

NORWICH CITY COUNCIL

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

16th SEPTEMBER 2022



1. Context

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

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

2. Study requirements

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

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

3. Study methodology

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

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

RESEARCH TO SUPPORT ARTICLE 4 DIRECTION IN NORWICH CITY

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

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

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

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

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

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

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

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

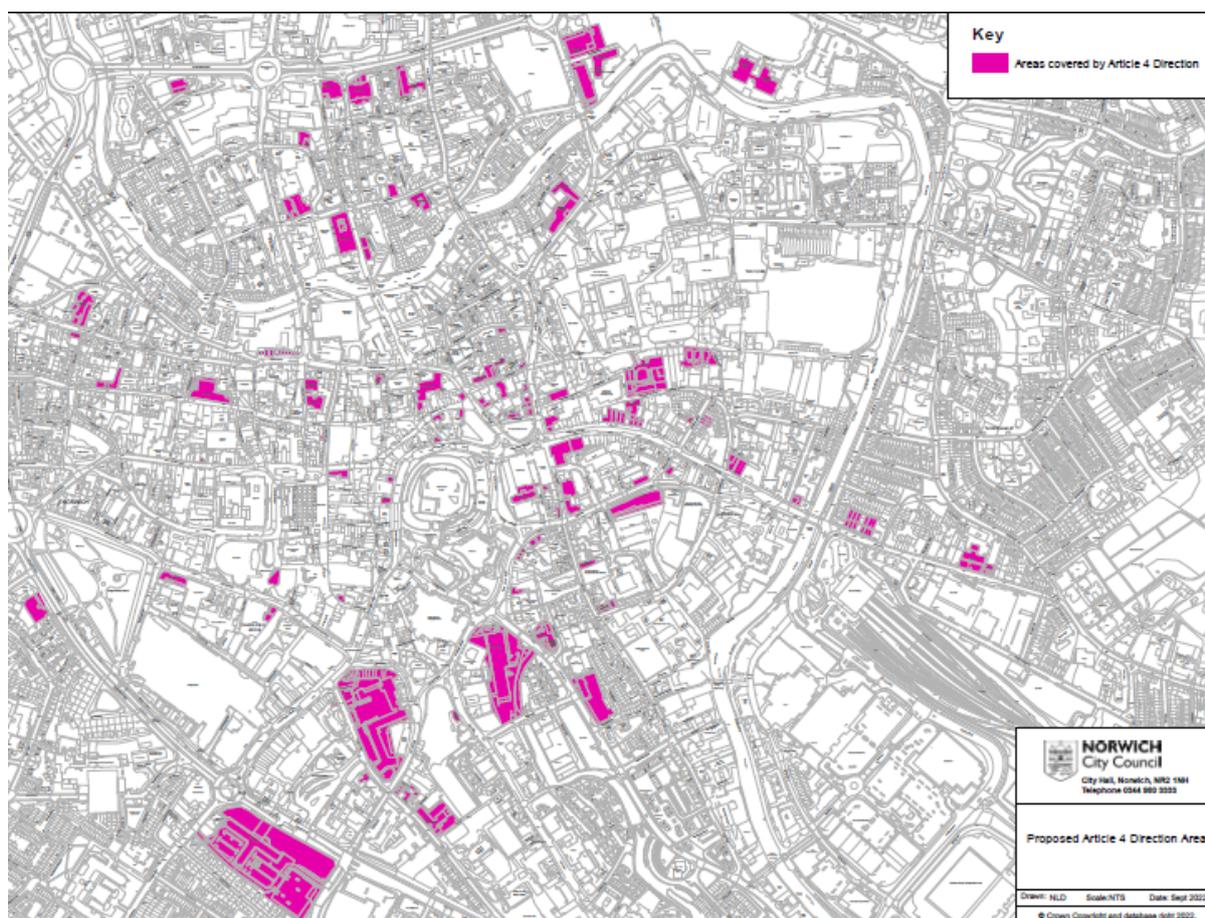
applied where there was a case for their release, and amber was used when there was uncertainty.

Following the fieldwork, all of the ‘Ambers’ were then discussed with the Council. Combining local knowledge and policy background, the Ambers were then allocated either Red or Green status, depending on the outcome of the discussion. Black was used when survey work identified that the building was no longer in commercial office use.

4. Summary findings

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

Figure One Map showing buildings proposed for Article 4 Direction protection



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

- The office stock in Norwich city centre is scattered rather than concentrated. There is no ‘central business district’, nor are there identifiable concentrations, where office use is dominant.

- The scattered nature of the office stock increases the vulnerability of the individual parcels. Without policy protection, these could be gradually denuded until the point where the whole office market is further weakened.
- The strongest areas in terms of office use include the following.
 - Bank Plain/St Andrew's Street
 - Charing Cross
 - North of River Wensum
 - Prince of Wales Road/Cattlemarket Street
 - Surrey Street/St Stephens Street
 - Thorpe Road
 - Whitefriars
- The stock of office premises is enormously variable, ranging from small, period offices above retail premises to large, modern corporate office buildings.
- The range of types and sizes of office space in Norwich is essential for meeting a diverse demand profile, including the need for affordable offices.
- A significant proportion of Norwich's offices are in 19th century and earlier buildings, often town houses. These work exceptionally well for small, professional firms, providing sub-divisibility, natural light and air, and a central location.
- A number of self-contained, office buildings – particularly those dating from the 1960s-1980s – have already been converted to residential use and those remaining are particularly vulnerable due to the relative ease with which they can be converted.
- The premises surveyed were, on the whole, well occupied, with little evidence of vacancy. There was minimal indication of neglect or obsolescence.

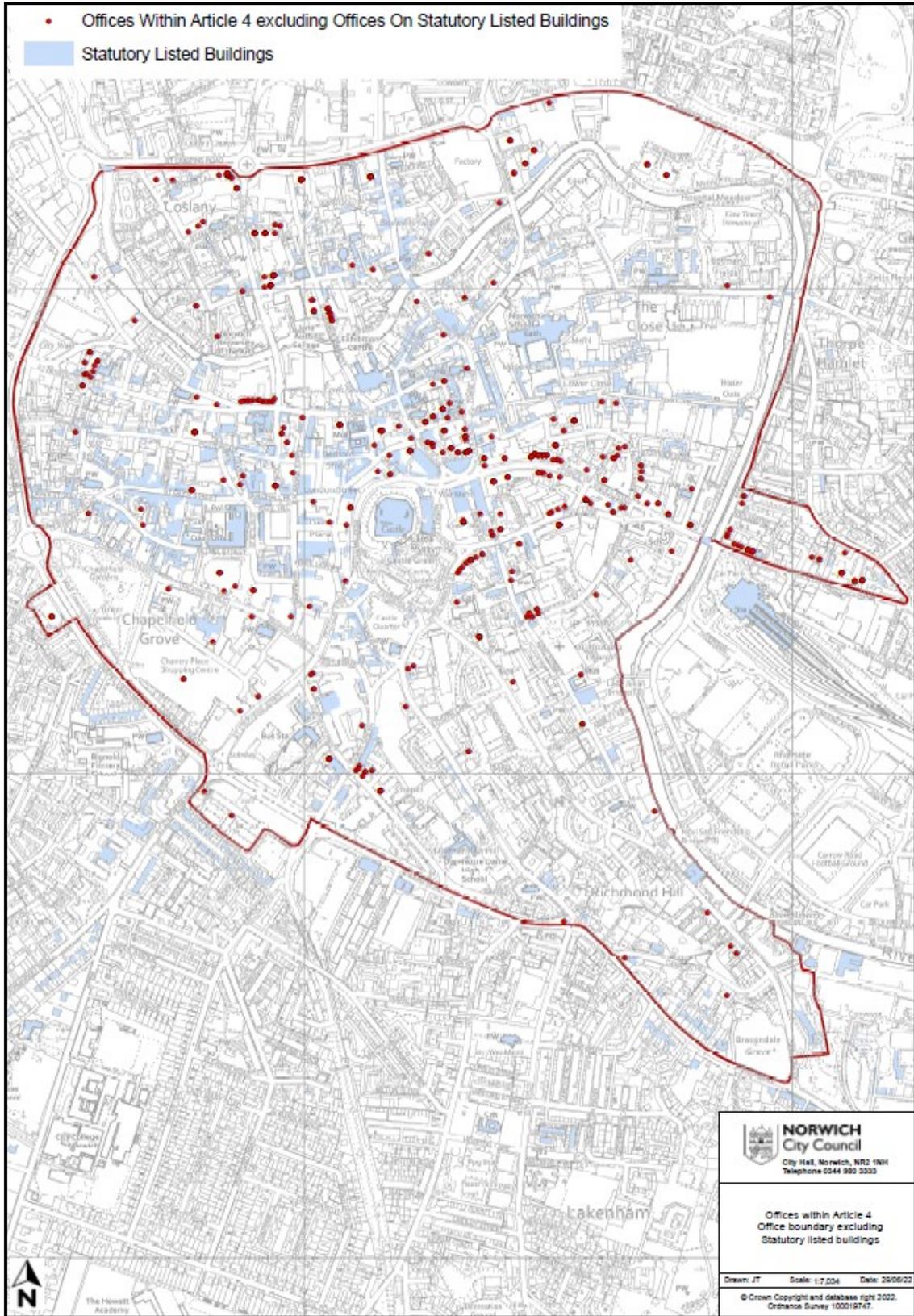
5. Concluding remarks

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

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

Appendix One

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



Appendix Two Extract from data sheet

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

Appendix Two Extract from data sheet (cont'd)

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