

Anglia Square
including land and buildings to the north and west

PROOF OF EVIDENCE
of
CHRIS WATTS MTCP MRTPI

on town centre and retail impact matters,

on behalf of the Applicant,

Weston Homes PLC and Columbia Threadneedle Investments

December 2019

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CONTENTS

	Page
List of Appendices	3
Qualifications and Experience	4
1. Executive Summary	5
2. Scope of Evidence	6
3. The Government's Policy for Town Centres	7
4. Anglia Square and the Application Proposals	9
5. Hierarchy of Centres and the Policy Context	16
6. Norwich City Centre and Impact Matters	25
7. Summary and Conclusions	37

LIST OF APPENDICES

(separately bound)

Appendix CW1: Illustrative retail strategy plan

Appendix CW2: Norwich City Centre comparison goods market share plan

Appendix CW3: List of arts and cultural amenities in Norwich City Centre

QUALIFICATIONS AND EXPERIENCE

I am Chris Watts and I hold a Master's degree in Town & Country Planning from the University of Manchester.

I am a Member of the Royal Town Planning Institute.

I am a Director of the National Retail Planning Forum and a Member of its Research Group.

I am an Associate in the Cushman & Wakefield (**C&W**) Planning & Development team, where I have been employed since October 2011 (DTZ previous to the merger with C&W in September 2015).

I have been professionally engaged in town planning and development for over 12 years, all of which have been in private consultancy practice. During this period, I have had significant experience of advising both private and public sector clients on town centre and retail impact matters, as well as planning matters generally.

I have been advising Columbia Threadneedle Investments (**CTI**) on the Anglia Square proposals and other matters since 2015. I am therefore familiar with the application site, Anglia Square/Magdalen Street Large District Centre and Norwich City Centre.

1. EXECUTIVE SUMMARY

- 1.1 The expert evidence that I shall give will demonstrate that the proposed development is consistent with Chapter 7 of the National Planning Policy Framework (**Framework**), which sets out the Government policies for ensuring the vitality of town centres.
- 1.2 Evidence will also be presented demonstrating that the proposed development is consistent with Norwich City Council's development plan policies relating to town centres and retail, supplementary guidance and other relevant documents.
- 1.3 Specifically, my evidence will set out that:
- 1.4 **First**, the application site is a 'town centre' in Framework terms, and it is Government policy to ensure the vitality of town centres.
- 1.5 **Second**, Anglia Square is a principal but declining part of the Large District Centre. The retail offer, which is focused towards discount/value retailing, lacks diversity and the site has virtually no leisure facilities. It does not currently fulfil its role as the focus of the Large District Centre.
- 1.6 **Third**, there is long-standing policy support for a major mixed use redevelopment of Anglia Square including the enhancement of its retail and leisure offer.
- 1.7 **Fourth**, the set of planning conditions agreed between the Council and the Applicant will ensure the scheme comprises less floorspace dedicated to main town centre uses, and A1 retail, than currently accommodated at the site. Notwithstanding, the complementary mix of retail and non-retail uses will enhance the function of the Large District Centre.
- 1.8 **Fifth**, Norwich City Centre has a significant quantum and variety of retail and leisure/cultural attractions. It functions as a regional and multi-purpose 'destination', while the application proposals will have a different and complementary function. To that end:
- 1.9 **Sixth**, the retail and leisure components of the scheme will not result in a significant adverse impact on the City Centre's overall vitality and viability.
- 1.10 **Seventh**, the proposed development will not challenge the regional role of Norwich City Centre or alter its dominant position at the apex of Greater Norwich's hierarchy of centres.

2. SCOPE OF EVIDENCE

- 2.1 In setting out his decision to call-in the application 18/00330/F, the Secretary of State identified the matters upon which he wishes to be informed. These included:
- The extent to which the proposed development is consistent with the Government policies for ensuring the vitality of town centres (Chapter 7 of the Framework); and
 - The extent to which the proposed development is consistent with the development plan for the area including any emerging plan.
- 2.2 My evidence on town centre and retail impact matters therefore deals with these considerations.
- 2.3 I note that paragraphs 224-257 of the Council's committee report for the application¹ address matters relating to my evidence. It is common ground between the Council and the Applicant that these paragraphs present an accurate assessment of the proposed development and its retail impact.
- 2.4 My evidence is structured as follows:
- Section 3 – outlines the Government's policy for ensuring the vitality of town centres.
 - Section 4 – describes Anglia Square today and its proposed scale and function.
 - Section 5 – sets out the hierarchy of centres and reviews the local policy context as relevant to my evidence.
 - Section 6 – considers the scale and function of Norwich City Centre and its vitality and viability, and demonstrates that the proposed development will not have a significant adverse impact (or alter the City Centre's role in the hierarchy of centres).
 - Section 7 – provides a summary of my evidence.

¹ CD 9.1

3. THE GOVERNMENT'S POLICY FOR TOWN CENTRES

3.1 It is common ground between the Council and the Applicant that the application site falls within Anglia Square/Magdalen Street Large District Centre, as defined on the Council's adopted Policies Map (December 2014).

3.2 It is therefore a 'town centre' in Framework terms.

3.3 'Ensuring the vitality of town centres' is the Government's overarching policy for town centres. The policy is recognised in paragraphs 85-90 of the Framework and is a material consideration in the determination of the application.

3.4 Notwithstanding a key policy 'test' is the impact of a proposal on (other) centres², which I deal with in section 6 of my evidence in regard to Norwich City Centre, paragraph 85 of the Framework is clear that:

Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (my emphasis).

3.5 The remainder of that paragraph elaborates on what this entails, including the need to:

(a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

3.6 The flexibility afforded by policy for town centres to 'grow' and (in particular) 'diversify' seeks to address the declining health of many town centres across the UK. Indeed, the Government launched its *High streets and town centres in 2030* inquiry in May 2018, with the select committee charged with identifying a series of interventions for large-scale structural change. It concluded:

If action is not taken now we strongly believe that the future will see high streets and town centres with an increasing prevalence of empty

² Paragraph 89 of the Framework [CD1.1] with detailed guidance set out in the 'Town centres and retail' section of the Planning Practice Guidance (updated 22 July 2019).

shops, dereliction, deteriorating infrastructure and a loss of customers who will take their trade elsewhere. We are concerned that this will lead to some towns centres and high streets effectively closing down altogether, most likely disproportionately affecting people on lower incomes who have less opportunity to shop elsewhere. We therefore urge the Government, local government, retailers, landlords and the local community to act on our conclusions and recommendations now in order to save the high street and ensure its long-term sustainability for future generations to come³.

- 3.7 This statement underscores the fragile nature of town centres and the risks of inaction and, I believe, is pertinent to this call-in inquiry. The application site is a declining centre with a history of failed attempts to deliver mixed use redevelopment. The proposals seek to reverse this spiral of decline and ensure the vitality of the Large District Centre as sought by Government policy.

³ High streets and town centres 2030: Eleventh Report of Session 2017-19, February 2019 (paragraph 172) [CD2.23].

4. ANGLIA SQUARE AND THE APPLICATION PROPOSALS

Anglia Square today

- 4.1 Anglia Square shopping centre is *around one mile north of the central area* of Norwich City Centre and *secondary in both appearance and in its retail offer*⁴, which is *towards the discount/value end of the spectrum*⁵. It therefore provides:

*...a different and more localised retail offer to the primary retail functions and fashion-led shopping centres of Castle Mall and intu Chapelfield, serving the convenience needs of the largely residential areas to the north, east and west*⁶.

- 4.2 The application site comprises a substantial quantum of retail and other town centre floorspace, as shown in Table 1 below, which is common ground between the Council and the Applicant.

Table 1 – Floorspace schedule, Application Site

Use Class	Existing floorspace (sqm GIA)	Vacant (sqm GIA)
A1	8,981	1,724
A3/A4/A5	106	0
Sui Generis (Former Twilight Nightclub)	958	958
Sui Generis (Anglia Square Cars)	2,172	0
Sui Generis (Coral Racing)	123	0
Sui Generis (Car Wash)	583	0
Total Class A & Sui Generis	12,923	2,682
B1	16,161	11,209
D1	780	0
D2	2,577	2,577
TOTALS	32,441	16,468

Source: Statement of Common Ground.

- 4.3 I note that the majority of occupied B1 floorspace comprises the artist studios in Gildengate House (amounting to 4,786 sqm GIA), which is a

⁴ PMA PROMIS Retail Report for Norwich, October 2019 [CD2.22].

⁵ Paragraph 5.22 of the TCRS [CD2.9(a)].

⁶ Paragraph 3.3 of the PGN [CD2.11].

temporary arrangement and subject to flexible lease terms between CTI and Outpost.

4.4 It is further common ground between the Council and the Applicant that the shopping centre has *a range of retail units including large format stores occupied by QD [3,356 sqm GIA], Iceland⁷ [821 sqm GIA] and Poundland [1,324 sqm GIA] and smaller units occupied by a mix of national and independent retailers⁸.*

4.5 The application site comprises 26 (Class A) retail units. A1 retailers occupy 25 of these, including the national 'multiples' of Boots, Greggs, Poundland, Savers and Shoe Zone; each of which are represented in the central area of Norwich City Centre⁹.

4.6 These national retailers help to support a high take-up of retail units for smaller, independent businesses; indicating that *the centre at its core serves a successful purpose for its immediate catchment¹⁰.*

4.7 Notwithstanding, in qualitative terms, the existing retail offer is limited and has declined in recent years. Paragraph 5.2 of the Policy Guidance Note (**PGN**) for Anglia Square¹¹ accurately describes the current limitations of Anglia Square as part of the Large District Centre. It says:

The current retail centre is easily accessible and well located but lacks a critical mass, diversity of tenants and is influenced by the degraded physical environment in the area. Café and restaurant offers are limited, the cinema [now vacant] is poorly integrated and much of the development is below market standard. Furthermore the night-time economy is limited with few shops/services open after standard shopping hours.

4.8 The PGN goes on to promote:

⁷ Lies outside the application site.

⁸ Paragraph 5 of the Statement of Common Ground.

⁹ Boots at Castle Quarter and INTU Chapelfield; Greggs at London Street, St Stephens and White Lion Street; Poundland at Castle Mall and St Stephens; Savers at St Stephens; and Shoe Zone at Orford Place and St Stephens.

¹⁰ Retail Strategy Report (Revision A), August 2018 [CD7.7].

¹¹ CD2.11

*Enhancement of a strong and diverse District Centre function, serving the wider suburban areas of North Norwich, an improved convenience offer, and enhanced leisure offer with a new cinema, cafes and restaurants...*¹²

- 4.9 It adds that the existing Anglia Square shopping centre does not meet this role¹³.

The proposed scale and function of Anglia Square

- 4.10 Planning permission is sought for up to 11,000 sqm GEA of ground floor flexible commercial floorspace, comprising:
- up to 9,850 sqm GEA for Use Classes A1/A2/A3/A4/B1/D1/Sui Generis; and
 - up to 1,150 sqm GEA for Use Classes A1/A2/A3/A4/B1/D1.
- 4.11 A cinema (3,400 sqm GEA of D2 floorspace) and hotel (11,350 sqm GEA of C1 floorspace) is also proposed.
- 4.12 The application proposals therefore comprise up to 25,750 sqm GEA of main town centre uses.
- 4.13 A retail strategy for the 9,850 sqm GEA of ground floor flexible commercial floorspace was developed by C&W in consultation with the Council to support the application. This is CD7.7 and includes an illustrative plan (also provided at Appendix CW1) showing the broad strategy for this proposed floorspace, together with the existing accommodation to be retained by CTI as part of the overall scheme.
- 4.14 Flexibility for a range of uses is required to help 'future proof' the proposed development and support its long-term vitality and viability. This is particularly necessary given the structural changes in retailing, which have enhanced the role and importance of a diversity of retail and non-retail uses.
- 4.15 To that end, the retail strategy seeks to support:

...a diverse and complementary mix of uses, including a replacement cinema, hotel (at the junction of St Crispin's Road and Pitt Street) and

¹² Paragraph 5.4 of the PGN [CD2.11].

¹³ Paragraph 6.6 of the PGN [CD2.11].

the flexibility for community facilities and offices, alongside an improved retail and leisure mix. It will complement Norwich City Centre and help to enhance the function of the Large District Centre¹⁴.

- 4.16 More detail on the mix of uses is set out under section 6 (Proposed Scheme Mix) and section 7 (Critical Design Considerations) of the retail strategy¹⁵. The latter section provides indicative unit numbers and sizes by use.
- 4.17 The additional 1,150 sqm GEA of ground floor flexible commercial floorspace does not form part of the retail strategy prepared by C&W. It is intended that such floorspace – focused around the edges of the scheme fronting Edward Street, New Botolph Street and Pitt Street respectively – will provide *discounted commercial floorspace [for] small/medium sized enterprise (including social enterprises, charities, not for profit organisations and artists' studios) or start-up businesses...secured through a S106 obligation¹⁶.*
- 4.18 A set of planning conditions have been agreed between the Council and the Applicant¹⁷ to control the scale and mix of the 9,850 sqm GEA of ground floor flexible commercial floorspace (i.e. the focus of the retail strategy set out above). Those of particular relevance to my evidence are:
- Condition 11 – requiring the provision of a foodstore (A1) within Phase 1, measuring at least 800 sqm GIA with no more than 20% of the net sales area dedicated to the sale of non-convenience goods;
 - Condition 17 – requiring the provision of A3/A4 floorspace totalling no less than 1,500 sqm GIA and no more than 3,500 sqm GIA, with at least 75% of such floorspace within the 'Leisure' square as identified on the illustrative plan at Appendix CW1;
 - Condition 16 – requiring the provision of specified sui-generis use (betting offices) limited to a maximum of 250 sqm GIA;
 - Condition 19 – requiring the provision of a minimum of 5 No. units measuring between 75-150 sqm GIA and 5 No. units measuring between 150-250 sqm GIA;

¹⁴ CD7.7, page 1.

¹⁵ CD7.7, pages 4-7.

¹⁶ Paragraph 271 of the Council's committee report [CD9.1].

¹⁷ As attached to the Council's Statement of Case.

- Condition 61¹⁸ – permitted development restrictions in relation to the creation of additional flexible commercial floorspace (including mezzanines);
- Condition 62 – permitted development restrictions in relation to the change of use of A3 floorspace to A1 or A2, which results in less than 1,125 sqm GIA of A3/A4 floorspace within the 'Leisure' square as identified on the illustrative plan at Appendix CW1; and
- Condition 63¹⁹ – permitted development restrictions in relation to the change of use of floorspace within A1, B1 and specified sui-generis use (betting offices) to C3.

4.19 These planning conditions ensure the proposals will (i) be commensurate with the role and function of Anglia Square as part of the Large District Centre and (ii) have no significant adverse impact on Norwich City Centre²⁰, as demonstrated in section 6 of my evidence.

4.20 The Council's committee report²¹ (paragraphs 234-235) sets out the planning conditions respond to the objections made to the application on retail grounds, including by the owners of INTU Chapelfield²² and Castle Mall²³. The objections of both shopping centre owners, I note, related to the potential scale of retail, leisure and other main town centre uses; while the owners of INTU Chapelfield expressed particular concern for the amount of A1 comparison goods floorspace within the scheme.

4.21 I believe these objections, insofar as they challenge the potential scale of development, are not justified for the following reasons:

- As I set out in section 5 below, there is no development plan policy restricting the quantum of main town centre uses at the application site;

¹⁸ Relates also to the 1,150 sqm GEA of ground floor flexible commercial floorspace.

¹⁹ Relates also to the 1,150 sqm GEA of ground floor flexible commercial floorspace.

²⁰ Common ground between the Council and the Applicant (see point 63, Table of areas of agreement/disagreement in the Statement of Common Ground).

²¹ CD9.1

²² CD21.2

²³ CD21.1

- Table 1 above confirms that the application site currently comprises a substantial quantum of retail and other town centre floorspace, amounting to some 32,441 sqm GIA (say 34,063 sqm GEA²⁴); and
- The application proposals comprise up to 25,750 sqm GEA of main town centre uses, well below the existing quantum of such floorspace at the site.

4.22 Looking specifically at the A1 retail; by implication of Condition 17, which requires no less than 1,500 sqm GIA (say 1,575 sqm GEA) of A3/A4 floorspace, only up to 8,275 sqm GEA of the 9,850 sqm GEA of ground floor flexible commercial floorspace can be occupied by A1 retail²⁵.

4.23 This compares with the 8,981 sqm GIA (say 9,430 sqm GEA) of A1 retail currently at the application site²⁶.

4.24 I further submit that, given Condition 11 requires a foodstore (at least 800 sqm GIA or say 840 sqm GEA), the potential scale of A1 comparison goods floorspace will be 7,435 sqm GEA²⁷.

4.25 I note that the Norwich Over the Water Group has put forward the idea of a concert hall – specifically a Tudor theatre – at Anglia Square²⁸. This does not form part of the application proposals and in section 6 below, I demonstrate that Norwich City Centre is very well represented by arts and cultural amenities.

4.26 Notwithstanding, the application proposals do comprise a vibrant mix of uses (and spaces) capable of supporting creative occupiers and events. In particular:

- i. the discounted commercial floorspace for SMEs or start-up businesses (as set out in paragraph 4.17 above);

²⁴ Assuming a GEA:GIA ratio of 5% in accordance with the HCA's Employment Density Guide (November 2015) [CD2.24].

²⁵ Or, up to 9,425 sqm GEA in the unlikely event that the full amount of additional 1,150 sqm GEA of ground floor flexible commercial floorspace is occupied by A1 retail (given it comprises discounted commercial floorspace for SMEs or start-up businesses).

²⁶ Table 1 of my proof.

²⁷ Or, up to 8,585 sqm GEA allowing for the 'discounted' additional 1,150 sqm GEA of ground floor flexible commercial floorspace.

²⁸ CD17.1

- ii. the two public squares – Anglia Square and the larger St George’s Square – providing opportunities for art and outdoor events; and
- iii. the ‘Under the Flyover’ scheme, which has planning permission²⁹ and comprises pre-fabricated shipping containers for flexible uses, market stalls and event space. This ‘meanwhile use’ would be delivered subject to the section 106 agreement being negotiated for the current application.

²⁹ Application ref. 18/00956/F.

5. HIERARCHY OF CENTRES AND THE POLICY CONTEXT

The Development Plan

5.1 The adopted development plan, as relevant to my evidence on town centre and retail impact matters, comprises:

- Joint Core Strategy (**JCS**) (January 2014)
 - Policy 11: Norwich City Centre
 - Policy 19: The hierarchy of centres
- Norwich Development Management Policies Local Plan (**DMP**) (December 2014)
 - Policy DM18: Promoting and supporting centres
 - Policy DM20: Protecting and supporting city centre shopping

5.2 The adopted Policies Map (December 2014) confirms the following:

- i. the application site falls within the Norwich City Centre boundary;
- ii. the application site falls within the Anglia Square/Magdalen Street Large District Centre boundary; and
- iii. the ground floor shops forming Anglia Square shopping centre, plus the shops fronting Magdalen Street to the east of the application site, are identified as Defined Retail Frontage.

Joint Core Strategy³⁰

5.3 Policy 11 sets out the Council's development strategy for Norwich City Centre – which includes the application site. It states:

The regional centre role will be enhanced through an integrated approach to economic, social, physical and cultural regeneration to enable greater use of the city centre, including redevelopment of brownfield sites. It will be the main focus in the subregion for retail, leisure and office development.

5.4 Of relevance to my evidence, Policy 11 goes on to say that Norwich City Centre's regional centre role will be promoted by (inter alia):

³⁰ CD2.2

- *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;*
- *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;*
- *expanding its function as an employment centre, including provision of high quality office premises and a diversity of uses across the area.*

5.5 Policy 11 also refers to the Northern City Centre which, it says, will be comprehensively regenerated in accordance with its Area Action Plan; which has since expired. However, its aspiration for a major mixed use redevelopment of Anglia Square remains part of the adopted development plan by virtue of Policy 11 and specifically its key diagram³¹.

5.6 Policy 19 defines a hierarchy of centres for Greater Norwich. The hierarchy comprises four tiers, or *Categories*, as follows:

- 1) Norwich City Centre
- 2) Towns and Large District Centres
- 3) Large Village and District Centres
- 4) Local Centres

5.7 Norwich City Centre's primary retail area (defined on the Policies Map) is *at the highest level in the retail hierarchy*³² and the Large District Centres are Anglia Square/Magdalen Street and Riverside.

5.8 Supporting paragraph 6.70 states that:

The hierarchy of centres reflects the functions of and catchments served by each centre, the availability of offices, leisure, shops and services and their potential to accommodate growth as assessed by background evidence studies. Categories 1 and 2 respectively group the largest centres of Norwich and the Main Towns (plus large district centres) which serve notable urban and rural catchments and have potential for additional employment, leisure and shopping uses.

³¹ Page 73 of the JCS.

³² Paragraph 6.74 of the JCS.

- 5.9 In order to protect this hierarchy of centres, Policy 19 advises that:

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

Norwich Development Management Policies Local Plan³³

- 5.10 Policy DM18 states that development for retail, leisure and other main town centre uses (including hotels) will be permitted within Large District Centres, provided its *scale is appropriate to the centre's position in the hierarchy as set out in JCS policy 19 and does not exceed the indicative thresholds set out in Appendix 4.*
- 5.11 Appendix 4 of the DMP sets no specific floorspace threshold for Large District Centres which, to my mind, means that the appropriateness of scale is the relevant 'test' of Policy DM18 in determining the application proposals. Whilst there is no such test in the Framework, I accept that scale is a relevant consideration relating to matters of hierarchy.
- 5.12 Policy DM18 requires proposals for main town centre uses to be *justified by a sequential site assessment (and where applicable, impact assessment) applying to the scale of development proposed.* A sequential site assessment is not required in this case, on the basis the application site forms part of Anglia Square/Magdalen Street Large District Centre and its defined retail frontage³⁴.
- 5.13 In respect of impact assessments, the policy goes on to say that such assessments must demonstrate:
- ...the proposal would not result in a significantly harmful impact on the vitality and viability of the city centre or other existing and proposed centres, would not compromise committed proposals for their expansion and would not significantly undermine prospects for their regeneration, improvement or enhancement (my emphasis).*
- 5.14 Whilst I accept the general principle of this test, I note that the wording (as emphasised above) is not entirely consistent with the Framework,

³³ CD2.3

³⁴ Paragraph 86 of the Framework [CD1.1] sets out the sequential test to *planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.*

which sets out that application proposals should not have 'significant adverse impact' on one or more of the considerations in paragraph 89 of the Framework, namely:

- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).*

5.15 Policy DM20 seeks to manage changes of use in the Large District Centres and their defined retail frontages (inter alia). Whilst not directly relevant to the application proposals in my opinion – given the existing Anglia Square shopping centre will be demolished and replaced with new accommodation – the policy provides a guide for the mix of retail and other uses at ground floor level in particular. It is supplemented by the 'Main town centre uses and retail frontages SPD' considered below.

5.16 However, as I set out in paragraph 4.14 above, flexibility for a range of uses is important to support the long-term vitality and viability of the proposed development. This is recognised by changes to permitted development rights³⁵ and also the new Framework, which removes the definition of both primary frontages (i.e. a high proportion of retail uses) and secondary frontages (i.e. a diversity of uses).

Emerging Local Plan

5.17 The Council is working with Broadland District Council, South Norfolk District Council and Norfolk County Council to prepare the new Greater Norwich Local Plan (**GNLP**). However, at the date of submitting my proof, the Regulation 18 Draft GNLP has not been published.

Supplementary Guidance and Evidence Base Documents

5.18 In addition to the adopted development plan, the following documents are relevant to my evidence.

³⁵ The Town and Country Planning (Permitted Development, Advertisement and Compensation Amendments) (England) Regulations 2019 allow greater change of use to support high streets to adapt and diversify.

Anglia Square and surrounding area: Policy Guidance Note³⁶

- 5.19 The PGN was published in March 2017. It was prepared by the Council with the Applicant.
- 5.20 Whilst not forming part of the statutory development plan, it was subject to public consultation and was approved by Cabinet as non-statutory guidance to assist with the comprehensive redevelopment of the application site. It sets out the broad principles of development for the site and provides guidance on a range of issues.
- 5.21 Of relevance to my evidence, the PGN confirms that Anglia Square has a wider than local function; *serving an important role in terms of the convenience and comparison needs of the northern part of the city³⁷.*

- 5.22 Noting the limitations of the existing shopping centre, the PGN states that:

Potential exists to deliver a significant mixed use quarter and to transform the existing retail offer with more and improved format stores, alongside the addition of an enhanced leisure role and a greater provision of food and drink outlets that operate across a far wider period of time than exists at present³⁸.

- 5.23 This is translated into a proposed vision for the redevelopment of Anglia Square, including:

Enhancement of a strong and diverse District Centre function, serving the wider suburban areas of North Norwich, an improved convenience offer, and enhanced leisure offer with a new cinema, cafes and restaurants to continue the use of area into the evening³⁹.

- 5.24 The proposed objectives are set out under paragraph 5.5 of the PGN and those relating to the enhancement of the Large District Centre are:

- *revitalise the retail and service provision of Anglia Square as a key element of the Large District Centre serving the wider area of North*

³⁶ CD2.11

³⁷ Paragraph 3.2 of the PGN.

³⁸ Paragraph 5.2 of the PGN.

³⁹ Paragraph 5.4 of the PGN.

Norwich, with commercially attractive retail units based around an appropriate shopping circuit to maximise footfall to all units and thus ensure the long term viability of the retail offer, and acting as a catalyst for the wider economic regeneration of the northern city centre;

- *provide enhanced tourism, arts and cultural provision including potential for hotel and student accommodation, as well an enhanced evening economy that will include restaurants, cafes, bars and a cinema.*

Main town centre uses and retail frontages SPD⁴⁰

5.25 This SPD (December 2014) is intended to support DMP Policy DM20 and JCS Policy 11. It seeks *to maintain an indicative minimum of 60% of defined retail frontage [within Anglia Square/Magdalen Street Large District Centre] in A1 retail use*, aimed at ensuring the vitality, viability and retail function of the Large District Centre.

5.26 Within the Large District Centre, the SPD further seeks to (inter alia):

- support proposals for speciality and local independent retailing complementary to the retail function of the area;
- support the expansion of hospitality uses supporting the evening economy and other complementary main town centre uses;
- discourage concentrations of non-retail uses at ground floor level which would result in continuous runs of inactive frontage;
- support complementary uses in upper floors, including residential use.

Greater Norwich: Town Centres & Retail Study (Volume 1: Main Report)⁴¹

5.27 The Town Centres & Retail Study (**TCRS**) prepared by GVA was published in October 2017.

5.28 I note that the TCRS is intended to guide the future development of the Greater Norwich area over the period to 2036. The work will inform the new GNLP and *specifically focuses on identifying the future requirements*

⁴⁰ CD3.6

⁴¹ CD2.9(a)

in respect of retail needs, and sets out a strategy for how these requirements should be assessed⁴².

- 5.29 The TCRS refers to the hierarchy of centres set out in JCS Policy 19. Of the Large District Centres, it states that:

Anglia Square/Magdalen Street and Riverside are second tier centres which also fall within the central [City Centre] area which combine a district shopping centre role (meeting essentially local shopping needs) with more specialist comparison and convenience shopping facilities sometimes serving a somewhat broader catchment⁴³.

- 5.30 In respect of retail needs, Table 8.3 of the TCRS identifies a comparison goods floorspace requirement of 11,100-15,000 sqm net by 2027 in the Norwich urban area. The TCRS suggests there is *no quantitative need for any additional convenience goods floorspace to be planned for in the Norwich urban area over the period to 2027⁴⁴*; although there are qualitative considerations that support enhanced provision at Anglia Square.

- 5.31 The TCRS includes 'healthcheck' assessments of Norwich City Centre and Anglia Square/Magdalen Street Large District Centre. A summary of the vitality and viability of the Large District Centre is provided in the bullets after paragraph 5.34 (inter alia):

- The [Anglia Square] shopping centre is aesthetically unpleasing and performs a retail function which is little more than functional, but positively does benefit from some reasonably-sized units;*
- The 'anchor' stores to the centre are relatively poor;*
- Proposals for redevelopment of the centre are long-standing and should remain a priority for Norwich City Council over the new GNLP period;*
- The main qualitative gap is the lack of consumer choice for food shopping [whilst noting that] there may no longer be market appetite for a large supermarket at this location.*

⁴² Paragraph 1.4 of the TCRS.

⁴³ Paragraph 2.30 of the TCRS.

⁴⁴ Paragraph 8.44 of the TCRS.

**Greater Norwich: Employment, Town Centre & Retail Study
(Strategic Advice)⁴⁵**

- 5.32 The Employment, Town Centre & Retail Study (**ETCRS**) prepared by GVA was published in December 2017.
- 5.33 It draws on the findings of the TCRS (inter alia) to provide *the strategic conclusions and recommendations*⁴⁶ so that decision makers have *the information necessary to both direct and react to development and growth proposals that should help maximise Greater Norwich's potential*⁴⁷.
- 5.34 Of particular relevance to my evidence:
- i. *The comparison goods retail function of Norwich city centre should be protected and enhanced* (paragraph 3.20), where the majority of the comparison goods floorspace requirement identified by the TCRS should be accommodated if possible (paragraph 3.21);
 - ii. Underlining its strong and varied offer beyond retail, the TCRS *has not identified any major qualitative gaps in the leisure/cultural offer of the city centre* (paragraph 3.28);
 - iii. The redevelopment of Anglia Square *should continue to incorporate retail floorspace at ground floor level, in order to ensure that local residents' day to day shopping needs can be met. This should include units of a mixture of floorplate sizes, including larger units to enable current national retailers...to continue to have a trading presence in the centre, alongside smaller units for more specialist operators* (paragraph 3.37 with my emphasis added);
 - iv. Although the TCRS identifies no quantitative need for additional convenience goods floorspace, *there is an opportunity for qualitative improvements to the convenience goods retail offer in Anglia Square/Magdalen Street district centre, owing to the current limited facilities for local residents, with the exception of a small Iceland store* (paragraph 3.38 with my emphasis added); and
 - v. *Provision of a cinema should be retained if possible* (paragraph 3.39).

⁴⁵ CD2.9

⁴⁶ Paragraph 1.1 of the ETCRS.

⁴⁷ Paragraph 1.5 of the ETCRS.

- 5.35 In respect of offices, insofar as relevant to my evidence, the ETCRS suggests that locations that *are easily accessible from the inner ring road may provide opportunities for [new office space], including (in the longer term) a redeveloped Anglia Square/Magdalen Street*⁴⁸. It identifies:

...significant demand for good quality multi-let serviced or flexible offices, which could be accommodated within mixed use buildings, that provide other commercial uses on the ground floor. These types of spaces will be particularly beneficial in supporting the growth of the tech, media and creative sectors.

- 5.36 It adds that such sectors tend to cluster in locations that have a distinct, 'edgy' character⁴⁹.

⁴⁸ Paragraph 3.9 of the ETCRS.

⁴⁹ Paragraph 3.12 of the ETCRS.

6. NORWICH CITY CENTRE AND IMPACT MATTERS

- 6.1 In this section of my evidence, I consider Norwich City Centre and the likely impact of the application proposals upon it.
- 6.2 Before dealing with impact matters, it is useful to set out how I consider the impact test (paragraph 89 of the Framework) should be applied.

The impact test

- 6.3 It is important to note that no impact assessment was carried out in support of the application, given the application site (as part of Anglia Square/Magdalen Street Large District Centre) is a 'town centre' in Framework terms. Paragraph 89 of the Framework makes it clear that such assessments only apply to:

...applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan [and] if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace).

- 6.4 I note the impact test set out in the Framework is not whether there will be an 'adverse' impact on existing centre(s), as by implication any retail and/or leisure development could have such an impact, but whether the likely impact is so substantial as to be classified as 'significant adverse'. None of the objections made to the application have claimed a significant adverse impact on Norwich City Centre or any other existing centre.
- 6.5 As set out in the 'Town centres and retail' section of the Planning Practice Guidance (**PPG**)⁵⁰, the impact test should be undertaken in a proportionate and locally appropriate way. In this respect, my evidence does not assess in quantitative terms the impact of the proposed development. I do, however, consider the qualitative factors determining its likely impact on Norwich City Centre.
- 6.6 Whilst I deal with matters of hierarchy later in this section, I note that it forms no part of the proper application of the impact test.

⁵⁰ Paragraph: 017 Reference ID: 2b-017-20190722 [CD1.2].

- 6.7 Against this background I set out below my assessment of the scale and function of Norwich City Centre and its vitality and viability, and go on to examine the likely impact of the application proposals upon it.

Norwich City Centre impact

The scale and function of Norwich City Centre

- 6.8 Norwich is an attractive historic city and the largest of the major East Anglian centres. It is categorised as a 'Regional Centre' on the basis of the volume and quality of its retail offer, with PMA ranking the City Centre 9th out of 200 UK centres on this measure⁵¹.
- 6.9 Paragraph 6.73 supporting JCS Policy 19⁵² indicates that Norwich City Centre has *approximately 1,100 shops covering 229,000m² of floorspace... (of which most are retail comparison goods) while the area also provides for most of the JCS area's commercial and leisure provision.*
- 6.10 I note this floorspace figure (229,000 sqm) is slightly greater than the 207,000 sqm reported by PMA as at 2018⁵³.
- 6.11 The Council's most recent Shopping Floorspace Monitor Report, of June 2018, contains information on A1 retail floorspace in the City Centre's primary and secondary retail areas. This is shown in Table 2 below.

Table 2 – Total A1 retail floorspace, Norwich City Centre

	A1 retail floorspace (sqm net)	Vacant A1 retail floorspace (sqm net)	Under construction / refurbishment (sqm net)
Primary area	155,555	8,265	8,092
Secondary area	21,772	3,741	110
TOTALS	177,327	12,006	8,202

Source: Shopping Floorspace Monitor Report, June 2018 [CD2.25].

Notes: 'Vacant' and 'Under construction / refurbishment' floorspace part of total 'A1 retail floorspace' (i.e. not additional).

⁵¹ PMA PROMIS Retail Report for Norwich, October 2019 [CD2.22].

⁵² CD2.2

⁵³ PMA PROMIS Retail Report for Norwich, October 2019 [CD2.22].

- 6.12 The Shopping Floorspace Monitor Report⁵⁴ does not contain information on non-A1 retail floorspace, nor does it provide a breakdown of the A1 retail floorspace identified in Table 2. However, the TCRS estimates that Norwich City Centre has 166,825 sqm net of A1 comparison goods floorspace⁵⁵.
- 6.13 Highlighting its particularly strong comparison goods offer, PMA comments that:
- i. The city has a strong line-up of department and variety stores, including John Lewis, Debenhams, House of Fraser, Marks & Spencer, Primark and Jarrolds (an independent department store);
 - ii. Norwich has an above average representation of fashion retailers, especially within the middle-range spectrum e.g. River Island, H&M, Zara, Topshop, Next; and
 - iii. Although slightly more limited than Regional Centres in general, the city is well represented by upper-middle fashion retailers e.g. Joules, Jack Wills, Jigsaw, Hollister, White Stuff.
- 6.14 The 2016 household survey of shopping patterns⁵⁶, commissioned by the Council for the purpose of the TCRS, indicates that Norwich City Centre:
- ...accounts for almost £1 in every £2 spent on comparison goods in the survey area [£1,264m or 45.9% of total comparison goods expenditure available]. This demonstrates both the strength of its comparison goods offer and the influence it has over shopping patterns across the area as the sole highest-order centre⁵⁷.*
- 6.15 The plan at Appendix CW2 shows the significant extent of this survey area and Norwich City Centre's pattern of comparison goods market share within it. This demonstrates that the City Centre is *fulfilling its role and function as a regional shopping destination⁵⁸*.
- 6.16 Further highlighting the City Centre's relatively dominant performance in this respect, Anglia Square/Magdalen Street Large District Centre has a

⁵⁴ CD2.25

⁵⁵ TCRS (Volume 3: Quantitative Retail Need Tables): Appendix I, Table 6b [CD2.9(c)].

⁵⁶ CD2.9(d)

⁵⁷ Paragraph 7.21 of the TCRS [CD2.9(a)].

⁵⁸ Paragraph 7.22 of the TCRS [CD2.9(a)].

survey-derived comparison goods turnover of zero. This is clearly unrealistic but reflects that the Large District Centre's limited retail offer does not feature notably in the results of the household survey⁵⁹.

- 6.17 Significantly, however, Norwich City Centre offers more than just retail and comparison goods shopping.
- 6.18 The TCRS identifies 70 restaurants, 54 cafes and 33 bars in Norwich City Centre⁶⁰. PMA reports that the city has seen an increase in the number of 'branded' food and beverage operators, ranking above average for Regional Centres on this measure. Norwich Lanes, in particular, has a strong mixture of good quality, independent food and beverage operators⁶¹.
- 6.19 Reflecting its region-wide catchment, the TCRS further observes that the City Centre has a wide variety of commercial leisure attractions⁶² including cinemas, a bowling alley, health and fitness facilities, live music venues and nightclubs. There are two cinemas, namely The Vue's 8-screen multiplex at Castle Mall and Cinema City (independent cinema and arts venue) on St Andrew's Street⁶³.
- 6.20 Described on the Council's website as a 'City of Culture' it also *includes many galleries, theatres, venues, a puppet theatre, festivals, amazing built heritage including two cathedrals and a grand Norman Castle, beautiful parks and open spaces*⁶⁴. Appendix CW3 provides a non-exhaustive list of arts and cultural amenities in Norwich City Centre. I further note that Norwich is England's first UNESCO City of Literature (one of only 20 in the world) and was a finalist in the UK City of Culture 2013 competition.
- 6.21 Based on the foregoing it is very clear, in my view, that Norwich City Centre has a significant quantum and variety of retail and leisure/cultural

⁵⁹ TCRS (Volume 3: Quantitative Retail Need Tables): Appendix I, Table 6a [CD2.9(c)].

⁶⁰ Paragraph 4.11 of the TCRS [CD2.9(a)].

⁶¹ Paragraph 4.20 of the TCRS [CD2.9(a)].

⁶² Paragraph 9.4 of the TCRS [CD2.9(a)].

⁶³ In addition, Riverside Large District Centre has a 14-screen Odeon IMAX cinema.

⁶⁴

https://www.norwich.gov.uk/info/20007/events_tourism_and_culture/1204/arts_and_culture

attractions. It functions as a regional and multi-purpose 'destination', while the application proposals will have a different and complementary function.

Norwich City Centre vitality and viability

- 6.22 In order to form a judgement about the extent and significance of the proposed development's likely impact on Norwich City Centre, it is important to establish the health, or 'vitality' and 'viability', of the City Centre.
- 6.23 As the PPG⁶⁵ sets out, a judgement of impact is necessary in the light of local circumstances.
- 6.24 I set out below that Norwich City Centre is vital and viable in the terms of the Framework and having regard to the 'healthcheck' indicators set out in the PPG⁶⁶. This judgement is supported by the TCRS, and is not contested by the owners of INTU Chapelfield and Castle Mall in their objections made to the application.
- 6.25 Paragraphs 4.4-4.49 of the TCRS⁶⁷ present a detailed healthcheck for Norwich City Centre, which I find to be accurate and robust. The first bullet after paragraph 4.49 states that it *continues to benefit from strong levels of vitality and viability and is fulfilling a role reflective of its role and function as the highest order centre serving the sub-region*. This is evidenced by:
- i. *There is a healthy diversity of uses which contributes positively to its vitality and viability* (paragraph 4.14);
 - ii. Good representation by national retailers (paragraphs 4.15-4.19) and independent operators (paragraphs 4.20-4.22);
 - iii. Particularly strong comparison goods offer and *a key centre which most comparison goods retailers are likely to seek representation in, on account of its extensive catchment area* (paragraph 4.7);
 - iv. A low vacancy rate (first bullet after paragraph 4.49), particularly in the prime retail area of Chapelfield / Castle (paragraph 4.29);
 - v. Good pedestrian footfall (paragraph 4.35);

⁶⁵ Paragraph: 018 Reference ID: 2b-018-20190722 [CD1.2].

⁶⁶ Paragraph: 006 Reference ID: 2b-006-20190722 [CD1.2].

⁶⁷ CD2.9(a)

- vi. An attractive environment for shoppers and other visitors (paragraph 4.42), with most of the city centre benefitting from a *particularly positive architectural quality* (seventh bullet after paragraph 4.49); and
- vii. The city centre benefits from a number of 'character areas' that help *define its multiple roles and functions* (second bullet after paragraph 4.49).

6.26 These findings indicate positive conditions for investment in the City Centre. For example:

- The recent investment by Primark to extend and refurbish its store on Haymarket demonstrates *the strong performance of the city centre as a comparison goods shopping destination*⁶⁸;
- The owners of Castle Mall, InfraRed, have *invested heavily in the Mall, both in terms of physical improvements and also in re-profiling the Mall's offer, and, consequently, attracting a new range of tenants*⁶⁹;
- PMA notes that planning permission has been granted for a change of use from retail to leisure at Castle Mall, with the opening of the Superbowl UK ten-pin bowling alley in September 2019 and plans for a gym, a soft play centre and an obstacle assault course.

6.27 To me this endorses the findings and conclusions of the healthcheck analysis set out above; Norwich City Centre is healthy, stable and a commercially attractive location for investment.

Qualitative impact assessment

6.28 I now assess in qualitative terms the impact of the proposed 'town centre' development on Norwich City Centre, in the light of above analysis and considering the scale and nature of retail and leisure uses proposed.

Retail

6.29 The application proposals comprise up to 11,000 sqm GEA of ground floor flexible commercial floorspace. However, not all of this floorspace will be occupied by A1 retail (as set out in paragraph 4.22 above).

⁶⁸ Fourth bullet after paragraph 4.49 of the TCRS [CD2.9(a)].

⁶⁹ GL Hearn letter on behalf of the owners of Castle Mall [CD21.1].

6.30 As described in the retail strategy⁷⁰, the retail offer will comprise a range of uses including:

- Foodstore;
- Services & Convenience Retail;
- Comparison Retail; and
- Lifestyle Retail.

6.31 In respect of the foodstore, a medium-sized town centre format is proposed (at least 800 sqm GIA⁷¹) for *a weekly or more regular shop*⁷². Whilst no maximum size is imposed, a large format is not realistic with the changes in the grocery sector, which have seen a shift towards smaller convenience-based formats⁷³.

6.32 As such, I consider the foodstore proposed is not of a scale, or in a location, that would compete with convenience goods floorspace in Norwich City Centre to the extent that any material adverse impact is likely to occur. This judgement takes into account that food shopping trips are typically localised in nature, as evidenced by the results of the TCRS household survey.

6.33 I reach a similar conclusion regarding services and convenience retail. Such uses will be small scale and *support the local community and the residents of the new build flats* at Anglia Square⁷⁴. They will not, in my view, directly compete with the City Centre.

6.34 Turning to comparison retail, the retail strategy proposes *a range of goods compatible with the Large District Centre function of the scheme*

⁷⁰ CD7.7

⁷¹ In accordance with Condition 11 agreed between the Council and the Applicant (as attached to the Council's Statement of Case).

⁷² CD7.7, page 5.

⁷³ Planning permission (refs. 11/00160/F and 11/00161/F) was granted in March 2013 for the comprehensive redevelopment of Anglia Square including a new 7,792 sqm foodstore. As set out in the Council's committee report for the current application, *there has been evidence for some time that food store developments of the previously planned scale are no longer being pursued by supermarket operators* (paragraph 227) [CD9.1].

⁷⁴ CD7.7, page 6.

and – in respect of lifestyle retail – *a destination for quality home furnishings [as such an offer] is not currently available in Norwich*⁷⁵.

- 6.35 The potential scale of comparison goods floorspace is modest (7,435 sqm) relative to Norwich City Centre (166,825 sqm). Comparison retail is the main driver of activity within the City Centre, drawing trade from a regional catchment, while the proposed development will serve a different market with a much more localised catchment. This can be evidenced by those comparison goods retailers currently based at Anglia Square and in the central area of Norwich City Centre⁷⁶. There is clearly scope for dual (or multiple) representation in the City and accordingly, the retail strategy states that:

*Target tenants may have an existing presence in the City Centre which would almost certainly be retained, representing a more local offer at Anglia Square that in no way dilutes what is already available elsewhere in the City*⁷⁷.

- 6.36 I therefore conclude that the comparison retail (including lifestyle retail) proposed would not directly compete with Norwich City Centre, and that any trading impacts likely to occur would not amount to 'significant adverse' in the terms of the Framework.

A3/A4 Leisure

- 6.37 As set out in the retail strategy, the A3/A4 offer would complement the *cinema to provide a series of cafes, restaurants and bars...open during the day and into the evening to encourage use of the centre all day*⁷⁸. It would primarily serve on-site and nearby residents and workers, and other visitors to the shopping centre and/or cinema.
- 6.38 The illustrative plan at Appendix CW1 shows nine A3/A4 units focused around the new 'Leisure' square. The number of units could vary, provided the quantum of such floorspace does not fall below 1,500 sqm

⁷⁵ CD7.7, page 6.

⁷⁶ Including Boots, Poundland, Savers and Shoe Zone.

⁷⁷ CD7.7, page 6.

⁷⁸ CD7.7, page 5.

GIA or exceed 3,500 sqm GIA across the site⁷⁹. Notwithstanding, the amount of A3/A4 uses will be strictly limited.

- 6.39 By comparison, Norwich City Centre has 157 A3/A4 uses⁸⁰ and (for a Regional Centre) an above average number of 'branded' food and beverage operators. It also has a strong independent offering, particularly within the Norwich Lanes area.
- 6.40 A mix of independent and national operators will create a distinct A3/A4 offer at Anglia Square, catering for a different market (similar to comparison retail) in a new quarter of the city. Thus, I consider the proposals would have no significant adverse impact on food and beverage provision in the City Centre.

D2 Leisure

- 6.41 The new cinema will replace the previously long-established Hollywood Cinema (which fell into administration and closed in February 2019). It will have multiple screens but there is currently no named operator.
- 6.42 As set out above, Norwich City Centre includes two cinemas – The Vue's 8-screen multiplex at Castle Mall and Cinema City (independent cinema and arts venue) on St Andrew's Street – and Riverside Large District Centre has a 14-screen Odeon IMAX cinema. The latter is performing particularly well, *attracting over 50% of the cinema market share from the survey area*⁸¹, while The Vue and Cinema City attract a market share of 19.9% and 9.2% respectively⁸².
- 6.43 These are strong market shares, in my opinion, and each of the cinemas benefit from complementary food and beverage uses (and wider attractions) nearby. Given current market shares and the recent closure of a cinema at the application site, I consider there is adequate 'headroom' in the city for the proposed new cinema.

⁷⁹ In accordance with Condition 17 agreed between the Council and the Applicant (as attached to the Council's Statement of Case).

⁸⁰ Comprising 70 restaurants, 54 cafes and 33 bars.

⁸¹ Paragraph 5.6 of the TCRS [CD2.9(a)].

⁸² Paragraph 9.7 of the TCRS [CD2.9(a)].

- 6.44 I note that none of the cinema operators have made objections to the application proposals⁸³, which confirms my view that no significant adverse impact is likely to occur.

The hierarchy of centres

- 6.45 'Scale' is not a policy test in the Framework for decision-making. Notwithstanding this very clear position, I accept that scale is relevant to the considerations relating to impact and hierarchy.
- 6.46 I therefore set out below that the regional role of Norwich City Centre, and its dominant position at the apex of Greater Norwich's hierarchy of centres, will not be challenged by the application proposals. My evidence in this respect takes into account my earlier analysis.

Relative centre scale

- 6.47 Table 3 below presents a comparative analysis of town centre floorspace within each of the centres.

Table 3 – Comparative town centre floorspace

	Norwich City Centre (sqm)	Anglia Square (as proposed) (sqm)	Plus wider Large District Centre (as existing) (sqm)
Total floorspace	207,000	25,750	16,590
A1 retail	177,327	8,275	9,530
A1 comparison goods	166,825	7,435	7,520

Source: Floorspace figures for Norwich City Centre and Anglia Square taken from my evidence. Floorspace figures for the wider Large District Centre (i.e. excluding Anglia Square) derived from Experian Goad, April 2019.

- 6.48 This demonstrates that the Large District Centre is subservient to Norwich City Centre; a 'Top 10' UK centre on the basis of the volume and quality of its retail offer⁸⁴. Even with the application proposals, which will result in a net reduction of town centre floorspace at Anglia Square including A1 retail, this will clearly remain the case.

⁸³ GL Hearn, on behalf of the owners of Castle Mall, raised *specific concerns regarding the provision of additional leisure floorspace at Anglia Square [involving] almost double the amount of cinema floorspace* [CD21.1].

⁸⁴ PMA PROMIS Retail Report for Norwich, October 2019 [CD2.22].

Relative centre turnover

- 6.49 The TCRS estimates that Norwich City Centre is achieving a comparison goods turnover of some £1,264m or, in other words, 45.9% of total comparison goods expenditure available within its regional catchment. The same study indicates that Anglia Square/Magdalen Street Large District Centre has a comparison goods turnover of zero (based on the results of the household survey).
- 6.50 Clearly this assertion in respect of the Large District Centre is unrealistic but it serves to highlight the centre's limited offer and, thus, catchment. The application proposals seek to deliver an enhanced Anglia Square shopping centre in line with policy aspirations. Whilst it is impossible to accurately predict the likely turnover of the proposed development (not least because the precise mix of uses and the retailer line-up is currently unknown), I would estimate a comparison goods turnover in the region of £25m⁸⁵ (i.e. less than 2% of the City Centre's turnover).
- 6.51 By this measure, Anglia Square will remain subservient to Norwich City Centre, which will remain by a significant margin the best performing centre in the city and, indeed, the sub-region.

Relative centre facilities

- 6.52 It is also important to note that Norwich City Centre is much more than just a regional shopping destination. It is considered the capital of East Anglia and therefore contains a large amount of office accommodation (including the Council's offices at City Hall) and a range of leisure/cultural facilities such as theatres, museums and entertainment venues as indicated at Appendix CW3.
- 6.53 Anglia Square/Magdalen Street Large District Centre currently has few facilities of this nature. Whilst a new cinema is proposed, it is (notwithstanding the recent closure of Hollywood Cinema) a replacement cinema, which is supported by the PGN as well as the ETCRS informing the new GNLP.

⁸⁵ Assumes 6,000 sqm GEA of the 7,435 sqm GEA of potential A1 comparison goods floorspace will be occupied as such; a net to gross ratio of 85% (therefore 5,100 sqm net); and a sales density of £5,000 per sqm net. I consider the average sales density of £8,000 per sqm net used for the TCRS [CD2.9(c)] to be highly unrealistic.

- 6.54 In my view, it is the City Centre's full range of retail, leisure/cultural and office facilities that contribute to the overall attraction of the centre, which will ensure it remains at the apex of the hierarchy despite the enhanced offer at Anglia Square.

Conclusion on impact / hierarchy matters

- 6.55 I have demonstrated that Norwich City Centre is a regional destination with a significant quantum and variety of retail and leisure/cultural attractions, which are important aspects of the City Centre's overall vitality and viability.
- 6.56 As I set out in my qualitative impact assessment, the retail and leisure components of the scheme will not have a significant adverse impact on the vitality and viability of Norwich City Centre.
- 6.57 I have also demonstrated that the proposed development will not alter the City Centre's role in the hierarchy of centres.
- 6.58 All of this should be considered in the context that the application proposals will enhance and have a positive impact on the Large District Centre; a position that is supported by the Government's policy for town centres.

7. SUMMARY AND CONCLUSIONS

- 7.1 My evidence sets out that the proposed development is consistent with the Government policies for ensuring the vitality of town centres (Chapter 7 of the Framework); and is consistent with the development plan for the area in regard to town centre and retail impact matters.
- 7.2 It has demonstrated that:
- 7.3 **First**, the application site is a 'town centre' in Framework terms, and it is Government policy to ensure the vitality of town centres.
- 7.4 **Second**, Anglia Square is a principal but declining part of the Large District Centre. The retail offer, which is focused towards discount/value retailing, lacks diversity and the site has virtually no leisure facilities. It does not currently fulfil its role as the focus of the Large District Centre.
- 7.5 **Third**, there is long-standing policy support for a major mixed use redevelopment of Anglia Square including the enhancement of its retail and leisure offer.
- 7.6 **Fourth**, the set of planning conditions agreed between the Council and the Applicant will ensure the scheme comprises less floorspace dedicated to main town centre uses, and A1 retail, than currently accommodated at the site. Notwithstanding, the complementary mix of retail and non-retail uses will enhance the function of the Large District Centre.
- 7.7 **Fifth**, Norwich City Centre has a significant quantum and variety of retail and leisure/cultural attractions. It functions as a regional and multi-purpose 'destination', while the application proposals will have a different and complementary function. To that end:
- 7.8 **Sixth**, the retail and leisure components of the scheme will not result in a significant adverse impact on the City Centre's overall vitality and viability.
- 7.9 **Seventh**, the proposed development will not challenge the regional role of Norwich City Centre or alter its dominant position at the apex of Greater Norwich's hierarchy of centres.