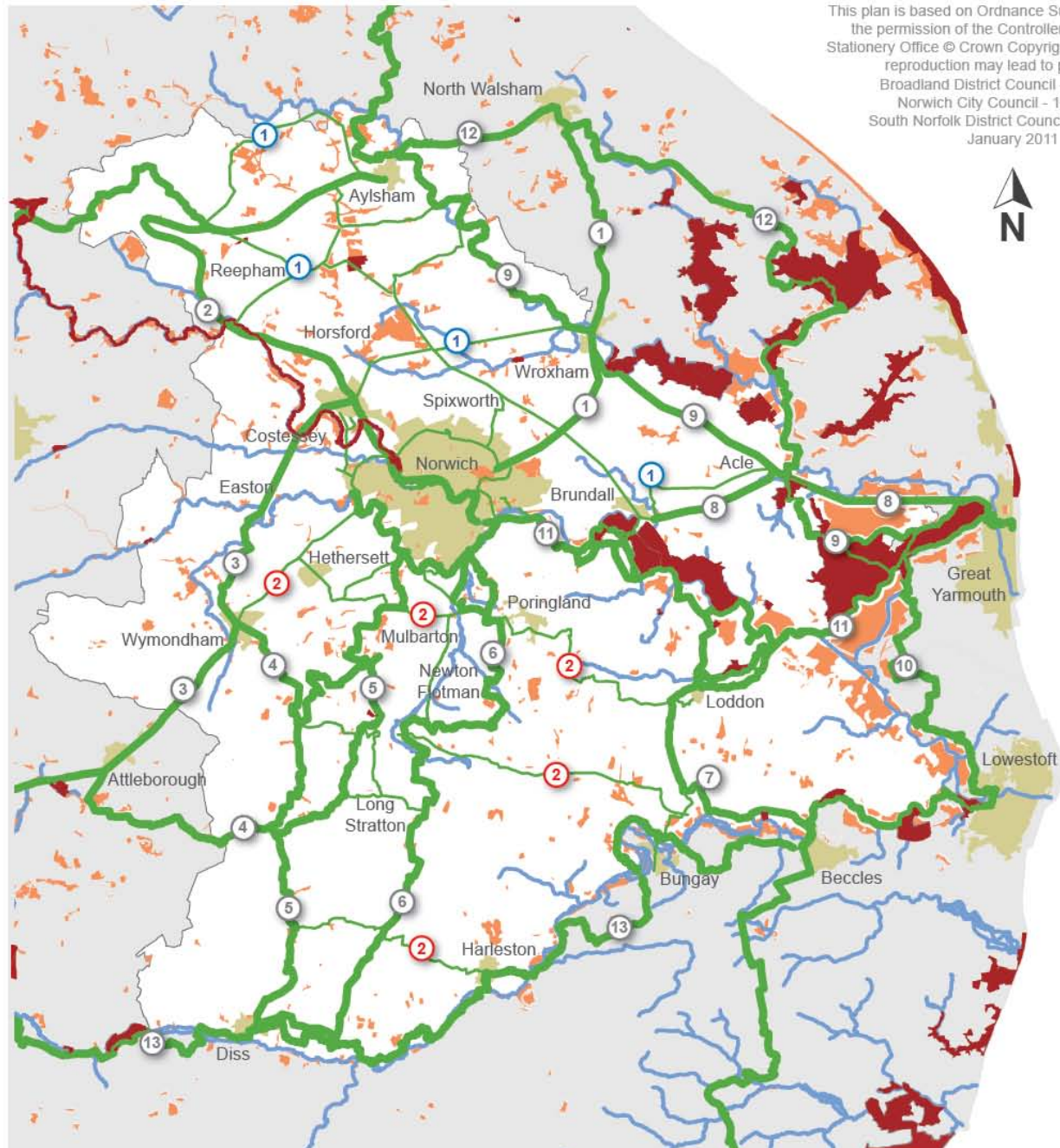
Appendix 1

Proposed Green Infrastructure Network for the Greater Norwich Area

Source: Greater Norwich Green Infrastructure Study 2007.

The Green Infrastructure opportunities on this map are indicative only. The map illustrates information about opportunities at a strategic level and does not indicate a constraint on development.

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Broadland District Council - 100022319
Norwich City Council - 100019747
South Norfolk District Council - 100019483
January 2011



- Local Green Infrastructure Corridors
- Sub-Regional Green Infrastructure Corridor
- Existing Main Urban Areas
- River Valleys & Wetlands
- Existing Green Infrastructure Sites
(Strategic Open Spaces & Core Biodiversity Areas, including Sites of Special Scientific Interest and County Wildlife Sites)
- European & International Designated Wildlife Sites

- ① North East Norwich - Wroxham - North Walsham Corridor
- ② Norwich - Reepham - Aylsham Corridor
- ③ North West Norwich - Wymondham - Attleborough - Thetford Corridor
- ④ South West Norwich - Wymondham - Attleborough Corridor
- ⑤ South Norwich - Mulbarton - Diss Corridor
- ⑥ South Norwich - East Diss Corridor
- ⑦ Loddon - Beccles - Lowestoft Corridor
- ⑧ East Norwich - Brundall - Acle - Great Yarmouth Corridor
- ⑨ Aylsham - Wroxham - Acle - Great Yarmouth Corridor
- ⑩ Great Yarmouth - Lowestoft Corridor
- ⑪ East Norwich - The Broads - Great Yarmouth Corridor
- ⑫ Acle - North Walsham - Aylsham - Cromer Corridor
- ⑬ Lowestoft - Beccles - Bungay - Harleston - Diss - Thetford Corridor
- ④ Northern Greater Norwich Area Green Infrastructure Corridor Network
- ② Southern Greater Norwich Area Green Infrastructure Corridor Network

Appendix 2

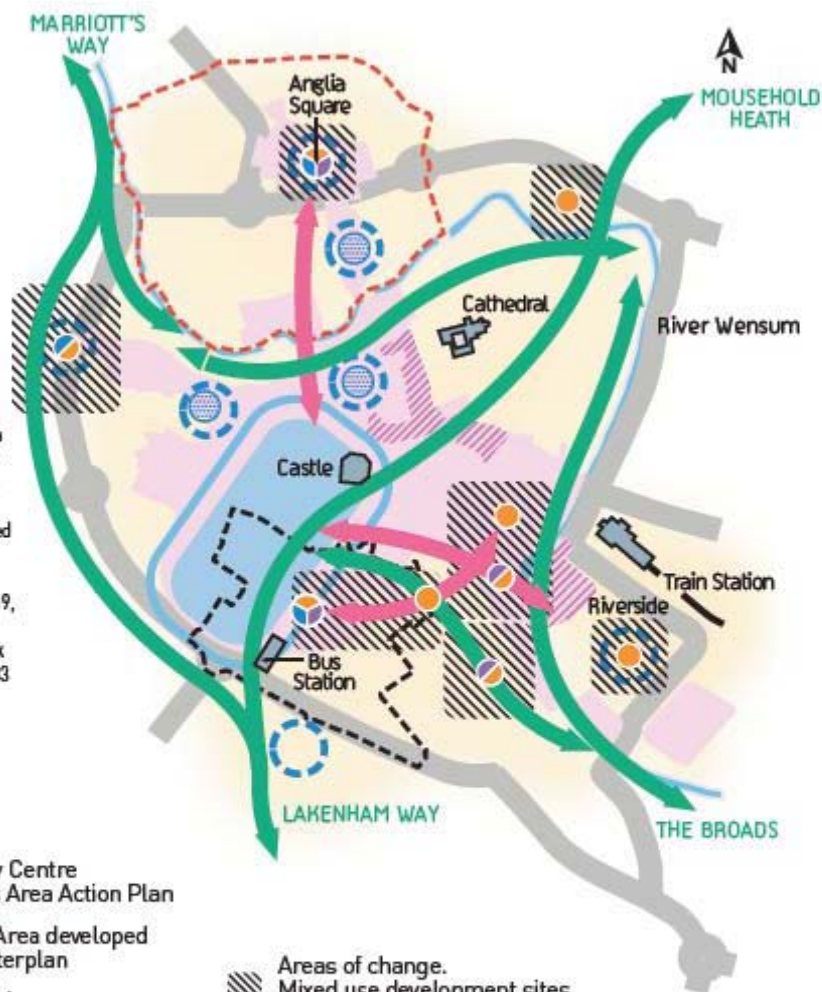
Norwich City Centre key diagram

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September 2009

Key

- City Centre
- Northern City Centre Developed as Area Action Plan
- St Stephens Area developed through masterplan
- Main Leisure Areas
- Late Night Leisure Area
- Enhanced retail function. Expansion of Primary Retail Area
- Specialist shopping areas
- Other shopping areas
- Enhanced principal Green Links
- Improved Public Realm

- Areas of change. Mixed use development sites with improved public realm.
 - Main focus of change – residential
 - Main focus of change – commercial
 - Main focus of change – retail
 - Split focus of change
- NB. Range of transport initiatives in the City Centre



Appendix 3 Summary of Open Space Needs Assessment key findings and recommendations

1. Parks and public gardens

Quantity

The total area of open space in use as parks and gardens in the city is high, at 81 hectares. This is the equivalent of about 0.62 hectares per 1,000 population and is seen as an appropriate standard. This excludes land in parks that is allocated to a separate primary typology – if these are included, open space in parks and gardens totals about 135 hectares.

Quality and Accessibility

Generally parks, gardens and recreation grounds are of good quality. Quality assessments showed that most parks, gardens and recreation grounds gained average scores, with none rated at the extremes.

The assessment recommended the council could consider establishing a hierarchy of parks of different sizes and with different ranges of facilities and natural areas to increase quality. The hierarchy could be based on district parks for strategic uses eg Eaton Park and Local (e.g. Wensum Park) and Pocket Parks (e.g. Sewell Park) for more regular use (see table below for further detail).

Few parts of the city that are not within easy reach of a major park. These areas include parts of Eaton, Mancroft, Thorpe Hamlet and Crome wards. The situation in the city centre is likely to be worsened by planned further, generally high density, development.

The table below summarises the proposed standards and typical characteristics of different types of park:

Parks and public gardens			
Type and function	Approx size	Maximum distance from dwellings	Characteristics and Quality
District park - Provision that is strategically important in Norwich. Weekend and occasional visits mainly by foot but also by car	Over 20 hectares Example: Eaton Park	c 900 metres - 15 minutes walking time	<ul style="list-style-type: none">○ Landscape with a variety of natural and semi natural features, including natural habitats and planted beds.○ Space for outdoor pitch, other sports provision and changing rooms as appropriate.○ Space for children's and youth play facilities.○ Footpaths. Cycleways.○ Buildings for secured storage and for catering outlets.○ Due regard to external links by foot and bicycle which may require improvements to the external environment.○ Events venue. A notable and defining architectural feature. Car parking. Toilets Seating. Litter and dog bins.. Refreshment venues. Picnic tables. Consideration of zoning between active and passive zones.
Local parks - Primarily for pedestrian visits from local residents and workers	At least 2 hectares Example: Wensum Park	c 600 metres – 10 minutes walking time	<ul style="list-style-type: none">○ Landscape with a variety of natural features, including natural habitats○ Space for outdoor pitch, other sports provision and changing rooms as appropriate.○ Space for children's and youth play facilities.○ Footpaths. Cycleways.○ Buildings for secured storage and/or catering outlets (if appropriate)

			<ul style="list-style-type: none"> Due regard to external links by foot and bicycle which may require improvements to the external environment. <hr/> <ul style="list-style-type: none"> Car parking, Toilets, Seating, Litter and dog bins, Picnic tables.
Pocket parks - Pedestrian visits, especially by the elderly and parents with young children. Provision is important in areas of high density housing and employment	0.2 to 2 hectares Example Sewell Park	c 300 metres – 5 minutes walk	Seating areas, local play opportunities, planted beds, trees and paved areas.

Summary of findings and recommendations

- There is good overall provision of parks in Norwich and that these are generally well maintained and accessible.
- No parks are surplus to requirements.
- The main area identified as having a shortfall of formal parks is the city centre/ east of the city (Mancroft, Thorpe Hamlet, Crome) and the east of Eaton ward.
- Smaller/pocket parks within areas of dense development could increase access to park space, though any new park provision should be of an appropriate shape and character to allow for meaningful recreational use.
- Unused space in larger parks could be combined with provision for other open space, for example by reinstating former sports pitches or enlarging areas for biodiversity promotion , to provide truly multi-functional areas
- New standards for parks should include guidance on the improvement of approach routes by foot and bike
- A green spaces strategy should be developed which takes into account the need for formal parks and gardens as a whole, but also the need for formal space which binds together other types of open space on multi use parks

2. Natural and Semi-natural urban green spaces

Quantity

The total area of natural and semi natural green space is about 430 ha, of which 293 ha are in public ownership and a further 137 ha in private ownership, but with potential public access. These figures are far higher than most other cities, with “public land” providing the equivalent of 2.24ha per 1000 population and the overall figure being 3.28 hectares per 1,000 population. This is well above English Nature national suggested standard of 2 ha per 1000 population.

These high figures are the result of the existence of large semi-natural areas such as Mousehold Heath, the wooded ridges and the river valleys and a number of smaller areas, such as former chalk pits e.g Danby Woods.

Quality

The scores for natural green space quality are the worst for any type of open space in Norwich. There are a number of high quality natural spaces, particularly in the river valleys, such as Marston Marsh, Eaton Common and Mile Cross Marsh. However, overall scores are low as many sites in or close to housing and industrial areas, such as tree belts at Sweet Briar and Three Score and other spaces such as Bevan Close, were badly littered and maintained. Since the scoring was done, tree belts at Three Score have been tidied. Privately owned spaces were of varied quality.

Accessibility

Due to the high number of such sites in Norwich and the growing green corridor network, access to natural sites is good.

Summary table

Natural and semi-natural urban green spaces						
Quantity		Accessibility	Quality			
Ha per 1000 population		Recommended standard	Comparison to existing city wide average for all types of open space %		Area comparisons for amenity spaces %	
Current Provision	3.28	600 metres	Natural spaces	61.1	West	56.9
					North	57.6
Standard	2.46		City average	68.6	East	63.2
					South	66.9

Recommendations

- The focus should be initially on improving the quality of provision and accessibility within easy walking distance
- A rolling programme of facility improvements should be put in place, with an initial focus on littered spaces
- Management agreements should be negotiated with the owners of private green space to improve accessibility by the wider community and improve biodiversity

- Increased awareness should be made of the opportunities to use natural green space by promoting access on foot and by cycle, for example through improved signing, and the benefits of this to a healthy lifestyle
- Biodiversity should be improved through a system of action plans in conjunction with land owners and nature conservation organisations
- Sites of particular nature conservation interest should be protected

3. Open Space Corridors

Open Space Corridors are linear stretches of either land or water extending into the urban area, connecting with other open spaces and linking neighbourhoods with the countryside. They provide habitat corridors, sustainable transport links and visual amenity.

Quantity

The green corridor network in Norwich is primarily concentrated on routes following the two main rivers, the Yare and Wensum, together with linear routes along disused railway lines such as Marriott's Way and Lakenham Way.

While by definition primarily linear in nature and therefore not appropriate for a quantity standard, existing provision of green corridors in Norwich is about 29 ha or the equivalent of 0.22 ha/1000 population.

Quality

Scores varied between 84% and 49% (with an average of 70.1%). The Marriott's Way and parts of the Riverside Walk scored the highest scores.

Accessibility

These links are important in joining existing areas of open space in the city with the surrounding countryside, particularly the Marriott's Way, the Riverside Walk and the Lakenham Way, but the network is relatively limited at present.

Recommendations

- On-site provision should be made of green corridors in new development, linking to existing corridors and other green spaces as far as possible.
- Since green links are a major focus of JCS and government policy, significant focus should be placed identifying gaps, making connections and enhancing open space corridors within the city and linking out to the open countryside. The Green Infrastructure Study and Delivery Plan provide a framework for this.

4. Informal Amenity Open Space

Amenity open spaces are those open spaces used by the public which are not laid out for a specific function. They include areas such as informal grassed areas and kickabout areas with no formal facilities. The category also includes civic spaces, usually in the city centre, (though these were not assessed), as well as churchyards and cemeteries. Amenity space also includes areas in private ownership with no current private access. Highway verges and other small pieces of roadside space are not counted as amenity space.

Quantity

There are about 58 hectares of informal amenity open space in public ownership within the city, and an additional 62 hectares in private ownership, with potential for public access. This equates to 1.27 hectares per 1,000. The assessment recommends a lower standard of 1 hectare per 1,000.

Accessibility:

There are currently accessible amenity spaces in most parts of the city. The assessment recommends a standards distance of 100 metres (straightline), or about 1-2 minutes walking time as appropriate, as such spaces should be within easy reach of home for informal play and recreation opportunities. In areas of high density development, which may lack access to traditional private gardens, access to informal space and pocket parks is important.

Quality:

The quality of existing open spaces throughout the city is generally slightly above the average for all types of open space. Amenity open spaces in the west and north of the city are generally of poorer quality than those in the south and east.

Summary table:

Informal Amenity Open Space						
Quantity		Accessibility	Quality			
Ha per 1000 population		Recommended standard	Comparison to existing city wide average for all types of open space %		Area comparisons for amenity spaces %	
Current Provision	1.27	100 metres	Amenity spaces	69.2	West	66.4
Standard	1.00				North	66.1
			City average	68.6	East	71.5
					South	70.7

Civic spaces

Civic spaces are those areas where large groups of people can meet for events and gatherings associated with the civic role of the city or simply spend time. There is an extensive, and expanding, linked network of pedestrianised streets and civic spaces in the city centre including:

The Memorial Gardens
The Forum - Millennium plain
Gentleman's Walk
St Andrew's Plain
St George's Street and Green
The Lanes
Hay Hill

Proposals for new and improved civic spaces feature in the St Stephens Street Area Outline Masterplan (Oct 09) and the Northern City Centre Area Action Plan (Apr 10). The Streetscape

Design Manual (Sept 06)¹ contains policies that guide the City Council's approach to street design and maintenance in the city centre.

Churchyards and Cemeteries

As an historic city, Norwich has large numbers of churchyards and cemeteries. The 46 ha of churchyards and cemeteries provide the equivalent of 0.35 ha per 1000 population. They provide protected and managed places around the city for wildlife, and, particularly in the city centre, provide locally distinctive, historic open spaces, forming a key element of green infrastructure.

The quality assessments showed that the great majority of churchyard scores to be significantly higher than the average for open spaces, with city centre churches such as St Giles and St Michael at Plea scoring particularly highly.

Summary of findings and recommendations

- All important areas of informal open space should be retained and enhanced where necessary.
- Amenity spaces, where well managed, are important both for casual use and for landscaping, particularly in housing areas. Consultation, and the focus group meetings in particular, suggested that accessible informal space is the most valued type of open space for people in Norwich.
- Resident led projects (such as that in Knowland Grove in 2009) can be effective in improving and managing such spaces.
- There are also opportunities to make better use of the biodiversity potential of such areas, including strengthening green corridors as promoted by national and JCS policy.
- The nature of the space should be determined to reflect local circumstances. Informal green space can provide an extremely valuable play resource to complement equipped provision. The shape and size of space provided should allow for meaningful and safe recreation. Attention in design of new spaces to planting, topography and safety/security will maximise its potential.
- Amenity open spaces with no public access are a substantial resource with considerable potential.
- There is scope for further development of civic space, particularly in the city centre and local shopping centres.
- Some informal amenity open space which has a low value and can not practically be improved (e.g. due to its shape or location) could be considered for redevelopment or re-use as it is expensive to maintain and can be a liability and source of nuisance.

5. Formal Outdoor Recreation

Quantity

¹ http://www.norwich.gov.uk/intranet_docs/A-Z/Regeneration/Streetscape_Design_Manual_Final_Version_Sept_06.pdf

The Needs Assessment identified that there are 97 ha of sports grounds in Norwich, the equivalent of 0.74 ha per 1000 population.

Of the 242 pitches, courts and greens in total only half (121) are in community use. It identified that there were also 6 floodlit synthetic turf pitches in the area, which cater for more specific usage, mainly for hockey and football. Since the assessment was completed, 10 new artificial grass football pitches and 2 hockey pitches have been opened at the Goals centre on Hall Road, with community access. Voluntary sports clubs provide tennis, rugby, football and bowls facilities. The private sector provides a range of facilities for golf, cricket, tennis and football.

In addition, some sports grounds outside the city boundaries, such as UEA sports pitches, are accessible to city residents.

Quality

The quality of existing outdoor recreation facilities throughout the city is quite high, scores being well above the average for all types of open space. Facilities in the east of the city are generally of poorer quality than those elsewhere.

Accessibility

Public consultation suggests a slightly greater expectation for using a car to get to formal playing fields although the most popular trip mode is by foot. 70% of the respondents would be prepared to travel somewhere up to 15 minutes to access such facilities. Clubs are known to draw on membership from farther afield, and it may sometimes not be possible to provide playing pitches within easy walking distance. A distance of no more than 3 kilometres is therefore the proposed standard.

Summary table:

Formal Outdoor recreation						
Quantity		Accessibility	Quality			
Ha per 1000 population		Recommended standard	Comparison to existing city wide average for all types of open space %		Area comparisons for amenity spaces %	
Current Provision	0.74	3000 metres	Outdoor recreation	73.1	West	77
Standard	1.01		City average	68.6	North	76.4
					East	68.7
					South	71.8

Summary of findings and recommendations

- Shared use of facilities should be promoted, where possible (as in the recent case of the Goals development), through planning agreements. Synthetic surfaces offer the opportunity to enable facilities to be used much more intensively.
- The reinstatement of sports pitches on existing parks would be the most practical means of meeting the shortfall in provision.

- Continued use of sports pitches just outside city

6. Provision for children and young people

Formal leisure facility provision for children and young people in the city includes small children's play areas and multi-use games areas (MUGAs) - containing facilities for basketball, football and cricket, skateboard parks, teenage shelters and informal kick-about areas.

Informal play is equally important and children use all kinds of open spaces, in addition to formally equipped play areas, for their games and social interaction.

Quantity

Within the city there are 15 MUGAs; 2 cycle speedways; two BMX sites and six skateboarding sites, including the recently improved major facility at Eaton Park.

In total children's play facilities occupy an area of 12.77 has (0.1 hectares per 1000 population) and teenagers' facilities 3.17 hectares (0.02 hectares per 1000), giving a total for overall play provision for children and young people of 15.94 hectares or 0.12 hectares per 1000 population.

This is below the recommended local standard for play 0.16 ha per 1000 population for equipped space.

Provision for children and young people						
Quantity		Accessibility	Quality			
Ha per 1000 population		Recommended standard	Comparison to existing city wide average for all types of open space %		Area comparisons for play spaces %	
Current Provision	0.12	Pre-teen 240 metres Teen 720 metres	Play	77.3	West	74
					North	77.5
Standard	0.16		City average	68.6	East	80.1
					South	79.8

3 types of play provision are sought through development:

Type A: 'doorstep' spaces and facilities for play and informal recreation.

This is a small open space within sight of home, where children, especially younger children, can play within the view of known adults. This could be a grassed area, a paved open space, a residential street in a homezone or a small designed play area, which is large enough to enable young children to play within sight of known adults.

Type B: 'local' spaces and facilities for play and informal recreation.

A larger space which can be reached safely by children beginning to travel independently and with friends, without accompanying adults and for adults with young children to walk to with ease.

This could be a grassed area, a small park, a local open space, a designed space for play or informal recreation or a school playground open out of school hours, which is attractive to children as they begin to move around their neighbourhoods without being accompanied by adults.

Type C: 'neighbourhood' spaces and facilities for play and informal recreation.

A larger space or facility for informal recreation which children and young people, used to travelling longer distances independently and can reach safely.

7. Allotments

Quantity

Norwich has over 1,484 allotment plots on 17 sites, totalling about 43 hectares of allotment space managed either by the green spaces team or by a local allotments society.

A requirement for the provision of a total of 2000 plots in the city was considered reasonable, representing an increase of 500 plots or about 33%.

There is a shortfall of provision in the city centre, the east of the city and in northern parts of Lakenham and Town Close.

Quality assessment

Scores varied between 83% and 57%, with an average of 69.0%, slightly above the average for all types of open space. Three quarters of allotments scored better than 60%. The northern sub-area scored lowest on quality.

Allotments are generally clean with good entrances and boundaries and there are water standpipes on all allotment sites.

Accessibility

The sites are, on the whole, well used by a small section of the population. However disabled access and signage were considered poor.

Summary

Allotments						
Quantity		Accessibility	Quality			
Ha per 1000 population		Recommended standard	Comparison to existing city wide average for all types of open space %		Area comparisons for amenity spaces %	
Current Provision	0.33	600 metres	Allotments	68.3	West	68.3
					North	66.8

Standard	0.44		City average	68.6	East	73.3
					South	68.6

Recommendations

Increase the number of allotments in accessible locations to meet growing demand.

8. Indoor Sports facilities

The Greater Norwich Infrastructure Needs and Funding Study concluded Norwich needs:

A 4 lane 25 metre swimming pool by 2021

A 4 court indoor sports facility by 2021 and a further 4 court facility by 2031

Needs assessment findings summary:

Category	Quantity Standard	Access standard	Provision (2007) in community use	Requirement	Shortfall	Recommendations
Sports Halls	One 4 court hall per for community use per 12,000 people	20 minute trip	3 halls	11 halls	8 halls	<ul style="list-style-type: none"> Improved community use of schools facilities New provision (particularly at Hewett School, Bowthorpe and Mile Cross)
Swimming pools	One 4 lane 25 metre pool for community use per 18,000 people	20 minute trip	5 pools	7 pools	2 pools	<ul style="list-style-type: none"> Community access to school pools at Heartsease and junior schools New pool (particularly at and Mile Cross)
Health and Fitness	One 50 station centre per 8,300 people	20 minute trip	11 centres	16 centres	5 centres	New centres with community access in particular in Heartsease, Eaton and west of the city centre.
Indoor Bowls	One 6-rink indoor bowls centre per 55,000 people	20 minute trip	11 rinks	14 rinks	3 rinks	<ul style="list-style-type: none"> New facility provision Extensions where possible to existing centres Reliance on existing provision in the wider Norwich area.
Indoor tennis	One 4-court indoor tennis centre per 57,000 people	20 minute trip	0 courts	9 courts	9 courts	<ul style="list-style-type: none"> New facility in south and west Extensions to existing centres near Norwich

Community buildings and small halls	A community venue per 8200 people	15-minute walk time	16 halls	16 halls	0 halls	New facilities in areas of shortage (Thorpe Hamlet, Sewell, Mancroft, Catton Grove. Eaton, Town Close, the eastern part of University and south Bowthorpe wards)
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Further updated information from a recent Sport England on the need for sport halls will be reported to members verbally.

9. Accessible Countryside in the Urban Fringe

Through the GNDP and growth area development and funding more co-ordinated provision to provide access to the countryside will be planned. This will enable more accessible connections in and out of the urban areas via more sustainable routes.

Key areas of accessible urban fringe countryside to Norwich include:

Whitlingham Country Park

Caistor St Edmund

Catton Park

Possible future provision at Bawburgh Lakes

Smaller sites include Cary's Meadow, Charter Wood, Dunston Common and Horsford Pits.

Mike Burrell

10/10/11