Greater Norwich Development Partnership

Topic Paper: City Centre

Joint Core Strategy for Broadland, Norwich and South Norfolk November 2009

Jobs, homes, prosperity for local people









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1. Summary

This topic paper is part of a series that explains how key aspects of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk have been developed. The city centre policy and key diagram (see appendix 1) set out the spatial strategy for the city centre until 2026. It is important that the strategy makes the best of the distinctive assets of the city centre, most particularly its world class heritage assets. It must continue the success of recent years - Norwich has been referred to by government as an example of "best practice" for planning for town centres and has the highest proportion of its retailing in its centre of any major city in the country. This is the result of the long term policy approach of promoting a vibrant city centre and restricting out-of-town development.

Purpose of this topic paper

This topic paper provides the justification for the policy approach set out in the Joint Core Strategy for Norwich City Centre. It is divided into the following sections:

Section 1. This identifies the main changes in the city centre in recent years, particular planning concerns in the centre and sets out the previous policy framework in the Local Plan that the Joint Core Strategy will supersede.

Section 2 outlines the context for the strategy for the city centre. It looks at national and regional policy and the local strategic context for the policy.

Section 3 considers the evidence base, including evidence studies, sustainability appraisal, consultation and SWOT analysis. It the shows why the chosen city centre strategy proposed in the submission document of the Joint Core Strategy was identified as the best approach. It identifies the main areas of change and justifies the strategy for those areas.

3. Background – managing change in recent years

Until the 2009 recession, the city centre and adjoining areas experienced rapid regeneration, unprecedented in recent years. A large proportion of the redevelopment has been for flats at high densities, with an average density of development 135 dwellings per hectare in recent years. In the 5 years from 2004/5 to 2008/9, approximately 1200 dwellings were completed in the city centre, with a peak in 2007/8 of 524 dwellings, but delivery slowed to approximately 225 in 2008/9. In addition, there has been significant development of leisure facilities, mainly at Riverside and new cultural facilities have been provided at the Forum. Large scale retail development has taken place at Chapelfield, specialist shopping areas have been promoted and the market has been renewed. Major office development is taking place at

Whitefriars and Duke's Wharf has planning permission for further high quality offices.

In terms of access to the centre, Norwich has one of the most extensive park and ride services in the country. Together with general bus priority and improvement measures and controls on parking, this has enabled the city centre to avoid the increasing traffic volumes experienced elsewhere. Public realm improvements have been made in many parts of the city centre, which have made it more attractive and promoted sustainable transport.

A number of particular concerns required particular consideration –

- The Anglia Square and Magdalen Street area, which needs revitalising and where an Area Action Plan is now close to adoption;
- The general search for a concert hall/ exhibition and conference venue, which is the primary attraction which the City Centre lacks at present;
- The need for further improvements to the stock of offices, both in terms of quantity and quality;
- Improvements to tourist and leisure facilities, to make best use of the city centre's historic and cultural assets and reduce conflict between late night activities and other city centre uses.

The City of Norwich Replacement Local Plan (2004) identifies;

- A Primary and Secondary Retail Area, with policies to control ground floor frontage use in the defined areas;
- A Leisure Area, part of which is identified also as a Late Night Entertainment Area, where late night, noisy activities are permitted;
- The whole area within the City Walls as a Conservation Area and mainly within that area, an Area of Main Archaeological Interest, where a high standard of archaeological investigation is required before any development takes place;
- A number of regeneration areas with specification of the aims of regeneration in each case and a broad mix of uses to be provided on each site;
- Specific policies for the Anglia Square/ Magdalen Street Large
 District Centre, which is intended to serve the everyday shopping
 needs of the north of Norwich; This policy is shortly to be
 superseded by a comprehensive regeneration plan for the area, set
 out in the Northern City Centre Area Action Plan.

 Provision for pedestrian and cycling improvements in the centre, with three river bridges identified (two of which has been built and the third has planning permission);

The strategy ensures that housing is included in nearly all city centre development schemes, in order to bring life to the centre outside normal working hours.

4. Context for the City Centre Strategy

The strategy must take a long term view to make the best of the city centre's assets and potential and ensure local implementation of national and regional policy, using the findings of the local evidence base.

National and Regional Policy

National planning policy in PPS1 requires all development to be sustainable and to protect and enhance the local environment. PPS3 requires the provision of a mixture of housing types including family housing and affordable housing, along with mixed uses, to create vibrant, mixed communities and promote regeneration.

PPG4 requires that adequate land is made available for businesses. Draft PPS4 gives preference to sites in or on the edge of city centres for large office developments and promotes leisure development to be spread around centres. PPS6 says that LDFs should promote the vitality and viability of city centres and actively plan for retail growth firstly by making better use of existing retail areas and secondly, where necessary, extending the centre. A good range of services should be provided which are accessible to all.

PPG13 requires high density development in areas of good accessibility, particularly close to transport nodes. PPG15 and 16, the main national guidance relating to historic areas, require development to be designed to conserve and enhance the historic built environment, including archaeology.

PPS25 requires proposed developments in areas at some risk of flood to be carefully assessed. Any development has to be specifically designed to cope with flood – areas of the city centre close to the River Wensum are in flood zones 2 and 3.

Regional policy requires:

- Norwich to be a regional focus for housing, employment, retail, leisure and cultural development;
- A shift to more public transport use;
- Promotion of tourism, and of the city centre as a gateway;
- Development to complement the outstanding historic heritage and Norwich's image as the "contemporary medieval" city;
- Promotion of media and creative industries, finance and insurance, and information communication technologies.

Existing Local Strategy

The City's **Community Strategy** demonstrates a strong commitment to maintaining and regenerating the city centre in objectives such as:

"support development of a vibrant city centre"

"ensure a strong economic component in neighbourhood renewal and regeneration".

5. The evidence base

As well as national and regional policy, **local evidence studies** underpin the policy approach:

Issue	Policy approach	Evidence	
Employment	 A main focus for city centre development. Areas specifically identified for commercial development. 	Employment Study Many offices out of date and need to update to counter less sustainable pattern of extensive office development on edge of city. Intensification and expansion needed, with at least 100,000 m² of new offices required to 2021	
Retail	 Provides for: intensification or expansion of primary retail area to meet future comparison goods need; convenience need will largely be met through a new supermarket at Anglia Square; 	The Retail and Town Centres Study Study indicated capacity for very significant growth in comparison goods floorspace (68,000 m² to 2021) with a modest need for convenience goods. However, given the uncertainties around long term forecasting and the	

Issue	Policy approach	Evidence
	 3. other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets 4. Around 30,000 m2 of comparison goods floorspace to 2016 	unpredictable impact of the 2009 recession a relatively cautious approach is taken in the policy. Consequently, 30,000 m² of comparison goods floorspace will be permitted to 2016. Retail need will be monitored and further analysis done later in the JCS period
Leisure	 A main focus for city centre development. Revised and enlarged city centre leisure area considered appropriate for leisure development, with a continued focus for late night activities at Riverside, Prince of Wales Road and Tombland. Development Management policies to provide further detail. Need for SPD to be determined. 	The Retail and Town Centres Study identifies the city centre's pre-eminence for leisure and cultural activities and the need to widen that range of facilities with further development of at least 11,600m² by 2021;
Transport	Improved access to and within the city centre in particular to strengthen its role as a gateway and hub of an enhanced public transport system and improved cycling and pedestrian environment.	Norwich Area Transportation Strategy (NATS) will identify further measures to promote sustainable transport in the city centre
Waste Water	Sewers to serve major new developments outside city centre to be routed away from city centre by Anglian Water	Water Cycle Study Need for upgrading of sewers in the city centre and limit on routing of sewerage through city centre
Green Infrastructure and Open	Policy requirement for improvements to public realm, open spaces and	Green Infrastructure Study and Open Space Needs Assessment

Issue	Policy approach	Evidence
Spaces	green links, using new pedestrian bridges	Further improvements to green links within the city centre and to the river valleys, Mousehold and the open countryside. More and improved open spaces and improved public realm
Design	New development to be designed to make the best of the historic environment, whilst also promoting innovative, sustainable design.	The City Centre Conservation Area Appraisal identifies character areas within the city centre and provides design guidance which should be followed. It could be adapted to be a Supplementary Planning Document
Renewable Energy	Sustainability standards for new homes and commercial buildings should be met through off site provision or a combination of onsite renewable sources with offsetting payments.	Energy Study
Housing	Requirement for a minimum of 2,750 dwellings in the city centre 2008 to 2026. This figure is below the average completions rate for the past 5 years. However, it is a minimum figure and reflects the fact that land will be required to support the regional role of the city centre for employment. Housing will often be as part of mixed use development and family housing will be provided.	Housing Market Assessment, Strategic Housing Land Assessment (SHLAA), monitoring and trajectory from Annual Monitoring Report (see appendix 4) Studies and monitoring establish housing capacity and the need for a greater supply of affordable rented properties.
Flood Risk	Subsequent DPDs to show flood risk zones with policies implementing national	The Strategic Flood Risk Assessment has identified areas in the city centre at

Issue	Policy approach	Evidence
	requirements	different risks of flood. Parts of the City Centre are within "Zone 2 and 3" flood risk and a further study to provide more detail of flood risk locally is being done to inform the Site Allocation and Development Management Plans
Conference Facilities	Culture is a main focus for city centre development. Site allocation policies could identify a site for a medium scale conference facility.	The Conference Centre Feasibility Study concluded that there is not a market for major new conference and concert facilities in the sub region. However, it identified that there is the potential to provide a new medium scale conference and concert facility, either by conversion or new build in the city centre

SWOT analysis

A SWOT analysis for the city centre was undertaken to inform policy making – see appendix 2.

Consultation

Consultation showed support for:

- Strengthening city centre's key strategic role as economic driver of the sub-region;
- Promotion of employment opportunities in the city centre;
- Intensification of retail uses;
- Sustainable solutions to transport issues;
- Concentration of late night leisure uses
- Ensuring the strategy makes best use of Norwich's historic and cultural assets
- Promotion of high density, mixed use development including a substantial element of housing.

Identifying the city centre strategy

Three possible strategic options for the city centre were assessed at the Issues and Options stage of plan making:

- 1. The Preferred Option Commercial and Cultural led development
- 2. Rejected Option a) Housing led development Rejected Option b) - Market led development, with no spatial planning strategy for the city centre

Further detail is set out in appendix 3.

The chosen option promotes major retail, leisure, office, culture and tourism related development in line with regional policy, as the East of England Plan identifies Norwich as a regional centre and transport node. The strategy is broadly similar to the Preferred Option previously consulted on, but with:

- a change in wording to emphasise that housing and educational development will also be important in the city centre;
- a clearer promotion of mixed use development including housing, continuing the previous Local Plan approach.

This is required to meet need and to ensure that the centre becomes increasingly vibrant both during the day and in the evening. The **minimum** housing requirements are approximately 65% than those achieved in the last 5 years. These targets are based on a clear evidence base from the Strategic Housing Land Assessment as to the housing capacity of the remaining brownfield sites in the city centre likely to come forward for development in the plan period (see appendix 4). The target for new dwellings, including mixed uses with housing and family housing, is a **minimum** of 2,750 dwellings 2008 to 2026, including existing permissions and allocations. The policy also takes account of:

- the fact that many of the city centre brownfield sites have been developed in recent years;
- the need to ensure that sufficient land is available for regional services such as employment, retailing and leisure.

This is necessary because of the priority now placed on employment uses in the most sustainable location in Greater Norwich resulting from:

- regional policy, which requires a substantial growth in employment;
- the evidence base, which shows that at least 1000 m² of new offices will be required in the city centre. Recent market trends support such an approach, showing a revival in demand for high quality offices, but with little demand for older, poorer quality offices and pressure in some cases for conversion to housing. Regional policy and the evidence base have also identified that a substantial amount of space is required for other service related uses, such as leisure and tourism.

The **Sustainability Appraisal** shows this option to be the most sustainable as it co-locates employment, services and housing to address threats to employment uses and focus employment growth on the most sustainable location in sub-region. This will both reduce the need to travel and ensure

maximum use of sustainable transport modes. This will reinforce the success of transport policies such as Park and Ride, whilst also making the city centre the hub for bus rapid transit services to and between the sustainable urban extensions.

The Anglia Square, St Stephens and Rose Lane areas are identified as areas for comprehensive redevelopment in the city centre policy. The key diagram also identifies areas 4 to 7 below as **areas of change**.

		Focus of change	Planning background		
C	Comprehensive Regeneration Areas				
1.	Anglia Square	Retail, commercial, housing,	 North City Centre Area Action Plan nearing adoption, planning permission granted on part of site enables regeneration of deprived area 		
2.	St Stephens	Commercial, retail, housing	St Stephens Masterplan in development		
	Rose Lane/ St Annes Wharf	Commercial and housing, some retail	SPD to be developed		
	ther areas of chan				
4.	King Street/Rouen Road	Commercial and housing	Continuation of long term regeneration of King Street and potential for comprehensive housing improvement scheme		
5.	Riverside	Commercial	Potential to make better use of extensive areas of surface car parking in retail area in accordance with PPS6		
6.	Whitefriars	Commercial, hotel, housing	Planning permission granted for office led development, first phase complete		
7.	Barn Road	Retail and commercial, some housing	Continuation and extension of Local Plan allocation to redevelop gateway site		

6. Conclusion

As a spatial strategy, the Joint Core Strategy must promote sustainable economic, social and environmental benefits for the city centre and the subregion it is the hub of. All new development must be sustainably designed to enhance both the historic and modern assets of the city and to ensure the city centre is able to adapt to a rapidly changing climate and economy.

Appendix 1: City centre policy and text from the Pre-Submission version of the Joint Core Strategy

Policy 11 Norwich City Centre

The regional centre role will be enhanced through an integrated approach to economic, social, physical and cultural regeneration to enable greater use of the city centre, including redevelopment of brownfield sites. It will be the main focus in the sub-region for retail, leisure and office development. Housing and educational development will also reinforce the vibrancy of the city centre. Its role will be promoted by:

- enhancing the historic city, including its built and environmental assets and its distinctive "contemporary medieval" character through innovative, sustainable design;
- strengthening the city's role as a cultural centre and visitor destination of international importance, with additional tourist facilities;
- expanding the use of the city centre to all, in particular the early evening economy and extending leisure and hospitality uses across the whole of the city centre, with late night activities focussed in identified areas;
- enhancing its retail function, providing for a substantial expansion of comparison retail floorspace of varied types and size of unit to provide a range of premises. This will be achieved through intensification of uses in the primary retail area and if necessary through its expansion; other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets;
- expanding its function as an employment centre, including provision of high quality office premises and a diversity of uses across the area, including media, creative, financial, business and professional services and information communication industries.

Housing development densities will generally be high, but family housing will also be provided to achieve a social mix. Housing will be provided as part of mixed use development wherever possible, particularly in areas A, B and C as shown in the Key Diagram.

To support these roles, improvements will be made to:

- the public realm;
- open spaces, green linkages and connections between open spaces, linking to the river corridor and the open countryside;
- walking and cycling provision;
- sustainable transport access to and within the city centre in accordance with the Norwich Area Transportation Strategy, in particular to strengthen its role as a gateway and hub of an enhanced public transport system

Areas of the city centre will be comprehensively regenerated:

- The Northern City Centre will be developed in accordance with its Area Action Plan to achieve physical and social regeneration and utilise significant redevelopment opportunities.
- The St Stephens area will be developed for mixed uses in accordance with its Masterplan, to promote retailing, offices and housing and to create an improved pedestrian environment.
- The Rose Lane area will be a major focus for commercial development.
- 6.24 Norwich is a regional centre and transport node. The city centre is the most sustainable location for major retail, leisure, office, culture and tourism related development in line with regional policy. Concentration of such development will boost agglomeration benefits. Evidence shows that the city centre will need to accommodate at least 100,000 m² of new offices up to 2026. Retail need is difficult to predict over long periods but research in 2007 indicated capacity for very significant growth in comparison goods floorspace with more modest need for convenience goods. . The latter will principally be delivered through a major new foodstore at Angla Square. Given the uncertainties around long term forecasting and the unpredictable impact of the 2009 recession a relatively cautious approach will be taken to comparison goods floorspace growth. Consequently, opportunities will be sought for around 20,000 m² of comparison goods floorspace to 2016. Retail need will be subject to regular monitoring and refreshed analysis to ascertain whether further new floorspace is required for the later JCS period. The St Stephens Masterplan will identify the appropriate scale of retail development for the area, through intensification or expansion of the primary retail area, primarily for comparison goods retailing
- 6.25 Research has also identified that a substantial amount of space is required for other service related uses, such as leisure and tourism The Retail and Town Centres Study demonstrates that 11,600 m² of cafe, restaurant and bar development could be required to 2021 in the Norwich urban area, the vast majority of which should be in the city centre. Ideopolis evidence demonstrates that investment in cultural assets benefits residents, workers and visitors adding "Quality of Life" and acts as a key factor in attracting and retaining highly skilled workers. The Conference Centre Feasibility Study (2009), concluded that there is not a market for major new conference and concert facilities in the sub region. However, it identified that there is the potential to provide a new medium scale conference and concert facility, either by conversion or new build in the city centre.
- 6.26 Educational development should include a Retail Academy to support and enhance the City's unique retail offer and help to maintain and improve its ranking as a top ten UK shopping centre and the best in the

region.

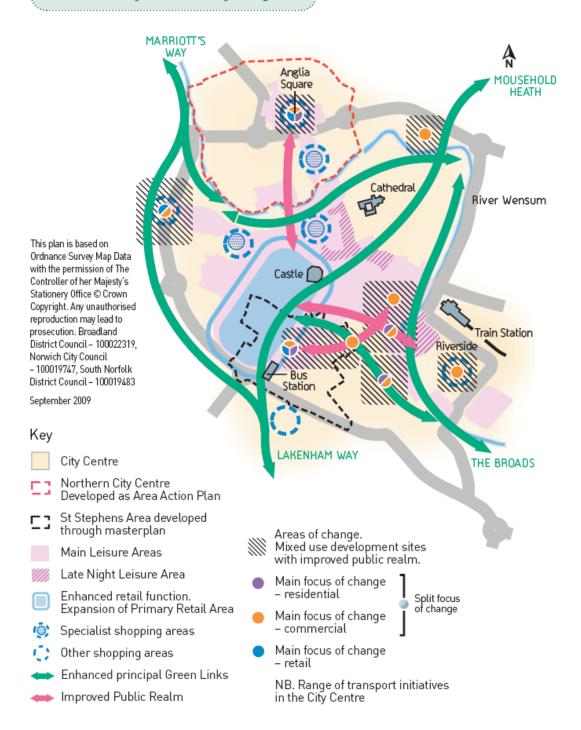
- 6.27 Housing growth is required to meet need and to further promote a vital and vibrant city centre community. Taking account of committed development and new allocations, a minimum of 2,750 dwellings will be provided in the city centre between 2008 and 2026.
- 6.28 An Area Action Plan for the Northern City Centre is expected to be adopted prior to the adoption of this JCS. Redevelopment of the Rose Lane area will be guided by a Supplementary Planning Document.
- 6.29 Parts of the City Centre are within "Zone 2" flood risk and more detailed studies will be undertaken to support site specific DPDs.

Contributes to spatial planning objectives 1, 2, 3, 4, 5, 6, 8 and 9

References Policies for places, Policy 11

- East of England Plan Policy NR1
- Planning Policy Statement 6 (PPS6) Town Centres
- Feasibility Study for a Conference Centre and Concert Hall for the Greater Norwich Area (2009)
- Norwich Sub Region: Retail and Town Centres Study (2007)
- Employment Growth and Sites and Premises Study (2008)
- Strategic Flood Risk Assessment
- Ideopolis: Knowledge City Regions (2006)
- Norwich City Council Annual Monitoring Reports
- Strategic Housing Land Availability Assessment
- Northern City Centre Area Action Plan
- St Stephens Area Masterplan
- Norwich Area Transportation Strategy

Norwich City Centre key diagram



Appendix 2: SWOT analysis

Strengths

- County/regional centre long term policy has retained the primacy of city centre's role
- Diverse business base (including financial services, creative industries, retail, tourism and public administration) and high employment density, with high proportion of large employers
- Top 10 retail centre nationally
- Vibrant centre with extensive heritage, cultural, leisure and sports offer
- Lively evening economy focussed on specific zones
- Transport hub with good public transport links (including Park and Ride) and reduction in other traffic in the city centre in recent years
- High quality historic and modern townscape
- Good pedestrian network linking open spaces and a green environment ("city in an orchard") including the river, riverside walk and other green links
- High and growing residential population
- Relatively high quality of life and social cohesion, with low levels of crime
- Higher and further education (including Norwich School of Art and Design)

Weaknesses

- Air Quality in some areas (particularly Grapes Hill, Castle Meadow and St. Augustine's Street)
- Lack of clear positive external identity to sell city's assets
- Outdated and insufficient office accommodation
- Some areas of social deprivation
- Some poorly designed development, particularly from 1960s and 70s
- Some derelict sites
- Lack of high quality concert hall and conference facilities
- Quality of cross city centre public transport linkages
- Lack of family housing
- Need for further affordable housing

Opportunities

- Growth of all business sectors, particularly creative, business services, education, retailing, tourism and public administration
- Sites available and demand for retail, commercial and residential expansion with short to medium term availability of brownfield land and potential for intensification of uses
- Potential to expand tourism
- Potential for good quality, well designed development which takes account of historic setting (guidance in Conservation Area Appraisal)

- and mitigates against and is adapted to a changing climate (including flood risk)
- Increasing ethnic and cultural diversity
- Potential to support and expand specialist retail sector
- Growth provides opportunities to improve public transport networks, remove through traffic and further improve public realm and cycling network by enhancing and extending open spaces and linked networks
- Potential to disperse leisure uses, whilst retaining differentiated evening/night time activities and to build up early evening sector

Threats

- Sewerage capacity
- Disproportionate dependency on large scale employers
- Flood risk in some areas
- High proportion of flats developed recently, while PPS3 requires mix of house types, including family housing
- Threat to employment uses from housing
- Lack of speculative high quality office development

Appendix 3: Options assessed at Issues and Options stage

Identifying the city centre strategy:

Three possible strategic options for the city centre were assessed in identifying the preferred option:

- 1. The Preferred Option Commercial and Cultural led development
- 2. Rejected Option a) Housing led development
- 3. Rejected Option b) Market led development, with no spatial planning strategy for the city centre

1. The Preferred Option - Commercial and Cultural led development

Norwich is a regional centre and transport node. The Preferred Option therefore promotes further major retail, leisure, office, culture and tourism related development in line with regional policy. Like the strategic approach in the City of Norwich Replacement Local Plan it replaces, it continues to promote mixed use development, though now with a greater emphasis on commercial uses. So while housing development is still supported through the Preferred Option, it would be less of a priority for the future than previously.

This is because of the greater priority now placed on employment uses in the most sustainable location in Greater Norwich resulting from:

- regional policy, which requires a substantial growth in employment;
- the evidence base, which shows that at least 1000 m² of new offices will be required in the city centre. Recent market trends support such an approach, showing a revival in demand for high quality offices, but with little demand for older, poorer quality offices and pressure in some cases for conversion to housing. Regional policy and the evidence base have also identified that a substantial amount of space is required for other service related uses, such as leisure and tourism. As a result of the reduced emphasis on housing, more limited housing development is still supported in the Preferred Option. It is important that significant housing is provided to meet need and to continue the city centre's success in creating a vital and vibrant community. The target for new dwellings, including mixed uses with housing and family housing, is a minimum of 2,750 dwellings 2008'21, including existing permissions and allocations.
- the Sustainability Appraisal which shows the Preferred Option to be the most sustainable as it co-locates employment, services and housing to address threats to employment uses and focus employment growth on the most sustainable location in sub-region. This will both reduce the need to travel and ensure maximum use of sustainable transport modes. This will reinforce the success of transport policies

such as Park and Ride, whilst also making the city centre the hub for bus rapid transit services to and between the sustainable urban extensions.

Rejected options:

2. Option a) Housing led development

This option would continue the present City of Norwich Replacement Local Plan approach which requires all city centre development to be mixed use and would not have a significant focus on commercial development. The **evidence base** shows that in recent years housing completions have been above requirements in Norwich, though there is still considerable need for affordable housing. It also shows that substantial amounts of land in the city centre must be used for commercial development to meet employment requirements.

The **Sustainability Appraisal** showed that over concentration on housing in city centre would lead to unsustainable movement patterns by creating more need to travel. This is because any decline in employment in the city centre would lead to reverse commuting to many different employment areas which can not be served as effectively by public transport as the city centre.

3. Option b) Market led development, with no spatial planning strategy for the city centre

This approach would allow market led development with limited intervention, in effect therefore providing no strategy. Government policy would not support this approach as it would not lead to sustainable development, as evidenced by the findings of the sustainability appraisal. This stated that such an approach would be contrary to government policy and would not promote sustainable development as there would be a limited mix of uses.

Appendix 4: City centre housing

At April 2008, there were sites with planning permission for 1704 new dwellings in the city centre. In addition, the Strategic Housing Land Assessment (SHLAA) identified sites with the potential to develop 1220 further dwellings, to give a total of 2924 dwellings. It has been assumed that the majority of, but not all of the potential identified in the SHLAA, will be developed. The text below the city centre policy therefore requires and minimum of 2750 dwellings to be provided, including existing commitments, from 2008 to 2026. This figure equates to just over 150 dwellings per annum, below the average of 332 for the 2004-8, but reflecting:

- 1. The fact that a significant proportion of the brownfield sites in the city centre have been developed in recent years;
- 2. The regional importance of the city centre for employment, retail and leisure functions restricting the amount of land available for housing, as identified by the Sustainability Appraisal
- 3. The government requirement that a higher proportion of housing in all areas should provide for families and therefore be developed at somewhat lower densities than in recent years (in 2007/8 average densities were 180 dwellings per hectare, compared with 58 outside the centre).

For more information or if you require this document in another format or language, please phone:

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