Representor reference: CPRE Norfolk 6826 Matter 6

## Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership

## MATTERS & KEY QUESTIONS FOR EXAMINATION AT THE HEARINGS

## Response from CPRE Norfolk

MATTER 6 Norwich City Centre (policy 11) and the remainder of the Norwich Urban Area Parishes (policy 12)

- 1. A The JCS does not present a clear and justified core strategic guidance of the City Centre; nor for the city as a whole does it consider the interactions with other housing and employment growth locations in the NPA, other than being the geographical centre, as displayed by the figure at page 59. The Norwich City Centre key diagram is displayed at page 73. It is essentially bounded by the inner ring road, but with Anglia Square (in part) and Brazen Gate lying outside. The Northern City Centre, which includes the Anglia Square Area, is to be developed as an Area Action Plan (contrast Rackheath). The St Stephens Area will be developed with its masterplan, and will be adopted as a Supplementary Planning Document.
- 2. There is an emphasis on extending and building on the existing strengths of retail and commercial development, with at least 100,000sqm of new offices to accommodate for uses including media, creative, financial, business and professional services, and information communication industries. Significant retail expansion is expected in comparison and, to a lesser extent, convenience products. These ambitions need to be evaluated against the current expectations for the economy as a whole and the market in these areas; the effect of competition through major employment and housing growth in the north east sector; and the fact that just 2,750 dwellings are planned for the city centre between 2008 and 2026.
- 3. The tourist and visitor sector would be expected to be more buoyant, with a significant uniqueness factor, and would benefit from the regeneration of historic but run-down areas in need of regeneration; plus the ambition for concert and conference facilities. This should be combined with continuing improvements by public transport as the hub within the Greater Norwich Area.

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4. **B** The current focus of Riverside is retail and leisure, especially the evening economy. There is no explanation for some move to commercial, and particularly an expansion is envisaged for the evening economy. The Brazen Gate complex appears to show no change. Overall, the function of all areas should be reviewed in light of changing economic circumstances.

- 5. C While dealing with the City Centre in policy 11, and the urban fringe parishes in policy 10 and a re-cap in policy 12, little is said about the remainder of Norwich. The new housing commitments for Norwich (page 43) for the period 2008-2026 are 8,592; the Broadland NPA 11,099; and South Norfolk NPA 13,156. We ask if this distribution is the best that can be done in utilising Norwich for the provision of housing in the NPA. We suggest that while total NPA dwelling provision should see a significant overall reduction, that within the city boundaries it could and should be increased.
- 6. The statements in policy 12 on the rest of Norwich are general and mundane, such as to identify and regenerate tired suburbs and promote neighbourhood-based renewal. Priorities for regeneration are given as the northern wedge area, western area and east Norwich. There are no indications on what the measures will be; and given all the infrastructure required for new development, what might be required and the viability on cost considerations.
- 7. <u>D</u> Soundness for the JCS for the City Centre requires consideration of the points made at A above; and in point C above for the bulk of the parishes. More needs to be said on the impacts on the urban fringe parishes affected by major new development, other than the claim that the NDR would relieve traffic congestion in the north east sector.
- 8. CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.