

Our ref: J029318

:

Greater Norwich Development Partnership  
Greater Norwich Growth Board  
County Hall  
Martineau Lane  
Norwich  
NR1 2DG

22<sup>nd</sup> March 2018

Dear Sir/Madam,

**Greater Norwich Local Plan (GNLP) – Growth Options and Site Proposals (Reg 18 Consultation)**

On behalf of our clients, InfraRed UK Nominee 3 Ltd and InfraRed UK Nominee 4 Ltd (InfraRed), the owners of Castle Mall, we enclose representations to the above documents.

It is noted that the Growth Options will seek to inform the direction of the forthcoming Greater Norwich Local Plan (GNLP), which is to be developed by all the constituent districts in order to support economic growth across the area and plan for the infrastructure required.

The Site Proposals will allocate land for a range of uses to support this infrastructure. The sites that have been included within this document, thus far, are those put forward by interested parties and their agents. It is noted that no decisions have been made about which sites should or should not be included in the emerging plan.

**Background**

Castle Mall Shopping Centre forms a key part of the retail and leisure offer in Norwich City Centre. InfraRed purchased Castle Mall in July 2012, and have since brought forward a number of initiatives to improve the shopping centre. Relevant planning applications include:

- **17/01701/U** - Change of use of part of second and third floors to leisure (Class D2) (Approved: 15/12/2017)
- **15/01235/F** - Installation of new glazed shopfront (Approved: 15/10/2015)
- **15/00545/F** - Extensions and alterations to entrances at Timberhill and Farmers Avenue and associated alterations to public realm and signage (Approved: 26/06/2015)
- **14/01692/U** - Change of use of external areas adjacent to Farmers Avenue and Timber Hill entrances to provide external seating associated with A3 uses (Approved: 12/01/2015)
- **14/00527/U** - Change of use from retail units (Class A1), restaurants (Class A3), healthcare facility (Class D1), cinema (Class D2) and mall walkway to restaurants (Class A3), mall area seating and mall walkway at Level 4 (including areas of Levels 3 and 5) (Approved: 14/07/2014)

It is noted that the Greater Norwich Local Plan will not, as explained at Paragraph 1.25 of the Growth Options, seek to amend the Development Management Policies of the constituent Local Plans except in “very specific circumstances” where “limited policy changes may be required”.

However, InfraRed considers that, with reference to town centre policies, some limited changes to Development Management policies may, in fact, be required. In justification of this we have reviewed the relevant evidence base that informs the GNLP, in this case the *Greater Norwich: Town centres and Retail Study* (October 2017) (the “Retail Study”), and the relevance for the future direction of Town Centre and retail policies.

## **Evidence Base**

In terms of the requirement for retail floorspace, the Retail Study considers that there is a need for between 11,100 and 15,000 sqm additional comparison retailing floorspace within the Greater Norwich Urban Area by 2027 (para 8.32). However, the Growth Options document notes the current over-supply of floorspace (revealed as 300sqm to 2022 in Table 8.3 of the Retail Study). Given very recent trends in retail floorspace demand, it may be necessary to revise the assumed projections at the earliest opportunity.

In terms of commercial leisure uses, the Retail Study includes a projected increase in Commercial Leisure spend of some £264.7 between 2017 and 2027, the majority of which would be accounted for by the Restaurant and Café trade (+£193.2).

In terms of the role and function of Castle Mall, the Retail Study explains that the Centre has repositioned itself in a changing national and local context.

*“The older Castle Mall (opened 1993) has repositioned itself since the opening of Intu Chapelfield, and it now acts as a complementary ‘secondary’ shopping centre, offering neither the quality anchor stores nor the range of retailers which Intu Chapelfield presently does. Footfall in the centre is noticeably lower than Intu Chapelfield, although an extension to the centre which is currently under construction, which will create a new dining quarter and a redesigned entrance into the centre from Timberhill, will hopefully enable Castle Mall to make a more positive contribution to the overall offer of the centre.”*

It is therefore clear that not only has Norwich not identified a pressing need for retail floorspace early in the Plan –Period, it also identifies a projected increase in the commercial leisure spend within the Norwich Urban Area.

This has particular implications for Castle Mall as it is identified, within the evidence base, as a “secondary centre”, particularly following the advent of Chapelfield. Conversely, the Retail Study identifies opportunities for commercial leisure, including food and drink, at Castle Mall, particularly following the redevelopment of the Centre around the Timberhill entrance.

## **Representations – Growth Options**

As provided for in the NPPF at paragraph 23, planning policies should be positive, promote competitive town centre environments and plan for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should amongst other matters, pursue policies to support their viability and vitality and promote competitive Town Centres that provide customer choice and a diverse retail offer and which reflect the individuality of Town Centres.

The retail environment is changing at a rapid rate and City and Town Centres are ever evolving. Customers are looking for a wider variety of experience and uses are merging. There are several new retail and retail related formats which do not naturally fall into any specific use class. Specifically the retail footprint in many centres is decreasing and space is being taken up with other uses including leisure and other Town Centre uses. All of these uses can add to the vitality and viability of City and Town Centres.

In Norwich it is important for the city centre, Primary Retail Area and Primary Retail Frontage to respond to these changes in a positive way. The City Centre including the prime frontages should be a destination

which offers a variety of shopping and leisure experiences which encourages increased activity to take place outside of normal shopping hours.

Non A1 uses, particularly in the leisure, food and beverage sector can make a positive contribution by supporting the City Centre as a primary economic driver for the sub-region by increasing footfall and dwell time within the Primary Retail Area which subsequently creates a vibrant and vital City Centre.

This is particularly relevant for Castle Mall, which the relevant evidence base, in the form of the Council's Retail Study, has identified as being in need of repositioning. As detailed above, the Retail Study has found that Castle Mall has diminished as a retail destination in recent years, particularly following the opening of Chapelfield. The Retail Study did, however, note opportunities for Castle Mall to develop a role in providing a complementary, commercial leisure uses, noting in particular the recent and successful redevelopment of the Timberhill entrances to this end.

The Growth Options document notes, at para 4.95 the over-supply of retail floorspace in the short-term. Despite projections showing a need for additional floorspace in the longer-term, the Growth Options accepts that such projections are "*unreliable*" in determining the need for allocations.

Growth Options has also noted the increase in the commercial leisure sector, which is principally predicated on the bar/restaurant sector (para 4.97).

The diversification of centres also assists in attracting high quality tenants which furthers economic development and encourages continued investment in the City Centre.

Therefore, the following is considered in response to the Questions 17 and 18 of the Growth Options, i.e. as follows:

- *17. What should the plan do to promote retailing in the city centre; and*
- *18. Should the focus for late night activities remain at Riverside, Prince of Wales Road and Tombland or should a more flexible approach be taken;*

In response to question 17, InfraRed believes a more flexible policy should be in the GNLP, rather than include specific threshold guidance for the Primary Frontages within the City Centre. This could seek to maintain the predominance of A1 retail within Primary Frontages but recognise that the introduction of other non-A1 uses including A3, A4 and D2 uses which can add to the vitality and viability of the City Centre.

Furthermore, given the repositioning of Castle Mall, and coupled with the challenging retail environment faced by tenants on upper floors of the Mall, we further consider that the Primary Frontages as currently defined in the adopted Development plan, should no longer extend onto the second floor of Castle Mall. This revision would reflect the change in character of the upper floors, and enable the operators of the Mall as has been seen through recent planning applications, to re-position this part of Castle Mall as a commercial leisure destination.

In terms of Question 18, it is disappointing that there has been no question in relation to daytime and early-evening leisure activities. InfraRed however would support the continued location of Castle Mall within the defined Leisure Area, which would assist in supporting the diversification in uses and the encouragement of footfall in the Mall, aiding the vitality and viability of both the Mall and the City Centre more generally.

Therefore, and notwithstanding the assertion that the GNLP will not normally seek to amend Development Management Policies, InfraRed believes that the rapidly changing context faced by City Centre retailing generally, and Castle Mall in particular, would justify additional flexibility in terms of the policies that guide, and control, town centre uses in the City Centre.

## Representations – Site Proposals

InfraRed notes the submission, made by Icen Projects Ltd, for the mixed-use redevelopment at Anglia Square (site **GNLP0506**). While InfraRed appreciates the redevelopment of Anglia Square has long been an aspiration of Norwich City Council, InfraRed believes that the 20,000 sqm of retail floorspace promoted at the Centre is unjustified.

Anglia Square is considered a “*Large District Centre*” outside the City Centre in retail terms. It sits below the City Centre in terms of the retail hierarchy, and the adopted Joint Core Strategy (JCS) **Policy 19** supports retail floorspace at this location, but at a scale that is appropriate to its form and function.

Anglia Square was formerly allocated pursuant to the Northern City Centre Area Action Plan (NCAAP); however this AAP reached its 10 year limit in 2016 and is no longer adopted policy. Notwithstanding this, it is noted that the AAP supported (in former policy AS2) some 3,600 sqm of retail development, principally in the form of a foodstore with more limited, complementary retail provision of units below 200sqm.

Following expiration of the NCAAP, the Council issued non-statutory guidance, in the form of the *Anglia Square and Surrounding Area Policy Guidance Note (March 2017)* (hereafter, PGN). Though not policy, this document is used as a “material consideration” in the determination of planning applications in this area. While this no longer identified appropriate retail floorspaces within any development at Anglia Square, the PGN states (para 7.27) that,

*“The Council will encourage the provision of a higher quality retail environment with additional retail floorspace, whilst acknowledging that Anglia Square will continue to perform a different role to the primary retail area of the City Centre, with a greater focus on serving the convenience needs of the largely residential areas to the north, east and west.” (Our emphasis).*

The stance of both the NCAAP and the PGN, in identifying Anglia Square as a “*complementary*” offer to the City Centre is supported in the evidence base, notably the Council’s 2007 Retail Study.

In terms of the 2017 Retail Study in support of the GNLP, this concurs with the approach that supports the redevelopment of Anglia Square, but considers that (para 5.1) Anglia Square’s role remains one of “*meeting more localised shopping needs*”. As noted above, InfraRed also notes the Retail Study’s identification of an over-supply of retail floorspace, at least in the short-term.

Accordingly, InfraRed considers that the quantum of additional retail floorspace outlined by the site promoters is not properly justified. Anglia Square performs a role and function commensurate with its allocation as a District Centre, within the hierarchy of centres. InfraRed contends that additional retail capacity, should it be needed, should be accommodated within Town Centre Sites (i.e. within Norwich City Centre) first. Anglia Square performs, and should perform, a localised, complementary shopping role, which must be reflected in any resulting allocation.

InfraRed is concerned that, given the additional quantum of residential development that is being proposed in Icen’s submission at **GNLP0506**, that the very significant increase in retail floorspace being proposed might not be subjected to proper scrutiny and assessments as to retail impact on the City Centre. InfraRed therefore opposes the quantum of retail floorspace proposed in that submission on this basis.

## Conclusion

InfraRed is broadly supportive of the Growth Options as a document which seeks to support the role and function of Norwich City Centre. As explained InfraRed seeks to ensure that there is the necessary flexibility within the forthcoming GNLP allowing for a mix of town centre uses within Primary Shopping Area.

Within the Site Proposals document, InfraRed considers that the site promoter’s identification for 20,000 sqm of retail floorspace at Anglia Square is unjustified. This in light of both the changing town centre and retail environment and capacity identified in the representations on the Growth Options identified above, and also

the appropriate role of Anglia Square as a District Centre, intended to complement, not compete with, the Retail and Town Centre offer of the City Centre and provide for local shopping needs.

On behalf of our client, InfraRed, we request to be kept further informed with progress of the GNLP and wish to reserve our client's position to make further representations on subsequent consultation documents

Yours faithfully,

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