NORWICH
City Council

Sustainable development panel

Date: Wednesday, 26 November 2014
Time: 10:00
Venue: Westwick room, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:

Councillors:

Stonard (chair)
Sands (M) (vice chair)
Ackroyd
Bremner
Boswell
Herries
Jackson
Stammers

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Date of publication**: Wednesday, 19 November 2014**

NORWICH City Council

MINUTES

Sustainable development panel

09:00 to 12:00 **24 September 2014**

Present: Councillors Stonard (chair) (to item 7 below), Sands (M) (vice chair) Ackroyd, Boswell, Bremner, Herries, Jackson and Stammers

1. Declarations of interest

There were no declarations of interest.

2. Minutes

RESOLVED to agree the minutes of the meeting held on 23 July 2014.

3. Planning policies for Houses in multiple occupation (HMOs) draft options paper

The head of planning services presented the report and together with the planning team leader (policy) answered members' questions on the proposed options, costs, arrangements for the consultation and licensing implications.

During discussion members considered the trends for the dispersal of HMOs in the city based on census data for 2001 and 2011 and the need to accommodate increasing numbers of students in the city. Members noted that public perception was that HMOs and a transient population led to an increase in anti-social behaviour, were detrimental to the character of an area and could damage public services. Members considered that the consultation document should clarify what these concerns were and put them into context. It was noted that the city did not have the intensity of student populations such as Headingley in Leeds or parts or Nottingham. These areas were empty out of term time and affected services such as local schools because there were no children in the local population to feed into schools. However, there were concerns in some areas of the city, such as University ward, parts of Bowthorpe and Wensum, where local residents considered that the sense of community was being lost. A member for Nelson Ward said that he lived adjacent to students and had not experienced undue disturbance. The council worked with the universities to prevent anti-social behaviour and to promote the correct use of waste and recycling bins by students; and addressed other residents' concerns. The student population contributed to the vibrancy of the city and the local economy.

The benefits of students living in the city and the retention of graduates in the city should be taken into account.

During discussion on the options a member suggested that option 3 could be applied to specific streets, such as Portland Street and Lincoln Street, with a high concentration of student houses. Compulsory registration and licensing of all HMOs would require a lot of resource if a scheme based on the Oxford model was to be introduced. Members also considered that HMOs should be an available housing option for people who were not students.

A member requested that the council promoted the provision of purpose built student accommodation in the city centre or on good transport links.

RESOLVED to:

(1) approve the draft HMOs policy options paper for consultation, subject to additional text being added to address and place into context the perception of the impact of HMOs on antisocial behaviour, impact on the character of an area and services;

(2) note that consultation responses will be reported to the panel in early 2015.

4. Response to the government's technical consultation on planning reforms

The planner (policy) presented the report, and together with the planning team leader (policy), answered members' questions.

The chair commented that the principle at stake was the loss of planning powers to the local authority and its ability to influence the development of the city. Another member pointed out that the extension of permitted development rights and the government's deregulatory measures undermined the ability of the council to operate as a planning authority. The permitted development right to change office buildings to residential use would mean that adopted policies under the Joint core strategy and local development plans could not be implemented.

Members considered that there should be a council response to I) proposed new permitted development rights for waste management facilities, subject to size restrictions despite waste management being a county function. It was proposed that for instance the location of a landfill site or other waste management facility should consider residential amenity.

Members noted that an extension to the prior approval process would result in a loss of income and impact on the service that the council as a planning authority could provide. It was estimated that the council's potential loss of comparative fees would be around £85,000 in the first year of implementation.

A member queried the council's support of the proposals to improve engagement with statutory consultees, particularly when consulting English Heritage on changes to listed buildings, including those in the council's ownership. The panel was advised that the council's response was qualified support. The relaxation of the rules removed unnecessary engagement with the statutory consultees on minor alterations to listed buildings where in effect these were merely nodded through. Members were advised that where the council determined its own applications the decision was subject to final approval by the Secretary of State.

In response to a member's question, the planner said that the formal proposal to the government under the Sustainable Communities Act to request a change in the planning regulations to control use class of public houses was about to be finalised. Other authorities had protected public houses from change of use class under Article 4 Directives.

RESOLVED to approve the report and ask the head of planning services to submit a response based on the report and subject to the addition of a comment in response to l) as follows:

"Residential amenity should be taken into consideration".

5. Affordable housing supplementary planning document – draft for consultation

The planner (policy) presented the report together with the planning team leader (policy). A copy of appendix 6, Glossary, comprising an explanation of the term strategic market assessment (SHMA) was circulated at the meeting. The Affordable housing viability review clause was a significant change. The council would have greater powers to secure alternative provision of affordable housing from a developer.

Discussion ensued in which members expressed concern that developers might try to circumvent affordable housing by constructing the number of dwellings on a site below the threshold or to renegotiate S106 agreements to reduce their obligations. Members were advised that there was a mechanism to ensure a minimum density of housing (40 per hectare) per site. The council's solicitors (nplaw) finalised S106 agreements. The application of housing viability review to S106 agreements was becoming standard practice nationwide.

During discussion the planner (policy) explained the circumstances where off-site provision of affordable housing was reasonable due to problems with topography and site contamination. Members were referred to appendix 4: Viability assessment requirements and advised that District Valuer provided an independent assessment of land values.

RESOLVED to approve the Affordable housing supplementary planning document as a draft for consultation for a period of four weeks as soon as is reasonably practicable following this meeting.

6. Carbon footprint report

The environmental strategy officer presented the report and explained that the electricity baseline data had been readjusted in line with the requirement of the Department for Environment Food and Rural Affairs (Defra)/Department of Energy and Climate Change (DECC).

During discussion members noted that the adjustment for weather conditions was no longer used and therefore it would be harder to identify where more fuel was used to offset extreme cold weather conditions.

A member expressed concern that the council had signed up for a Green tariff with Scottish and Southern Electricity which did not comply with the Ofgem green supply guidelines and therefore was not eligible for a claim for CO2 reduction.

Members welcomed the report and noted that with the adjustments 26.6% of the 40% target had been achieved.

RESOLVED to note the report.

7. Integrated waste management strategic objectives – quarterly update no 3 2014

(Councillors Stonard and Bremner left the meeting during this item. Councillor Sands, the vice chair, was in the chair.)

The environmental services development manager presented the report and pointed out that there was a roadshow at The Forum to promote the changes to recycling in the county. Free compostable liners for food waste bins were available.

Discussion ensued in which the environmental services development manager and project officer answered members' questions. Both members and officers expressed surprise at the results of the recycling services audit in respect of the Acorn 3 group and it was suggested that someone moving out or something might have affected the results, but this could be due to the audit taking place in June and students moving out of an HMO in the area. One member suggested that the Acorn categorisations were generalisations.

During discussion a member suggested that to encourage garden waste recycling brown bins could be provided free of charge to residents in areas of the terraced housing areas of the city and that residents could share them as gardens were small. The environmental services development manager said that the provision of free garden waste bins might be viewed by the county council as encouraging waste creation, which could impact on the future provision of recycling credits.

The environmental services development manager explained the arrangements for the new MRF recycling service. Members expressed an interest in visiting the plant. The environmental services development manager said that there were health and safety issues to be addressed before visits would be organised, but a video was currently being produced which would be made available. Discussion ensued on promotion of the new service by using stickers and leaflets to households, which gave rise to the question of how new residents moving into the city found out about waste and recycling collections.

Members were advised that the next waste electrical and electronic equipment (WEEE) would be held in January 2015, in partnership with the British Heart Foundation. It was noted that the charity had the ability to host the event and conduct electrical safety checks before sale. It was noted that there was no kerbside WEEE collection at present as it would require specific vehicles.

RESOLVED to note the report.

8. Panel commencement time

RESOLVED that the panel will commence at the later time of 10:00 when it meets the day after council meetings and 9:00 for other panel meetings, as follows:

Wednesday, 26 November 2014 – 10:00
Wednesday, 28 January 2015 – 10:00
Wednesday, 25 February 2015 – 9:00
Wednesday, 25 March 2015 – 9:00

CHAIR

Report to	Sustainable development panel	**Item**
	26 November 2014	4
Report of	Head of planning service	
Subject	Local plan update	

Purpose

This report updates members on progress with the adoption of local plan documents, strategic planning issues in relation to the emerging plans of neighbouring local authorities, and responses to government consultations.

Recommendation

To note the contents of this report.

Corporate and service priorities

The report helps to meet the corporate priority A prosperous city and the service plan priorities to implement the local plan for the city and to develop the local economy, promote inward investment, and regeneration activities.

Financial implications

None

Ward/s: All wards

Cabinet member: Councillor Stonard – Environment and transport

Contact officers

Judith Davison, policy team leader projects	01603 212529
Graham Nelson, head of planning services	01603 212530

Background documents

1. Norwich City Council response to Department of Communities and Local Government (DCLG) consultation ‘Housing Standards Review: technical consultation’ (November 2014).
2. Norwich City Council response to joint DCLG / DEFRA consultation ‘Delivering Sustainable Drainage Systems’ (October 2014).

Report

Introduction

1. This report is a general update for members on matters relating to the Norwich local plan, progress with other local plan documents in the wider Norwich area, and government consultations on planning matters.

2. In particular, it will cover:

    - Progress with the adoption of the Norwich local plan document and related supplementary planning documents;
    - Strategic planning issues relating to Broadland District Council's and South Norfolk Council's emerging local plan documents;
    - Norwich City Council's response to a government consultation on changes to the national planning policy for travellers; housing standards; and sustainable drainage.

Norwich local plan documents and SPDs

3. At its meeting on 12th November, cabinet agreed to recommend to council to adopt the *Site allocations and site specific policies local plan*, the *Development management policies local plan*, and the accompanying *Policies map.* The council meeting to consider adoption of these local plan documents took place on 25th November.

4. Subject to the decision of council (which had not taken place at the time of writing), the local plan documents will be formally adopted on 1 December and will replace the saved policies of the 2004 *City of Norwich Replacement local plan*. From that date the plans will form part of the development plan for Norwich alongside the adopted *Joint core strategy for Broadland, Norwich and South Norfolk* (adopted 2011 with amendments 2014) and the *Northern city centre area action plan* (2010).

5. A number of current supplementary planning documents, which relate specifically to policies in the 2004 *Replacement local plan,* will cease to apply from 1 December when that plan is superseded. Work is already underway on a range of supplementary planning documents (SPDs) required to replace these where required to supplement the policies in the new local plan.

6. Members are already aware of progress with the Main Town Centre and Retail Frontages SPD which will be considered for adoption by Cabinet on 10th December (and is the subject of a separate report to this panel meeting). As part of its programme of updating planning guidance, the council will bring reports to sustainable development panel in the next few months on the following supplementary planning documents and advice notes :

    - Affordable housing SPD;
    - Trees and landscape SPD;
    - Open space and play SPD; and

- Heritage interpretation advice note.

Strategic planning issues

7. **Broadland District Council** (BDC) consulted on the pre-submission versions of its Development management policies plan and Site allocations plan in April – May 2014. The city council's consultation response is available to view on Broadland District Council's website. In its response the council supported BDC's commitment to bringing forward a suite of local policies and allocations to complement and support the growth planned for the area through the adopted JCS. However, there are three areas on which the council has made objections on the grounds of soundness as it is considered that the proposed policies or allocations are not compliant with the National Planning Policy Framework (NPPF) and/or adopted policy in the JCS.

    - The allocation of the site at Fir Covert Road, Taverham (PS58-01) for retail development, which the city council considers to be inconsistent with the hierarchy of retail centres set out in the adopted JCS and paragraph 23 of the NPPF which seek to promote competitive town centres;
    - The lack of a consistent approach with the other JCS authorities with regard to thresholds for impact assessments in emerging Policy R1 (District, commercial and local centres). The city council objects to the lack of a lower threshold for impact assessments as encouraged by the JCS. Both the city council and South Norfolk Council (SNC) have set lower thresholds for impact assessments to protect the centres identified in JCS Policy 19. This approach has been tested at the examination in public of Norwich City Council's *Development management policies plan* and has subsequently been found sound.
    - The quantum of office development that could result from the proposed employment allocation north of Norwich International Airport (PS37-02) which may have a detrimental impact on existing and planned new offices within the city centre, and including a definition of "airport related development".

8. BDC has made no change to its policies or site allocations in response to the council's objections, and considers them to be sound in their current form. BDC has now submitted its Development management policies and Site allocations plans to the Secretary of State for public examination. The council has confirmed that it will maintain the objections outlined above, so that they will be considered by the inspector through the examination process. The council has chosen to deal with both site specific allocations through written representations, but a council officer will give evidence at the examination hearings in relation to the R1 objection given the strategic issues raised here and the potential impact on the strength and vitality of Norwich city centre and/or district and local centres.

9. A date has not yet been set for BDC's public examination. Feedback on the outcomes of the examination process will be provided to SD Panel in due course.

10. **South Norfolk Council** (SNC) recently conducted a public consultation on its emerging Gypsy and Travellers local plan document (GTLP - Issues and Options stage), which ended on 24th October 2014. The purpose of the plan is to set out how SNC will meet the accommodation needs of the Gypsy and Traveller and Travelling Showpeople community up to 2031.

11. SNC's assessment of need is based on a new Gypsy and Traveller Accommodation Assessment (GTAA) which it commissioned for the district council area. The revised accommodation assessment has resulted in a significantly reduced level of need for South Norfolk as compared with the level for the district in the GTAA carried out for the Greater Norwich area in 2012.

12. The Issues and Options GTLP is part of the early stage of plan development, and included a 'call for sites'. SNC sought responses to a number of general questions relating to the timescale for the plan, the approach to site selection, and site size. In its response, the council highlighted the need for the local plan to refer more explicitly to the need to work with neighbouring local authorities on gypsy and traveller provision, given the patterns of movement of the Gypsy and Traveller community revealed by the GTAA and the requirements of the Duty to Cooperate.

13. The city council's response to this consultation has been submitted to SNC and is available on SNC's website. The next stage in the plan's development is consultation on the Preferred Options plan which will include sites considered suitable for travellers. This is likely to take place in early 2015. It is anticipated that the GTLP will be adopted in mid-2016.

Responses to government policy consultations

Gypsy and Travellers

14. The council is currently developing its response to a DCLG consultation ('Planning and Travellers') which ends on 23rd November. The response is not yet finalised but will be reported to members at the SD Panel meeting. The purpose of the consultation is to seek views on the government's proposed changes to planning policy and guidance which aim to ensure that the planning system applies fairly and equally to both the settled and traveller communities; strengthens protection of sensitive areas and the Green Belt; and addresses the negative impact of unauthorised occupation.

15. The key aspect of the consultation is the proposed redefinition of 'gypsies and travellers' and 'travelling showpeople' for planning purposes. Current policy (set out in the government's 'National Policy for Traveller Sites', March 2012) requires that those who have ceased travelling permanently for reasons of health, education or old age are for the purposes of planning treated in the same way as those who continue to travel. The proposal is to amend the definition for 'gypsies and travellers' as follows (with amendments underlined):

> *Persons of nomadic habit of life whatever their race or origin, including such persons who on ground only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily <u>or permanently</u>, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

16. The definition of travelling showpeople is amended in the same way.

17. Under these proposals, where a member of the travelling community has given up travelling permanently for whatever reason, and applies for a permanent site, then this should be treated no differently to an application from the settled population (such as seeking permission for a Park Home). This would not prevent applications for

permanent sites but would mean that such applications would be considered as any other application for a caravan would be (ie not in the context of the 2012 Planning Policy for Traveller Sites).

18. Key aspects of the council's response are set out below. In summary the council considers the proposed policy to be inequitable, likely to be difficult to implement, and has the potential for legal challenge.

19. The council does not support the proposal to amend the definition of gypsies and travellers, and travelling showpeople, as proposed. Gypsies and travellers are classified as a minority group and their culture and overall lifestyle makes them and their needs different to the settled population in a number of ways, not just because they travel.

20. Although the Equality Act 2010 does not define race, case law has established that Roma Gypsies and Irish Travellers are covered by the protected characteristic of race for the Act. This not only provides citizens with protection against discrimination but also impose duties on public authorities to promote equality and good race relations, and prevent discrimination. There is much evidence to suggest that the British travelling community experiences wide-ranging inequalities across a number of areas including access to health and education services and social care. Figures provided by the Equality and Human Rights Commission indicate a life expectancy 10 years lower than the national average, with similar inequality found amongst health and education outcomes. Understanding the barriers faced by Gypsy and Traveller communities is key to improving life outcomes and tackling ongoing inequality.

21. Amendment of the planning definition of travellers to exclude those who have permanently ceased to travel would inevitably lead to a reduction in need for specific accommodation for the travelling community, while also leading to an increase in numbers of this group living in 'bricks and mortar' housing alongside the settled community. The latter group may be less likely to have their specific needs addressed if living permanently in general market accommodation which could run counter to the objectives of the Equalities Act. This change may also lead to increased instances of unauthorised encampments, with potential negative impact on local authority resources and on community relations.

22. It may also be hard to apply the proposed policy in practice. There is no guidance of how to assess whether someone has ceased to travel 'temporarily' in the consultation document. This could create problems in terms of monitoring and enforcement, impact in a negative way on local authority resources, and have the potential for legal challenge.

Housing standards

23. The government recently conducted a 'Housing Standards Review' consultation from 12 September until 7 November 2014. This follows on from a previous consultation on Housing Standards carried out in 2013, which was reported to the Panel on 25 September 2013.

24. The 2014 consultation proposes detailed technical changes to a number of standards including space, access, water efficiency and security. The government is proposing through this review to transfer control of many standards relating to housing development from the planning process to the building control process. However it

does not propose that the new space standard is covered by the Building Regulations as it does not consider that there is a case for statutory regulation in this area. The government proposes a national space standard to replace the many existing space standards used by local authorities. This can be required by planning policies, where justified by need and subject to viability.

25. The council's key comments submitted to the government in response to this consultation are summarised below:

- The space standards in the soon to be adopted *Development management policies local plan* are largely in line with the proposed national space standards. This plan has been through extensive consultation and a local plan examination process. The council has commented, in response to the consultation, that it is critically important that councils with adopted local plans which include identical or very similar standards to those now proposed as national standards, and which have been thoroughly consulted on, assessed and confirmed as being appropriate by an examiner, do not have to repeat the whole exercise by a requirement to test viability.
- The government proposes introduction of an optional standard relating to water efficiency, requiring that water consumption per person occupying a new building should not exceed 105 litres per day (the Building regulations standard is 125 litres pppd). This standard is reflected in *Joint Core Strategy* policy 3 and is currently being implemented by the council. However the JCS intention to reduce consumption to 80 litres pppd on developments of over 500 dwellings by 2015 will not be able to be implemented if these changes are introduced.
- In response to a question about the adequacy of the government's proposed approach in ensuring compliance with the standards in order to address a clear and evidenced need, the council reiterated that there should be no need to require councils to repeat a further review exercise where they have adopted local plan policies which are the same or similar to national or optional standards. This would be wasteful for everyone including local authorities and the development industry, and unlikely to result in any material change to the currently adopted standards.

Sustainable drainage

26. The government recently conducted a consultation on 'Delivering Sustainable Drainage Systems', from 12 September to 24 October 2014. This sets out an alternative approach to the one envisaged in the Flood and Water Management Act 2010 which was to deliver effective sustainable urban drainage systems (SuDS) through a separate regulatory process to the planning system. The purpose of this consultation is to seek views on delivering sustainable drainage systems through changes to the current planning regime.

27. The council's comments were submitted to government in late October. The key elements of the council's response are summarised as follows:

- The key issue is ensuring the deliverability of long term maintenance of SuDS. The government's proposal to create a new role for planning authorities in relation to SuDS could fragment responsibility, create confusion for developers, and add costs to the public sector. A better approach would be amend the Building Regulations to ensure that SuDS drainage is checked pre-commencement and is properly implemented in the same way as other drainage matters.

- There are no specialist skills at district level in Norwich so the proposals would be reliant on expert advice being available to the local planning authority. This could be provided by the county council as Lead Local Flood Authority. Procuring independent advice would be very costly and time-consuming for the LPA.
- There are concerns about the practicality of applying SuDS to all major development (ie conversions as well as new build) which may include viability issues. A phased introduction would be preferred.

Report to	Sustainable development panel	**Item**
	26 November 2014	
Report of	Head of planning service	5
Subject	Main Town Centre Uses and Retail Frontages Supplementary Planning Document – Feedback from consultation	

Purpose

This report is about the *Main town centre uses and retail frontages supplementary planning document* (SPD), which the panel considered and commented on before it was published as a draft for consultation in July. The report outlines the main issues raised in responses to consultation, summarises the responses received and proposes a number of generally minor amendments to the document to address those responses. Members are asked to recommend the amended SPD to Cabinet for approval in December prior to its formal adoption.

Recommendation

(1) To note the *Main town centre uses and retail frontages supplementary planning document* with proposed amendments

(2) To recommend that Cabinet approves the document as amended for formal adoption as a local development document in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 (as modified) and the relevant regulations.

Corporate and service priorities

The report helps to meet the corporate priority A prosperous city and the service plan priority to implement the local plan for the city.

Financial implications

None

Ward/s: The SPD will implement planning policy specific to the city centre, taking in parts of Mancroft, Thorpe Hamlet and Town Close wards

Cabinet member: Councillor Stonard – Environment and transport

Contact officers

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Background documents

None

Report

Introduction

1. This report presents the response to recent consultation on the *Main town centre uses and retail frontages supplementary planning document* (SPD) reported to the July meeting of the panel. The SPD provides essential detail to implement emerging policy DM20 of the *Development management policies local plan* which is expected to be adopted in early December. Policy DM20 sets out criteria for the assessment of planning applications for changes of use in the defined retail areas and retail frontages within the city centre – these being the primary area, secondary areas and the large district centres of Magdalen Street/Anglia Square and Riverside.

2. The policy background to and purpose of the SPD is described in more detail in the report to panel dated 23 July 2014. Broadly, it provides additional guidance to inform planning decisions about changes of use within the various different shopping areas within the city centre, including the defined retail frontages identified on the local plan policies map for specific protection and retention of a specific proportion of shopping.

3. Members should note that the SPD interprets a policy in a local plan which has been subject to independent examination and found sound, but is not yet formally adopted (i.e. policy DM20 of the emerging *Development management policies local plan*). Therefore, the SPD cannot be adopted and used in planning decisions until the local plan itself officially comes into force.

4. It should be noted that procedurally, a full council resolution is not necessary in order to adopt an SPD. This is because SPD does not involve a substantive change in the council's policy approach; rather, it is intended to supplement and update a policy already agreed .

5. For Policy DM20 to be fully effective, the SPD that supports it needs to be adopted either concurrently with, or as soon as possible after the formal adoption of the "parent" local plan. Accordingly, subject to your agreement, the SPD would be reported to Cabinet for approval on 10 December. This timescale would be shortly after the anticipated adoption date of the local plan at the beginning of December, assuming that council resolves to adopt the plan at their meeting on 25 November.

6. The draft document (with amendments to address comments made in response to the consultation) is attached as Appendix 1. The detailed comments received, with the council's response, are attached as Appendix 2.

The consultation

7. The Main Town Centre Uses and Retail Frontages SPD was published in draft on the council's website on 28 July 2014. Copies of the document were made available for inspection at City Hall and the Forum. The period of consultation ran for six weeks until 8 September. This is in accordance with the adopted Statement of Community Involvement, which states that the normal statutory consultation period for planning documents (four weeks minimum in the case of SPD) will be extended by two weeks where it occurs during holiday periods and over Christmas.

8. A range of city centre retail and business interests, residents and traders associations and local amenity groups were consulted directly by letter and email, with the major

store operators consulted via the Norwich BID. The direct mailing was supported by a city council press release and a main feature in the local press on 13 August 2014 ("*Blueprint for a thriving high street: how your city centre is set to get a major makeover*") which had generally positive reaction from the general public.

Issues raised in the consultation response

9. Perhaps owing to the detailed technical nature of the guidance, the response to the consultation was fairly limited. However it did include a collective response from Norwich Business Improvement District (BID) members representatives, containing a number of useful suggestions for change. Comments were also received from Broadland District and Norfolk County Councils as well as from various individuals and agents.

10. Points raised included:

- The SPD should cover issues about the appropriate scale of new development in district and local centres as well as addressing change in the city centre. *(The issue of managing the scale and impact of new development is in fact already covered in Appendix 4 of the development management policies local plan and addressed by a separate policy in that plan: DM18).*

- More guidance is needed in the SPD on the scope for subdivision of shops; also the retail offer in St Stephens Street and Westlegate should not necessarily be predicated on concentrating the majority of shopping in St Stephens.

- More evidence would be useful on how the thresholds for the indicative minimum proportion of shopping to be sought in each zone have been determined.

- The SPD needs to have regard to the government's latest proposals for further planning deregulation of high street uses (for example reducing the need for planning permission for many changes of use to restaurants and cafes) as set out in the recent *Technical Consultation on Planning*. These proposals could significantly undermine the ability of the SPD to protect the retail function of shopping areas. .

- More emphasis is needed on promoting housing in secondary shopping areas, particularly at ground floor level where vacancy levels are high.

- The SPD should be neutral about the issue of promoting new housing in Elm Hill at the expense of commercial uses (*the draft discourages housing at ground floor level in favour of supporting retail, commercial and evening economy uses which are seen as important contributors to the appeal of Elm Hill for visitors*).

- More encouragement is needed in the SPD for the introduction of visitor accommodation as a means of reusing the redundant space above shops

- The SPD should emphasise Norwich BID's aspiration to secure prestige "high end" retailing in London Street and elsewhere.

- The SPD should acknowledge the scope for more arts and cultural facilities in Norwich, with a specific suggestion of a symphony hall in Castle Mall.

11. Two individual responses were general criticisms of how the council's retail planning policy decisions in the past had allegedly disregarded or harmed business or personal interests, but contained no constructive comment on the document itself.

12. Whilst very positive and encouraging, the press coverage (and some responses to it) may have given the impression that the SPD and the planning system would have much more power to influence change in the city centre shopping areas than would actually be the case. Because shops are grouped into the same planning use class (A1) in law, no planning permission is needed to change one type of shop to another. Consequently, as noted in the previous report, the SPD would not be able to influence what *kinds* of shops would be accepted in specified areas of the centre, but would only be able to inform decisions about the relative balance between shops and non-retail uses such as banks, cafes and restaurants, as well as giving guidance on appropriate locations for housing and new uses in upper floors.

Proposed changes from the draft SPD

13. The changes proposed in the document are generally minor. Further commentary is added on how the frontage zone boundaries have changed from the previous definitions in the 2004 local plan and clarifications and corrections have been made to the guidance for specific areas in response to the comments received. The aspiration of Norwich BID to promote London Street for high quality prestige retailing is supported, although it is recognised that this could not be delivered through planning powers. The use of redundant floorspace in upper floors for visitor and holiday accommodation is also an idea which has merit and a reference is added to this in the text. In those frontage zones where housing is actively promoted, the SPD now makes clear that acceptance would be conditional on residential conversion proposals complying with other relevant policies of the adopted local plan: this would mean that the conversion of shops at ground floor level could be supported in cases where satisfactory standards of amenity, design and layout could be achieved and the retail function of shopping streets was not compromised.

Implications for this SPD of current and proposed national planning deregulation

14. Members will be aware from previous reports that the government has already introduced a number of reforms to permitted development rights in the General Permitted Development Order which enable many changes of use of premises in shopping areas to be made without planning permission. The introduction in 2013 of a prior notification procedure allowing the temporary use of premises for a variety of "flexible uses" for up to two years was viewed as potentially problematic for the city centre, but has resulted in relatively few cases where shops have changed use through this mechanism. Further reforms in April 2014 allow shops of less than 150 sq. m to change to banks, building societies and credit unions (referred to collectively in the regulations as "deposit takers") without planning permission, albeit that these rights do not apply in conservation areas, so the city centre is not affected. Similarly, smaller shops under this 150 sq.m size threshold can now be converted to individual dwellings or up to four flats without needing permission, but again these rights do not apply in the city centre as it is a conservation area.

15. The latest round of prospective reforms as set out in the government's *Technical Consultation on Planning* (reported to the panel in September) would further reduce the need for planning permission for changes of use in the high street, for example allowing the conversion of shops and other premises to cafés and restaurants under a

simplified prior approval process subject to no objections from immediate neighbours. More fundamentally, government proposals to combine the majority of financial and professional services such as banks and building societies into the same planning use class as shops would effectively change the definition in planning law of what a “retail use” is. Therefore the stipulations in the SPD requiring an indicative minimum proportion of “retail use” to be maintained would almost inevitably need to be reviewed. The result could be a significant erosion of available planning powers to resist harmful change, which would reduce the ability of this SPD and its parent local plan policy to protect the retail function of shopping areas in the city centre. Although some deregulatory changes could well be beneficial, much of the SPD could become superfluous as changes of shops to restaurants and cafes encouraged by the guidance might soon not need planning permission anyway. The harm that could result to the council’s strategy to protect and support the city centre has been highlighted as a significant issue in the council’s response to consultation.

16. At the present time however, neither the SPD nor the emerging local plan which it supports can anticipate what future changes to the General Permitted Development Order might look like, and must reflect the planning system and the powers available to the council to inform decision making as of now. It is likely that the next round of deregulation will be introduced through the publication of a consolidated revision to the General Permitted Development Order as early as April 2015, and at that time decisions would need to be made on appropriate policy responses. In the meantime the SPD would be applied, as intended, as a supplement to an adopted policy which has been demonstrated to be sound and appropriate.

Conclusions

17. As amended (and subject to approval by cabinet), officers are confident that this SPD will provide a sound basis for the future management of change in defined shopping frontages and other areas of the centre to maintain their vitality, viability and diversity in the long term. However it is evident that in a period of rapid legislative change there may be a need to review the document in the short term to ensure that it remains appropriate and enforceable.

Appendix 1

NORWICH
City Council

Norwich City Council Local Plan

Main Town Centres and Retail Frontages Supplementary Planning Document

Adopted version

December 2014

Summary

This supplementary planning document (SPD) supports and interprets policy DM20 of the Norwich Development Management Policies ~~DPD~~ local plan and policy 11 of the Greater Norwich Joint Core Strategy (JCS); both policies relating to the development, expansion and positive management of uses in Norwich city centre to achieve the most beneficial mix of uses to secure its continued vitality. ~~In particular~~, Policy DM20 implements one aspect of this strategy by seeking ~~seeks~~ to protect the retail function of key shopping streets:, ~~by~~ ensuring that shops continue to make up the majority of the primary shopping area, resisting the loss of retailing where possible and ~~ensuring that~~ aiming to maintain a minimum ~~the~~ proportion of street frontage devoted to shopping in each area ~~does not fall below a specified minimum level which would threaten~~ to protect its vitality and viability. The policy also encourages a range of beneficial supporting services such as cafés and restaurants contributing to the diversity and attractiveness of the city centre for residents and visitors.

The SPD includes a brief description of the character and function of different areas of the centre defined in the Development Management Policies ~~DPD~~ local plan and how these areas may evolve and develop in the future. It provides more detail on individual "frontage zones" within the primary retail area and each of the secondary shopping areas as well as the large district centres of Magdalen Street/Anglia Square and Riverside. For most areas it provides a guideline figure for the minimum proportion of frontage in A1 retail use considered appropriate to maintain vitality, viability and retail function in each zone. These indicative minima will be used in assessing and determining planning applications for change of use under policy DM20.

It also takes account of advice in national planning policy and practice guidance on ensuring the vitality of town centres, providing local guidance on the policy approach to temporary flexible uses and the impact of particular non-retail uses (including residential uses) within shopping streets.

1. Introduction

1.1 National planning policy in the National Planning Policy Framework (NPPF) requires local authorities to *plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work*. In particular they should:

- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;*
- *define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.*

1.2 For many years, as part of its planning strategy for shopping generally and the city centre in particular, Norwich City Council has successfully implemented a suite of planning policies to ~~proactively manage changes of use~~ facilitate beneficial new development and change in city centre shopping areas. This generally successful policy approach ~~aims~~ helps to protect the viability of shopping areas and support the retail function of key shopping streets by safeguarding against the loss of shops whilst encouraging vitality and diversity in secondary and specialist shopping areas. Such an approach is fully in accordance with the support for town centres in national policy and implements policy 11 of the Joint Core Strategy for Norwich, Broadland and South Norfolk. Policy 11 makes provision for:

- *expanding the use of the city centre to all, in particular the early evening economy and extending leisure and hospitality uses across the city centre, with late night activities focussed in identified areas;*
- *enhancing its retail function, providing for a substantial expansion of comparison retail floorspace of varied types and size of unit to provide a range of premises. This will be achieved through intensification of uses in the primary retail area and if necessary through its expansion; other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets.*

1.3 It is acknowledged that despite significant planned housing and population growth in greater Norwich, a substantial expansion of comparison retailing in the city centre envisaged in JCS Policy 11 is less likely given the changing role of the high street, the move to online retailing and the continuing trend toward downsizing of town centre property portfolios, especially among the major retailers. The health of the city centre in future is more likely to rest in successfully adapting to change and allowing for a greater diversity of uses. ~~The JCS recognises~~ this by acknowledging the increasingly important role of leisure and early evening economy uses in Norwich city centre and the need to support its vitality, diversity and attractiveness. Whilst emerging policy provides the general parameters for managing change through the planning process, local policies and supplementary guidance are able to give further advice on qualitative issues, such as the contribution that specialist retailing and evening economy uses may make to particular areas of the centre and the considerations that will be important in the council's decision making process when assessing individual proposals for change of use and new development.

2. Local policy background

2.1 The council remains committed to a strong, vibrant and competitive city centre for the foreseeable future. However, the nature of the shopping experience and the role of the "high street", in Norwich as elsewhere, is rapidly changing with the growth of online shopping and the contraction of the retail sector in town and city centres, as noted above. In spite of this national shift in shopping patterns, Norwich remains a thriving, vibrant and diverse regional shopping destination with a broad and distinctive retail offer and strong visitor appeal. As such, the city has been very successful up to now in resisting the retail decline which has affected many towns and cities in the UK, remaining for most of the past decade in the top ten retail destinations nationally. ~~This has been due in no small part to~~ One of many factors contributing to this success has been a positive and proactive ~~retail planning strategy~~ approach to planning and economic development which has encouraged new shopping development in the city centre, prevented the wholesale exodus of shops and supported environmental improvements such as the refurbishment of Norwich Provision Market and enhancement and promotion of speciality and independent shopping in the Norwich Lanes. Secondary shopping areas and large district centres such as Magdalen Street have undergone something of a renaissance more recently with the introduction of numerous speciality shops, cafés and other businesses serving the needs of a diverse and growing ethnic population.

The Development Management Policies Local Plan

2.2 The adopted Development Management Policies Local Plan (known as the *DM Policies* Plan) builds on the successful approach of previous local plans to ensure that the city centre continues to thrive as a successful shopping and visitor destination in a period of rapid change. It includes locally specific policies to ensure that development and investment for retail and other main town centre uses is positively managed and directed to achieve maximum benefits for the city centre, taking account of the overall strategy for the centre in JCS policy 11 and the requirement to ensure the vitality of town centres in the NPPF.

2.3 Policy DM20 of the ~~Development Management~~ DM Policies Plan, which this SPD supports, is the successor to policies SHO10 and SHO11 in the City of Norwich Replacement Local Plan 2004. It takes the same general approach as the previous Local Plan in identifying individual frontage zones in the city centre within which the proportion of A1 retail use (shops) is assessed and monitored. The zones may be either self-contained areas (as with most of the secondary shopping area) or sub-areas within the primary shopping area. Most, but not all, of the frontage zones have defined retail frontages (streets or sections of street) where it is important to maintain a proportion of retail use at ground floor level to promote an attractive and vibrant shopping experience for shoppers and visitors. The policy approach seeks to resist ground floor uses with "dead frontages" which will detract from the attractiveness and vitality of the area, while encouraging beneficial uses in upper floors and basements. Some of the defined frontages and zone boundaries have changed in comparison with the 2004 plan to reflect new development and change in the character and function of different parts of the centre. The new policy also accepts main town centre uses as defined in national policy, subject to their impact on vitality and viability.

2.4 This policy approach to management of uses is a longstanding one. Although the detailed boundaries of these zones have been redrawn and/or simplified periodically, the approach remains focused on small areas, allowing for each part of the Primary Area (and other parts of the central shopping area) to maintain its distinct character, retail diversity and functional coherence, without potentially harmful concentrations of non-retail uses being allowed to develop in any one location. <u>The main changes in the definition of frontage zones between the current and previous local plans are shown in paragraph 3.8 below.</u>

2.5 Policy DM20 is reproduced in Appendix 1. In relation to frontage zones it states:

Within the defined primary and secondary retail areas and Large District centres, non-retail uses in classes A2, A3, A4, A5 and other main town centre uses will be permitted where:

a) they would not have a harmful impact on the vitality and viability of the area and on the individual street; and

b) within retail frontages defined on the Policies Map, ***where they would not result in the proportion of A1 retail uses at ground floor level falling below an indicative minimum proportion which is justified as necessary to support the continued retail function of that frontage zone****.*

The indicative minimum thresholds used in support of this policy will be set out in a supplementary planning document and will be reviewed flexibly as necessary in response to objective evidence of retail market trends and changes in the character and function of the central shopping area over the plan period.

2.6 The advantage of setting out these thresholds in SPD, rather than specifying them in the body of the policy, is that SPD can be easily amended within the remainder of the plan period (to 2026) should any change in circumstances make this necessary, whereas reviewing the policy itself involves a more complex and lengthy procedure.

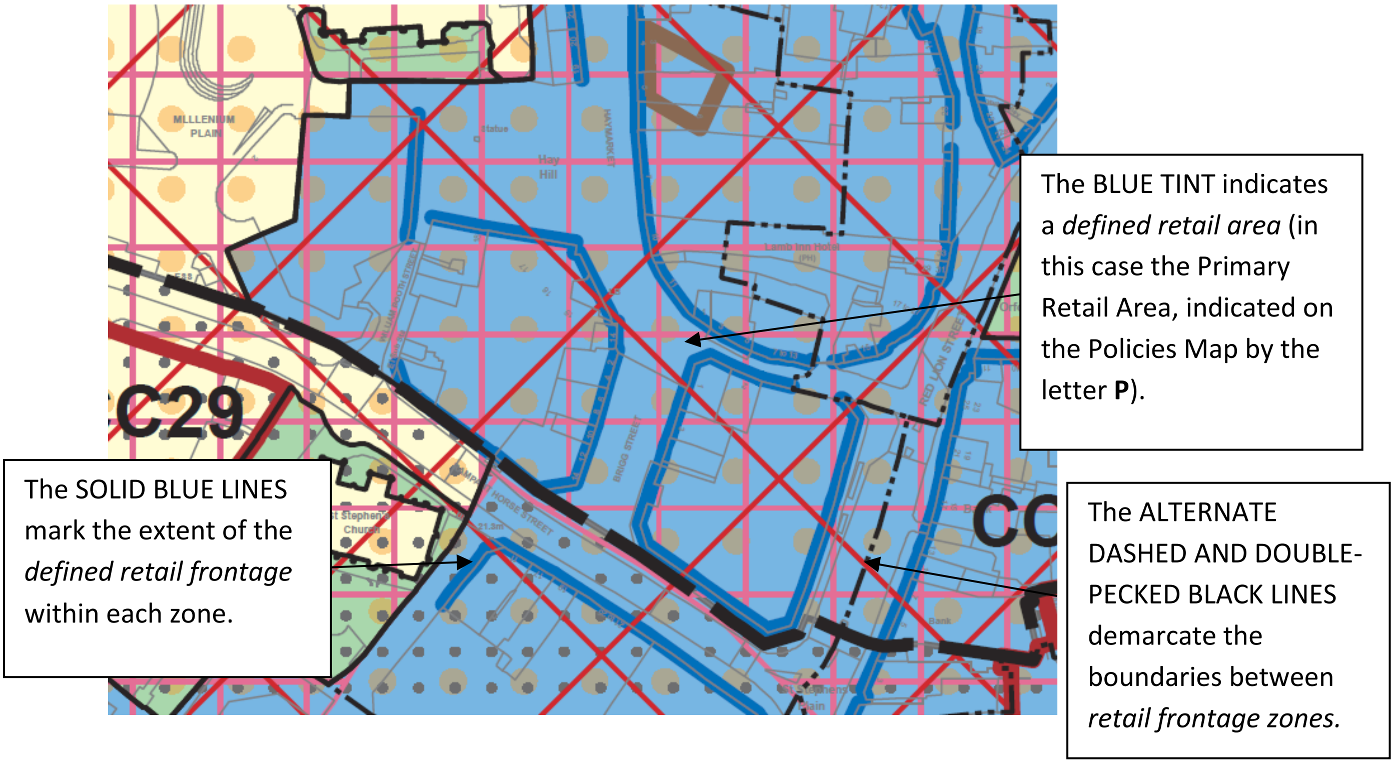
2.7 In preparing policy DM20, the council has been conscious of the rapidly evolving nature of the shopping experience, the diversification of and increased role of supporting services and leisure uses in the high street (such as cafés and restaurants) the growth of online shopping, which could eventually lead to a greatly reduced role for traditional high street retail formats, and the ongoing deregulation of the planning system by central government which seeks more flexibility to encourage greater use of underused and vacant premises. This is discussed in paragraph 20.6 of the DM Policies plan.

How is the proportion of retail use calculated?

2.8 To support local plan policy, maintain a record of new development and change over time and assist the local plan monitoring process, the city council maintains a database of shops and other uses within the city centre and local and district centres. The database derives from a city council audit of floorspace initially carried out in 1993 and updated regularly thereafter using information from on street surveys, planning application records and other commercial sources. City centre premises which are located within defined retail frontages shown by solid blue lines on the policies map are assigned a ground floor frontage length in metres, measured from a map base. Inactive frontages (blank walls with no shopfront, or separate entrances to upper floors and basements, are generally excluded). Premises which fall outside the defined frontages, and premises solely on upper floors or in basements, have a defined frontage length of zero. The total length of defined ground floor frontage can therefore be aggregated and the proportion of premises which are in A1 retail and non-retail use calculated for each zone. These figures form the basis of the analysis contained in the city council's regular retail monitoring reports.

2.9 In assessing the health of the city centre, the use of ground floor frontage length has been adopted as a basis for monitoring, rather than other indicators such as the amount of retail floorspace or the number of shop units as it is straightforward to monitor and provides a consistent basis to assess the vitality and viability of individual streets and areas. It is considered that it is the effect of the shop frontage presented to the street which has the most obvious impact on overall character, diversity and vitality. This being so, the indicative minimum percentage threshold for non-retail uses applied by policy DM20 is calculated on the basis of measured length of ground floor frontage, rather than any measure of internal retail floorspace.

Figure 1
Illustrative example of defined retail areas, retail frontages and retail frontage zones on the Norwich Local Plan Policies Map



Responding to changes in national policy

2.10 Although the requirement to support the vitality of town centres in the NPPF remains paramount, the direction of travel in national policy favours local policies which offer flexibility in the use of premises within town centres and suburban centres. Such a flexible approach helps to support economic regeneration, attract new uses and broaden consumer choice in centres which are perceived to be failing, helping to stem the often chronic decline in the shopping function of many towns and cities. Norwich has been generally resilient to the most recent economic downturn largely as a result of its very broad and distinctive retail offer and the historically successful application of strategic and local policies to proactively manage and promote the city centre.

2.11 Ongoing planning deregulation is likely to significantly influence the way changes of use are managed and assessed through this SPD, and in fact may change the definition of retail use itself. Provisions in the 2013 Use Classes Order already enable a wide range of smaller premises to be put into one of a number of temporary "flexible uses" for a period of two years, subject to prior notification of the proposed use to the city council, without requiring formal planning permission or affecting the lawful use of the premises as defined in the Town and Country Planning (Use Classes) Order. Uses currently falling within classes A1 (Retail), A2 (Financial and Professional Services), A3 (Restaurants/Cafes), A4

(Drinking Establishments), A5 (Hot Food Takeaways), B1 (Offices), D1 (Non-residential Institutions) and D2 (Assembly and Leisure) may change under these provisions to a use falling within either A1 (Retail), A2 (Financial and Professional Services), A3 (Restaurants/Cafes) and B1 (Offices).

2.12 To acknowledge these new provisions when applying policy DM20, the city council will need to determine proposals according to whether they result in the permanent loss of shops, taking account of the current lawful planning use of premises irrespective of any temporary flexible use which is occupying them. Thus (for example) premises with a lawful use as a shop (currently use class A1) but which are occupied on a two year temporary basis as a café will be deemed to be in A1 retail use. To assist in the monitoring of these temporary uses, the database also records the date the temporary use commenced and its intended end date.

2.13 In ~~August 2013~~ April 2014 the government ~~consulted on options for~~ introduced a further round of changes to the General Permitted Development Order. These ~~could~~ allow (for example) changes of use of smaller A1 retail or A2 financial and professional services premises to housing without the need for planning permission. ~~It is proposed that these~~ The provisions ~~would~~ do not apply in conservation areas, so in theory ~~would~~ will not directly affect the city centre, although in practice the likelihood is that refusal of permission for any such change within the centre would need to be based ~~solely~~ mainly on conservation reasons, (because a corresponding change outside a conservation area could be made without permission and in that case other factors, such as amenity or economic impacts could not be taken into account).

2.14 ~~Although no detailed response has yet been published on the results of the 2013 consultation, the government announced in April 2014 that it would consult on~~ As part of its more wide ranging Technical Consultation on Planning published in July 2014, the government has consulted on a number of further prospective changes to the General Permitted Development Order and Use Classes Order. ~~The further changes could~~ One of the changes proposed would bring banks ~~and~~ building societies and other financial and professional services (currently in ~~the Financial and Professional Services~~ planning use class A2) within the same class as retail shops (A1). ~~They could also see betting shops~~, Betting shops and pay day loan stores would however remain ~~which are currently~~ in a much reduced use class A2, ~~made a separate *sui generis* use,~~ meaning that planning permission would ~~always~~ be needed in most cases to establish a betting shop or change a betting shop to an alternative use. This prospective change responds to widespread concerns over the proliferation and perceived harmful impacts of betting shops on town centres and the lack of planning controls over them.

2.15 If the present legislative provisions for temporary uses are extended or the categorisation of different use classes should change permanently in law, the council's policy approach may need to be clarified through future reviews of this SPD. This will be particularly important if the definition of what constitutes a retail use is expanded to include uses such as banks, which are not currently regarded as retail.

3. Using this SPD

3.1 The rapid pace of change – both in legislation and on the ground – means that the council's approach to managing uses in the centre through the planning process using policy DM20 and this SPD needs to be flexible and responsive over the plan period. To this end the city council carries out regular ~~annual~~ health checks of the city centre shopping This allows the council to monitor how the primary and secondary areas are changing and developing over time, with the current occupancy, usage and shop type of each premises, its net floorspace and its ground floor frontage length (where applicable) recorded in a database. This enables reports to be generated for each individual zone of the central shopping area showing the proportion of each frontage zone in A1 retail use and non-retail use at any particular time, as well as other indicators such as the overall level of retail vacancy in different parts of the city centre, the split between convenience and comparison goods shopping and the different categories of shop within those groups. The city centre was last surveyed in April 2014.

3.2 Similar audits are undertaken for the suburban district and local centres outside the city centre, although these are not covered in this SPD. The council reports annually on the findings of these retail surveys through the Norwich city centre shopping floorspace monitor and local and district centres ~~retail~~ monitors. These reports can be found on the council's website on the Annual Monitoring Report page: http://www.norwich.gov.uk/Planning/PlanningPolicy/Pages/AnnualMonitoringReport.aspx

3.3 City centre shop surveys (and local and district centre surveys) are now normally undertaken annually, but could be more frequent if additional resources became available or if a particular issue meant that survey evidence had to be brought up to date urgently. The council would welcome opportunities for cooperation and collaboration with other agencies and city centre stakeholders to look into the possibility of surveying the centre more frequently.

3.4 The purpose of the SPD is to assist decision making by setting out

- the level of vacancy in defined ground floor frontages within each zone,
- the current split between retail and non-retail use in each defined frontage (where a defined frontage exists).
- the indicative minimum proportion of ground floor frontage which planning decisions should seek to maintain in each zone to ensure continued vitality and viability.

- Further guidance on how proposals for change will be assessed, including for those zones where no ground floor frontage is defined.

3.5 In the Primary area, frontage zones have been categorised into

- *core frontages* – the main pedestrian priority and pedestrian streets and the two purpose built malls where high street multiple stores, department stores and larger shops generally predominate, and

- *other frontages* which may be characterised by smaller shops, local independent and speciality retailers and supporting services such as cafes and restaurants, many of which are open into the evening. These include parts of the Norwich Lanes and the network of pedestrian streets between Gentlemans Walk and the Castle.

3.6 The secondary areas and large district centres vary in character ranging from historic shopping streets with particular retail specialisms to purpose built self-contained shopping areas such as Riverside Retail Park and the Sainsbury foodstore at Brazen Gate.

How have the policy thresholds been chosen?

3.7 In selecting the indicative minimum proportion of frontage to be maintained in A1 retail use in different zones (where one are specified), the council has taken a number of factors into account. These include: the relative significance of high street shopping in the zone concerned and its contribution to vitality and viability of the centre as a whole, recent changes in the character and function of zones (including the balance between retail and non-retail uses and supporting services) and the scope for flexibility and further diversification of uses, particularly in areas where vacancy rates are high.

3.8 <u>Figure 2 on page 13 shows a comparison between the primary area frontage zones as defined in the City of Norwich Replacement Local Plan 2004 and in the DM Policies Plan 2014. The main changes have been:</u>

- <u>Designation of Caste Mall, Chapelfield and the Gentlemans Walk area as *core frontage zones* where retaining a generally higher proportion of retail use is a priority;</u>

- <u>Reclassification of Riverside and Sainsbury’s Brazen Gate from primary retail areas to a large district centre and a secondary retail area respectively (this change is consistent with the hierarchy of centres in Policy 19 of the adopted JCS).</u>

- <u>Inclusion of Red Lion Street and Castle Meadow North as primary frontage zones or part zones (these were previously discrete areas where no specific limits on retail uses applied, resulting in some confusion in interpreting the previous local plan policy).</u>

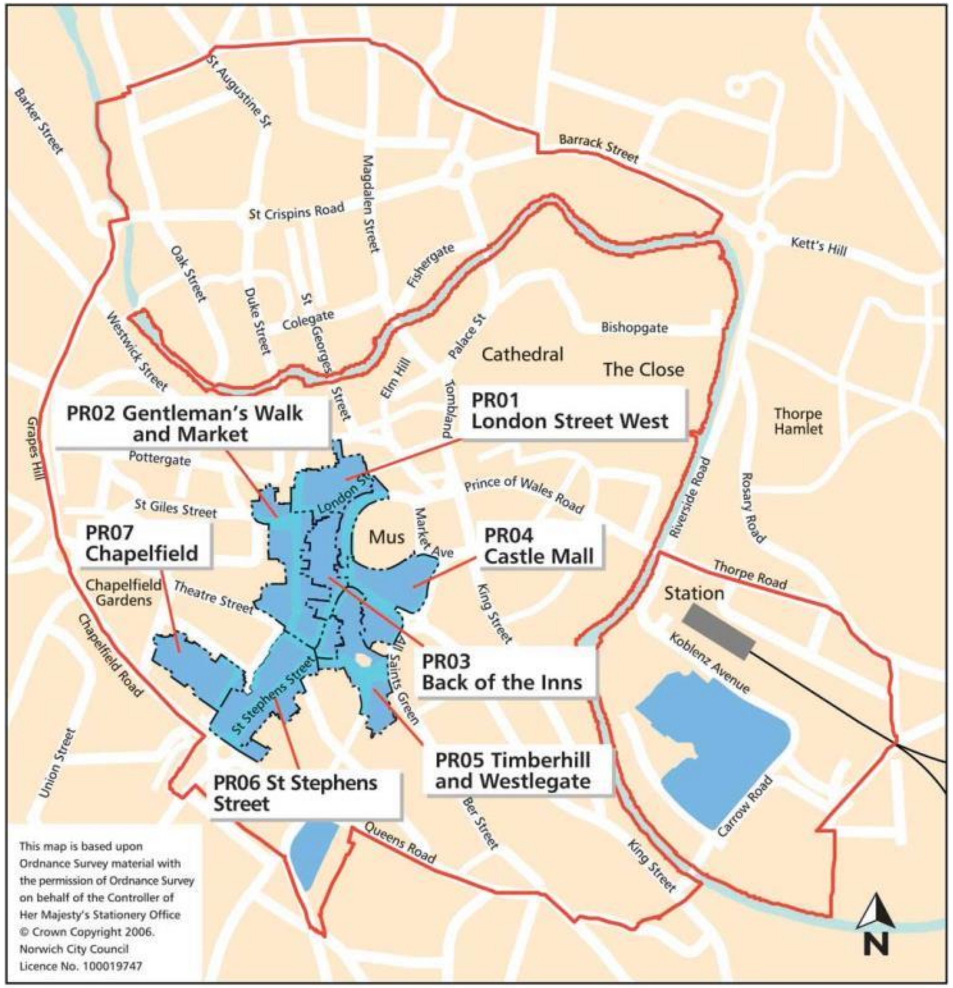
- Redefinition of zone boundaries in the Guildhall Hill and St Giles Street area to group these streets with the west end of London Street as The Lanes East. (The Pottergate/Lower Goat Lane area as defined in the Replacement Local Plan remains as a secondary shopping area with broadly the same boundaries as before but is renamed as The Lanes West).

- Redefinition of zone boundaries in the Westlegate and Timberhill area to group Westlegate and John Lewis at All Saints Green with St Stephens Street rather than being grouped with Timberhill. Timberhill is grouped instead with Red Lion Street.

- Extension of the primary shopping area to include Chapelfield Plain (under construction at the time of the 2004 local and premises at the north end of Ber Street.

3.9 For the core frontages of the Primary area the proportion of frontage which it is desirable to maintain in A1 retail use has been set as an indicative minimum of **80**%. This appears to be a relatively high benchmark but is lower than specified in previous local plan policies. It recognises the critical importance of shops in these zones but gives scope for further diversification. In Castle Mall and Chapelfield the defined retail frontages are confined to the main retail levels of the centres concerned with restaurants, cafes and other services on other levels which do not generally have defined frontages – consequently the proportion of shops in the defined frontages in these centres is expected to remain high by definition.

3.10 For other areas of the centre the indicative minima vary according to location and will allow for a more flexible and diverse range of uses to be introduced within ground floor premises to complement the shopping offer as these areas change and develop. The council would welcome comments on the thresholds chosen and in particular whether they are appropriate to protect the shopping function of different areas.



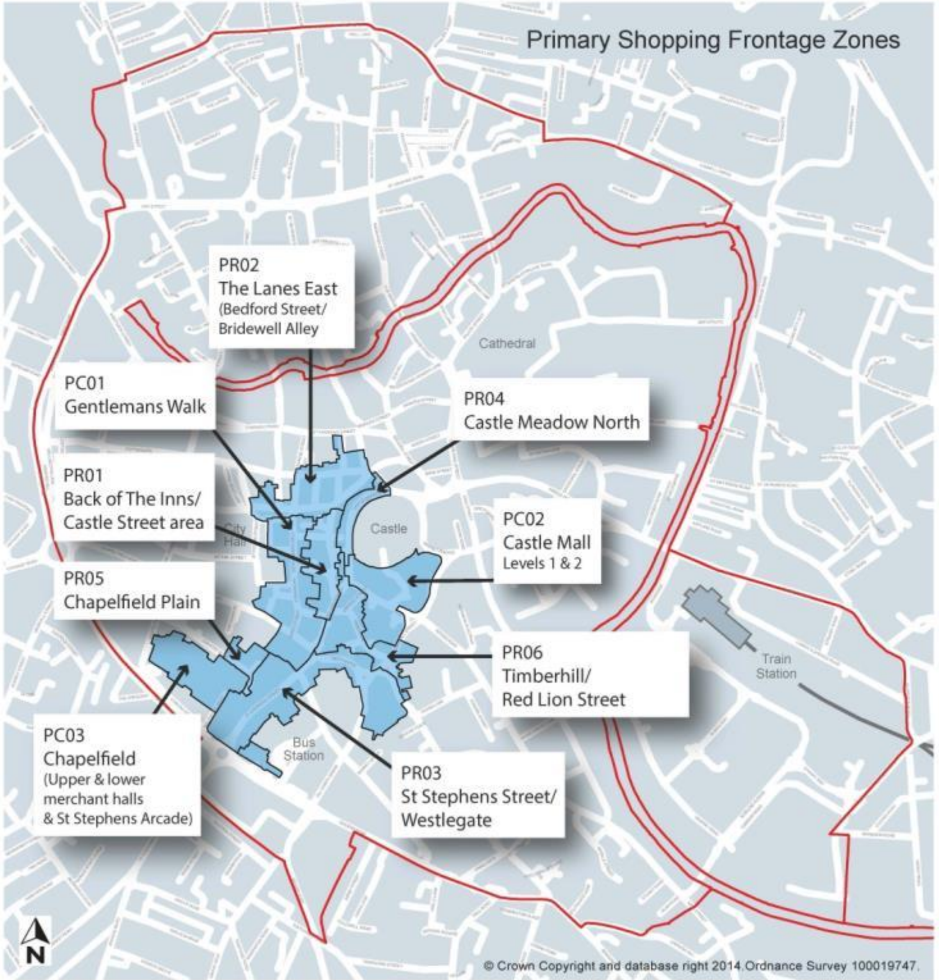


Figure 2

Primary area frontage zones as previously defined in the City of Norwich Replacement Local Plan 2004 (left) and currently in the Norwich Development Management Policies Local Plan (right)

4. Frontage Zone definitions

4.1 The following city centre frontage zones and large district centres are defined in the ~~Development Management~~ DM Policies plan and listed in Appendix 4 of the plan document. The boundaries of the each area and frontage zone are shown on the Policies Map but not named or labelled individually on the map. The reference numbers used in the plan reflect those used in the city council's shops database and in the City Centre Retail Monitor.

	Primary retail area core frontage zones
PC01	Gentlemans Walk/Haymarket/Brigg Street
PC02	Castle Mall (defined frontages on White Lion Street and Castle Meadow levels)
PC03	Chapelfield (defined frontages on lower/upper merchants hall levels)
	Frontage zones in the rest of the primary retail area
PR01	Back of the Inns/Castle Street area
PR02	The Lanes East (Bedford Street/Bridewell Alley area)
PR03	St Stephens Street/Westlegate
PR04	Castle Meadow north
PR05	Chapelfield Plain
PR06	Timberhill/Red Lion Street
	Secondary retail areas
SR01	The Lanes West (Pottergate/Dove Street/Lower Goat Lane area)
SR02	Upper St Giles
SR03	St Benedicts
SR04	Elm Hill
SR05	London Street (east)
SR06	Brazen Gate
	Large District Centres
LD01	Anglia Square, Magdalen Street and St Augustine's Street
LD02	Riverside

The Core Frontage Zones

PC01 – Gentlemans Walk/Haymarket/Brigg Street

These three historic streets together form the pedestrianised core of Norwich's primary shopping area. The area is attractive and busy during the day, characterised by:

- Large department and multiple stores with extensive frontages (Marks and Spencer, Debenhams, Primark, Next).
- High street chain and specialist retailers (W H Smith, HMV, Top Shop)
- A number of supporting services including two banks and several national chain coffee/sandwich shops and cafés.
- The 200-stall open Provision Market with a wide range of local independent retailers trading six days a week. The Provision Market, refurbished in 2005, is located within this zone but is not part of the defined retail frontage. Vacancies within the market have been increasing in recent years.

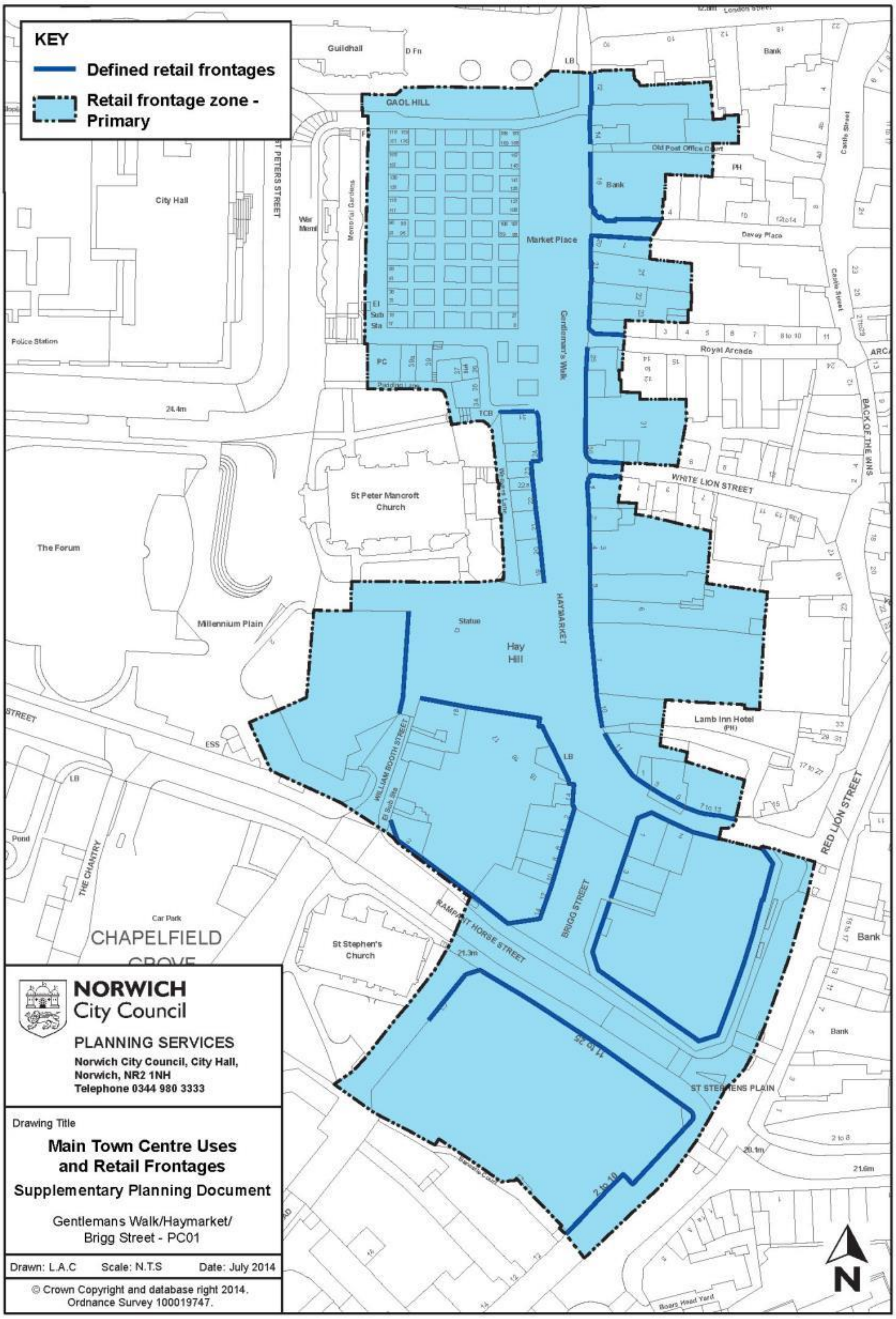
The Gentleman's Walk area has a high concentration of shopping floorspace and has been the main focus of traditional high street retailing in Norwich for many years, although activity in the evening is still fairly limited other than on late night shopping days (usually Thursday). This may be due to the dominance of larger retail premises which do not generally extend their opening hours beyond the early evening and which are not well suited to more flexible use. Vacancy is more persistent in smaller shop units which may struggle to attract retail tenants able to afford prime rents, thus there may be scope to accept a wider range of uses in smaller premises to support the evening economy. The presence of the Provision Market and large department and multiple stores, some of which have very extensive frontages, means that this part of the centre is likely to retain its important shopping role and key shopping attractions for residents and visitors and remain a focus of new retail investment and enhancement for the foreseeable future. Ongoing traffic management measures in the area are likely to reduce volumes of traffic and improve conditions for pedestrians in Rampant Horse Street and St Stephens Street in the early part of the plan period.

The survey of April 2014 showed the following analysis for frontages in core frontage zone PC01:

Percentage vacant units:	**8.5 percent**
Percentage vacant floorspace:	**1.9 percent**
Total length of defined retail frontage in this zone:	**872.9 metres**
Measured ground floor frontage retail/non retail split*:	**88.4 percent A1 retail frontage** **11.6 percent non retail frontage**

In order to maintain and support the vitality, viability and shopping character of zone **PC01**, decisions on planning applications for new development and change of use should seek to

- maintain an indicative minimum of **80%** of defined retail frontage in A1 retail use at ground floor level;
- seek to retain larger units of over 150 m2 in retail use but accept a broader range of uses in smaller premises at ground floor level, particularly where monitoring shows persistent concentrations of vacancy in small units both within and outside of defined frontages;
- extend the use of vacant and underused upper floors for a range of beneficial uses, especially cafés restaurants and bars supporting the evening economy, subject to other policies of the local plan. Residential uses will be supported where consistent with policies DM2, DM12 and DM13.
- Promote uses which increase public activity and pedestrian footfall in these areas in the early evening, and;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres).


KEY
Defined retail frontages
Retail frontage zone - Primary
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Gentlemans Walk/Haymarket/
Brigg Street - PC01
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
© Crown Copyright and database right 2014.
Ordnance Survey 100019747.
N
Guildhall
GAOL HILL
City Hall
Market Place
Gentleman's Walk
Old Post Office Court
Davey Place
Royal Arcade
WHITE LION STREET
St Peter Mancroft Church
The Forum
Millennium Plain
HAYMARKET
Hay Hill
Statue
Lamb Inn Hotel
WILLIAM BOOTH STREET
BRIGG STREET
RAMPANT HORSE STREET
St Stephen's Church
CHAPELFIELD
THE CHANTRY
Car Park
RED LION STREET
BACK OF THE INNS
Castle Street
ST STEPHENS PLAIN
Police Station
Bank

PC02 – Castle Mall

Castle Mall is the older of the two purpose built covered shopping centres within Norwich and was opened in 1993, the Vue Cinema being added later. Following its recent acquisition by Infrared Retail, a major programme of refurbishment is planned which is expected to redesign Level 4 of the mall (accessed from Timberhill) with a greater focus on cafés and restaurants, with a number of other internal and external works programmed throughout the scheme. External remodelling of the White Lion Street pedestrian entrance has already been approved but considerable potential remains to enhance the design of the development and improve its functional relationship with neighbouring areas. The refurbishment of Westlegate Tower for residential flats includes new commercial development on the Timberhill frontage and a new pedestrian link from Timberhill to Westlegate which should increase pedestrian activity in the area and will be of benefit to the Timberhill frontage of Castle Mall.

Defined retail frontages within Castle Mall are Level 1 (White Lion Street) and Level 2 (Castle Meadow). The shopping levels above this are focused mainly on restaurants, cafes and other non-retail uses and are not part of the defined retail frontage. The basement level currently occupied by TK Maxx is also excluded from the frontage definition.

The survey of April 2014 showed the following analysis for frontages in core frontage zone PC02:

Percentage vacant units:	**18.9 percent**
Percentage vacant floorspace:	**14.1 percent**
Total length of defined retail frontage in this zone:	**875.1 metres**
Measured frontages retail/non retail split (levels 1 and 2):	**95.6 percent A1 retail frontage** **4.4 percent non retail frontage**

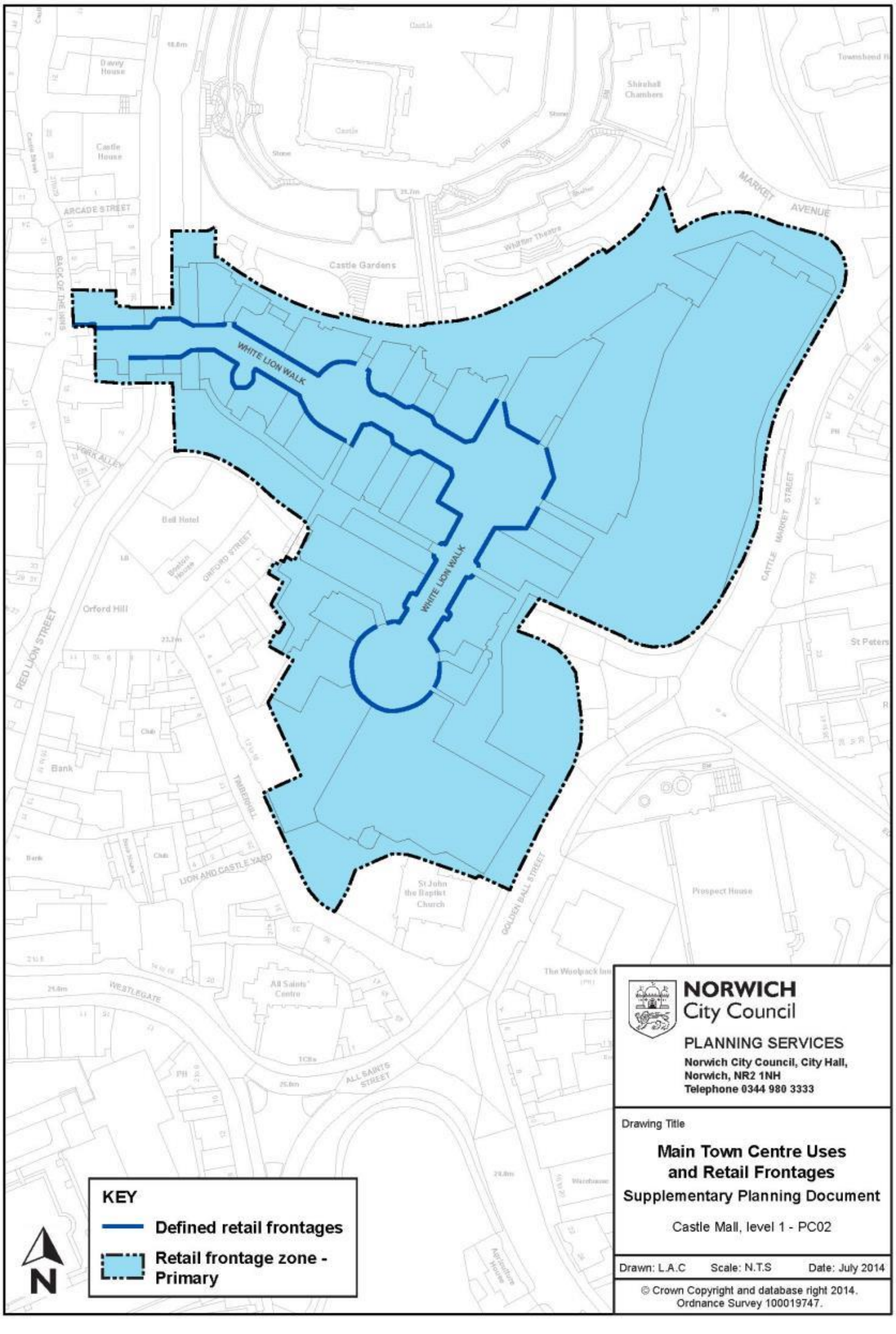
Currently, there is a relatively high proportion of vacant units within Castle Mall. The majority of empty units on the main retail levels were previously in use as shops. In the context of ongoing refurbishment and recent change of management of the development there may be scope to introduce more flexibility in the use of the main retail levels to increase occupancy although it is suggested that A1 retail use should remain the main focus.

In order to maintain and support the vitality, viability and shopping character of zone **PC02**, decisions on planning applications for new development and change of use will

- Seek to maintain an indicative minimum of **80%** of defined retail frontage in A1 retail use on Levels 1 and 2 of Castle Mall, which will allow for some further diversification of use where this can help to address long term vacancy or promote vitality;

- Support wider diversification of uses on other levels with more efficient and innovative use of public space;
- support the extended use of Level 4 (Timberhill) for early evening economy uses such as restaurants and cafés, <u>and for complementary leisure uses</u>;
- improve the functional relationship of the Mall with adjoining public areas, in particular St John's Plain and Castle Green, and;
- so far as reasonably practicable, retain existing community services that are accommodated in the Mall in accordance with DM policy DM22.

The council will continue to work closely with the Mall owners and managers to ensure that planned improvements to Castle Mall as a whole deliver maximum benefits for shoppers.


WHITE LION WALK
WHITE LION WALK
KEY
Defined retail frontages
Retail frontage zone - Primary
N
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall, Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
Castle Mall, level 1 - PC02
Drawn: L.A.C
Scale: N.T.S
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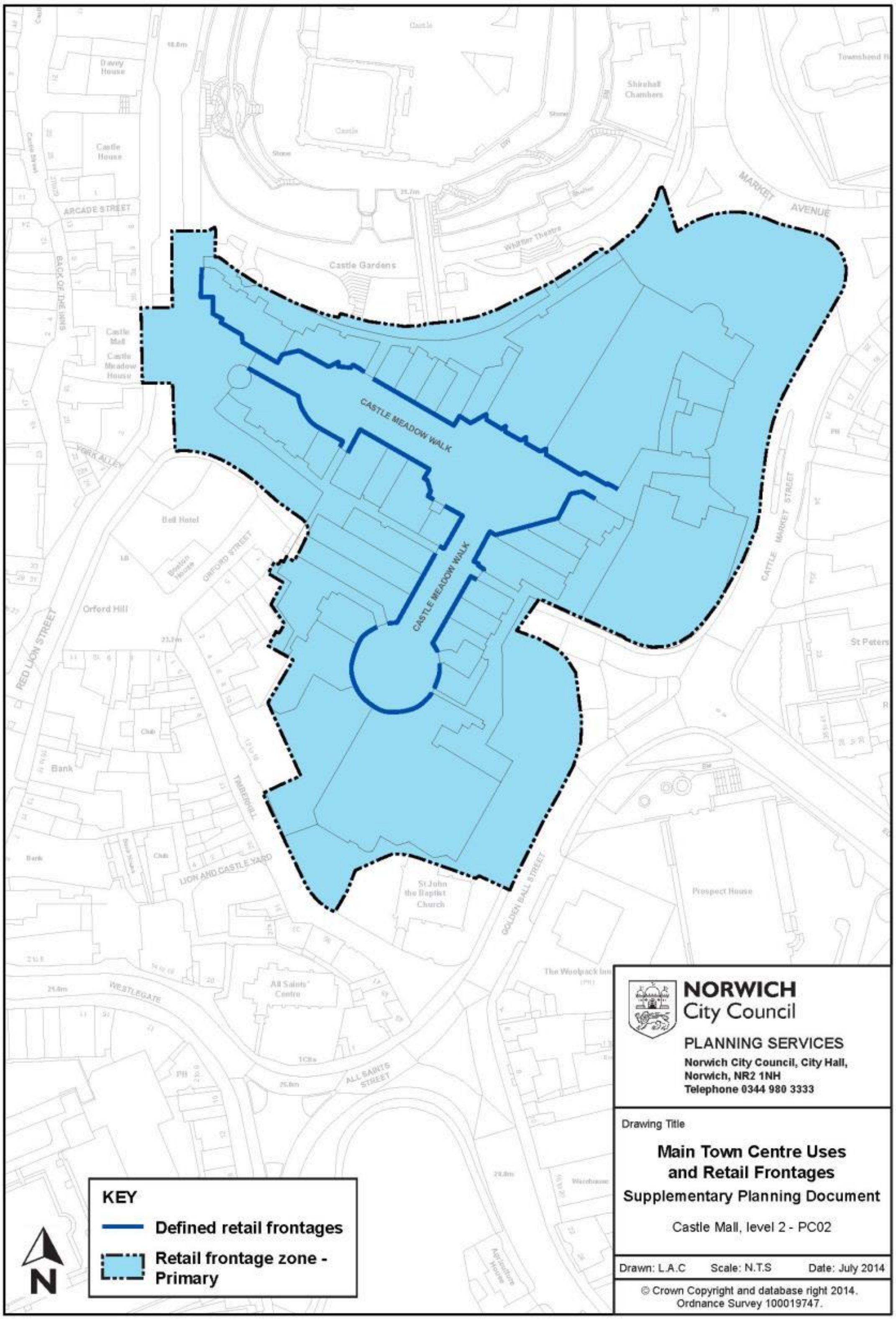
NORWICH
City Council
PLANNING SERVICES
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Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Castle Mall, level 2 - PC02
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KEY
Defined retail frontages
Retail frontage zone - Primary
N
CASTLE MEADOW WALK
CASTLE MEADOW WALK
MARKET AVENUE
ARCADE STREET
BACK OF THE INNS
RED LION STREET
YORK ALLEY
ORFORD STREET
Orford Hill
Bell Hotel
Castle Gardens
CATTLE MARKET STREET
GOLDEN BALL STREET
TIMBERHILL
LION AND CASTLE YARD
WESTLEGATE
ALL SAINTS STREET
St John the Baptist Church
Prospect House
The Woolpack Inn
All Saints' Centre
Castle Mall
Castle Meadow House
Castle House
Davey House
Shirehall Chambers
Castle
Bank
Club

PC03 – Chapelfield

Chapelfield is the newer of the two covered shopping malls in Norwich, dating from 2005. Owned and operated by Intu Properties, it accommodates a varied range of high street retailers and a separate food court (the Dining Terrace) on the top level.

Defined retail frontages within Chapelfield are (1) the lower shopping level accessed from St Stephens Street, comprising St Stephens Arcade and Lower Merchants Hall and (2) the upper shopping level accessed from Chantry Road, comprising the Crescent and Upper Merchants Hall. The top floor dining terrace is not part of the defined retail frontage. Chapelfield Plain, the open square to the north, forms a separate frontage zone (PR05) for the purposes of policy DM20.

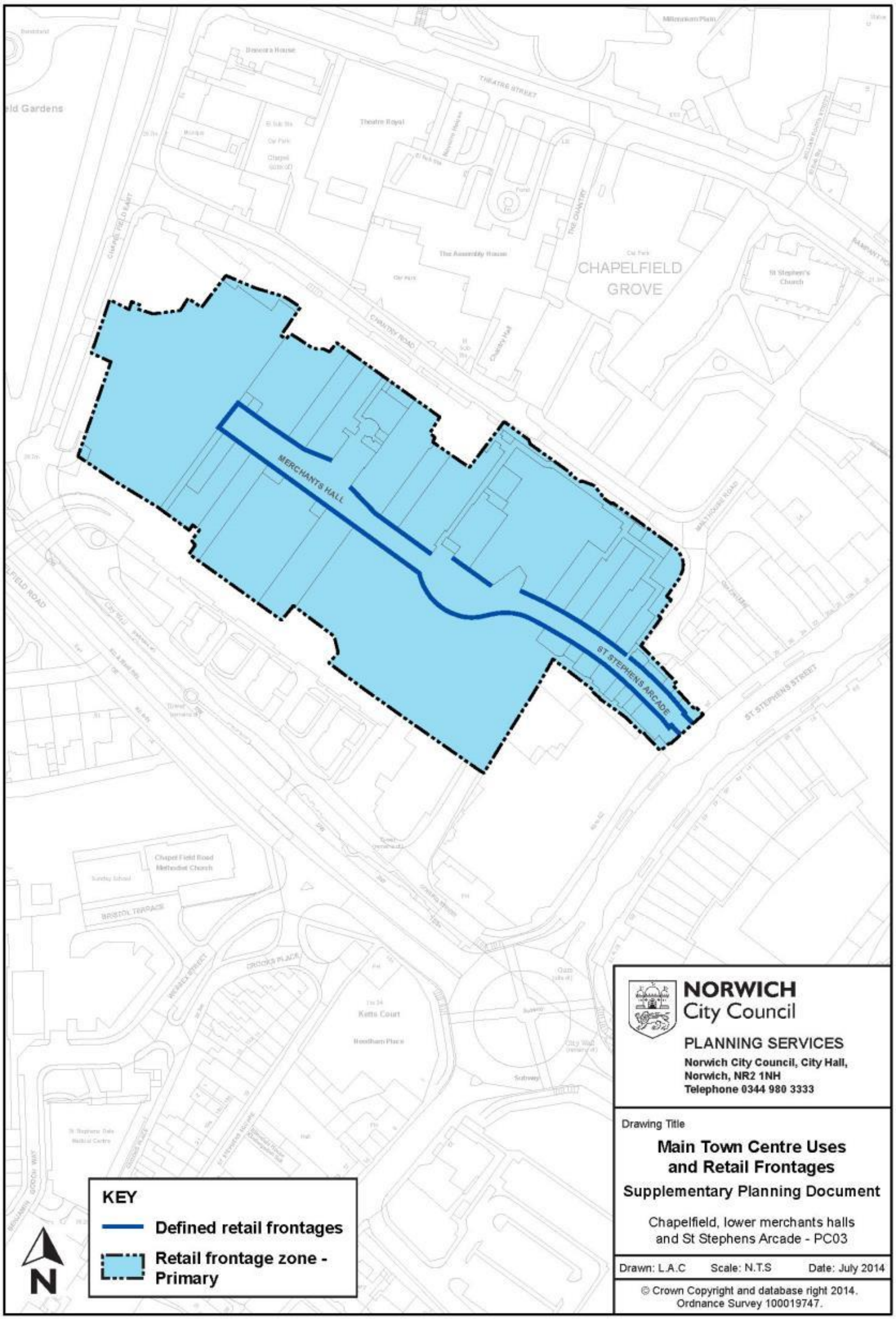
The survey of April 2014 showed the following analysis for frontages in core frontage zone PC03:

Percentage vacant units:	**12.3 percent**
Percentage vacant floorspace:	**3.9 percent**
Total length of defined retail frontage in this zone:	**686.0 metres**
Measured frontages retail/non retail split (levels 1 and 2):	**97.2 percent A1 retail frontage** **2.8 percent non retail frontage**

Within the main retail levels of Chapelfield, the vacancy rate is relatively low as a proportion of floorspace but is significantly higher when measured as a proportion of shop units. This would suggest that (as with Castle Mall) vacancies are concentrated in smaller units. In order to maintain and support the vitality, viability and shopping character of zone **PC03**, decisions on planning applications for new development and change of use should:

- seek to maintain an indicative minimum of **80%** of defined retail frontage in A1 retail use on the main retail levels of Chapelfield, which will allow for some further diversification of use in smaller units where this can help to address long term vacancy or promote vitality, and;
- Support further improvements to the internal layout and setting of Chapelfield which enhance its attractiveness and usability for shoppers.

The council will continue to work closely with Chapelfield's owners and managers to ensure that future improvements to the scheme will deliver maximum benefits for shoppers.


CHAPELFIELD
GROVE
MERCHANTS HALL
ST STEPHENS ARCADE
ST STEPHENS STREET
THEATRE STREET
CHANTRY ROAD
Theatre Royal
The Assembly House
St Stephen's Church
Chapel Field Road Methodist Church
BRISTOL TERRACE
CROOKS PLACE
Ketts Court
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
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Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Chapelfield, lower merchants halls
and St Stephens Arcade - PC03
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Scale: N.T.S
Date: July 2014
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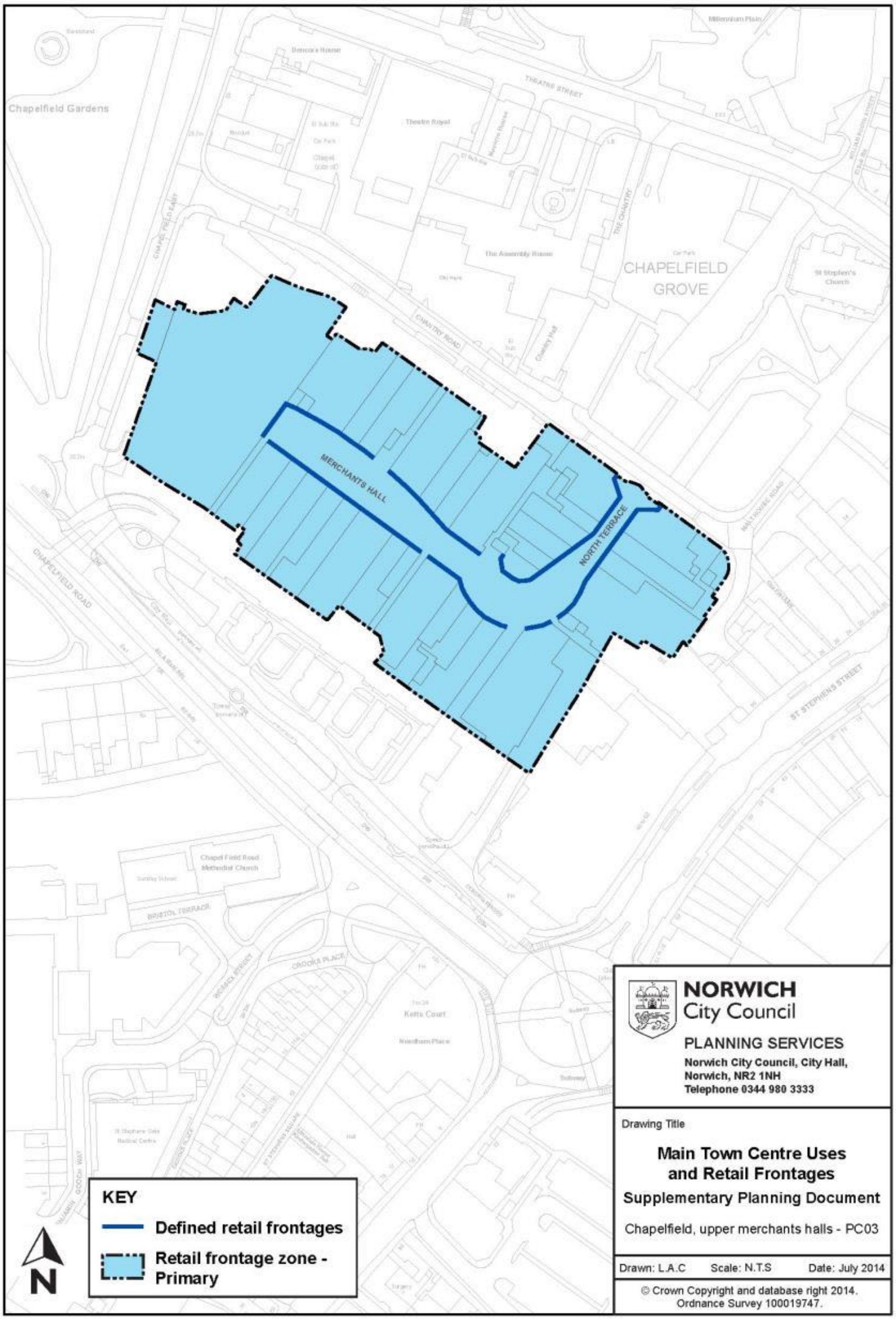
KEY
Defined retail frontages
Retail frontage zone -
Primary
N



CHAPELFIELD GROVE
MERCHANTS HALL
NORTH TERRACE
CHAPELFIELD ROAD
ST STEPHENS STREET
THEATRE STREET
CHANTRY ROAD
BRISTOL TERRACE
CROOKS PLACE
Chapelfield Gardens
KEY
Defined retail frontages
Retail frontage zone - Primary
N
NORWICH
City Council
PLANNING SERVICES
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Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Chapelfield, upper merchants halls - PC03
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Frontage Zones in the remainder of the primary area

PR01 – Back of the Inns/Castle Street area

This frontage zone covers the network of historic pedestrian streets between Gentleman's Walk and the Castle, including Back of the Inns, Castle Street, White Lion Street, the Royal Arcade and Davey Place. This part of the centre offers a varied range of speciality retailers (mainly in smaller units) and in recent years a number of other complementary services have been introduced such as Jamie's and Bill's Restaurants, the Virgin Money Store and Patisserie Valerie, adding to the vitality of the area and extending activity into the early evening. Vacancy rates are currently low and the area is well frequented by shoppers because of its position between two important attractions (the Castle and the Market Place) and the proximity of Castle Mall and speciality shopping in the Royal Arcade. It is considered that there is further potential to expand supporting services such as cafes and restaurants in this area and extend its use into the early evening, albeit that the introduction of pavement cafes would be unsuitable in some parts of the area where streets are narrow .

The survey of April 2014 showed the following analysis for frontages in core frontage zone PR01.

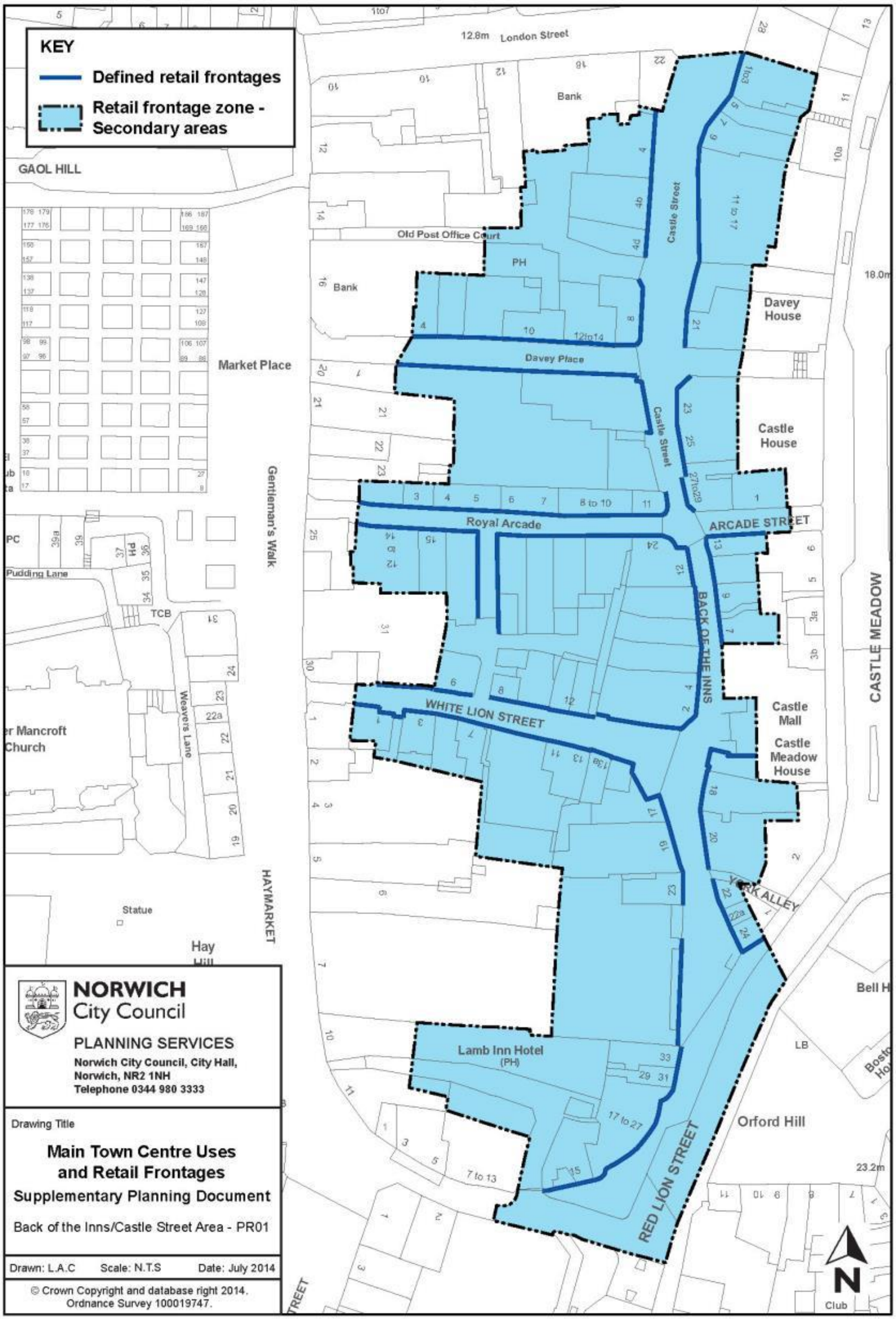
Percentage vacant units:	**5.6 percent**
Percentage vacant floorspace:	**4.4 percent**
Total length of defined retail frontage in this zone:	**729.6 metres**
Measured frontages retail/non retail split:	**71.9 percent A1 retail frontage** **28.1 percent non retail frontage**

In order to maintain and support the vitality, viability and shopping character of zone **PR01**, decisions on planning applications for new development and change of use will:

- Seek to maintain an indicative minimum of **65%** of defined retail frontage in A1 retail use, aiming to retain larger units with more extensive frontages in retail use but encouraging greater diversity in smaller units under 150 m2;
- give particular support to expanding evening economy uses such as cafés and restaurants throughout the area, including on upper floors, provided this can be achieved without restricting access for service vehicles or compromising pedestrian safety;
- Promote uses which increase public activity and pedestrian footfall in these areas in the early evening;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres), and;

- Support the further enhancement and improvement of the Royal Arcade and its historic setting.

To support this approach further enhancement of the public realm including (for example) enhanced paving and lighting would be beneficial particularly in those areas where paving schemes are becoming dated. There may be scope for developer funding for such initiatives ~~either~~ through the Community Infrastructure Levy (CIL) ~~or the Norwich Business Improvement District (BID) business rate levy~~.


KEY
Defined retail frontages
Retail frontage zone - Secondary areas
London Street
GAOL HILL
Market Place
Old Post Office Court
Bank
Castle Street
Davey Place
Davey House
Castle House
Gentleman's Walk
Royal Arcade
ARCADE STREET
BACK OF THE INNS
WHITE LION STREET
Castle Mall
Castle Meadow House
CASTLE MEADOW
YORK ALLEY
HAYMARKET
Weaver's Lane
Pudding Lane
Lamb Inn Hotel (PH)
RED LION STREET
Orford Hill
Statue
Hay Hill
NORWICH City Council
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Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
Back of the Inns/Castle Street Area - PR01
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N

PR02 – The Lanes East

The Norwich Lanes is a thriving area of great historic character and visitor appeal, emerging in recent years as a centre for speciality and local independent shops, cafes and restaurants and other community enterprises. The local plan does not treat the Lanes as a single entity for planning purposes, rather, the area extends across a number of separate frontage zones in the primary and secondary retail areas. In comparison with the 2004 Replacement Local Plan (which pre-dated the Lanes initiative) zone boundaries are now defined to better reflect the Norwich Lanes as a self-contained area and to identify the most important shopping streets within it. In applying policy DM20 decisions will need to consider the overall impact of changes of use on the Lanes as a whole as well as the impact on the zone concerned.

The "Lanes East" area comprises the network of historic, largely pedestrianised streets to the north and north-east of the Market Place including Bedford Street, the western part of London Street, Swan Lane, Bridewell Alley, St Andrews Hill and the southern end of Exchange Street. It forms the eastern half of the Norwich Lanes, an area characterised by speciality and local independent retailing in mainly historic smaller premises but including the large local independent department store of Jarrolds. Norwich BID is seeking to improve and enhance the retail offer in London Street by positioning it as a high quality prestige retailing area.

The area offers a relatively small number of other services supporting the evening economy such as pubs and restaurants, which in this zone are concentrated in the Bedford Street and Exchange Street areas. The Bridewell Museum and St Andrews Church and the nearby St Andrews Hall and Cinema City are important visitor and leisure attractions in the north of the area. Conversion of retail and office premises in Bridewell Alley and St Andrews Street for exhibition space and classrooms has recently been approved as part of the ongoing expansion of the nearby Norwich University of the Arts (NUA).

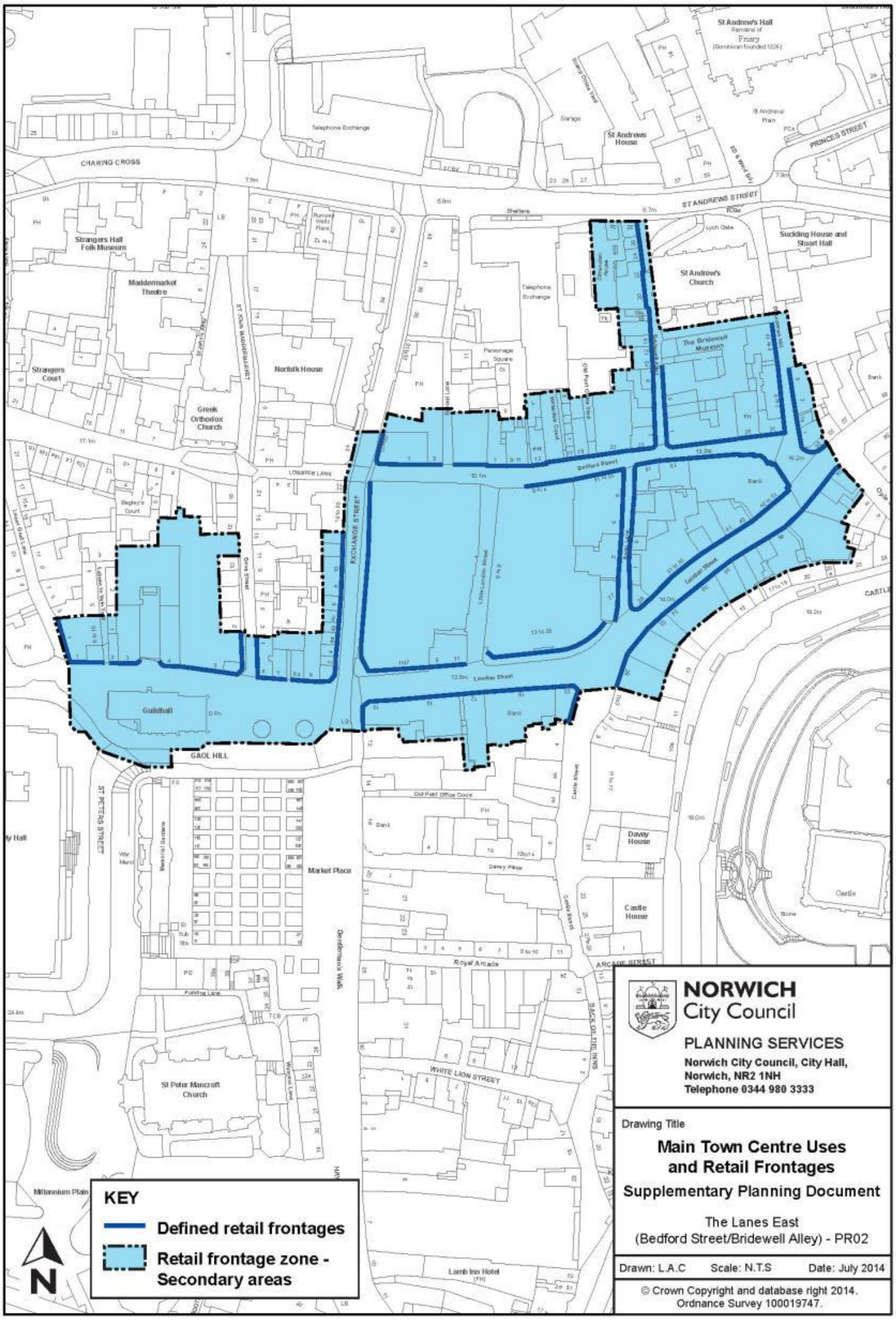
The survey of April 2014 showed the following analysis for frontages in core frontage zone PR02.

Percentage vacant units:	**5.2 percent**
Percentage vacant floorspace:	**1.0 percent**
Total length of defined retail frontage in this zone:	**1151.2 metres**
Measured frontages retail/non retail split:	**81.0 percent A1 retail frontage** **19.0 percent non retail frontage**

Shop vacancy rates in this zone are generally low. The focus of the area is expected to remain on speciality and independent shopping but there may be scope to introduce additional uses supporting the early evening economy and encourage complementary uses in upper floors, following the recent example of the Norwich Gym at Little London Street (housed in part of the former Habitat store). The expansion of the NUA should be of benefit to this area through greater pedestrian footfall and potentially greater activity in the early evening.

In order to maintain and support the vitality, viability and shopping character of zone **PR02**, decisions on planning applications for new development and change of use will

- Seek to maintain an indicative minimum of **70%** of defined retail frontage in A1 retail use;
- continue to support proposals for speciality and local independent retailing complementing the historic character and visitor appeal of the area, <u>including through promotion of prestige high quality retail especially in London Street</u>;
- support the further expansion of cafes and restaurants particularly in London Street and Bedford Street, where this can be achieved without harmful impact on historic character, ease of access for pedestrians or servicing requirements;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres), and;
- support complementary uses in upper floors, including further expansion of visitor accommodation and educational and leisure uses where appropriate and consistent with other local plan policies.


NORWICH
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Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
The Lanes East
(Bedford Street/Bridewell Alley) - PR02
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Date: July 2014
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KEY
Defined retail frontages
Retail frontage zone -
Secondary areas
N
CHARING CROSS
ST ANDREWS STREET
PRINCES STREET
Strangers Hall
Folk Museum
Maddermarket
Theatre
Norfolk House
Greek
Orthodox
Church
St Andrews
House
St Andrew's
Church
Sucking House and
Stuart Hall
Telephone Exchange
EXCHANGE STREET
Bedford Street
London Street
Guildhall
GAOL HILL
Market Place
ST PETERS STREET
St Peter Mancroft
Church
Royal Arcade
WHITE LION STREET
Davey
House
Castle
House
Castle
Lamb Inn Hotel
Millennium Plain

30

PR03 – St Stephens Street/Westlegate

This frontage zone comprises St Stephens Street and immediately adjoining areas (with the exception of Marks and Spencer), Westlegate, and the north end of All Saints Green taking in the extensive frontage to the flagship John Lewis store.

St Stephens was redeveloped in the 1950s and 1960s and is characterised mainly by larger shop units with a mix of high street multiples (BHS, W H Smith) and lower value budget retailers such as Poundland and Wilkinsons toward its south end where one of the main entrances to Chapelfield is also situated. St Stephens Street is one of two main stops for city bus services in the centre. Westlegate is the main pedestrian route linking St Stephens with John Lewis although the width of the footway is restricted and the shop units on its southern side are partly vacant. Surrey Street and Queens Road connect St Stephens Street with the Bus Station respectively at its northern and southern ends. Traffic management measures to be implemented ~~in the medium term~~ from November 2014 will restrict St Stephens Street and Surrey Street to buses, cycles and service access and introduce cycle priority measures in Surrey Street. In the longer term, it is proposed to remove through traffic from Westlegate altogether. This should significantly improve conditions for shoppers. The ~~ongoing~~ refurbishment of Westlegate House includes a direct pedestrian route from the north side of Westlegate to Timberhill which will improve linkages between the St Stephens area and Castle Mall.

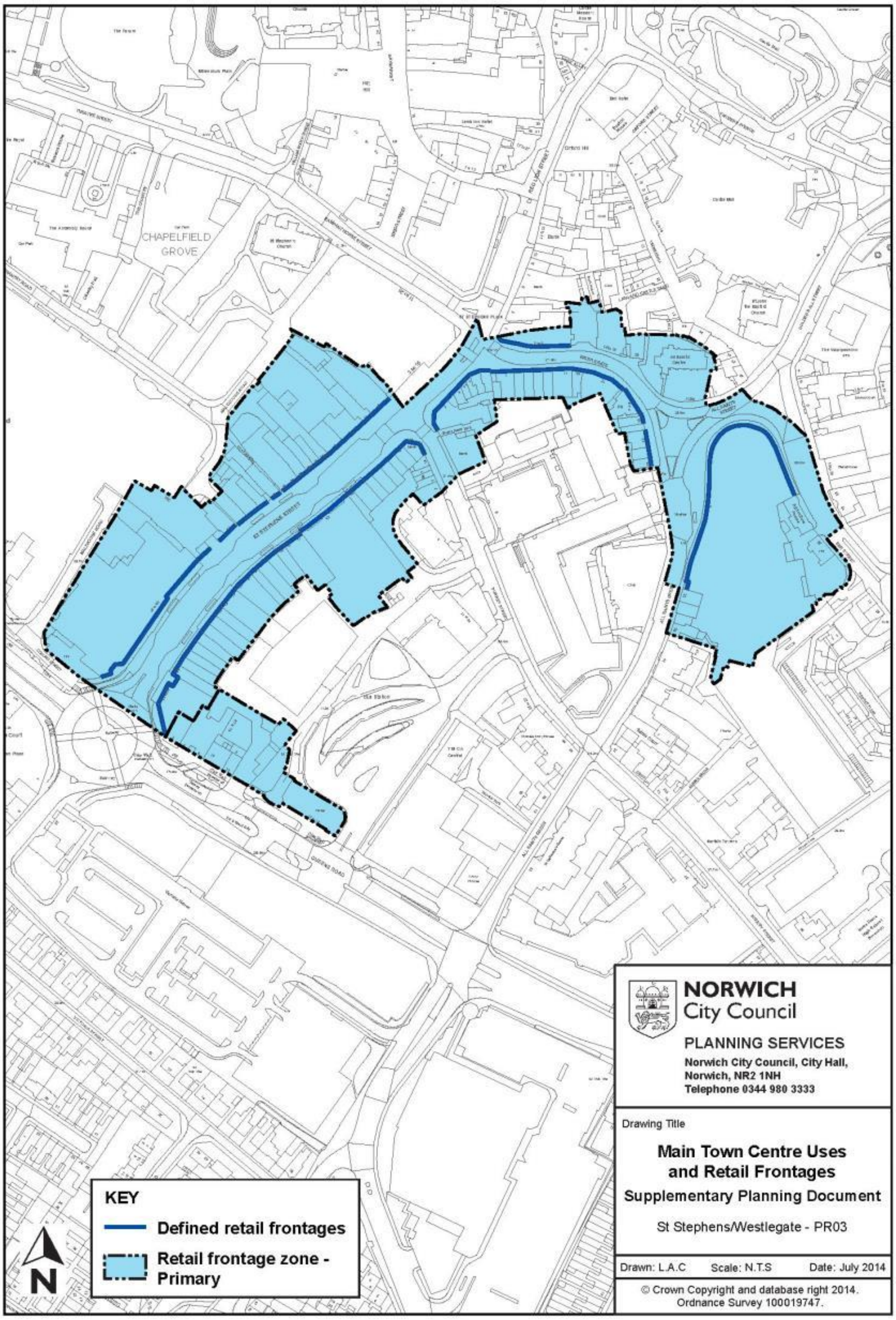
The survey of April 2014 showed the following analysis for frontages in core frontage zone PR03.

Percentage vacant units:	**15.6 percent**
Percentage vacant floorspace:	**2.1 percent**
Total length of defined retail frontage in this zone:	**822.4 metres**
Measured frontages retail/non retail split:	**85.2 percent A1 retail frontage**
	14.4 percent non retail frontage

Shop vacancy in this zone is very low in terms of floorspace but this is due to the presence of John Lewis and other retailers in very large units. St Stephens is expected to remain a major bus interchange, however as the area becomes more pedestrian friendly there may be opportunities for a more diverse range of services to complement its current focus on high street multiple and value retailers. The St Stephens Area Outline Masterplan proposes comprehensive redevelopment in the longer term. This is also promoted by policy CC31 of the Site Allocations Plan (as proposed to be modified) which also allows for incremental development and refurbishment of shop units on the east side of St Stephens Street in conjunction with re-use of upper floor offices, making provision for a potential direct pedestrian link to the Bus Station if this is technically feasible and viable.

In order to maintain and support the vitality, viability and shopping character of zone **PR03**, decisions on planning applications for new development and change of use will

- seek to maintain an indicative minimum of **80%** of defined retail frontage in A1 retail use, ~~focusing the majority of retailing in St Stephens Street~~;
- support refurbishment and reconfiguration of existing large unit shops throughout the area;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres);
- support (where feasible and viable) redevelopment of the 1960s shop premises on the east side of St Stephens Street in accordance with site allocations plan policy CC31, including the provision of improved pedestrian links to the Bus Station, and;
- support further diversification of uses in Westlegate (including cafes and restaurants making provision for outdoor seating) when reduction in traffic volumes and pedestrian priority measures make this practicable.


CHAPELFIELD GROVE
KEY
Defined retail frontages
Retail frontage zone - Primary
N
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
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Main Town Centre Uses
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Supplementary Planning Document
St Stephens/Westlegate - PR03
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PR04 – Castle Meadow North

This zone comprises the historic built frontage of Castle Meadow alongside the Castle Mound, running north of Arcade Street up to (and including) the south side of Opie Street. Castle Meadow is the second main stop for local bus services in the primary retail area and the traffic is restricted to buses, taxis and cycles: part of the “green transport spine” connecting Norwich rail station with the central shopping area. The zone is one of long term change with service uses - in particular financial and professional services uses, travel agents and cafés - complementing a range of speciality and value retailers. A number of larger premises have frontages to both Castle Meadow and either Castle Street or London Street.

As a somewhat transitional, mixed use street, consideration has been given in preparing the DM policies plan to redefining Castle Meadow as a secondary retail area. However its retention as part of the primary area is felt to be justified because of:

- its importance as a public transport hub;
- its position close to a main pedestrian entrance to Castle Mall and the major visitor attraction of the Castle and Castle Gardens;
- existing pedestrian routes and activity links to the important neighbouring shopping areas of London Street and Castle Street, and;
- the presence of national multiple retailers such as Boots and Waterstones.

However, to encourage greater flexibility of uses in future the plan does not define a retail frontage for Castle Meadow and this SPD does not require a minimum proportion of retail use to be maintained.

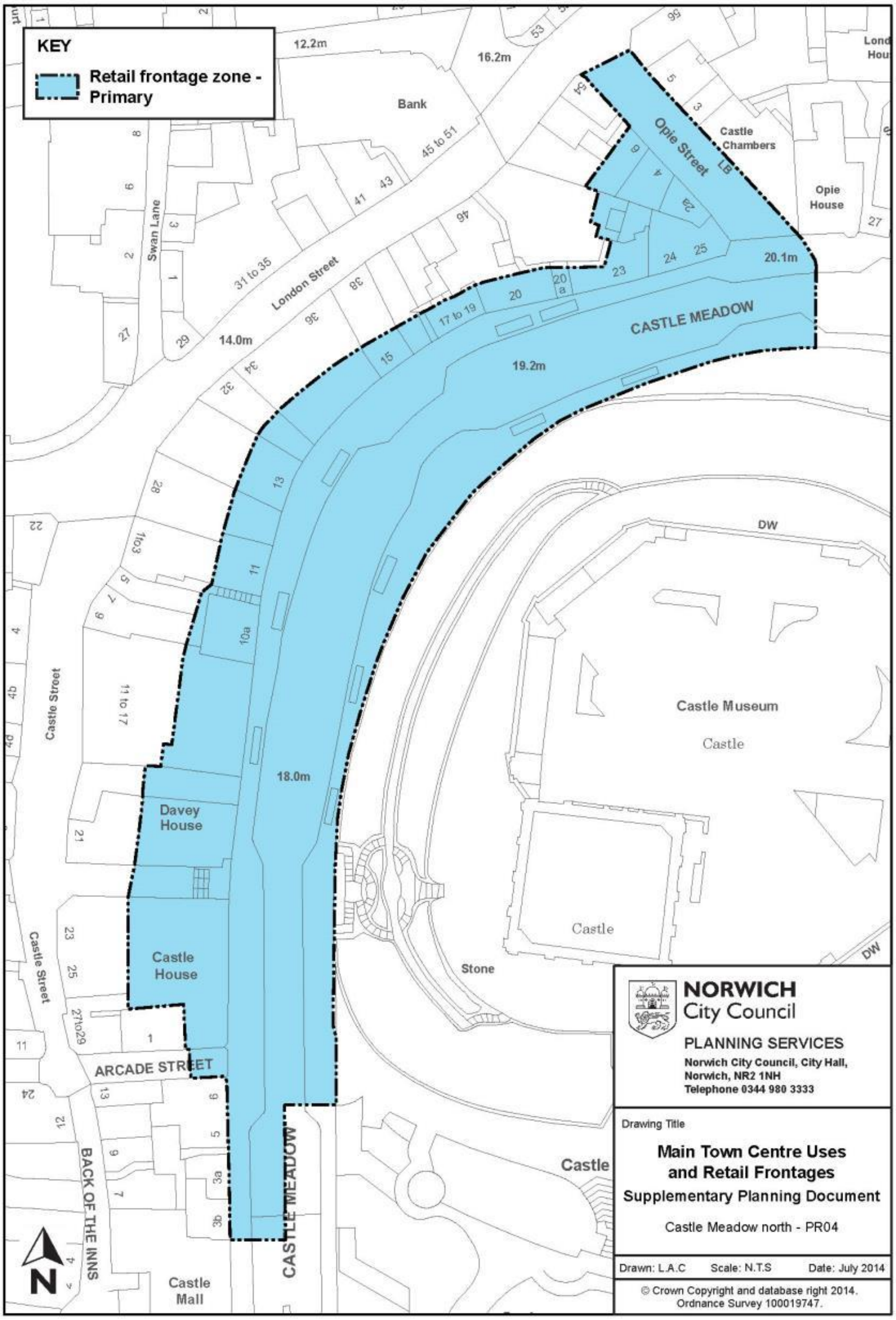
The survey of April 2014 showed the following analysis for frontages in core frontage zone PR04.

Percentage vacant units:	**20.0 percent**
Percentage vacant floorspace:	**30.0 percent**
Total length of defined retail frontage in this zone:	**0.0 metres**
Measured frontages retail/non retail split:	**Not applicable**

The zone is relatively small and vacancy rates at ground floor level relatively high, although this is skewed by the presence of some larger vacant units such as 7 Castle Meadow which has never been occupied following its refurbishment for a planned bar/restaurant use more than ten years ago. There is also a substantial amount of vacant and underused space in upper floors in larger former office premises such as Davey House, which has previously been subject to approved proposals for conversion to flats and a hotel.

In order to maintain and support the vitality, viability and character of zone **PR04**, decisions on planning applications for new development and change of use will

- Strongly support proposals for the refurbishment and enhancement of existing shop premises in Castle Meadow to improve the somewhat dated appearance of many units;
- Encourage the beneficial reuse of vacant premises at ground floor level for a broader range of main town centre uses (including temporary flexible uses) and community and educational, leisure, arts and entertainment uses. This may include cafes, restaurants, travel information centres and travel agencies which benefit from a location adjoining the Castle Meadow bus stops, and;
- Strongly support proposals for the reuse of redundant and underused upper floors, including for residential use where consistent with policies DM2, DM12 and DM13. Decisions on such proposals will also need to take account of development management policy DM19 (when the proposal involves the loss of office space) and policy DM32 (requiring new housing in the primary shopping area to be car-free).


KEY
Retail frontage zone - Primary
CASTLE MEADOW
London Street
Opie Street
Castle Street
ARCADE STREET
BACK OF THE INNS
Swan Lane
Castle Museum
Castle
Davey House
Castle House
Castle Mall
Castle Chambers
Opie House
Bank
NORWICH
City Council
PLANNING SERVICES
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Norwich, NR2 1NH
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Main Town Centre Uses
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Supplementary Planning Document
Castle Meadow north - PR04
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PR05 – Chapelfield Plain

Chapelfield Plain is an irregular, open pedestrian square situated to the north of Chapelfield and Chantry Road and forming the outdoor part of the Chapelfield shopping centre completed in 2005, the majority of which falls within separate frontage zone PC03.

This small self-contained zone accommodates a mix of shops, cafés and restaurants, reflecting its intended function as an outdoor café quarter to complement the shopping offer in the main part of Chapelfield. Currently, the smaller block on the western side of the Plain (units 408-410) is occupied by cafés and restaurants, while the larger block on the eastern side (units 401 -407) has a mix of shops and cafés. A number of separate routes link Chapelfield Plain with the main part of the primary shopping area to the north and the cultural quarter around the Forum, including an informal pedestrian route through Chantry Car Park, the attractive footpath route through St Stephens Churchyard and the alternative route around the southern edge of the churchyard leading into Malthouse Road alongside the new wing of Marks and Spencer. It is currently fully occupied with no vacancies recorded.

Policy CC29 of the Site Allocations Plan makes provision for the eventual redevelopment of the Chantry Car Park site, accepting a mix of retail, café, leisure, art and entertainment uses on ground floors and mixed uses (including retail and/or offices) on upper floors, with open space in the southern part of the site.

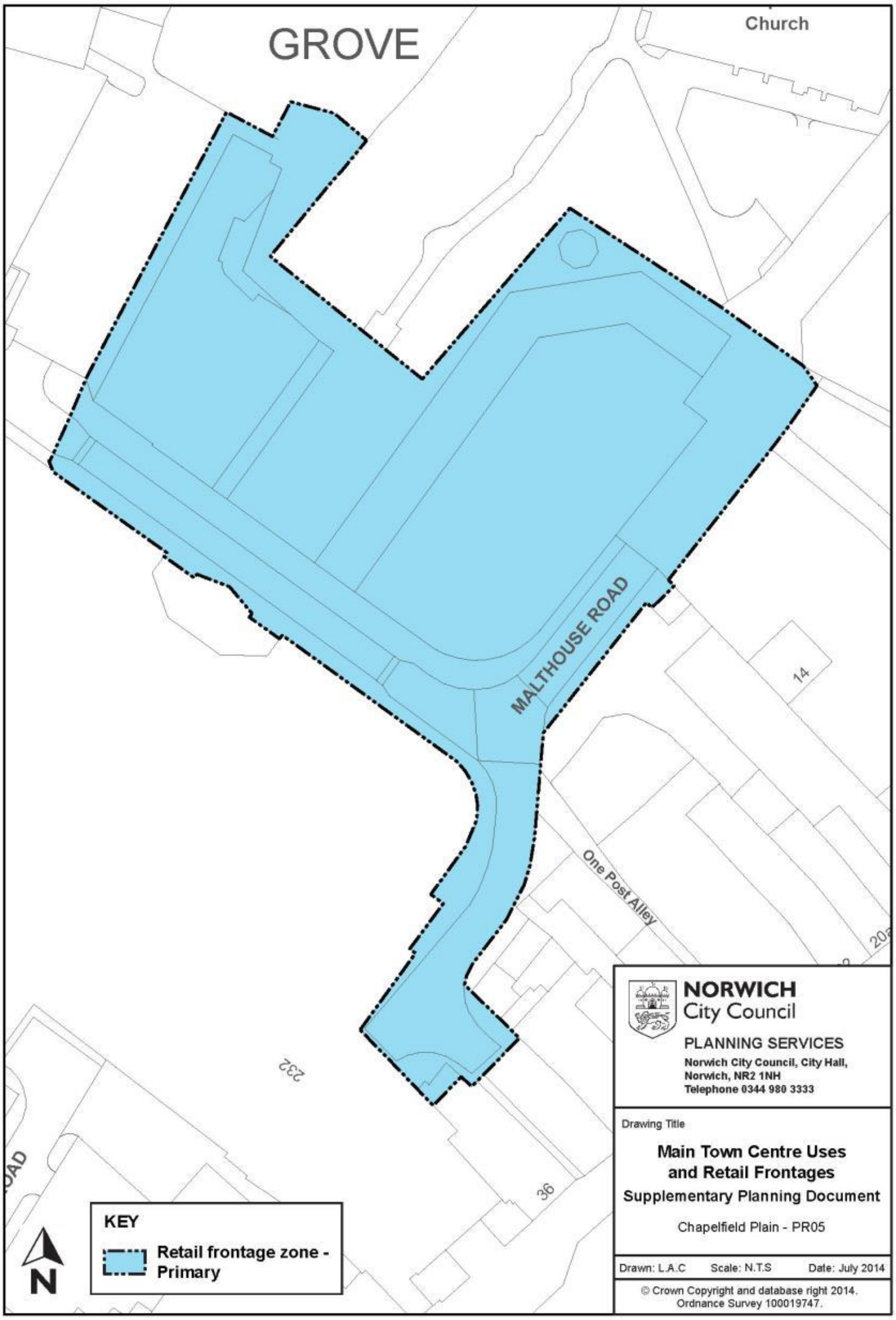
The survey of April 2014 showed the following analysis for frontages in core frontage zone PR05.

Percentage vacant units:	**0.0 percent**
Percentage vacant floorspace:	**0.0 percent**
Total length of defined retail frontage in this zone:	**0.0 metres**
Measured frontages retail/non retail split:	**Not applicable**

To encourage flexibility of uses in future the plan does not define a retail frontage for Chapelfield Plain and this SPD does not require a minimum proportion of retail use to be maintained. However, it would be beneficial to retain a proportion of shops in this area to provide an effective link between Chapelfield and the main part of the primary shopping area.

In order to maintain and support the vitality, viability and character of zone **PR05**, decisions on planning applications for new development and change of use will:

- Support a beneficial mix of retail uses and supporting services in Chapelfield Plain whilst seeking to retain the majority of shopping on its eastern side to reinforce the pedestrian route and activity links along Malthouse Road to Rampant Horse Street;
- Ensure that proposals for development on the Chantry Car Park site in accordance with site allocations plan policy CC29 are effectively integrated with existing uses Chapelfield Plain and enhance the pedestrian route through the site to the Forum;
- Support enhancements to the public realm in Chapelfield Plain which increase its attractiveness and usability for shoppers and visitors, and;
- Support proposals for temporary uses and activities within the area, in particular speciality markets and public entertainment events.


GROVE
Church
MALTHOUSE ROAD
One Post Alley
14
20a
232
36
OAD
KEY
Retail frontage zone - Primary
N
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall, Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
Chapelfield Plain - PR05
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PR06 – Timberhill/Red Lion Street

This zone is a diverse, mixed use area including the speciality retail and bar/restaurant quarter of Timberhill and Orford Hill, the east side of Red Lion Street and Orford Yard characterised by restaurants and financial service uses and the southern end of Castle Meadow which offers a range of value retailers and other supporting services. The zone lies between the core of the primary shopping area and Castle Mall, whose upper levels are reached from Timberhill via the attractive open pedestrian square of St Johns' Plain. Timberhill is an attractive historic shopping street which has benefited from sympathetic new development in recent years both in association with Castle Mall and on other sites. Large scale public realm improvements were carried out in the early 1990s, although it remained somewhat isolated from the rest of the primary area because it was effectively an "island" surrounded by main traffic routes on the city's one way system and, as a consequence, it would benefit from measures to attract more shoppers and visitors. Traffic management and bus/cycle priority measures are expected to significantly reduce traffic levels in the area in the medium term, enabling the closure of Rampant Horse Street and Westlegate to general traffic, improving connections to the rest of the primary retail area and (as part of the Westlegate House development) introducing an improved route between Westlegate, Timberhill and Castle Mall. In anticipation of these accessibility improvements the zone has been defined to extend beyond Timberhill further to the east to take in premises at the north end of Ber Street and the Woolpack Inn in Golden Ball Street.

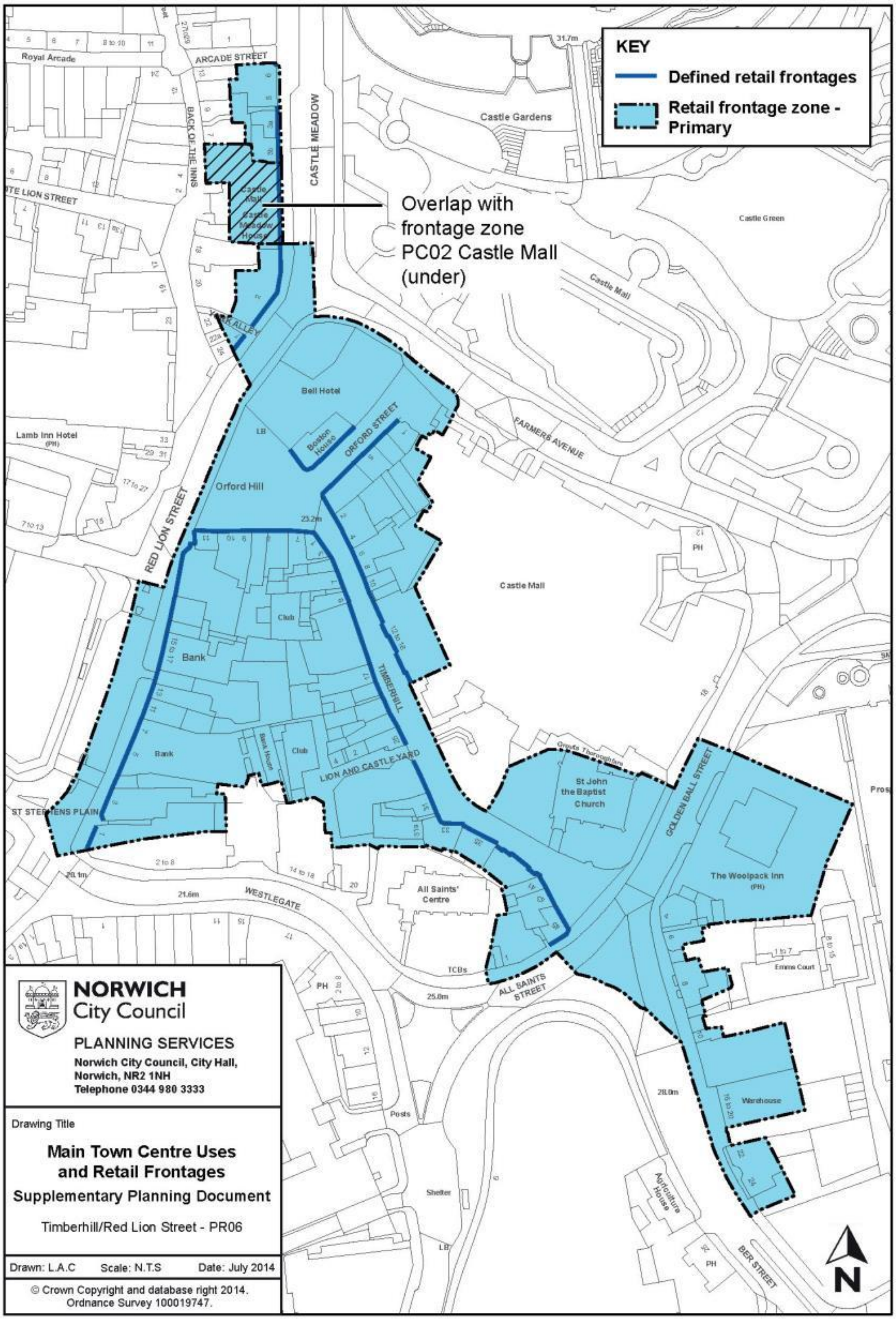
The survey of April 2014 showed the following analysis for frontages in core frontage zone PR06.

Percentage vacant units:	**5.7 percent**
Percentage vacant floorspace:	**6.3 percent**
Total length of defined retail frontage in this zone:	**~~436.0~~ 423.2 metres**
Measured frontages retail/non retail split:	**~~70.2~~ 69.3 percent A1 retail frontage** **~~29.8~~ 30.7 percent non-retail frontage**

In order to maintain and support the vitality, viability and character of zone **PR06**, decisions on planning applications for new development and change of use will

- seek to maintain an indicative minimum of **60%** of defined retail frontage in A1 retail use;
- encourage and support proposals for speciality and local independent retailing and early evening economy uses throughout the area, in particular uses which increase activity and pedestrian footfall in Timberhill;

- support the retention of diverse range of uses in Red Lion Street including extending the use of upper floors for beneficial and complementary uses (including residential use where consistent with policies DM2, DM12 and DM13), and;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres).



Note that premises at 5-6 Castle Meadow are intentionally excluded from the defined retail frontage in zone PR06 for consistency with the adopted Norwich Local Plan Policies Map, which omits this section of defined frontage due to a printing error.

Frontage Zones in the secondary areas

SR01 – The Lanes West

This area is part of the Norwich Lanes situated to the north and west of the Market Place including Guildhall Hill, Lower and Upper Goat Lane, Dove Street, St John Maddermarket, the north end of Exchange Street and the pedestrian priority section of Pottergate. This part of the Lanes area offers a mix of local independent shops and service supporting the evening economy – restaurants and bars predominating in Pottergate, Exchange Street and St Andrews Street. Previously this part of the centre has been regarded as a secondary area although this is not a reflection of its relative importance and its character is essentially similar to the streets further to the east, albeit with a higher proportion of smaller local independents and fewer larger stores.

The survey of April 2014 showed the following analysis for frontages in core frontage zone SR01.

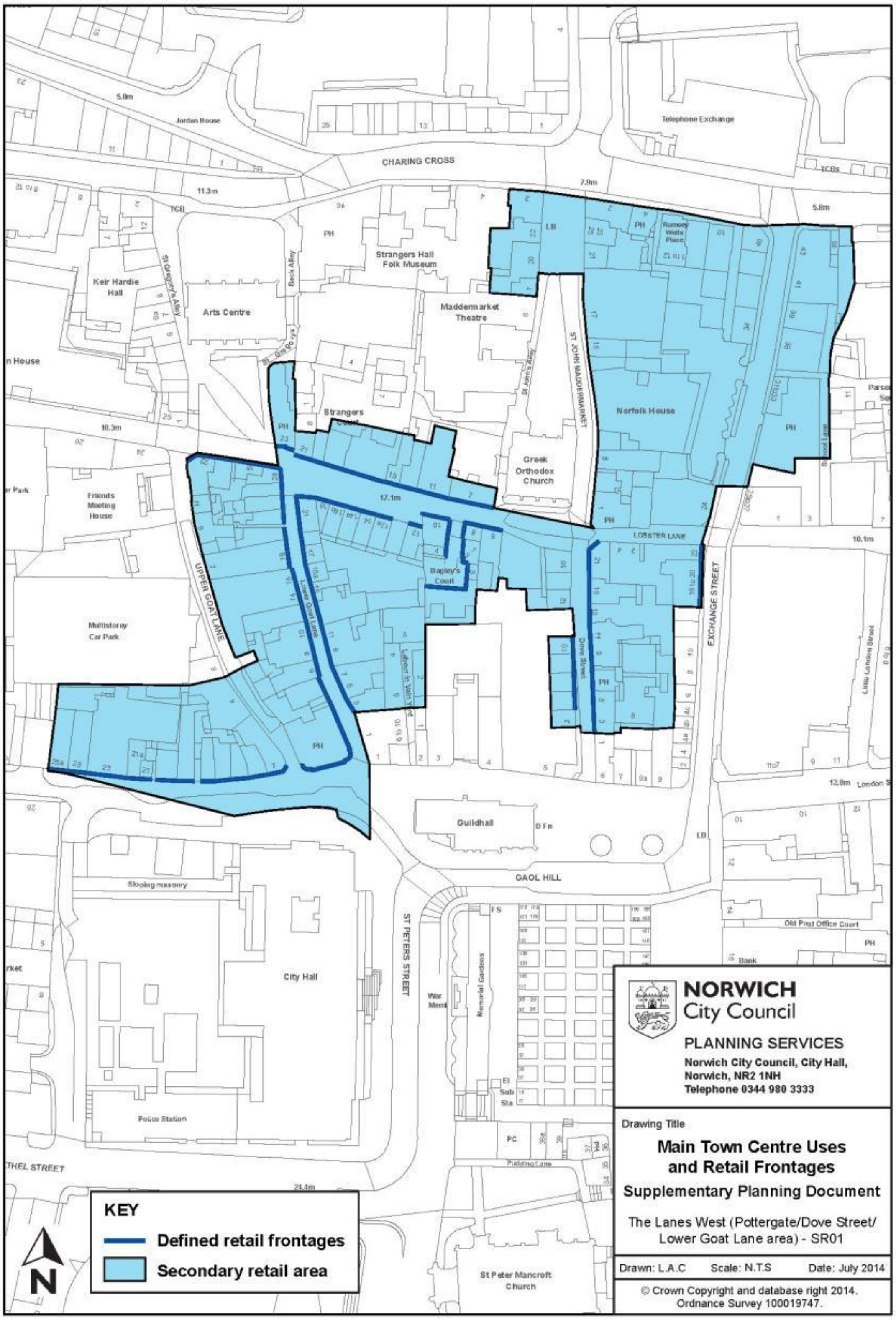
Percentage vacant units:	**3.3 percent**
Percentage vacant floorspace:	**1.2 percent**
Total length of defined retail frontage in this zone:	**367.3 metres**
Measured frontages retail/non retail split:	**81.6 percent A1 retail frontage** **18.4 percent non-retail frontage**

Shop vacancy rates in this zone are fairly low, currently, although there has been a high turnover of businesses. There are also pockets of vacancy in the streets in the northern part of the area of more mixed character where no retail frontage is defined. The focus of the area is expected to remain on speciality and independent shopping with scope for complementary uses supporting the evening economy.

In order to maintain and support the vitality, viability and shopping character of zone **SR01**, decisions on planning applications for new development and change of use will:

- Seek to maintain an indicative minimum of **70%** of defined retail frontage in A1 retail use;
- continue to support proposals for speciality and local independent retailing complementing the historic character and visitor appeal of the area;
- support the further expansion of cafes and restaurants with other main town centre uses supporting the evening economy, community uses and temporary flexible uses;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres), and;

- support complementary uses in upper floors, including residential use where consistent with policies DM2 and DM12 and DM13.


NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
The Lanes West (Pottergate/Dove Street/
Lower Goat Lane area) - SR01
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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Ordnance Survey 100019747.
KEY
Defined retail frontages
Secondary retail area
N
CHARING CROSS
EXCHANGE STREET
UPPER GOAT LANE
ST PETERS STREET
GAOL HILL
LOBSTER LANE
Guildhall
City Hall
Norfolk House
Arts Centre
Strangers Hall
Folk Museum
Maddermarket
Theatre
Greek
Orthodox
Church
Police Station
Multistorey
Car Park
St Peter Mancroft
Church

SR02 – Upper St Giles Street

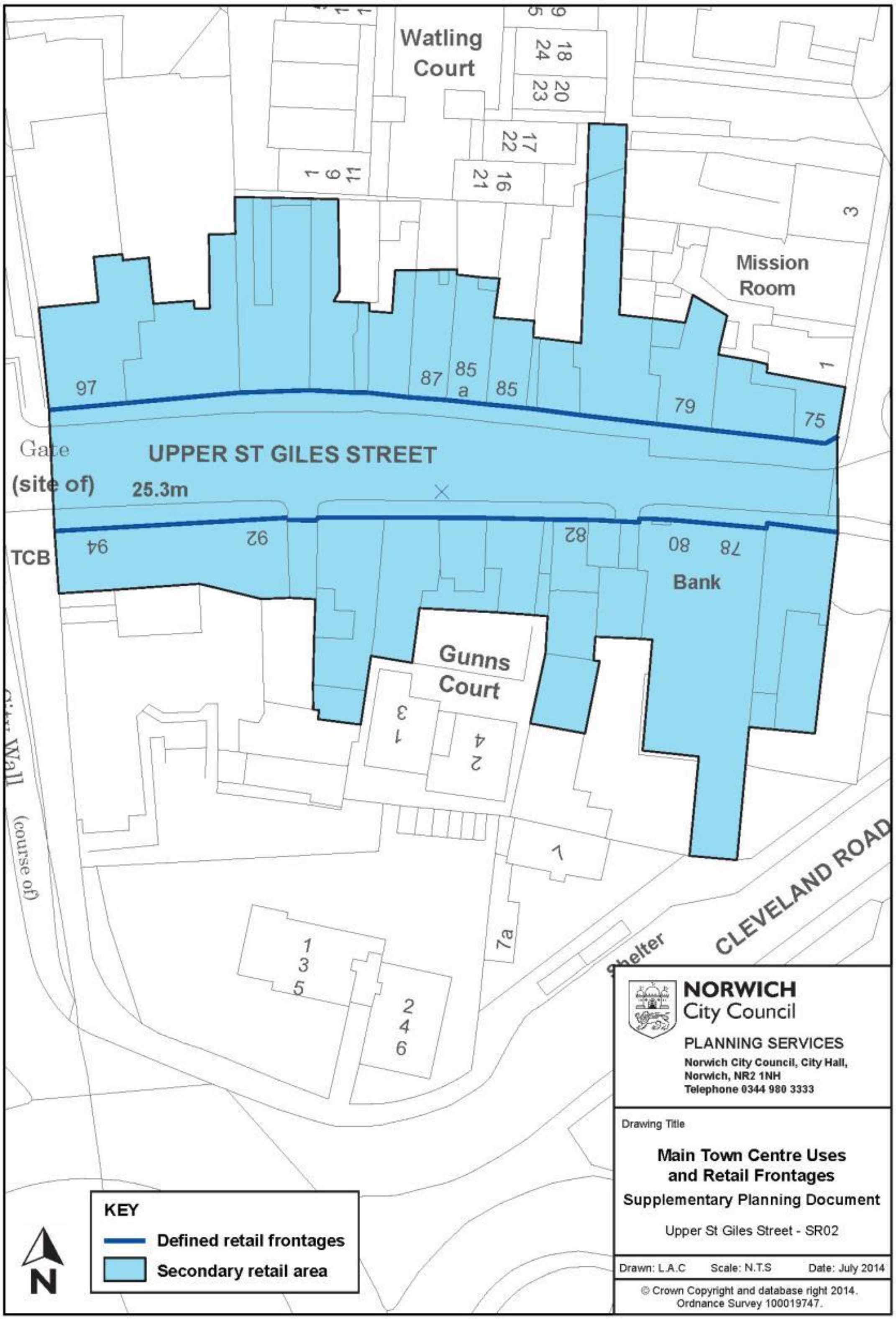
Upper St Giles Street is a small self contained specialist shopping area of great historic character at the western end of the Norwich Lanes, adjoining the 14th century St Giles' Church. Formerly a somewhat declining area it has recovered in recent years as a fashionable upmarket shopping street offering a range of specialist local independent shops, galleries cafes delicatessens and restaurants. Premises are well used with residential flats in many upper floors. A language school now occupies former office and bank buildings on the south side.

The survey of April 2014 showed the following analysis for frontages in core frontage zone SR02.

Percentage vacant units:	**0.0 percent**
Percentage vacant floorspace:	**0.0 percent**
Total length of defined retail frontage in this zone:	**134.8 metres**
Measured frontages retail/non retail split:	**65.4 percent A1 retail frontage** **34.6 percent non-retail frontage**

In order to maintain and support the vitality, viability and shopping character of zone **SR02**, decisions on planning applications for new development and change of use will:

- Seek to maintain an indicative minimum of **60%** of defined retail frontage in A1 retail use;
- continue to support proposals for speciality and local independent retailing complementing the historic character and visitor appeal of the area;
- support the further expansion of hospitality uses supporting the evening economy, complementary main town centre uses, community uses and temporary flexible uses;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres), and;
- support complementary uses in upper floors, including residential use where consistent with policies DM2 and DM12 and DM13.


Watling Court
Mission Room
UPPER ST GILES STREET
Gate (site of)
25.3m
TCB
97
87
85 a
85
79
75
94
92
82
80
78
Bank
Gunns Court
CLEVELAND ROAD
Shelter
City Wall (course of)
KEY
Defined retail frontages
Secondary retail area
N
NORWICH City Council
PLANNING SERVICES
Norwich City Council, City Hall, Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
Upper St Giles Street - SR02
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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SR03 – St Benedicts Street area

This zone is a westward continuation of zone SR01 and the majority of the area falls within the Norwich Lanes. It comprises St Benedicts Street, the retail frontage to St Gregory's Alley and the Cathedral Retail Park, which adjoins St Benedict's Street at its western end (no frontage is defined for the retail park). St. Benedict's is a long established historic secondary shopping area which offers a diverse range of speciality shops, cafes and community uses, also including four of the city's 32 medieval churches, now used variously as cultural and exhibition centres and music and arts venues. St. Benedict's has benefited from long term regeneration initiatives and more recent redevelopment for housing. It has developed a strong focus on music, alternative culture and the evening economy with cafes and restaurants predominant toward its eastern end. The Cathedral Retail Park dates from the 1980s and accommodates a number of bulky goods retailers. Despite being planned as complementary to the more traditional shopping offer in St Benedicts at the time, its integration with St Benedicts itself is poor. The adjoining Barn Road Car Park site is allocated in the Site Allocations Plan (site specific policy CC24) for mixed retail, housing and office development with public car parking reprovided on site.

The survey of April 2014 showed the following analysis for frontages in core frontage zone SR03.

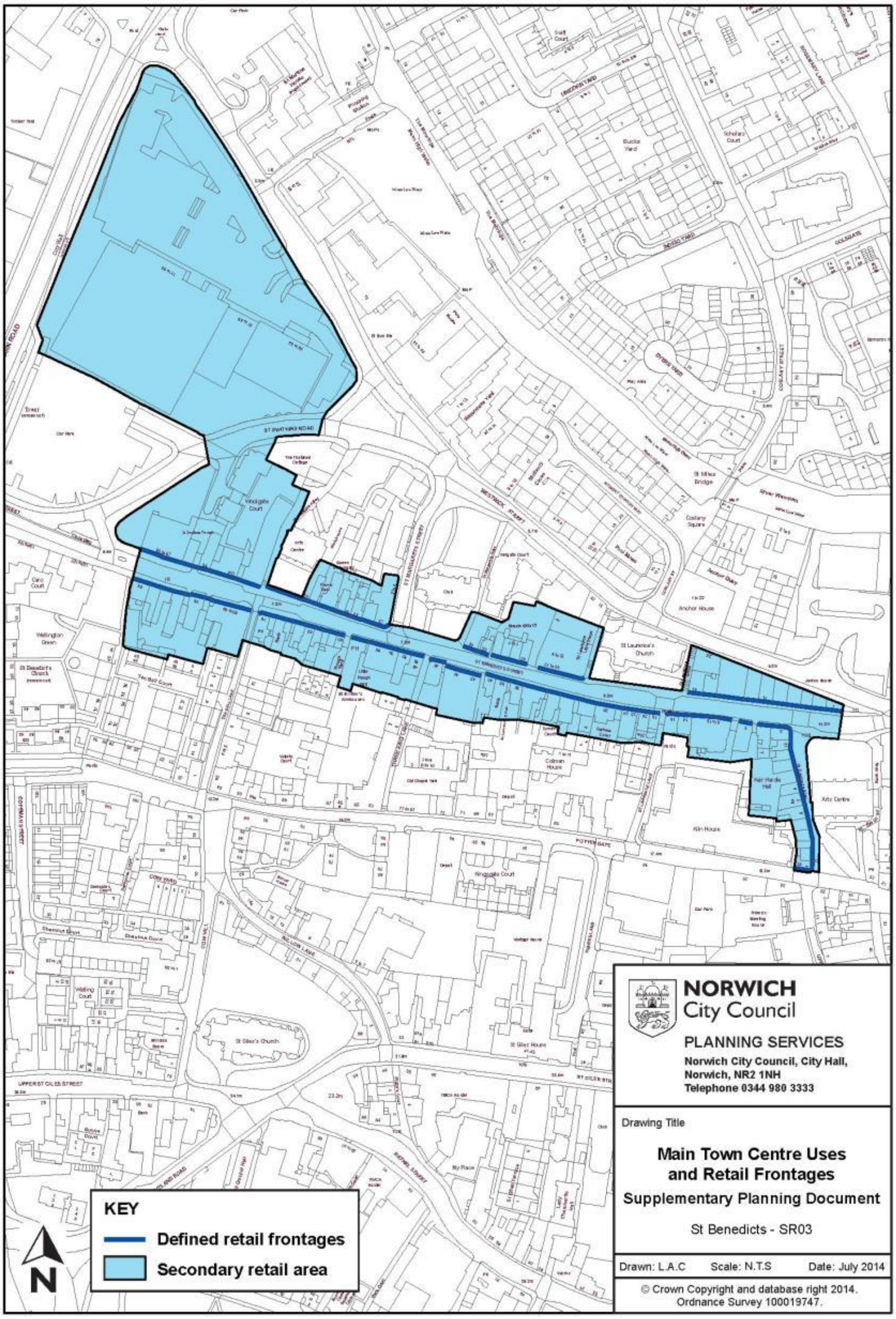
Percentage vacant units:	**5.5 percent**
Percentage vacant floorspace:	**4.8 percent**
Total length of defined retail frontage in this zone:	**644.1 metres**
Measured frontages retail/non retail split:	**65.4 percent A1 retail frontage** **36.1 percent non-retail frontage**

In order to maintain and support the vitality, viability and shopping character of zone **SR03**, decisions on planning applications for new development and change of use will:

- Seek to maintain an indicative minimum of **60%** of defined retail frontage in A1 retail use;
- continue to support proposals for speciality and local independent retailing complementing the historic character and retail function of the area;
- support the further expansion of hospitality uses supporting the evening economy complementary main town centre uses, community uses and temporary flexible uses;
- Discourage concentrations of non-retail uses at ground floor level which would result in continuous runs of inactive frontage ~~(including residential use)~~;
- support complementary uses in upper floors, including residential use where consistent with policies DM2 and DM12 and DM13;

- Consider proposals for new development and change of use in the Cathedral Retail Park in accordance with policy DM18 of the DM Policies Plan.

The Site Allocations Plan proposes redevelopment of the adjoining Barn Road Car Park site in accordance with Site Allocations Plan policy CC24, with preference being given to new uses at ground floor level which will complement and reinforce the vitality, viability and retail function of the St Benedicts Area frontage zone and the Lanes area as a whole.


NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
St Benedicts - SR03
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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Ordnance Survey 100019747.
KEY
Defined retail frontages
Secondary retail area
N

SR04 – Elm Hill/Wensum Street

Elm Hill is one of the most important tourist/visitor attractions in Norwich but is separated from the majority of the central retail area. The attractive medieval cobbled street has great historic character and considerable visitor appeal, with a mix of private houses, shops and cafes in listed and other historic premises lining it on both sides. A series of historic courts and alleys connect the street with the Riverside Walk and Elm Hill gardens behind. The neighbouring Wensum Street, running from Tombland adjoining the cathedral to Fye Bridge, is on the main bus route into the city centre from the north. It is a more obviously commercial area with a mix of bars, restaurants, speciality and value retailers. This area of the city centre has benefited from an increase in residential population through major new housing development in recent years particularly in and around Quayside immediately to the east. Other major attractions such as the Cathedral, St Andrews and Blackfriars Halls and a tourist riverbus service running from Elm Hill Quay are in easy reach.

Historically Elm Hill (and to a lesser extent, Wensum Street and Tombland) has been a traditional centre for antique and craft shops and galleries, but in recent years the focus of speciality retailing has shifted more obviously to the Norwich Lanes. Some former shop premises in Elm Hill have been converted to living accommodation and greater diversity of supporting services has been introduced, particularly pubs, bars, cafe bars and restaurants in and around Wensum Street and beyond. The Norwich University of the Arts is based nearby, and its continuing expansion will attract more activity into the area and present opportunities for additional facilities and services appealing to NUA students.

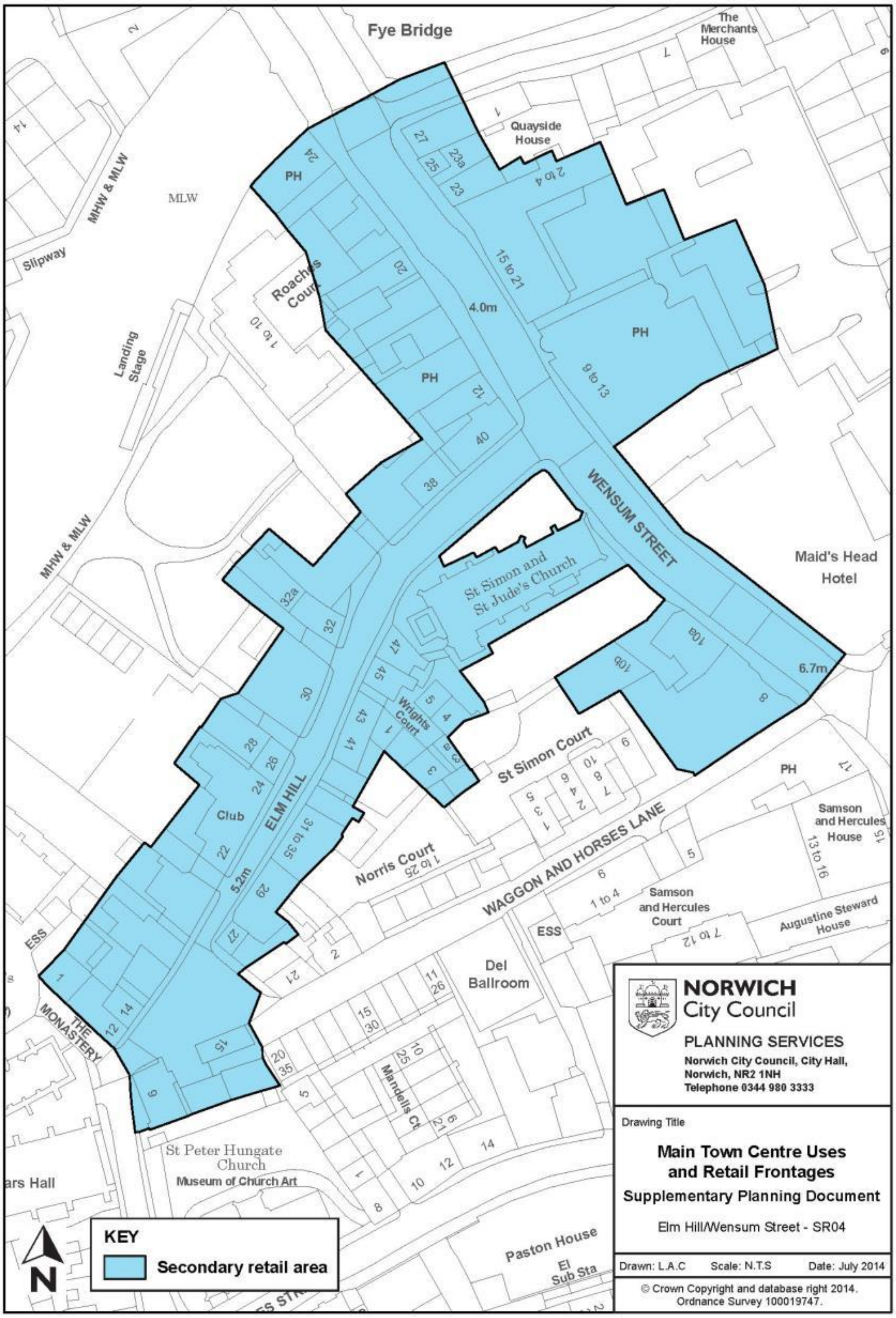
The survey of April 2014 showed the following analysis for frontages in core frontage zone SR04.

Percentage vacant units:	**4.2 percent**
Percentage vacant floorspace:	**2.6 percent**
Total length of defined retail frontage in this zone:	**0.0 metres**
Measured frontages retail/non retail split:	**Not applicable**

The character and historic built form of Elm Hill means that shops and commercial premises are interspersed with private houses, resulting in a discontinuous and fragmented frontage at ground floor level. For this reason policy DM20 does not define a specific retail frontage in this area. To deliver maximum benefits for the area it would be beneficial to support the management of uses in the zone through this SPD with specific investment to help raise the profile of the area, for example more effective signage and visitor publicity, public realm improvements and other measures to attract and retain shoppers and visitors.

In order to maintain and support the vitality, viability and shopping character of zone **SR04**, decisions on planning applications for new development and change of use will:

- Aim to maintain the focus of Elm Hill on speciality retailing appealing to tourists and visitors, seeking to retain non-residential uses and supporting services at ground floor level to ensure its continued vitality and viability as a visitor destination;
- Where consistent with other local plan policies, support the introduction of further early evening economy uses and hospitality uses in Wensum Street and Tombland (however it should be noted that late night uses will not be permitted in this area);
- Determine proposals for hospitality and early evening economy uses in accordance with policy DM23, giving particular attention to the need to protect residential amenity and avoid localised increases in noise and disturbance;
- Avoid concentrations of non-retail uses at ground floor level which would result in continuous runs of inactive frontage ~~(including residential use)~~, and in particular;
- Resist the loss of shops and other commercial uses on street frontages to provide visual continuity and contribute to the overall attractiveness and vitality of the area.



Fye Bridge
The Merchants House
Quayside House
Roaches Court
Landing Stage
Slipway
MHW & MLW
MLW
ELM HILL
WENSUM STREET
St Simon and St Jude's Church
Wrights Court
St Simon Court
Norris Court
WAGGON AND HORSES LANE
Maid's Head Hotel
Samson and Hercules House
Samson and Hercules Court
Augustine Steward House
Del Ballroom
Mandells Ct
St Peter Hungate Church
Museum of Church Art
Paston House
THE MONASTERY
KEY
Secondary retail area
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall, Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
Elm Hill/Wensum Street - SR04
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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SR05 – London Street East

This secondary retail area comprises the pedestrianised section of London Street east of Bedford Street and takes in the north side of Opie Street and 27 Castle Meadow (the Open Studio). London Street is the main pedestrian route from the primary shopping area to the Cathedral. Although technically part of the speciality and local independent shopping area of the Norwich Lanes this part of London Street is slightly remoter from the main shopping areas and has for many years been a more diverse area. Banks, building societies and financial services uses, as well as some cafes and restaurants, complement its retail offer. The proportion of shops to other main town centre uses at ground floor level is approximately half and half: consequently no retail frontage is defined in this zone.

This end of London Street functions as a transitional area between the primary shopping area, the commercial office quarter around the Cathedral and the expanding evening economy area of bars, clubs and pubs around Queen Street and Upper King Street leading into the Late Night Activity Zone centred on Prince of Wales Road. As such, it would be possible for the street to evolve in a number of directions – either to reinstate its traditional role as a stylish shopping street, to become mainly a cafe quarter or to become an extension of the financial services area around Bank Plain. As noted in the commentary to area PR02 (The Lanes East) above, Norwich BID is seeking to improve and enhance the retail offer in London Street by positioning it as a high quality prestige retailing area.

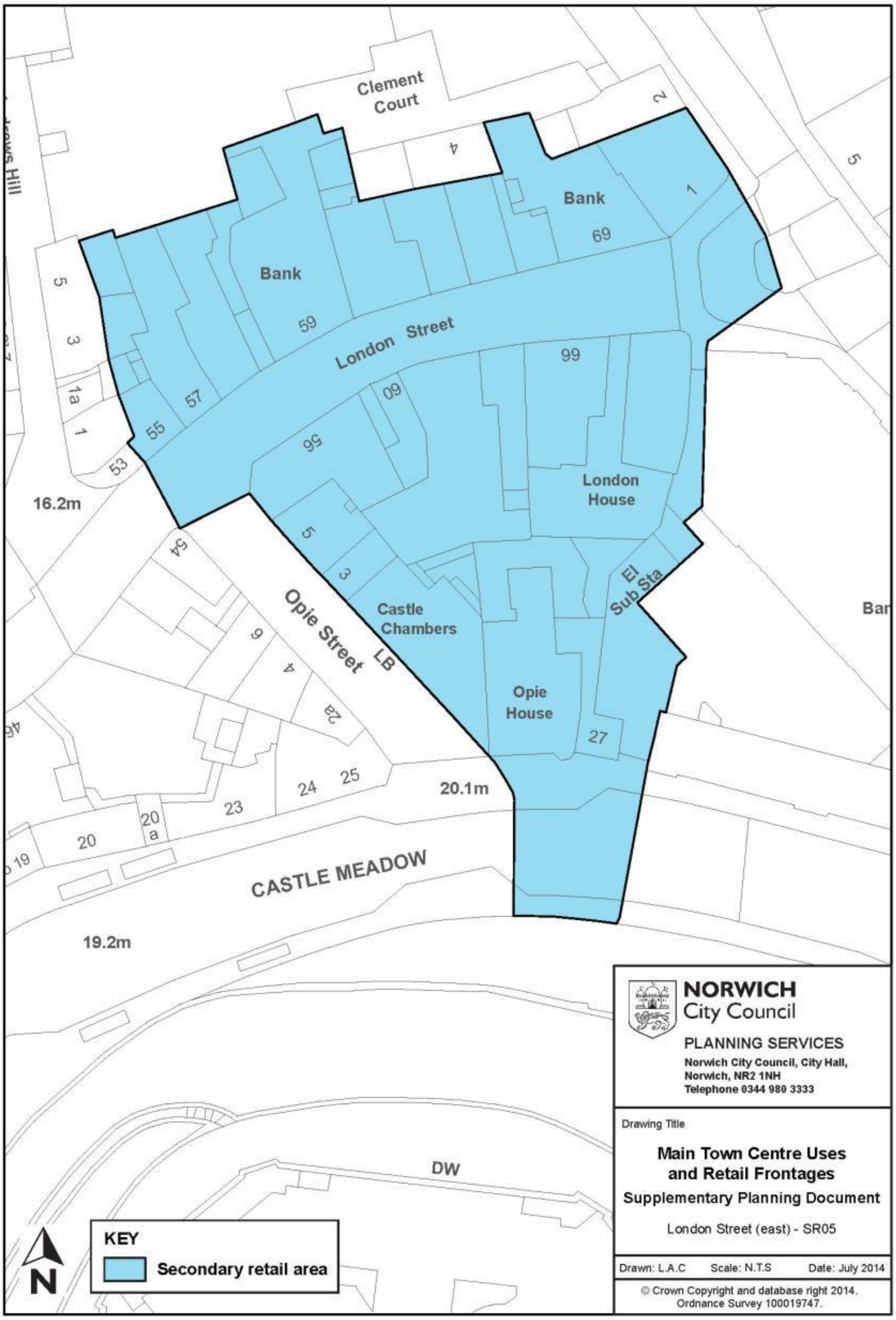
The proximity of the Open music, art and entertainment venue at Bank Plain (and its associated studio) means that there is a growing emphasis on late night entertainment in the area which has led to some late night clubs and bars in upper floors in London Street – however, current planning policy seeks to contain such uses within the Late Night Activity Zone further to the east and a significant increase of such uses in this area could be problematic, eroding the retail function of the street and reducing activity and vitality during the day.

The survey of April 2014 showed the following analysis for frontages in core frontage zone SR04.

Percentage vacant units:	**4.2 percent**
Percentage vacant floorspace:	**2.6 percent**
Total length of defined retail frontage in this zone:	**0.0 metres**
Measured frontages retail/non retail split:	**Not applicable**

In order to maintain and support the vitality, viability and shopping character of zone **SR05**, decisions on planning applications for new development and change of use will:

- continue to support proposals for speciality and local independent retailing complementing the historic character of the area;
- support the further expansion of hospitality uses supporting the early evening economy, complementary main town centre uses, financial services uses, community uses and temporary flexible uses;
- Discourage concentrations of non-retail uses which would result in continuous runs of inactive ground floor frontage (for example betting shops and amusement centres), and;
- support complementary uses in upper floors, including residential use <u>and visitor accommodation</u> where consistent with policies DM2 and DM12 and DM13, whilst generally resisting late night bar and club uses, which <u>(</u>in accordance with policy DM23<u>)</u> will not generally be permitted in this area.


Clement Court
Bank
Bank
1
2
4
5
69
59
London Street
99
60
57
55
56
53
5
3
1a
1
16.2m
London House
54
Opie Street
6
4
2a
LB
5
3
Castle Chambers
El Sub Sta
Opie House
27
25
24
23
20 a
20
19
20.1m
CASTLE MEADOW
19.2m
DW
KEY
Secondary retail area
N
NORWICH City Council
PLANNING SERVICES
Norwich City Council, City Hall, Norwich, NR2 1NH
Telephone 0344 980 3333
Drawing Title
Main Town Centre Uses and Retail Frontages
Supplementary Planning Document
London Street (east) - SR05
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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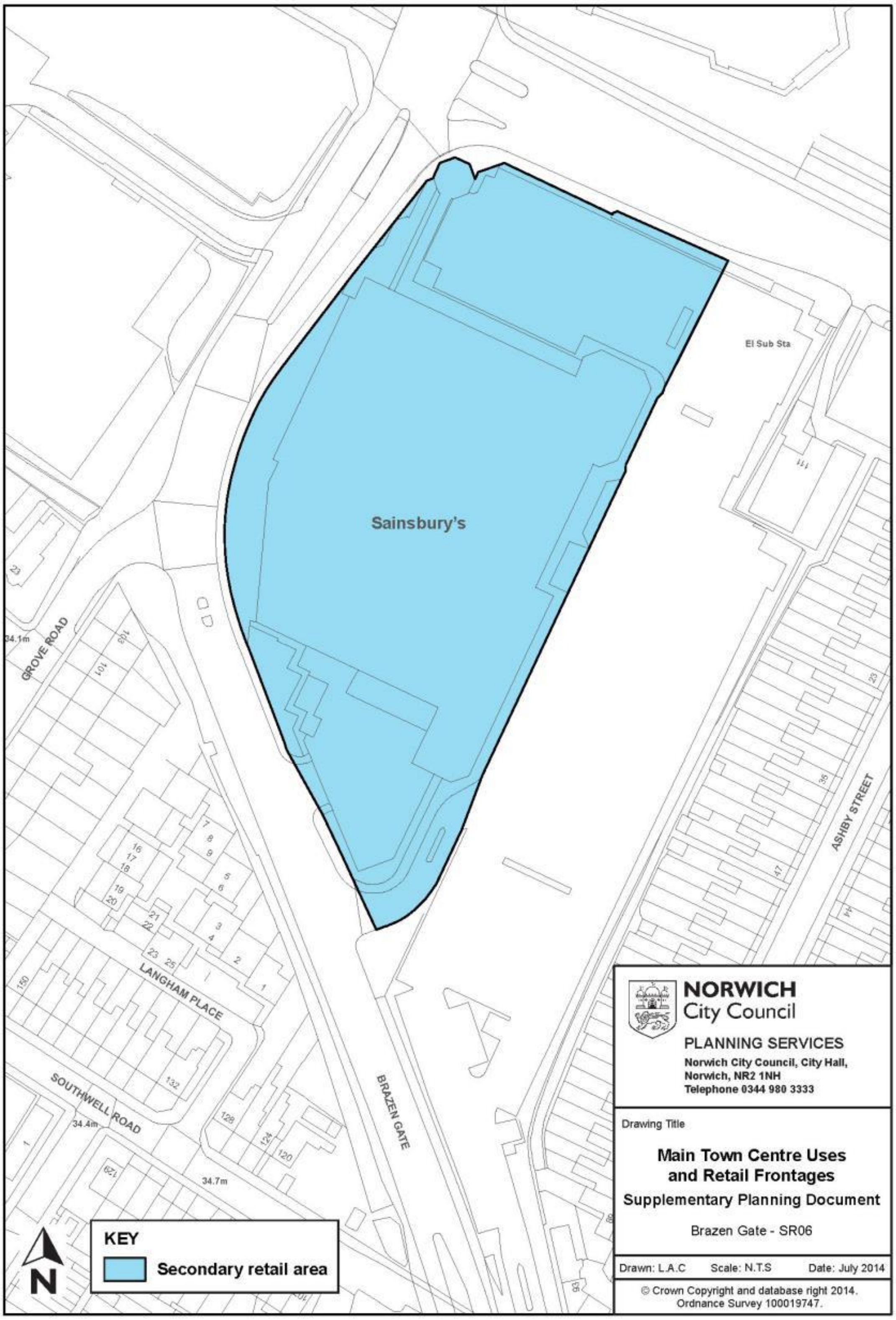
SR06 – Brazen Gate

Brazen Gate, to the south of the inner ring road on the southern fringe of the city centre, is defined in the Greater Norwich Joint Core Strategy and the development management policies plan as a secondary shopping area in its own right. It currently accommodates a large Sainsburys food store and no other shop units.

No retail frontages are defined in this zone.

In order to maintain and support the vitality, viability and retail function of zone **SR06**:

- planning applications for new development, change of use and variation of conditions on the existing Sainsbury store will be assessed and determined in accordance with policy DM18 of the plan and the hierarchy of centres as set out in policy 19 of the JCS.


Sainsbury's
El Sub Sta
GROVE ROAD
LANGHAM PLACE
SOUTHWELL ROAD
BRAZEN GATE
ASHBY STREET
34.1m
34.4m
34.7m
KEY
Secondary retail area
N
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
Norwich, NR2 1NH
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Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Brazen Gate - SR06
Drawn: L.A.C
Scale: N.T.S
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Large district centres

LD01 – Magdalen Street/Anglia Square

The Magdalen Street/Anglia Square Large District Centre is situated in the northern part of the city centre north and south of the Inner Ring Road, comprising the historic areas of Magdalen Street and St Augustine's Street and the 1970s built neighbourhood shopping centre of Anglia Square. It is an extensive area of varied character and functions both as a district shopping centre meeting day to day shopping needs and a specialist area with a particular focus on specialist ethnic and value retailers, restaurants and the evening economy. Having been in long term decline there has been a recent recovery in activity although pockets of vacancy remain in the northern end of Magdalen Street and in parts of St Augustine's Street, where some ground floor shops have been converted to residential use. The introduction of traffic management measures and a one way gyratory system has significantly enhanced the environment of St Augustine's Street and improved conditions for pedestrians and shoppers.

Anglia Square is allocated in the adopted Northern City Centre Area Action Plan (NCCAAP) (policy AS1) for major retail and mixed use regeneration. Planning permission was granted in March 2013 for a two-phase regeneration scheme comprising a foodstore and new retail units, flats, food and drink uses, leisure uses, refurbished office space and parking. Following the sale of the site to Threadneedle Investments in 2014, this scheme is unlikely to proceed in its approved form although the new owners are committed to a beneficial regeneration of Anglia Square and new proposals are expected to be brought forward in the near future.

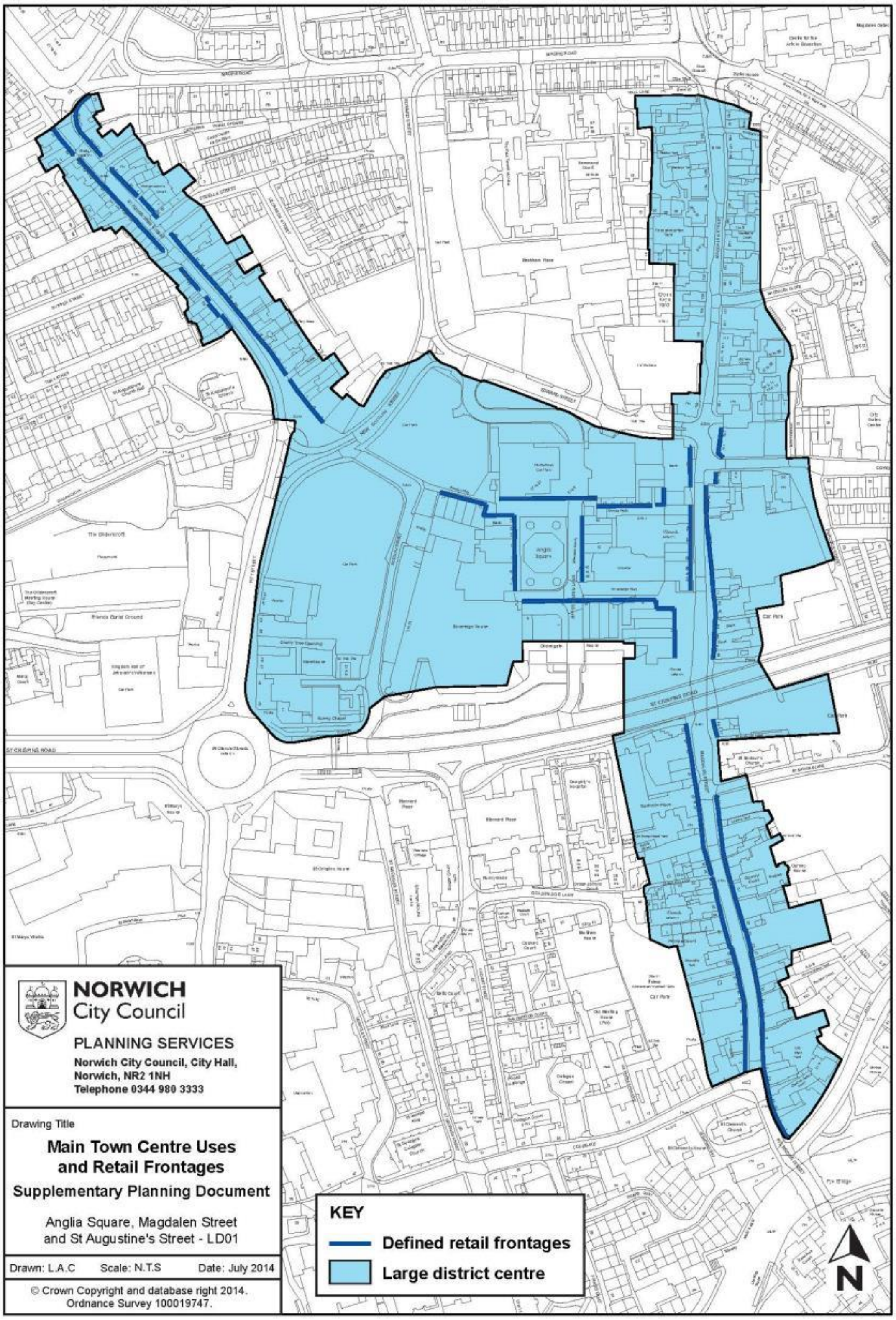
Changes of use within the Large District Centre are currently assessed and determined under policy LU2 of the adopted NCCAAP. It requires that the proportion of A1 retail uses at ground floor level should not fall below 70% (this threshold has already been breached), prohibits the change of use of ground floor shop units to residential use during the period of construction of Anglia Square and requires developers to justify such proposals thereafter. For the avoidance of doubt, Policy DM20 of the Development Management Policies Plan supported by this SPD will **supersede** policy LU2 when both documents are adopted.

The survey of April 2014 showed the following analysis for frontages in core frontage zone LD01.

Percentage vacant units:	**10.8 percent**
Percentage vacant floorspace:	**8.9 percent**
Total length of defined retail frontage in this zone:	**1167.3 metres**
Measured frontages retail/non retail split:	**67.1 percent A1 retail frontage** **32.9 percent non-retail frontage**

In order to maintain and support the vitality, viability and shopping character of zone **LD01**, decisions on planning applications for new development and change of use will:

- Seek to maintain an indicative minimum of **60%** of defined retail frontage in A1 retail use;
- continue to support proposals for speciality and local independent retailing complementing the historic character and retail function of the area;
- support the further expansion of hospitality uses supporting the evening economy complementary main town centre uses, community uses and temporary flexible uses;
- Discourage concentrations of non-retail uses at ground floor level which would result in continuous runs of inactive frontage ~~(including residential use)~~;
- support complementary uses in upper floors, including residential use where consistent with policies DM2 and DM12 and DM13;
- Consider proposals for change of use of ground floor premises to residential use on a case by case basis and accept them where consistent with policies DM2, DM12 and DM13 and other relevant local plan policies. In assessing such proposals, account will be taken of the impact of individual changes on the vitality, viability and diversity of the street and the large district centre as a whole. Preference will be given to proposals which would result in a designated or locally identified heritage asset or other long-term vacant building being brought back into beneficial use where it is demonstrated that those benefits could not be delivered by retaining a retail use, and;
- During the period of construction of the Anglia Square development the council will seek to resist the loss of ground floor retail and commercial premises to residential use to protect the vitality, viability and retail function of the area.


NORWICH
City Council
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Norwich City Council, City Hall,
Norwich, NR2 1NH
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Drawing Title
Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Anglia Square, Magdalen Street
and St Augustine's Street - LD01
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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Ordnance Survey 100019747.
KEY
Defined retail frontages
Large district centre
N

LD02 – Riverside

Riverside, to the east of the city centre, is defined in the Greater Norwich Joint Core Strategy and the development management policies plan as a freestanding large district centre. It currently accommodates a retail warehouse park of around 17,000 sq.m net and a small number of ground floor commercial units fronting Broadland Court.

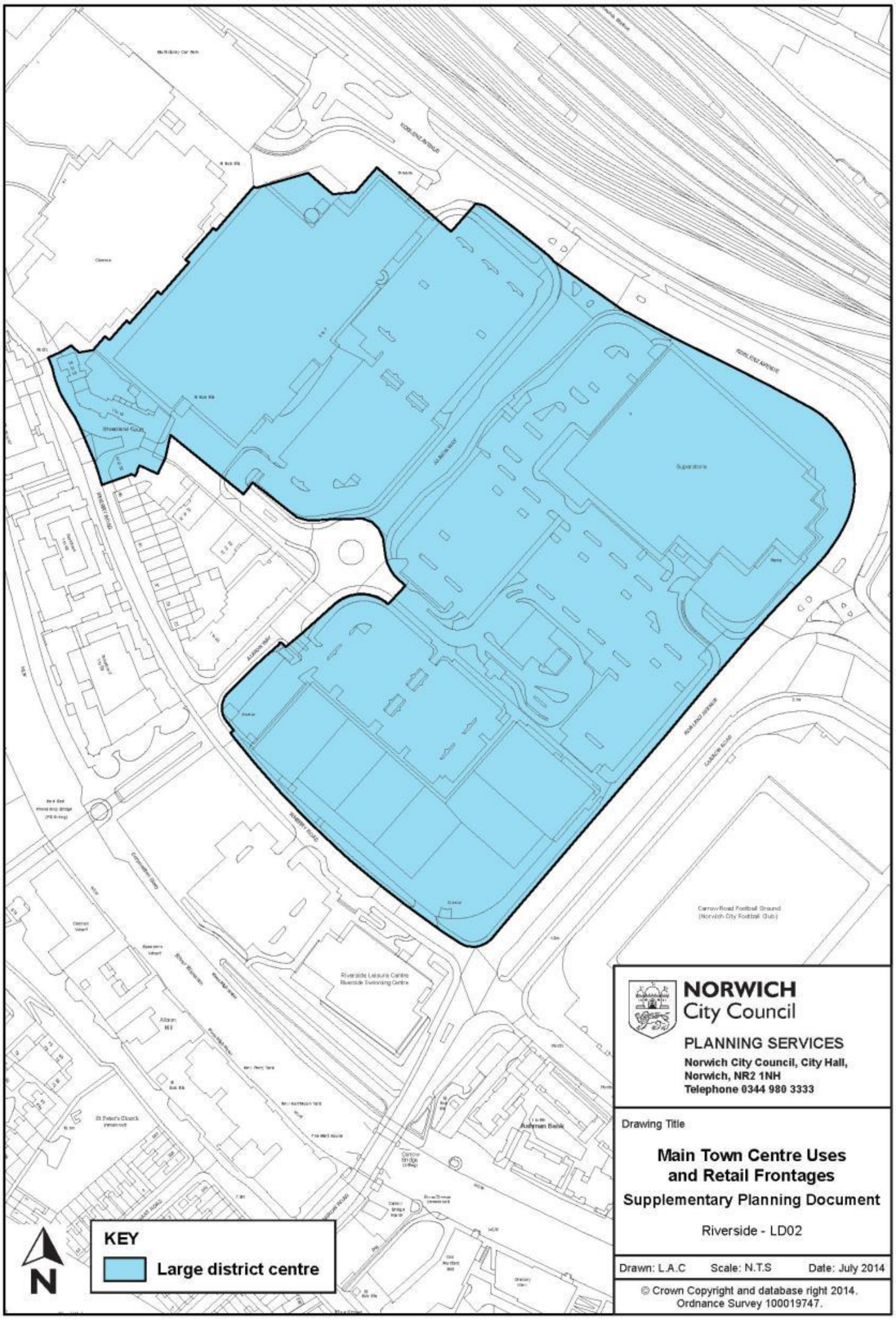
No retail frontages are defined in this zone.

In order to maintain and support the vitality, viability and retail function of zone **LD02**:

- planning applications for new development, change of use and variation of conditions on the existing retail warehouses within the retail park will be assessed and determined in accordance with policy DM18 of the plan and the hierarchy of centres as set out in policy 19 of the JCS.

Policy DM18 requires that there will be no further retail development at the Riverside Large District Centre unless it provides sustainable transport improvements to significantly enhance accessibility by public transport and pedestrian and cycle linkages from the retail park to the primary and secondary retail areas, sufficient to offset any potentially harmful impacts on traffic congestion and highway safety arising from additional trip generation associated with the new development.

In practical terms, proposals for minor development which would have no implications for traffic generation would not be subject to the policy.



Superstore
Carrow Road Football Ground
(Norwich City Football Club)
Riverside Leisure Centre
Riverside Swimming Centre
NORWICH
City Council
PLANNING SERVICES
Norwich City Council, City Hall,
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Main Town Centre Uses
and Retail Frontages
Supplementary Planning Document
Riverside - LD02
Drawn: L.A.C
Scale: N.T.S
Date: July 2014
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Ordnance Survey 100019747.
KEY
Large district centre
N

5. Conclusions and next steps

5.1 Norwich City Council's integrated, proactive approach to planning for shopping has been crucial in delivering the range and quality of shopping experience which exists in Norwich today, and has secured its continuing vitality and viability as a thriving retail and visitor destination for the region in the face of many complex development pressures. Careful and responsible management of change in defined shopping areas through the planning process has been and should continue to be fundamental to this strategy.

5.2 The council is confident that policy DM20 of the Development Management Policies Plan, supported by this SPD, will provide a sound basis for the future management of change in defined shopping frontages and other areas of the centre to maintain their vitality, viability and diversity in the long term.

5.3 Following consultation on this draft version of the SPD, comments and suggestions for change will be assessed and incorporated, as appropriate into the final version of the document. It will then be adopted alongside the development management policies plan during the autumn.

APPENDIX 1

Development Management Policy DM20

Policy DM20

Managing change in the primary and secondary retail areas and Large District Centres

Defined retail frontages

Within the defined primary and secondary retail areas and Large District centres, permanent changes of use to classes A2, A3, A4, A5, and other main town centre uses, will be permitted where:

a) they would not have a harmful impact on the vitality and viability of the area and on the individual street; and

b) within retail frontages defined on the Policies Map, where they would not result in the proportion of A1 retail uses at ground floor level falling below an indicative minimum proportion which is justified as necessary to support the continued retail function of that frontage zone.

The indicative minimum thresholds used in support of this policy will be set out in the Main Town Centre Uses and Retail Frontages supplementary planning document. The supplementary planning document will be prepared in accordance with the timescales set out in the Local Development Scheme 2014, adopted alongside this plan and reviewed flexibly as necessary in response to objective evidence of retail market trends and changes in the character and function of the central shopping area over the plan period.

In assessing proposals for change of use within defined retail frontage zones, the proportion of A1 retail use in that frontage will be calculated taking account of any other proposals in the same zone permitted but not implemented.

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Mr B C	General	It appears that the proposed threshold for non retail uses is lower in nearly all zones than currently. Norwich already has sufficient banks, building societies and catering establishments – to provide for an increase would not attract or retain sufficient shopping visitors from around the region. Also queries the council's reasoning for approving ASDA at Hall Road if the city centre is perceived to be under threat.	**Not accepted**: It is apparent from market signals and objective evidence of retail trends nationally that high street shopping as an activity and the amount of floorspace in retail use will continue to contract at the expense of other uses and supporting services. The key to successful city centres lies in anticipating and planning for this transition, promoting them as "destinations" with attractive environments offering opportunities for a range of activities and services for the visitor. There will also be an increased role for housing as city centres continue to evolve as places to live. Local planning policy for Norwich must acknowledge this shift in emphasis as well as ensuring that the rapidly changing needs of businesses and other city centre stakeholders are met. To maintain an unrealistically high benchmark for the level of shopping desirable in the various frontage zones would merely result in more refusals of planning permission and more vacant premises unable to attract retail tenants. With reference to the grant of planning permission for Hall Road District Centre focused on a new ASDA, the retail impact assessment submitted in support of that scheme showed that its effect on the city centre would not be critical, and the level of comparison retail floorspace has been limited by condition to ensure that this remains the case. This is not an issue for this SPD. *No change.*
Mr D K	Page 34 (PR04 Castle Meadow North) and general comments	The long-term decline of Castle Meadow as a shopping area must be attributed to past council policy decisions (allegedly complicit with	**Not accepted:** Retaining Castle Meadow North as part of the primary retail area in the local plan acknowledges its continuing importance and the presence of major retailers such as Waterstones and Boots with frontages to and linkages with the

Respondent	Page/Para	Comment	Council response
		“the bus business”) to centralise retailing and reposition the street as a bus station, to the detriment of independent retailers in the area. The breakdown of retail and non retail uses for this zone in the SPD does not show any retail activity at all, demonstrating that Castle Meadow has been effectively forgotten in the document. The proposals simply recommend more restaurants and cafés which shows a lack of vision.	important pedestrian shopping areas of Castle Street and London Street. National research has shown that shopping areas are most successful where shoppers have easy and direct access to public transport, so we cannot support the argument that shops are failing *because* of the presence of nearby bus stops. The council accepts that Castle Meadow is less important as a shopping street than it once was, but in our view this is as much to do with changing retail trends nationally as with any past policy decisions of the city council. The council has an obligation to respond and adapt to a rapidly changing retail environment through its planning policies, seeking to encourage new investment and manage change positively and responsibly for the benefit of Norwich as a whole. This includes actively promoting sustainable transport choices. For Castle Meadow the favoured approach is to promote flexibility and adaptability in the use of premises rather than indiscriminately protecting shops at the expense of other beneficial uses. We would also dispute the view that the independent retail sector is in decline, which fails to explain the demonstrable success of the Norwich Lanes in recent years, for example. It should be noted that Castle Meadow has no defined retail frontage, which means that it is not subject to any minimum set proportion of shopping to be sought. It does not imply that there is no retail activity in the street, which is clearly not the case. *No change.*
Mrs J M	Page 18-19 PR02 Castle Mall	Norwich is a vibrant cultural centre and lacks a purpose built symphony hall. Castle Mall has declined as a shopping centre at the expense of	**Accepted in part** – a symphony hall does not form part of the upgrading proposals being taken forward by the Mall operators and is unlikely to be an economically viable proposition. There may be some scope to expand and diversify the evening

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		Chapelfield and would benefit from promotion as a high quality mixed use destination incorporating such a facility alongside restaurants and quality retailers. Questions whether an 80% retail threshold for Norwich (sic) is sustainable.	economy and leisure offer within the upper and lower levels of the Mall (to complement the established cinema) where this would not compromise its core retail function. Policy DM23 of the DM Policies Plan does not normally accept leisure uses at ground floor level in defined retail frontages and this would preclude using levels 1 and 2 of Castle Mall for those purposes. It should be noted that the 80% retail threshold applies only to the main retail levels in the mall which are defined retail frontages and not to the upper and lower levels, where no minimum applies. *Reference added to "complementary leisure uses" in the third bullet point on page 19.*
Broadland District Council	General	The SPD does not appear to make reference to or provide guidance on retail uses outside the defined centres. Are [decisions on these proposals] to rely solely on the policy?	It is not intended to do so. The role of this SPD is clearly set out in the Local Development Scheme as providing detail to support policy DM20, which is concerned primarily with managing change <u>within</u> defined city centre shopping areas. Proposals for new development (including proposals in the centre but <u>outside</u> these areas) are assessed against a different policy – policy DM18. Appendix 4 of the DM Policies Plan gives more detail on the interpretation of "city centre" when determining proposals for main town centre uses: the Primary and Secondary retail areas together constitute the "city centre" for the purposes of assessing retail proposals under the sequential test whereas the most sequentially preferable location for leisure uses is the city centre leisure area. Assessment of city centre proposals would therefore take into account policy DM18 (in conjunction with appendix 4) in combination with policy DM20 and this SPD if the proposal was located in a defined retail area and policy DM19 in the case of proposals for, or resulting in the loss of, offices.

Respondent	Page/Para	Comment	Council response
Broadland District Council	General	The scale of the district centres has not been clearly defined in the SPD	**Not accepted:** As above. The SPD is not intended to define the scale of existing retail provision or development in district centres. However this is monitored through the shops database (and if required would be published in the city council's regular city centre and district and local centre retail monitors) rather than in SPD.
Broadland District Council	General	There is no guidance specifically covering the division of larger retail units (such as department stores) to smaller units.	**Not accepted:** Subdivision of larger retail units would generally be welcomed in most parts of the city centre if department and multiple stores became redundant. However generic guidance may be of little value as proposals would need to be approached case by case due to the complex site specific planning issues involved. The issue may however be revisited in future iterations of this SPD if more detailed consideration of the issue becomes necessary.
Norwich Business Improvement District (BID)	General	Generally speaking Norwich BID is comfortable with the documents proposals [subject to the comments made on specific paras] especially given the percentages Norwich City Council apply to A1 frontage can be adjusted each year outside of DM20 in the light of the evolving market and streetscape.	**Noted**. Norwich BID's general support for the SPD is welcome.
Norfolk County Council	General	Support broad policy approach as it aims to maintain and enhance the vitality and viability of the city centre both the primary and secondary areas. In particular the	**Noted.** Norfolk County Council's general support for the SPD is welcome.

Respondent	Page/Para	Comment	Council response
		county council supports: • Measures addressing the emerging evening economy; • Restrictions on betting shops and amusement arcades; • Measures to address high vacancy rates in Castle Meadow i.e. encouraging non-retail uses such as education, leisure, arts and entertainment uses; • Maintaining Elm Hill for speciality retailing and supporting the early evening economy; • The Lanes identified as a target area for independent shops.	
Norfolk County Council	Para 3.7, 3.9	The SPD would benefit from evidence justifying the need to retain "an indicative minimum of 80%" core frontage in the Primary Area. It is also unclear why other areas within the Primary Area have a reduced minimum core frontage percentage, such as: PR01 – Back of the Inns / Castle Street (65%); PR02 - The Lanes (70%); and PR06- Timberhill/Red Lion Street (60%). The above areas currently have higher ratios of retail frontage	The commentary for each of the frontage zones gives a general overview of how each area has been evolving and developing. Evidence to support this is recorded in the council's shops database and reported through the annual city centre retail monitor, albeit that the baseline for this monitoring now relates to different zone boundaries than previously. The SPD allows for the diversification of retail frontages, the introduction of additional supporting services and the promotion of certain areas for speciality shopping as required in policy 11 of the JCS. It is evident that a "one size fits all" approach for the primary area in the previous local plan (85% minimum A1 retail for all zones) is not fit for purpose as the retail representation in most of the zones defined in that plan is already below that level: some such as Back of the Inns are significantly below. The indicative

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		than proposed in the SPD without any real justification/reasons why a lower level/proportion is acceptable/desirable. For other areas the proportion of frontages which it is desirable for A1 retail will vary according to location. It is felt that there should be more explanation/evidence in the SPD as to how the proportions have been derived and why lower levels in these areas may be considered acceptable compared to other Primary Areas.	thresholds chosen reflect the city council's view of the potential to accommodate a more diverse range of services in different areas, with the main focus for retail remaining in the malls and core area focused on Gentleman's Walk, where the minimum has been set at 80% rather than 85% to allow for flexibility given the likely reduced representation of A1 retail use in the longer term.
Norfolk County Council	General	While reference has been made to the National Planning Policy Framework (NPPF) in the SPD, the city council will need to consider Government proposals set out in the CLG Technical Consultation on Planning (July 2014). In particular regard should be made to Section 2 on reducing planning regulations, inter alia, to support high streets. This includes proposals for allowing permitted development between A1 (retail) to restaurants and cafes (A3). If such proposals where to go ahead, then this could undermine	**Accepted:** *Commentary added at para 2.14 on the CLG technical consultation, which was issued after publication of the draft version of this SPD, as well as the implications of taking its proposals forward.* The city council acknowledges that implementation of the government's proposals for extended permitted development rights within class A has the potential to significantly undermine the SPD and has made this point in its formal response to the consultation. Should the proposals be implemented as suggested (most likely they would take effect from April 2015) the council would need to initiate a review of the SPD to ensure that it remained appropriate, or indeed was still capable of implementation.

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		the objectives set out in the SPD of maintaining defined levels of retail frontages in the City Centre.	
Norwich BID	General	Disputes the council's claims on Page 4 (1.2) and throughout the document that its planning policy has led to positive management of change of use and delivering vitality.	**Not accepted:** Although a positive and proactive planning policy is certainly not the sole contributor to a thriving city centre, the inference that planning has no role to play is not accepted. A positive local planning strategy is part of a range of management measures to secure continued town centre vitality, thereby helping to foster a successful and attractive trading environment and putting the local conditions in place that help to support and sustain city centre business for the long term. That approach is fundamental to national planning policy which the local plan (and this SPD) must reflect. Historically, positive planning policies for the city centre ensured that permission could be refused (and refusals upheld on appeal) for forms of development which would fundamentally damage it, such as the major out of town retail centres being promoted in the Norwich area in the early 1990s. The council would argue that having such a strategy in place has ensured that beneficial development and investment to support the city centre has been allocated and delivered in the right places and at the right times – and without such a strategy, Norwich would now be a very different place. *Commentary revised to make clear that planning is one contributor to a successful town centre strategy.*
Norwich BID	Page 3 (Summary)	The summary should refer to ensuring the best mix of offer for city centre vitality - not just an aspiration to restrict loss of retail	**Accepted:** *Reference to seeking the most beneficial mix of uses is added in the Summary in the context of JCS Policy 11.* However the maintenance of retail function in key areas is an important element of that strategy and that will be sought principally through policy DM20.

Respondent	Page/Para	Comment	Council response
Norwich BID	Page 4 (para 1.2):	Policy 11 of the JCS is out of date - there is no prospect for 'a substantial expansion of comparison retail floor space …'; such an unrealistic aspiration should not be referred to.	**Noted:** The reference in JCS Policy 11 to a substantial expansion of comparison retail in the city centre is based on 2007 study evidence and growth forecasts which were considered robust at the time the JCS was examined in 2010, but have clearly been overtaken by more recent retail trends. The evidence will need to be revisited in the near future as part of an overall review of the evidence base informing a wider review of strategic policy. However, as JCS Policy 11 is in an adopted local plan (which the DM Policies Plan and this SPD is required to implement) it is not legally possible at this stage to change what it says, nor to disregard it completely. However, it is accepted that the SPD is concerned principally with the management of uses in general and not with the promotion of new development, so a reduced emphasis on this part of the policy is appropriate. *Text revised to acknowledge that there is a limited prospect of further retail expansion in the centre and to place more emphasis on the need for diversity and flexibility.*
Norwich BID	Page 6 (para 2.4):	Would be useful to understand how the "map" [i.e. the local plan policies map showing the extent of the retail frontage zones] has changed and been redrawn, to ensure that old mistakes or new changes are appropriate	**Accepted**. *Additional commentary provided at paragraph 3.8 (and cross referenced in paragraph 2.4) to list the main changes in frontage zone definitions compared with those in the 2004 local plan. These are illustrated in new Figure 2.* Note that the zone boundaries themselves are not determined by this SPD, they have already been negotiated and established through the process of preparing, consulting on and independently examining the DM Policies Plan. They cannot be changed other than by a review of that plan.
Norwich BID	Page 7 (para 2.8):	Queries the source of the shops database and how it is tracked.	**Accepted:** *Commentary provided at paragraph 2.8 with more detail about*

Respondent	Page/Para	Comment	Council response
		Refers to incomplete coverage in BID's database derived from business rates data.	*the shops database and how it is used for monitoring.*
Norwich BID	Page 9 (para 2.13):	Is it possible or correct to object based on conservation grounds, when it is not a designated conservation area? This may need to be reviewed.	**Not accepted:** This comment appears to be based on a misapprehension. The whole of Norwich city centre within the line of the medieval walls, covering an area of 230ha, is a Conservation Area (formally designated in October 1992). With the exception of Riverside (**LD02**) and Sainsbury's at Brazen Gate (**SR06**), all the individual zones subject to this SPD fall within the City Centre Conservation Area. The point here is that the reasons for refusal of planning permission for a change of use which required permission *only* because the premises concerned were in a Conservation Area would need to place significant weight on the conservation issues over and above other factors. *Additional commentary provided to clarify these points.*
Norwich BID	Page 9 (Para 2.14):	Supports government proposal for betting shops to be "sui generis" [i.e. a separate use in law] and therefore allowing challenge as part of any change of use proposal.	**Noted**, although the proposal in the CLG *Technical Consultation on Planning* (issued in July 2014 after the draft SPD was published) was to retain betting shops and payday loan stores in a much reduced A2 use class, rather than making them sui generis. In its formal response to that consultation, the council suggested that a sui generis option would be more effective. *Commentary at paras 2.13 and 2.14 updated and to refer to the introduction of further deregulatory changes by revisions to the General Permitted Development Order in April 2014 and the CLG technical consultation proposals published for consultation in July 2014.*

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Norwich BID	Page 10 (Para 3.1):	[City shopping areas] were previously monitored every six months: can this be reviewed and reinstated, better reflecting changes in the city.	**Noted:** Following a review of staffing levels for budgetary reasons, the city council's planning service is no longer resourced sufficiently to undertake these surveys at six monthly intervals. The council would be happy to investigate means of resourcing more frequent surveys with the BID, but this would need to be at nil additional cost to the council. *Commentary added at para 3.3 re the scope for increasing the frequency of the survey.*
Norwich BID	Page 26 (PR01 Back of the Inns):	The BID will not fund street repairs and this inference should be removed, no public realm funding has been agreed in the 5 year business plan	**Noted and accepted**. *Reference to the BID business rate levy is deleted.*
Norwich BID	Page 27 (PR02 The Lanes West):	Would like to see support for change of use in London Street on the upper floors for holiday accommodation, such as holiday lets, hotels or apartments. Something in here to reflect the aspiration to be a high end shopping offer in London Street and dissuade charity shop use.	**Accepted in part**: There is much potential for additional visitor accommodation in the city centre and it would usually be appropriate to encourage the beneficial reuse of redundant upper floors for that purpose – although in many cases individual holiday lets would fall within the same planning use class as general needs housing. The aspiration for high end shopping in London Street is welcome but realistically this could not be delivered through planning powers (retail being a generic planning use with no distinction between types of shopping). Such an initiative would rely on partnership working with proactive management of retail lettings and positive marketing. However the council supports this idea in principle. *Text amended to refer to the potential for visitor accommodation and prestige retailing.*

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Bidwells for Aviva	Page 32 (PR03 St Stephens Street/Westlegate):	Reference to "focusing the majority of retailing in St Stephens Street" should be deleted: this would not allow for flexibility in promoting a diversity of uses in future across the zone as a whole.	The historic development of St Stephens Street means that in practical terms there are more large shop units, and consequently significantly more retail floorspace, than in Westlegate. These larger units may not lend themselves so readily to reuse for other purposes. Retention of high profile shopping in St Stephens Street is also important because of its enhanced role as a public transport hub. However, it is acknowledged that John Lewis is also a major retail presence at the other end of the zone, Seeking to concentrate retail in St Stephens might imply that less importance would be afforded to retaining John Lewis, which is not the intention. On balance therefore the suggestion is **accepted.** *Reference to "focusing the majority of retailing in St Stephens Street" deleted from bullet point 1.*
Norwich BID	Page 35 (PR04 Castle Meadow North)	There needs to be a presumption for increased residential on Castle Meadow North.	**Not accepted:** Residential uses would be welcomed here in appropriate cases (for example conversion of redundant office space which is no longer suitable for commercial occupation). Where permission is required, the suitability of individual premises for housing would need to be assessed on a case by case basis against other relevant local plan policies to ensure adequate standards of amenity and outlook could be achieved and the impacts of any retained commercial uses mitigated. *No change.*
Norwich BID	Page 48 (SR03 St Benedicts Street):	Rather than discouraging residential in St Benedicts it should be encouraged	**Not accepted:** The SPD encourages residential use in St Benedicts but acknowledges that it may not always be suitable at ground floor level. There are instances where the occupation of former retail premises for housing directly onto the street frontage would not deliver an acceptable living environment for residents due to poor outlook, traffic impact, cramped internal

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			layout and inadequate waste storage/servicing, etc. Residential use would also result in areas of dead frontage which would break up the coherence and continuity of the historic shopping frontage. Such proposals would therefore need to be approached case by case but residential conversion could be prioritised where there are high levels of vacancy and little prospect of commercial reoccupation. *Text amended to delete "(including residential use)" in bullet point 4.*
Norwich BID	Page 52 (SR04 Elm Hill/Wensum Street):	Policy should be neutral on the issue of residential in Elm Hill and Wensum Street.	**Accepted**. The council considers that the vitality and visitor appeal of Elm Hill as a speciality shopping area (identified as such in the JCS) rests on maintaining an active and diverse mixed use frontage with a good representation of commercial uses. This stance, supported by current and previous local plan policy, has been upheld on appeal. However the loss of active frontage may be due to a number of factors and it is unreasonable to single out residential use in this context. Residential use would continue to be supported where it did not have a significant impact on character and retail function and where housing could be accommodated consistent with other policies of the plan. *Text amended to delete "(including residential use)" in bullet point 4.*
Norwich BID	Page 55 (SR05 London Street East):	As above points made for page 27 London Street would have the aspiration for a joined up approach for accommodation and dissuade charity shop use	**Accepted:** Comments as above against zone PR02. *Additional commentary to make reference to aspiration for prestige high end retail and suitability for visitor accommodation.*
Norwich BID	Page 58:	Rather than discouraging residential in this area (Magdalen / St Anglia Sq) it should be encouraged	**Not accepted:** Comments above as for SR03 St. Benedicts Street. The intention is not to discourage residential here per se but acknowledge that it may not always be appropriate at ground

Respondent	Page/Para	Comment	Council response
			floor level and each proposal must be assessed on a case by case basis taking account of other policies of the plan. *No change.*