

## Retail Statement

**LPA:** Norwich City Council

**Our ref No:** 220504A

**Date of statement:** June 2022

**Site:** Carrow Works, Kings Street, Norwich

**Proposal:** Hybrid application to develop Carrow Works for a phased residential-led development (use class C3) with supporting mixed-uses (non-residential Class E/F1 use class), demolition of buildings, the retention, conversion and adaptation of Listed and locally listed Buildings and structures, landscaping, open space, new and modified access, car parking and other ancillary works. Detailed application component comprises the construction of the primary internal road and associated public spaces and public realm, restoration and change of use of Carrow Abbey back to original residential use (Class C3), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works.

**Client:** Fuel Properties Ltd



## Contents

1. Introduction .....	3
2. The Site and Context .....	4
3. The Proposal .....	6
4. Planning Policy Considerations and Methodology .....	8
Sequential Test Assessment .....	8
Impact Assessment .....	16
5. Sequential Test Assessment .....	22
Estate Agencies .....	22
Norwich Brownfield Register .....	23
Findings .....	24
6. Impact Assessment .....	26
Assessment of existing centres .....	26
Retail and Leisure commitments .....	35
Retail and Leisure Quantitative Forecast .....	36
Proposed development .....	39
Impact on vitality and viability of centres .....	43
7. Conclusion .....	48
8. Appendices .....	50

## 1. Introduction

- 1.1. This Retail Statement has been prepared by MAPanning Consultancy on behalf of the applicant, Fuel Properties Ltd, for a hybrid application for a residential-led development, supporting non-residential mixed-uses (incl. Class E/F1) at Carrow Works, Kings Street, Norwich. Please see the planning application site location at Figure 1 below.
- 1.2. This document comprises a Main Town Centre Use Retail Sequential Test Assessment ('Sequential Test') and a Retail and Leisure Impact Assessment ('Impact Assessment'). It provides an assessment of potential sequentially preferable sites and an analysis of the proposal's retail impact on the relevant defined centres within the 'assessment area'. The methodology used observes the local and national planning policy requirements.
- 1.3. This document should be read in conjunction with all documents and drawings submitted alongside the planning application.



Figure 1: The location of the site within the wider context.

## 2. The Site and Context

- 2.1. The application site ('the site') is a 16.91 hectares parcel of land comprising the former Carrow Works site previously home to the renowned Colman's mustard manufacturing plant; currently, the site being largely vacant after the industrial and production operations were relocated in England and Germany.
- 2.2. The site's boundaries are largely defined by the Wensum River to the north, a railway line to the east, Bracondale/A147 to the south (including the County Hall roundabout), and a number of buildings and a car park located between the site's western boundary and A147/King Street.
- 2.3. Currently, the site comprises a number of industrial buildings of various forms, scales, massing, appearance and layout which are mostly located along the river and the site's eastern boundary. Additionally, roughly in the centre of the site, there are a number of historically significant buildings, including remnants of the former Carrow Priory, a Scheduled monument.
- 2.4. There are other features and structures within the site, including a number of trees and car parking. Access is currently achieved via a gate house off County Hall roundabout. Additionally, there is pedestrian, cycle and emergency access to the north western corner of the site and pedestrian access to the north east of the site via an underpass below the railway line.

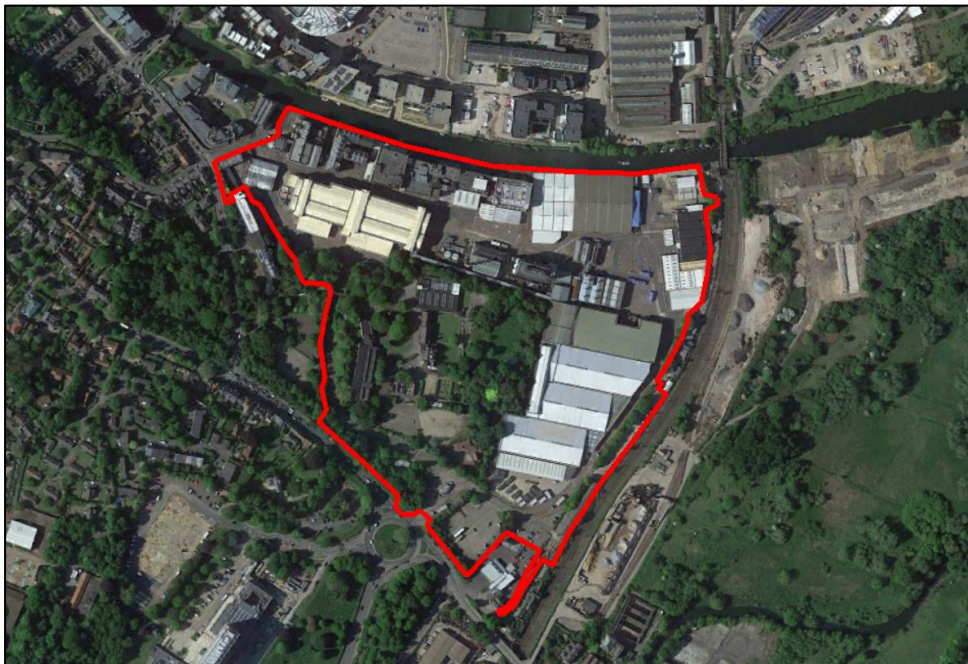


Figure 2: Aerial image of the site.

- 2.5. The site is located within the urban area of Norwich, approx. 1km to the south east of the city centre. Industrial units and modern blocks of flats describe the northern bank of River Wensum, with Carrow Road Stadium and Riverside Retail Park located further to the north west. To the west there are mostly residential properties while to the south there are industrial uses and the Norfolk County Hall, with residential properties further beyond.
- 2.6. The wider area to the east and south east is defined by rural features such as River Yare and functional flood plains, Trowse Woods and Whitlingham Country Park, the village of Trowse Newton, A146 and the A47 bypass, as well as open agricultural fields.



### 3. The Proposal

3.1. The description of the proposed development is as follows:

*‘Hybrid application to develop Carrow Works for a phased residential-led development (use class C3) with supporting mixed-uses (non-residential Class E/F1 use class), demolition of buildings, the retention, conversion and adaptation of Listed and locally listed Buildings and structures, landscaping, open space, new and modified access, car parking and other ancillary works. Detailed application component comprises the construction of the primary internal road and associated public spaces and public realm, restoration and change of use of Carrow Abbey back to original residential use (Class C3), enhanced access to Carrow Abbey and Scheduled Ancient Monument and associated ancillary works.’*

3.2. The current proposed plans identify 11 no. key development areas as shown in Figure 3 below:



Figure 3: Proposed indicative masterplan.

3.3. Among other things, the proposed development comprises:

- 1,855 dwellinghouses;
- 3,003 sqm of industrial floorspace; and
- 23,627 sqm of commercial floorspace, mainly Use Class E units.

- 3.4. Of the **23,627 sqm of commercial floorspace** it is expected that approx. 11,271 sqm will comprise office floorspace, while **retail and leisure floorspace will consist of 12,356 sqm**, mostly be located at ground floors within the building in the following areas: 1, 2, 3, 10 and 11 (as highlighted in Figure 3 above). Most of the retail and leisure floorspace provision is to be located to the north of the site along the riverside with a foodstore located adjacent to the site entrance by the County Hall roundabout.

*Table 1: Proposed retail and leisure floorspace per each masterplan area.*

Area	Building No.	Retail or Leisure (sqm)	Proposed use
1	92	250.75	Leisure/Comparison retail
1	207	1314	Convenience Retail
1	206/5	305.5	Leisure
1	7/7A/8/8A	1,239	Leisure
1	209	723	Comparison Retail
1	1B	850	Comparison Retail
2	New	788	Convenience Store
2	New	1,001	Comparison Retail
2	New	1,044	Comparison Retail
3	N/A	664	Comparison Retail
10	N/A	2,203	Convenience Retail
11	N/A	1974	Leisure
<b>Total</b>		<b>12,356.25</b>	

## 4. Planning Policy Considerations and Methodology

- 4.1. This section sets out the planning policy background of the proposal in relation to the national and local planning policy guidance and outlines the methodology used in the sequential test and impact assessment exercises.
- 4.2. The following national and local planning guidance and policy documents are of key importance in considering the retail and leisure elements of the proposed development:
  - National Planning Policy Framework (2021) (NPPF)
  - National Planning Policy Guidance (NPPG)
  - Joint Core Strategy for Broadland, Norwich and South Norfolk (2014) (JCS)
  - Development Management Policies Local Plan (2014) (DMP)
  - Site Allocations and Site Specific Policies (2014)
  - Local Plan Policies Map (2016)
- 4.3. Additionally, Norwich City Council, together with Broadland and South Norfolk District Council are preparing the 'Greater Norwich Local Plan' (GNLP) which will replace the existing JCS. The GNLP has been submitted to the Secretary of State for independent examination on 30<sup>th</sup> July 2021 and is currently undergoing examination hearings.
- 4.4. As of February 2021, it is formally expected that the adoption of the GNLP to take place in Autumn 2022, albeit this could now be subject to delays following the recent challenges in relation to the new rules on 'nutrient neutrality' issued by Natural England. Nevertheless, it is considered that the GNLP is a significant material consideration in assessing the proposed development.

### Sequential Test Assessment

#### *Planning Policy Context*

- 4.5. The National Planning Policy Framework (NPPF) specifies that proposals for retail or town centre uses should be located in line with a sequential approach to safeguard the vitality and viability of existing town centres.
- 4.6. It is worth noting that following the changes to The Town and Country Planning (Use Classes) Order 1987 (as amended) which came into force on 1<sup>st</sup> September 2020, former most retail, leisure, offices as well as light industrial uses are now included under the overarching Use Class E.



- 4.7. Nevertheless, at Annex 2 (Glossary), the NPPF is quite clear in identifying retail, office and leisure uses as 'main town centre uses' while excluding light industrial from its definition<sup>1</sup>. Therefore, the use class changes do not have a material impact on the sequential approach relevant to the proposed development in respect of the aims of the NPPF.
- 4.8. The NPPF continues at Annex 2 (Glossary) by defining 'out of centre' locations as not in or at the edge of a defined centre. For retail purposes, an 'edge of centre' location is defined by the NPPF as the area within 300 m of a primary shopping area and for any other main town centre uses as within 300 m of a town centre boundary.
- 4.9. The site is located approx. 230 m outside the nearest defined town centre, Riverside Retail Park, which is identified as a Large District Centre. Additionally, the site is located approx. 900 m south east of the Norwich Primary Retail Area.
- 4.10. Paragraph 87 of the NPPF confirms that local planning authorities should apply a sequential approach to planning applications for main town centre uses that are not located within an existing centre or not in accordance with an up-to-date development plan. It states that main town centre uses should be located in 'town centres', then in 'edge of centre' locations. If suitable sites are not available, only then should 'out of centre' sites be considered.
- 4.11. Among other things, Policy DM 18 of the Norwich Local Plan states that proposals for main town centre uses outside defined centres (other than those forming part of a specific development allocation) will only be permitted where, among other things, are justified by a sequential test assessment.
- 4.12. The site is located outside a defined town centre, albeit in an 'edge of centre' location; consequently, the proposed development will need to satisfy the sequential approach outlined within the NPPF and the Local Plan.
- 4.13. NPPF Paragraph 88 provides clarification on the consideration of edge of centre and out of centres sites. It confirms that preference should be given to accessible sites that are well connected to the town centre; to enable such sites to be considered, both the applicant and the local planning authority must demonstrate flexibility on format and scale.

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<sup>1</sup> (Annex 2 of the NPPF) **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

### Application

- 4.14. Paragraph 005 of the NPPG states that in circumstances where main town centre uses cannot be accommodated within defined centres, Local Planning Authorities (LPAs) should *‘ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise’* (Reference ID: 2b-005-20190722). This exercise is undertaken by a sequential test and a retail impact assessment.
- 4.15. Paragraph 009 of the NPPG explains that a *‘sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking’* (Reference ID: 2b-009-20190722).
- 4.16. NPPG’s ‘Ensuring the vitality of town centres’ section (Paragraph: 011 Reference ID: 2b-011-0190722) confirms that it is for the applicant to demonstrate compliance with the sequential test and that, where possible, the local planning authority should support the applicant in undertaking the sequential test. The application of the test will need to be proportionate and appropriate for the given proposal.
- 4.17. Paragraph 011 continues that the following matters should be taken into account in determining whether a proposal complies with the sequential test:
- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered?
  - is there scope for flexibility in the format and/or scale of the proposal?
  - if there are no suitable sequentially preferable locations, the sequential test is passed.
- 4.18. Paragraph 011 also states that:
- “In line with paragraph 87 of the NPPF, only if suitable sites in town centre or edge of centre locations are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account.*

*Compliance with the sequential and impact tests does not guarantee that permission will be granted – all material considerations will need to be considered in reaching a decision.”*

- 4.19. NPPG’s paragraph 012 confirms that locational requirements are a material consideration within the sequential test assessment. However, robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.
- 4.20. Norwich’s local planning provisions echoes NPPF’s intention in protecting the role of town centres and requires a sequential test to be applied for application for main town centre uses (including retail) that are proposed outside or at the edge of an existing centre and are not in accordance with an up-to-date Local Plan.

#### *Area of Assessment*

- 4.21. Policy 19 of the JCS sets out the network and hierarchy of centres which will apply in greater Norwich, as follows:
- 1) Norwich Primary Retail Area
  - 2) Large District Centres of Anglia Square/Magdalen Street and Riverside;
  - 3) District Centres (Aylsham Road, Drayton Road, Bowthorpe, Dereham Road, Eaton Centre, Earlham House, Larkman centre and Plumstead Road. The new district centre proposed at Hall Road is also identified); and
  - 4) Local Centres.
- 4.22. Pre-application communication with the Council confirmed that an 800 m isochrone from the site would be reasonably acceptable in defining the extent of the assessment’s area (**see Appendix 1**).
- 4.23. As such it has been agreed that the following centres and their edges would need to be considered as part of the assessment:

No. on map	Centre	Hierarchy	Distance from site
1	The Site	Edge-of-centre	
2	Norwich City Centre	Primary Retail Area	880 m
3	Riverside Retail Park	Large District Centre	230 m
4	Hall Road Retail Park / Sandy Lane	District Centre	1.36 km
5	Hall Road/Trafalgar Street	Local Centre	440 m
6	Hall Road/Queens Road	Local Centre	590 m
7	Hall Road/Southwell Road	Local Centre	700 m

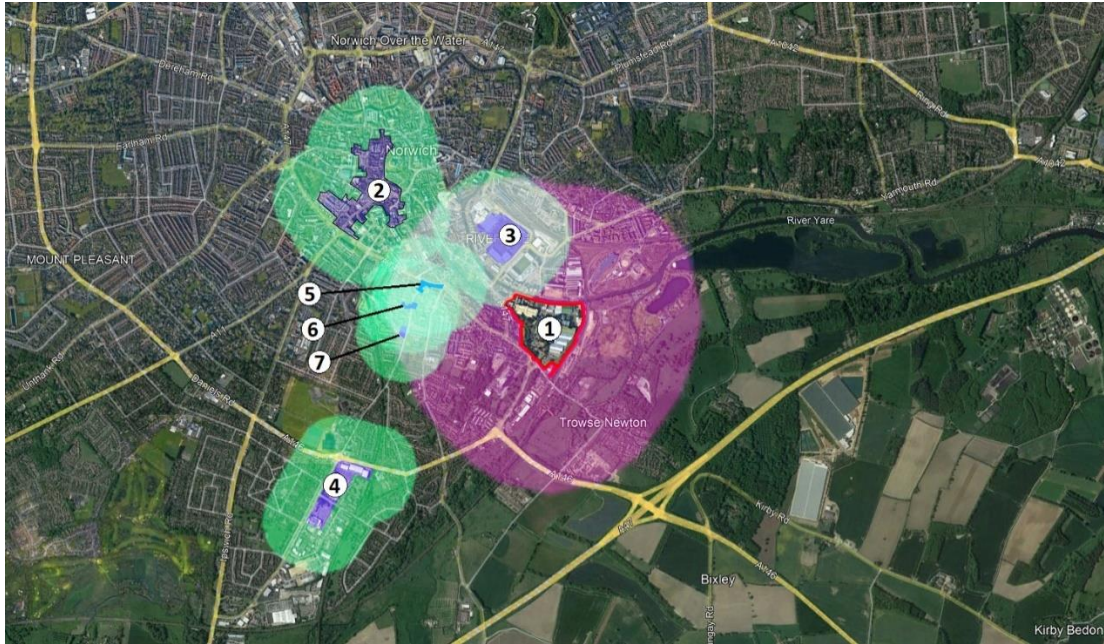


Figure 4: Satellite image showing the centres assessed and their 300 m edges (shown in colour mint) in relation to the site and its 800 m catchment area (shown in purple).

*Site Selection criteria*

- 4.24. The NPPG’s ‘Ensuring the vitality of town centres’ section confirms that the application of the test should be proportionate and appropriate for the given proposal.

*Planning and Case Law context*

- 4.25. The Secretary of State decision (ref APP/A1530/W/16/3147039 ) dated 4th August 2017 provides some clarity in relation to the level of flexibility that needs to be applied; there, the Inspector concluded that *‘the sequential test therefore means that whilst a sequentially preferable site need not be capable of accommodating exactly the same as what is proposed, it must be capable of accommodating development which is closely similar to what is proposed’*.
- 4.26. This is further reinforced by the Court Case Tesco (Appellant) v Dundee City Council (Respondent)<sup>2</sup> where the Court determined, among other things, that a sequential test *‘has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing’*.

<sup>2</sup> <https://www.supremecourt.uk/cases/docs/uksc-2011-0079-judgment.pdf>

- 4.27. The Court decision continues by referencing Lord Glennie's comments in *Lidl UK bH v Scottish Ministers [2006]*<sup>3</sup>, concluding that the main question remains '*whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site*'.
- 4.28. Indeed, in discussing whether the previous planning provisions contained within PPS4 in relation to the requirement for disaggregation of proposals, the Rushden Lakes Decision<sup>4</sup> states at paragraph 2.68 that '*had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF. It is too large a point to rest on implication. If it had been intended to carry on with the requirement then all that would have been required is the addition of the word "disaggregation" at the end of NPPF*' [para. 88].
- 4.29. Furthermore, the Scotch Corner appeal decision<sup>5</sup> concludes that the NPPF requires applicants to '*demonstrate flexibility on issues such as format and scale, it does not require the applicant to disaggregate the scheme*'.
- 4.30. A subsequent Call-In Inquiry decision<sup>6</sup> concluded that '*whereas past retail policy and guidance has adopted a disaggregation approach this is not embodied in either the Framework or the PG as was confirmed by the Court of Appeal in Warners Retail. The Secretary of State reached a similar conclusion in his decisions on Rushden Lakes, Scotch Corner and Honiton Road.*'
- 4.31. As such, considering the above-mentioned Case Law, it is considered that disaggregation is not a requirement as part of this sequential test assessment exercise.
- 4.32. Furthermore, the proposed retail provision subject to this application aims as mostly satisfying the needs of the future occupiers of the residential properties which form part of this mix use development but also as part of the committed and planned land which comprise the wider strategic allocation, East Norwich Masterplan.
- 4.33. Therefore, based on the Case Law and practicalities of the site, it is considered unreasonable to consider disaggregation of this element of the proposal as this is inter-dependent with other elements of the proposed development and its

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<sup>3</sup> [LIDL UK GmbH v The Scottish Ministers & Anor \[2006\] ScotCS CSOH\\_165 \(18 October 2006\) \(bailii.org\)](https://www.bailii.org/uk/ot/scot/cases/scot/cs/scotcs2006_165.html)

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/319505/Called-in\\_decision\\_-\\_Rushden\\_Lakes\\_Retail\\_Park\\_ref\\_2190175\\_11\\_June\\_2014.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/319505/Called-in_decision_-_Rushden_Lakes_Retail_Park_ref_2190175_11_June_2014.pdf)

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573706/16-12-01\\_DL\\_IR\\_Barracks\\_Bank\\_3132873.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573706/16-12-01_DL_IR_Barracks_Bank_3132873.pdf)

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/744575/18-10-01\\_DL\\_IR\\_The\\_Mall\\_Cribbs\\_Causeway.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744575/18-10-01_DL_IR_The_Mall_Cribbs_Causeway.pdf)



disaggregation could have a significant detrimental impact on the proposal's viability.

- 4.34. The local nature of the retail elements proposed are encouraged by the provisions within the strategic allocations (ref GNLP0360/3053/R10) of the emerging GNLP which states in relation to the site that proposals must provide *'community retail centre to serve the development and in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area'*.

#### *Criteria*

- 4.35. Consequently, when identifying the relevant site selection criteria, it is deemed reasonable to consider the site and the proposed development as a whole while applying a degree of flexibility.
- 4.36. This reasoned approach is reinforced by an appeal decision ref APP/X3540/W/20/3250557<sup>7</sup> where the Inspector considered at paragraph 11 that *'the standard approach to these matters is to set a range within a certain percentage of the application site, usually 15 or 20% either way'*.
- 4.37. For completeness, in this instance, it is deemed that a 20% allowance either way of the site area is appropriate (site areas between 13.51 ha and 20.29 ha).
- 4.38. Additionally, the site comprises a number of existing buildings on a brownfield site and accessible to services and facilities necessary for day to day needs while also being accessible by sustainable transport modes.
- 4.39. Consequently, the following selection criteria (operational, financial and locational requirements) have been identified for the purposes of undertaking the sequential assessment:
- Freehold land suitable for development;
  - Site area of between 13.51 ha and 20.29 ha;
  - Location accessible to existing services and facilities;
  - Accessible by sustainable transport modes; and
  - Site with placemaking potential that can 'unlock' and create an attractive destination.

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<sup>7</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3250557>

*Allocations*

- 4.40. Within the Local Plan Policies Map, the site is currently allocated as an ‘Employment Area’ where DMP Policy DM16 supports high-quality employment and business employment development.
- 4.41. However, within the draft GNLP, Policy 7.1 ‘East Norwich’ includes the site as part of a wider allocation which also includes the ‘Deal Ground’ to the east of the site, ‘Utilities Site’ and ‘Land in front of ATB Laurance Scott’ to the north and north east of the site, respectively.

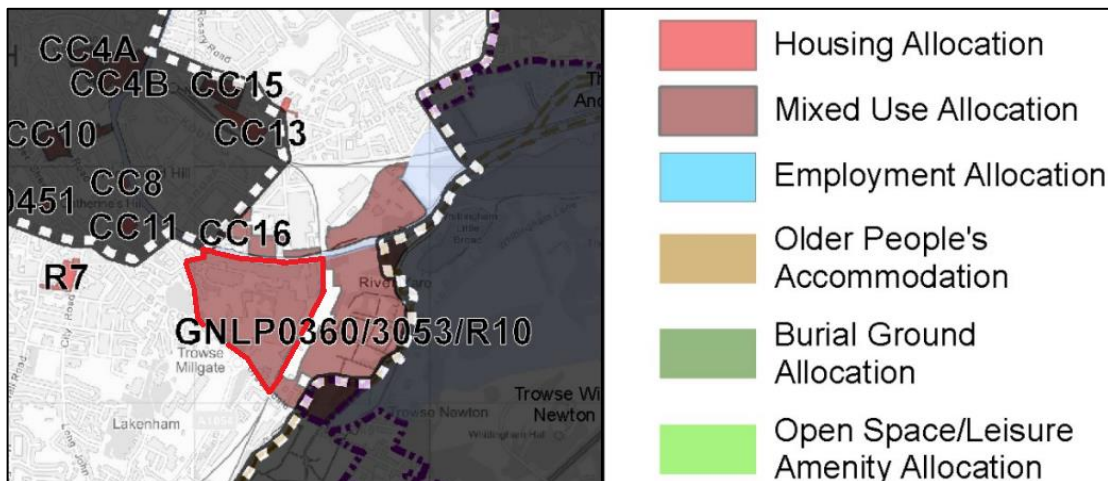


Figure 5: Extract from GNLP Policy Map with the site outlined in red.

- 4.42. The wording of GNLP Policy 7.1 has been amended in June 2022 as part of the examination hearing process of the emerging Local Plan. Among other things, the revised Policy states that the allocation ‘*will create a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits*’.
- 4.43. The GNLP’s strategic allocation ref. GNL0360/3053/R10 goes further by setting out more detailed objectives in relation to the wider allocation. In relation to the ‘Carrow Works’ allocation which relates to the application site, the strategic allocation states, among other things, that ‘*development must also achieve the following site-specific requirements [...] provision of a community retail centre to serve the development and in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means*’ (See Appendix 2).
- 4.44. On this basis, while not a current allocation, it is deemed that the proposed retail element of the proposal satisfies the requirement of the emerging GNLP significantly contributing to the aims of paragraph 87 of the NPPF.

## Impact Assessment

### Requirement

- 4.45. The NPPF specifies that proposals for retail or leisure uses should avoid unacceptable impact on the vitality and viability of existing defined centres. Specifically, paragraph 90 confirms that an ‘impact assessment’ is required for retail or leisure uses that are outside town centres, or are not in accordance with an up-to-date Local Plan and where they exceed a proportionate locally set floorspace.
- 4.46. Among other things, Paragraph 91 states that where an application would have adverse impact on one or more of the considerations in paragraph 90, it should be refused.
- 4.47. At Annex 2 (Glossary), the NPPF defines ‘out of centre’ locations as not in or at the edge of a defined centre. For retail purposes, an ‘edge of centre’ location is described as within 300 m of a primary shopping area, and for any other main town centre uses as a location within 300 m of a town centre boundary.
- 4.48. Within the Local Plan, inter alia, Policy DM 18 confirms that proposals for main town centre uses (including retail) will need to be justified by a retail impact assessment where they are located outside defined centres or not allocated for the proposed use within the Local Plan. The Policy continues that, in terms of the retail impact assessment, proposals will need to demonstrate that:
- they will not result in a ‘*significantly harmful impact to the vitality and viability of the city centre or other existing and proposed centres*’;
  - would avoid compromising planned proposals; and
  - would not significantly undermine prospects for their regeneration, improvement or enhancement.
- 4.49. Inter alia, at Appendix 4, the Local Plan sets out the following specific thresholds where the need for an impact assessment is triggered:
- Large district centres: No specific thresholds
  - District centres: 1,000 sqm floorspace
  - Local centres: 500 sqm floorspace
  - Outside centres: 1,000 sqm floorspace
- 4.50. Appendix 4 continues by stating that the above thresholds are applicable to development proposals “*unless the principle of development at a larger scale has already been accepted through the grant of planning permission or allocation in the Site allocations Plan, and is justified by evidence.*”

- 4.51. As stated previously, the proposed development comprises 12,356 sqm of retail and leisure uses located outside a defined centre. Specifically, the site is located approx. 230 m from the Riverside Retail Park, designated as a Large District Centre within the Local Plan, and 900 m south east of the Norwich Primary Retail area. Therefore, it is deemed that the need for a Retail Impact Assessment is triggered as per DMP Policy DM18 .
- 4.52. It is worth noting that following the changes to The Town and Country Planning (Use Classes) Order 1987 (as amended) which came into force on 1<sup>st</sup> September 2020 some of the proposal's non-residential uses would fall under Use Class E, similar to the proposed retail and leisure.

### *Methodology*

#### *Base Year*

- 4.53. This assessment has used the data within the *Greater Norwich Town Centres & Retail Study (TCRS) Update (2020)* as the basis for analysis of relevant expenditure, shopping patterns, turnover figures and capacity need. This document provided an update of a previous town centre and retail study undertaken in 2017. Consequently, it is deemed that using 2020 as the base year is appropriate in this instance, albeit more recent data will also be used where gaps or weaknesses within the TCRS (2020) may exist due to the limitations of undertaking such as study during the early stages of the Covid-19 pandemic.

#### *Design Year*

- 4.54. Paragraph 018 (ref 2b-018-20190722) of the NPPG states that the impact assessment would need to select a design year which is reflective of when the proposal is expected to achieve a 'mature' trading pattern; the NPPG clarifies that this is typically the second full year after opening of each phase of a new retail development. However, the NPPG acknowledges that this might take longer for some developments.
- 4.55. The proposed development relates to a hybrid application where the entirety of proposed commercial element, including retail and leisure floorspace, is included in outline form. It is expected that full completion of the proposed development, including the residential units, will be by 2038, as per the Phasing Plan attached at **Appendix 3** (floorspaces are not accurate within the Phasing Plan). Since the retail and leisure provision would mainly cater for the future residents of the proposed development, but also of the wider allocation, it considered that the development

would 'mature' by 2038, which was used as a 'Design Year' for the purposes of undertaking the impact assessment.

- 4.56. It is acknowledged that, due to the commercial floorspace being proposed in outline form, there may be a need to review this assessment as part of the subsequent stages of the planning application process, most notably as part of the Approval of Reserved Matters stage.

#### *Population figures*

- 4.57. For population figures, this assessment has used the TCRS (2020) forecast to ensure consistency between population and retail related figures. It is worth noting that Census 2021 data is expected to be published on 28<sup>th</sup> June 2022. Therefore, there may be a need to review the findings of this document if significant discrepancies exist between the existing available population figures (as of 2<sup>nd</sup> June 2022) and the 2021 Census population data, the latter providing more accurate figures.

#### *Area of assessment*

- 4.58. As discussed at paragraph 4.22 of this document, it has been agreed with the Council that the catchment area of the proposed development is 800 m from the site for the purposes of retail planning.
- 4.59. Therefore, it has been agreed that the following centres and their edges would need to be considered as part of the assessment:

No. on map	Centre	Hierarchy	Distance from site
1	The Site	Edge-of-centre	
2	Norwich City Centre	Primary Retail Area	880 m
3	Riverside Retail Park	Large District Centre	230 m
4	Hall Road Retail Park / Sandy Lane	District Centre	1.36 km
5	Hall Road/Trafalgar Street	Local Centre	440 m
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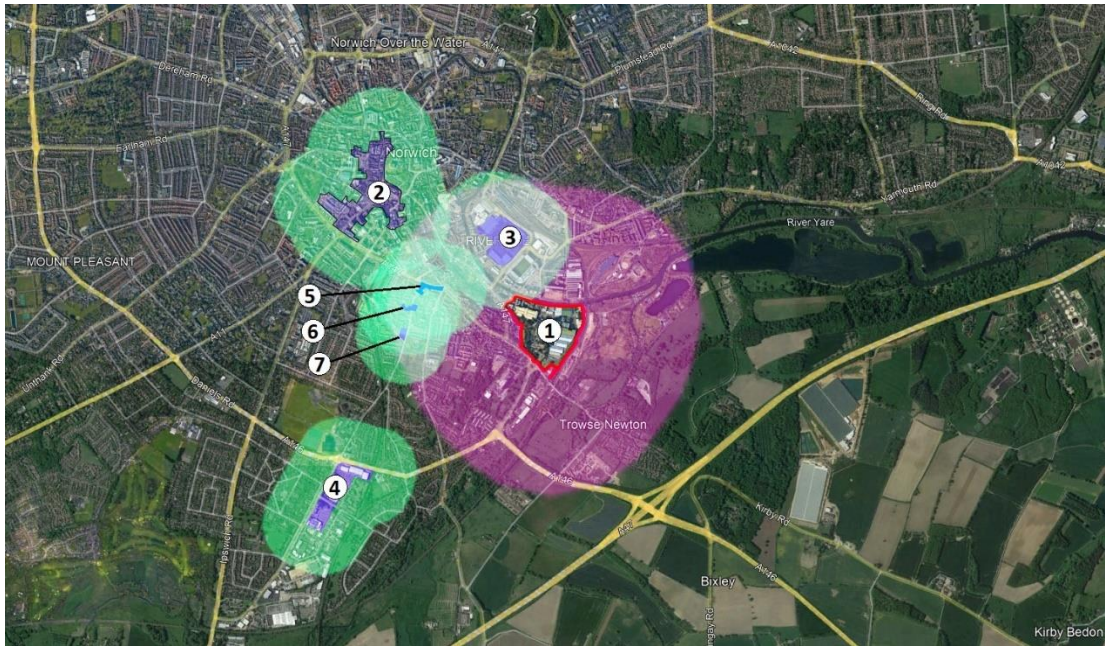


Figure 6: Satellite image showing the centres assessed and their edges (mint) in relation to the site and its catchment area (purple).

- 4.60. In terms of analysing proposal’s impact on existing centres, the assessment needs to look forward into the Design Year and assess these centres by using forecasted figures from TCRS (2020).
- 4.61. Due to the lack of availability of accurate data at a more granular level, the retail impact has used the Norwich TCRS Update (2020) Study Area Zones to assess the forecasted retail context. The 800 m catchment area agreed with the Council falls almost fully within Study Area Zone 2 ‘NR1 1/2/3/4, NR3 1/2/3/4’, albeit considerable parts of Zone 2 falls outside the assessment area. Nevertheless, it is deemed that this will provide a sufficiently reliable source of data for the purposes of assessing the proposal’s potential impact on the defined centres within the catchment area into the ‘Design Year’.

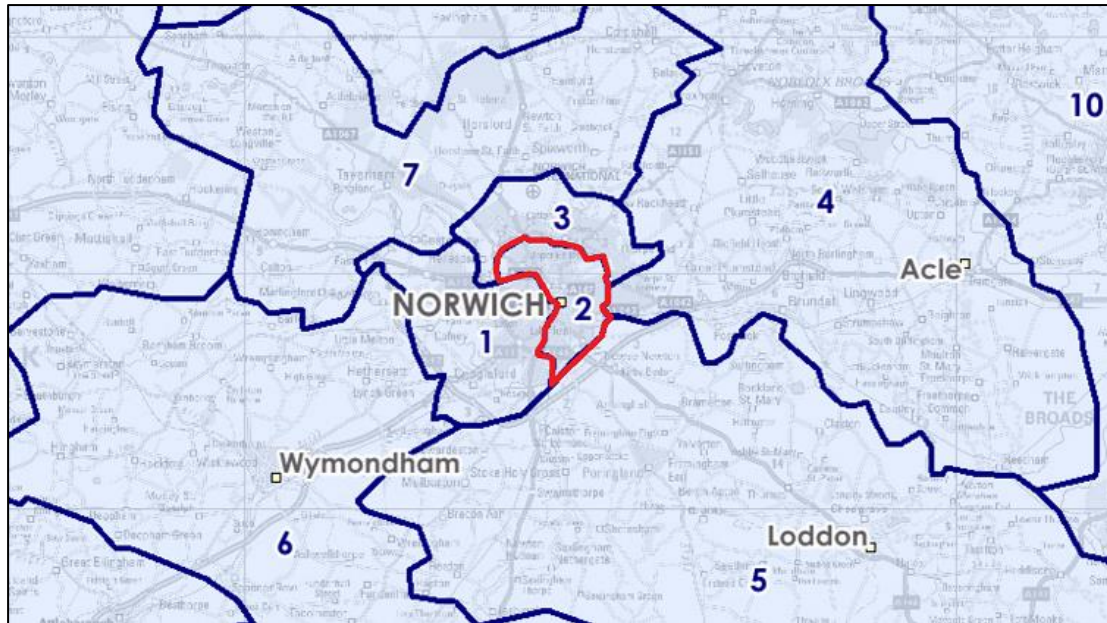


Figure 7: Study area 'Zone 2' (outlined in red) in context with its surroundings.

### Assessment of existing centres

4.62. The defined centres (and their edges) within the assessment area will be analysed against their existing quantitative and qualitative particulars. Among other things, depending on the level of information which was available, the aim of this document is to assess each centre against the following matters (non-exhaustive list):

#### Quantitative

- Accessibility
- Diversity of uses
- Vacancy levels
- Market conditions

#### Qualitative

- Safety
- Environmental context

4.63. In undertaking this element of the impact assessment, a range of sources and tools have been used, including:

- Property Market Information Service (PROMIS);
- Greater Norwich Town Centres & Retail Study (TCRS) (2017);
- Greater Norwich Town Centres & Retail Study (TCRS) Update (2020);
- Local Data Company 'Looking Beyond Lockdown' (2021);
- Norwich Retail Monitoring Report (July 2021);
- Main Town Centre Uses and Retail Frontages SPD (2014);
- Google Maps & Street View;

- Site visits; and
- Social Media data.

#### *Retail and leisure commitments*

- 4.64. Among other things, Paragraph 90 of the NPPF states that impact assessments should include an analysis of “*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*” [my emphasis]. As such, any planned or committed investments outside the boundaries of these centres do not need to be considered.
- 4.65. Therefore, planned and committed leisure or retail developments were identified and analysed using the Council’s planning database, development plan documents, supporting evidence of the emerging GNLP, and EG Radius<sup>8</sup>.

#### *Retail and leisure impact*

2. Using the data and findings of the previous steps, the Impact Assessment then considers the likely impact of the proposed development, on existing and committed designated centres and overall potential impact on their vitality and viability. Among other things, this is undertaken by assessing the following themes:
- Retail patterns;
  - Turnover and retail capacity need;
  - Turnover of the proposed development;
  - Trade diversion patterns;
3. The following main sources are used to undertake the above-outlined assessment:
- Property Market Information Service (PROMIS);
  - Greater Norwich Town Centres & Retail Study (2017);
  - Greater Norwich Town Centres & Retail Study Update (2020);
  - Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local & District Centres Monitor;
  - Office for National Statistics – Retail Industry;
  - Greater Norwich Local Plan;
  - Site Allocations and Site Specific Policies Local Plan;
  - Google Maps & Street View; and
  - Site visits.

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<sup>8</sup> <https://www.egi.co.uk/radius-dx/data/#/location/planning?sectors=S1,S2,S3,S4,S5,S6,S7&unisearchId=6d98cf450983a83b10f7111e9b9f6022&category=Regional>

## 5. Sequential Test Assessment

- 5.1. This section seeks to assess the results of the sequential test against relevant planning policies identified in the section 4 of this document.
- 5.2. The sequential assessment was undertaken between 6<sup>th</sup> and 17<sup>th</sup> June 2022. The following national and local estate agencies' online platforms were used to conduct the search for alternative sites:
- Rightmove (<https://www.rightmove.co.uk/>);
  - OnTheMarket (<https://www.onthemarket.com/>);
  - Realla (<https://www.realla.co.uk/>);
  - PlotFinder (<https://www.plotfinder.net/>); and
  - Prime Location (<https://www.primelocation.com/>).
- 5.3. Additionally, the assessment has analysed potential alternative sites within the Norwich Brownfield Register<sup>9</sup>.

### Estate Agencies

- 5.4. The search revealed that within the assessment area, without applying any specific criteria, only three alternative sites were available. Please refer to **Appendix 4** for the full details of the sites that have been examined, analysed and discounted when the site criteria were applied.
- 5.5. The three potential alternative sites were located within edge of centre locations, and therefore not of a more sequentially preferable location than the application site, which is also located within an edge of centre location.

Site no.	Address	Site Area	Amenities	Accessible	Brownfield	Sequential Location	Sequentially Preferable
1	Vantage House, Pottergate, Norwich	N/A	Yes	Yes	N/A	Edge-of-Centre	No
2	Clarence Rd, Norwich	N/A	Yes	Yes	Yes	Edge-of-Centre	No
3	All Saints Green, Norwich	N/A	Yes	Yes	Yes	Edge-of-Centre	No

<sup>9</sup> [https://www.norwich.gov.uk/downloads/file/4577/brownfield\\_land\\_register\\_xlsx](https://www.norwich.gov.uk/downloads/file/4577/brownfield_land_register_xlsx)

- 5.6. Furthermore, all three sites are of a significantly smaller area which would not be able to accommodate the level of development proposed under this application even when a degree of flexibility is applied.
- 5.7. **Site no. 1** relates to top floor of an existing block of flats with a planning application submitted for four penthouse flats. The small site area is insufficient to accommodate the proposed development.
- 5.8. **Site no. 2** comprises an existing detached former dwelling; the site is significantly smaller than the minimum required to accommodate the level of development proposed.
- 5.9. **Site no. 3** is subject to a lapsed planning permission for 7 self-contained flats. The site is not sufficiently large to accommodate the level of development proposed.
- 5.10. The assessment clearly highlights the lack of sites available for sale within or at the edge of local and district centres within the assessment area that would be suitable to accommodate the proposed development.

#### Norwich Brownfield Register

- 5.11. This assessment has also analysed all sites within the Norwich Brownfield Register<sup>10</sup> which includes 123 sites. Out of these sites, only two sites satisfied the site area criterion (between 13.51 ha and 20.29 ha).

Site no.	Address	Site Area (ha)	Amenities	Accessible	Brownfield	Sequential Location	Sequentially Preferable
4	Deal Ground, Bracondale, Norwich	16.24	Yes	Yes	Yes	Out-of-centre	No
5	Carrow works	20	Yes	Yes	Yes	Edge-of-Centre	Yes

- 5.12. **Site no. 4** is allocated within the Development Plan for a residential led development (ref. R9), but it is located outside any designated centre or edge-of-centre. The site is also proposed to be allocated within the emerging Local Plan. Additionally, the site is subject to outline planning permission 12/00875/O for up to 650 dwellings and currently undergoing approval of conditions and therefore it is not available to the client.
- 5.13. **Site no. 5** is the application site subject to this planning application and is proposed to be allocated within the emerging GNLP as part of the wider 'East Norwich

<sup>10</sup> [https://www.norwich.gov.uk/info/20022/planning\\_policy/2042/brownfield\\_land\\_register](https://www.norwich.gov.uk/info/20022/planning_policy/2042/brownfield_land_register)



Strategic Regeneration Area’. The allocation is for a residential led mixed-use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space.

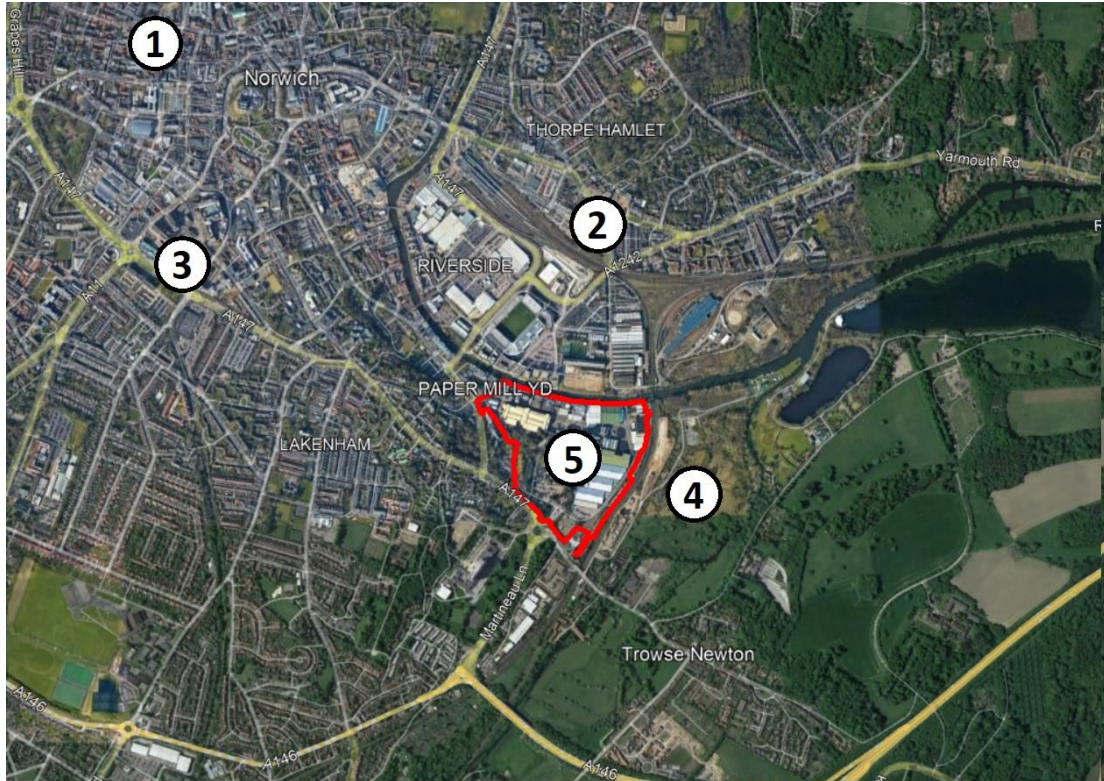


Figure 8: Satellite image showing the location of the potential alternative sites assessed.

- 5.14. Therefore, it is clear that the application site satisfies the sequential test criteria while also being located in an edge-of-centre location; furthermore, it is available now, with commencement of the phased delivery feasible as soon as 2026.

### Findings

- 5.15. The assessment was unable to find any sequentially preferable alternative sites within the jurisdiction of Norwich City Council. It is considered that the main reason is the lack of offer or available brownfield sites within the assessment area of sufficient size to accommodate the level of development proposed.
- 5.16. The site is in a location that is accessible to services, facilities and alternative modes of transport; bus stops are located immediately to the south west of the site along A147/Bracondale, providing a wide range of regular and frequent bus services to destinations such as Norwich City Centre, Great Yarmouth, Lowestoft, Bungay, Belton, Acle and beyond. Therefore, the proposed development is in line with paragraph 88 of the NPPF which states that “when considering edge of centre and

*out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.”*

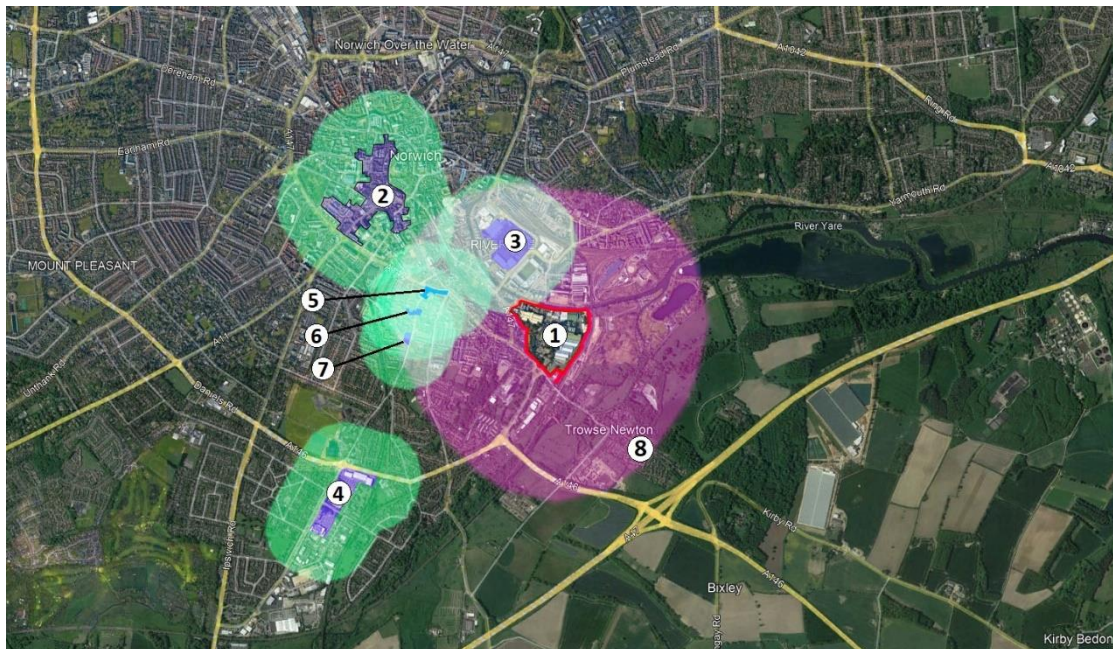
- 5.17. In summary, the assessment of available and comparable sites demonstrated that the sequential test has been satisfied, in line with Local Plan Policy DM18 and JCS Policy 19; the site is considered to be suitable for the proposed use, contributing to the economic, social and environmental dimensions of sustainable development.

## 6. Impact Assessment

### Assessment of existing centres

- 6.1. Using the methodology described at section 4 of this document, the following part analyses the current retail and leisure context of the defined centres within the ‘catchment area’, and subsequently assesses the proposal’s impact on the vitality and viability of these centres.
- 6.2. As identified previously, the following centres have been considered which includes two areas outside the 800 m catchment area.

No.	Centre	Hierarchy
1	The site	Edge-of-Centre
2	Norwich City Centre	Primary Retail Area
3	Riverside Retail Park	Large District Centre
4	Hall Road Retail Park/Sandy Lane	District Centre
5	Hall Road/Trafalgar Street	Local Centre
6	Hall Road/Queens Road	Local Centre
7	Hall Road/Southwell Road	Local Centre
8	Trowse village	Out-of-centre





Norwich City Centre

Context

- 6.3. The Norwich City Centre’s Primary Retail Area (PRA) is the main retail and leisure centre within the vast majority of Norfolk County, with the nearest comparable regional centres being Ipswich and Cambridge, located approximately 40 miles and 60 miles from Norwich, respectively.
- 6.4. The population of the Norwich City ‘Retail Market Area’ (where penetration exceeds 15%) is approx. 618,000, which is well above the national average for town and regional centres.
- 6.5. The Primary Retail Area (PRA) itself has excellent public transport links, especially by bus, with services to a wide range of destinations within the city itself and to settlements throughout Norfolk and beyond.

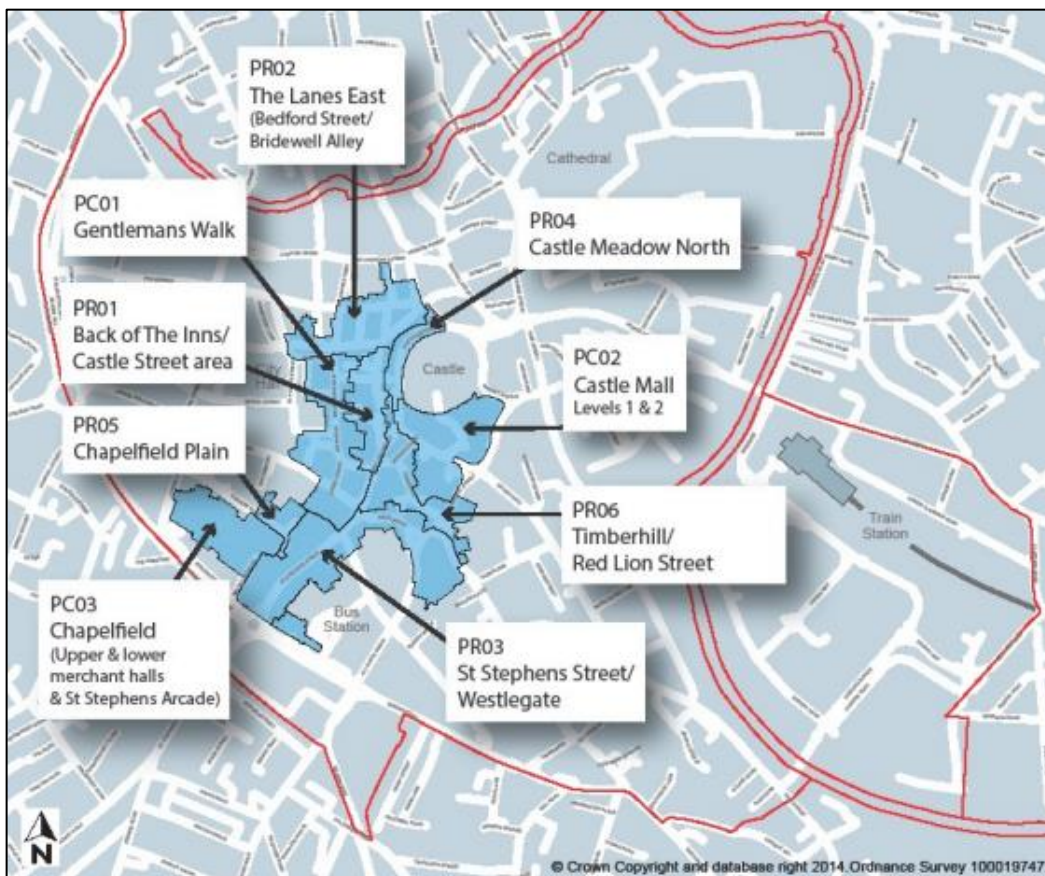


Figure 9: Map showing shopping frontage zones within the Norwich Primary Retail Area (highlighted in blue).

### *Diversity of uses*

- 6.6. The PRA comprises 2 no. shopping centres: **Chantry Place** (formerly known as Intu Chapelfield) and Castle Quarter. Chantry Place which opened in 2005 is the key shopping destination in Norwich including 50,000 sqm of mid market retail and leisure floorspace. The shopping centre consists of three floors, the first two include retail uses with the third level being a dining terrace. Chantry Place's anchor comprises House of Fraser, but it also includes key stores such as Sports Direct, H&M, River Island, and Zara. In addition, other notable occupiers comprise of Boots, Superdrug and Apple.
- 6.7. On the other hand, **Castle Quarter** includes a total of 36,700 sqm of floorspace split between around 80 shops over five floors. The first two floors are mainly retail-focused with third floor comprising a food court. Lastly, floors four and five are occupied by a Vue multiplex. Notably, there are no anchor department or variety stores occupying Castle Quarter where TK Maxx and Boots act as 'mini anchors'. The existing market orientation seems to be centred on value and mass market; however, there seems to have been a change of direction from retail to leisure where Superbowl and Pure Gym are recent occupiers.
- 6.8. Additionally, Norwich PRA includes other key retail areas such as **Haymarket and Gentleman's Walk** described by pedestrianised streets adjacent to the Jarrolds department store with Debenhams store located further south. Notable retailers include Fat Face, Primark, and Hotter with other key retailers including WH Smith and White Stuff. It is worth noting that Primark has recently opened a refurbished and extended store in late 2019.
- 6.9. The streets leading further eastwards, most notably **Back of the Inns, Castle Street, and White Lion Street** provide for great secondary retail locations while the covered **Royal Arcade** parade comprises of small independent fashion shops and cafes.
- 6.10. Cumulatively, these pedestrianised streets which are of a considerable historic significance and character, offer an appealing shopping and leisure environment where the historic small retail units are suitable for many independent shops and cafes that are occupying these units.
- 6.11. To the north east of the PRA, located around **London Road, London Street and Bedford Street**, there is a range of specialist and upmarket retail units such as Space NK and White Stuff as well as Jarrolds and several other independent retailers.
- 6.12. Lastly, the non-pedestrianised **St Stephens Street and Red Lion Street** located to the south of the PRA comprise mainly of mass-market or value retail offer. In terms of



character, the buildings are much newer than the historic centre and generally provide for larger retail units.

- 6.13. The convenience goods offer within the Norwich PRA comprises the following stores:
- Tesco Express on London Street which replaced the previous Tesco on Guildhall Hill;
  - Tesco Express on Westlegate;
  - Sainsbury's Local on St Stephens Street
  - Iceland on St Stephens Street; and
  - Marks & Spencer's foodhall.
- 6.14. In addition to these convenience stores, Norwich Market located off Gentleman's Walk consists of a number of stalls selling fresh and other produce six days a week. It is worth noting that, to the south of the PRA, there is a Sainsbury's superstore, albeit located outside the boundaries of the PRA itself.
- 6.15. Please refer to **Appendix 5** for a full list of key stores within the Norwich PRA.

### *Vacancy levels*

- 6.16. According to the Retail Monitoring Report (July 2021), the floorspace vacancy for retail uses were at 15.2%, an increase from the 10% figure in 2019. Please refer to the table below which outlined the key in- and out-movers within the Norwich PRA.

*Table 2: Key in-movers and out-movers in Norwich PRA.*

Norwich PRA	
Key in-movers	
Location	Entity
Castle Quarter	Leading Labels
Chantry Place	H&M Home
	HMV
	Subway
	The Real Greek
Rest of centre	Pavers Shoes
	Subway
	The Gift Company
	YMCA Shop

Norwich PRA	
Key out-movers	
Location	Entity
Castle Quarter	Burger King
	New Look
	Peacocks
	TUI
Chantry Place	Game
	H&M Kids
	The Disney Store
Rest of centre	Argos
	Game
	Jack Wills
	Jones Bootmaker
	Laura Shley
	The Edinburgh Woolem Mill
	Topshop
West Cornwall Pasty Co.	

- 6.17. In retail terms, the Retail Monitoring Report concludes that, nationwide leisure vacancy rates are lower than retail figures. The report continues by acknowledging that whilst there are difficulties in comparing data due to different methodologies of collecting and analysing data, overall, it appears that the vacancy rates for the city centre *'does increase when other town centre uses are taken into account'*.

#### *Market conditions*

- 6.18. According to the updated Norwich TCRS (2020), Norwich PRA has a 74.1% market share in Zone 2 with an annual spend of £101.9m when it comes to comparison goods allocation. In terms of convenience goods allocation, the PRA comprises a modest 4.2% market share in Zone 2 with a £5.4m annual spend.
- 6.19. The Retail Monitoring Report (2021) acknowledges that retail floorspace within the city centre continues to decrease albeit at a slower rate more recently. Regardless, it states that all retail frontages within the PRA are within the recommended minimum percentage for Use Class E(a) uses (formerly Use Class A1) as set out within the 'Main Town Centre Uses and Retail Frontages SPD (2014)'. The report continues by stating that the proportion of retail has increased in all three frontage zones and that *'overall the retail frontages appear relatively healthy'*.

#### *Riverside Retail Park*

- 6.20. The Riverside Retail Park is designated by the DMP as a Large District Centre under reference 'LD02' and it is the prime retail park in the Norwich city area. It is located on Albion Way, off the A147, and is adjacent to the Norwich train station and Norwich City Football Club. The Riverside's anchors include the Morrisons superstore, Matalan and B&M while also comprising of other key high street retailers such as Argos, Clarks, Next, H&M, Nike and Boots.

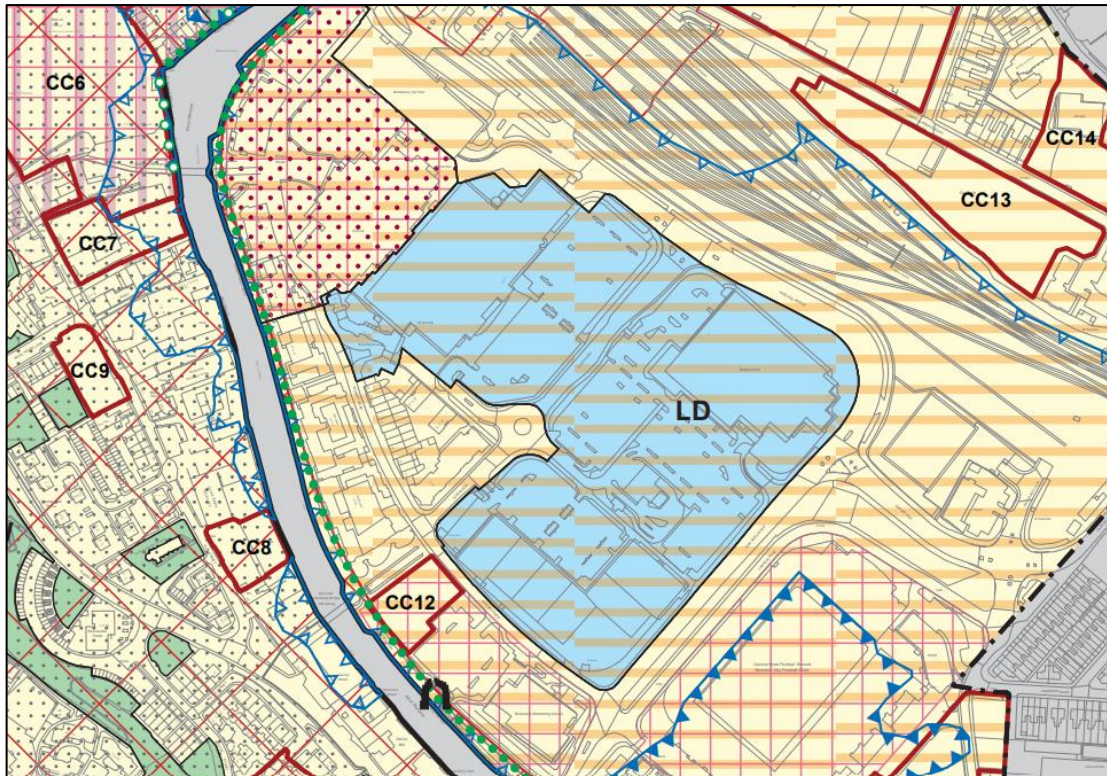


Figure 10: Plan showing the Riverside Retail Park and its surroundings, with Riverside leisure area shown dotted to the north west.

- 6.21. Riverside Retail Park consists of 14 non-food units with a total of 15,236 sqm of gross floorspace, 1 convenience superstore and 2 leisure units. Since 2019, when the retail park was fully occupied, there have been key out-movers such as Outfit, Carphone Warehouse and Mothercare, totalling 2,319 sqm which represents approx. 13% vacancy of the total non-food floorspace available.
- 6.22. Please refer to the **Appendix 6** below for a full list of the current occupiers of the Riverside Retail Park.
- 6.23. When it comes to comparison goods allocation, according to Norwich TCRS (2020), Riverside has a 5.6% market share and an annual spend of £7.6m in Zone 2, while in terms of convenience goods, Morrison's market share in Zone 2 is 14.3% with an annual spend figure of £18.4m.
- 6.24. In terms of the centre's qualitative features, the Riverside Retail Park is largely car focused, but it is also accessible by sustainable transport modes such as bus services (nos. 25, 26, 27, 32, and 36), and by foot or cycle along the riverside, which in itself provides for a recreational activity with a number of leisure uses in the vicinity, to the north west of the LD02 centre.

### *Hall Road Retail Park / Sandy Lane*

- 6.25. Hall Road Retail Park is defined within the DMP as a district centre (ref. DC09) which is best described as a bulky goods retail park located between the city centre and the Norwich bypass, at the junction with Barrett Road (A146). The district centre's anchors comprise Homebase with the remainder of occupiers including Aldi, The Food Warehouse, Home Bargains, Pets at Home, Hughes and Aldiss.
- 6.26. The Sandy Lane district centre has been developed in accordance with the Norwich Site Allocations and Site Specific Policies (2014) under reference R3; it is anchored by the Asda superstore with the remainder of occupiers comprising, among other things, The Gym Group, Costa and Greggs.
- 6.27. Hall Road Retail Park (ref. DC09) and Sandy Lane allocation (ref. R3) are adjacent to each other and in many ways behave as a single centre; therefore, both have been assessed as a single District Centre. The centre includes six non-food retail units totalling 11,055 sqm GIA, and 2 convenience stores, and there are no known current vacancies. Please refer to **Appendix 7** for the centre's occupancy details.
- 6.28. In market share terms, the centre's comparison goods allocation in Zone 2 is 3% with an annual spend of £4.2m, whilst the convenience goods allocation (Asda) had a 3.8% share in Zone 2 with a £4.8m annual spend.
- 6.29. Overall, the retail park is mostly car focused but easily accessible by public transport with a wide range of bus services provided at bus stops along Hall Road, Sandy Lane and Barret Road.
- 6.30. Due to its location away from the city centre, it is deemed that the centre generally caters for residents of the immediate surrounding area and commuters who use Hall Road as a main route to/from Norwich.

### *Local Centres*

- 6.31. The Policies Map identifies three centres within 800 m of the site which are located within 500 m of each other along Hall Road. Their 300 m edge of the centre (as defined within the NPPF) overlap each other. As such, there is an element of unity between these centres where certain retail uses are located within the edges of more than one centre.
- 6.32. In terms of accessibility, due to the proximity between these centres, they are serviced by a similar range of bus routes which provide regular services to many destinations, including Norwich, Lowestoft, Southwold, Mile Cross, Tuckswold and

beyond (bus nos. X1/11, X2/21/22, 40/41/X41, 37B and 39/A). Bus stops are located along Queens Road, Southwell Road and Hall Road.

- 6.33. **Hall Road/Trafalgar Local Centre** is designated under 'LC01' within the Local Plan and is located at the junction between Hall Road and Trafalgar Street, approximately 200 m to the south of A147/Queens Road.
- 6.34. This local centre comprises 12 no. non-residential units of which 7 units comprise main town centre uses (MTCUs), and two units are either vacant or temporarily closed. Furthermore, of the 7 no. MTCU units, only four consist of a leisure or retail use. Please refer to **Appendix 8**.
- 6.35. Within local centre LC01, all retail and leisure units are of small scale where the convenience store and the charity shop generally satisfy the needs very locally whereas two of the units provide for a specific market (i.e. fireworks, creamery) where it is reasonable to suggest that they provide for a wider catchment area.
- 6.36. In relation to the qualitative dimension of the local centre, it is deemed that the area feels generally safe, albeit some of the MTCU units appear slightly run-down or dated. Immediately to the east of the centre, there is St Mark's Church with its surrounding graveyard which can provide for a short recreational activity.
- 6.37. **Hall Road/Queens Road Local Centre** is generally located along the southern part of Queens Road between Hall Road and City Road and it is designated under ref. 'LC02'.
- 6.38. It is worth noting that there is a range of MTCUs along Ber Street within the 300 m edge of this centre. However, these units are also located within the edge of the Norwich Primary Retail Area located closer than LC02. Consequently, it is considered reasonable to identify these units within the catchment of Norwich PRA, which is of a far greater retail significance than LC02.
- 6.39. LC02 centre is the more significant of the local centres within the proposal's catchment area and comprises a total of 32 non-residential units, of which only 13 are either under leisure or retail use with 6 no. vacant units. The local centre has a 18.75% vacancy rate out of the total quantum of non-residential units. Please refer to **Appendix 9** for further occupancy details of LC02.
- 6.40. While there is a green open space immediately to the north west of the centre and the centre being well-lighted after sunset, it has little recreational use due to lack of seating and the significant noise generated by the vehicular traffic along Queens Road



- 6.41. **Hall Road/Southwell Road Local Centre** is located at the junction between Hall Road and Southwell Road, and approximately 250 m to the south of local centre LC01. It is designated under ref. 'LC03'.
- 6.42. The LC03 centre is the smallest of the centres assessed and comprises 7 non-residential uses of which 5 are either retail or leisure uses with no vacant units. Most notably, this centre includes a Co-op supermarket. Please refer to **Appendix 10** for further details.
- 6.43. It is considered that four of the units have a very local catchment area, which does not extend into the application site, while the remainder have a broader catchment area. However, of particular interest, Co-op supermarket is a mid-sized convenience store with 11 no. car parking spaces which could in theory compete directly with the foodstore proposed under this application.
- 6.44. This centre does not comprise of any seating areas or public space that would allow people to remain in the area for longer than it is necessary.

#### *Trowse village*

- 6.45. Trowse is located within South Norfolk District's jurisdiction. Its development plan does not identify any centre within the village. Nevertheless, this assessment will analyse the proposal's impact on any existing retail or leisure uses within Trowse.
- 6.46. Within the village, the range of retail and leisure provision is limited to a café and two public houses (**see Appendix 11**). Trowse village is served by regular bus services (bus nos. 40 and 41) which provides services to Norwich, Bungay and Poringland, among other destinations.



## Retail and Leisure commitments

### *Anglia Square*

- 6.47. An application to redevelop Anglia Square was called in by the Secretary of State and rejected in early 2020. The developers have submitted a renewed application (ref. 22/00434/F) for a mix-use development, including 1,100 dwellings and up to 8,000 sqm of flexible retail, commercial and other non-residential floorspace. The determination deadline of this application is 18<sup>th</sup> July, albeit it wouldn't be unlikely that this would be extended further considering the controversy of this scheme. Regardless, the site is not within the agreed catchment area of the proposed development.

### *Deal Ground*

- 6.48. As stated previously, the site subject to this application is part of a wider allocation within the Development Plan for a residential led development which includes the Deal Ground site (ref. R9). Still, Deal Ground is located outside any designated centre or edge-of-centre and does not include any retail provision within its allocation.

### *Eastern Electricity Board Site, Duke Street*

- 6.49. A planning application (ref. 22/00243/F) has been submitted for the demolition of existing buildings and the erection of a new purpose-built student accommodation which would also include a new café and gymnasium. The retail aspect of this proposal is limited in scale and would comprise of a localised catchment area. The site forms part of an allocation ref CC21. The site is located outside any defined centre.

### *No. 5 Guildhall Hill Norwich*

- 6.50. A planning application (ref. 21/00494/F) was granted in August 2021 for various extensions and alterations to existing building and conversion to a hotel and other uses including a restaurant, takeaway and flexible commercial floorspace. Under the application, the existing Use Class E floorspace will be reduced by 2,622 sqm. The proposed restaurant will be ancillary to the main use as a hotel, while the takeaway is expected to have a localised catchment area.

### *Ailwyn Hall*

- 6.51. Planning application (ref 21/00942/F) was submitted for the demolition of existing structure and erection of a hotel with a leisure use at ground floor. The determination deadline was 29<sup>th</sup> September 2021, but a decision is still forthcoming. It is reasonable to assume that the food & beverage unit at ground floor would be an ancillary element of the wider proposal. Regardless, the site is located outside any designated centre.

## Retail and Leisure Quantitative Forecast

### *Local economy*

- 6.52. In the first instance, it is important to analyse the current economic context of the city of Norwich as a background in assessing the existing centres within the catchment area.
- 6.53. The largest employment category is the private sector which consists of 62% of the total employment; most notably, professional & business services and finance sectors account for an above average 13.4% of total employment with leisure and retailing comprising for 28.4% of total employment with the public sector accounting 16.3%.
- 6.54. It is clear that the Covid-19 pandemic had a considerable impact on a wide range of retail, catering and leisure entities. While the pandemic restrictions have been removed, it is acknowledged that consumer behaviour has shifted to a certain degree with footfall maintaining below pre-pandemic levels, with online spending becoming more entrenched. A number of retailers and other operators have fallen into administration while others have sought to consolidate their store portfolio, with impacts on the overall levels of retail employment. Leisure and retail operators may face further challenges due to the governments withdrawal of rates relieve and other support measures in addition to rising inflations have put pressure on disposable incomes.
- 6.55. Still, some signs of expansion are now emerging, even as of July 2021, there were some positive signs outlined within the Retail Monitoring Report (2021); Specifically, the report states that all retail frontages within the Norwich PRA are within the recommended minimum percentage for Use Class E(a) uses (formerly Use Class A1) suggesting that *'overall the retail frontages appear relatively healthy'*.

- 6.56. This level of recovery is confirmed by recent news of well know brands announcing new shop openings in Norwich<sup>11 12</sup>.

#### *Retail patterns*

- 6.57. On a national scale, the ONS Spring 2022 retail data<sup>13</sup> states that within the UK, overall retail sales increased by 6% in 2021. Still, the ONS figure suggest that there is restraining impact on the overall retail sales volumes due to inflation and the indirect effects of the war in Ukraine. The ONS continues by providing a forecast which expects '*continued significant diversion of non-food retail sales to online, albeit moderating slightly on the level seen in 2021 as consumers return to physical stores.*'
- 6.58. The non-retail or online sales rose to 27% in April 2022, however, this rate is significantly lower than the 37.6% figure for February 2021. Still, it is acknowledged that the online sales are significantly higher than the pre-pandemic levels of 19.9% in February 2020.
- 6.59. Moreover, in terms of leisure uses, the ONS data shows that average spend has recovered to a certain extent in 2021, however, due to pressures on the disposable incomes, it expects that the recovery pace might be slower in 2022.

#### *Population data*

- 6.60. Data provided by Experian suggests that the population within Greater Norwich in the Design Year (2038) will be approx. 511,166, within Urban Norwich 211,535, while Zone 2 is expected to have a population of 68,049, an increase of 4,378 from 2020.
- 6.61. The proposed development comprises approx. 1855 new dwellings with 974 expected to be delivered by 2028 and all 1855 by 2038; this would translate to approx. 4,452 additional residents (at an average occupation of 2.4 persons per dwelling). The expected population growth for Zone 2 as per Experian figures are lower than the expected additional residents that would occupy the proposed development and excluding any other population growth in the remainder of Zone 2. Therefore, it is likely that the Experian population figure modelling has not accurately considered the delivery phasing of East Norwich Masterplan. This is deemed to be a key consideration in assessing the retail expenditure forecast, shopping patterns and the proposal potential impact on nearby centres. Please refer to **Appendix 12** for population forecast data.

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<sup>11</sup> <https://www.eveningnews24.co.uk/news/business/chantry-place-deals-for-four-new-brands-8433616>

<sup>12</sup> <https://www.eveningnews24.co.uk/news/business/five-new-shops-opening-soon-in-norwich-9095634>

<sup>13</sup> <https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>

- 6.62. It is worth noting that 2021 Census data will be published on 28<sup>th</sup> June 2022 which may result in the need for these figures to be reviewed if they differ considerably from the forecasted population data.

#### *Retail expenditure forecast*

- 6.63. This section assesses the retail expenditure forecast of the surrounding area and Zone 2 in relation to convenience and comparison goods using data from Experian and Norwich Town Centres and Retail Report (TCRP).
- 6.64. The current data shows a sustained increase in online spending into the future, especially in relation to comparison goods. Therefore, the 'bricks and mortar' stores across Zone 2 and beyond would be directly affected by this forecasted change in shopping pattern. Using this data, this assessment concludes that the internet share for comparison goods in the Design Year would be approx. 26% for the Greater Norwich area. Still, it is deemed that, for Norwich Urban area (including Zone 2) a lower percentage would be applicable where accessibility to a wide range of comparison goods retail floorspace is significantly higher than the rural areas around Norwich.

#### *Retail need capacity*

##### *Convenience goods*

- 6.65. Based on the findings within the TCRP, the above figures in relation to expenditure forecast suggest that there is approx. 990 sqm capacity for new convenience goods floorspace (sqm net) within the Norwich urban area.

##### *Comparison goods*

- 6.66. In summary, it is found that there seems to be a considerable amount of capacity comparison goods need floorspace within Norwich Urban area. However, as highlighted within the MTCR, these figures need to be considered in light of the significant level of floorspace that has become available due to closures of major retail provides as such considerable amount of comparison goods capacity floorspace would be absorbed by the GIA that has become available through these closures.
- 6.67. Consequently, the quantitative capacity levels' forecast has changed from 'negative' to 'positive' with a modest capacity 'surplus'. The MTCR suggests that this low 'surplus' does not justify the need to allocate additional comparison floorspace. However, the report continues that *'there may be qualitative reasons to provide for*

*new convenience floorspace, which could be based upon spatial considerations in order to provide easy day-to-day access to convenience retail provision.'*

- 6.68. Moreover, the MTCR identifies examples where vacant floorspace can absorb most of the capacity need such as the former Toys R Us; This building has since been demolished and replaced by a large purpose built student accommodation with no retail or leisure floorspace. It is expected that other such retail floorspace could experience a similar outcome therefore 'freeing' additional comparison floorspace capacity.

#### *Floorspace efficiency*

- 6.69. It is worth noting that efficiency of many existing retail units will be increased by maximising the quality and efficiency of floorspace either by subdividing existing units and releasing them for various other uses, or alternatively, combining floorspace to create a single unit. This will help energise the competitiveness of retail businesses by supplying them with a significant level of adaptability to address changes in market conditions. Furthermore, it is expected that a considerable amount of leisure or retail floorspace will be subject to changes of use to other main town centre uses, such as offices, or to residential properties.

#### Proposed development

##### *Turnover*

- 6.70. As discussed at section 3 of this document, the proposed development includes 23,627 sqm of commercial floorspace of which it is proposed that 12,356 sqm will comprise retail or leisure floorspace.
- 6.71. While this element of the proposal is in outline form, it is expected that the retail and leisure floorspace will be provided as per the following table:

Area	Building No.	Retail or Leisure (sqm)	Proposed use
1	92	250.75	Leisure/Comparison retail
1	207	1314	Convenience Retail
1	206/5	305.5	Leisure
1	7/7A/8/8A	1,239	Leisure
1	209	723	Comparison Retail
1	1B	850	Comparison Retail
2	New	788	Convenience Store
2	New	1,001	Comparison Retail
2	New	1,044	Comparison Retail



3	N/A	664	Comparison Retail
10	N/A	2,203	Convenience Retail
11	N/A	1974	Leisure
<b>Total</b>		<b>12,356.25</b>	

- 6.72. On this basis, the proposed development comprises 5,305 sqm of convenience GIA floorspace, 4,407.4 sqm of comparison floorspace and 3,643.6 sqm of leisure floorspace GIA.
- 6.73. In terms of actual net floorspace, for comparison units, a figure of 80% of the total gross floorspace was used, whereas a 70% figure was used for convenience and leisure floorspace. This is considered as an acceptable approach in this instance.
- 6.74. In relation to sales density, an average figure of £6,000 per sqm was assumed for comparison retail floorspace, which derived from Global Data and Mintel's Retail Ranking and Lichfields studies, whereas a £11,000 per sqm figure was used for convenience goods sales density. The Global Data and Mintel's Retail Ranking estimates a £5,000 per sqm sales density for food and beverage outlets.
- 6.75. On this basis, the following turnover figures would apply to the retail and leisure units proposed under this application:

	GIA (sqm)	NIA (sqm)	Sales density / sqm	Turnover (£)
Convenience Goods Retail	4,305.00	3,013.50	11,000.00	33,148,500.00
Comparison Goods Retail	4,407.38	3,525.90	6,000.00	21,155,400.00
Leisure	3,643.88	2,550.71	5,000.00	12,753,562.50
<b>Total</b>	<b>12,356.25</b>	<b>9,090.11</b>		<b>67,057,462.50</b>

#### *Trade Diversion*

- 6.76. Paragraph 015 (ref 2b-015-20190722) of the NPPG states that, in general, impact assessment should be undertaken on a like-for-like basis in respect of the particular sector. While the retail and leisure elements of the proposed development are in outline form, the indicative layout proposes a retail and leisure uses as identified in the Table below.

Zone	Building	GIA Retail or Leisure (sqm)	Indicative proposed use
1	92	250.75	Wine Bar & Local Retail
1	207	1314	Foodhall
1	206/5	305.5	Café
1	7/7A/8/8A	1239	Leisure

1	209	723	Local Retail
1	1B	850	Foodhall
2	New	788	Local Retail
2	New	1001	Local Retail
2	New	1044	Local Retail
3	N/A	664	Local Retail
10	N/A	2203	Food Retail
11	N/A	1974	Food and beverage
<b>Total</b>		<b>12356.25</b>	

- 6.77. Most of these units will cater for the future residents of the proposed development but also of the proposals subject to the wider allocation (ref. GNLP0360/3053/R10). Nevertheless, it is acknowledged that some of the proposed leisure and retail turnover would be drawn from areas outside the site and within the catchment area.

#### *Leisure*

- 6.78. In leisure terms, it is believed that a portion of the leisure floorspace would generally attract the proposal's occupiers or people who work within the site, with another portion of the leisure floorspace catering for consumers beyond the wider allocation's boundaries. However, it is expected that, by extending the riverside area further and creating a link between the city centre and Whittingham Broad (as part of the wider allocation), while also unlocking the heritage value of the Carrow Priory, the site would become part of Norwich's network of visitor attraction destinations.
- 6.79. Consequently, to a certain degree, the proposal would help increase the time spent by visitors in Norwich, therefore, it is deemed that the leisure elements of the proposal would enhance the vitality and viability of the centres within the catchment area, most significantly Riverside Retail Park, which would significantly benefit from the enhancement of the riverside walk and cycle route. Additionally, marginal benefits would also be experienced by Norwich City Centre by encouraging more tourism into the city.
- 6.80. Nevertheless, it is possible that leisure uses within the Queens Road/Hall Road Local Centre (ref. LC02) would experience trade diversion from the proposed development. Still, the current leisure offer in LC02 is mainly focused on public houses, whereas the indicative proposed leisure floorspace would comprise a wine bar, café and a food and beverage unit. As such, any diversion from LC02 would be minimal in nature which would be compensated by the benefits of the additional expenditure that would be available to these leisure uses as a result of the proposed development.
- 6.81. In addition, it is likely that a degree of trade diversion could exist from the edge-of-centre leisure units around the Riverside Retail Park, Local Centres refs. LC02 and

LC03 and from leisure units within Trowse village. This diversion would be limited in nature due to the proposal's provision of upmarket leisure units which would be at odds with the existing provisions at the edges of these centres.

### *Retail Comparison Goods*

- 6.82. In terms of comparison goods, the proposed development comprises 4,407 sqm GIA across 6 units of no more than 1,044 sqm GIA floorspace individually. Therefore, it is considered that the proposal's comparison goods offer would generally have a local catchment focusing on the occupiers of the uses proposed under this application.
- 6.83. However, it is recognised that a low level of diversion would occur from nearby defined centres, in particular in relation to the centres which are wholly within the 800 m catchment area, including Riverside Large District Centre and the local centres along Hall Road.
- 6.84. In regards to the local centres, most comparison goods retail units would be subject to minimal impact due to the existing convenience units catering for a specialised market that would be unlikely to compete with the retail provision proposed (i.e. fireworks shop, beds or furniture stores).
- 6.85. When considering the Riverside Retail Park, the retail offer of this centre is significantly greater than the proposed development. Therefore, it is deemed that the comparison goods retail diversion from this centre would be limited; on the contrary, the proposed development itself is located at the edge of Riverside Retail Park (ref. LD02) therefore significantly contributing to its vitality and viability by virtue of the additional turnover being made available in its catchment area.
- 6.86. On its own, it is considered that the proposed development would divert a limited level of trade from Norwich PRA; however, the proposal would create a link between major visitor attractions within the city centre and the riverside, as such, it is expected that a level of footfall from the city centre would be diverted outside, along the riverside. The trade diversion would be of a limited level due to the lack of retail diversity proposed; any impact would be outweighed by the benefits of the proposal by creating a better visitor environment that encourages visitors to spend more time in the city with indirect benefits to the vitality and viability of these centres.
- 6.87. It is considered that there would be negligible trade diversion from the Hall Road/Sandy Lane District Centre due to the distance which is not considered to be 'walkable' (over 800 m), but also due to the fact that the centre is mainly accessed by car where direct bus services between the site and the centre are not available.

### *Retail Convenience Goods*

- 6.88. There are a number of convenience stores located in the designated centres within the study area. The Norwich Primary Retail Area comprises a relatively modest number of convenience stores when having regard to the centre's overall size. Furthermore, these stores have a local catchment area, unlikely to be materially affected by the proposed development.
- 6.89. In regards to the Riverside Retail Park (ref LD02), the convenience goods retail offer is provided at a larger scale (Morrison's superstore) than the proposed development. There would be minimal diversion from this centre but this diversion would be significantly outweighed by the outflow from the proposed development due to proximity and better provision.
- 6.90. When considering Hall Road Retail Park/Sandy Lane (ref. DC09/R3), the convenience floorspace is provided by a large Asda superstore and a medium sized Aldi. As with the Morrison's within the Riverside Retail Park, it is deemed that there would be very limited diversion from the Asda superstore. However, when considering Aldi supermarket, it is deemed that there could be a degree of trade diversion from the proposal if the proposed foodstore would be in direct competition with Aldi. The trade draw would not be necessarily from the immediate area (as the two are located outside each other's catchment area), but likely from customers in the immediate rural areas outside Norwich, using the A146.
- 6.91. In relation to local centres, there are a number of convenience stores. However, these are mostly modest sized grocery stores with a specialised offer and/or a very local catchment area. However, the Coop located in LC08 Southwell may experience notable trade diversion as a result of the proposed development.

### **Impact on vitality and viability of centres**

- 6.92. In summary, the designated centres within the proposal's catchment area have performed above average during and after the pandemic with retail frontage occupation rates above the minimum requirements set by the Council. Still, vacancy rates have increased in two of the centres, Riverside Retail Park and Hall Road/Queens Road, with the latter being the most considerably affected.
- 6.93. There are signs of recovery from the peak of pandemic in-store expenditure figures, albeit this recovery is likely to be slowed down by the increasing inflation rates and the indirect results of the war in Ukraine.

- 6.94. These slowing down factors are likely to be temporary which would not remain a defining feature of the local retail and leisure economy in the long term up to the proposal's Design Year (2038).
- 6.95. Some recovery from the peak of the pandemic high online spending values has been experienced nationwide, however, the figures are still well above the pre-pandemic levels. Nevertheless, whilst the value rate of online spending was accelerated by the lockdown measures, ONS data shows that this momentum is slowing down with value rates expected to get closer to online spending forecasted before the pandemic.
- 6.96. It is recognised that while there is a considerable comparison capacity need into the Design Year, this capacity would be balanced out to a degree by the floorspace becoming available as the result of retail and leisure businesses closures. Nevertheless, it is deemed that some of the floorspace that would become available as a result of closures would be absorbed by changes to other uses (such as residential), either using permitted development rights or via planning permissions. In terms of convenience retail floorspace, it is acknowledged that there is no significant capacity within the Norwich Urban Area.
- 6.97. The retail and leisure elements of the proposed development would mainly cater for the day-to-day needs of the future residents of the proposed development and the wider allocation, part of the Norwich East Masterplan. However, it is recognised that there would be modest diversion from certain retail and leisure units within the proposal's catchment area.

#### *Norwich Primary Retail Area*

- 6.98. In terms of the impact on Norwich PRA, there would be negligible impact on the existing convenience retail offer due to the scale of the existing convenience stores within the PRA which cater for a localised catchment area, unlikely to include the application site. Additionally, Morisons superstore is located between the site and the PRA and is likely to further minimise any impact of the proposal on the existing convenience retail offer within the PRA.
- 6.99. The comparison retail and leisure floorspace provision and diversity within the Norwich PRA is far greater than the floorspace proposed under this application. As such, it is concluded that there would be a modest diversion from the PRA, likely as a result of a portion of the footfall being diverted along the riverside through the site in the form of visitors. Any such diversion is likely to increase the time spent by visitors in the area with benefits to the PRA. This benefit would considerably outweigh any negative impact on the existing comparison retail offer.



6.100. Overall, it is considered that the proposed development would have a modest positive impact on the comparison and leisure uses within the RPA with negligible impact on convenience floorspace.

*Riverside Retail Park*

6.101. The application site is located within the edge of Riverside Retail Park, a designated Large District Centre. In terms of convenience retail impact, it is deemed that the proposal would provide significant benefits to the retail park due to the greater offer provided by Morrisons superstore, the distance between the site, and the retail park likely to attract a portion of the future residents of the proposal with considerable outflow from the proposed development.

6.102. Regarding comparison floorspace, the proposed development may have a limited impact on the retail park; however, due to the higher provision of floorspace within the Riverside Retail Park, it is expected that the Large District Centre would considerably benefit from the additional expenditure which would result from the proposal being delivered.

6.103. Consequently, the available expenditure that would result from the proposed development would have significant positive impact on the vitality and viability of the Riverside Retail Park, considerably outweighing any limited impact on the existing comparison and leisure floorspace.

*Hall Road Retail Park / Sandy Lane*

6.104. Firstly, it is important to note that the Hall Road Retail Park / Sandy Lane District Centre is located outside the proposed development's 800 m catchment area. Regardless, the district centre has no vacancies which suggest that it has a strong vitality and viability.

6.105. Furthermore, it is deemed that the district centre is car-focused which mainly caters for commuters and the residents in the immediate surroundings. The comparison retail provision comprises great floorspaces which would not be of a similar type than those proposed under this application and as such there would be limited impact from the proposal.

6.106. In relation leisure and convenience retail floorspace, there may be an impact from the proposed development which is considered to be of a low scale that would not adversely harm the vitality and viability of the district centre.

### *Local Centres & Trowse village*

- 6.107. When considering the impact on the local centres, it is deemed that there would be a modest negative impact on the existing comparison retail offer due to the small catchment areas of some of these units.
- 6.108. In regard to convenience goods retail floorspace, the proposed development would have a minimal impact on most existing floorspace due to their specialised offer (i.e. Indian or Polish grocery store). It is recognised that there is potential for a notable impact on the Co-op supermarket off Hall Road. Nevertheless, it is considered that any impact would be limited as there is better convenience goods floorspace provision in closer proximity at Sainsbury's superstore at Brazen Gate off Queens Road, 300 to 400m from these local centre. As such, any diversion has already been absorbed by the Sainsbury's superstore with the Co-op catering mainly for local needs only. Furthermore, the proposed development and the Morrisons at the Riverside LDC are both located approx. 1 km from the Co-op, with the latter likely providing a greater and more diverse convenience goods offer.
- 6.109. Lastly, the proposed retail and leisure floorspace would have a notable impact on the leisure provision within the local centres, most notably in relation to the public houses located within Hall Road/Queens Road local centre (ref. LC02) and Trowse village. It is expected that the proposed development would provide for a different type of leisure uses including upmarket wine bar, café and a food and beverage unit therefore increasing leisure offer and diversity. It is likely that the available expenditure that would result from the proposal coming forward would outflow into these leisure units with notable benefits, outweighing and trade draw.

### *Findings*

- 6.110. Paragraph 018 of the NPPG (ref 2b-018-20190722) states that local circumstances will be taken into consideration when assessing whether likely adverse impacts are significant; as an example, the paragraph continues by stating that, for centres with a high level of vacancy rates, a modest trade diversion from new development may result in a significant adverse impact.
- 6.111. In general, most centres within the catchment area fared well in the post pandemic era where only three centres experience vacant units. While there are significant vacancy rates of 15.2% of total floorspace in Norwich PRA, the overall retail frontages are above the minimum requirement. The Riverside Retail Park also has a vacancy rate of 13% of the total non-food GIA. The proposed development would result in modest benefits to the vitality and viability of Norwich PRA and Riverside Retail Park.

- 6.112. It is deemed that the retail floorspace of LC02 'Hall Road/Queens Road' local centre is most likely to be affected by the retail provision proposed under this application, but also by the additional expenditure that would result from the residential element of the proposal and the wider allocation, once delivered. It is considered that the mostly modest-sized retail units within LC02, when compared to the units proposed, mainly provide for a specialised market which are not likely to be notably impacted by the proposed development; there would be only a limited number of retail units that would experience modest trade diversion from the proposed development. However, it is likely that LC02 would mainly cater for lower rental retail floorspace whereas the proposed development would cater for a more upmarket higher rent retail market which is likely to result in retail floorspace with low competition levels.
- 6.113. **Consequently, any negative retail or leisure impact on the vitality and viability of the existing centres within the catchment area would be minimal to moderate,** significantly lower than the 'significant adverse impacts' threshold set by paragraph 005 of the NPPG. Furthermore, any such impact would be considerably outweighed by the benefits of the proposal coming forward including its resulting additional available expenditure which would outflow into the surrounding centres, most notably Riverside Retail Park, Norwich PRA and, to a certain extent, LC02, albeit it is recognised that a portion of these benefits may not become available in full until the Design Year (2038).
- 6.114. The proposed development, which forms part of the residential led allocation within the emerging GNLP, would make an effective use of brownfield land unlocking a key area of the city. The proposal would increase the overall expenditure in the surrounding area and, together with the Deal Ground allocation, would attract visitors from the surrounding area to the Norwich riverside while also increasing the average time spent by visitors in the Norwich area by enhancing the existing network of visitor destinations and recreational infrastructure.
- 6.115. Consequently, the proposal comprising a residential led mixed use development would provide a range of benefits that would contribute significantly to the economic, social and environmental dimensions of sustainable development.

## 7. Conclusion

7.1. The application seeks hybrid planning permission for a residential-led development, supporting non-residential mixed-uses (incl. Class E and F1) at Carrow Works, Kings Street, Norwich. Overall, it is considered that the proposed development is acceptable in retail and leisure terms for the following reasons:

- The application site lies in an 'edge of centre' location approximately 230 m from the Riverside Retail Park which is designated as a Large District Centre.
- The retail sequential test assessment demonstrates that, within the catchment area, there are no suitable or available sites located within a sequentially preferable location even if a degree of flexibility is applied; this is mainly due to the very limited available sites that meet the assessment's criteria.
- While the retail and leisure sectors have experienced unprecedented challenges due to the government's pandemic restrictions, Norwich as a whole fared better than the national average.
- There are clear signs of recovery albeit these are slowed down by the increase in online shopping, increasing inflation rates and the indirect results of the war in Ukraine.
- The existing centres within the catchment area are relatively healthy but, some, with notable vacancy rates. Most of the local centres mainly cater for specialised offer or very localised market whereas the retail parks are mainly car focused and provide for large retail floorspace units. Norwich PRA overshadows any other centre within most of the Norfolk region due to its overall retail and leisure floorspace and diversity provision.
- The proposed development would result in modest impact on very limited sections of a few of the centres, most notably comparison retail units at Hall Road/Queens Road and to a smaller extent, the Co-op supermarket at Hall Road/Southwell Road. These impacts would be minimal to modest in level and would not result in a significant adverse impact on their respective centres.
- Any negative impact on a local centre would be for a medium term. In the long term, the proposal would result in additional available expenditure with significant benefits to the centres within its catchment area, most significantly Norwich PRA and Riverside Retail Park.

- 7.2. Overall, any negative retail or leisure impact that would result from the proposed development would be significantly outweighed by the retail and leisure benefits from the development coming forward.
  
- 7.3. In light of the sequential test and impact assessment having been satisfied the proposed development is considered to be acceptable in this case and is fully compliant with the relevant national and local planning policy and guidance.



## 8. Appendices

### **Appendix 1 – Correspondence with Norwich City Council**

**From:** Hinchcliffe, Sarah <SarahHinchcliffe@norwich.gov.uk>  
**Sent:** 30 May 2022 12:49  
**To:** mark@maplanning.co.uk  
**Subject:** RE: Proposed development at Carrow Works - Retail Impact Assessment requirements

Dear Mark,

Due to the fact that the application is intended to be submitted in hybrid form with development across large areas of the site to form part of the outline part of the submission there is some uncertainty from the local planning authorities perspective as to what the mix of commercial uses which could come forward on the site may look like and at what scale in terms of the amount of floor space. Therefore my comments on the matter of retail and leisure impacts and sequential site suitability are quite general in this respect.

Current development plan policy is clear that proposals for 'main town centre uses' that are not within a defined centre (as is the case here) need to be justified by a sequential site assessment and impact assessment (if more than 1000sqm gross internal area is proposed).

My assumptions are that there are two areas of the site which will contain commercial/town centre type uses such as retail and leisure uses. One being along the main east west route through the site, including the area around the mustard seed driers which may contain commercial uses at ground floor level within new build blocks and existing buildings to be retained. For the purpose of the sequential assessment it could be reasonable to aggregate the floorspace associated with these uses together if putting forward an argument that the coexistence of the mix of uses is required to make the proposals along the east west route work. A second area is a location towards the south of the site near the main entrance to the site from the roundabout on Bracondale, which may contain a larger format retail element/food store. The floor space proposed in this part of the site should be considered separately from any commercial floor space elsewhere on the site.

Under the impact assessment you should examine all existing and planned retail and leisure floor space within all existing allocated Local and District Centres within a reasonable walk time of the application site to test the predicted impact of the new provision on existing trading patterns on appropriately located retail development. For the development proposals on the adjacent Deal Ground site it appears to have been agreed at the time that an 800 metre isochrone (800m from all the site boundaries) would be appropriate and that would seem a reasonable starting point given that this is recognised to be the distance which people tend to walk to a destination. As this brings you to the edge of the city centre retail area, and also as the site is being promoted as one which is sustainable and accessible to the city centre then I would also suggest that impacts on the city centre also needs to come into your assessment.

I therefore suggest that you will need to consider the impact on the city centre retail area and the large district centre at Riverside Retail Park and the local and district centres on the south side of the city including;

- LC01 Hall Road/ Trafalgar Street
- LC02 Hall Road/Queens Road
- LC03 Hall Road/Southwell Road
- DC09 Hall Road Retail Park and Hall Road/Sandy Lane
- Due to concerns raised by local residents of Trowse about impacts of development on the adjacent Deal Ground site it would be beneficial to consider impacts on any local retail provision which exists within Trowse village? I am not sure however whether any local provision still exists within the village, but it would be helpful to investigate this and deal with this matter if necessary.

The above suggestions are made, unless you are able to justify within your submission why consideration of these locations is not considered appropriate.

Regards

**Sarah Hinchcliffe Bsc MA MRTPI**  
**Senior Planner**  
Development and City Services  
**Norwich City Council**

01603 989413

My working days are Monday – Friday

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**From:** mark@maplanning.co.uk <mark@maplanning.co.uk>  
**Sent:** 25 May 2022 19:09  
**To:** Hinchcliffe, Sarah <SarahHinchcliffe@norwich.gov.uk>  
**Subject:** RE: Proposed development at Carrow Works - Retail Impact Assessment requirements

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Thank you Sarah,

Please do let me know if you have any queries in the meantime. I look forward to hearing from you.

Best regards,

**Mark Alexander Balaj**  
*BSc (Hons) MSc MRTPI Chartered Planning Consultant*



telephone: **07311 038 660**  
email: [mark@maplanning.co.uk](mailto:mark@maplanning.co.uk)  
website: <http://retail.maplanning.co.uk/>

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**From:** Hinchcliffe, Sarah <[SarahHinchcliffe@norwich.gov.uk](mailto:SarahHinchcliffe@norwich.gov.uk)>  
**Sent:** 25 May 2022 12:24  
**To:** [mark@maplanning.co.uk](mailto:mark@maplanning.co.uk)  
**Subject:** FW: Proposed development at Carrow Works - Retail Impact Assessment requirements

Hi Mark,

I have been involved in pre-application discussions with the project team for this site. I will come back to you in response to your queries by the end of the week or at the latest the beginning of next week.

Regards

**Sarah Hinchcliffe Bsc MA MRTPI**  
**Senior Planner**  
Development and City Services  
**Norwich City Council**

01603 989413

My working days are Monday – Friday

Using Microsoft Teams? Click [here](#) to contact me on Microsoft Teams



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**From:** PLANNING <[planning@norwich.gov.uk](mailto:planning@norwich.gov.uk)>  
**Sent:** 25 May 2022 10:53  
**To:** Hinchcliffe, Sarah <[SarahHinchcliffe@norwich.gov.uk](mailto:SarahHinchcliffe@norwich.gov.uk)>  
**Subject:** FW: Proposed development at Carrow Works - Retail Impact Assessment requirements

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**From:** [mark@maplanning.co.uk](mailto:mark@maplanning.co.uk) <[mark@maplanning.co.uk](mailto:mark@maplanning.co.uk)>  
**Sent:** 22 May 2022 16:57  
**To:** PLANNING <[planning@norwich.gov.uk](mailto:planning@norwich.gov.uk)>  
**Cc:** [contact@maplanning.co.uk](mailto:contact@maplanning.co.uk)  
**Subject:** Proposed development at Carrow Works - Retail Impact Assessment requirements

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To whom it may concern,

I am writing in relation to a proposal for a residential-led development with supporting non-residential mixed-uses (incl. Class E/F1) on a 17ha site at Carrow Works, Kings Street. My client aims to submit a planning application in support of the proposed development towards the end of next month. We have been instructed by our client to prepare a Retail Impact Assessment which will form part of the suite of documents accompanying the planning application.

The planning application would be in hybrid form with all proposed highway arrangements to be submitted with full details, whilst the remainder of the application to be submitted in outline form. At this stage, inter alia, it is expected that the proposal would comprise of 10,119 sqm of retail floorspace (incl. food store, food hall, café, bar and local retail), 12,152 sqm of office floorspace (incl. ancillary café and retail).

Paragraph 90 of the NPPF states that a retail impact assessment will be required for retail and leisure developments outside town centres which are not in accordance with an up-to-date plan and are above 2,500 sqm. Local Plan Policy DM18 goes further by setting out lower thresholds where a retail impact assessment is required as part of the development proposal, unless, among other things, the principle of development at a larger scale has already been accepted through an allocation.

The site itself is not within a defined centre and is not allocated within the current Sites allocations plan, however, it is included as an allocation within the emerging Greater Norwich Local Plan (ref GNLPO360/3053/R10). It is expected that the proposal will be delivered in stages, with access arrangements being the first phase and full completion of the scheme expected in approximately 10 years.

The NPPG states that *'applicants and local planning authorities should seek to agree the scope, key impacts for assessment, and level of detail required in advance of applications being submitted'*. Paragraph: 017 Reference ID: 2b-017-20190722

Therefore, I would appreciate it if you can confirm the level of information that the Council would require to be included within the retail impact assessment considering the early stage of the scheme with the retail elements being in outline format.

Among other things, I would appreciate clarification on the following points:

- The extent of the assessment's area
- Hierarchy of centres that will need to be assessed;
- Which of the hierarchy thresholds referenced in Appendix 4 of the Local Plan would be applicable?;
- Whether disaggregation of the proposed development would be acceptable for the purposes of undertaking the impact assessment; and
- Any other retail-based requirements that you consider essential as part of the retail impact assessment.

I look forward to hearing from you and, should you have any queries, please get in touch and I will be happy to assist.

Best regards,

**Mark Alexander Balaj**

*BSc (Hons) MSc MRTPI Chartered Planning Consultant*





telephone: 07311 038 660

email: [mark@maplanning.co.uk](mailto:mark@maplanning.co.uk)

website: <http://retail.maplanning.co.uk/>

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## Appendix 2

# Policy 7.1

## East Norwich

333

East Norwich, which consists of brownfield regeneration sites by the rivers Wensum and Yare at Carrow Works, the Deal Ground and the Utilities Site, and land in front of ATB Laurence Scott fronting the Wensum, is defined in map 9 below. It has the potential in the medium to long-term to create a new mixed use sustainable urban quarter for Norwich and to contribute significantly to growth of the Greater Norwich economy. It also has the potential to act as a long-term catalyst for regeneration of the wider area. As a result, East Norwich is identified as a strategic regeneration area on the Key Diagram.

334

To ensure growth is co-ordinated, overcomes local constraints and is well-designed in a sensitive location in and adjacent to the Broads Authority area, the strategic policy requires regeneration to be guided by an area-wide Supplementary Planning Document (SPD). Funding for the SPD has been provided from the site landowners and other partners in the East Norwich Partnership (a new public-private sector partnership led by Norwich City Council) including Homes England and Network Rail. Significant additional funding was also secured from the Towns Fund which has enabled the SPD to progress and also enabled the Council to acquire land in order to become a landowning partner. The SPD will inform implementation of this strategy and, alongside an Infrastructure Delivery Plan (IDP) and phasing plans, will establish a framework for assisting with unlocking the development opportunities and a framework for securing funding for the delivery of infrastructure, where needed, such as bridges and marinas. Whilst the SPD, IDP and phasing plans will form the framework for bringing forward development at East Norwich, further in depth assessments and studies will need to be undertaken in order to inform the decision making process at the planning application stage. This will include (but not be limited to) a Transport Assessment, a Sustainability Statement, Heritage Impact Assessment, Archaeological Evaluation,

Energy, Water and Construction Statements, Flood Risk Assessment, Landscape and Design Statement, Ecological Assessment, Arboricultural Assessment, Contamination Investigations and Noise and Air quality Assessments.

335

The SPD will promote development of a locally distinctive, high density and high quality sustainable residential-led mixed-use community, co-ordinate delivery of new transport and connectivity infrastructure, social infrastructure, jobs and services, protect and enhance biodiversity and green infrastructure , set the objectives for implementation of a low carbon energy solution for the site (potentially including a local energy network to serve the area as a whole), conserve, and where opportunities arise, enhance heritage assets and address local issues including the active railway, the protected minerals railhead, noise and flood risk issues. The masterplanning work indicates a residential development capacity for the entire East Norwich Strategic Regeneration Area of approximately 3,633 homes. This includes 271 homes within the Broads Authority area which will be delivered through the Local Plan for the Broads. Therefore in the region of 3,362 homes should be delivered on sites within the Greater Norwich Local Plan area. In terms of job numbers the findings of the masterplanning work indicates that opportunities should be created for at least 4,100 jobs (full time equivalents).

336

Policy 7.1 provides the strategic policy framework and site allocation policy GNLPO360/3053/R10 sets out the key development considerations and constraints along with the site wide and site specific requirements.

#### **Policy 7.1 East Norwich (Extract)**

**Development of sites allocated in the East Norwich Strategic Regeneration Area (ENSRA) identified on the Key Diagram and defined on map 9 including Carrow Works (which includes Carrow House), the Deal Ground (including the former May Gurney site), the Utilities Site and Land in front of ATB Laurence**

**Scott will create a highly sustainable mixed-use quarter accommodating substantial housing growth and optimising economic benefits. Development across the sites will provide in the region of 3,362 homes in the plan period and significant new employment opportunities for at least 4,100 jobs.**

**Redevelopment of the East Norwich Strategic Regeneration Area (ENSRA) will be guided by an area-wide Supplementary Planning Document (SPD). The SPD will promote development of a locally distinctive, high density and high quality sustainable residential-led mixed-use community which takes full account of its setting and makes the most of its riverside location.**

**The SPD will provide the framework for seeking new transport infrastructure (through integrated access and transportation) which emphasises sustainable accessibility and traffic restraint and allows for connectivity and permeability within and between the sites and beyond), social infrastructure, jobs and services.**

**Development must also protect and enhance biodiversity and green infrastructure; provide for sustainable energy provision and its management; conserve, and where opportunities arise, enhance heritage assets; and address local issues including the active railway, the protected minerals railhead, noise, contamination and flood risk issues.**

**Whilst site proposals within the East Norwich Strategic Regeneration Area (ENSRA) may come forward on different timescales, it is important that development is undertaken in accordance with the SPD and must meet the site wide and site specific requirements set out within site allocations policy GNLP0360/3053/R10.**



## **Part 2 – The Sites**

### **East Norwich**

2.6

The East Norwich Strategic Regeneration Area (ENSRA) consists of three brownfield regeneration sites adjacent to the rivers Wensum and Yare. These are Carrow Works (including Carrow House), the Deal Ground (including the May Gurney site) and the Utilities Site. The ENSRA also includes land in front of ATB Laurence Scott fronting the Wensum, which is considered essential for the delivery of sustainable transport links to the three sites and potentially for emergency access. The overall area is defined on map 9 of the Greater Norwich Local Plan and the three regeneration sites, (plus land in front of ATB Laurence Scott) are identified as a strategic regeneration area under policy 7.1 and allocated under this site allocations policy. This site allocations policy should be read in conjunction with policy 7.1.

2.7

2.9

The Deal Ground and Utilities site are allocated in the adopted Norwich Site Allocation and Site-Specific Policies Plan (2014); however the release of the Carrow Works site for development presents the opportunity to strategically address the challenges and opportunities of all three sites. Unlocking the full development potential of the sites relies upon addressing constraints and, in particular, requires the provision of common infrastructure to serve all the sites, which will enable sustainable growth to be delivered in this location. This should achieve improved integration of the ENSRA sites in terms of social, economic and green infrastructure. There is also the potential for a new pedestrian/cycle access route connecting the Deal Ground to the Carrow Works site via an existing underpass under the rail line. This route should be further enhanced as part of the development proposals on both sites, and in conjunction with any future rail upgrade works and the potential replacement of

Trowse Swing Bridge. Viability and deliverability are key considerations in the delivery of the regeneration project and individual proposals capable of being delivered will not be allowed to prejudice the comprehensive sustainable development of the east Norwich area as a whole. Development will need to provide the key infrastructure identified within the SPD and all key infrastructure must be delivered in accordance with any delivery plans and phasing plans agreed through the SPD. Further infrastructure may be required beyond that which is identified in the SPD. This infrastructure along with its phasing will need to be agreed through the planning applications process.

## 2.10

Key development considerations and constraints across the East Norwich Strategy Regeneration Area are:

- i. There is a need for substantial new transport infrastructure to provide connectivity and permeability within and between the sites in the East Norwich Strategic Regeneration Area and beyond, including north-south links between Trowse and the north bank of the Wensum and Thorpe Road/Yarmouth Road, and east-west links between the city centre, the railway station and Whitlingham Country Park and the Broads including an extended riverside walk on the north and south banks of the Wensum. The ENSRA SPD will include an approach to integrated access and transportation which will identify key new routes, river crossings and network improvements; however details of on and off site infrastructure and its phasing will need to be informed by a Transport Assessment and in consultation with the Highway Authority. It is anticipated that this will include, but not be limited to, the requirement for a new all-modes access from Bracondale to the Deal Ground via a bridge over the River Yare, and a new all-modes bridge over the River Wensum to provide access to the Utilities site, and cycle and pedestrian links along the river corridor linking the city, via Carrow Works to the Broads. Any new bridge or bridges must be designed to meet navigation requirements for the River Wensum and will need to be considered alongside requirements for river and/or other marina moorings and de-masting facilities. The integrated access and transportation approach must have an emphasis on sustainable accessibility and traffic restraint.

- ii. There is a need to manage the transport impact of the development on the strategic and local highway network. A low car environment will be promoted, supported by an excellent walking and cycling network and access to public transport.
- iii. Development will be required to provide area-wide environmental, economic and social infrastructure and services in a co-ordinated manner in order to support the level of growth proposed.
- iv. There will be a need for development to address and mitigate potential environmental impacts from adjacent uses and activities and ensure that new development will not compromise their continued operation. Relevant issues include the impact of the railway, the Crown Point Train Maintenance Depot, the aggregate depot minerals operations and the sewage treatment works.
- v. Prior to development there will be a need to address and remediate site contamination and remove redundant utilities infrastructure from previous industrial uses.
- vi. Development must protect and enhance key areas of landscape and biodiversity value, green infrastructure assets, corridors and open spaces within the area, including enhancing linkages from the city centre to the Broads, Whitlingham Country Park, Carrow Abbey County Wildlife Site, the wider rural area and elsewhere in Norwich. Development must demonstrate the means to retain, maintain and manage these assets in perpetuity.
- vii. Parts of the East Norwich Strategic Regeneration Area are situated within Trowse Millgate Conservation Area and Bracondale Conservation Area and there is a high concentration of heritage assets in and adjacent to the sites. Development must have regard to the character and appearance of the conservation areas and conserve, and where opportunities arise, enhance the sites' heritage assets and their settings including long views from, into and across the sites. Development must be of appropriate scale, form and massing, informed through the coordinated masterplanning process. There is also potentially significant archaeological interest from early settlement around the confluence of the Rivers Wensum and Yare which will require further site investigation prior to development.
- viii. Development will need to be of a high-quality exemplar, energy efficient design which builds at appropriate densities as indicated in the SPD, and maximises the riverside regeneration

potential whilst acknowledging the sensitive location at the confluence of two rivers forming the eastern approach to Norwich. The design and form of development must acknowledge the proximity of Whitlingham Country Park, and the village of Trowse, take account of its setting adjacent to the Broads and manage the potential impact on long views toward and away from the urban edge.

- ix. The East Norwich Strategic Regeneration Area falls within flood zones 1, 2 and 3 and therefore site-specific flood risk assessments must be undertaken prior to development in order to identify risks from river and surface water flooding. Development will need to be flood resilient and provide appropriate flood mitigation measures. Parts of the sites are within the flood plain of the River Yare and any development on the floodplain would compromise the natural functioning of the river and the Water Framework Directive no deterioration objective. There should therefore be a significant buffer between the development and the flood plain. Any sensitive development of sections of this land parcel outside of the flood plain should also restore natural habitats within the flood plain.
- x. Development should make appropriate provision for sustainable drainage. SuDS within the development must be sufficient to protect the water quality of the River Wensum and River Yare and any opportunities to improve riparian habitat to mitigate against the impacts of the development would help to secure improvements necessary to meet good Water Framework Directive status and help ensure that the development does not cause any deterioration.
- xi. Development should address the Broads Authority's navigational requirements given that the River Wensum (up to New Mills) forms part of the Broads network. Consideration should be given to allowing greater use of the Rivers Wensum and Yare for water-based recreation, leisure and tourism including the potential inclusion of marinas and riverside moorings and access for waterborne freight subject to not impeding navigation of either river. It also forms a significant corridor for wildlife.
- xii. A management company/companies shall be set up for the East Norwich Strategic Regeneration Area. Responsibilities of the management company/companies (some of which will require specialist management) will include (but not be limited to) providing a contribution towards the running cost of Whitlingham Country Park (in order to compensate for increased visitor pressure/usage of Whitlingham Country Park),

safeguarding nationally important heritage assets on site, the management and maintenance of open spaces and gardens, and the management of pedestrian and cycling routes and roads as appropriate.

- xiii. Norfolk Minerals and Waste Core Strategy Policy CS16 and the NPPF 'agent of change' principle applies, as parts of the sites are within the consultation area of a safeguarded mineral infrastructure (aggregate and roadstone railhead and asphalt plant).

## **Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk**

### 2.11

The Deal Ground comprises an extensive area of disused former industrial land and buildings on the south-eastern fringe of Norwich situated between the main Norwich to London and Cambridge rail lines and the confluence of the rivers Wensum and Yare. The majority of the site has been tipped to raise its level: the lower lying eastern edge of the site adjoining the River Yare (including Carrow Abbey Marsh) falls within the river valley and is largely rural in character. Carrow Abbey Marsh is a County Wildlife site and will need to be managed to preserve and enhance its biodiversity and ecology.

### 2.12

Adjoining the site to the west is an operational minerals railhead and asphalt plant, situated alongside the railway. This railhead site is safeguarded under policy CS16 in the adopted Minerals and Waste Core Strategy. The railhead currently receives the majority of crushed rock delivered for Norfolk. It benefits from deemed consent and is not subject to any restrictions to operating hours, noise limits etc. The asphalt plant has the benefit of permanent planning permission



(ref C/4/2010/4003), which contains conditions regarding noise limits, operational hours etc.

## 2.13

Development of this site needs to respect and enhance the setting of the designated heritage assets within and adjoining the site: including the grade II listed brick “bottle kiln” in the north part which is in a poor state of repair and on Norwich’s Buildings’ at Risk Register and the late C19 engine house at Trowse Sewage Pumping Station within Trowse Millgate Conservation Area to the south.

## 2.14

The majority of the site lies in Flood Zones 2 and 3, both now and with the addition of climate change. A significant majority of Flood Zone 3 is shown on Environment Agency modelling to actually be Flood Zone 3b Functional Floodplain, with an annual probability of flooding of 5% (1 in 20) and classed as ‘land where water needs to flow and be stored in times of flood’. Residential and commercial development, classed as ‘more vulnerable’ and ‘less vulnerable’ development respectively, is not permitted in Flood Zone 3b. The developable area will be informed by level 2 Strategic Flood Risk Assessment. As with all development in Flood Zones, the more vulnerable development, and ideally the less vulnerable development too, will need to be designed with floor levels raised 0.3m above the flood levels for the future 1% (1 in 100) annual probability flood event with 35% and ideally 65% allowances for climate change. Refuge will also need to be provided above the 0.1% (1 in 1000) annual probability 25% climate change flood levels. Compensatory flood storage will also need to be provided for any built development or land raising within the 1% (1 in 100) annual probability flood outline with 35% climate change to ensure no increase in flood risk elsewhere. This will require lowering of higher land in Flood Zone 1 to provide the compensatory flood storage. It is noted that extant outline permission 12/00875/O on the site met these requirements, although climate change allowances have since changed so the required floor levels may be different.

## 2.15

A significant proportion of the site falling within the city of Norwich area is allocated in the adopted 'Site allocations and site-specific policies' plan and the major part of it also benefits from outline permission for residential led mixed-use development, although this has not yet been progressed. This is a cross boundary allocation as part of this site also falls within South Norfolk jurisdiction (this is a single policy covering the cross-boundary site). As an existing allocation this site is included in the housing commitment figure and has been considered in the calculation of the housing requirement.

New paragraph - It is anticipated that the Deal Ground/May Gurney site will deliver in the region of 1,257 homes (with approximately 1,099 on the Deal Ground site and 158 on the May Gurney site).

## **Land at Carrow Works (including Carrow House)**

2.16

Carrow Works was formerly the location for Britvic Soft Drinks Ltd. and Unilever UK Ltd., and the site also includes Carrow House owned by Norwich City Council. The properties that make up Carrow House, including the Conservatory and car park are being promoted for redevelopment.

2.17

The site is known for the presence of the remains of Carrow Priory and as the former family home of the Martineau and later the Colman families. The manufacture on the site grew from the Colman's family business, which included the milling of mustard seed to produce the international brand of Colman's Mustard. Corona fizzy drink was produced from the site and later Britvic and Unilever took over manufacturing here. The site also includes a conference centre (within the Carrow Abbey former residential property), former coroner's court and social services department offices (within Carrow House), a fire station and disused Trowse Railway Station.

2.18

There is a high concentration of both heritage and natural assets within the site. There are further assets within close proximity of the site (including the Broads), which may also impact on the proposals. Designated heritage assets include scheduled monuments, listed buildings, and conservation areas; non-designated heritage assets include locally registered parks and gardens, locally listed buildings and the area of main archaeological interest, and items as yet unidentified.

## 2.19

The land and buildings around Carrow Abbey comprise a scheduled monument (Carrow Priory) and contains listed buildings (grade I), there are individual and group TPOs, and the land is a locally registered historic park and garden. The historic park and garden extends for some distance to King Street and Bracondale and includes Carrow House and Gardens, which is also listed (grade II). The conservatory at Carrow House is grade II\* listed. The other grade II listed buildings and structures on the site are Blocks 7,7a, 8 and 8A, block 92, Eastern air raid shelter, steps and paved surfaces of sunken garden near Carrow Abbey, flint wall and 19 attached pet tombs, the lodge, gardener's cottage and former car shed to Carrow Abbey, the former mustard seed drying shed, K6 telephone kiosk outside the entrance of the former mustard seed drying shed, and the Trowse railway station.

## 2.20

There are a number of locally listed buildings both on site and immediately beyond it. Further research regarding the buildings and structures on site may reveal further assets of heritage significance. Part of the site is contained within the Bracondale Conservation Area and part of the site is contained within the Trowse Millgate Conservation Area.

## 2.21

The site is situated within the Area of Main Archaeological Interest; this area offers potential to reveal more about the history of the early City. It is likely that the archaeological potential across the whole site

will be of interest. Archaeological investigation below any areas of construction or altering of the ground will likely be required to assist in the understanding of the City's history.

## 2.22

There are further group and area TPO trees within the site, including a group to the rear of the fire station and a group running parallel with the railway line

## 2.23

To the east of the site (within the Deal Ground) lies a County Wildlife Site. Therefore the trees and green spaces on the Carrow Works site together with a number of buildings are likely to be important for wildlife and biodiversity. Protection of the wildlife and increasing biodiversity of the site will be required.

## 2.24

The vast majority of the site is Flood Zone 1. There is a very small area to the north east of the site, adjacent to the river which is Flood Zone 3. Therefore, the sequential approach must be applied to avoid built development within this small area of flood zone to allow it to continue to provide flood storage.

New paragraph - It is anticipated that the Carrow Works/Carrow House site will deliver in the region of 1,692 homes.

## **Utilities site**

New paragraph: The Utilities site is the home of a former power station and still contains a number of underground and overground utilities including an electricity substation.

## 2.25

The site was allocated in the previous Local Plan for major mixed use redevelopment (to include residential, employment and power generation from renewable sources) but has not yet been developed. Previous proposals were founded on the expectation of delivering a renewable power generation facility as an integral part of the development and although this option is not being actively pursued there is scope for local energy generation serving the wider area.

2.26

The principle of development on the site has already been accepted and it is expected that development will take place within the time-period of this Local Plan.

2.27

Whilst the majority of the Utilities site falls within the Norwich City Council administrative area, some falls within the Broads Authority Executive Area for planning purposes: the land immediately to the east of site R10 between the River Yare and the railway line falls within the planning jurisdiction of the Broads Authority. Policy NOR1 of the adopted Broads Local Plan 2019 (or successor document) provides for mixed use development of this adjoining land potentially providing up to 120 homes in addition to the housing potential of the site allocated within this plan. The East Norwich SPD indicates that around 271 homes can be delivered within the Broads Authority Area. Development proposals will need to incorporate both areas and are required to comply with the site-specific policies of both local planning authorities.

New paragraph - It is anticipated that the Utilities Site will deliver in the region of 684 homes (with approximately 413 homes being within the GNLP area and 271 homes falling within the area covered by the Broads Local Plan).

## **Strategic Allocation**

### **Strategic Allocation**

**Policy GNLP0360/3053/R10: East Norwich Strategic Regeneration Area (ENSRA) incorporating:**

- a. Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (approx. 21.35 ha)**
- b. Land at Carrow Works, Norwich (approx. 19.91 ha)**
- c. Utilities Site, Norwich (approx. 6.92 ha)**
- d. Land in front of ATB Laurence Scott (0.39 ha)**

**Development across the East Norwich Strategic Regeneration Area will achieve the following site wide requirements:**

- 1. Development must be undertaken comprehensively in accordance with the SPD for the East Norwich Strategic Regeneration Area required by policy 7.1 (including in accordance with any phasing plans). Proposals should not prejudice future development of or restrict options for the other sites within the East Norwich Strategic Regeneration Area.**
- 2. Development must be carried out in accordance with the movement and connectivity framework set out within the SPD. Proposals must enable connectivity and permeability within and between the sites in the strategic regeneration area and beyond. Proposals should be designed for ease of access to, and by, public transport, with appropriate bridge provision to ensure the sites are fully permeable by sustainable transport modes. Development must manage and mitigate the travel impacts of the sites on the transport network and be informed by a comprehensive Transport Assessment at the planning application stage which considers the whole of the strategic allocation.**
- 3. Development must create an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing need along with opportunities to access high quality jobs and services.**
- 4. Co-ordinated delivery of new social infrastructure (e.g. a new primary school, local centre, health facilities and recreational spaces including public open spaces and child play spaces) and economic infrastructure (e.g. transport routes, bridges and utilities) and services, as informed by the SPD.**
- 5. Make the most of its riverside location, including provision of a riverside walk along the northern and southern banks of**



**the River Wensum, linking the sites and providing connections to Norwich City Football Club and the city centre as well as the establishment of a recreational route to Whitlingham County Park suitable for accommodating National Cycle Route 1 (NCR1). This will be designed to allow future extension of the pedestrian and cycle network to serve other surrounding regeneration opportunity sites east of the city centre should they become available, including improved access routes to Kerrison Road and Hardy Road over or under the railway line north of Trowse Swing Bridge and south of the river between the Deal Ground and Carrow Works;**

- 6. Achievement of an exemplar high quality, high density, locally distinctive design of a scale and form which respects its context and setting and makes the most of its riverside setting. Proposals must establish strong built frontages along the River Wensum and the defining network of streets and spaces with the sites. Design should also take account of the significance of heritage assets on and off site and protected trees as informed by the SPD.**
- 7. There will be the general presumption in favour of the repair and re-use of heritage assets on site as part of any redevelopment proposals, however any application will be considered on its merit. Great weight will be given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designated heritage assets affected by the proposal on and off site including key views from and into the site. Development proposals should draw upon local character and distinctiveness and conserve, or where opportunities arise, enhance the character and appearance of the conservation areas affected, Scheduled monuments, listed building, locally listed buildings and other non designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting). Development proposals should also consider heritage assets below ground and the impact upon the Broads.**
- 8. Proposals will maintain the open character of the Yare Valley and preserve long views towards the Broads and open countryside**
- 9. Development proposals will include protection and enhancement of the existing biodiversity of the site including green infrastructure assets, corridors, trees and open spaces. Development must enhance linkages from the**

city centre to the Broads, Carrow Abbey County Wildlife Site, the woodlands, the wider rural area and elsewhere in Norwich.. Development must also achieve high quality landscaping, planting and biodiversity enhancements, including enhancements to the River Wensum and River Yare and to the locally registered historic park and garden, along with appropriate improved public access.

10. Be designed to mitigate the impact of vibration, noise generation, light and air pollution from adjacent industrial operations, roads and railways in order to protect the amenity of users and occupiers of the sites.
11. Proposals for development must ensure that they will not place constraints on the operation of the safeguarded asphalt and aggregates transshipment operation and associated rail facility.
12. Development proposals must address and remediate site contamination
13. An archaeological assessment will be required prior to development
14. Site specific flood risk assessment must be undertaken prior to development and the design of the development will need to be flood resilient and incorporate appropriate mitigation measures in order to address flood risk from both river and surface water flooding.
15. Development must allow scope for greater use of the Rivers Wensum and Yare for water-based recreation, leisure and tourism including the potential inclusion of marinas and riverside moorings.

#### **Deal Ground/ May Gurney**

**Development must also achieve the following site-specific requirements:**

17. Preserve the integrity and wooded landscape character and biodiversity interest of the eastern margin of the Deal Ground around Carrow Abbey Marsh and Whitlingham Country Park to the east.
18. Development must secure remediation and long term management of the Carrow Abbey County Wildlife site (on and adjacent to this site).

**19. Proposals will include the conservation of the grade II listed 'bottle kiln' and its setting in the north part of the site and Trowse Pumping Station within Trowse Millgate Conservation Area to the south. Imaginative restoration and re-use of the bottle kiln in a manner that maintains its special interest will be supported and a management plan demonstrating how the asset will be maintained in the future will be required. Proposals should also acknowledge the heritage significance of the site adjacent to Carrow Works.**

**20. Deliver the following key infrastructure, in accordance with phasing plans and trigger points to be set out in the SPD:**

- a. Provision of a new/replacement junction in close proximity to the existing Bracondale entrance to the May Gurney site, details to be determined through a Transport Assessment.**
- b. Provision of a fixed all modes bridge over the River Yare connecting the May Gurney site to the Deal Ground site built to adoptable standards.**
- c. Provision of a spine road across the Deal Ground built to adoptable standards.**
- d. Provision of a high quality east-west pedestrian/cycle route to connect the railway underpass to Whitlingham Bridge and to the city centre, and facilitate enhancement works to the underpass.**
- e. Provision for a fixed pedestrian/cycle bridge over the River Yare to Whitlingham Country Park.**
- f. Land to be safeguarded to enable the delivery of a twin track Trowse Rail Bridge.**
- g. Provision for an all modes bridge over the River Wensum to the Utilities Site and connected to the spine road.**
- h. Provision of a new high quality marina, meeting the specifications set out in the SPD.**
- i. Provide unconstrained access and services to the moorings downstream of the new Wensum Bridge.**
- j. Provision of continued access (including services), to the existing Carrow Yacht Club.**

## **Carrow Works**

**Development must also achieve the following site-specific requirements:**

- 21. Proposals will include the conservation and long term management of the scheduled monument and listed buildings on the site and provide a suitable setting for designated heritage assets affected by the proposals on and off site. Proposals, which seek to convert, alter or demolish locally listed buildings or have a harmful impact on the significance of their setting, will be considered on their merits. Clear justification for all proposals will be required;**
  
- 22. Proposals will be required to adopt and implement a strategy of heritage interpretation relating to both the heritage assets of the site, and the use(s) of the site.**
  
- 23. Deliver the following key infrastructure in accordance with phasing plans and trigger points to be set out in the SPD:**
  - a. Provision of a high quality east-west pedestrian/cycle route to connect King Street to the railway underpass, and facilitate enhancement works to the underpass.**
  - b. Provision of a pedestrian/cycle bridge over the River Wensum (linking to Carrow Road).**
  - c. Provision of key road infrastructure across the Carrow Works site (built to adoptable standards and able to accommodate public transport).**
  - d. Provision of a second point of access to King Street, the detail of which will be determined through a Transport Assessment.**
  - e. Provision of high quality pedestrian/cycle routes to both the city centre and Bracondale.**
  - f. Off site improvements to the highway network including junction enhancements and improved crossing facilities, the detail of which will be determined through a Transport Assessment.**
  - g. Safe and convenient cycle route through the Carrow Works site connecting Martineau Lane roundabout to King Street.**
  - h. Provision of serviced site for a two form entry primary school.**
  - i. Provision of land for a health facility sufficient to serve the East Norwich development as a whole.**

- j. Provision of a community retail centre to serve the development and in a location which is accessible to all future residents of the East Norwich Strategic Regeneration Area by sustainable transport means.**

## **Utilities Site**

**Development must also achieve the following site-specific requirements:**

**24. Proposals should acknowledge the heritage significance, or previous use, of the site as a former power station as part of the requirement to conserve, and where opportunities arise, enhance heritage assets and their setting.**

**25.**

**26. Effective integration with proposals for the area of the site immediately to the east falling within the Broads Authority area and covered by policy NOR1 of the adopted Broads Local Plan 2019 (or successor document).**

**27. Deliver the following key infrastructure in accordance with phasing plans and trigger points to be set out in the SPD:**

**a. Provision of a new all mode bridge over the River Wensum connecting to the Deal Ground spine road.**

**b. Provision of a new high quality marina meeting the specifications set out in the SPD.**

**c. Provision of a high quality pedestrian/cycle route along the River Wensum frontage of the Utilities site connecting to the adopted riverside walkway to the west of ATB Laurence Scott (or Hardy Road).**

**d. Provision of a secondary/emergency vehicular and pedestrian/cycle access to Hardy Road and/or Cremorne Lane.**

**e. Provision of unconstrained access and services to the moorings downstream of the new Wensum Bridge.**

**Land adj. to ATB Laurence Scott**

**28. A high quality pedestrian/cycle route along the River Wensum frontage of the ATB Laurence Scott site shall be provided which connects to the adopted riverside walkway to the west of ATB Laurence Scott (or Hardy Road), and to the riverside pedestrian/cycle route on the Utilities site.**



## Appendix 3





**Appendix 4**

Site no.	Address	Site Area (ha)	Amenities	Accessible	Brownfield	Sequential Location	Sequentially Preferable	Comments
1	Vantage House, Pottergate, Norwich	N/A	Yes	Yes	N/A	Edge-of-Centre	No	Relates to top floor of existing block of flats. Planning submitted for four penthouse flats. The site area is too small to accommodate the proposed development
2	Clarence Rd, Norwich	N/A	Yes	Yes	Yes	Edge-of-Centre	No	Property comprises existing detached former dwelling. The site is significantly smaller than the required search criteria.
3	All Saints Green, Norwich	N/A	Yes	Yes	Yes	Edge-of-Centre	No	The site is subject to a lapsed planning permission for 7 self contained flats. Clearly the site is not sufficiently large to accommodate the level of development proposed.

No.	URL
1	<a href="https://www.rightmove.co.uk/properties/107624588#/?channel=COM_BUY">https://www.rightmove.co.uk/properties/107624588#/?channel=COM_BUY</a>
2	<a href="https://www.rightmove.co.uk/properties/119748974#/?channel=COM_BUY">https://www.rightmove.co.uk/properties/119748974#/?channel=COM_BUY</a>
3	<a href="https://www.onthemarket.com/details/9142647/">https://www.onthemarket.com/details/9142647/</a>

Site no.	Address	Site Area (ha)	Amenities	Accessible	Brownfield	Sequential Location	Sequentially Preferable	Comments
4	Deal Ground, Bracondale, Norwich	16.24	Yes	Yes	Yes	Out-of-centre	No	The site is allocated in the Development Plan for a residential led development. The site is also proposed to be allocated within the emerging Local Plan. Additionally, the site is subject to outline planning permission 12/00875/O for up to 650 dwellings and currently undergoing approval of conditions.
5	Carrow works	20	Yes	Yes	Yes	Edge-of-Centre	Yes	This brownfield site is the site subject to this application.

No.	URL
4	<a href="https://ncc.maps.arcgis.com/apps/webappviewer/index.html?id=64110f1c89b340938fdc601e639d063e&amp;query=BrownfieldSites_5_0%2CAIt_Ref%2C12%2F00875%2FO">https://ncc.maps.arcgis.com/apps/webappviewer/index.html?id=64110f1c89b340938fdc601e639d063e&amp;query=BrownfieldSites_5_0%2CAIt_Ref%2C12%2F00875%2FO</a>
5	<a href="https://ncc.maps.arcgis.com/apps/webappviewer/index.html?id=64110f1c89b340938fdc601e639d063e&amp;query=BrownfieldSites_5_0%2CAIt_Ref%2CGNLP3053">https://ncc.maps.arcgis.com/apps/webappviewer/index.html?id=64110f1c89b340938fdc601e639d063e&amp;query=BrownfieldSites_5_0%2CAIt_Ref%2CGNLP3053</a>

**Appendix 5**

Norwich RPA Retail Provision Key Stores (2021 Q4)				
Department Store	Fashion Multiples	Non-fashion multiples	Food Stores	Café / Restaurant Stores
House of Fraser	Boux Avenue	3 Store	Iceland	Ask
Jarrolds	Clarks	Apple	Tesco Express	Bill's
John Lewis	Crew Clothing	Beaverbrooks	Sainsbury's	Caffe Nero
Primark	Deichmann Shoes	Body Shop		Costa
	Fat Face	Boots		Cote Restaurants
	H&M	Card Factory		Five Guys
	Hollister	Cotswold Outdoor		GBK
	Hotter Shoes	EE		Greggs
	Hugo Boss	Entertainer		KFC
	J D Sports	Ernest Jones		McDonald's
	Jo Jo Maman Bebe	Flying Tiger		Millies Cookies
	Joules	Fragrance Shop		Nando's
	Mansoon	Goldsmiths		Pizza Hut
	New Look	Holland & Barrett		Pret A Manger
	Next	Hotel Chocolat		Starbucks Coffee
	Office	Lakeland Limited		The Ivy
	River Island	Lush		Turtle Bay
	Schuh	Mountain Warehouse		Wagamama
	Seasalt	02 Phones		
	Shoe Zone	Oliver Bonas		
	Sportsdirect.com	Pandorra		
	Superdry	Perfume Shop		
	T K Maxx	Poundland		
	The White Company	Smiggle		
	White Stuff	Space NK		
	Yours	Apothecary		
	Zara	Superdrug		
		Swarovski		
		Vodafone		
		Warren James		
		Waterstones		
		WH Smith		
		Wilko		

## Appendix 6

Riverside Retail Park		
Entity	Type	Retail Type
Argos	Other high St	Comparsion
B&M Bargains	Other high St	Comparsion
Boots	Other high St	Comparsion
Card Factory	Other high St	Comparsion
Clarks	Fashion	Comparsion
Costa Coffee	F&B	Leisure
H&M	Fashion	Comparsion
Hobbycraft	Other bulky	Comparsion
Matalan	Fashion	Comparsion
Morrisons	Food	Convenience
Next	Fashion	Comparsion
Nike	Child/Sports	Comparsion
Poundland	Other high St	Comparsion
Starbucks	F&B	Leisure

## Appendix 7

Hall Road Retail Park/Sandy Lane	
Entity	Type
Aldi	Convenience
Aldiss	Furniture/shing
Home Bargains	Other High St
Homebase	DIY
Hughes	Electrical
Pets At Home	Other bulky
The Food Warehouse	Food
Shoe Makers	Public House
Specialised Concept Store	Bicycle shop
Greegs	Fast food/café
Costa	Café
Asda	Convenience
The Gym Group	



### Appedix 8

Trafalgar /Hall Road				
Entity	Type	Type retail	Comments	Location
Trafalgar Fireworks	other bulky	Comparison	In normal use	within LC01
Lakenham Creamery Limited	leisure	Leisure	In normal use	within LC01
Serenity Hair Salon	hairdressers		In normal use	within LC01
Green's Convenience Store	convenienv store	Temporarily closed	Temporarily closed	within LC01
Three Sisters Vetenary Group	non-MTCU		In normal use	edge of centre
Boots Pharmacy	pharmacy	Comparison	In normal use	edge of centre
Dental Practice	non-MTCU		In normal use	edge of centre
Betfred	non-MTCU		In normal use	within LC01
Jasiek Convenience Store	convenienv store	Convenience Store	In normal use	within LC01
The Café NR1	café	Vacant	Vacant	within LC01
Brigg Street	Fashion	Comparison	In normal use	within LC01

**Appendix 9**

Queen Street/Hall Road				
Entity	Type	Type retail	Comments	Location
Earth Wood & Stone	Furniture	Comparison		edge of centre
No. 8 Kensington Place			Vacant	within LC02
City Road Therapy Centre	Health/Fitness			within LC02
The Rose	Public House	Leisure		within LC02
Berestreet Gates	Public House	Leisure		edge of centre
Scrivens Opticians			Vacant	edge of centre
Mumbai Kitchen	Restaurant	Leisure		within LC02
William Hill			Vacant	within LC02
223 Queens Road			Vacant	within LC02
God Scissors	Barbers			within LC02
Spice Xpress	Convenience Store In	Convenience		within LC02
USA Chicken Pizza	Takeaway			edge of centre
Lusa Café & Butchers	Butchers	Convenience		within LC02
New Lakenham Post Office	Convenience	Convenience		within LC02
Mystic River			Vacant	within LC02
209 Queens Road			Vacant	within LC02
Free House			Vacant	within LC02
Beau	Hairdressers			edge of centre
Roti Bangladesho	Restaurant	Leisure		edge of centre
Lifestyle Chiropractic	Health/Fitness			within LC02
Boss Barbers	Barbers			within LC02
European Foods Mini Market	Convenience Store	Convenience		within LC02
Golden Fish Bar	Takeaway			within LC02
Complete Property Estates	Office			within LC02
The Dragon	Takeaway			within LC02
Norfolk Beds	Other bulky	Comparison		within LC02
Hall Road Landry	Non-MTCU			within LC02
The Kings Arms	Public House	Leisure		within LC02
The Freemasons Arms	Public House	Leisure		within LC02
Goodbye Horses Tadoo	Non-MTCU			within LC02
Sainsburys Petrol Station	Non-MTCU			edge of entre
Namaste Village	Restaurant	Leisure		edge of centre

## Appendix 10

Hall Road Retail Park/Sandy Lane	
Entity	Type
Aldi	Convenience
Aldiss	Furniture/shing
Home Bargains	Other High St
Homebase	DIY
Hughes	Electrical
Pets At Home	Other bulky
The Food Warehouse	Food
Shoe Makers	Public House
Specialised Concept Store	Bicycle shop
Greegs	Fast food/café
Costa	Café
Asda	Convenience
The Gym Group	

## Appendix 11

Trowse Village		
Entity	Type	Type Retail
The White Horse	Public House	Leisure
Kofra Coffee Roasters	Café	Leisure
Crown Point Tavern	Public House	Leisure

### Appendix 12 - Population Forecast

Population in year:	2020	2025	2030	2038	change 2020-2038
Proposed development	0	0	2,592	4,452	4,452
Zone 1	85,033	88,177	91,268	95,493	7,316
Zone 2	62,074	63,671	65,425	68,049	4,378
Zone 3	44,420	45,503	46,509	47,993	2,490
Zone 4	50,075	51,599	52,955	54,816	3,217
Zone 5	41,666	43,670	45,187	47,205	3,535
Zone 6	49,377	52,048	54,316	57,352	5,304
Zone 7	42,653	44,388	46,123	48,450	4,062
Zone 8	21,315	21,969	22,498	23,175	1,206
Zone 12	8,695	9,150	9,439	9,818	668
Zone 13	53,095	55,038	56,762	58,815	3,777
Urban Norwich	191,527	197,351	203,202	211,535	14,184
Greater Norwich	458,403	475,213	490,482	511,166	35,953