



NORWICH
City Council

Committee Name: Sustainable development panel

Committee Date: 15/11/2022

Report Title: Article 4 Direction to remove permitted development rights for the conversion of offices to residential

Portfolio: Councillor Stonard, Cabinet member for inclusive and sustainable growth

Report from: Head of planning and regulatory services

Wards: Mancroft, Lakenham, Town Close, Thorpe Hamlet

OPEN PUBLIC ITEM

Purpose

To update members on the introduction of an article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre and to feedback on the recent discussions with the Department for Levelling Up, Housing and Communities.

Recommendation:

To recommend to cabinet on 14th December 2022 that the council formally ask the Secretary of State for Levelling Up, Housing and Communities to modify the proposed non-immediate Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets all the corporate priorities.

This report helps to meet the Local development plan for the city.

This report helps to meet business and local economy objective of the COVID-19 Recovery Plan

Report Details

1. Norwich City Council made an Article 4 Direction on 28 July 2021 in order to remove permitted development rights for the conversion of offices to residential within the city centre. The Direction was confirmed on 8 December 2021 further to it being considered at [Cabinet](#) however due to the need to give 12 months notice to avoid compensation claims it was not due to come into force until 29th July 2022.
2. The Council received correspondence from Department of Levelling Up, Housing and Communities about the Article 4 Direction in May 2022 which set out that they are not convinced that the Article 4 Direction complies with new national policy where an Article 4 Direction related to change from non-residential to residential use should apply to the smallest geographical area possible. Whilst they feel that the evidence provided is helpful in setting the strategic context and helps demonstrate the condition of the office market in Norwich, they consider that we have failed to take a sufficiently targeted approach to the assessment of the impacts of the permitted development rights in locations throughout the city centre. They highlight that such an approach is necessary to ensure that the Article 4 Direction meets the tests that they should apply only to the smallest geographical area possible. This was a risk that was identified within previous committee reports.
3. In order to make the Article 4 Direction more targeted, Norwich City Council commissioned Ramidus Consulting Ltd to help produce additional evidence in the form of a study which recommends areas, streets and/or buildings which should be protected by virtue of the newly defined Article 4 Direction area. The purpose of this additional work was to inform a revised geographical area for the Article 4 Direction in the hope that we can successfully bring the Article 4 Direction into force.
4. Working closely with Ramidus we have undertaken significant work and submitted a proposed revised geographical boundary to officers at DLUHC for their informal consideration and comment. Feedback was received on 19th October 2022 to say that officers at DLUHC are comfortable with our revised proposal. Therefore, it is proposed that a recommendation is put to Cabinet on 14 December 2022 that the Council formally asks the Secretary of State for Levelling Up, Housing and Communities to modify the Direction so that it can be brought into force at the earliest possible opportunity. It is not proposed to withdraw the existing Article 4 Direction and submit a new one as this would require a further 12 months' notice; however the Secretary of State is able to modify the Direction which means it can come into force a lot sooner.
5. The section below outlines the process which we went through to redefine the geographical area and the newly proposed boundaries for the Article 4 Direction are shown in the appendices to this report.

The process

6. The first stage of the process involved mapping all of Norwich's city centre offices using data obtained from Valuation Office Agency records. This data includes any hereditaments that are recorded as being offices. Whilst this data is not 100% accurate it was considered a good starting point and any non listed office buildings that were not included within it were hopefully picked up during the site visit process. The mapping process also allowed us to be able to identify which of these offices were statutory listed buildings. The decision was made that there would be no need to survey the statutory listed buildings as these do not need protection through an Article 4 Direction; but we felt that it is important to show them on our mapping exercises as it helps to identify clusters and shows the true picture of how Norwich's offices are distributed across the city centre. Appendix 1 shows all offices within the city centre (including offices within statutory listed buildings) and Appendix 2 shows all offices other than those within listed buildings. One of the main observations gained from this mapping exercise is how scattered offices are across the city centre although there are some areas of the centre where clusters can be identified.
7. A spreadsheet containing details of occupiers and address points for all non-listed office buildings was then supplied to Ramidus. In order to make the survey work more manageable, the city centre was broken down into seven key character areas, namely:
 - North of the River
 - Norwich Lanes
 - Whitefriars
 - St Stephens
 - Norvic House
 - Prince of Wales & King Street
 - Station area.
8. Local knowledge and desk-based research enabled some sifting of buildings, with for example offices situated within shopping centres and purpose built student accommodation being discounted along with those proposed for demolition as part of a wider redevelopment scheme.
9. The survey work was carried out by Ramidus and for each site the following details were observed and recorded on the spreadsheet. Photos were taken of all sites.
 - Occupier/owner
 - Address details
 - Occupied/vacant
 - Floors, use, condition and age
 - Typology, size and locational factors
 - Curb appeal, historic significance
 - Comments

10. Ramidus then used their professional judgement to apply a 'RAG' status to each office building. This separated the offices into the following categories:

Red – office premises that must be protected as their loss would be wholly unacceptable

Amber – very important premises but where there are uncertainties that needed discussion with the Council. These were subsequently recategorized as either red or green.

Green – A case could be made for their release despite some of the offices still being considered important as their loss could not be justified as 'wholly unacceptable'.

11. Norwich City Council then produced two maps. The first map shows the proposed modified Article 4 Direction (appendix 3) so this includes any offices that were identified as red within the RAG status. The second version of the map (appendix 4) not only shows the proposed direction but also shows offices that were discounted and offices that are listed buildings. This contextual map is not proposed to be published alongside the modified Direction however it is considered important in demonstrating how the proposed Article 4 Direction would relate to the wider office economy. A list of proposed buildings for Article 4 Direction protection is included within Appendix 5.

12. Ramidus also produced a short report which sets out their findings (appendix 6). One of the key things to note is that Norwich's office economy would appear to be very different from a number of other cities. It does not have a central business district but instead offices are scattered across the city centre which in itself makes the office economy quite vulnerable. A number of very important clusters have been identified through the mapping exercise, but the exercise has also highlighted how important a number of our individual offices are too.

13. Ramidus undertook a very thorough assessment, and we feel that a justified case has been made for each office that has been identified for protection. Each of these offices play an important role due to their size, location, character or affordability but each of them also plays a fundamental role in ensuring that Norwich retains a variety of premises from small, affordable offices to large corporate office buildings. Norwich has lost around a third of its office accommodation since 2008 and through assessing all existing individual office buildings we have now identified a significant amount of office accommodation that we feel wouldn't meet the 'wholly unacceptable' test and would need to accept its loss (in some instances rather reluctantly). We are however of the opinion that the loss of any of the premises identified for protection would not only be wholly unacceptable on an individual basis, but it would erode the office economy to the extent whereby the very survival of the city centre office market is at risk. Only through seeking to protect the identified offices will Norwich be able to meet need and demand and ensure that the office economy thrives. Therefore, it is officer's opinion that the principle of the loss of any of the identified offices would be wholly unacceptable without being able to fully consider its impact through the planning application process. The Direction does not necessary mean that all offices will be prevented from changing to residential. Instead, it will enable the Council to manage it and to consider all material planning

considerations including the impact that the loss of offices will have upon our economy as well as ensuring that housing is of good quality.

14. It should be noted that we have included some office buildings which do exceed 1,500sqm which officers at DLUHC have warned against doing. These are strategically important offices and whilst we acknowledge that the current wording of the General Permitted Development Order would prevent the building in its entirety being converted in one go, we do have concerns that the threshold could change or one floor at a time could be converted to residential which could have a significant and wholly unacceptable impact in itself. Therefore, it is proposed that these buildings be included as we believe a justified case has been made; however we acknowledge that there is a risk that DLUHC will ask that these be removed.
15. We have now put forward our case to DLUHC on an informal basis and feedback received from officers so far would suggest that they are comfortable with our revised proposal. The next step is to put forward a formal request to the Secretary of State to modify our Direction and the recommendation for this panel is that we recommend to Cabinet that this request is made. Subject to the Secretary of State for Levelling Up, Housing and Communities agreeing that our case is now supported by overwhelming evidence and meets the test of applying to the smallest geographical area possible the Direction should be able to be brought into force on the revised boundaries.
16. If successfully brought into force, then any change of use from office to residential within the Article 4 Direction area will require full planning permission and the assessment of planning applications will need to take into account the existing and emerging local plan which enables the LPA to consider all material planning matters. Currently policy DM19 seeks to protect high quality office space over 1,500sqm and DM17 seeks to protect smaller businesses. In terms of the emerging Greater Norwich Local Plan, the regulation 19 version of the plan set out that the loss of existing office floorspace will be resisted. A modification has since been proposed to take into account that the Article 4 Direction is going to be more targeted but to also add a clause that enables offices to change use if it can be demonstrated that the loss of the office accommodation would not be of detriment to Norwich's office economy. The proposed wording also seeks to protect offices within listed buildings as these will not be covered by the Article 4 Direction. The proposed working is as follows:

To support this, loss of existing office floorspace will be resisted

- a) within the area to be defined under the 'Article 4 direction relating to the conversion of offices to residential';
- b) where the office accommodation to be lost would exceed 1,500sqm and the site is within the city centre (as defined by map 9), with the exception of any existing office building situated within site allocation GNLPO506; or
- c) for all statutory listed office buildings situated within the city centre (as defined by map 9),
unless it can be demonstrated that its loss will not be of detriment to Norwich's office economy.

Consultation

17. A consultation took place when the Council made the Direction in July 2021. Responses to the consultation were set out within the November 2021 SD panel report. There is no requirement for a further stage of consultation where Ministers agree to modify a Direction; however the Council will be required to publicise the notice as soon as practicable and the Direction can then come into force from the date of publication.
18. Informal comments have been sought from the DLUHC on the modified boundary and officers have confirmed that they are comfortable with the revised proposal.
19. The portfolio holder has been briefed and has advised that we proceed.

Implications

Financial and Resources

20. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.
21. There will be a financial cost associated with further publicity for introducing an Article 4 direction. It is expected that this will be met from existing budgets.
22. The initial Ramidus study was funded through Towns Deal funding. The most recent study was met from existing budgets. We have already given 12 months notice of bring the direction into force which will avoid any compensation claims.

Legal

23. Legal advice has been sought through the process. Once brought into force, the Direction will need to be registered as a land charge.

Statutory Considerations

| Consideration | Details of any implications and proposed measures to address: |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Equality and Diversity | The LPA is not able to secure affordable housing under prior approval applications. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and comes into force, the Article 4 direction will enable the LPA to secure affordable housing where it is viable. |

| Consideration | Details of any implications and proposed measures to address: |
|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Health, Social and Economic Impact | <p>The size and quality of flats delivered through permitted development rights have often been substandard as they are not of sufficient size or provide sufficient natural light or external amenity space to provide a good quality of life for future residents. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and comes into force, removing permitted development rights will enable the LPA to have more control over internal and external amenity for future residents for example through requiring flats to meet national space standards.</p> <p>There has been an uncontrolled loss of office accommodation within Norwich since the introduction of permitted development to convert offices to residential and it has been identified within a recent study that Norwich's office economy is in a fragile and vulnerable condition. The impact of this report to make an article 4 direction protecting Norwich's office economy will not have any direct impacts but, once the direction is confirmed and comes into force, this will enable the LPA to consider whether the loss of an office building within the city centre is acceptable on a case by case basis. This will allow stock that is truly redundant to change use while, on the other hand, being able to protect space of strategic value. This therefore has the potential to have a positive impact on economic development.</p> |
| Crime and Disorder | Neutral impact |
| Children and Adults Safeguarding | Neutral impact |

| Consideration | Details of any implications and proposed measures to address: |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environmental Impact | <p>Under prior approval applications no physical alterations can be made to the building. If required these come forward as a separate application. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and comes into force, having one planning application for the change of use and physical alterations will enable the LPA to better consider the impacts of the development in order to ensure that the proposal enhances the built environment. It will also enable the LPA to secure landscaping via a condition which will have a positive upon both the natural and built environment.</p> <p>Under prior approval applications the LPA is not able to require 10% of energy to be from decentralised and renewable or low carbon energy sources. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and comes into force, the Article 4 direction will enable the LPA to consider energy for all sites of 10 or more dwellings.</p> |

Risk Management

| Risk | Consequence | Controls Required |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| There is a risk that DLUHC do not accept the modification and that the article 4 direction may fail. | Given that the majority of work has already been done, the further financial resource implications are relatively minimal. | We have submitted our proposed modification to officers at DLUHC on an informal basis which should minimise the risk of failure. We feel that our case is supported by overwhelming evidence and is now geographically limited. |

Other Options Considered

24. The alternative option is to not introduce an article 4 direction. This option is not recommended as it would prevent the Council from having any future control over the conversion of offices to residential through permitted development rights.

Reasons for the decision/recommendation

25. It is felt that our case is supported by overwhelming evidence and the Article 4 Direction will help protect Norwich's office economy.

Background papers: None

Appendices:

Appendix 1: All offices within Norwich City Centre

Appendix 2: All offices within Norwich City Centre (excluding offices within Listed building)

Appendix 3: Proposed modified Article 4 Direction geographical area

Appendix 4: Contextual map

Appendix 5: List of proposed office buildings for Article 4 Direction protection

Appendix 6: Summary of research to support the introduction of an article 4 Direction for Norwich City Centre, Ramidus, September 2022

Contact Officer:

Name: Joy Brown

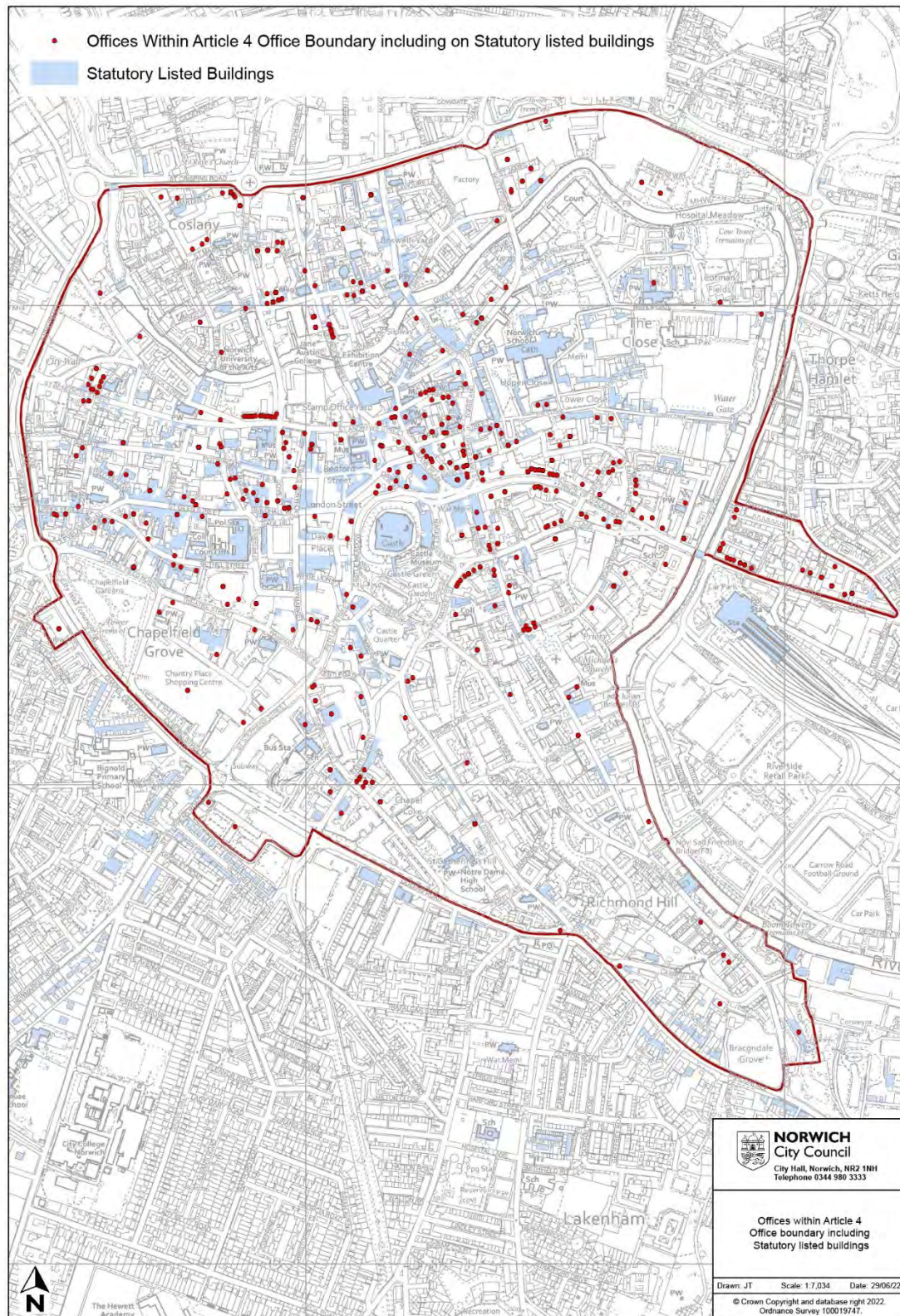
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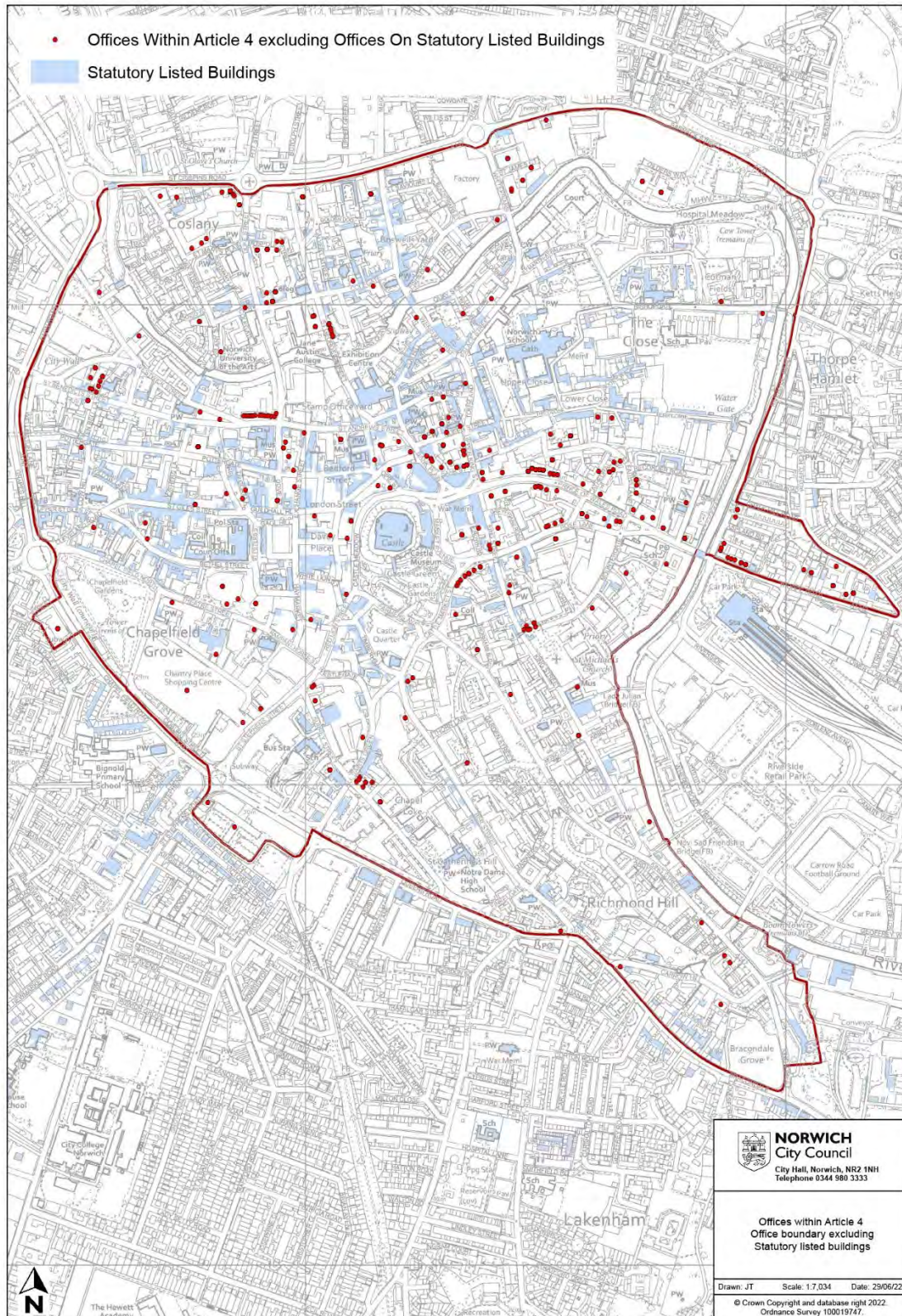


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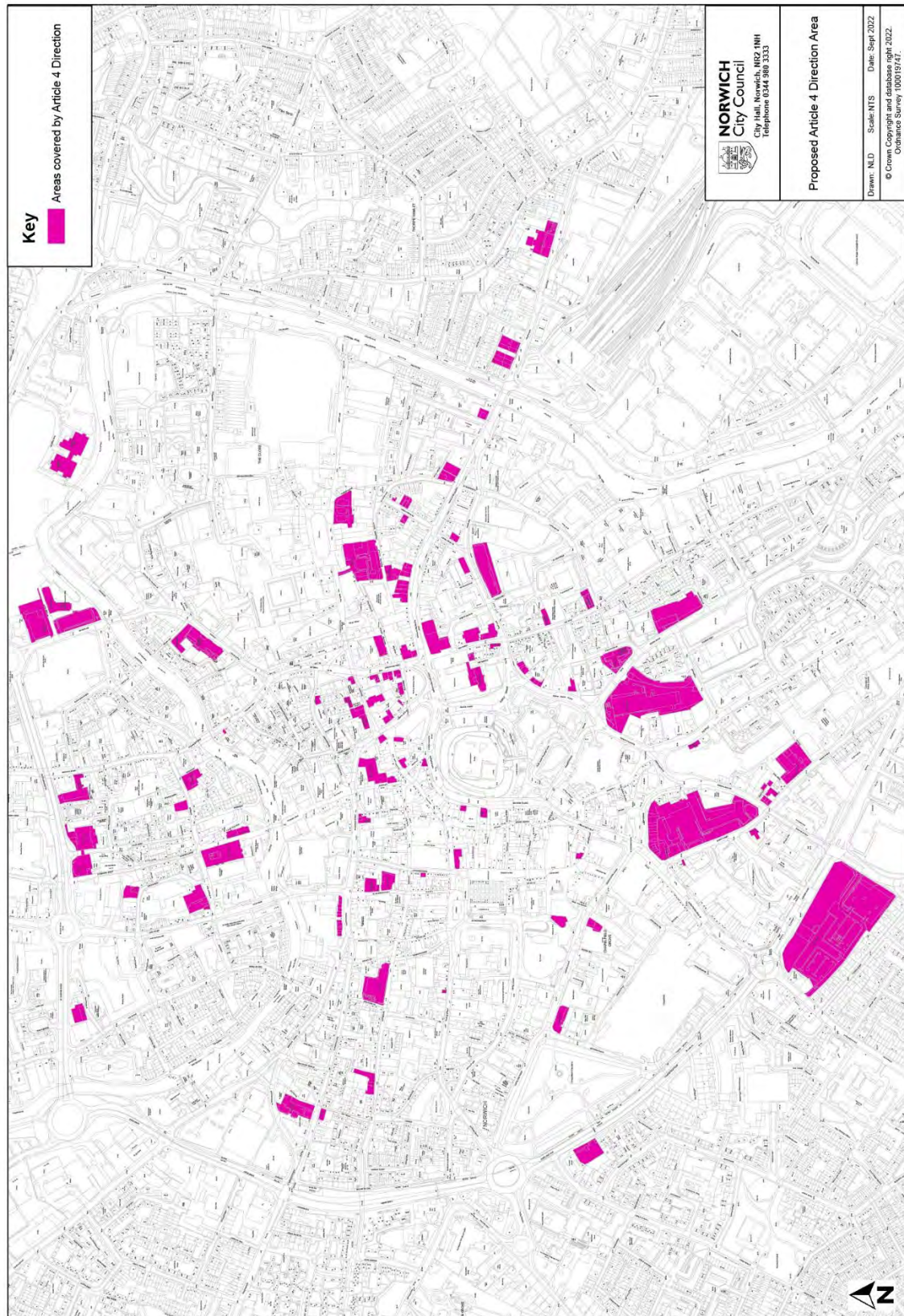
Appendix 1: All offices within Norwich City Centre



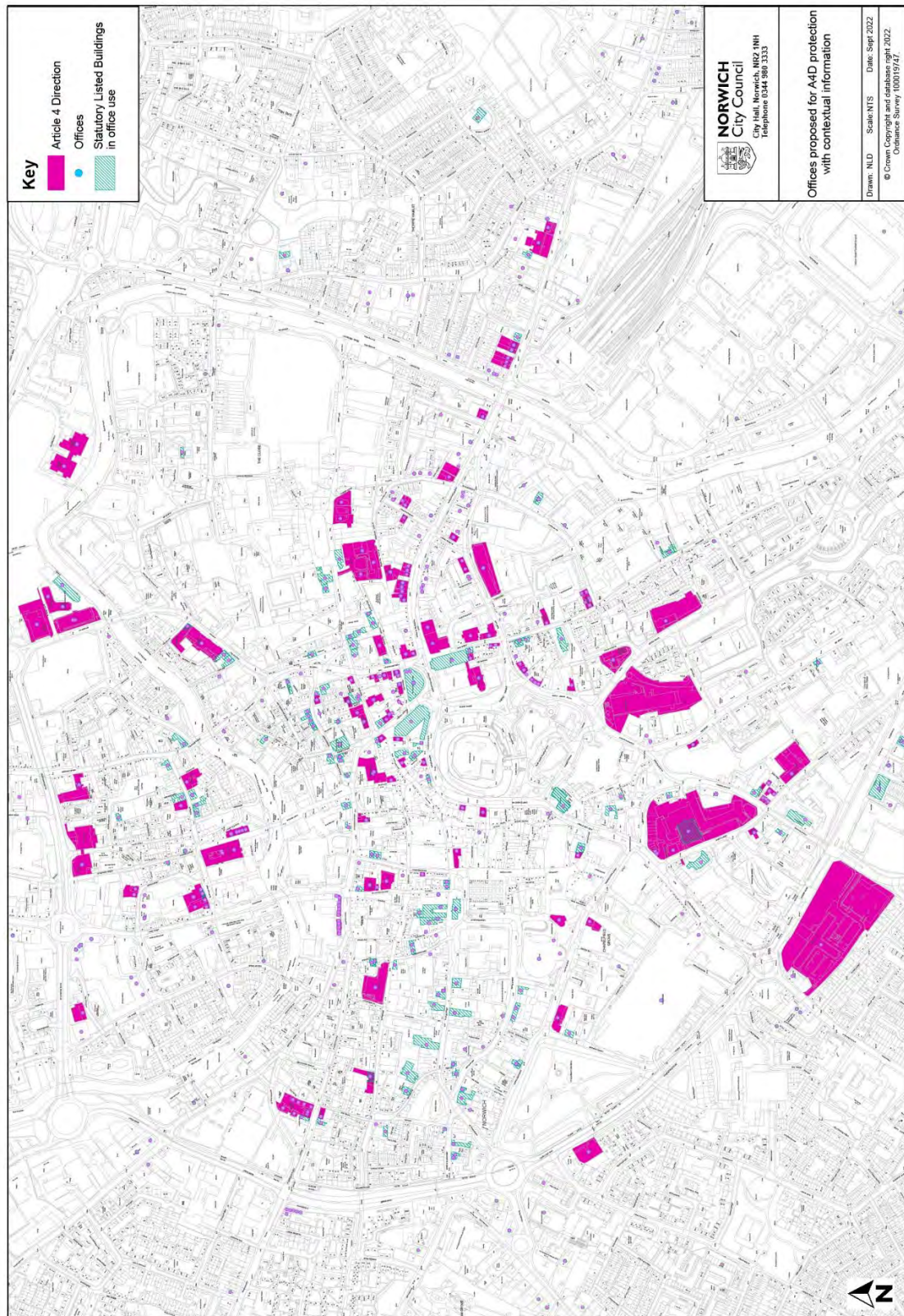
Appendix 2: All offices within Norwich City Centre (excluding offices within Listed building)



Appendix 3: Proposed modified Article 4 Direction geographical area



Appendix 4: Contextual map



Appendix 5: List of proposed office buildings for Article 4 Direction protection

1-3 Saint Court, All Saints Green
47 All Saints Green
49 All Saints Green
51 All Saints Green
Norwich Union Island Site, All Saints Green
1 Bank Plain
7 Bank Plain
9 Bank Plain
19 Bank Plain
8-10 Bank Plain
12 Bank Plain
16 Bank Plain
1 Bedding Lane
17-23 Ber Street
7 Castle Meadow
10 Castle Meadow
24 Castle Meadow
10-12 Cathedral Street
13-15 Cathedral Street
17 Cathedral Street
23 Cathedral Street
The Old Drill Hall, 23 a Cattle Market Street
26 Cattle Market Street
27 Cattle Market Street
28 Cattle Market Street
Brancaster House, 30 Cattle Market Street
Nadler House, 31 Cattle Market Street
Norvic House, 29-33 Chapel Field Road
1 Charing Cross
3 Charing Cross
5 Charing Cross
7 Charing Cross
9 Charing Cross
11 Charing Cross
15 Charing Cross
17 Charing Cross
19 Charing Cross
21 Charing Cross
23 Charing Cross
25 Charing Cross
St Clements House, 2 -16 Colegate
21 Colegate
47 – 49 Colegate
The Guildhall, 51 Colegate
55 Colegate
Townshend House, 30 Crown Road
32 Crown Road
Mall Chambers, 40 Crown Road

12-14 Exchange Street
Dragonfly House, 2 Gilders Way
Kingfisher House, 1 Gilders Way
Netherconesford, King Street
31 King Street
Communications Centre, 33 King Street
46 King Street
61 King Street
10 London Street
56-58 London Street
68 London Street
Sackville Place, 44 – 48 Magdalen Street
2 Millennium Plain
19 Muspole Street
21 Muspole Street
3-5 Orford Place
Centenary House, 19 Palace Street
Kiln House, 27-43 Pottergate
1 Prince of Wales Road
2 Prince of Wales Road
11 Prince of Wales Road
32 Prince of Wales Road
34 Prince of Wales Road
36 Prince of Wales Road
38 Prince of Wales Road
40 Prince of Wales Road
44 Prince of Wales Road
46 Prince of Wales Road
48 Prince of Wales Road
100 Prince of Wales Road
Portland House, 102-104 Prince of Wales Road
15-17 Princes Street
Victoria House, Queens Road
2-4 Queen Street
5 Queen Street
16-18 Queen Street
Haldin House, Old Bank of England Court, Queen Street
Jacquard House, Old Bank of England Court, Queen Street
New Patrick's Yard, 2 Recorder Road
44 Rose Lane
Union Building, 51-59 Rose Lane
Rouen House, Rouen Road
20 Rouen Road
Prospect House, Rouen Road
3 St Andrews Hill
Lawrence House, 5 St Andrews Hill
Cavendish House, 28-32 St Andrews Street
Woolgate Court, St Benedicts Street
Woburn House, 80-84 St Benedicts Street

Stannard Place, St Crispins Road
90 St Faiths Lane
13 -15 St Georges Street
17 - 19 St Georges Street
The Atrium, St Georges Street
St Giles House, 27 St Giles Street
1 St James Court
Carmelite House, 2 St James Court
3 St James Court
Golden Lion House, 15 St John Maddermarket
Charing Cross Centre, 17-19 St John Maddermarket
Norfolk House, St John Maddermarket
Cotman House, 53 - 57 St Martins Lane
1-5 St Stephens Street
St Vedast House, 5-7 St Vedast Street
2 Surrey Street
5 Surrey Street
8 Surrey Street
25-27 Surrey Street
32-38 Surrey Street
Norfolk Tower, 48-52 Surrey Street
Boars Head Yard, Surrey Street
South Tower, Surrey Street
Holland Court, The Close
13 The Close
14 The Close
15 The Close
Dencora House, Theatre Street
4 Theatre Street
8 Thorpe Road
10 Thorpe Road
12 Thorpe Road
16 Thorpe Road
18-20 Thorpe Road
Yare House, 62-64 Thorpe Road
66-70 Thorpe Road
Compass House, 4 Upper King Street
8-10 Upper King Street
12 Upper King Street
Kingstreet House, 15 Upper King Street
19 Upper King Street
22 Wensum Street
1-17 Westlegate

NORWICH CITY COUNCIL

SUMMARY OF RESEARCH TO SUPPORT THE INTRODUCTION OF AN ARTICLE 4 DIRECTION FOR NORWICH CITY CENTRE

16th SEPTEMBER 2022



1. Context

Norwich City Council made an Article 4 Direction on 28th July 2021 in order to remove Permitted Development Rights allowing the conversion of offices to residential within the city centre. The Direction was due to come into force on 29th July 2022. However, in May 2022, the Department of Levelling Up, Housing and Communities informed the Council that the Article 4 Direction failed to comply with new national policy stating that Article 4 Direction should apply to the smallest geographical area possible.

The Department advised the Council that it had failed to take a sufficiently targeted approach to the assessment of the impacts of Permitted Development Rights in locations throughout the city centre. In light of this advice, the Council asked Ramidus Consulting to undertake a study to help inform a revised geographical area for the Article 4 Direction and to produce the additional evidence base required to successfully bring the revised Article 4 Direction into force.

2. Study requirements

The Brief for the study required output which recommended areas, streets and/or buildings which should be protected by virtue of the newly defined Article 4 Direction area. The brief asked that the key outputs from the study should include the following.

- Map of existing offices within the A4D area (excluding listed buildings).
- Spreadsheet of existing offices within the A4D (excluding listed buildings).
- Spreadsheet of all offices (non-listed) including data which identifies factors such as user, class/typology, age, locational factors, historical significance and amenities.
- Identification of offices which would have a wholly unacceptable impact if they were lost to residential (taking into account size thresholds).
- List of buildings to be protected.
- Map identifying the streets and/or buildings for inclusion within the Article 4 Direction (possibly to be produced by Norwich City Council).
- Summary of key findings.

3. Study methodology

The Council provided Ramidus with maps and spreadsheets of all offices within Norwich city centre. This information was obtained from Valuation Office Agency records and includes any hereditaments that are recorded as being offices. Appendix One provides a map showing the buildings identified for detailed survey work. The Council and Ramidus identified a series of character areas to make the survey work more manageable, which resulted in the city centre being broken down into seven key character areas, as follows.

- North of the River Wensum
- Norwich Lanes
- Whitefriars
- St Stephens
- Norvic House
- Prince of Wales & King Street
- Station Area

Local knowledge/desk based research enabled some sifting of buildings at this stage to exclude, for example, any sites with little prospect of being converted due to being situated within shopping centres or those proposed for demolition as part of a wider

redevelopment scheme.

Survey work was undertaken on Monday 1st, Tuesday 2nd, Wednesday 3rd and Sunday 21st August. Each building was visited, photographed and surveyed. Some 239 buildings were surveyed, and the following details were recorded. Appendix Two shows an extract from the spreadsheet.

- Occupier/owner
- Address details
- Occupied/vacant
- Floors, use, condition and age
- Typology, size and locational factors
- Curb appeal, historic significance
- Red-amber-green status
- Comments

Premises sizes and ages were estimated. Clearly this cannot be a precise exercise, and so categories were used in each case, as shown below.

| Category | Approx. size ranges, sq m | Approx. size ranges, sq ft |
|----------|---------------------------|----------------------------|
| 1 | <100 | <1,000 |
| 2 | 100-500 | 1,000-5,000 |
| 3 | 500-1,000 | 5,000-10,000 |
| 4 | 1,000-1,500 | 10,000-15,000 |
| 5 | 1,500-3,000 | 15,000-30,000 |
| 6 | >3,000 | >30,000 |

The 1,500 sq m (15,000 sq ft) boundary was selected so that premises requiring a full planning permission prior to conversion to residential can be identified.

| Category | Typology |
|----------|----------------------------------|
| 1 | Purpose built, since 2000 (est.) |
| 2 | Purpose built, 1980-2000 (est.) |
| 3 | Purpose built, post-war |
| 4 | Purpose built, pre-war |
| 5 | Former dwelling |
| 6 | Former commercial premises |
| 7 | Other (specify) |

A fundamental aspect to the revised guidance on Article 4 Directions is that protected buildings must be identified as such only when their potential loss could be deemed to have a 'wholly unacceptable' impact. To this end the survey involved applying a 'RAG' status to each building – Red, Amber or Green. Red applied to buildings that should certainly be protected as the existing office meets a particular need and the loss of the individual office or cluster would have a wholly unacceptable impact upon Norwich's office stock; green was applied where there was a case for their release, and amber was used when there was uncertainty.

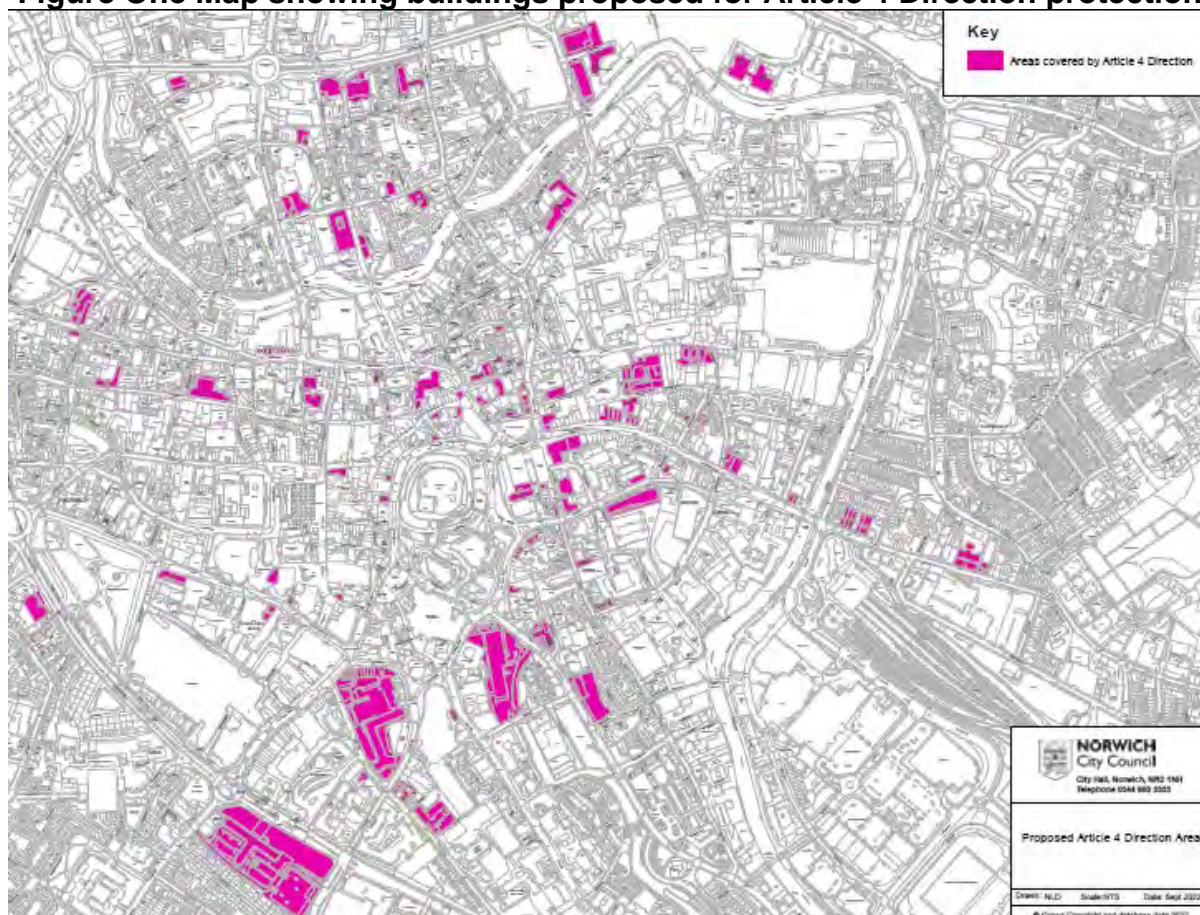
Following the fieldwork, all of the 'Ambers' were then discussed with the Council. Combining local knowledge and policy background, the Ambers were then allocated

either Red or Green status, depending on the outcome of the discussion. Black was used when survey work identified that the building was no longer in commercial office use.

4. Summary findings

The key output from this study is the Excel spreadsheet recording the detailed survey work. This, along with the photographic record, should be read alongside this summary. Figure One provides a visual record, prepared by the Council, of all those buildings allocated a 'Red' status in the RAG assessment described above. Having visited and surveyed in detail each of these premises, and the context within which they sit, it is our opinion that each of these buildings should be subject to an Article 4 Direction as the loss of any of these offices would be wholly unacceptable. The map excludes Listed buildings.

Figure One Map showing buildings proposed for Article 4 Direction protection



There are a number of points that can be drawn from the spreadsheet and the map.

- The office stock in Norwich city centre is scattered rather than concentrated. There is no 'central business district', nor are there identifiable concentrations, where office use is dominant.
- The scattered nature of the office stock increases the vulnerability of the individual parcels. Without policy protection, these could be gradually denuded until the point where the whole office market is further weakened.
- The strongest areas in terms of office use include the following.
 - Bank Plain/St Andrew's Street

- Charing Cross
 - North of River Wensum
 - Prince of Wales Road/Cattlemarket Street
 - Surrey Street/St Stephens Street
 - Thorpe Road
 - Whitefriars
- The stock of office premises is enormously variable, ranging from small, period offices above retail premises to large, modern corporate office buildings.
 - The range of types and sizes of office space in Norwich is essential for meeting a diverse demand profile, including the need for affordable offices.
 - A significant proportion of Norwich's offices are in 19th century and earlier buildings, often town houses. These work exceptionally well for small, professional firms, providing sub-divisibility, natural light and air, and a central location.
 - A number of self-contained, office buildings – particularly those dating from the 1960s-1980s – have already been converted to residential use and those remaining are particularly vulnerable due to the relative ease with which they can be converted.
 - The premises surveyed were, on the whole, well occupied, with little evidence of vacancy. There was minimal indication of neglect or obsolescence.

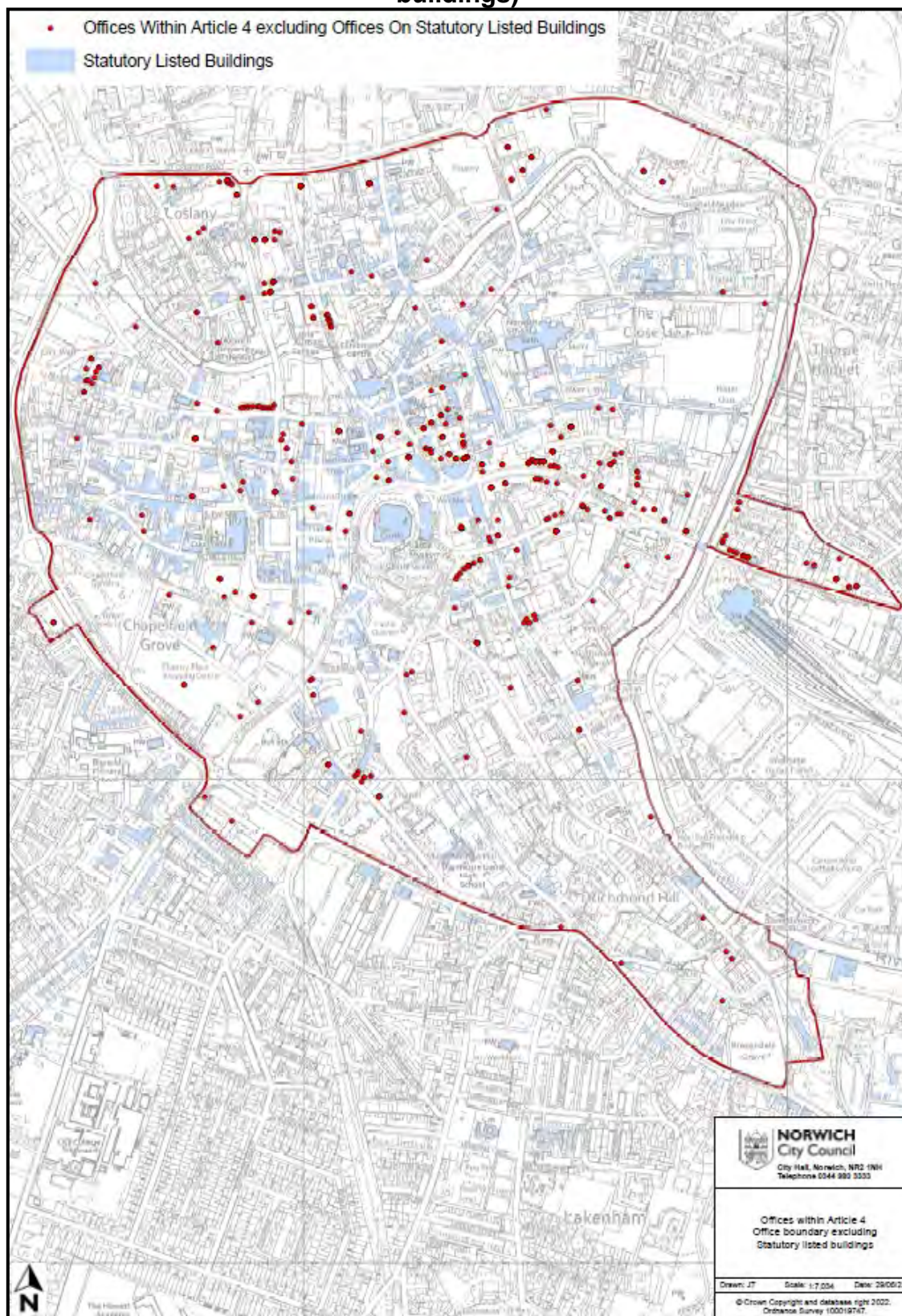
5. Concluding remarks

Norwich has lost a significant amount of office floorspace since the extension of Permitted Development Rights to ease the change of use from office to residential. This has left the office economy in a fragile state. The existing office stock is scattered across the city centre which leaves it highly vulnerable. It is fundamental that Norwich retains a variety of premises from small, affordable offices to large corporate office buildings in order to meet need and demand and to ensure that Norwich's office economy thrives.

The comprehensive survey work has identified those buildings which must be retained as offices as their loss would be considered wholly unacceptable. It has also identified offices which could be released for other uses. The loss of a number of these more marginal offices would be considered regrettable; however it is unlikely that Norwich City Council could justify that their loss would be wholly unacceptable.

Appendix One

Norwich City centre Offices (excluding offices within statutory Listed buildings)



Appendix Two Extract from data sheet

| NORWICH LANES | | | | | | | |
|-----------------------------------------------|----------------|--------|---------------|----------|--------------------|--------|---------------------------|
| Occupier/owner | Name | Number | Street | Postcode | Occupied or vacant | Floors | Use |
| Watsons | | 1 | Bank Plain | NR2 4SF | occupied | 1-3 | estate agent office |
| Trustees Of The Georgics Pension Fund | | 7 | Bank Plain | NR2 4SF | vacant (to let) | G-2 | retail + office |
| | | 9 | Bank Plain | | occupied | g-2 | offices over estate agent |
| Dna Norwich Limited/Northwood Lettings | | 11 | Bank Plain | NR2 4SF | retail unit | | |
| Fosters Solicitors | William House | 19 | Bank Plain | NR2 4FS | occupied | 1-2 | solicitor |
| | | 8-10 | Bank Street | NR2 4SE | occupied | g-1 | professional office |
| B U I L D | | 12 | Bank Street | NR2 4SE | occupied | g-1 | Build Charity |
| Na Marketing Services Limited | | 16 | Bank Street | NR2 4SE | occupied | g-2 | estate agent office |
| Howes Percival LLP | Flint Building | 1 | Bedding Lane | NR3 1RG | occupied | g-1 | law firm |
| Uttings Limited | Graphics House | 60 | Bethel Street | NR2 1NR | occupied | g-1 | parcel collection point |
| Ymca | | 62 | Bethel Street | NR2 1NR | occupied | | |
| Miss Mia Boorman T/A La Cala/Suntrap | | 2 | Castle Meadow | NR1 3PY | vacant | 1 | office over f&b |
| First Eastern Counties Buses Limited | Davey House | 7 | Castle Meadow | NR1 3DE | occupied | g-2 | office over travl centre |
| Don'T Paye Too Much Ltd | | 10 | Castle Meadow | NR1 3DE | occupied | g-2 | accountancy |
| Cambridge Accountancy Services Ltd | | 24 | Castle Meadow | NR1 3DH | occupied | 2-3 | offices over Trailfinders |
| Mrs Natalie Bussey T/A Fossi Hair & Beauty | | 8 | Castle Street | NR2 1PD | occupied | 1-2 | office over shop |
| Malmains & Co Ltd T/A Martin & Co | | 1 | Charing Cross | NR2 4AL | occupied | g-2 | estate agent |
| Philip Noble & Son | | 3 | Charing Cross | NR2 4AX | occupied | g-2 | property management |
| Root Norwich Ltd/Howards Residential Lettings | | 5 | Charing Cross | NR2 4AX | occupied | g-2 | Root' |

Appendix Two Extract from data sheet (cont'd)

| Condition | Age | Type | Size | Locational Factors | Curb Appeal | Historic Significance | RAG status | Comments |
|-----------|-------------|------|------|--------------------------|-------------|-----------------------|------------|-------------------------------------------------------------|
| very good | 1930s | 4 | 3 | good, high street | yes | some | | upper floors of ground floor estate agent; quality space |
| fair | 1920s | 4 | 3 | high street | yes | some | | niche space, but good quality |
| fair | 1970s | 3 | 2 | in a cluster | no | no | | |
| | 1970s | | | | | | | ground floor retail unit beneath Fosters |
| very good | 1970s | 3 | 5 | high street | limited | no | | tired but useful office stock |
| good | 19th | 5 | 2 | side street | limited | no | | good quality space; recently refurbished |
| poor | 1910s/1920s | 5 | 1 | side street | yes | some | | multiple businesses |
| poor | 1900s | 5 | 1 | side street/corner | no | no | | three businesses listed; good affordable space |
| very good | 2000s | 1 | 5 | quiet location | yes | yes | | part historic/modern office building |
| fair | 1900s | 5 | 1 | quiet street | no | no | | former resi property converted to quasi office use |
| | | | | | | | | building been converted to YMCA |
| very poor | 1890s | 4 | 1 | off pitch, Fair location | no | no | | poor quality office above f&b; poss beauty parlour |
| good | 1920s | 4 | 4 | off pitch, fair location | no | no | | quality, regular space; must be protected |
| good | 1950s | 3 | 3 | off pitch, fair location | yes | no | | quality, affordable space over ground retail |
| good | 1960s | 3 | 2 | off pitch, fair location | no | no | | upper floors of travel business |
| poor | 1880s | 5 | 1 | central | no | no | | very small scale; difficult to protect; maybe access issues |
| very good | 1990s | 2 | 3 | busy road, corner plot | yes | no | | quite vulnerable |
| very good | 1980s | 3 | 3 | busy road | no | no | | quite vulnerable |
| very good | 1970s | 3 | 3 | busy road | no | no | | quite vulnerable |