

Sustainable development panel

Date: Tuesday, 27 February 2024

Time: 16:00

Venue: Mancroft room, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:

Councillors:

Hampton (chair)
Giles (vice chair)
Carrington
Champion
Driver
Hoechner
Lubbock
Oliver
Osborn

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Agenda

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1 Apologies

To receive apologies for absence

2 Declarations of interest

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3 Minutes

5 - 8

To approve the accuracy of the minutes of the meeting of 14 November 2023

4 Greater Norwich Local Plan - Adoption

9 - 112

Purpose - To consider the outcome of the examination into the Greater Norwich Local Plan (GNLP) and to recommend adoption of the plan.

5 Draft Statutory Biodiversity Net Gain Supplementary Planning Document

113 - 164

Purpose - To present information on statutory Biodiversity Net Gain and the contents of the draft Statutory Biodiversity Net Gain Supplementary Planning Document.

6 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor

165 - 224

Purpose - To report and discuss the findings of the October 2023 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.
The Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor is the council's monitoring report advising of vacancy rates and changes of shop type across the city. Monitoring ensures that the council can measure the implementation of policies on retail monitoring and consider whether to implement them in a more flexible manner or to take an alternative approach taking into consideration market demands and trends.

Date of publication: **Tuesday, 20 February 2024**



Sustainable Development Panel

16:00 to 17:00

14 November 2023

Present: Councillors Hampton (chair), Giles (vice chair), Carrington, Champion, Driver, Hoechner Lubbock and Oliver

Apologies: Councillor Osborn

1. Declarations of Interest

None.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 3 October 2023.

3. 2021/22 Annual Monitoring Report

The Planning Policy Team Leader presented the report and apologised that in the absence of the report author, she would take back any questions that required further information. The full Greater Norwich Development Partnership Annual Monitoring Report (AMR) 2021/22 had been published temporarily on the council's website but would be available on the Greater Norwich Growth Board's website. The report provided the information to monitor the effectiveness of the Greater Norwich Joint Core Strategy for the period 2021 to 2022. As in the previous period (2020/2021) the AMR report had been published later than usual due to the delay caused by the pandemic and the Greater Norwich Development Team's resources being diverted to focus on the public examination of the Greater Norwich Local Plan (GNLP), due to be adopted in March 2024.

During discussion members of the Planning Policy Team Leader advised members that the AMR covers only the period 2021 to 2022. She also undertook to provide further information to questions outside the meeting. (These responses are appended to the minutes of this meeting at Appendix A.)

In reply to a member's question, regarding Table 3.31 Number of listed buildings lost/demolished, the Planning Policy Team Leader explained that the data would not

reflect the more recent loss of listed or locally listed buildings lost to fire or demolished outside this period¹.

A member asked how the monitoring of the reduction in carbon emissions was included in the process, mapped against targets. She considered that the current monitoring was inadequate. The Planning Policy Team Leader said that it was acknowledged that the monitoring data would change when the new GNLP was adopted. This could not be finalised until the completion of the plan as monitoring referred to each policy. She would take this back as an action.

A member referred to Table 3.30 Percentage of Sites of Special Scientific Interest (SSSIs) and asked why the data was missing for the period 2018 to 2020. The Planning Policy Team Leader said that this data was measured by the Environment Agency, and it could be that the data was not available for the period. A member suggested that some of this could be due to the constraints of lockdowns due to Covid during this period.

A member pointed out that the action against the climate change score card showed that progress in achieving the aims of the policies had performed well. She considered there needed to be further information to break down the data by land use, local government area and financial/economical areas. In reply, the Planning Policy Team Leader said that there would be a new set of data connected to the objectives of the policies. Some data relied on third parties and moving forward new sources of publicly available data would be used to monitor the effectiveness of the policies by the GDLP team.

A member referred to Table 3.23 Objective 5: to allow people to develop to their full potential by providing educational facilities to meet the needs of existing and future populations and said that there needed to be a new indicator that picks up the young people who were not in education, training, or apprenticeships. The Planning Policy Team Leader said that this was useful feedback.

The panel discussed the five-year land supply. The Planning Policy Team Leader said that she was not aware that there was an exemption to demonstrate a five-year land supply because of Nutrient Neutrality. It was expected that at the time of adoption of the GNLP, it would be possible to demonstrate the five-year land supply. It was important for local planning authorities to be able to defend against proposals for development of less sustainable sites.²

Discussion ensued in which a member asked at what date did Nutrient Neutrality cease to be an issue for Broadland District Council, South Norfolk Council and the

¹ The report author subsequently confirmed that the number of listed buildings lost/demolished during the zero.

² The report author subsequently provided the following response – For the purposes of decision making, the Greater Norwich authorities have not sought to demonstrate a five-year land supply since March 2022 due to the constraints introduced by the requirement for development to demonstrate nutrient neutrality. As part of the preparation of the Greater Norwich Local Plan, a housing trajectory has been produced. This takes a cautious approach to housing delivery, taking account of nutrient neutrality. Taking account of progress being made in respect of both private and council nutrient mitigation schemes, the Greater Norwich authorities consider there is sufficient clear evidence to demonstrate a five-year land supply at the point the GNLP is adopted.

city council and commented that the mitigation that was being put in place appeared to be piecemeal. The Planning Policy Team Leader said that there was discussion on individual sites at the public examination. The joint venture, the Norfolk Environmental Credits, and the city council's own nutrient mitigation scheme to retrofit council housing stock, allowed some planning consents to be granted. A member expressed concern that mitigation was costly and that the local councils did not have the money to compulsory land to provide it.

A member said that she considered that the measurement of only two particulates for air quality monitoring was inadequate. She considered that this should include all the particulates recommended by the World Health Organisation (WHO) to lower the threshold of air pollution for human life.

Discussion ensued on the AMR data and that its principal function was to monitor the efficacy of the policies in the local plan and as evidence to support initiatives. An example of this was the introduction by the council for an Article 4 Direction in response to loss of office floor space following the relaxation of permitted development rights.

Members noted that the Greater Norwich Growth Board would consider the AMR at its next meeting and the full report would be available on its website.

In reply to a question from a member, the Planning Policy Team Leader said that the award of credits in relation to Nutrient Neutrality fell outside the period 2021 to 2022 covered by this AMR. There would be a report to cabinet to determine whether the council joins the joint venture in due course. Three planning applications for developments, which includes Anglia Square, have been granted conditional to the council's credit mitigation scheme.³

The Planning Policy Team Leader said that she was not aware of the progress on the DM26 Progress on the implementation of the UEA Masterplan.⁴

RESOLVED to:

- (1) note the contents of the 2021/22 GNDP Annual Monitoring Report;
- (2) note that the panel considers that monitoring data going forward should include:
 - (a) more robust carbon emissions data;
 - (b) a breakdown of the climate change score card by land use, local government area, and financial/economic area;
 - (c) a new indicator to ensure that people in education/training or apprenticeships.

³ Three planning permissions have been issued at Anglia Square, Argyle Street and Ber Street with the intention of using credits under the city council's mitigation scheme.

⁴ There is no more up to date information in relation to the UEA Master Plan available. The council continues to meet with the Higher Education Institutions in Norwich to understand their growth plans as part of our engagement around Purpose Built Student Accommodation, and any updates will be reported as part of the next Annual Monitoring Report.

- (d) ensure that the monitoring of Air Quality particulates is in accordance with the WHO recommendations;
- (3) ask the Planning Policy Team Leader to provide further information to members' questions (responses were subsequently provided by the report author and have been included in these minutes as footnotes.)

CHAIR



Committee name: Sustainable development panel

Committee date: 27/02/2024

Report title: Greater Norwich Local Plan

Portfolio: Councillor Stonard, Leader of the council

Report from: Executive director of development and city services

Wards: All wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the outcome of the examination into the Greater Norwich Local Plan (GNLP) and to recommend adoption of the plan.

Recommendation:

It is recommended that Norwich City Council's cabinet and full council be recommended to:

(1) note the inspectors' report (in annex 1) and include the required main modifications in Appendices 1 to 5 (available from [this link](#)) in the GNLP;

(2) adopt the GNLP available from [this link](#);

(3) delegate authority to the Executive Director, Development and City Services to publish the Adoption Statement and accompanying documents so that the GNLP becomes part of the Adopted Local Plan for Norwich.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.

- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report's content addresses the following corporate aims of: Norwich is a sustainable and healthy city; and Norwich having the infrastructure and housing it needs to be a successful city.

This report also addresses the refine and deliver the strategic framework for city development priority in the Corporate Plan

This report helps to meet the following objective of the COVID-19 Recovery Plan:
Item 5: Housing, regeneration and development:

- Make progress on the Greater Norwich Local Plan to put in place a framework to guide development in the city and encourage it to be well designed and genuinely sustainable.
- Make the most of its own land holdings and financial capability to maximise rates of housing delivery through exemplary homes that meet the needs of the people of Norwich and develop a pipeline of sites that can be delivered over the medium to long-term.

Report details

Introduction

1. The report by independent Inspectors Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI into the soundness and legal compliance of the Greater Norwich Local Plan (GNLP) has been received. In line with the requirements of the Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a publication notice and the Inspectors' Report were published on the GNLP and the partners' websites on February 20th. Interested parties were also notified of the publication of the report.
2. The inspectors conclude that, subject to the inclusion of the main modifications they recommend being incorporated into the plan, the GNLP is sound and can be adopted as part of the local plans for Broadland, Norwich and South Norfolk.
3. This report provides a summary of the development and content of the GNLP and of the inspectors' examination conclusions. It proposes that, subject to Cabinet's recommendations, the GNLP recommends that the councils resolve to adopt the GNLP.
4. Annex 1 contains the Inspectors' Report along with the schedule of main modifications required to make the plan sound.
5. The GNLP, including the main and additional (minor) modifications, is available for information from [here](#).
6. If the councils resolve to adopt the GNLP, Adoption Statements will be placed on each of the three council's websites in line with Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
7. The Sustainability Appraisal of the plan is available [here](#). To meet the requirements of Regulation 16 of the SEA Regulations, an Environmental Adoption Statement will also be published.

Background

8. Greater Norwich has an excellent record of partnership working. We were one of the first partnerships nationally to adopt a joint local plan, the Joint Core Strategy, in 2011 (only 16 areas have adopted joint plans in England).
9. Since 2013, we have taken a successful and unique approach by pooling Community Infrastructure Levy (CIL) income from developers to help to pay for the infrastructure improvements we need. We have also worked with all the Norfolk planning authorities and with infrastructure providers and environmental

bodies to plan together for our strategic needs across the county and with Suffolk. As a result, growth has been well-planned, with new infrastructure delivered to support it, whilst at the same time protecting and enhancing our special environment.

10. Local plans set the development framework for an area, usually for the next 15 years. To do this, they:

- Contain planning policies which are the basis for deciding whether to approve planning applications.
- Allocate sites for development, including homes and employment sites, which respond to evidenced local needs and opportunities.
- Ensure that buildings and places are sustainable, beautiful and of a high quality.
- Facilitate the delivery of local infrastructure, such as new schools, health and community facilities, transport, and green infrastructure such as parks, street trees, local wildlife areas and woodlands.
- Protect and enhance the natural, built and historic environment.
- Respond to climate change and support nature recovery.

11. National policy requires local planning authorities (LPAs) to have local plans which reflect recent changes to the National Planning Policy Framework (NPPF) submitted by the end of June 2025 and adopted by December 2026. Government evidence on local plan progress shows that it takes 7 years, on average, to produce a local plan and that approximately 35% of LPAs have adopted a local plan in the last 5 years.

The GNLP and other local plan documents

12. On adoption, the GNLP will supersede the current JCS and the site allocations plans in each of the three districts. It consists of the strategy for growth, the site allocations to implement that strategy and a monitoring framework. Resulting changes to the adopted Policies Map are available [here](#).

13. Allocations will be made in a separate plan in the smaller villages in South Norfolk through the South Norfolk Village Clusters Housing Allocations Local Plan. The Diss, Scole and Burston area allocates sites through their Neighbourhood Plan.

14. As well as making new site allocations, the great majority of the undeveloped sites in the site allocation plans adopted around a decade ago are re-allocated through the GNLP.

15. The GNLP will not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle (NEGT), though in some cases additional allocations are made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, development management (DM) plans for the three districts and Neighbourhood Plans.

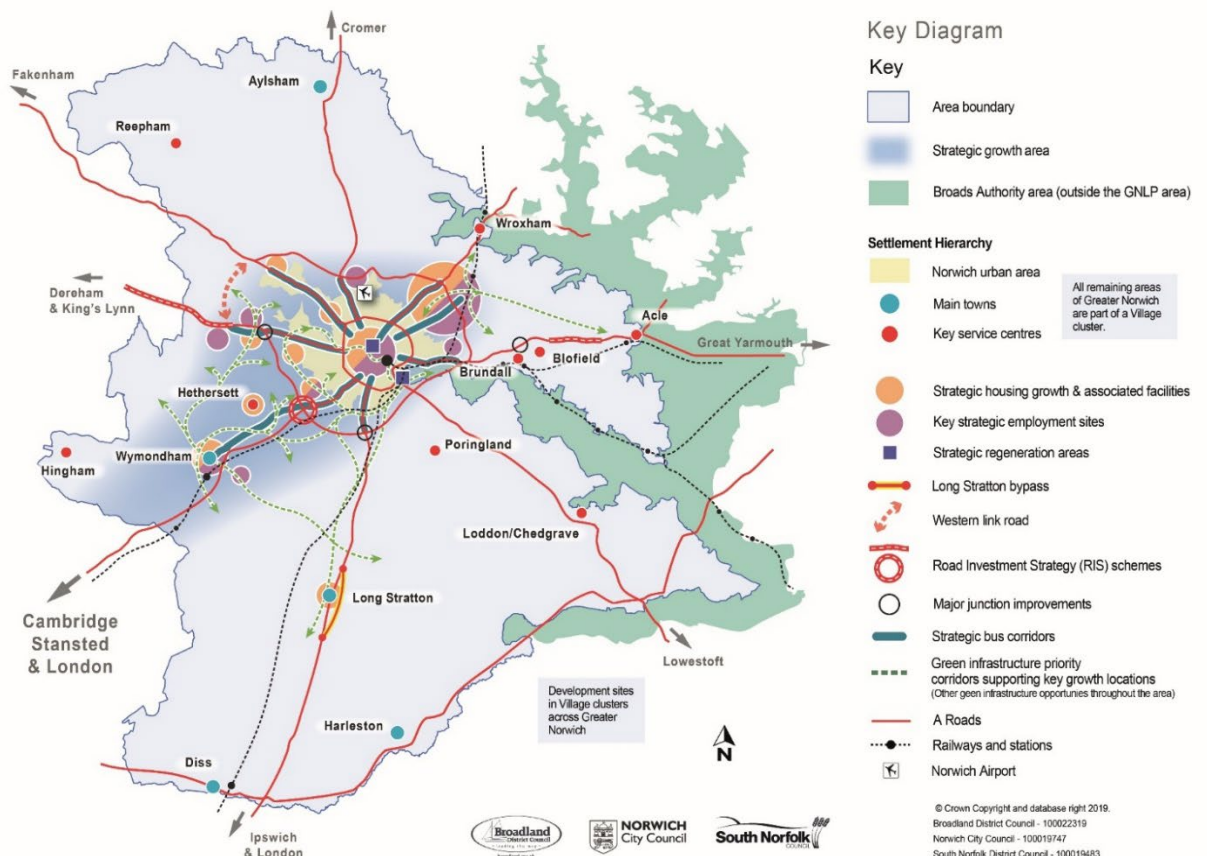
The GNLP Strategy

16. The growth strategy in the GNLP builds on and further develops the strategic approach taken in Greater Norwich in recent years and has been developed through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced, meets the plan's objectives and has now been endorsed by the government appointed inspectors through its examination.
17. The GNLP provides for up to 45,500 new homes, a jobs target of 33,000 jobs and 360 hectares of employment land from 2018 to 2038. It will ensure that Greater Norwich's housing and jobs needs will be fully met in a sustainable manner, supporting the growth of the post carbon economy, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.
18. This will be achieved through the strategy focussing the great majority of growth in and around the Norwich urban area and the fringe parishes, the towns and the larger villages, together with some growth in smaller villages to support local services as follows:
- 62% of the new homes will be in the Norwich urban area and the fringe parishes. These homes will be provided firstly through infill and regeneration sites (including East Norwich and Anglia Square which are identified as strategic regeneration areas) to maximise brownfield capacity. Despite recent events concerning Weston Homes, it is important that the Anglia Square allocation remains in the plan to assist in bringing the site forward for development. Secondly, urban extensions will play a significant role in delivering development. The largest urban extension is the Growth Triangle to the north-east of the city in Broadland, providing just over 10,000 homes to 2038, as well as jobs and infrastructure (including a secondary school). This now includes a new strategic allocation at White House Farm, Sprowston. Extensions to the north-west of the city at Taverham (a new strategic allocation), to its west at Easton, Costessey and Three Score and south-west at Cringleford provide other strategic housing growth locations.
 - 15% of the new homes will be in the main towns. There are new sites in Aylsham, Diss (partly through its Neighbourhood Plan), Harleston and Wymondham, with no additional sites in Long Stratton.
 - 8% of the homes will be in the key service centres (new sites are allocated in Acle, Blofield, Hingham and Loddon).
 - 9% of the homes will be in the village clusters covering the remaining rural areas of Broadland and South Norfolk. These sites will provide growth to meet local needs and support local services.

- 6% of the homes will be provided by windfall development.
19. The strategy includes 360 hectares of employment land at strategic sites (at Norwich City Centre, the Norwich Airport area, Browick Interchange Wymondham, Longwater, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park, Hethel and the Food Enterprise Park at Easton/Honingham). Allocations will also provide smaller sites with local job opportunities.
 20. The strategy includes a strategic growth area promoting Greater Norwich's economic strengths and sectors and linking via the Cambridge Norwich Tech Corridor to other regional and national growth corridors centred on Cambridge. The increased focus on the strategic growth area defined in the GNLP assists consideration of future strategic approaches, potentially including a new settlement or settlements.
 21. This approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retailing, leisure, entertainment and cultural activities, and the Norwich Research Park (NRP) for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.
 22. The strategy also promotes the protection and enhancement of the built and natural environment and local landscapes. This is done through the further development of the green infrastructure network and the retained strategic focus on continued protection of river valleys and strategic gaps.
 23. The GNLP promotes a pro-active approach to housing delivery through only allocating housing sites where a reasonable prospect of delivery has been evidenced. The plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 11% more homes than "need", should they be required to offset any non-delivery. Additional opportunities will be provided through windfall development.
 24. As such, the proposed strategy offers the opportunity to strengthen Greater Norwich's role as a key part of the national economy. Economic growth in Greater Norwich is set to be in key sectors that will assist in the national and international adaptation to a post carbon economy, including in plant sciences and high value engineering.
 25. Taken together, these measures will ensure that housing needs to 2038 will be fully met in sustainable manner, supporting the growth of the post carbon economy in Greater Norwich and more widely, assisting in tackling climate

change and protecting and enhancing the many environmental assets of the area.

26. The GNLP Strategy is summarised in the plan's Key Diagram below.



Key points on GNLP content for Norwich

27. GNLP Policy 1 provides the overall growth strategy for the area and Policy 7.1 the strategic policy for Norwich and its fringe areas in Broadland and South Norfolk. These are supported by site specific allocations.

28. As set out above, Norwich and its fringe will be the area's main focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions (mainly outside the Norwich City Council area) and redevelopment to support neighbourhood renewal.

29. The Norwich City Council area will provide around a quarter (around 10,725) of the new homes for Greater Norwich between 2018 and 2038. The plan allocates two Strategic Regeneration Areas (SRAs) at East Norwich and the North City Centre (focussed on Anglia Square), the remainder of the strategic urban

extension at Three Score, 16 sites for mixed use development including housing and 16 sites for housing development (see annex 2 for the Norwich site allocations). This approach maximises brownfield capacity in the city.

30. Employment growth is mainly focussed on strategic employment sites which are all in the strategic growth area. This includes sites in the Cambridge Norwich Tech Corridor (e. g. the Norwich Research Park which includes UEA). Norwich city centre will provide for expansion of office, digital and creative industries and leisure uses on several mixed-use sites. Norwich Airport will provide for aviation related and wider employment uses. There are expanded employment opportunities and expanded employment sites in smaller industrial areas such as Hurricane Way. The plan's employment strategy will place the focus on low carbon, high growth economic sectors including health research, agri-food, high value engineering and ICT/digital. Growth of these sectors will help Greater Norwich to play a key role nationally and internationally in assisting the transformation to a post carbon economy.
31. Norwich city centre's strategic role as the key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high density mix of employment, housing, leisure and other uses. Intensification of uses will be supported within the city centre to strengthen its role as a main regional employment, retail, cultural and visitor centre, providing a vibrant and diverse experience for all.
32. The plan has a major focus on regeneration. It provides for high density development of around 3,000 homes and 4,100 jobs to 2038 at the sustainable mixed-use quarter, the East Norwich SRA. Development will be guided through a masterplan covering a broad range of issues including transport and community infrastructure, local retailing and sustainable energy supplies. The plan also provides for over 1,600 homes in the Northern City Centre, along with a new Large District Centre at Anglia Square. In addition, the plan includes brownfield development sites elsewhere in the city centre. Smaller brownfield sites will support neighbourhood-based renewal, with densities highest in the most accessible locations. The site allocations within Norwich are listed in annex 2 of this report.
33. Development at the UEA will cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and its limited expansion.
34. Enhancements to the green infrastructure network will include links to and within the Wensum and Yare Valleys, the Marriott's Way and Mousehold Heath to provide links within the city and out to the open countryside, along with local networks. The critical environmental issues related to nutrient neutrality and visitor pressure on internationally protected habitats will also be addressed by the plan.

35. The plan sets the affordable housing requirement at 33% for the majority of Greater Norwich and 28% in the city centre due to higher development costs. The policy allows for flexibility over this requirement where a viability assessment can show that there are exceptional site-specific circumstances. The affordable housing should generally be provided on-site and there is also flexibility over tenure - current evidence shows a higher social rented requirement in the city.
36. Work on design codes will be progressed separately by Norwich to Broadland and South Norfolk. Work is ongoing on a guidance note on Purpose Built Student Accommodation (PBSA) to support policy 5 on homes, on a Supplementary Planning Document (SPD) on Biodiversity Net Gain to support policy 3 and on the East Norwich Masterplan SPD to support policy 7.1 and the site allocations at East Norwich.

GNLP Plan making Stages

37. The publication of the inspectors' report is the end of the GNLP's examination. The independent planning inspectors, who are appointed by the Planning Inspectorate on behalf of the Secretary of State, have assessed the soundness of the submitted plan through its examination.

38. Plans are 'sound' if they are:

- Positively prepared – i.e. it provides a strategy which, as a minimum, meets the area's objectively assessed needs and is informed by agreements with other authorities;
- Justified – it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters as evidenced by a statement of common ground;
- Consistent with national policy – it enables the delivery of sustainable development in accordance with national policies.

39. In line with regulatory requirements, the following stages have been undertaken in producing the GNLP:

Stage		Dates
Call for Sites		May to July 2016
Regulation 18 Preparation Stage		
Stage A	Growth Options and Site Proposals consultation	January to March 2018
Stage B	New, Revised and Small Sites consultation	October to December 2018
Stage C	Draft Plan Consultation	January – March 2020

Regulation 19 Publication Stage	
Pre-submission Draft Plan for representations on soundness and legal compliance	February – March 2021
Submission and Examination Hearings	
Submission to the Secretary of State	July 2021
Public Examination Hearings	February 2022 – July 2023

Examination Hearings

40. The hearings were divided into 5 sections:

- Parts 1 and 2 in February and March 2022 covered the strategy and site allocations.
- Part 3 in July 2022 was on the East Norwich Strategic Regeneration Area.
- Part 4 in March 2023 was on Nutrient Neutrality and Housing (specifically the trajectory for the delivery of homes).
- Part 5 in July 2023 was on Gypsy and Traveller needs and site allocations.

Inspectors' Letter

41. A letter from the inspectors was received on August 9th 2023. It is available on the [GNLP website](#) . It showed that the inspectors were generally content with the plan, but that a number of policies, largely relating to site allocations and housing delivery, would require main modifications to the 2021 submitted version of the plan which was the subject of the examination.

Main and Additional Modifications

42. Almost all local plans require main modifications to be made to them.

43. The main modifications were subject to consultation between October 25th and December 6th 2023. Consultation feedback was received from 67 respondents who made 257 individual representations. Many of the responses did not raise soundness issues and some comments only focussed to a limited extent on the main modifications, instead returning to issues already addressed through the examination, such as objecting to specific site allocations or requesting the inclusion of sites not allocated in the plan.

44. The Inspectors took note of the partnership's view on the consultation comments, along with the other comments made, in concluding on the modifications that are needed to make the plan sound. In this light, the Inspectors have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. Where the Inspectors' feel it is appropriate, their report references their response to specific soundness issues raised.

45. Additional modifications, mainly to supporting text rather than policies, have also been made. These are largely updates and clarifications which do not relate to

the soundness of the plan. They do not form part of the inspectors' examination of the plan and were available for reference rather than being part of the main modifications consultation. They include:

- Factual updates to supporting text, especially in the spatial profile e.g. new census data.
- References to changes in national policy e.g. the Levelling Up and Regeneration Act (LURA) and nutrient neutrality requirements.
- Progress on infrastructure schemes.
- National targets for reduction in greenhouse gas emissions.
- Removal of footnotes and replacement with references in text where required.

46. Further factual updates have been made to the additional modifications to reflect the final outcome of the plan's examination and the passage of time.

47. Taking account of the examination hearings and the consultation feedback, the modifications to the plan which they have concluded are necessary to make the GNLP sound have been included in the Inspectors' Report.

The Inspectors' Report

48. The inspectors' report concludes that with the specific main modifications, the plan satisfies legal requirements and meets the criteria for soundness in the NPPF. However, the councils can only adopt the plan if they incorporate the modifications that the inspectors view as necessary to make the plan sound. Consequently, the councils must now consider whether or not to adopt the plan in the light of the inspectors' report and recommendations.

49. The inspectors' report in annex 1 begins with a Non-Technical Summary, an Introduction and a section providing the context for the plan. The Non-Technical summary of the main modifications requires:

- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
- Amending Policy 7.5 so that it relates solely to self/custom build housing;
- Deleting Policy 7.6 for new settlements, with text in the plan pointing to a review of the Local Plan assessing options for longer term growth which may include the potential for a sustainable new settlement or settlements;
- Deleting the Costessey Contingency Site allocation;
- Deleting those site allocations which are not justified;

- Amending site allocation policies to remove ambiguity and clarify development requirements;
- Allocating sites for Gypsy and Traveller needs;
- Updating the housing supply figures and housing trajectory to reflect the evidence. The conclusion to the Inspectors' Report confirms that a five-year housing land supply for the Plan area has been demonstrated and this supply will not need to be updated annually;
- Replacing the monitoring framework;
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

50. The report then addresses legal compliance concluding that the plan meets all legal requirements. Specifically, the report states that:

- The Inspectors have had due regard to the Equalities Act through the examination, including their consideration of the allocation of Gypsy and Traveller sites to meet identified need, and policies relating to accessible and adaptable housing.
- The Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.
- The Sustainability Appraisal has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.
- The legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met. This work focuses on the impacts of the plan on internationally protected habitats. Policy requirements to protect those habitats in relation to visitor pressure and nutrient neutrality are included in policy 3 of the plan.
- Public consultation requirements for the plan were addressed in line with our Statements of Community Involvement and Local Development Schemes and meet the requirements of the national Regulations.
- The plan meets legal requirements in respect of preparing policies to address climate change.

Soundness

51. The Inspectors identified nine main “soundness” issues which were investigated through the examination and conclude that if the modifications they recommend are made:

- The Plan’s overall spatial strategy is based on robust evidence and is justified and effective. They consider that the spatial distribution across the Plan area is logical, it has been selected following consideration of reasonable alternatives and is an appropriate strategy as required by the NPPF.

- The housing requirement of 40,541 homes for the Plan period, based on the standard methodology using 2014 based projections, is justified and consistent with national policy. Also, the Plan's jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, are sound.
- The strategy for the economy and areas of growth is justified, effective and consistent with the evidence. This includes the approach taken on village clusters and a modified approach to small-scale windfall housing in policy 7.5 to place its focus on self and custom build housing. The Inspectors also conclude that a review of the Local Plan will need to assess options for longer term growth which may include the potential for a sustainable new settlement or settlements.
- The Plan policies relating to Sustainable Communities (policy 2 covering various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption) and Environment Protection and Enhancement (policy 3 covering the built, historic and natural environment, and modified to cover nutrient neutrality) are justified, effective and consistent with national policy.
- With a modification to clarify that strategic infrastructure schemes in policy 4 being progressed by other bodies including Norfolk County Council and National Highways, such as the Norwich Western Link, are not required to deliver any allocation, the Plan accords with the evidence and is justified and effective.
- The Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.
- The Partnership's approach to site assessment and selection for both general housing and Gypsy and Traveller accommodation is appropriate and is justified. Thus, the vast majority of the proposed site allocations in the submitted plan are retained. Paragraphs 53 to 55 below identify the limited number of submitted sites which are not included in the plan for adoption and those sites for which site capacity and delivery assumptions have been changed. The housing trajectory, now in Appendix 4 of the GNLP, has been amended to reflect these changes.
- The plan provides a 5-year supply of 12,632 homes for the Greater Norwich area, which is a supply of 5.77 years. It also demonstrates a 5-year supply of Gypsy and Traveller pitches.

- The revised Monitoring Framework, which now includes targets, triggers, and actions and is in a separate third document of the plan, provides a sound and effective basis for monitoring the Plan.

52. The following sites have been removed from the plan as the result of the examination:

- i. South of Le Neve Road, Marsham GNLP2143 for 35 homes due to impacts on the neighbouring church.
- ii. Mill Road Reedham GNLP3003 for 30 homes due to poor access.
- iii. The contingency site at Costessey.
- iv. Other housing sites removed by landowners:
 - Ber Street (CC2), Norwich for 20 homes.
 - Lower Clarence Road (CC13), Norwich for 45 homes
 - Ipswich Road Community Hub (R2), Norwich for 15 homes
 - Land north of Springfield Way and west of Dereham Road, Hingham for 20 homes.

53. With regard to the larger sites with planning permission, and those allocated in Area Action Plans, the Inspectors have made some alterations to the supply and delivery assumptions. There has been a loss of 250 dwellings at the Norwich RFU site as there was no evidence to support relocation plans during plan period, along with a loss of 180 dwellings at North Rackheath as some of the homes in the AAP are no longer considered likely to be delivered by 2038.

54. In addition, site capacity and delivery assumptions have been changed from the submitted plan on some sites. This includes East Norwich (3,000 homes are now assumed to be delivered in the plan period) and White House Farm, Sprowston, where there has been a loss of 660 dwellings from the delivery trajectory to 2038.

55. The Inspectors overall conclusion is that with inclusion of their recommended main modifications the plan is sound and *“the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan”*. This is an excellent outcome as due to recent changes to the NPPF, this 5-year supply will be fixed for 5 years on adoption of the plan.

Securing Plan Adoption

56. The publication of the inspector’s report enables the councils to proceed to adoption of the GNLP. It requires the main modifications to be included in the

adopted plan to make it sound. As stated above, these changes are binding - a plan can only be adopted with their inclusion.

57. The decision to adopt the plan must be made by each of the three councils. Full Council meetings are scheduled in each authority in March 2024. Adoption of the GNLP involves the publication of an adoption statement shortly after each authority adopts the plan. This is accompanied by the GNLP as amended by the inspectors' modifications, the inspectors' report, the sustainability appraisal, and the habitats regulation assessment. These are available from [here](#). An Environmental adoption statement will also be available.
58. Legal challenges can be made within 6 weeks of the adoption of a local plan. An application to the High Court can be made either on the grounds that the document is not within the appropriate power of the LPA, or that a procedural requirement has not been complied with.
59. Once the risk of legal challenge has passed, the production of the final online and hard copy documents to publication standard can be undertaken.

Conclusions

60. Overall, the inspectors' report is very positive, and the successful development of an updated joint strategy is a considerable success.
61. Adoption of the GNLP will allow us to implement evidence-based policies for our area through a plan which the partnership has invested considerable time and money in. While it has been a long process to get the GNLP to adoption, national data shows that the seven years taken is the average under the current local plans system.
62. The GNLP builds on our extensive experience of joint working to identify where growth and new infrastructure is needed from 2018 to 2038. Plan adoption will keep us at the forefront of joint planning nationally which will help us to attract investment into the area, including Government funding, especially for infrastructure and regeneration programmes. Only one other partnership, Central Lincolnshire, has adopted a review of a joint plan.
63. The plan will deliver high-quality homes, along with a broad range of new jobs and supporting infrastructure, including green infrastructure, roads, schools, health care facilities and broadband connectivity. The plan includes a range of policies which will ensure that the development is in the best locations to support our existing communities and to create thriving new communities, as well as making sure that development is well-designed, and is sustainable.
64. The councils' strategy for the distribution of the majority of growth in the strategic growth area focussed on the Norwich Urban Area and the Cambridge Norwich

Tech Corridor, with some growth also focussed at other levels of the hierarchy to support thriving communities and the retention of services, has been fully endorsed. This further develops the long-term strategic approach set through the JCS. It also allows for a future focussing of growth on new settlements if this is the path which the authorities choose to take in their next plan or plans.

65. Adoption of this coherent strategic plan will mean that Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.
66. Importantly, recent revisions to the NPPF mean that for 5 years after adoption of the plan, there will be no need to annually demonstrate a five-year land supply for Greater Norwich. This will significantly reduce the pressure to grant permissions for non-allocated housing sites that currently exists as there is not, at this point, a 5-year land supply. This further increases the benefits of having an adopted plan.
67. There could potentially be some very serious negative impacts associated with not adopting the plan. Firstly, the uncertainty created by not having an adopted strategy and not having a 5-year land supply would increase the prospect of speculative or inappropriate proposals being submitted, resulting in “planning by appeal”. Secondly, there is a very real threat of Government intervention for those LPAs which are not making sufficient progress on their plans to have an adopted plan in place by December 2026. Ten local planning authorities had the Secretary of State intervene in their local plan process in the last three months of 2023. Seven were required to update their Local Development Schemes to make clear when their plans are to be adopted, whilst three (Spelthorne BC, Erewash BC and West Berkshire Council) were instructed not to withdraw their draft plans from examination. It seems inevitable that there would be Government intervention if one or more of the Greater Norwich authorities were not to adopt the GNLP. Thirdly, given the amount of consultation the plan has gone through and the successful outcome of its examination, it is also possible that there could be a legal challenge to and significant resulting costs from non-adoption of the GNLP.
68. Having received a highly positive Inspectors’ Report endorsing the strategy and site allocations set out in our plan, and taking account of the significant benefits of adoption and the major difficulties that would be created through not following that path, the case for adoption is overwhelming.

Consultation

69. As set out in paragraph 39 above and in detail in the GNLP’s Statement of Consultation (available from section A8 of the GNLP core submission documents [here](#)), there has been extensive consultation on this plan.

Implications

Financial and resources

70. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget. The costs of adopting and publishing the GNLP are covered within existing budgets.
71. Progressing the GNLP through its examination is being met within the existing resources of the GNLP team and the annual budget committed to it by each of the partner authorities. Should the GNLP not be able to progress to adoption then it is likely that significant costs would be borne by the Council.

Legal

72. The preparation and content of a local plan needs to accord with a range of legal and regulatory provisions. Project assurance, including taking relevant legal advice, has been undertaken as part of the plan-making and examination process.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The plan encourages growth of vibrant and healthy communities with good access to jobs, services and facilities, helping to reduce disparities between the life chances of disadvantaged and other communities. New communities will be well-integrated with existing communities and will be safe and attractive places to live. An Equality Impact Assessment has assessed the impact of the local plan on the community and its potential to address socio-economic inequality.
Health, social and economic impact	Adoption of the GNLP will assist in addressing health, social and economic considerations as it supports sustainable housing and jobs growth and will support the delivery of infrastructure, including health care facilities.

Consideration	Details of any implications and proposed measures to address:
Crime and disorder	<p>This report has implications for the council's crime and disorder considerations in that new development is required to reflect best practice to deter crime through its design and layout. In addition, the supporting text in the plan advises planning applicants to contact Norfolk Constabulary for guidance on crime and safety issues.</p>
Children and adults safeguarding	<p>This report does not have any direct implications for the council's Safeguarding Policy statement.</p>
Environmental impact	<p>A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and a Habitat Regulations Assessment support the GNLP. The SA has explicitly considered the policies and sites allocated through the plan. The HRA has focused on nutrient neutrality and visitor pressure on internationally protected habitats.</p> <p>The GNLP's Climate Change statement sets out how the plan seizes the opportunities available locally to promote low carbon development and address climate change. This includes the location of development and its design, with policies reducing the need to travel, promoting water efficiency, sustainable energy provision and recycling, and requiring development to be adapted to the address the impacts of climate change, including flood risk. The plan has a particular focus on ensuring that new development provides biodiversity net gain and new green infrastructure (GI) as part of a wider GI network.</p>

Risk management

Risk	Consequence	Controls required
Since the plan has successfully been through examination and has been found to be sound subject to including the Inspectors' main modifications, risks relate to non-adoption of the plan	Non-adoption of the plan would lead to more speculative development in unplanned locations, potential government intervention in plan-making and would be likely to reduce both government and private investment in the area.	Such risks will be addressed by adoption of the plan.

Other options considered

73. All local planning authorities are required to produce a Local Plan. As there are clear benefits to working together with our neighbours in Broadland and South Norfolk to produce a joint plan, and the case for adoption is concluded in this report to be overwhelming, there are no realistic options to adoption of the GNLP.

Reasons for the decision/recommendation

74. The benefits of adopting the plan are set out in the conclusions section of the report above. Adoption of this coherent strategic plan will mean that Norwich and Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.

Background papers: None

Annex 1: Inspectors' Report



Report to Broadland District Council, Norwich City Council and South Norfolk Council

by Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI

Inspectors appointed by the Secretary of State

Date: 19 February 2024

Report on the Examination of the Greater Norwich Local Plan

The Plan was submitted for examination on 30 July 2021

The examination hearings were held:

1-10 February 2022, 1-10 March 2022, 6 July 2022, 22-23 March 2023, 25 July 2023.

File Ref: PINS/G2625/429/9

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Abbreviations used in this report

dpa	Dwellings per annum
dph	Dwellings per hectare
ENSRA	East Norwich Strategic Regeneration Area
Framework	National Planning Policy Framework
GIRAMS	Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy
GTAA	Gypsy and Traveller Accommodation Assessment
GTAAP	Growth Triangle Area Action Plan
Ha	Hectares
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
JCS	Joint Core Strategy
MM	Main modification
NSPF	Norfolk Strategic Planning Framework
Partnership	Greater Norwich Development Partnership
PPG	Planning Policy Guidance
PPTS	Planning Policy for Traveller Sites
SNVCHAP	South Norfolk Village Clusters Housing Allocations Plan
SA	Sustainability appraisal
SoCG	Statement of common ground
UEA	University of East Anglia

Non-Technical Summary

This report concludes that the Greater Norwich Local Plan ('the Plan') provides an appropriate basis for the planning of the 3 Council areas, provided that a number of main modifications [MMs] are made to it. Broadland District Council, Norwich City Council and South Norfolk Council working together as the Greater Norwich Development Partnership, have specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the Sustainability Appraisal and Habitats Regulations Assessment and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
- Amending Policy 7.5 so that it relates solely to self/custom build housing;
- Deleting Policy 7.6 for new settlements;
- Deleting the Costessey Contingency Site Allocation;
- Deleting those site allocations which are not justified;
- Amending site allocation policies to remove ambiguity and clarify development requirements;
- Allocating sites for Gypsy and Traveller needs;
- Updating the housing supply figures and housing trajectory to reflect the evidence;
- Replacing the monitoring framework;
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Greater Norwich Local Plan in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2023 (paragraph 35) (the Framework) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Greater Norwich Local Plan, submitted in July 2021 is the basis for our examination. It is the same document as was published for consultation in February 2021.
3. A revised Framework was published on 19 December 2023. It makes it clear that, under transitional arrangements, plans reaching Regulation 19 stage before March 2024 should be examined under the previous version of the Framework (dated September 2023). The examination of this Plan has therefore taken place under that version. References to the Framework in this report are to the previous September 2023 version, unless otherwise stated.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Councils requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Partnership prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks.
6. We have taken account of the consultation responses in coming to our conclusions in this report, and in this light, we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary we have highlighted these amendments in the report.

Policies Map

7. The Councils must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, it is a requirement to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Submission Policies Map Broadland, Submission Policies Map Norwich, Submission Policies Map South Norfolk as set out in the Greater Norwich Local Plan Pre-Submission Draft Strategy and Draft Sites Plan.
8. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
9. These further changes to the policies map were published for consultation alongside the MMs on the Greater Norwich Local Plan in October 2023.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Partnership will need to update the adopted policies map to include all the changes proposed in the Plan and the further changes published alongside the MMs.

Context of the Plan

11. The Plan has been produced jointly by Broadland District Council, Norwich City Council and South Norfolk Council working together as the Greater Norwich Development Partnership. This is a formal partnership arrangement overseen by a Board comprised of representatives from the three Councils plus Norfolk County Council and the Broads Authority.
12. The Plan will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk ('JCS') and the Site Allocations Plans/DPDs for each of the three districts. Allocations in the smaller villages in South Norfolk which will be covered by the South Norfolk Village Clusters Housing Allocations Plan ('SNVCHAP') when it is adopted. It is expected to be submitted for examination in 2024. The now made Diss, Scole and Burston Neighbourhood Plan also allocates sites for development.

13. The following plans are to be carried forward and used in conjunction with the Greater Norwich Local Plan; the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan (2016); the Long Stratton Area Action Plan (2016); the Wymondham Area Action Plan (2015); the Broadland Development Management Policies Document (2015); the Norwich Development Management Policies Document (2014); and the South Norfolk Development Management Policies Document (2015).
14. The Plan area has a population of around 409,000 just over half of whom live in the Norwich urban area. Norwich is the regional capital, an economic hub and an historic city. The Plan area extends to cover the many market towns, villages and hamlets in this part of the County along with many rich natural and historic assets. The Broads National Park lies immediately to the east of the Plan area.

Public Sector Equality Duty

15. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination such as the allocation of Gypsy and Traveller sites to meet identified need, and policies relating to accessible and adaptable housing.

Assessment of Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires that we consider whether the Councils have complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
17. The Plan has been prepared by the three authorities working together as part of the Greater Norwich Development Partnership within the provisions set out in the Norfolk Strategic Planning Framework ('NSPF'). Evidence has been produced jointly across the three districts and wider areas, building on previous joint working as part of preparing the JCS. As a joint plan there has clearly been effective joint working between the three local planning authorities together with the other GNLP Board member authorities of Norfolk County Council and the Broads Authority.
18. The Partnership has submitted evidence, including numerous statements of common ground with prescribed authorities. Strategic matters have been identified and the Duty to Co-operate Statement of Compliance sets out how these have been consulted on and worked on together with prescribed bodies and other authorities, agencies and organisations across Norfolk and Suffolk. These relate to housing, economy, infrastructure (education, transport, and utilities) health, natural environment, historic environment, and climate change/energy efficiency.

19. We are satisfied that where necessary the Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

Sustainability Appraisal

20. A Sustainability Appraisal ('SA') report of the Regulation 19 version of the Plan was published in January 2021, and was the culmination of work undertaken since 2017. Three further SA Addendum reports were published in September 2021, December 2021 and June 2022. The first of these was published in response to a representation made at Regulation 19 stage and re-assessed the original seven spatial options in light of the increased housing requirement. The second addendum was undertaken at our request and modelled both smaller and minimal housing supply buffers as 'reasonable alternatives'. The third SA addendum updated some factual information and also addressed omissions that had been identified. The SA was also updated to assess the MMs. This final iteration of the SA identifies that the MMs to Policy 2 and Policy 7.5 would lead to minor negative effects for SA objectives compared to the submission version of the Plan. Regarding Policy 2 this relates to the deletion of wording we considered to be ineffective, which has led to a minor change to 1 SA objective. In terms of Policy 7.5 it relates to an assumption that the modifications to this policy will lead to a greater loss of greenfield land than the submission version of the policy. However, we consider that to be unlikely given that the policy now relates solely to self and custom build housing. The assumed supply contribution from this policy also remains unaltered at 800 dwellings over the Plan period. Moreover, the SA does not consider these potential adverse effects to be significant. Other strategy policies either score the same or slightly better against the SA objectives than in the submission version of the Plan.
21. Throughout the production of these documents a consistent framework has been used to assess the emerging plan. This framework was developed following a scoping and consultation exercise and is relevant and appropriate to the scope of the plan, local context and national policy. Assessment of the Plan against this framework was undertaken, and we are satisfied that the overall approach is acceptable.
22. The SA has assessed a range of housing and growth options. Six options for distributing growth were assessed in the SA at Regulation 18a stage, and a preferred option incorporating elements of each of these was devised at Regulation 18c stage. The total quantum of development envisaged when the six original options were assessed was very similar to at Regulation 19 stage, with a total housing provision of 48,465 dwellings. Whilst the net growth envisaged was lower (7,200 dwellings compared to 10,704 at Regulation 19 stage), and the Plan period was slightly different (2015-2036 compared to 2018-

36), those differences do not invalidate the original assessment in our view. In this regard, the SA is a high level document that seeks to assess the broad implications of different spatial distributions of development. In any case, the addendum published in September 2021 provided a summary of the performance of each of the original 6 options, as well as the preferred option, which illustrates how these options perform. It was unnecessary for this work to identify potential alternative sites given the high level nature of the SA.

23. It is argued that other spatial options scored better, or should have scored better, than the preferred option selected by the Partnership. However, the purpose of the SA is to inform the preparation of the Plan, and each SA objective could be given different weight in different circumstances. Whilst the scoring assigned to some of the options has been questioned, the judgements that have been made are within the bounds of reasonableness in our view.
24. A second SA addendum was undertaken at our request and modelled both 10% and 1% buffers to the Local Plan housing supply. The purpose of this exercise was to inform both the discussions at the hearings, and our deliberations in relation to the strategy. Following the hearings and the publication of our initial findings, this buffer has reduced to 11%, and the SA addendum has assisted in assessing the implications of this. Once again, given the high level nature of the SA, it was unnecessary for the addendum to have identified which sites would be removed from the Plan were a lower buffer to have been adopted at Regulation 19 stage.
25. It is also asserted that the site assessment process underpinning the Regulation 18c version of the Plan did not take the findings of the 2020 SA into account. However, even if that were the case, this was an early version of the Plan that preceded the submitted Regulation 19 version. Final decisions about the composition of the Plan had not been made at that stage, and the Regulation 18c plan is not the version which is the subject of this examination. In this regard, the Regulation 19 version of the Plan was clearly informed by the 2021 SA. Whilst many of the “preferred sites” identified in the Regulation 18c version were subsequently carried forward into the Regulation 19 Plan, that is unsurprising given that they are amongst the most sustainable alternatives, as has been confirmed in various iterations of the SA and in other work. Moreover, the SA is not intended to be the sole mechanism by which proposed allocations are selected, and the Partnership were entitled to use the approach set out in the site assessment booklets for that purpose.
26. The assessment of potential housing sites with regard to climate change impacts assumed that increases in emissions would be directly linked to the new population arising from the development. In this regard, a development leading to an increase in carbon emissions across the Plan area of between 0.1% and 1% was assumed to have a negative effect, whereas more than a 1% increase was assumed to have a major negative effect. Whilst this approach

was criticised in some representations, it reflects that larger developments will generally be associated with higher emissions. The locational accessibility of individual sites, which has implications for emissions arising from private cars, is also assessed under SA Objective 12 – Transport and Access to Services.

27. It is argued that the SA should have benchmarked reasonable alternatives against the national target of achieving net zero carbon emissions by 2050. However, that is not a requirement of the Framework or the Planning and Compulsory Purchase Act 2004 and achieving this target will depend on a range of factors, most of which are beyond the scope of the planning system. The testing of climate change impacts within the SA has been undertaken on a consistent and reasonable basis and is adequate in our view.
28. The assessments of potential site allocations within the SA were largely based on secondary data sources, and each site was assessed using a consistent methodology. Technical reports and other evidence submitted by representors were not taken into account in the SA, as these were not available for every site, and so would have led to inconsistencies had they been considered. This approach is appropriate in our view. Whilst the site assessment booklets took a different approach to the assessment of certain matters (such as landscape) that is unsurprising given the high level, desktop nature of the SA assessment. In this regard, the site assessment booklets also considered other sources of information, including Officer assessments based on site visits. There was no legal failure in utilising this approach.
29. Appendix E of the January 2021 SA sets out a 'post-mitigation assessment' which considers how mitigating factors could help to avoid or reduce any site impacts identified at the pre-mitigation stage. This assessment incorporates the impact of Plan policies, including the site-specific policies which are set out for allocations in part 2 of the Plan. Whilst it is argued that this approach is inconsistent, as it affords the benefit of the site-specific policies to proposed allocations, that is in the context of the need to assess the Plan that has been submitted. There is no legal flaw in this regard.
30. Overall, we consider that the SA has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.

Habitats Regulations Assessment

31. A Habitats Regulations Assessment ('HRA') of the Regulation 19 version of the Plan was published in July 2021, and followed HRAs of earlier versions of the Plan. Having undertaken an appropriate assessment, it concluded that subject to the adoption of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy ('GIRAMS'), and the monitoring of progress towards water recycling improvements, there would be no adverse effects to the integrity of

any European site. The GIRAMS strategy has subsequently been implemented by Local Planning Authorities throughout Norfolk, including the Partner Authorities, and is supported by Natural England. The Greater Norwich Water Cycle Study was also subsequently finalised in March 2021.

32. An updated HRA was published in March 2023, which assessed a proposed modification to Policy 2 regarding Nutrient Neutrality. This found that subject to the adoption of this modification, there would be no adverse affect upon the integrity of any European site. A HRA addendum was also published in May 2023, which assessed the proposed Gypsy and Traveller allocations. A further HRA addendum was undertaken in relation to the MMs, which also found that there would be no adverse affect upon the integrity of any European site.
33. Focussing on the legal requirement at this stage, the HRA reports conclude, overall, that the Plan provides a sufficient policy framework to ensure that there will be no adverse effects on the integrity of European protected sites, either alone or in-combination with other plans or projects. We are therefore satisfied that the legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met.

Other

34. The Plan has been prepared in accordance with the Local Development Scheme ('LDS') for Norwich City [A17], South Norfolk [A16] and Broadland [A15]. Each LDS was updated in January 2023 to reflect the most recent timetable for the examination and adoption of the Plan.
35. The Partnership has confirmed that the Plan will supersede the policies in four existing development plan documents. In accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 these are set out in Appendix 3 of the Plan, along with a list of development plan documents which will remain, and which will be used alongside the Plan for decision making purposes.
36. Consultation on the Plan and the MMs was carried out in compliance with the respective Statements of Community Involvement [A18.1 A18.2, A19, A20.1 and A20.2]. These included temporary arrangements in response to Covid 19 guidance. The preparation of the Plan also met the minimum consultation requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
37. A number of site allocations were either introduced or significantly expanded (in terms of site area / capacity) between Regulation 18c stage and the submitted version of the Plan. However, there was an opportunity to comment on these at Regulation 19 stage. In this regard, it is not uncommon for sites to be added,

removed, or adjusted between Regulation 18 and Regulation 19 versions of a local plan. This approach does not raise any legal or soundness concerns.

38. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
39. Several Plan policies will help to ensure that the development and use of land contribute to the mitigation of, and adaption to, climate change. In addition, the spatial focus of the Plan on developing sites within the Norwich urban area and in the main towns and centres, is intended to reduce the need to travel. In particular the allocation of the large site at East Norwich provides an opportunity for a major new housing and business quarter for the city well linked to public transport and the city centre. The Plan includes a specific statement on Climate Change setting out how the Plan relates to measures identified in Royal Town Planning Institute and Town and Country Planning Association practice guidance. Whilst this is not statutory, it does help to show how addressing climate change runs through key elements of the Plan.
40. The Plan does not address wider climate change issues that are outside the scope of the planning system. Representations made at the examination argue that the Plan does not go far enough in terms of dealing with issues such as carbon emissions and developing a net zero strategy approach. However, we consider that the Development Plan, taken as a whole, accords with the statutory objective set out in Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 and with the provisions of the Framework in respect of preparing policies to address climate change.
41. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

42. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified nine main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion, or allocation in the Plan.

Issue 1 – Is the Plan’s overall spatial strategy based on robust evidence and is it justified and effective?

The Plan Period

43. The Plan covers the period 2018 to 2038. It was submitted for examination in July 2021. It is likely that adoption will take place in March 2024. This delay was largely due to the extension of the examination period as a result of further work and consultation undertaken by the Partnership on potential Gypsy and Traveller site allocations. Therefore, on adoption, the Plan period will be marginally less than the minimum 15 years which the Framework expects strategic policies to cover. However, extending the Plan for an additional year would involve a re-assessment of the housing requirement and site delivery evidence which would prolong adoption even further. In the circumstances and recognising that the Plan will need to be reviewed within 5 years, and that the provisions in the Framework are non-statutory, we consider that the Plan period to 2038 is sound and no modification is therefore necessary.

The Vision for Greater Norwich 2038

44. The plan sets out a Vision for Greater Norwich in 2038. It promotes growth making the best of Greater Norwich’s distinct built, natural and historic assets. It sets out the vision in relation to the economy, communities, homes, environment and delivery, and accords with the evidence. It is a soundly based vision and one from which the Plan objectives and policies flow.
45. The Plan sets out six objectives which together with the vision provide the context for the policies.

Strategic Policies

46. The Plan is divided into two separate documents relating to the Strategy and the Sites. All of the policies in the Strategy document are strategic. These are necessary to address the strategic priorities of the area and this approach accords with the Framework. There are a number of strategic site allocations in the sites part of the Plan. **MM21** brings these sites together within the Plan so that it has a logical structure which is effective.

The Growth Strategy

47. The housing requirement of 40,541 for the Plan period has been identified based on the standard method using 2014-based household projections. This figure forms the housing requirement set out in Policy 1. The supporting text to the Plan sets out that this is a housing target. However, to be effective, the

wording within the supporting text needs to make it clear that this is a requirement. **MM1** and **MM3** address this.

48. The Growth Strategy accords with the vision of focusing development within Norwich and the Cambridge-Norwich Tech Corridor. The distribution of growth broadly follows the settlement hierarchy of the Norwich urban area and the fringe, main towns, key service centres and village clusters. It seeks to promote the regional function of the City and to maximise opportunities for brownfield and accessible greenfield development. It follows a logical hierarchy with the City of Norwich at the top, then the main towns of the Plan area, then the key service centres which serve their rural hinterlands and then the village clusters. It accords with the vision in this Plan and builds on strategic approaches already set out and being implemented through the JCS. It has been arrived at through consultation and consideration on six broad spatial options including concentration and dispersal.
49. Not all the main towns are proposed to have similar levels of growth, and even within the Cambridge-Norwich Tech Corridor there are variations in approach. Nevertheless, the strategy is based on firm evidence including topic papers and site assessment appraisals for each main town. Some settlements have more constraints than others. In some settlements, there is a significant pool of extant planning permissions which has been a factor in decisions around the need and scope for new allocations. Hence not every town has the same amount of growth to be met through allocations in this Plan.
50. We consider that the general approach to the spatial distribution across the Plan area is logical, and supported by the evidence and is justified. It has been selected following consideration of reasonable alternatives. It is an appropriate strategy as required by the Framework.
51. In order to meet the need for around 40,541 homes the Plan allocates new sites, re-allocates some sites allocated in existing plans, and relies on delivery from sites with planning permission, windfalls, and smaller sites which may come forward in accordance with policies in this Plan.
52. Tables 6 and 7 of Policy 1 need modifying for effectiveness to refer to the Plan requirement and to make consequential changes to a number of figures and descriptions which are to be modified as set out elsewhere in this report. **MM2** and **MM5** address these matters.
53. The Housing Growth Locations map sets out the main areas of housing growth. This map needs to be updated for effectiveness to reflect the changed numbers for each area as a consequence of other policy changes and delivery assumptions set out in the Plan. **MM6** makes this change.

54. We have found that the housing supply is lower than the 49,492 set out in the submitted version of the Plan. This is explained in the appropriate sections of the report, but it is primarily due to revisions to site delivery assumptions. The vast majority of the site allocations in the Plan are sound, but the evidence before us indicates that for many sites a later start date should be assumed, or a lower annual delivery rate, or both.
55. We therefore consider that the provision in the Plan would be around 45,041 homes for the period 2018 to 2038. This represents a supply buffer of around 11% above the housing requirement figure. Whilst this is below that set out in the submitted Plan, we consider it to be an appropriate supply buffer for the reasons set out under Issue 8 of this report.
56. The modifications necessary to make Policy 1 sound are set out in **MM7**.

Conclusion

57. Subject to the MMs identified above, the Plan's overall spatial strategy is based on robust evidence and is justified and effective.

Issue 2 – Have the identified housing and employment needs and requirements been positively prepared and are they justified and consistent with national policy?

Housing Need and Requirement

58. The Plan identifies a housing need figure of 40,541 based upon the standard methodology using 2014 based projections. This follows the approach set out in the Planning Policy Guidance ('PPG'). Based upon the evidence before us, we do not consider that there are exceptional circumstances to depart from using the standard method for this Plan.
59. The standard method is the minimum starting point for assessing local housing need. However, based on the evidence before us and having regard to the factors set out in the PPG, we do not consider that there needs to be an uplift to this figure. We consider that whilst the Partnership has growth ambitions such as set out in the City Deal, these do not justify an uplift. For example, the housing growth element of the City Deal refers to the housing sites within the North East Norwich Growth Triangle, sites which are already committed or set out in this Plan or other adopted Area Action Plans.
60. The Plan identifies a significant supply buffer over and above the housing requirement. It states that this higher supply is to assist with the growth ambitions of the Norwich area and to recognise higher rates in the 2018 based

projections. The Partnership has effectively made provision for an oversupply against the requirement given these factors.

61. For these reasons we consider that the housing requirement of 40,541 homes for the Plan period is justified and consistent with national policy.

Employment Need and Requirement

62. The Plan proposes to allocate around 360 hectares of employment land to aid the delivery of 33,000 additional jobs and to support key economic sectors over the Plan period. The figure of 33,000 jobs was originally based on the 2017 Greater Norwich: Employment Land Assessment, which used figures derived from the East of England Forecasting Model. Subsequent modelling undertaken in the Employment Land Assessment Addendum (2020) largely supports this figure, including when factoring in an uplift for higher growth in certain sectors. Whilst this uplift was relatively modest (at around 500 jobs) it uses an approach that we consider to be robust.
63. Reference is also made in the representations to an East of England Forecasting Model run that was published in August 2020, which projected a broadly similar level of jobs growth (around 29,700 jobs). However, this is based on data from 2018 and 2019 and so did not consider the impact of Covid 19. Whilst there is a different profile of jobs growth between these forecasts, that is to be expected given that they were derived from separate models using data from different years. In this regard, the 2020 East of England Forecasting Model run does not call into question the jobs target in the Plan in our view.
64. Our attention has been drawn to the fact that the local economy has grown significantly since 2011, adding around 29,000 jobs since then. However, that reflects in part a bounce back from the 2007-2008 financial crisis and subsequent recession. In this regard, the Partnership stated in the hearings that a return to the 2006 jobs level was only achieved between 2016-18 in the Plan area. Moreover, whilst jobs growth between 2015 and 2018 was higher at around 5,000 per annum, that represents a relatively brief snapshot that is not comparable to the longer-term analysis that has informed the jobs requirement.
65. The proposed 360 hectares of employment land represents a significant over-allocation of land to meet the requirement for 33,000 jobs. However, this headline figure includes a number of sites which are already partially built out. Moreover, this amount of land is justified in our view to provide choice, allow for churn and windfall losses to other uses, and to facilitate the growth of certain sectors. It would also help to support a higher rate of growth should this transpire. Each of the proposed allocations, the majority of which are carried forward from previous plans, have also been assessed for their ongoing suitability for allocation in the 2017 Employment Land Assessment.

66. The Plan has identified a significant range of employment sites, of various sizes and locations, to support the Plan's jobs target. Where a specific company's site and locational requirements necessitate the identification of an alternative site, that is a matter for the development management process.
67. For the above reasons, we consider the Plan jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, to be sound.

Conclusion

68. Subject to the modifications set out above, the Plan identifies housing and employment needs and requirements that are justified, have been positively prepared and accord with national policy.

Issue 3 – Is the strategy for the economy and areas of growth justified, effective and consistent with the evidence?

69. The strategy for the economy and areas of growth flows from the spatial strategy set out in Policy 1 of the Plan. Its detail in relation to specific areas is set out in Policies 7.1-7.4 which then relate to the individual site allocations set out later in the Plan. Policy 6 also deals with the overall approach to the economy and town centres. This general approach is justified and effective.

Policy 6 - The Economy

70. This policy aims to support economic growth in the Plan area and sets out the overall approach to employment development, tourism, leisure and cultural industries, and town centres. Modifications to the policy wording are necessary to provide appropriate support for the development of rural enterprises in line with national planning policy. Modifications to the 'Town Centres' section of the policy are also necessary for consistency with national policy, to control the proliferation of town centre uses in out-of-centre and edge-of-centre locations, and to delete an unjustified requirement that prevented the loss of commercial premises. Finally, changes to the 'Local Retail and Leisure' section of the policy are necessary for clarity and effectiveness. **MM12** makes these changes.

Policy 7.1 - The Norwich Urban Area including the Fringe Parishes

71. This policy sets out the spatial framework for the Norwich Urban Area and the fringe parishes. It flows from the settlement hierarchy set out in Policy 1.
72. The focus on Norwich and the fringe parishes for jobs, homes and service development accords with the evidence and the spatial strategy. It enhances Norwich's role as the regional centre and aims to promote major regeneration, strategic and smaller scale extensions and neighbourhood renewal. The policy

seeks to focus development in the city centre, at the strategic regeneration site at East Norwich, along with strategic urban extensions. The approach is therefore one of promoting development in the centre of the city but complementing it by the ENSRA and new and rolled forward allocations on the fringes of the urban area, most of which are greenfield. This distribution helps to avoid any over concentration of housing in the city centre and provides choice in the housing market. This approach is justified based on the evidence.

73. A number of modifications to the policy are required as a result of changes made elsewhere in the Plan. For example, the numbers referred to in the housing table need to be modified as a result of changes to site allocations, expected capacities, and likely delivery timescales, which are referenced elsewhere in this report. A further modification is needed to the 'Economy' section to clarify where and under what circumstances the loss of existing office floor space will be resisted in Norwich city centre. In this regard, an Article 4 Direction came into effect in February 2023 that withdraws permitted rights from certain office buildings to change use to residential. Listed buildings do not benefit from this permitted right and so are not subject to the Article 4 Direction. Accordingly, the policy wording also seeks to restrict changes of use of listed office buildings that are of importance to the city centre economy.
74. Further changes to the 'Retail and Main Town Centre Uses' section of the Policy are necessary to clarify that it applies to the primary and secondary retail areas and large district centres within Norwich city centre, which will be the focus of any additional retail growth. These changes are necessary to accord with the sequential approach set out in the Framework.
75. In respect of the 'Leisure, Culture and Entertainment and the Visitor Economy' section of the policy, modifications are necessary to delete the restriction of such uses to the defined City Centre Leisure Area only, as this is inconsistent with the Framework. Further modifications to this section are necessary for reasons of effectiveness and to clarify the circumstances where leisure use proposals will be acceptable.
76. A section of the policy is concerned with the ENSRA site, which is subject to a separate site-specific policy in the Plan. Therefore, to be effective, Policy 7.1 needs to be modified such that it relates to key principles only and not to repeat the detail set out in the site-specific policy. Reference to the Costessey Contingency Site also needs to be removed as a consequential change to the separate modification to delete Policy GNLP0581/2043.
77. In light of representations to the main modification consultation, a reference to green infrastructure strategy updates within the final sentence of each of the Policies 7.1-7.4 is necessary for effectiveness and to remove any ambiguity.

None of the additional changes suggested in the MM consultation are necessary for soundness.

78. **MM13** addresses the above points and is necessary for the reasons set out.

Policy 7.2 - The Main Towns

79. Policy 7.2 sets out the overarching approach to the Main Towns of Aylsham, Diss, Harleston, Long Stratton, and Wymondham. Consequential modifications to the housing table in the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to clarify that rural exception sites for affordable housing will be permitted on land adjacent or well related to the settlement boundary of the Main Towns (previously this was unclear). **MM14** makes these changes.

Policy 7.3 - The Key Service Centres

80. Policy 7.3 sets out the overarching approach to the Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham. Consequential modifications to the housing table in the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to clarify that rural exception sites for affordable housing will be permitted on land adjacent or well related to the settlement boundary of the Key Service Centres (previously this was unclear). **MM15** makes these changes.

Policy 7.4 - Village Clusters

81. Policy 7.4 sets out the overall approach to the Village Clusters, which include a significant number of smaller settlements in the Plan area. Consequential modifications to the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to provide clarity regarding the proposed supply, and to remove the word “infill” which is unnecessary in relation to sites that are within existing settlement boundaries. **MM16** makes these changes.

Policy 7.5 - Small Scale Windfall Housing Development

82. As submitted, Policy 7.5 would allow for small scale residential development adjacent to any development boundary or “*within or adjacent to a recognisable group of dwellings*”. This would apply across the Plan area, although cumulative development permitted under the policy would be capped at 3 dwellings in smaller parishes and at 5 dwellings in larger parishes. There are a number of problems with this approach. In particular, it would permit new housing development in remote locations including adjacent to “*recognisable groups of*

*dwelling*s” that do not constitute a settlement. This would be contrary to national planning policy which seeks to promote sustainable development in rural areas and to avoid the development of isolated homes in the countryside. Moreover, whilst the policy states that “*positive consideration will be given to self and custom build*”, it would equally allow for open market housing in these locations. In this regard, it is unclear that it would provide any additional incentive to deliver self and custom build housing.

83. We also have practical concerns regarding how this policy would operate. The approach of allowing for small open market housing developments in areas where housing has previously been strictly controlled is likely to attract significant interest. In this regard, it is unclear how the proposed cap could operate effectively in a situation where several applications were lodged concurrently in the same parish.
84. At the hearings, the possibility of Policy 7.5 operating as a self and custom build exception sites policy was discussed, and the Partnership subsequently indicated that it wished to pursue that approach. Such an approach would be justified given the need for self and custom build housing, which is discussed separately under Issue 6. Accordingly, **MM17** modifies Policy 7.5 to that effect, and alters the policy wording to apply solely to settlements rather than “*recognisable groups of dwellings*”. It also sets out criteria to ensure that such developments respect the form and character of the settlement and do not lead to an inappropriate cumulative level of development. Given the size threshold and policy criteria that would apply to such proposals, we do not consider that this approach would significantly affect the availability of rural exception sites for affordable housing.

Policy 7.6 - Preparing for New Settlements

85. Policy 7.6 sets out an approach to identifying one or more new settlements to be brought forward in the next local plan.
86. The Plan identifies enough sites to meet housing need to 2038 as is set out elsewhere in this report. This Plan will be subject to review in accordance with the provisions of the Framework. There is no submitted evidence that major new additional sites are required before 2038 or that new settlements should be a favoured option in any case. The supporting text to the Policy indicates that these new settlements could be delivered from 2026 which is contrary to the spatial strategy set out in the Plan.
87. The Policy is not consistent with the Sustainable Growth Strategy set out in Policy 1. It is not justified, does not accord with the submitted evidence, and provides significant uncertainty for communities. It is open to the authorities to consider options for future growth when they review the Plan but there is no

need for this Plan to refer to such options in a policy. Indeed Policy 7.6 could be prejudicial to those considerations. **MM18** therefore deletes this policy.

88. **MM4** is necessary for effectiveness in order to make changes to the supporting text of Paragraph 187 to explain that a review of the Local Plan will need to assess options for longer term growth which may include the potential for a sustainable new settlement or settlements.

Conclusion

89. Subject to the modifications set out above, the strategy for the economy and areas of growth is justified, effective and consistent with the evidence.

Issue 4 – Whether the Plan policies relating to Sustainable Communities and Environment Protection and Enhancement are justified, effective and consistent with national policy?

Policy 2 Sustainable Communities

90. Policy 2 seeks to ensure that development is of high quality design, contributes to resilient and inclusive communities, and helps to address climate change. It covers various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption. There is clearly a need for a policy of this sort in the Plan. However, a series of modifications are necessary to remedy ineffective wording so that it is clear how a decision maker should react to development proposals. Modifications are also necessary to remove text that does not serve a clear purpose, to avoid unnecessary duplication including with other plan policies, and to avoid conflating distinct planning issues.
91. It is necessary to modify the first paragraph to insert “where relevant” as most of the policy criteria will not be relevant to all development proposals. Part 1 of the policy is altered so that appropriate emphasis is placed on non-car modes. Changes to part 4 of the policy are necessary to clarify that minimum densities are not merely “indicative” but that they will also be subject to consideration of accessibility and local character. In addition, part 9 of the policy is modified to remove reference to the automatic adoption of any more stringent optional standards that may emerge in the future. In this regard, the content of any such standards is currently unclear, including whether any stipulations would be attached to their adoption in a local plan. Were any such standards to emerge, that would be a matter for a future review of this Plan.
92. The deletion of part 10 of the policy is necessary as these matters are now addressed in the Building Regulations, which have subsequently set higher

national minimum energy efficiency standards than are referred to in the policy. A further change to the Building Regulations is planned for 2025 which will mean that homes built to that standard will be net zero ready. A new part 10 of the policy is necessary to address energy consumption in terms of design, layout, and orientation and to provide for the use of sustainable energy, local energy networks, and battery storage where appropriate. The transfer of part iv into the explanatory text is also necessary as this section is for information only and is not intended to guide the determination of planning applications.

93. We note the request to modify Policy 2 so that it would require major developments to detail how they would fund the necessary police infrastructure. However, Policy 4 already requires that development proposals support local infrastructure capacity improvements through on-site provision, providing land and developer contributions. Accordingly, such a modification is not required for soundness. The policy wording also adequately covers measures to mitigate and adapt to climate change, and no further modifications are required in this regard. The historic environment and the setting of the Broads are both addressed in Policy 3, and it is unnecessary to duplicate that here. None of the other changes suggested in the MM consultation are necessary for soundness, with the exception of a detailed alteration to refer to protecting water quality.

94. **MM8** makes the changes referred to above.

Policy 3 Environmental Protection and Enhancement

95. Policy 3 sets out an approach that seeks to enhance the built, historic, and natural environments. In this regard, it contains criteria relating to design, designated and non-designated heritage assets, and designated and non-designated natural assets. A policy covering these matters is clearly necessary in the Plan. However, a number of modifications to the policy wording are necessary to ensure consistency with national policy and the statutory tests that relate to listed buildings, conservation areas, and those set out in the Habitats Regulations.

96. In terms of the 'Built and Historic Environment' section of the policy, several modifications are necessary in order to separate out distinct requirements and planning issues. Modifications are also necessary to include reference to conservation area appraisals and historic landscape character assessments, and to highlight the contribution that landscapes, views, and the Broads make to the historic environment. These changes are required for clarity and effectiveness.

97. With regard to the 'Natural Environment' section of the policy, a number of detailed modifications are necessary for clarity and to avoid conflating separate planning designations, including the distinct tests that apply to each. An additional bullet point is necessary to refer to the enhancement of the strategic

green infrastructure network, which was not adequately addressed in the submitted version of the policy. Modifications are also necessary to avoid lending the weight of the development plan to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and local green infrastructure strategies, as these are not Development Plan Documents and may be subject to revision without external scrutiny or oversight. Moreover, additional paragraphs within this section are necessary to require a project level HRA to be undertaken where there would be a likely significant effect on a European site, and to reflect the Partnership's nutrient neutrality strategy. Following the MM consultation, further detailed changes have been made for clarity and consistency with national policy.

98. A Written Ministerial Statement on Nutrient Neutrality in River Basin Catchments was issued during the examination, and Natural England wrote to a number of planning authorities to advise that as a competent authority under the Habitats Regulations, they should carefully consider the nutrient impacts of any new plans, policies and development proposals. This affects sites within the catchments of the Wensum Special Area of Conservation, the Broads Special Area of Conservation and the Broadland Ramsar, which cover most of the Plan area. The Partnership subsequently produced a Nutrient Neutrality Mitigation Strategy and a viability study addendum, and it agreed a statement of common ground with Natural England. As a result, modifications to Policy 3 were proposed that would require applicants to provide evidence, through a HRA, that relevant proposals would not adversely affect the integrity of sites in an unfavourable condition. This modification is necessary to ensure that the Plan accords with national planning policy and the Habitats Regulations.

99. **MM9** makes the above changes to Policy 3.

Conclusion

100. Subject to the abovementioned MMs, we consider that the Plan policies relating to Sustainable Communities and Environment Protection and Enhancement are justified, effective and consistent with national policy.

Issue 5 – Is the approach to Strategic Infrastructure justified and effective and does it accord with the evidence?

101. Policy 4 sets out the approach that is taken in respect of identifying and delivering strategic infrastructure improvements which are necessary to support the growth identified in the Plan. These improvements relate to transport and other strategic infrastructure including energy, health, education and utilities.

102. The Policy provides the overarching approach, with more detail set out in an appendix to the Plan. That appendix is not policy and can be updated without the need for a review of the Plan.
103. The Policy wording refers to the Transport for Norwich Strategy. This is a transportation plan led by Norfolk County Council, which covers a significant proportion of the Plan area. It sets out a number of key transport schemes and projects, some of which are necessary to support the levels and pattern of growth in the Plan.
104. To be justified and effective, the wording of Policy 4 needs to be modified to make it clear that the schemes listed within the Policy are not proposals within the Plan, but in most cases, schemes already being promoted and progressed by other bodies including Norfolk County Council and National Highways. In this sense, to be effective, these schemes should be more clearly expressed as contextual projects being undertaken by key partners rather than projects that may appear to be requirements of the Plan itself. The Norwich Western Link falls into this category, and the modified wording highlights that this is a scheme on which work is already underway. This road project is not required to deliver any allocation in the Plan but, it is appropriate for it to be referenced as a strategic infrastructure project being progressed by the Highway Authority.
105. There is also a need for the Policy to make reference to new police building infrastructure requirements within the list of strategic infrastructure categories, based on the evidence submitted.
106. In light of representations made to the MM consultation, we consider that for effectiveness and to make the policy wording unambiguous, a reference to green infrastructure strategy updates needs to be added to the paragraph of the Policy relating to the green infrastructure network.
107. **MM10** addresses these matters.

Conclusion

108. Subject to **MM10**, the approach to Strategic Infrastructure accords with the evidence and is justified and effective.

Issue 6– Whether the Plan’s approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.

Affordable Housing

109. The evidence base underpinning the affordable housing requirements in Policy 5 is supported by the Greater Norwich Local Housing Needs Assessment 2021. The need for affordable housing across the Plan area is around 670 homes per annum which includes an allowance for stock lost through right to buy. We consider the evidence base that supports the policy requirement to be soundly based.
110. The lower policy requirement for Norwich city centre is based on the prevalence of previously developed land and the challenges in securing over 30% affordable housing on such sites. Both requirements have taken account of viability evidence.
111. We consider that the assumption that the SNVCHAP will provide 33% affordable housing to be appropriate. This is the policy requirement and there is no evidence before us which indicates that this level of provision cannot be achieved across that plan area.
112. The policy provides for circumstances where individual schemes on brownfield sites can justify a lower affordable housing delivery on the basis of a viability assessment. However, this approach is not justified since it is possible that the development of greenfield sites may also have viability issues due to possible abnormal costs and the Framework does not refer to brownfield sites only. If it can be demonstrated through a viability assessment that a site cannot provide the affordable housing required by policy, then the land status is not relevant. Therefore, an amendment to remove reference to brownfield sites is necessary.
113. The policy requires purpose-built student accommodation to provide affordable housing ordinarily on site. However, given the practicalities of securing and managing affordable housing within student housing schemes it should be modified to require a financial contribution to off-site affordable housing, for effectiveness.
114. The requirement for 10% of all affordable housing, rather than 10% of the total number of homes, to be provided as affordable home ownership is inconsistent with the Framework and therefore needs to be removed.

Gypsy, Traveller, and Travelling Showpeople Accommodation

Need and requirement

115. Following further work undertaken during the Examination, a requirement for 52 Gypsy and Traveller pitches was proposed over the Plan period to 2038. This is based on meeting the overall 'ethnic need' for pitches identified in the Greater Norwich Gypsy and Traveller Accommodation Assessment (2022) ('GTAA'), which is consistent with the most recent definition of "gypsies and travellers" in Planning Policy for Traveller Sites ('PPTS'). The GTAA is based on a thorough assessment which included a 90% survey rate of authorised pitches in the Plan area. Whilst around 10% of those surveys were undertaken via third parties, including family members, that is a relatively small proportion and there is no indication that this has undermined the results of the study. Moreover, the survey data was validated in discussion with the Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service, and by speaking to site managers. The assessment was also informed by stakeholder consultation including with the National Federation of Gypsy Liaison Groups and the Showmen's Guild of Great Britain.
116. Whilst it is argued that some Gypsy and Traveller families living in the Plan area have been omitted, no detailed evidence has been submitted in support of that contention. In this regard, a study undertaken in relation to the Kings Lynn GTAA has not been submitted to the Examination, and it is therefore unclear whether it has any implications for the Greater Norwich GTAA. An assumption has also been made about those residing in bricks and mortar accommodation who may wish to live on a Gypsy and Traveller pitch, and so the assessment is not restricted to those currently living in a caravan. Separately, whilst it is noted that caravans made up 0.45% of the total housing stock in the 2011 Census, that figure included park homes, agricultural workers accommodation, and other caravans not associated with Gypsies and Travellers. It is therefore of limited value in assessing the need for Gypsy and Traveller pitches.
117. In terms of migration assumptions, the GTAA assumes that inflows and outflows will balance out over the Plan period. However, as none of the surveyed households expressed a desire to leave the Greater Norwich area, this effectively assumes that no one will choose to in-migrate either. During the hearings, the Partnership stated that the 2021 Census indicated that in-migration rates were relatively low. The Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service representative also stated that in their experience movement in and out of Greater Norwich was limited. However, it is unlikely that there will be no in-migration into the area, as is currently assumed. The use of a criteria-based policy is therefore necessary to address such cases and to provide the requisite flexibility.

118. Overall, we consider the GTAA to be based on robust assumptions, and it forms an appropriate basis for planning for Gypsy, Traveller and Travelling Showpeople provision in the Plan area. In this regard, modifications to Policy 5 are necessary to include a requirement for both Gypsy and Traveller pitches and Travelling Showpeople plots based on the needs identified in the GTAA. This is necessary in order for the Plan to be positively prepared, justified, and consistent with national policy, as set out in PPTS.

Transit provision

119. The GTAA recommends that the Partner authorities set up a negotiated stopping places policy to address transit provision. In this regard, there is an established Norfolk and Suffolk unauthorised encampment protocol in place, which was summarised at the hearings as *“toleration if possible, eviction if necessary”*. Such an approach has been used in recent years to manage unauthorised encampments in the area, the majority of which relate to Gypsies and Travellers who are visiting or passing through. The Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service representative stated that this established approach has worked well, and that around 50% of unauthorised encampments are tolerated on this basis. In light of the evidence before us, including that given at the hearing sessions, we are satisfied that this is a sensible approach to transit provision and that the Plan is therefore sound in the absence of allocating sites for this purpose.

Site allocations

120. The submitted version of the Plan did not include any site allocations for Gypsy and Traveller or Travelling Showpeople accommodation. In this regard, no potential sites were promoted to the Plan at any stage of Regulation 18 between 2018 and 2020. However, during the Examination, the Partnership undertook further work which led to the identification of several potential allocations. This is discussed further under Issue 7. Given the identified need for Gypsy and Traveller provision, and the availability of sites to meet this need, site allocations are necessary for the plan to be positively prepared, justified, and consistent with national policy.

121. In terms of the spatial distribution of sites, these are spread across the Plan area and are generally in rural locations. The proposed allocations are a mix of extensions to existing sites and entirely new sites, which would be capable of meeting the identified need which will largely arise from household growth.

Criteria in Policy 5

122. Policy 5 of the Plan sets out criteria against which to assess planning applications for Gypsy and Traveller and Travelling Show People sites. This approach is necessary to ensure that the Plan is positively prepared, flexible, and to provide a basis for determining planning applications on sites that are not allocated in the Plan. However, modifications to Policy 5 are necessary to identify the site allocations and the assumed capacity and delivery timescales for each. Further modifications are necessary to clarify that the loss of existing pitches will be resisted unless certain circumstances apply, which is necessary to protect the existing supply of sites. In addition, modifications to policy criteria relating to accessibility and landscaping are necessary as most Gypsy and Traveller sites are located outside of the urban area. Other modifications are necessary for clarity, and to reflect the need for adequate storage at Travelling Showpeople plots.

Self and Custom Build Housing

123. Policy 5 requires that proposals of 40 dwellings or more should provide at least 5% of plots as serviced self and custom-build plots, unless a lack of need can be demonstrated, or a 12-month marketing exercise has been undertaken. Whilst this requirement excludes proposals for flats, a modification is required to exclude other schemes where provision of self and custom build would be clearly impractical, e.g. schemes of wholly terraced housing.
124. Each Partner authority keeps a self-build and custom housebuilding register of those who wish to acquire serviced plots in order to build their own home. These registers are managed differently; in Norwich and Broadland a fee is charged to register and registrations must be renewed annually, whereas in South Norfolk there is no fee or mandatory renewal process. In the 7 years following the registers being set up in 2016, a total of 39, 92, and 719 unique registrations were received in Broadland, Norwich, and South Norfolk respectively. This is a significant range of figures. However, not everyone who wishes to build a self or custom build property will necessarily choose to register, particularly in areas where a fee is charged. Conversely, the lack of a fee may encourage registrations in other areas. Actual demand for each of the 3 Partner authorities is therefore likely to be somewhere between the figures for Norwich and South Norfolk, although this would still represent a considerable level of demand. We also note that some of the Partner Authorities count all developments of 1-5 dwellings as being self and custom build housing, which is likely to artificially inflate the assumed supply that has come forward. In these circumstances, the requirement in Policy 5 is justified in order to deliver self and custom build housing in the Plan area.
125. In terms of the supply of plots this requirement would deliver, Table 6 of the submitted Plan identifies that 'new allocations' would contribute 10,704

dwellings to the overall housing supply. However, that figure includes large sites such as Anglia Square (Ref GNLP0506), the East Norwich Strategic Regeneration Area (Ref GNLP0360/3053/R10), and other sites in Norwich city centre that will deliver mostly flatted development and so would be exempt. A number of the proposed housing allocations also have an assumed capacity of less than 40 dwellings or have now been granted planning permission. Moreover, most 'existing commitments' in the Plan housing supply already have planning permission. Accordingly, the contribution to the supply of self and custom build plots from this source is likely to be no more than around 200-300 dwellings. The policy 5 requirement is therefore unlikely to deliver an oversupply of self and custom build plots, even in combination with modified policy 7.5 (discussed separately under Issue 3).

126. A number of practical concerns regarding the delivery of self and custom build plots under Policy 5 have been raised. However, the requirement to market such plots for 12 months before they revert to open market housing could be accommodated in most build programmes with appropriate planning. Whilst a lack of demand for such plots in schemes elsewhere has been cited, it is unclear whether those examples are representative of demand in Greater Norwich. The Partnership has also drawn our attention to recent planning applications that have included provision for self and custom build plots. Moreover, the Council's Viability Appraisal Supplementary Appendix 2 suggests that this policy requirement will not reduce scheme viability. Whilst it is argued that it will complicate the planning process and some elements of the construction programme, there is no detailed evidence before the Examination that this would have a significant negative effect on viability.

Purpose-built Student Accommodation

127. Policy 5 is supportive of purpose-built student accommodation within the University of East Anglia ('UEA') campus. This approach is justified and is supported by site allocations within the campus area. However, a modification is necessary to clarify that proposals should only have regard to, rather than accord with, the UEA Development Framework Strategy as this is not a Development Plan Document. A further modification is required to clarify that purpose-built student accommodation within the UEA campus will not be required to provide an affordable housing contribution, as these sites would not be suitable for general needs housing given their campus location.
128. Away from the UEA campus, the policy sets criteria against which applications for purpose-built student accommodation would be assessed. Modifications to this part of the policy are necessary for precision, and to clarify that an offsite affordable housing contribution will be sought. The requirement to "*make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing*" is deleted as it is ineffective. In this regard, it is not clear how the amount of affordable housing

that would otherwise be delivered could be calculated in the absence of an alternative scheme. Instead, the modified policy wording states that detailed guidance will be provided in a Supplementary Planning Document, which would allow for a more practical approach to be devised.

129. In terms of the principle of seeking affordable housing contributions from purpose-built student accommodation, our view is that this is appropriate outside of the UEA campus. In this regard, these uses are residential in nature and typically occupy sites that could otherwise be developed for general purpose dwellings.

Accessible and Specialist Housing

130. The approach to accessible and specialist housing in Policy 5 is generally sound, but the sentence requiring affordable housing to be provided in all specialist older persons housing schemes (rather than just in major development), does not accord with national policy and needs to be deleted. The affordable housing requirements are set out elsewhere in the policy. There is no need for a modification to the Policy to set out a requirement for the number of specialised units which the Plan as a whole should deliver. Some sites are allocated for this use specifically and Policy 5 is positively worded and encourages specialised, accessible and adaptable homes.

Conclusion

131. All of the modifications to Policy 5 described above are set out in **MM11**. Subject to these modifications, we consider that the Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.

Issue 7 – Are the site allocations consistent with the Spatial Strategy and the evidence, are they justified and effective and can they be delivered?

Site Assessment Process

132. Potential site allocations were assessed using a standardised approach. This included subjecting all submitted sites to a 'red, amber, green' Housing and Economic Land Availability Assessment ('HELAA') assessment and sifting out sites that were subject to over-riding constraints. This produced a shortlist of reasonable alternatives that were subject to SA. The shortlisted sites were then discussed in detail with Highways, Development Management, Lead Local Flood Authority and Children's Services colleagues to come up with a list of

preferred sites for allocation. Whilst it is argued that this latter stage was opaque and relied on informal discussions and subjective opinion, it is inevitable that professional judgement will play a role in the allocation process. Moreover, the comments / input from each participant is recorded in the Site Assessment booklets and the reason for selecting certain sites is clearly set out. Overall, we consider this to be a robust approach that has led to the identification of sites which are generally appropriate for allocation (with a small number of exceptions). Each proposed site allocation is subject to further detailed discussion below.

133. Whilst the assessment of some sites has been challenged, the judgements that have been made are within the bounds of reasonableness in our view. The Site Assessment booklets adopt a different approach to the SA. However, that is not unsurprising given that the SA is a high level document and is just one of the pieces of information that feeds into the selection of potential allocations.

134. Overall, we are satisfied that the Partnership's approach to site assessment and selection is appropriate and is justified.

Sequential and Exception Tests

135. Several of the proposed allocations incorporate land that is at risk of either surface water or fluvial flooding. In some cases, this affects only a very small part of the site (less than 5%) and so could easily be avoided at application stage. Moreover, given the location of these areas of flood risk within the site, it is often impractical to exclude them from the allocation altogether. In such cases, we consider that the Sequential Test has been met. Separately, several brownfield allocations in and around Norwich city centre are either wholly or partly within Flood Zones 2 and 3 associated with fluvial risk from the River Wensum. However, these sites are essential to deliver the Plan's strategy which seeks to maximise brownfield development and regeneration opportunities, particularly in and around the city centre. In this regard, there are insufficient brownfield sites in accessible locations such as these to meet the Plan need for housing, which has necessitated the allocation of greenfield sites. In that context, and having regard to guidance at paragraph 163 of the Framework to take into account wider sustainable development objectives, we consider that these sites meet the Sequential Test. Moreover, with the exception of GNLP2163, each of these sites has either been previously allocated for development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) or has been granted planning permission.

136. A number of these sites are also partially within Flood Zone 3, and are therefore required to meet the Exception Test. Those sites are GNLP0360, R10, CC4B, CC7 and CC8. In the case of sites CC4B, CC7, and CC8, 21%, 2%, and 1% respectively of these sites are in Flood Zone 3, which relates to flood risk

associated with the River Wensum. These are prominent, riverside, brownfield sites in highly accessible locations with the potential to deliver significant numbers of new dwellings. The development of these sites also has the potential to enhance the river frontage and would deliver significant regeneration benefits to Norwich city centre. These wider sustainability benefits would outweigh the flood risk in our view, which in any case affects relatively small proportions of each site. With regard to sites GNLP0360 and R10, these are component parts of the East Norwich Strategic Regeneration Area, which is the largest site in the Plan and a key regeneration opportunity. The wider sustainability benefits of delivering these sites would be significant, including a substantial number of new dwellings, new bridges across the Rivers Wensum and Yare, and infrastructure that would connect the city centre to the open countryside and The Broads National Park to the east. These wider sustainability benefits would outweigh the flood risk in our view. Furthermore, each of these sites could be made safe for its lifetime, and this would be ensured through Plan Policy 2 and the site-specific policies. Consequently, the Exception Test is passed.

137. In addition, a number of the proposed Gypsy and Traveller site allocations are partially affected by surface water flood risk. In such cases, the site-specific policy requires that development of these areas be avoided. Moreover, given the very limited availability of suitable Gypsy and Traveller sites for allocation, each of these sites would meet the Sequential Test.

General Site Allocation Matters

138. A number of representations assert that detailed changes should be made to settlement boundaries within the Plan area. However, these are designated in other plans that have been adopted by each of the Partner authorities. Any detailed review of the settlement boundaries will therefore take place as part of any review of those separate plans, which are not superseded by the GNLP.
139. Modifications **MM112**, **MM141**, and **MM143** delete housing allocations in Hingham, Marsham and Reedham, for reasons which are set out below. In this regard, the Plan does not set a strategy or housing need figure that is specific to these settlements. Given that the Plan identifies a sufficient overall supply of housing it is unnecessary to allocate additional sites in these settlements, which in any case are towards the bottom of the settlement hierarchy.

Modifications that apply to multiple site-specific policies

140. A number of MMs have been applied to multiple site-specific policies. For sites within the locally designated Norwich 'Area of Main Archaeological Interest', a criterion has been added which requires the submission of an archaeological assessment at application stage. This is necessary to protect archaeological

interests in and around the area of the former walled city. For site-specific policies that refer to conservation areas, the policy wording has been modified to state “conserve, and, where opportunities arise, enhance”, rather than “conserve and enhance” to ensure consistency with national planning policy and the statutory test at s72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. A significant number of site-specific policies have also been altered to comply with modified Policy 2 in relation to reduced levels of car parking in highly accessible locations. In addition, all cross-references to Policy CS16 of the Norfolk Minerals and Waste Core Strategy have been moved to the supporting text to prevent unnecessary duplication of policies in other plans.

141. A number of site-specific policies state that “*a minimum of*”, “*at least*”, or “*up to*” a certain number of dwellings shall be permitted. However, in most cases this was not justified, and these policies have therefore been modified to state “*approximately*”, which allows for an appropriate degree of flexibility. Following these changes, statements such as “*more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints*” are unnecessary and have been deleted. Separately, following the publication of the Water Cycle Study, it was no longer justified to require phasing to be in line with upgrades to certain water recycling centres, and these references have therefore been deleted.
142. The wording of several site-specific policies has been modified to remove reference to the acceptability of a proposal being subject to measures “*required by the Highway Authority*”, or requirements that the Historic Environment Record be consulted. This is necessary as a proposal could be acceptable in highways terms despite not incorporating certain measures requested by the Highway Authority. In this regard, acceding to the opinion of the Highway Authority should not be a policy requirement. Similarly, a proposal could be acceptable in terms of its impact on the historic environment without the Historic Environment Record having been consulted. It should therefore not be a policy requirement to do so. Moreover, the planning authority is responsible for determining planning applications, and not any other body.
143. We consider that adding references to actions such as ‘*early engagement*’ with a statutory authority are not necessary for soundness. It is also asserted that there is an inconsistency between policies for sites in Norwich that are adjacent to the River Wensum, as some refer to the Broads and others do not. However, that is not a soundness issue, and the Partnership is able to add such references to the supporting text should it wish to do so. Similarly, cross-references to the dark skies of the Broads are not necessary for soundness.
144. A number of the site-specific policies refer to nearby designated heritage assets, including listed buildings and conservation areas. However, it is unnecessary for soundness that these be comprehensive of every heritage asset that may be affected by a development. In this regard, designated

heritage assets are protected by other development plan policies that will apply at planning application stage.

Identification of Gypsy and Traveller, and Travelling Showpeople, site allocations

145. The Partnership has undertaken a pro-active approach to the identification of potential Gypsy and Traveller, and Travelling Showpeople, site allocations. In this regard, it has reviewed existing Council-owned sites, consulted with Gypsies and Travellers, and Travelling Showpeople residing in the Plan area, and engaged a local land agent to look for sites on its behalf. It has also encouraged the submission of potential site allocations from land owners. This proactive approach led to the identification of a pool of potential sites, which were then subject to a detailed site selection process based on that used in the HELAA. Each site has also been subject to SA and HRA assessment. In our view, this is a robust approach to identifying and assessing potential sites.
146. The capacity of each allocation has been assessed based on either input from the landowner/developer, or by applying a standard density assumption, depending on the available information. With one exception (site GNLP5004R, discussed below) the assumed capacity is realistic. The availability and delivery of each site has also been robustly assessed.
147. In terms of accessibility, most of the site allocations are in rural and semi-rural locations. The majority of these are extensions to or intensifications of existing Gypsy and Traveller sites, and their location reflects the fact that most Gypsy and Traveller sites are located outside of existing urban areas. In addition, the availability of potential Gypsy and Traveller site allocations is limited, particularly when compared to potential housing allocations. In these circumstances, a less rigid approach to accessibility is justified in comparison to that which has been applied to bricks and mortar housing. Nonetheless, we are satisfied that the accessibility of the proposed site allocations is not unacceptable.
148. In addition to the need for Gypsy and Traveller pitches, the GTAA identifies a need for 43 Travelling Showpeople plots. Whilst the Plan does not identify any allocations to meet this need, that is in the context of an absence of sites either being put forward or identified for this purpose. This was despite an extensive search process which, conversely, led to the identification of several Gypsy and Traveller site allocations. Moreover, a Statement of Common Ground has been agreed between the Partner Authorities and the Showmen's Guild of Great Britain (Eastern Region) that endorses the use of a criteria-based policy to meet the needs of Travelling Showpeople. In these circumstances, we consider this approach to be soundly based.

Housing and Mixed Use Site Allocations

Norwich

East Norwich Strategic Regeneration Area (GNLP0360/3053/R10)

149. The East Norwich Strategic Regeneration Area ('ENSRA') is a key strategic site in the Plan. It consists of three brownfield regeneration sites by the rivers Wensum and Yare, along with an area of land in front of ATB Laurence Scott. It is a major opportunity to create a new urban quarter for Norwich with the potential to be well linked into the city centre and to the countryside to the east along the river corridors. The recent developments close to Norwich City's stadium offer a glimpse of how this corridor could be extended further and link sustainably to the station and the core of the city. The principle of development here links well to the Plan's spatial vision and strategic objectives. It is a fundamental part of the future development of the city and central to the growth ambitions of the Greater Norwich area.
150. Parts of the site are allocated in the adopted Norwich Site Allocation and Site-Specific Policies Plan (2014). However, the proposed allocation in this Plan is significantly larger and includes additional land such as the Carrow Works site.
151. It is clear to us that the delivery of the whole ENSRA presents significant challenges. A number of constraints would have to be overcome, including obstacles to securing access to parts of the site. The redevelopment of the Carrow Works site requires demolition of some large buildings whilst protecting the heritage assets of the site including the listed Carrow Abbey. The Utilities site is constrained by the presence of railways and the river and would require significant investment in infrastructure to bring it to fruition. It requires an all-modes bridge across the River Wensum from the Deal Ground which itself requires a new bridge across the River Yare from the May Gurney site.
152. The delivery of the whole ENSRA relies upon a significant degree of public funding. Evidence presented by the Partnership indicates a requirement of £153M of public sector funding in order to generate a 15% profit on Gross Development Value, which is a rate considered necessary to attract private sector investment. Progress has been made on identifying and securing external finance but the certainty of an allocation in the Plan will assist the Partnership and promoters in working to bring in such funding. If not allocated in the Plan, the prospects of securing public funding through for example Homes England sources, and the consequential private sector investment, would be less likely. Parts of the site are not reliant on such funding and their early development will assist in creating a residential environment which could help to bring forward the more remote parts of the ENSRA.

153. However, the evidence before us does not support the likely prospect of the Utilities Site coming forward before the end of the Plan period. Access to it is constrained by the railway line and river, and significant infrastructure works will be required to progress its delivery. However, the Utilities site should be allocated as it is clearly a part of the ENSRA site, enables benefits to be brought to the wider redevelopment, and requires regeneration. There are no planning reasons why redevelopment cannot be commenced within the Plan period if funding and delivery constraints can be overcome.
154. Progress on the planning application for the Carrow Works has been slower than envisaged, whilst there has been progress with the reserved matters planning application for the May Gurney/Deal sites suggesting earlier delivery is more likely there.
155. For these reasons we consider that the allocation of the ENSRA is justified and positively prepared. However, we consider that the proposed timetable is overly ambitious. The evidence before us does not support the position that the whole ENSRA would be complete by 2038. Nor does it support the position that the allocation, other than on the May Gurney/Deal site, would start to deliver housing completions in 2025/26. For the reasons set out above, we do not consider that the Carrow Works site will start to deliver in the first five years. We therefore consider it necessary for a modification to the trajectory to show that the housing delivery is moved backwards within the Plan period. This has implications for the 5 year supply position which we address in Issue 8.
156. A small part of the ENSRA site is outside of the Plan area, and so a reduction of the total expected delivery within the Plan area is required. Further reductions are needed for the reasons set out above. The appropriate number of homes to be delivered on the site within the Plan period is therefore around 3000 units.
157. The detailed policy for the ENSRA, (GNP0360/3053/R10) sets out a number of site-specific requirements. In the submitted plan there is a significant degree of duplication between the Policy set out here and Policy 7.1. This is not effective. **MM13** and **MM22** address this.
158. Modifications to the policy wording are necessary to identify the key pieces of infrastructure that will need to be delivered across the component parts of the allocation. This includes the provision of bridges over the River Wensum and the River Yare, pedestrian and cycle connections, a marina, a site for a primary school, land for healthcare provision, and other highways and infrastructural works. Modifications are also required in order to clarify the role and scope of a Supplementary Planning Document which will provide detailed planning guidance for the development of the site. In this regard, the Partnership now intend to prepare an SPD instead of the 'masterplan' which was previously referred to in the policy. Further modifications are necessary to ensure that a

high quality of design is achieved, to address heritage assets within and close to the site, and to clarify the requirement for archaeological assessment. **MM22** makes these changes, which are necessary for effectiveness and to ensure that the policy is justified.

159. Separately, it is unnecessary for the policy to itemise every designated heritage asset that may be affected by the development of this site as these assets are protected by other plan policies that will apply at application stage. The level of detail in relation to design is also sufficient. In our view, none of the further changes suggested in the MM consultation are necessary for soundness.

Land adjacent to the River Wensum and the Premier Inn, Duke Street (GNLP0068)

160. This is a brownfield site located within Norwich city centre that benefits from extant planning permission for student accommodation. It is appropriate to allocate it for residential-led development, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. These are addressed in **MM23**.

Land adjoining the Enterprise Centre at Earlham Hall (GNLP0133BR)

161. Earlham Hall is a Grade II* listed building and the site contains other listed buildings, an Historic Park and Gardens, and is in a Conservation Area. The wording of criterion 2 of the Policy needs to be modified for effectiveness to require that a heritage impact assessment will be required, and to address the soundness issues identified above. **MM24** achieves this.

Land north of Cow Drive, University of East Anglia (GNLP0133C)

162. To be effective and justified the policy needs to be modified to replace the word 'minimum' with 'approximately' when referring to the number of student bedrooms required as part of the allocation. In addition, the final paragraph is not necessary as it refers to development needing to accord with an approved planning consent. **MM25** makes these changes.

Land between Suffolk Walk and Bluebell Road (GNLP0133DR)

163. To be effective and consistent with national policy, criterion 2 needs modifying to require a heritage impact assessment to be undertaken, and to address the soundness issues identified above. Paragraph 2.39 of the supporting text refers to a requirement for opening up new areas of public access as part of proposed development. The evidence as to how this could be secured or whether it is a reasonable requirement to impose on an applicant is not convincing. This requirement is not justified and needs to be deleted. **MM26** makes these changes.

Land at Constitution Motors, 140-142 Constitution Hill (GNLP0282)

164. This is a cleared brownfield site in Norwich, with extant planning permission for 12 dwellings. It is appropriate to allocate for residential development subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. These are remedied in **MM27**.

Land at the UEA Grounds Depot Site, Bluebell Road, University of East Anglia (GNLP0133E)

165. The allocation is for future development at the university. It is expected to come forward in the later part of the Plan period. The policy makes provision for additional student bedroom accommodation with ancillary space. The allocation is sound without modification.

Former Eastern Electricity Headquarters (Dukes Wharf), Duke Street, (GNLP0401)

166. This is a mixed-use site. The housing element of the scheme could be residential or student accommodation. The allocation is sound in principle, subject to modifications that are necessary for clarity, for effectiveness in relation to heritage interpretation measures, and to address the soundness issues identified above. **MM28** resolves these issues.

Land at Whitefriars, Norwich (GNLP0409AR)

167. Most of this site was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from planning permission for a mixed use scheme of dwellings and commercial units and is currently under construction. The site is appropriate for re-allocation in the Plan, however, modifications are necessary to address the soundness issues identified above. **MM29** addresses these.

Land south of Barrack Street, Norwich (GNLP0409BR)

168. The site is currently used as a surface car park that serves the adjacent office buildings and is located on the edge of Norwich city centre. It was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). An outline permission for 200 dwellings and office space was approved in 2016, although this has since lapsed.
169. The site promoter contends that the policy wording should specify that a multi-storey car park be re-provided as part of any re-development of the site. In this regard, it is asserted that the existing level of parking is necessary to retain occupiers of the adjacent offices, due to the ready availability of car parking at

competitor office parks on the urban edge. The policy wording does not comment on the re-provision of parking, and this is a detailed matter that could be dealt with at application stage. In this regard, this is a sensitive design location, next to the river and near to designated heritage assets, and specifying the form of any re-provided car parking is not appropriate at this stage.

170. In our view the site is appropriate to allocate for mixed use development. However, given the uncertainty about when the site will come forward, it should not be included in the 5 year supply. Modifications to the policy wording are also necessary to reflect the uncertainty regarding the number of dwellings that will be provided, to correct some factual errors, and for effectiveness. These are remedied in **MM30**.

Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street (GNLP0451)

171. This is a vacant brownfield site in Norwich city centre that was granted planning permission for student accommodation in 2018. It is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary for clarity, to require replacement planting for any loss of trees, and to address the soundness issues identified above. These are remedied in **MM31**.

Land at and adjoining Anglia Square (GNLP0506)

172. This is a prominent brownfield site that is proposed as a residential-led mixed-use allocation, with the potential to deliver significant regeneration benefits to this part of Norwich city centre. It is in a sensitive location being set within a conservation area and in close proximity to a number of listed buildings. In this context, and given the likely mix of uses, the assumed figure of 800 dwellings is a reasonable approximation. However, additional wording is required to clarify that the precise number of homes should be determined at application stage in light of a detailed scheme. Other modifications to the policy wording are also necessary for clarity, effectiveness, and to ensure that the presence of designated heritage assets is adequately addressed. These matters are addressed in **MM32**.

173. The delivery of this site is reliant on a significant sum of grant funding, which has strict delivery timescales attached to it. Given these timescales and the commitment of the developer to achieve them we consider that the site will deliver as envisaged within the 5 year period.

Land at and adjoining St Georges Works, Muspole Street (GNLP2114)

174. This is a brownfield site on the northern edge of Norwich city centre. It is being promoted for development in the short term and is appropriate to allocate for

residential led mixed use development. However, modifications to the policy wording are necessary to allow for greater flexibility in terms of the uses that are specified, and to clarify that the site is capable of providing either around 110 homes or 5,000 square metres of commercial floor space, and not both. These, and other modifications which are necessary for clarity and to address the soundness issues identified above, are addressed in **MM34**.

Friars Quay Car Park, Colegate (GNLP2163)

175. A modification is required to make it clear that the site is expected to provide approximately 25 homes rather than require that to be a minimum. Such a requirement would be overly restrictive on this relatively small site. Further changes are necessary to address the soundness issues identified above. **MM35** addresses these.

Land west of Eastgate House, Thorpe Road (GNLP2164)

176. The allocation is sound in principle, subject to modifications which are necessary to address the soundness issues identified above. **MM36** addresses these.

Site at St Mary's Works and St Mary's House (GNLP3054)

177. This is a brownfield site on the northern edge of Norwich city centre. It previously benefitted from planning permission for mixed use development including 151 dwellings, but this has since lapsed. Nonetheless, the site is being promoted for development in the short-to-medium term and is appropriate to allocate for residential led mixed use development. However, modifications to the policy wording are necessary to allow for greater flexibility in the uses that are specified, and to clarify that any development should be residential led. Further modifications are required to remove unjustified requirements to enhance the adjoining churchyard and to provide housing "*in response to identified local community needs*", which is not specified for any other allocation. Modifications are also necessary for clarity, and to address the soundness issues identified above. These matters are covered in **MM37**.

14 Ber Street, Norwich (CC3)

178. This site is allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development for residential led mixed use housing is therefore established. The allocation is sound in principle, subject to general modifications for effectiveness and to address the soundness issues identified above. **MM39** addresses these points.

Land at Rose Lane/Mountergate (CC4a)

179. This is part of a previously allocated site for mixed uses, which is mostly owned by Norwich City Council. It is expected to come forward later in the Plan period. The Council now consider that it could deliver more than 50 homes so it is necessary to modify the current wording which restricts it to that amount. **MM40** makes these changes and other modifications which are necessary to address the soundness issues identified above.

Land at Mountergate/Prince of Wales Road (CC4b)

180. This is part of a previously allocated site for mixed uses that is a significant regeneration opportunity adjacent to the river. The principle of the allocation has been established and is justified. As with CC4a, the site is expected to deliver towards the later part of the Plan period. The Policy erroneously refers to a requirement to retain public open space whereas it should refer to provision of new public open space. **MM41** makes these changes and other modifications that are necessary to address the soundness issues identified above.

Hoborough Lane, King Street (CC7)

181. The allocation is sound in principle, subject to modifications which are necessary for clarity and to address the soundness issues identified above. **MM42** makes these changes.

King Street Stores, Norwich (CC8)

182. The allocation is sound in principle. However, criterion 3 of the policy and the supporting text at paragraph 2.140 need to be amended to refer to the need to retain the trees on the King Street frontage as part of any development proposal. The trees are covered by a Tree Preservation Order and the policy needs to be clear about the importance of retaining the trees which currently make an important contribution to the street scene. Further modifications are necessary to address the soundness issues identified above. **MM43** makes these changes.

Land at Garden Street and Rouen Road, Norwich (CC10)

183. The allocation of this site is sound in principle, subject to modifications to remove wording which unnecessarily repeats national policy on design, and to address the soundness issues identified above. **MM44** addresses these.

Land at Argyle Street, Norwich (CC11)

184. The allocation of this small site is sound in principle subject to modifications that are necessary to address the soundness issues identified above. **MM45** addresses these.

Norwich Mail Centre, 13-17 Thorpe Road (CC15)

185. Although currently in commercial use, the evidence indicates that there is a reasonable prospect that this site will come forward as a housing site in the Plan period. It is currently allocated in Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of redevelopment is therefore established. Its allocation in this Plan is sound subject to modifications to specify the designated heritage assets that any redevelopment proposals would have to respect, and to clarify policy wording. **MM47** addresses these.

Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way (CC16)

186. This site was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). Much of the site benefits from planning permission for housing development, and it remains appropriate to re-allocate in this Plan. However, modifications to the policy wording are necessary to address the soundness issues identified above, which are remedied in **MM48**.

Land at 140-154 Oak Street and 70-72 Sussex Street, Norwich (CC19)

187. This site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) as two separate sites and the principle of redevelopment is therefore established. The evidence indicates it is likely to come forward in the Plan period. The boundary is proposed to be amended slightly from that in the previous plan. The allocation is sound in principle, subject to correcting the address of the site in the Policy heading (to 150-154 Oak Street and 70-72 Sussex Street) and modifying the policy wording to address the soundness issues identified above, together with consequential changes to the supporting text. **MM49** makes these changes.

Land to rear of City Hall, Norwich (CC24)

188. This site lies directly behind the City Hall in the commercial heart of Norwich city centre. It was previously allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. The evidence indicates that with a more committed and positive

approach to disposal/redevelopment from the City Council it will come forward in the period of this Plan. The allocation is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM50** makes these changes.

Westwick Street Car Park Norwich (CC30)

189. This small site was previously allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. It is likely to come forward in the period of this Plan and its allocation is, in principle, sound. The policy wording needs to be amended to address the soundness issues identified above. **MM51** addresses this.

John Youngs Limited 24 City Road (R7)

190. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM54** addresses these issues.

Site of former gas holder at Gas Hill, Norwich (R13)

191. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity, to specify nearby heritage assets, and to address the soundness issues identified above. **MM55** addresses these issues.

Land at Ketts Hill and east of Bishop Bridge Road, Norwich (R14/R15)

192. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM56** addresses these issues.

Site of former Van Dal Shoes, Dibden Road, Norwich (R17)

193. The allocation of the site is sound in principle. The policy needs to be modified to replace 'minimum' with 'approximately' given the evidence and to make a consequential change to the supporting text. **MM57** addresses these issues.

Site of former Start Rite Factory, 28 Mousehold Lane (R18)

194. This is a brownfield site that benefits from planning permission for a 79 bed residential care home and 42 supported living apartments. At the time of the hearings, construction was underway. The allocation is sound in principle

subject to modifications to the policy wording which are necessary for clarity to address the soundness issues identified above. These are remedied in **MM58**.

Land north of Windmill Road, Norwich (R19)

195. This is a vacant site in Norwich, surrounded by existing housing, that was granted planning permission for 17 dwellings in 2019. It is appropriate to allocate for residential development, subject to modifications which are necessary to address the soundness issues identified above. These are remedied in **MM59**.

Land east of Starling Road, Norwich (R20)

196. This is a cleared brownfield site in close proximity to the northern edge of Norwich city centre. Planning permissions have been granted on different parts of the site for a total of 28 dwellings. Given these separate permissions, a reference in the policy wording to comprehensive development is not justified. It is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary for clarity and effectiveness. These are addressed in **MM60**.

Land at Hurricane Way, Airport Industrial Estate, Norwich (R29A and B)

197. These are two previously allocated sites within the Airport Industrial Estate. The principle of development is therefore established. Although they have not yet come forward for development, there is evidence to indicate that they will do so in this plan period. The allocation for both parcels is sound subject to modifications that are necessary to address the soundness issues identified above. This is addressed in **MM61**.

Heigham Water Treatment Works, Waterworks Road, Norwich (R31)

198. The site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. Although reduced in extent to reflect the operational requirements of Anglian Water, the allocation of the site is sound in principle subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM63** addresses these issues.

Mile Cross Depot, Norwich (R36)

199. This site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). The principle has therefore been established. The site has been cleared and is the ownership of Norwich City Council. Planning proposals

are being advanced by the Council and the evidence indicates that homes could be completed in on the site early in the plan period, with some within the first five years. The allocation is sound in principle but the policy needs to be clarified for effectiveness to refer to the number of homes not being a minimum and to specify that the final number of homes to be delivered may be dependent upon the scale of community uses delivered as part of the scheme. **MM64** addresses these issues.

The Norwich Community Hospital site, Bowthorpe Road (R37)

200. This is an NHS hospital site within Norwich, part of which was allocated for housing development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from outline planning permission to provide a new hospital, residential care home, extra care units, key worker units, and other residential units through the conversion of Woodlands House. Part of the site falls outside of this permission, and this land has the potential to deliver a further 50 dwellings. However, subsequent meetings with the Trust indicate that various development options are being considered, and in these circumstances, the site is unlikely to contribute towards the 5 year supply. Whilst this is an appropriate site to allocate for mixed use development, modifications to the policy wording are necessary to reflect the number of dwellings indicated in the outline permission, which is addressed in **MM65**.

Three Score, Bowthorpe (R38)

201. This Council-owned site was previously allocated for housing development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from outline planning permission for 1000 dwellings, a proportion of which have now been developed. Key pieces of infrastructure have also been implemented including a spine road through the site. It is currently being developed by a Council-owned local housing company with a significant proportion of affordable housing, and given the evidence that has been presented, the delivery assumptions appear to be realistic. The site is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to correct the residual capacity of the site. This is remedied in **MM66**.

Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View (R42)

202. This is a previously developed site, the majority of which was allocated for over-55s housing in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). Part of the site now benefits from planning permission for 50 dwellings, and a masterplan for the whole site has been agreed. It is appropriate to re-allocate for residential development without modification.

Site of former Earl of Leicester Public House, 238 Dereham Road, Norwich (R33)

203. This small vacant brownfield site is allocated for 10 homes. It was previously allocated and granted planning permission. It is expected to come forward in this plan period. It is appropriate to re-allocate for residential development without modification.

Land at Lower Clarence Road (CC13), Ipswich Road Community Hub (R2) and 153 Ber Street (CC2)

204. These three sites are no longer available for development. Consequently, the allocations are not justified and should be deleted. **MM38, MM46 and MM53** achieve this.

The Urban Fringe

Colney Hall, Watton Road, Colney (GNLP0253)

205. The allocation is for a scheme of specialist housing and for research/healthcare uses. Progress has been made with the drawing up of a planning application and the evidence indicates that the site will be delivered in the Plan period. The allocation is sound, but the Policy wording needs to be modified to clarify when a masterplan would be required, that landscape and archaeological assessments will be required given the historic and heritage value of the Hall and gardens, and to address the soundness issues identified above. **MM72** makes these changes.

Land north of the A11, Cringleford (GNLP0307/GNLP0327)

206. This strategic allocation is part of a wider area of land identified for development in the Cringleford Neighbourhood Plan (2014). Planning permission has been granted for 650 dwellings on the north eastern part of the site. However, the south western part of the site did not benefit from planning permission at the time of the hearings. The proposed allocation and policy assume that this south western area will deliver an additional 410 dwellings, which would result in a total site capacity of 1,060 dwellings. Whilst Policy GNLP0307/GNLP0327 refers to 1,710 homes, that is an error and includes completions on neighbouring sites.

207. The assumed 410 dwellings on the south western part of the site represent a significant uplift on the numbers given in the Cringleford Neighbourhood Plan. However, that is due to higher densities being achieved on the north eastern part of the site, and on neighbouring sites. Moreover, the Neighbourhood Plan was made around 10 years ago before the detailed site layouts were known. Given the size of the remaining area of the site, an uplift of 410 dwellings

assumes an appropriate density for this location. In this regard, the Highway Authority has not raised any objection to this uplift on highways or network capacity grounds. In any case, the policy wording requires that a Transport Assessment accompany any future application to confirm that the proposed improvements to the A47 Thickthorn Interchange can accommodate this uplift. This will ensure that the highways implications of any detailed proposal are fully assessed.

208. At the hearings, views were expressed that the assumed number of dwellings for this site should be expressed either as a cap or as a minimum. However, we consider the Partnership's approach to be justified and sufficiently flexible to allow the precise number of dwellings to be determined at application stage, in light of a detailed scheme and supporting technical information. The site is appropriate to allocate for residential development, including for the number of dwellings envisaged. However, modifications to the policy wording are necessary to correct factual errors, remove reference to a bus route through the site, and to clarify that a landscape buffer should be provided outside of the settlement limit. These are addressed in **MM78**.

Land east of Cator Road and north of Hall Lane, Drayton (DRA1)

209. This site was previously allocated in the Broadland Site Allocations DPD (2016) and benefits from planning permission for housing development. It is currently under construction and is suitable to re-allocate for residential development, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM80**.

Land south and east of Easton (EAS 1)

210. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and benefits from planning permission for residential development. The site is under the control of a housebuilder, reserved matters approvals are in place on parts of the site, and areas are currently under construction. Based on the submitted evidence, the delivery assumptions appear to be realistic. The allocation of this site is sound in principle, subject to modifications to the policy wording to reduce its capacity to 962, as part of the site now has permission for other uses, and to address the soundness issues identified above. These are addressed in **MM81**.

Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (HEL1)

211. The allocation of this site for housing and employment uses is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM82** makes these changes.

Land at the Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (HEL2)

212. This site was allocated in the Broadland Site Allocations DPD (2016) and benefits from outline planning permission for residential development. The site is under the control of a housebuilder, reserved matters approvals are in place on parts of the site, and areas are currently under construction. Based on the submitted evidence, the delivery assumptions appear to be realistic. The site is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM83**.

Land to the west of Green Lane West, Rackheath (GNLP0172)

213. The site now has planning consent and the allocation is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM85** makes these changes.

Land at Heathwood Gospel Hall, Green Lane West, Rackheath (GNLP0351)

214. This is a small brownfield site within the village. Its allocation is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM86** addresses these.

Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (GNLP0132)

215. This is a large allocation close to an area of recently developed housing on the fringe of the city within the Growth Triangle. New housing lies to the west and south of the site.

216. The allocation of the site is sound in principle. The Policy requires provision to be made for supporting infrastructure, including the potential for a new secondary school or a new primary school. It is not known at this stage whether the secondary school will be needed and so to be effective and justified, the policy needs to be amended to refer to either option and the resulting land use requirements. Based on the evidence submitted to us during the examination, it is still appropriate to refer to the option of the school in the policy, even though some of the delivery timetable and expectations may have altered since the submission of the Plan. The policy enables a flexible approach and the triggers provide for various options. The wording is justified and effective.

217. The expected delivery on the site needs to be reduced given updated evidence from the site developer/promoter. This leads to a reduction of 660 homes being delivered on this site in the Plan period.

218. **MM87** addresses these issues.

Land between Fir Covert Road and Reephams Road, Taverham (GNLP0337R)

219. This is a large urban extension that would sit between the A1270 and the northern edge of Taverham. The site is well contained by major roads and the existing built-up area and it represents a logical extension to the settlement. There are no over-riding constraints that would prevent the development of the site, and it would be capable of providing a range of services and facilities onsite, including a local centre, open space, and land for a new primary school and medical centre. It would also benefit from facilities and public transport connections in the existing settlement. This is an appropriate site for housing development, albeit modifications to the policy wording are necessary for clarity, to address the soundness issues identified above, and to provide appropriate guidance in relation to the proposed local centre. **MM88** addresses these points.

Land off Beech Avenue, Taverham (GNLP0159R)

220. The principle of the allocation is sound. The site is suitable for housing and there are no constraints to prevent it coming forward. However, it emerged during the examination that a planning application for a slightly large area of land had been submitted and that the Partnership were considering it favourably. Broadland District Council Planning Committee has subsequently resolved to grant permission for the development. In light of this, it is justified that the site area should be enlarged to reflect the planning application boundary and the number of houses expected on it is increased from 12 to 25. The policy should therefore be modified accordingly. **MM89** addresses these points.

Land on White Horse Lane and to the rear of Charolais Close & Devon Way (TROW 1)

221. The site benefits from full planning permission for residential development and is currently under construction. It is appropriate to allocate for residential development, subject to modifications to the policy wording to remove a requirement to provide a masterplan, which is unnecessary given that the entire site now has planning permission and much of it has already been built out. This is remedied in **MM90**.

Main Towns

Land south of Burgh Road and west of the A140, Aylsham (GNLP0311, 0595 and 2060)

222. This is an allocation on the edge of Aylsham between the existing built up area of the town and the A140. It is currently farmland. It is open in character but has well defined boundaries. It and the nearby site off Norwich Road are the two Plan allocations for the town.

223. The policy for the site looks to secure a number of infrastructure related requirements including land for a new primary school. The Town Council is concerned about the impact that the development would have on the town's infrastructure capacity, highway network and environment but there is no demonstrable evidence that the allocation is not justified.

224. The allocation is sound subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM91** addresses these points.

Land at Norwich Road, Aylsham (GNLP0596R)

225. This is another site between the town and the A140. It is of a similar size to the Burgh Road site. The Town Council is concerned about the impact that the development would have on the town's infrastructure capacity, highway network and environment but there is no demonstrable evidence that the allocation is not justified. It is soundly based in principle.

226. For effectiveness, it is necessary to modify the policy wording to require the phasing plan to be submitted with or in advance of the first permission, and to modify the specified pedestrian and cycle access locations based on more recent transport evidence. These, and other modifications necessary to address the soundness issues identified above, are covered in **MM92**.

Land at Frontier Agriculture Ltd, Sandy Lane, Diss (GNLP0102)

227. This site is currently occupied by industrial uses that would need to be relocated. We consider that the site is not likely to be available as early as the Partnership and the site promoters are expecting but that it will be delivered in the Plan period. It is in an accessible location within the town, situated adjacent to the railway station. It is a sound allocation in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM93** rectifies this.

Land south of Spirketts Lane, Harleston (GNLP2108)

228. This site lies between the built-up area of Harleston and the A143. It is well connected to the town. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM94** addresses this.

Land at Spirketts Lane, Harleston (HAR 4)

229. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and the principle of development has been established. It lies to the north of allocation GNLP2108. Proposals to bring it forward for development are now being progressed by the landowner. It is sound, subject to a modification for effectiveness to remove the reference to more homes being accommodated subject to an acceptable design and layout. This reference is not necessary. **MM95** addresses this.

Land off Station Hill, Harleston (HAR 5)

230. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and the principle of development is therefore established. The evidence indicates that it is likely to come forward in this plan period. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM96** addresses this matter.

Land at Briar Farm, Harleston (GNLP2136)

231. This is an allocation on the edge of Harleston between the built up area and the A143. It is a logical and well defined extension to the settlement that is likely to deliver in the Plan period. The allocation is sound without modification.

Land at Johnson's Farm, Wymondham (GNLP0354R)

232. The site is an extension to the existing built up area on the south western side of Wymondham. Its allocation is sound in principle. The policy wording needs to be modified for effectiveness to make it clear that a masterplan and transport assessment must be submitted in advance of or with the first planning application, and to ensure that a pedestrian/cycle access point at Preston Avenue will be required. **MM101** makes these changes.

Land at Tuttles Lane, Wymondham (GNLP3013)

233. This is a reasonably small site on the northern side of the town. It is self-contained and can be easily accessed from Tuttles Lane. The allocation is sound in principle, subject to modifications which are necessary to make it clear that an ecological assessment must be submitted, given the potential need for mitigation along the River Tiffey and its tributaries. **MM102** addresses this.

Key Service Centres

Land west of Acle (GNLP0378R/GNLP2139R)

234. This is a relatively large greenfield extension to the west of the existing settlement and adjacent to a smaller allocation (ACL1) that is currently under construction. The site would be accessible to existing services, facilities, and public transport connections in Acle and would be capable of providing new areas of open space. The development of this site would allow for a new link road to be constructed between Norwich Road and South Walsham Road through the site that would bypass the centre of Acle, which currently experiences significant congestion. This is a unique benefit of the scheme. There is also no detailed evidence before us to indicate that such a requirement would make the scheme unviable or to substantiate a purported cost of £3 million. Whilst the site is subject to potential reservoir flooding in the event of a breach, the Strategic Flood Risk Assessment states that this risk is “*relatively low*”, due to the standard of inspection and maintenance required under the Reservoir Act 1975. It also states that this risk is less than either river or surface water flood risk. Moreover, mitigation measures could be secured at application stage.
235. Separately, Policy GNLP0378R/GNLP2139R requires that development address the proximity of the site to the Broads, and a further specific reference to its dark skies is therefore unnecessary. In addition, the presence of a water main within the site boundary is a matter that is capable of being dealt with at application stage. This is an appropriate site for housing development, albeit modifications to the policy wording are necessary for clarity, to ensure the link road is provided across the land ownership boundary, and to address the soundness issues identified above. These are remedied in **MM103**.

Land to the north of Norwich Road, Acle (ACL1)

236. This site benefits from planning permission for residential development, is currently under construction, and a significant number of dwellings have already been completed. The site is suitable to allocate for residential development without modification.

Land south of Acle Station, between Reedham Road and New Reedham Road, Acle (ACL2)

237. This site benefits from planning permission for residential development and is currently under construction. The site is suitable to allocate for residential development, subject to modifications to the policy wording that are necessary for effectiveness to clarify which highway improvements are required. This is remedied in **MM104**.

Land adjacent to Norwich Camping & Leisure, off Yarmouth Road, Blofield (GNLP2161)

238. This is a small brownfield site within the existing urban area that is in walking distance of existing services, facilities, and public transport connections in Blofield. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary for clarity and effectiveness, and to remove the requirement to provide “*possible alterations of former trunk road*” as this is vague and disproportionate given the number of dwellings proposed. These are remedied in **MM106**.

Land to the south of A47 and north of Yarmouth Road, Blofield (BLO1)

239. This site benefits from planning permission for residential development, is currently under construction, and a significant number of dwellings have already been completed. The site is appropriate to allocate for residential development, subject to modifications to the policy wording to correct factual errors and to address the soundness issues identified above. These are remedied in **MM107**.

Land north of Hethersett (HET 1)

240. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and benefits from outline planning permission for residential development. It is under the control of a housebuilder, reserved matters approvals are in place on much of the site, and significant areas have been developed out. The allocation also assumes an uplift of 200 dwellings over and above the capacity set out in the outline permission. This is due to the site having been developed to a higher density than originally envisaged, and the proposed uplift is supported by the developer. Based on the submitted evidence, the uplift and the site delivery assumptions appear to be realistic. The site is appropriate to allocate for residential development, although several modifications to the policy wording are necessary. These include the deletion of a requirement to comprehensively masterplan the site, which is unnecessary given much of it has reserved matters consents in place and large areas are now developed. Moreover, modifications are required to clarify that the policy

applies to all undeveloped parts of the site and not just the 200 dwelling uplift, and to remedy other soundness issues. These are addressed in **MM110**.

Land north of Grove Road, Hethersett (HET 2)

241. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) for extra care housing. It sits immediately adjacent to allocated site HET1 and the principle of development has been established. It will complement the development of that site.

242. The delivery of this site is dependent upon progress of the HET1 site to secure access through to it. Nevertheless, the evidence indicates that it is likely to come forward in the Plan period. A modification is required for effectiveness to remove an erroneous reference to the JSC in the Policy and to clarify some site-specific requirements. **MM111** addresses these issues.

Land north of Springfield Way and west of Dereham Road, Hingham (GNLP0503)

243. The site owner has requested that this allocation be deleted from the Local Plan, as they do not intend to release it for development. Accordingly, there is not a reasonable prospect that it will be available during the Plan period, and it is therefore not a sound allocation. This is remedied by **MM112** which deletes the allocation and its supporting policy.

Land south of Norwich Road, Hingham (GNLP0520)

244. The site consists of open agricultural land on the south eastern edge of Hingham. It is in easy walking distance of a nearby primary school, convenience store and bus stops, and a pedestrian route via Granary Way would connect the site to the footpath along Norwich Road. In this regard, Granary Way is a lightly trafficked cul-de-sac and the use of this shared surface route would not raise safety concerns. The walking route to Hingham centre would be more convoluted and would include narrow sections of footway and several crossings of Norwich Road. Whilst this may deter some trips to the centre, there would be a direct bus service, and the site would still have other services and facilities in easy walking distance. A vehicular access to the site is capable of being taken from Norwich Road without removing protected trees, which is accepted by the Highway Authority. The precise location of the pedestrian refuge would be determined at application stage.

245. The northwest corner of the site is subject to surface water flood risk, comprising a flow path that runs from the Industrial estate to the north, through the site, and on to land to the south west. However, only a relatively small proportion of the site itself is subject to this flood risk. Moreover, the land promoter asserts that its mitigation scheme would be capable of reducing the

existing level of flood risk experienced by land and properties to the south west. In this regard, we consider that the area of land subject to flood risk should remain within the allocation so that this mitigation can be required by the site-specific policy. The policy wording needs to be modified to require that the part of the site subject to surface water flood risk should not be built on, in accordance with the Sequential Test. These matters, and others relating to clarity and effectiveness, are addressed in **MM113**. Separately, a drainage scheme ensuring that there is no increase in run-off from the site is capable of being secured at application stage.

246. The Grade I listed St Andrews Church is located in the centre of Hingham and its tower is visible in longer views from a number of directions. In this regard, views of the tower are currently available from along parts of Norwich Road as it approaches and then as it enters Hingham. However, longer views of the church from along Norwich Road (outside of Hingham) are unlikely to be significantly affected by the allocation given the height of the tower, the topography of the area, and the likely height of any development. Views of the church as the road enters Hingham are fleeting and available predominantly to motorists, as there are no pedestrian footpaths in this location. Whilst the allocation would be visible in longer views of the church tower from along parts of Seamere Road, these views are relatively distant in nature, and boundary planting could be used to soften any impact. In our view, any effect on the setting of the St Andrews Church is capable of being dealt with at application stage. The site is also some distance from the listed buildings to the south and there would be no impact on their setting. We further note that Historic England has not objected to the allocation on these grounds.
247. The proposed allocation is opposite to an industrial estate that accommodates some B2 uses. However, it is located on the far side of Norwich Road, and there is scope to provide a further buffer within the site if that is considered necessary. In this regard, the assumed capacity of 80 dwellings would allow for significant areas of the site to be occupied by open space, planting, and flood risk mitigation. Moreover, a number of existing properties back directly onto the industrial estate, and there is no evidence before the Examination that this has resulted in an unacceptable level of noise or disturbance.
248. There would be a small loss of countryside associated with the allocation. However, the site comprises a relatively flat agricultural field that is bounded on 2 sides by the existing built up area. It is well related to the existing settlement and most views of it from the surrounding area are seen against the backdrop of existing townscape. Accordingly, the site does not comprise a 'valued landscape' and any harm to the wider landscape would be minor. Separately, whilst the site is around a kilometre from the Sea Mere SSSI, that is a matter which is capable of being dealt with at application stage.

Land to the east of Beccles Road, Loddon (GNLP0312)

249. This site comprises open land on the eastern edge of Loddon. It is well related to the existing settlement and is contained by a band of trees along its eastern edge. It is also accessible to existing services, facilities, and public transport connections in Loddon, and is not subject to any over-riding constraints that would prevent it from being developed. The allocation is sound in principle, subject to modifications to the policy wording that are necessary to address the soundness issues identified above. These are addressed in **MM115**.

Land off Langley Road, Chedgrave (GNLP0463R)

250. This site comprises open agricultural land on the northern edge of Chedgrave. It is reasonably well related to the existing settlement and is accessible to services, facilities, and public transport connections in Chedgrave. Whilst the site is raised above the existing properties to the south, the assumed capacity is low and would allow for landscaping and open space to be provided to manage this transition in levels. Any landscape harm would be localised and could be mitigated by landscaping and boundary planting. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to clarify the access requirements and for effectiveness, which are addressed in **MM116**.

Land off Broomhill Lane, Reepham (REP1)

251. This site was allocated in the Broadland Site Allocations DPD (2016) and a planning application has recently been submitted for the site. Discussions in relation to that application have led to an alternative solution with regard to the proposed sports hall which is now to be located off site. The evidence presented to us at the examination from the Partnership and the promoter was that this off-site solution was the option now being pursued. In the light of this, it is not justified to require a sports hall to be provided on site. Accordingly, modifications are necessary to remove this requirement, and to address the soundness issues identified above. **MM119** makes these changes.

252. It is appropriate that the policy expectation remains at approximately 100 dwellings even though this figure may not necessarily be consistent with the planning application before the Council. In this regard, the figure in the policy is not a cap. There is also no compelling evidence to adjust the site boundary.

Land at former station yard, Station Road, Reepham (REP2)

253. This site is located within the settlement boundary and benefits from planning permission for a care home, assisted flats, and bungalows. It is suitable to allocate for residential development without modification.

Village Clusters

Land east of Woodbastwick Road, Blofield Heath (Policy GNLP1048R)

254. The site comprises open land on the edge of the settlement that is surrounded by existing built development on 3 sides. It is in walking distance of services, facilities, and public transport connections in the village. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, a modification to the policy wording is necessary to provide clarity regarding tree and hedgerow re-provision, as some removal is likely to be required to accommodate a new access and footway. Further modifications are necessary to require appropriate ecological surveys for any protected species that may be present, and to address the soundness issues identified above. These are addressed in **MM120**.

Land to the north of Blofield Corner, Blofield Heath (BLO5)

255. This site is well related to the existing settlement and benefits from planning permission for housing development. It is suitable to allocate for residential development without modification.

Land east of Aylsham Road, Buxton with Lamas (GNLP0297)

256. This is a relatively small open site on the northern edge of the village. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to clarify imprecise requirements relating to the 30 mph speed limit area, noise and vibration arising from the railway line, and the loss of any trees and hedgerows at the proposed access point. A further modification requiring the provision of boundary landscaping is necessary to provide an appropriate edge to the settlement. These are remedied in **MM121**.

Land east of Lion Road, Buxton (BUX1)

257. This site was allocated in the Broadland Site Allocations DPD (2016) but has not yet come forward. There is a reasonable prospect that it will come forward for approximately 20 homes in the Plan period. Its allocation is justified without modification.

Land east of Gayford Road, Cawston (GNLP0293 and CAW2)

258. Site CAW2 was previously allocated for development in the Broadland Site Allocations DPD (2016), whereas site GNLP0293 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation, and they

are in the same ownership. There are no over-riding constraints that would prevent the development of the site, and it is in walking distance of services, facilities, and public transport connections in the village, including a primary school and a small convenience store. It is an appropriate site to allocate for housing development. However, it is confusing for these adjoining sites to have separate policies. Accordingly, **MM122** and **MM123** delete Policies GNLP0293 and CAW2 and combine the sites to form a single allocation. This is subject to a new policy with modified wording that incorporates changes that are necessary to address the soundness issues identified above. This is set out in **MM124**.

Land at Rectory Road, Coltishall (COL1 and GNLP2019)

259. Site COL1 was previously allocated for development in the Broadland Site Allocations DPD (2016), whereas site GNLP2019 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation. The Highway Authority does not object to the site on highway safety or access grounds, and this matter has been considered in detail during the assessment of recent planning permissions on COL1. There are no other over-riding constraints that would prevent the development of the site, and it is in walking distance of services, facilities, and public transport connections in the village, including a primary school and a convenience store. It is an appropriate site to allocate for housing development in our view. However, it is confusing for this site to be subject to 2 separate policies. Accordingly, **MM125** and **MM126** delete Policies GNLP2019 and COL1 and combine these sites to form a single allocation. This is subject to a new policy with modified wording that clarifies which highway improvements are required and addresses the soundness issues identified above. This is set out in **MM127**.

Land at Jordans Scrapyard, Coltishall (COL2)

260. The site was allocated in the Broadland Site Allocations DPD (2016) and there is an expectation that it will come forward for housing in this plan period. Its allocation is justified, subject to modifications that are necessary to address the soundness issues identified above. **MM128** makes these changes.

Land west of Foundry Close, Foulsham (GNLP0605)

261. This site is an open piece of land on the western edge of Foulsham that adjoins the existing settlement to both the south and east. It is in walking distance of services and facilities in the village, including a primary school and a small convenience store. Whilst it would be accessed via relatively narrow estate roads, it would generate only a modest level of traffic given the number of dwellings that are envisaged. In our view, the access route would be of adequate width for a scheme of this size. Moreover, the footways are clearly demarcated despite being the same height as the carriageway, and are set

within a low speed, low traffic, environment. This does not raise significant highway safety issues, and it is noted that the Highway Authority has not raised any concerns in this regard. Similarly, the low level of traffic generated by the scheme would not place any significant additional pressure on High Street.

262. Any loss of hedgerow to create an access would be small-scale and could be compensated for by new planting within the site. The presence of a ransom strip across the site access is noted but given this is owned by a housing association rather than a householder, it is unlikely to prevent development from taking place. Furthermore, given the limited number of pupils that would be generated by an allocation of this size, it would be highly unlikely to necessitate an expansion of the school. Whilst planning permission has recently been granted for housing development elsewhere in the village, that does not make the allocation unsound given the requirement for housing across the Plan area. In our view, the site is appropriate to allocate for housing development subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. This is addressed in **MM129**.

South of Bowlers Close, Freethorpe (GNLP2034)

263. This is a relatively small site that is well-contained by existing built development and a band of trees along its southern boundary. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary in relation to the boundary trees for clarity and effectiveness. Other modifications are necessary to address the soundness issues identified above. These are remedied in **MM131**.

Land north of Palmer's Lane, Freethorpe (FRE1)

264. This site benefits from planning permission for housing and has now largely been completed. It is suitable to allocate for residential development, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. These are addressed in **MM132**.

Land at Bridge Farm Field, St Faiths Close, Great Witchingham (GNLP0608R)

265. This is a relatively small greenfield site that adjoins the existing settlement to both the south and west. Whilst it is near to a County Wildlife Site, the County Council's Natural Environment Team have advised that this would not preclude development and that it is unnecessary to require a buffer to be provided within the site. There are no other over-riding constraints that would prevent the development of the site, and it is appropriate to allocate for housing development. However, detailed modifications to the policy wording are necessary for clarity and to address the soundness issues identified above, as

set out at **MM133**. Separately, whilst the site has been promoted to the GNLP by the landowner, its delivery timescales are unclear. Accordingly, the site is not included within the assumed 5 year supply.

Dog Lane, Horsford (GNLP0264)

266. This is a brownfield site within the existing built-up area. The north western part of the allocation (accounting for around 25% of the site area) is in Flood Zone 2 and it is necessary to modify the boundary to remove this land, in accordance with national policy. The requirement to maintain a 20-metre buffer between the watercourse and proposed garden areas will also reduce the net developable area. These matters necessitate a reduction in the assumed capacity to 30 dwellings. These, and other modifications that are necessary to address the soundness issues identified above, are addressed in **MM134**.

Land to the west of West Lane, Horsham St Faith (GNLP0125R)

267. The site forms part of an agricultural field on the edge of the historic village of Horsham St Faith. Whilst it is close to several designated heritage assets, including the Grade I listed Church of St Mary and St Andrew, a scheduled monument, and the Horsham St Faith Conservation Area, the site is capable of being developed without harming the settings of these assets. In this regard, it is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to ensure that nearby heritage assets are protected in line with national policy. The proposed requirement for 2 site accesses to be provided was also acknowledged to be unnecessary by the Highway Authority in the hearing sessions and so is deleted. A further modification relating to the provision of frontage footways is also necessary given that existing hedgerows may prevent a frontage footway, subject to further design work. Other detailed modifications are necessary for clarity and to address the soundness issues identified above. These matters are addressed in **MM135**. Separately, it is asserted that other developments have recently come forward in the village, however, that does not in itself make the allocation unsound given the requirement for housing across the Plan area.

Land east of Manor Road, Newton St Faith (HNF1)

268. The site benefits from planning permission for housing and is currently under construction. The site is suitable to allocate for residential development, subject to modifications to the policy wording that are necessary to clarify the highway improvements required, and to remove an unjustified reference to onsite play provision which does not feature in the planning permission. These are addressed in **MM136**.

West of Blofield Road, Lingwood (GNLP0380)

269. This site comprises open agricultural land on the edge of Lingwood. It is well related to the existing built-up area and adjoins it to both the south and east. An appropriate access can be achieved and it is noted that the Highway Authority is supportive of the allocation. It is not subject to any over-riding constraints and the allocation is sound in principle. However, modifications to the policy wording are necessary for clarity, to ensure compensatory planting for any loss of trees, and to specify the highway measures that are required. These are addressed in **MM139**.

East of Station Road, Lingwood (GNLP4016)

270. The site consists of open land on the eastern edge of Lingwood that is near to both a primary school and a train station. It is not subject to any over-riding constraints and the allocation is sound in principle. However, modifications to the policy wording are necessary for clarity and to ensure compensatory planting for any loss of trees. These are addressed in **MM140**.

Land south of Le Neve Road, Marsham (GNLP2143)

271. This site is located on the southern edge of Marsham in close proximity to the Grade I listed All Saints Church. The surrounding landscape is relatively flat and the church tower is a prominent feature in longer views from the public footpaths to the west and south west, and from Allison Street to the south. At present, most of the properties to the west of the church are bungalows that are set down in the landscape, and the village edge follows a clearly defined line that sweeps away from the church to the north west. In contrast, the proposed allocation would be on higher ground and would jut out prominently into the open setting of the church. In this regard, development of this site would introduce a discordant, elevated peninsula of modern development that would interrupt important views of the church and its tower from the west, and visually compete with it when viewed from the south or southwest. There would be a harmful effect on several existing views of the church, including those out from the churchyard itself, that would negatively affect how the building is experienced. There are no obvious design solutions that could adequately mitigate this harm, and even a smaller allocation would still result in significant negative effects. Whilst the level of harm would be 'less than substantial', the public benefits including the provision of new market and/or affordable housing and the provision of expansion land for the adjoining graveyard, would not outweigh the harm. In our view, this allocation is clearly unsound. This is remedied by **MM141** which deletes the allocation and its supporting policy.

Land to east of Station Road, Reedham (GNLP1001)

272. This site adjoins existing housing on 3 sides and has only limited visibility from Station Road. It is near to a train station and is accessible to other services and facilities in the village. Whilst walking routes to the primary school would be along roads with no dedicated footway, these are mostly quiet residential streets with limited traffic. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, a modification is required to delete part 2 of the policy, which is repetitive of part 5. It is also necessary to delete unduly prescriptive design requirements, which do not appear to acknowledge the adjoining new build estate to the west. These matters are remedied in **MM142**. Separately, the policy wording already requires that development address the proximity of the site to the Broads, and so a further specific reference to its dark skies is unnecessary.

Mill Road, Reedham (GNLP3003)

273. Policy GNLP3003 states that vehicular access to this site should be via a route onto Mill Road. However, during the hearings it emerged that areas of the front gardens on either side of this route would be required to provide adequate visibility splays. In this regard, no agreement has been reached with either landowner and one has refused to engage in discussions. Other potential access solutions would unacceptably narrow Mill Road and are opposed by the Highway Authority. Any potential route via Holly Farm Road would also be highly constrained given its narrow width, poor visibility at the junction with Mill Road, and conflict with the pedestrian access to the school. There are no obvious design solutions that could overcome these constraints. Moreover, any pedestrian route adjacent to the railway bridge parapet would have very poor visibility to oncoming traffic over the bridge. Accordingly, a safe and suitable access to this site is not achievable and it is therefore not a sound allocation for development. This is remedied by **MM143** which deletes the allocation and its supporting policy.

Land adjoining Norwich Road, Salhouse (GNLP0188)

274. This is a small site on the edge of Salhouse that is well-related to the existing village and its facilities. The site is not subject to any flood risk constraints and the Lead Local Flood Authority did not object to its allocation. Whilst the development of the site would result in the loss of open views from the properties opposite, a change of view from a private window is not in itself regarded as a planning consideration. There are no over-riding constraints that would prevent the development of the site, and it is appropriate to allocate for housing development. The site lies some distance from the conservation area boundary and it does not need to be referenced in the policy. However,

modifications to the policy wording are necessary for clarity and to remove unduly prescriptive design stipulations, which are addressed in **MM144**.

Land north of Chamery Hall Lane and rear of Burlingham Road/St Marys Close, South Walsham (SWA1 and GNLP0382)

275. Site SWA1 was previously allocated for development in the Broadland Site Allocations DPD (2016) and site GNLP0382 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation, and they are in the same ownership. The Highway Authority objects to any access from Chamery Hall Lane, and the availability of appropriate visibility splays is uncertain in this regard. There is also an existing layby and field access immediately to the west which is likely to impair visibility from any such access. In these circumstances, the policy requirement that access be taken from Burlingham Road is justified.

276. It is confusing for these adjoining sites to have separate policies. Accordingly, **MM145** and **MM146** delete Policies GNLP0382 and SWA1 and combine these sites to form a single allocation. This is subject to a new policy with modified wording which clarifies that compensatory provision for the loss of recreational space is required, and to address the soundness issues identified above. This is set out in **MM147**.

Employment Allocations

Land known as 'Site 4', Norwich Airport (GNLP1061R)

277. This is a large site within the operational boundary of Norwich International Airport. It is identified as a strategic allocation to provide aviation related uses, and given its size and location, it is appropriate to allocate for that purpose. However, modifications to the policy wording are necessary for effectiveness to correct the site area, to clarify the uses that will be permitted, and to allow a proportion of non-aviation uses consistent with a recent planning permission and the Norwich Airport Masterplan. A modification requiring a design concept masterplan to be submitted is also necessary to ensure that the site is appropriately planned, landscaped, and appropriate infrastructure provided. Further modifications are required to ensure that the site is accessible by modes of transport other than the private car, and to address other soundness issues. These are addressed in **MM33**.

Land at The Neatmarket, Hall Road (R1)

278. This brownfield site was previously allocated for development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It is located within

an established employment area and is appropriate to re-allocate for this purpose. However, part of the site has now been developed for a car showroom, and a modification to the site area is necessary to reflect this. Further modifications to the policy wording are also necessary to clarify that contributions will be required for offsite pedestrian improvements, and to address the soundness issues identified above. These are addressed in **MM52**.

Land at Holt Road, Norwich (R30)

279. The site is located between the edge of an existing commercial area and the A140. It benefits from planning permission for employment development and is appropriate to allocate for those purposes. However, modifications to the policy wording are necessary to clarify the relationship of any development to airport safeguarding measures and to address other soundness issues. These are addressed in **MM62**. Whilst the representation received at MM stage is noted, the site boundary has not been modified during the course of this examination.

Land adjacent to Norwich Research Park, Colney (Policy COL1/ GNLP0331BR & GNLP0331CR)

280. Site COL1 was previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015), whereas sites GNLP0331BR and GNLP0331CR are proposed as extensions to it. Together, these adjoining sites effectively form a single allocation. Much of the site has planning permission, and part of the COL1 site has been developed out. The site is clearly appropriate to allocate for employment purposes. However, it is confusing for these adjoining sites to have separate policies. Accordingly, **MM67**, **MM68**, and **MM69** delete Policies COL1, GNLP0331BR and GNLP0331CR respectively and these sites are combined to form a single allocation. This is subject to a new policy with modified wording to clarify the requirements in relation to highways and master planning, which are necessary given that much of the site already has outline planning permission to which an illustrative masterplan was attached. The new policy is set out at **MM70**.

Land rear/east of Institute of Food Research, Colney (COL2/GNLP0140C)

281. This is a relatively large site on the edge of an existing commercial area, that was allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015). It is suitable to allocate for those purposes, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM71**.

Longwater Employment Area, Costessey (Policy COS3/GNLPSL2008)

282. These sites comprise areas of undeveloped or under-utilised land in the Longwater Employment Area that were previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015). They are located within an established commercial area and are appropriate to allocate for this purpose. However, the site boundaries and site areas need to be modified to remove areas that have been developed out and to reflect other changes since the sites were last allocated. Further modifications to the policy wording are also necessary to clarify which uses will be permitted, and to resolve the soundness issues identified above. These are addressed in **MM74**.

Land west of Ipswich Road, Keswick (KES 2/GNLPO497)

283. This site was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and planning permission has since been granted for employment development. The site is clearly appropriate to allocate for this purpose. However, modifications to the policy wording are necessary for clarity and to address the soundness issues identified above. These are remedied in **MM79**.

South of Hethel Industrial Estate, Bracon Ash (GNLP 2109)

284. This site is positioned between existing built development and is adjacent to a much larger employment allocation (Ref HETHEL 2) to the west. The site is not subject to any over-riding constraints and is suitable to allocate for employment purposes. However, modifications to the policy wording are necessary to remove reference to the need to provide a masterplan as this is not justified for a site of this size, and to address the soundness issues identified above. This is remedied in **MM99**.

Land north of Spirketts Lane, Harleston (HAR 6)

285. The site was previously allocated for employment purposes in the South Norfolk Site Specific Allocations & Policies Document (2015). Much of the site has been granted planning permission and has now been built out and only a small area remains undeveloped. The site is appropriate to allocate for employment purposes, subject to modifications to the policy wording which are necessary to clarify that only around 0.22 ha of land remains available, and to address the soundness issues identified above. These are addressed in **MM97**.

Land south of Spirketts Lane, Harleston (HAR 7)

286. The site comprises open land between the A143 and an established industrial estate. It was previously allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015), and it remains appropriate to allocate for this purpose. However, modifications to the policy wording are necessary for clarity, to correct factual errors, and to clarify that replacement planting will be required for the loss of any trees that are removed to facilitate access. These are addressed in **MM98**.

Land South and South West of Lotus Cars, Hethel (HETHEL 2)

287. This site is a strategic allocation that adjoins existing advanced engineering premises to both the north and south, including the head office of Lotus Cars. The site provides an opportunity to accommodate advanced engineering and technology-based businesses. It was previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015) and is being actively promoted for development. It remains appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary to clarify when the site masterplan is required, and to address the soundness issues identified above. These are remedied in **MM100**.

Land at the former station yard, west of B1140, Acle (ACL3)

288. The site comprises an under-utilised piece of land adjacent to a railway line. It was allocated for employment development in the Broadland Site Allocations DPD (2016) and is appropriate to allocate for this purpose, subject to modifications to the policy wording. These are necessary to delete ineffective requirements that are purely descriptive, and to clarify the circumstances where non-B2 uses will be considered. These are addressed in **MM105**.

Land adjacent to Hingham Industrial Estate at Ironside Way, Hingham (HIN2)

289. The site consists of open land on the edge of Hingham Industrial Estate that is visually well contained by an existing band of trees. It was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015). The site is available and is not subject to any over-riding constraint. It is appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary to clarify the highways requirements, and to specify that development should avoid areas at risk of surface water flooding (which affects only a very small proportion of the site). These are addressed in **MM114**.

Land adjacent to Loddon Industrial Estate, Little Money Road, Loddon (LOD 3)

290. This site was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and planning permission has since been granted for employment development. The site is appropriate to allocate for this purpose, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. These are set out in **MM117**.

Ex MOD site, Pine Loke, Poringland (POR3)

291. The site comprises mostly open land to the rear of properties fronting Poringland Road. Two large metal lattice towers are positioned next to the site, and it is adjacent to an equestrian use. It was previously allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015), and it remains appropriate to allocate for that purpose. Given the proximity of sensitive uses, a policy criterion restricting the site to Class E(g) uses only is justified. However, modifications to the policy wording are necessary to address the soundness issues identified above, and these are set out in **MM118**.

Land at Old Railway Yard, Station Road, Foulsham (FOU2)

292. This is a brownfield site close to the edge of Foulsham that was previously allocated for employment development in the Broadland Site Allocations DPD (2016). The site is not subject to any overriding constraint, and is appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary for clarity, to address the soundness issues identified above, and to remove an unnecessary criterion that is purely descriptive. These are addressed in **MM130**.

Land east of the A140 and north of Norwich International Airport, Horsham St Faith (HNF2/GNLP0466R)

293. This site is a large strategic allocation in close proximity to the A1270. It was previously allocated in the Broadland Site Allocations DPD (2016), and now benefits from planning permission for employment development. The site is appropriate to allocate for employment purposes, although modifications to the policy wording are necessary to adjust the site area so that it reflects the planning permission boundary and the position of the A1270. A modification specifying that no more than 50% of total floorspace should be within Class E(g)(i), rather than in any one use class, is also necessary as this requirement is intended to limit traffic generation associated with office development only. Further modifications are also necessary to clarify the highway requirements and to ensure that the site masterplan is provided with or in advance of the first application. These are addressed in **MM137**.

Land at Abbey Farm Commercial, Horsham St Faith (SL2007/GNLP4061/HNF3)

294. The site comprises open land to the north and west of the existing commercial park. Part of the site was allocated for employment development in the Broadland Site Allocations DPD (2016), although part of the site represents an extension to the original allocation. The site benefits from a recent planning permission and is suitable to allocate for employment purposes. However, modifications to the policy wording are necessary to reflect the amended site area, clarify the highways requirements, and for effectiveness. These are addressed in **MM138**.

Brooke Industrial Estate, Brooke (BKE3)

295. This site is an existing industrial estate that was allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015). It is now mostly developed out and occupied by existing businesses, although there are still areas of undeveloped and under-utilised land. The site remains appropriate to allocate for employment purposes, however, modifications to the supporting text are necessary to clarify that only around 1.2 ha of land remains available, and for clarity in relation to flood risk. These are addressed in **MM148**.

Land at Dunkirk Industrial Estate (west), south of Banningham Road, Aylsham (AYL3)

296. This is an open piece of land within an established industrial estate, that was previously allocated for employment development in the Broadland Site Allocations DPD (2016). It is appropriate for re-allocation for this purpose without modification.

Land at Dunkirk Industrial Estate (east), south of Banningham Road, Aylsham (AYL4)

297. This site was previously allocated in the Broadland Site Allocations DPD (2016) and now benefits from planning permission for employment development, part of which has since been built out. It is appropriate to allocate for these purposes without modification.

Other Site Allocations and Site-specific Policies

Bawburgh and Colney Lakes (BAW2)

298. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015). The principle of the use has therefore previously been established. From the evidence presented to the examination, little progress has

been made in bringing this site forward as a country park and it is currently leased as a fishing lake. Nevertheless, the Partnership is keen to progress the site and there is a reasonable prospect that it could come forward within the Plan period, providing a valuable countryside and recreational resource for existing and future residents, as well as visitors. The allocation is sound in principle subject to modifications to the policy wording for effectiveness. **MM73** makes these changes.

Redevelopment of existing uses within the Costessey Longwater Development Boundary (COS 4)

299. The Longwater Employment Area encompasses a large commercial area that contains retail and employment uses, car showrooms, and other uses. A policy for this area is clearly necessary to control the uses that are permitted. However, modifications to the policy wording are required to clarify the criteria that would apply to the proposed loss of employment or complimentary sui generis uses, including the proposed marketing requirements. A further modification is also necessary to state that B2 and B8 uses will be permitted, which was omitted in error in the submitted version of the Plan. These matters are addressed in **MM75**.

Royal Norfolk Showground, Costessey (COS5/GNLP2074)

300. The Royal Norfolk Showground is a major visitor attraction and events location within Greater Norwich. Policy COS5/GNLP2074 recognises this and sets out criteria for development within the Showground area. Whilst the policy is clearly necessary, modifications to its wording are necessary to remove inconsistencies, and to clarify the highway requirements and the level of locally produced goods in any anchor food retail unit. These are remedied in **MM77**.

Land northeast of Reepham Road Hellesdon (HEL4/GNLP1019)

301. This is an area of land allocated for recreational open space in the Broadland Site Allocations DPD (2016). The Plan proposes to continue with this allocation. However, the landowner objects and states that the site is not available for the use proposed. There is no convincing evidence that the site can be brought forward for the proposed use in the Plan period. Therefore, despite being previously allocated, the allocation in this Plan is not justified and should be deleted. **MM84** deletes the allocation.

Redevelopment of existing hospital and science park uses within the Colney Development Boundary (COL 3)

302. This policy encompasses the wider employment area, hospital, and science park at Colney. It is a policy that featured in the previous South Norfolk Site Specific Allocations & Policies Document (2015), and it remains necessary to guide development in this area.

Restriction of employment uses at Hethel (HETHEL 1)

303. This policy area incorporates a cluster of advanced engineering and technology-based businesses, including the head office of Lotus Cars and the Hethel Engineering Centre. The policy is necessary in order to protect and encourage the growth of this important cluster of businesses.

Land west of Poppyfields, Hethersett (HET 3)

304. This is an existing allocation for open space in the South Norfolk Site Specific Allocations & Policies Document (2015). Given the development of the strategic allocation to the north of Hethersett, this site's value as open space for the local community will become greater. Its use as informal open space will also help to protect the archaeological interest on the land. The allocation is sound without modification.

Land north of Berryfields, Brundall (BRU2)

305. This site was allocated in the Broadland Site Allocations DPD (2016). However, planning permission has subsequently been granted for housing which has now been built on the site. The allocation therefore cannot be delivered and is not justified. **MM108** deletes the allocation and policy.

Land east of the Memorial Hall, Brundall (BRU3)

306. This site was allocated in the Broadland Site Allocations DPD (2016). However, planning permission has subsequently been granted for housing on this site and the allocation is therefore not justified. **MM109** deletes the allocation and policy.

Costessey Contingency Site (GNLP0581/2043)

307. This site lies on the western edge of Norwich. It is a large site of around 62 hectares. The policy provides for it to come forward as a contingency site for an urban extension including around 800 homes, open space, a local centre and education facilities. The policy sets out a trigger mechanism whereby it could

come forward. This is based on three consecutive years of completions being more than 15% below target and then a second test that the under-delivery of committed and allocated sites is a result of site-specific constraints.

308. The Framework requires planning authorities to review plans within five years following adoption. It is likely that three consecutive Annual Monitoring Reports would not be available until into mid 2026 at the earliest. If there was significant under delivery of housing, the local planning authorities would have to consider the issue as part of the review of the local plan. The second part of the proposed trigger mechanism would require evidence that the under-delivery was as a result of site-specific constraints.

309. It is not clear to us how this would work effectively and the processes and approval mechanisms which would have to be followed to confirm the contingency site could come forward. There would then need to be a planning application submitted and it would be likely to be a further few years before the site was delivering homes. At the hearings the Partnership considered it not unreasonable to assume a further two years beyond the three AMR years, before houses could be delivered. The Partnership acknowledged that, as a result, there could be five years of persistent under delivery before a house was built at the contingency site. The Partnership also indicated at the hearings that it had not done any analysis as to whether the Costessey site would actually make any material difference to an overall under delivery position. We are therefore not convinced that the trigger mechanism in the submitted Plan would actually address the issues which it is designed to resolve.

310. We have considered the alternative trigger mechanism wording set out by the site promoter in its hearing statement and in its responses to the modification consultation. We do not agree that such wording either could make the Policy effective or justified. Although this Plan is being examined under the September 2023 version of the Framework, planning decisions post adoption would be made having regard to the advice in the revised Framework. The requirement to identify and update annually a supply of specific deliverable sites to provide a minimum of five years worth of housing sites would not apply for five years post adoption. The Housing Delivery Test would also not be a consideration for the local planning authority. We do not consider that it is justified to apply a different approach solely in the case of the contingency site.

311. Furthermore, we do not agree that the delay to progress on site delivery in the Plan area as a result of nutrient neutrality issues provides a justification for this policy. In this regard, we have carefully considered the impact of nutrient neutrality on affected sites in our assessment of land supply and the trajectory, and, through a new positively worded policy in the Plan for those sites yet to come forward.

312. We also do not agree that the case for a new sixth form college provides a justification for a contingency site allocation. If a school is needed to meet growth arising from housing sites in the Plan, then provision should be made on a site with certainty, not on a site which may only be delivered should completions on housing sites in the Plan area not progress as planned. That would leave the provision of the sixth form college reliant on other housing sites failing to deliver and that cannot be a sound basis for planning.
313. The Partnership told us at the hearings that the sixth form facility was not required to meet growth needs arising from the Plan. The site promoter takes a different view. However, the evidence before us is not convincing and it seems that there is a lack of co-ordinated planning between the education authority, the local planning authority and the site owner on this matter.
314. We conclude elsewhere in this report that there is a buffer of around 11% across the whole of the Plan area. We consider that this is sufficient to mitigate any slower than expected delivery on some sites and to provide flexibility in the market. We have arrived at that conclusion through a thorough and detailed assessment of each allocation and some of the larger commitments. It is also possible that there would be other options open to the Partnership to help address under-delivery which could be considered as part of a plan review or through decisions on planning applications.
315. For the reasons set out above, we consider that there is no convincing case for the site to be allocated as a contingency site, or as the site promoter seeks, a full allocation. The Policy is not justified and not effective and it is necessary to delete it.
316. **MM76 and MM149** are therefore necessary for the Plan to be effective and justified.

Gypsy & Traveller Allocations

Land off Buxton Road, Eastgate, Cawston (Ref GNLP5004R)

317. The site consists of an area of land on the northern side of Buxton Road, within the hamlet of Eastgate. It is located within a cluster of dwellings and is partially screened in longer views by mature trees and planting. Whilst the site was originally proposed for 4 pitches, that assumes an unrealistically high density for a site of this size. In this regard, it is likely to accommodate up to 2 pitches. The proposed access would be some distance from the bend in the road to the west, and sufficient space would be available to accommodate vehicle parking within the site. Accordingly, the allocation would not raise any highway safety issues, and the Highway Authority has not objected to the allocation on these grounds.

Moreover, the site would have reasonable access to services and facilities in Cawston, which is around 1 km away.

318. This site is appropriate to allocate for Gypsy and Traveller accommodation. **MM150** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at the Oaks, Reepham Road, Foulsham (GNLP5022)

319. This site comprises an extension to the rear of an established Gypsy and Traveller site fronting onto Reepham Road. The proposed extension would have limited visibility in the surrounding area, and the site-specific policy requires that further landscaping and tree planting be undertaken. This would ensure that any impact on the landscape would be limited. Whilst the site is in a rural location, it has reasonable access to services and facilities in Foulsham, which is around 2 km away. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. In addition, the proposed extension of the site would not be of a scale that would dominate the nearest settled community.

320. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM151** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Brick Kiln Road Hevingham (Ref GNLP5027)

321. This site comprises an extension to the rear of an existing Gypsy and Traveller site. It is set back from the road and has limited visibility in the surrounding area. A small part of the site is subject to surface water flood risk, however, the site-specific policy requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. The site would take access from a relatively straight section of Brick Kiln Lane and would generate only a modest amount of traffic. Moreover, the Highway Authority has also not objected to the allocation on safety grounds. In addition, the number of pitches proposed would not be of a scale that would dominate the nearest settled community.
322. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM152** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land north of Shortthorn Road, Stratton Strawless (GNLP5019)

323. This site comprises an extension to an established Gypsy and Traveller site on Shortthorn Road that would comprise 4 additional pitches. It would not be prominent when viewed from the road and would be seen in the context of the existing Gypsy and Traveller site and other neighbouring development. Whilst the site is adjacent to mature trees and grassland, this has not prevented the development and expansion of the adjoining site. It is around 2 miles from services and facilities in Horsford, which would provide a reasonable level of accessibility. The site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM153** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Romany Meadow, The Turnpike, Carleton Rode (GNLP5020)

324. This site comprises an extension of 6 pitches to an established Gypsy and Traveller site on The Turnpike. It is in a relatively prominent position next to the B1113, although mature trees and planting along its frontage partially screen the site from the road. The site-specific policy requires that further landscaping and tree planting be provided, and this would ensure that its visual impact would be minimised. Any residual views of the site from the north east would also be seen against the backdrop of the existing site. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages. The scale of the allocation is proportionate to the existing site and its surroundings, and it would not dominate the nearest settled community, either alone or in combination with other sites. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that areas subject to flood risk be avoided.

325. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM154** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land off Upgate Street, Carleton Rode (GNLP5024)

326. This is an existing under-utilised Gypsy and Traveller site, which contains 2 pitches at present. Given its size, there is scope to increase this number to 6 within the existing site boundary. The site is surrounded by mature hedgerows which screen it within the surrounding area, and the impact on the landscape would therefore be limited. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages, including a primary school. There is no indication that the existing point of access has led to any highway safety issues, and the Highway Authority do not object to the

allocation. The scale of the site is such that it would not dominate the nearest settled community, either alone or in combination with other sites.

327. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM155** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land east of Station Lane, Ketteringham (GNLP5013)

328. This site is owned by South Norfolk Council and is currently used as a depot for refuse collection vehicles. It is a brownfield site with reasonable access to services and facilities in Hethersett. The Council is seeking to relocate the depot and the site will become available in the medium term. It is appropriate to allocate for Gypsy and Traveller accommodation for around 10 pitches, and based on the available evidence, is likely to come forward in the timescales envisaged. **MM156** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at Strayground Lane, Wymondham (Ref GNLP5028 A & B)

329. This site consists of 2 parts - a cleared area of land to the south and a smaller recycling centre to the north. The recycling centre is due to be relocated to an alternative site in 2025, and the larger cleared area has been promoted as an allocation by the landowner. Both would be accessed via Strayground Lane, which is a narrow single-track road that leads onto Whartons Lane, and the junction with the B1172. Whilst this is a narrow route, the proposed Gypsy and Traveller allocation would generate significantly less traffic than the existing recycling centre. Evidence has also been submitted to show how existing passing places could be improved. Moreover, no collisions have been recorded at the junction between Whartons Lane and the B1172 in the last 5 years.
330. In these circumstances, we consider that access matters are capable of being dealt with at the planning application stage. The Partnership and site promoter will need to work with the Highway Authority to agree the necessary highway improvements consistent with the requirements of the policy. On the basis of the evidence before us, including the position of the Partnership who have proposed this site following consultation, we consider that the principle of the allocation is justified.
331. Given the reduction in traffic that would occur compared to the existing use, the allocation would not result in any harm to the attractiveness of Strayground Lane as a walking route. The site-specific policy also requires that boundary landscaping is installed which would enhance this route compared to the

existing situation. In terms of the proximity of the level crossing to the south, Network Rail have raised no objection to the allocation on this ground. Any pollution or ecological implications of the allocation are also capable of being dealt with at planning application stage.

332. This site is appropriate to allocate for Gypsy and Traveller accommodation.

MM157 allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

333. In terms of delivery timescales, most of the site is currently disused, and the site promoter stated that they are in discussions with a provider. Whilst the recycling centre would need to be relocated to free up the smaller element, that is only likely to accommodate a single pitch. In light of the above, there is a realistic prospect that development will be delivered on the site within 5 years.

Conclusion

334. Subject to the abovementioned MMs, the site allocations are consistent with the Spatial Strategy and the evidence, are justified and effective, and can be delivered in the timescales envisaged.

Issue 8 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?

Overall Housing Supply

335. The Plan as submitted identified a total housing supply of 49,492 new homes, which provided a buffer of around 22% above the housing requirement. This supply included completions, commitments, windfalls, Plan allocations, and a contribution from the emerging SNVCHAP. As set out in this report under Issue 1, we consider that the overall housing supply is less than this at around 45,041 during the Plan period, which nonetheless provides for a significant buffer of around 11% above the housing requirement. This buffer will provide choice, flexibility, and mitigation against any under or non-delivery of housing sites within the Plan area. In addition, and as set out below, the assumed windfall allowance is very cautious and in practice is likely to be significantly exceeded.

336. During the examination, the Partnership updated its housing supply evidence to a base date of 31 March 2022. The submission of the updated evidence was at our request to ensure that the examination was based on the most up to date evidence. This provides an additional two years of housing completion data from that which is set out in the Plan. In total, it shows that there were 8,728

completions between 2018/19 and 2021/22. Updating the housing supply to 31 March 2022 has also led to an increase in extant planning permissions, from 31,452 to 34,688 dwellings. The updated supply evidence also takes account of errors and omissions and some updated information on site delivery.

337. The updated housing supply evidence also makes a change to the ratio at which student accommodation counts towards housing completions. This change now brings the ratio in line with the PPG. We consider this approach to be justified. Similarly, the proposed change in respect of how specialist older persons accommodation is converted into a housing figure is also justified.
338. As set out under Issue 7, some of the proposed housing allocations are not justified and the Plan has been modified in order to delete these sites. It is necessary to amend the housing trajectory to reflect this.
339. We have also altered certain assumptions regarding start dates, lead in times, and delivery rates on other allocations in the Plan. These assumptions are based on the evidence before us at the examination, including hearing statements, statements of common ground, industry research such as 'Start to Finish', our site visits, and answers given at the relevant hearing session. For example, the Partnership put forward updated expected delivery information for Sprowston (Ref GNLP0132) which led to a reduction in its contribution in the Plan period of 660 homes. For the larger strategic allocations such as the ENSRA, these assumptions are set out elsewhere in this report.
340. As set out above, nutrient neutrality emerged as a major issue during the examination following the receipt of a letter from Natural England in March 2022. It affects most of the Plan area, including the entirety of the Norwich urban area and the main towns of Wymondham and Aylsham, and initially led to a hiatus in the granting of planning permission for new housing. Significant work has been done on this, including the formation of a Joint Venture Company with other affected Norfolk Councils to create a trading platform for nutrient mitigation credits. It has also sought to retrofit existing Council-owned properties with water saving appliances, which has provided sufficient mitigation to allow for the development of Anglia Square to proceed. Many larger housing developments will also be capable of providing their own nutrient mitigation, as is proposed at several of the sites that are currently allocated in Area Action Plans. The Partnership has updated its Trajectory to reflect the impact of nutrient neutrality issues and based on the evidence before us and the answers given at the relevant hearing sessions, we consider this to be robust.
341. In terms of the assumed windfall allowance, this is based on an assessment of past windfall completions between 2008/09 and 2017/18 on sites of less than 10 dwellings in Broadland and South Norfolk, and on all such sites in Norwich. The gross annual rate of windfall completions was then heavily discounted in order

to produce the assumed windfall contribution. The size of this discount is such that it presents a very cautious view of future windfall delivery. In addition, an analysis has been undertaken of the types of sites that have come forward over the trend period, including conversions, sub-divisions, affordable housing exception sites, etc, which shows that such sites have come forward reliably. These sites are not generally picked up in the HELAA, which only considers land of 0.25 ha or above. Moreover, the recent expansion of permitted development rights to convert existing buildings to housing is likely to increase the rate at which windfalls come forward in the years ahead.

342. The assumed delivery from windfalls sites has been reduced compared to that set out in the submitted version of the Plan. This is due, firstly, to an assumption that no windfalls will be delivered in 2023/24 and 2024/25 due to nutrient neutrality issues, and secondly, to the updating of the housing supply to 31 March 2022, which means there are now fewer years remaining in the Plan period. We consider both of these adjustments to be robust. In these circumstances, we consider that compelling evidence has been presented that windfalls will provide a reliable source of supply over the Plan period.
343. Policy 7.5 has been modified so that it now relates solely to self and custom build housing. In this regard, there is a clear demand for this type of housing (discussed under Issue 6) and this policy will open up new development opportunities that were not previously available. In these circumstances, a contribution of 800 dwellings from this source is justified. Moreover, as the sites permitted under Policy 7.5 will be on land where housing has previously been restricted, any overlap with the assumed windfall contribution will be minimal.
344. In addition, we consider the 1200 dwellings assumed on sites to be identified in the SNVCHAP to be reasonable over the period of this Plan. Those sites are to be allocated separately in that document.
345. With regard to the larger sites with planning permission, and those allocated in Area Action Plans, we have made some alterations to the supply and delivery assumptions in addition to those proposed by the Partnership at the hearings. In particular, we have discounted any contribution from the Norwich RFU site (allocated in the Growth Triangle AAP - Ref GT13) as there is little evidence to indicate that it is still available or that a relocation site for the Club has been secured. This reduces the supply by 250 homes. In addition, the Partnership acknowledged that delivery at the North Rackheath site (Ref GT16) will be reduced by 180 dwellings due to a dampening effect caused by concurrent development of nearby site GNLP0172 by the same developer. However, based on the submitted evidence and discussions at the hearings, we consider that the delivery assumptions for the sites at Beeston Park, Land at Brook Farm & Laurel Farm, and Long Stratton, to be robust.

346. As a consequence of the above, the housing trajectory set out in Appendix 6 of the Plan needs to be amended for it to be justified and effective. Appendix 6 is therefore replaced by Appendix 4 in **MM20**.

Five Year Supply

347. The expected adoption date of the Plan means that the relevant 5 year period is 1 April 2023 to 31 March 2028. This is the most up to date housing supply information before the examination and therefore accords with the PPG that strategic policies should identify a five year supply from the date of adoption.

348. We have taken the updated evidence presented to us in the Partnership's March 2023 hearing statement which was based on September 2022 published housing supply data and which informed the hearing sessions. We have assessed each of the sites against the tests in the Framework and PPG in respect of whether they are deliverable or developable, based upon the evidence presented to us at the examination. We have also considered the impact of nutrient neutrality on the deliverability of sites in the period 1 April 2023 - 31 March 2028, as is set out in relation to the overall supply. We have also taken into account the progress made towards identifying mitigation solutions in considering the 5 year supply position.

349. We recognise that the evidence on which we rely to examine the 5 year supply position is data from September 2022 discussed and tested at the hearing session in March 2023. It is possible that circumstances on some sites may have altered since then. However, this is the most practical up to date evidence before us across the whole portfolio of sites to reach a conclusion on 5 year supply. To wait for further evidence would significantly delay the end of the examination and the adoption of the Plan. Other evidence could become out of date. There has to be a cut off, and a reliance made upon the most up to date evidence practically available to the examination. This is that position.

350. In most cases we agree with the Partnership's view on deliverability, but on some sites, we consider that the evidence does not support the site contributing to the 5 year supply. We have made reference to this in some of the site specific matters set out in Issue 7. For example, we do not consider that the 5 year supply contribution from the ENSRA is as great as the Partnership proposed.

351. In submitting the Plan, the Partnership has asked us to confirm the five year supply position. We have not been provided with evidence that the Partnership explicitly made it clear at the Regulation 19 stage that it was seeking to confirm the existence of a 5 year supply through the plan-making process as set out in the PPG. However, this was clearly set out in the submission letter and concerns in this regard were not raised by participants at the hearing sessions. The PPG is guidance, but in any event, it is clear that the Partnership has engaged positively with developers and others in assessing housing delivery

and this includes the many statements of common ground agreed on a significant number of allocations and commitments. Furthermore, those with an interest in housing delivery were able to submit statements and take part in the hearing sessions on housing supply at the examination, including to consider our specific questions on 5 year supply.

352. In accordance with the Framework, in this position, a buffer of 10% should be added. There is no need to add a further buffer. The 5 year housing requirement is 9,950 homes from 1 April 2023 to 31 March 2028. A 10% buffer takes this requirement to 10,945 homes.

353. Taking into account all of the evidence before us, we consider that the 5 years supply for the Plan area is 12,632 homes, which is a supply of 5.77 years. This is lower than the 6.05 years supply which the Partnership considered it would have. The summary table setting out the 5 year supply position is set out in the replacement Housing Trajectory annexe which **MM20** addresses.

Supply of Gypsy and Traveller Sites

354. The need for 52 Gypsy and Traveller pitches set out in the GTAA is disaggregated as follows: 30 in years 1-5, 10 in years 6-10, and 12 in years 11-16 of the Plan. Sites that are capable of accommodating 38 pitches have been identified to meet the 5 year requirement. In this regard, Joint Delivery Statements have been agreed with the landowners for each of the proposed Gypsy and Traveller allocations that support the Partnership's delivery assumptions. Based on these, the other submitted evidence, and the discussions that took place at the hearings, we are satisfied that these sites are deliverable. The Plan will therefore be able to demonstrate a 5 year supply of Gypsy and Traveller pitches upon adoption.

355. Beyond the 5 year period, the Council-owned Ketteringham Depot is allocated as a site that will become available in the medium term. This timescale is to allow for the depot to be relocated and is supported by a Joint Delivery Statement agreed with the landowner. In our view this is a developable site. In terms of the windfall allowance that is proposed, this is supported by historic rates of windfall delivery that show a consistent pattern of unanticipated sites coming forward. The proposed criteria-based approach in Policy 5 would also allow windfall sites to continue to come forward in the future. Windfalls are only assumed to contribute to the later years of the Plan period and at a rate of 1-2 per year. This is a cautious approach, and we are satisfied that compelling evidence exists that windfalls will continue to provide a reliable source of supply.

356. Including the windfall allowance, the Plan identifies a total supply of 60 pitches to meet the requirement, which includes a modest buffer to allow for choice and

under-delivery at any of the allocated sites. This approach is positively prepared, justified, likely to be effective, and consistent with national policy.

Conclusion

357. On the basis of the evidence before us, and subject to modifications, the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy. The Plan, with modifications, provides both a plan period and five-year supply of housing sites.

Issue 9 – Will the Monitoring Framework provide a sound and effective basis for monitoring of the Plan?

358. The Monitoring Framework in the submitted plan is based on themes and indicators. However, to be effective it needs to set out targets, triggers, and actions. **MM19** replaces the Monitoring Framework in the submitted Plan with the revised version which we consider provides a sound and effective basis for monitoring the Plan.

Overall Conclusion and Recommendation

359. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted in accordance with Section 20 (7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

360. The Partnership has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Greater Norwich Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

361. We conclude that if adopted promptly (with the recommended MMs) the Plan establishes a five-year supply of deliverable housing sites for the Plan area. Accordingly, we recommend that in these circumstances the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan in accordance with paragraph 75 and footnote 40 of the Framework.

Mike Worden and Thomas Hatfield

This report is accompanied by Appendices containing the MMs.

Annex 2 – Site Allocations in Norwich

GNLP Reference	Planning Application Reference	Location	Address	Site Size (Ha)	Use	Total Dwellings	Likely delivery
STR.01	12/00875/O (Bracondale Deal Ground)	East Norwich Strategic Regeneration Area (SRA)	Bracondale / King Street, Carrow Works and Carrow House	48.57	Strategic Regeneration Site	3,362	2025/26 - 2038 and beyond
STR.02	22/00434/F (Approved July 2023)	North City Centre SRA	Anglia Square	4.79	Residential led mixed-use	800	2024/25-2027/28
NCC.14		North City Centre SRA	Duke Street, former EEB site (Dukes' Wharf)	0.83	Mixed-use	100	2029/30-2030/31
NCC.15	18/01552/F	North City Centre SRA	Duke Street, land adjoining Premier Inn and River Wensum	0.12	Residential led mixed use / Student Accommodation	140 bed student accommodation	2028/29
NCC.16		North City Centre SRA	Friars Quay / Colegate, Car Park	0.13	Residential	25	2029/30
NCC.17		North City Centre SRA	Muspole Street, St Georges Works,	0.55	Residential led mixed-use	55	2027/28-2028/29
NCC.20	09/00296/F (17 dwellings)	North City Centre SRA	Land at 140-154 Oak Street and 70-72 Sussex Street	0.27	Residential	27	2028/29 - 2029/30
STR.04	12/00703/O 13/02089/VC 19/00978/MA	Bowthorpe/Costessey Strategic Urban Extension	Three Score, Bowthorpe	25.29	Urban extension	755	2022/23 - 2034/35
NCC.01	18/01286/F	City Centre	Land at Whitefriars	1.61	Residential led mixed-use	220	2024/25-2026/27
NCC.02	15/01927/O	City Centre	Land at Barrack Street	2.17	Residential led mixed-use	200	2034/35-2037/38
NCC.03		City Centre	Rose Lane and Mountergate, land at	1.2	Mixed-use	50	2036/37 - 2037/38
NCC.04		City Centre	Mountergate / Prince of Wales, land at	2.39	Mixed-use	200	2028/29 - 2031/32
NCC.05		City Centre	Thorpe Road: 13-17 Norwich Mail Centre	1.52	Residential led mixed-use	150	2035/36 - 2037/38
NCC.06	11/02104/O, 13/01270/RM, 17/01091/F	City Centre	Kerrison Road, Carrow Quay; land north of (permission), Norwich City Football Club (part) Groundsmans Hut (allocation & permission)	2.23	Mixed-use	323	2022/23 - 2023/24
NCC.07	22/00273/F	City Centre	Argyle Street	0.32	Residential	15	2025/26
NCC.08		City Centre	King Street, King Street Stores	0.21	Residential	20	2031/32
NCC.09		City Centre	King Street, 125-129, 131-133 and Hobrough Lane	0.35	Residential led mixed-use	20	2029/30 - 2030/31

NCC.10		City Centre	Garden Street, land at	1.08	Residential led mixed-use	100	2032/33 - 2036/37
NCC.11		City Centre	Ber Street, 10-14	0.11	Residential	10	2025/26
NCC.12	18/00437/F 19/01405/MA	City Centre	Queens Road and Surrey Street, land east of Sentinel House	0.38	Residential / Student Accommodation	252, bed student accommodation	2024/25
NCC.13		City Centre	Bethel Street, land to rear of City Hall	0.4	Mixed-use	20	2031/32
NCC.18		City Centre	Westwick Street Car Park	0.3	Residential	30	2030/31
NCC.19		City Centre	Duke Street, St Marys Works	1.05	Mixed-use	150	2028/29 - 2030/31
STR.03		Remainder of City	Land known as 'Site 4', Norwich Airport	42.46	Airport related employment and general employment	N/A	No forecasting data available
NOS.01	18/00372/O	Remainder of City	Bowthorpe Road, Norwich Community Hospital Site	5.3	Hospital development / mixed-use	200	2030/31 - 2034/35
NOS.02		Remainder of City	Dereham Road, Site of former Earl of Leicester PH, 238a	0.14	Residential	10	2029/30
NOS.03	06/00166/F (extant)	Remainder of City	Land at Ketts Hill and east of Bishop Bridge Road	1.65	Residential	80	2029/30 - 2033/34
NOS.04		Remainder of City	Gas Hill, Gas Holder	0.3	Residential	15	2030/31
NOS.05		Remainder of City	Thorpe Road, land west of Eastgate House	0.19	Residential	20	2028/29
NOS.06		Remainder of City	City Road, 24, John Youngs Ltd	0.89	Residential	45	2036/37 -2037/38
NOS.07		Remainder of City	Land at The Neatmarket, Hall Road	3.45	Employment	N/A	No forecasting data available
NOS.08	19/00911/F (50 dwellings)	Remainder of City	Bluebell Road, Bartram Mowers site (remainder of allocation)	3.4	Residential	100	2022/23-2027/27
NOS.09		Remainder of City	Land adjoining the Enterprise Centre at Earlham Hall	1.29	University Related uses and employment	N/A	No forecasting data available
NOS.10	15/00121/F 16/00099/MA	Remainder of City	Bluebell Road (UEA, land north of Cow Drive)	0.89	UEA campus-based student accommodation	400 bed student accommodation	2033/34
NOS.11		Remainder of City	Land between Suffolk Walk and Bluebell Road	3.96	University related development	N/A	No forecasting data available
NOS.12		Remainder of City	UEA Grounds Depot	1.6	UEA campus-based student accommodation	400 bed student accommodation	2035/36

NON.01		Remainder of City	Land at Holt Road	1.33	Employment	N/A	No forecasting data available
NON.02		Remainder of City	Hurricane Way	2.28 & 0.26	Light industrial employment and housing	30	2036/37 - 2037/38
NON.03	18/00917/O 19/01031/RM	Remainder of City	Constitution Hill, Constitution Motors	0.27	Residential	12	2025/26
NON.04	19/00971/F 20/01156/VC	Remainder of City	Windmill Road, land north of	0.19	Residential	17	2025/26
NON.05	18/01772/F 20/01624/MA	Remainder of City	Mousehold Lane, Start Rite Factory site	0.86	Residential	121 bed student accommodation	2022/23 - 2024/25
NON.06		Remainder of City	Dibden Road, Van Dal Shoes and car park	0.54	Residential	25	2030/31
NON.07	18/00952/O (19) 18/00271/F (9)	Remainder of City	Starling Road, Industrial sites; remainder of allocation	0.27	Residential	28	2024/25
NON.08		Remainder of City	Waterworks Road, Heigham Water Treatment Works	1.37	Residential led mixed-use	60	2033/34 - 2034/35
NON.09		Remainder of City	Mile Cross Depot	4.4	Residential	170	2024/25 - 2028/29

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Committee name: Sustainable development panel

Committee date: 27/02/2024

Report title: Draft Statutory Biodiversity Net Gain Supplementary Planning Document

Portfolio: Councillor Fulton-McAlister, cabinet member for regulatory services

Report from: Head of planning and regulatory services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To present information on statutory Biodiversity Net Gain and the contents of the draft Statutory Biodiversity Net Gain Supplementary Planning Document.

Recommendation:

It is recommended that Sustainable Development Panel authorise public consultation on the Draft Statutory Biodiversity Net Gain Supplementary Planning Document.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich is a sustainable and healthy city corporate priority

This report addresses the following priorities the Corporate Plan: reduce carbon emissions, protect the environment and adapt to climate change; and protect and invest in our parks, green spaces and biodiversity.

This report helps to meet the strategic objectives of the Biodiversity Strategy 2022-2032, and multiple actions from the Biodiversity Development Plan.

Report details

Biodiversity Net Gain

1. The Environment Act 2021 introduced the concept of statutory Biodiversity Net Gain (BNG) which requires that relevant developments must deliver at least 10% net gain in site biodiversity compared with its pre-development biodiversity level. BNG applies to all major development planning applications (except exempt development) made on or after 12 February 2024. BNG applies to all other minor development planning applications (except exempt development) made on or after 2 April 2024.
2. Applicants will need to submit a calculation of the pre-development biodiversity value of their site with their planning application along with plans showing the locations of habitats on the site. The calculation must be done using the statutory biodiversity metric.
3. If the planning application is approved, all planning applications subject to BNG will include a general biodiversity condition on the decision notice that requires the submission and approval of a Biodiversity Gain Plan (BGP) prior to commencement of development. The BGP should set out a post-development calculation of biodiversity value and proposed mitigation and enhancement measures to achieve at least 10% BNG. Significant on-site BNG and all off-site BNG needs to be secured for 30 years by legal agreement.
4. Not all development and planning applications are subject to the BNG requirement, and the government has produced a list of exempt development and application types.
5. All references to BNG in this report refer to statutory BNG. The Supplementary Planning Document (SPD) referred to in this document relates to statutory BNG only and relates to Policy 3 of the GNLP in so far as statutory BNG applies. Further work is anticipated to assist with the implementation of non-statutory BNG covered by Policy 3.

Existing Policy Context

6. Protecting and enhancing biodiversity through development proposals is already a part of the [National Planning Policy Framework \(NPPF\)](#) (paragraphs 180(d) and 186 (d)) however, the Framework does not specify the amount of enhancement that should be provided. The NPPF also already affords protection to specific designations such as irreplaceable habitats.
7. The current local plan for Norwich is made up of the [Joint Core Strategy \(JCS\) for Broadland Norwich and South Norfolk \(2014\)](#), the [Norwich Site Allocation Policies Local Plan](#) (Site Allocations Plan), and the [Norwich Development Management Policies Local Plan](#) (DM Policies Plan). BNG is a new concept and is therefore not referred to in the currently adopted local plan documents. However, policy 1 of the JCS sets out that development will protect, maintain, restore and enhance environmental assets, expand and link valuable open spaces of biodiversity importance to create green links, minimise fragmentation of habitats and contribute to a multi-functional green network. Policies DM3 and DM6 of the DM Policies Plan outline that all new development will be expected to make appropriate provision to safeguard and enhance habitats and create a biodiversity-rich environment, and that development will be

expected to avoid harm to and protect and enhance the natural environment of Norwich, including both sites and species.

8. Once adopted, the [Greater Norwich Local Plan](#) (GNLP) will replace the JCS and the Site Allocations Plan for Norwich (adoption anticipated March 2024). Therefore, information pertaining to the JCS will not be included in the adoption versions of BNG documents. Policy 3 of the GNLP sets out that development proposals will be required to conserve and enhance the natural environment through appropriate design and avoiding harm to natural assets and should have regard to delivering local green infrastructure strategies. It also sets out that at least 10% BNG must be demonstrated as part of development proposals.
9. In 2019, the council declared a climate and environmental emergency in acknowledgment of the importance of and connection to our ecosystems. This has formed key policy priorities for the council and has become an integral part of the council's [2040 City Vision](#). The council has also produced a [Biodiversity Strategy](#) which commits to create a city where biodiversity can recover and thrive, halt species decline and increase species abundance by 2030.
10. The council is also involved in the production of several evidence studies which will help inform the delivery of BNG on development sites. The council commissioned The Norwich Biodiversity Baseline Study 2024, which is now complete, and the Greater Norwich authorities are also updating their Green Infrastructure (GI) Strategy. The GI strategy is currently in preparation and is currently anticipated for completion by the end of 2024.
11. [Local Nature Recovery Strategies](#) (LNRS) also became a new statutory requirement under the Environment Act 2021. LNRS will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. There will be 48 strategy areas which altogether will cover the whole of England. Norfolk County Council have been appointed for producing the LNRS for our area. The early stages of LNRS preparation is underway but not anticipated for completion until 2025.

The Norwich Biodiversity Baseline Study 2024

12. At the end of 2022, the council commissioned Norfolk County Council to produce a biodiversity baseline study for Norwich. The key drivers for this commission were needing to understand the existing state of biodiversity in Norwich before the implementation of mandatory BNG and that the Norwich City Council Biodiversity Strategy and Development Plan identified needing a baseline assessment as one of its actions. This is a key evidence base which sets out what the existing biodiversity baseline is in Norwich, with information on key species, and threats to biodiversity. The study outlines opportunity areas within Norwich and includes some site-specific biodiversity recommendations.
13. The baseline study is largely a desk-based assessment of biodiversity in Norwich. Significant amounts of data and information already exist through NBIS records, Norfolk Wildlife Trust records, open access data, and information from local recorders and volunteer groups. The baseline study brings this all together into a single assessment of the biodiversity baseline. Some site-based assessments were undertaken on key sites where additional information was required.

14. The study identifies that Norwich has a good variety of habitat types and recorded species and contains many protected sites for both biodiversity and geodiversity. It has produced a suite of maps to spatially represent the data, including a hotspot map which shows areas of highest biodiversity value. The study has also developed Biodiversity Character Areas (BCAs), which are based on shared biodiversity characteristics and themes and give a strategic overview of biodiversity in Norwich. BCAs are also useful tools to help determine the most appropriate actions for biodiversity in the most appropriate locations.
15. The study has also produced a Survey and Monitoring Framework. This sets out recommendations for filling in any data gaps identified in the baseline study, actions for monitoring biodiversity changes and measuring conservation success.
16. Both the baseline study and the survey and monitoring report conclude with a set of key recommendations. These recommendations are not solely actions for Norwich City Council but apply to a wide range of stakeholders including other local public and private organisations, national organisations, volunteers, and local community groups. The recommendations are a set of opportunities and will need to undergo feasibility work to shape future priorities and resource allocation.
17. The biodiversity baseline study and survey and monitoring framework are important evidence documents in the implementation of BNG as they provide useful background information that can be used both in the design of development and in decision-making.

Draft BNG Supplementary Planning Document

18. The Draft BNG Supplementary Planning Document (SPD) has been produced to:
 - support the implementation of national regulations and policy in relation to statutory BNG;
 - support local policy in the GNLP (shortly to be adopted) in so far as statutory BNG applies;
 - build on best practice guidance and government advice;
 - set out the priorities for biodiversity in Norwich to ensure development is delivering the right protections and enhancements in the right places;
 - to support applicants in gaining planning permission by setting out expectations in relation to BNG;
 - and to build knowledge around biodiversity enhancement.
19. It was originally intended for the BNG document to take the form of a guidance note as Norwich City Council does not currently have an adopted BNG policy. The intention was to convert this guidance into an SPD at a later date following adoption of the GNLP. However, due to delays in programme timetables, the BNG document would be adopted after the anticipated adoption of the GNLP, which does include policy 3 pertaining to BNG. The decision has been made to

produce an SPD to support this policy, in so far as statutory BNG applies, instead of informal guidance as it will have greater weight in decision making, and negates the need for further periods of consultation to convert guidance into an SPD.

20. The SPD will be subject to statutory consultation prior to adoption by the council and as such will be a material consideration relevant to the determination of planning applications.

21. The following summarises the main sections of the draft SPD:

a) Purpose and status

Sets out the reasons for producing the document and how it should be considered in decision-making.

b) Policy context

Outlines the national and local legislation, policy and guidance relevant to BNG and the planning process, and how the draft SPD sits within that existing framework. This section also considers emerging work and how the SPD is expected to interact with and inform this going forwards.

c) Biodiversity in Norwich

Summarises key information and findings from the Norwich Biodiversity Baseline Study 2024 and includes maps extracted from the study showing Norwich's existing natural assets, biodiversity hotspots and the newly developed Biodiversity Character Areas.

d) Introduction to the mandatory BNG requirement

Sets out the key BNG principle of achieving at least 10% BNG, the wording of the general biodiversity condition that will be applied to decision notices of all relevant planning permissions, the dates which BNG becomes mandatory, and links to development and application types exempt from BNG.

e) BNG in the planning process

Includes a flowchart expressing simplified information on how BNG works through the planning process starting from design of development through to the post-construction phase and monitoring.

f) General principles for BNG

Sets out some key principles for BNG that can apply across the planning process. This includes signposting to good practice principles and the British Standard for designing and implementing BNG and encouraging applicants to engage in the council's pre-application process.

This section signposts to the biodiversity gain hierarchy which sets out the order of preference of how BNG should be delivered. The hierarchy emphasises that on-site gains should be considered first, followed by off-site gains (which must be registered on the Natural England register) and purchasing statutory biodiversity credits as a last resort.

This section also introduces the statutory biodiversity metric which should be used to calculate biodiversity value for planning applications. The biodiversity metric allows uplifts to calculated biodiversity units if habitats and their locations are deemed to be strategically significant. This is important because it ensures that the loss of those habitats is appropriately compensated for, but also recognises the value of any newly created strategically significant habitats.

National guidance outlines that strategically significant locations should be determined using local strategies and the SPD specifies that the Norwich Biodiversity Baseline Study 2024 should be used for this purpose. The SPD sets out the methodology to be used and references resources in the appendix to assist with its application.

g) Information required to support a planning application

Outlines the information required by the national regulations to be submitted with a planning application and an application to discharge the general biodiversity condition, including links to more detailed government guidance where relevant. This section also includes a list of information that the city council strongly encourages applicants to submit with their applications. At present, relatively minimal information is required to be submitted up front. This list aims to provide planners with greater confidence that the BNG requirement can be achieved, and also to better advise applicants earlier in the process if there are likely to be other issues to consider, such as requiring a legal agreement to secure the BNG.

h) Delivery of BNG

Includes a description of what on-site and off-site BNG delivery is and in which cases it is likely that a legal agreement will be required to secure the BNG. This section also signposts to government guidance on using registered off-site gains and how to purchase statutory biodiversity credits. Information is also provided on how the management and monitoring of BNG should be undertaken.

This section of the SPD is less detailed than other sections as information on monitoring and enforcement processes and responsibilities within the council are yet to be decided. Instead, this section has been kept brief, with general information that the council can charge a fee for BNG monitoring, charges which would be determined at a later date.

i) Appendix with resources for biodiversity metric

Includes resources extracted from the Norwich Biodiversity Baseline Study 2024 to assist in the application of strategic significance uplift in biodiversity metric calculations. This includes a decision tree and worked example scenarios to explain the approach, along with supporting information on maps and appropriate habitats.

22. In accordance with the council's Statement of Community Involvement, the SPD needs to undergo a statutory consultation for a minimum period of 4 weeks. The proposed timeline is to commence the consultation period 28

February 2024 which will run to 27 March 2024. The SPD will be reviewed in light of any comments received during the consultation, and an amended final version will be reported back to Sustainable Development Panel, followed by cabinet in June 2024.

Conclusion

23. Statutory BNG requires that all major applications made on or after 12 February 2024 (or 2 April 2024 for small sites), subject to exemptions, will need to achieve at least a 10% net gain in the biodiversity value of a site compared to its pre-development biodiversity value.
24. The city council has produced a draft BNG SPD to provide additional guidance and information on implementing BNG through the planning process, to assist applicants with their planning application submissions and planners in decision-making.
25. The Norwich Biodiversity Baseline 2024 is a key evidence base for implementing BNG in Norwich and identifies the city's existing natural assets, threats and opportunities for future protection and enhancement. This can be used to support the implementation of BNG in Norwich, and specific resources and methodologies developed through this work are referred to in the BNG SPD.
26. The recommendation is for Sustainable Development Panel to authorise public consultation on the draft BNG SPD. This will run for a period of 4 weeks in accordance with the council's Statement of Community Involvement. Following this, any amendments will be made to the SPD and will be reported back to Sustainable Development Panel, followed by Cabinet for adoption.

Consultation

27. Officers across the council have been consulted throughout the development of the Norwich Biodiversity Baseline Study 2024 and have been given the opportunity to comment on the draft BNG SPD.
28. The relevant portfolio holders for Regulatory Services, Climate Change and Communities and Social Inclusion have been briefed on this report.

Implications

Financial and resources

29. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
30. The preparation of this report and the draft BNG SPD (including public consultation) are considered day-to-day activities of the planning policy team and therefore has been accounted for in the planning policy budgets for the relevant periods.
31. The Biodiversity Baseline Study was commissioned using grant funding from DEFRA to assist in activities in preparation for mandatory Biodiversity Net Gain. The total cost of this study was covered by the grant funds.

Legal

32. Biodiversity Net Gain will become a mandatory requirement for relevant applications made on or after 12 February 2024 (or 2 April 2024 for small sites) (subject to exemptions) as introduced by: The Environment Act 2021, The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023, The Biodiversity Gain Site Register (Financial Penalties and Fees) Regulations 2023, The Biodiversity Gain Site Register Regulations 2023, The Biodiversity Gain Requirements (Exemptions) Regulations 2023, The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2023, and The Biodiversity Gain (Town and Country Planning) Modifications and Amendments) (England) Regulations 2024.
33. Any significant on-site and all off-site BNG must be secured via a legal agreement for a period of 30 years.
34. The Draft BNG SPD will undergo public consultation for a period of 4 weeks, aiming to start on 28 February 2024 and running to 27 March 2024. The end of this consultation period overlaps marginally with the pre-election period which commences 25 March 2024.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	An EqIA has been appended to this report. The EqIA concludes there are no implications arising from this report.
Health, social and economic impact	No implications arising from this report.
Crime and disorder	No implications arising from this report.
Children and adults safeguarding	No implications arising from this report.
Environmental impact	<p>BNG will have a positive impact on the environment by requiring development proposals to achieve at least 10% net gain in biodiversity.</p> <p>This report details an SPD, and a background evidence base which provide more detailed and up to date information on biodiversity in Norwich. This information can be used in the design of new development and will enable more informed decision-making.</p>

Risk management

Risk	Consequence	Controls required
Not authorising consultation on the Draft BNG SPD.	<p>Delays would reduce the amount of time available for the consultation before the pre-election period commences. This could result in delay to adoption of the SPD which could have implications on planning decision making.</p> <p>OR</p> <p>The SPD cannot be adopted without being subject to public consultation. This would result in a lack of information and guidance for applicants and planners in decisions making.</p>	Officers across the council, relevant portfolio holders and Executive Leadership Team have been briefed on the draft SPD and evidence base to ensure any questions/issues are picked up at an early stage to minimise the risk of not gaining authorisation to consult.

Other options considered

35. One alternative option is not to produce an SPD. This option is not recommended as the SPD provides additional and detailed information to assist with the effective implementation of BNG in Norwich. Without this information, implementing BNG through the planning application process is likely to prove more challenging and time consuming.
36. Another alternative option is to produce an informal BNG guidance note. This is not recommended as informal guidance is given less weight in planning decision making. In addition, it is likely that any informal guidance would need to be converted to an SPD. This would require a further period of public consultation and reporting and is therefore not considered the most efficient process.

Reasons for the decision/recommendation

37. BNG will become mandatory for major development (subject to exemptions) on 12 February 2024. The Draft Statutory Biodiversity Net Gain SPD has been prepared to provide information to applicants on how BNG works in the planning process, and to provide additional detail and clarity for decision-making. Without this SPD, it is likely that implementing BNG through the planning process will be more challenging and time consuming. Supplementary Planning Documents are required to go through a period of public consultation prior to adoption.

38. Therefore, the recommendation is to note the contents of this report and authorise the public consultation period on the Draft Statutory Biodiversity Net Gain SPD.

Background papers:

None

References:

[Norwich Biodiversity Baseline Study 2024](#)
[Appendices](#)
[Annexe 1 & Annex 2](#)
[Supporting Information](#)

Appendices:

Appendix 1 – Draft Statutory Biodiversity Net Gain Supplementary Planning Document
Appendix 2 – Executive Summary of the Norwich Biodiversity Baseline Study 2024
Appendix 3 – EqIA for the Draft Statutory Biodiversity Net Gain Supplementary Planning Document

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Statutory Biodiversity Net Gain Supplementary Planning Document



NORWICH
City Council

February 2024 DRAFT

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1. Introduction

- 1.1** Biodiversity is the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them ([JNCC, 2022](#)). Biodiversity matters for our environment to function, but also because it helps to provide essential environmental, social and economic services including climate regulation, food production, and supporting human health and wellbeing.
- 1.2** Norwich City Council is proud of our beautiful, unique and diverse city and its natural environment. In 2019, the council declared a climate and environmental emergency in acknowledgment of the importance of and connection to our ecosystems. This has formed key policy priorities for the council and has become an integral part of the council's [2040 City Vision](#). The council has also produced a [Biodiversity Strategy](#) which commits to create a city where biodiversity can recover and thrive, halt species decline and increase species abundance by 2030. As part of its preparation of the joint [Greater Norwich Local Plan](#) (GNLP), the city council also committed to the implementation of biodiversity net gain, prior to the government's mandatory requirement. Work done to date sets the tone for greater aspiration for the protection and enhancement of biodiversity in Norwich.
- 1.3** Development can impact biodiversity through loss of natural habitat. One key mechanism for protecting and enhancing biodiversity is through the planning and development process. Effective local planning policies, implementation of national legislation and well-designed places will help to bring numerous benefits for the protection and enhancement of biodiversity.
- 1.4** The introduction of statutory Biodiversity Net Gain (BNG) for new developments was introduced by the [Environment Act 2021](#). The concept of statutory BNG requires that all relevant developments must deliver at least 10% net gain in site biodiversity compared with its pre-development biodiversity level. This document is intended to assist in implementation of these strengthened responsibilities and forms one part of a suite of measures that Norwich City Council is employing to address the climate and environmental emergencies in Norwich.
- 1.5** All references in this document to BNG refer to statutory BNG.

2. Purpose and status of this document

- 2.1** The key objectives of this Supplementary Planning Document (SPD) are:
- To support the implementation of national legislation and policy in relation to statutory BNG;
 - To support local policy in the Greater Norwich Local Plan in so far as statutory BNG applies;
 - To build on best practice, government advice and other standards relating to BNG;

- To set out the priorities for biodiversity in Norwich to ensure development is delivering the right protections and enhancements in the right places;
- To support applicants in gaining planning permission by clearly setting out expectations for development proposals in Norwich with regard to biodiversity;
- To build knowledge around biodiversity protection and enhancement, and to explain new terminology and processes.

2.2 Following the adoption of the GNLP (March 2024), Norwich City Council will have adopted policy relating to BNG in GNLP Policy 3. This Supplementary Planning Document (SPD) is intended to supplement this policy in so far as statutory BNG applies and provides additional local information. Guidance on the full application of GNLP Policy 3 will be available in due course.

2.3 This SPD will be subject to public consultation prior to adoption. Following adoption, the SPD be a material consideration relevant to the determination of planning applications.

3. Policy Context

3.1 Protecting and enhancing biodiversity through development proposals is already a part of the [National Planning Policy Framework](#) (NPPF) but the Framework does not specify the amount of enhancement that should be provided. The Environment Act 2021 specifies that all relevant development must ensure at least 10% BNG compared with the pre-development value of the site. The government has also published numerous [statutory instruments and regulations](#) to implement the BNG requirement.

3.2 [Local Nature Recovery Strategies](#) (LNRS) were also introduced through the Environment Act 2021. These will be a spatial tool for nature recovery across England and are expected to set out key areas where there is opportunity for habitat enhancement and creation. It is expected that BNG achieved through new development will contribute to this strategic nature recovery network. Norfolk County Council have formally been appointed as the responsible body for producing an LNRS in our region and will do this jointly with Suffolk County Council. The LNRS for Norfolk and Suffolk is anticipated for completion in 2025.

3.3 The current local plan for Norwich is made up of the [Joint Core Strategy](#) (JCS) for Broadland Norwich and South Norfolk (2014), the [Norwich Site Allocation Policies Local Plan](#) (Site Allocations Plan), and the [Norwich Development Management Policies Local Plan](#) (DM Policies Plan). BNG is a new concept (see para 4.1) and is therefore not referred to in the currently adopted local plan documents. However, policy 1 of the JCS sets out that development will protect, maintain, restore and enhance environmental assets, expand and link valuable open spaces of biodiversity importance to create green links, minimise fragmentation of habitats and contribute to a multi-functional green network. Policy DM3 of the DM Policies Plan outlines that all new development will be expected to make appropriate provision to safeguard and enhance habitats and create a biodiversity-rich

environment, and policy DM6 sets out that development will be expected to avoid harm to and protect and enhance the natural environment of Norwich, including both sites and species. This demonstrates that the new BNG requirement will strengthen Norwich City Council's existing commitments to the environment.

- 3.4** Norwich City Council, along with Broadland and South Norfolk District Councils (the Greater Norwich authorities), is currently preparing [the Greater Norwich Local Plan](#) (GNLP), which is due to be adopted in March 2024. Once adopted, the GNLP will replace the JCS and the Site Allocations Plan for Norwich. Policy 3 of the GNLP sets out that development proposals will be required to conserve and enhance the natural environment through appropriate design and avoiding harm to natural assets and should have regard to delivering local green infrastructure strategies. It also sets out that at least 10% BNG must be demonstrated as part of development proposals.
- 3.5** The council is also involved in the production of several evidence studies which will help inform the delivery of BNG on development sites. The council commissioned The Norwich Biodiversity Baseline Study 2024. This is a key evidence base which sets out what the existing biodiversity baseline is in Norwich, with information on key species, and threats to biodiversity. The study outlines opportunity areas within Norwich, and includes some site specific biodiversity recommendations. The Greater Norwich authorities are also updating their Green Infrastructure (GI) Strategy. This strategy will baseline the existing GI in the Greater Norwich area and undertake an assessment of both natural and recreational places to understand if the level of GI provision is appropriate for current and future populations. The GI strategy is currently in preparation and is currently anticipated for completion by the end of 2024.

4. Biodiversity in Norwich

- 4.1** The Norwich Biodiversity Baseline Study 2024 conducted an analysis of existing species and habitat information to baseline Norwich's natural assets. Despite it being an urban environment, there are many recorded species of flora and fauna, and a good number of designated natural sites in the city.
- 4.2** 631 of the species ever recorded in Norwich are classified as species of conservation concern, which means that they are rare, threatened or protected by law. 172 of these are classed as priority species which are those of international importance or at high risk of rapid decline. 15 European protected species have also been recorded in Norwich, including great crested newt, otter and 11 species of bat.
- 4.3** 54 species of invasive species (non-native) have been recorded in Norwich including Himalayan Balsam, Giant Hogweed and Signal Crayfish. These species can impact negatively on native species by outcompeting for resources and geographic area.
- 4.4** Norwich has a good variety of habitat types. This ranges from marshes, lowland heath, lowland mixed deciduous woodland, grassland and waterbodies. Norwich also contains a variety of priority habitats, which are those identified as the most

threatened and in need of conservation action, including fen and grazing marsh in the river valleys, remnant heathland at Mousehold Heath and the rivers Wensum and Yare. Irreplaceable habitats are those which are very difficult to restore, recreate or replace, or would take a very long time to do so. These types of habitat are afforded special protection in the planning process. There are a small number of irreplaceable habitats in Norwich, including ancient woodland at Lion Wood, veteran trees, and lowland fen along the River Yare.

- 4.5** Norwich also contains many protected sites for both biodiversity and geodiversity. This includes part of the River Wensum SAC reaching into the northwest of the city, five Sites of Special Scientific Interest (SSSI), eight Local Nature Reserves (LNR), and 30 County Wildlife Sites (CWS). Figure 1 displays a summary of the natural assets in Norwich.
- 4.6** The Norwich Biodiversity Baseline Study 2024 has generated a map of “biodiversity hotspots” in Norwich. Figure 2 shows areas of the city that are considered to have the highest biodiversity value in the darker colours. Larger hotspot areas include the northern reaches of the River Wensum, the River Yare Valley and Mousehold Heath, along with some smaller hotspot areas such as around Twenty Acre Wood, Earlham Cemetery and Lion Wood.
- 4.7** The Norwich Biodiversity Baseline Study 2024 spatially represents Norwich using Biodiversity Character Areas (BCAs). The BCAs are based on a shared set of characteristics and themes and give a strategic overview of the natural environment in Norwich. Figure 3 shows the County level BCAs in Norwich, which set out those areas important at a county scale, and figure 4 shows the local level BCAs, setting out biodiversity themes of local importance.
- 4.8** The maps and information contained in Section 4 of this SPD, and within the Norwich Biodiversity Baseline Study 2024 does not take the place of on-the-ground ecological site surveys.

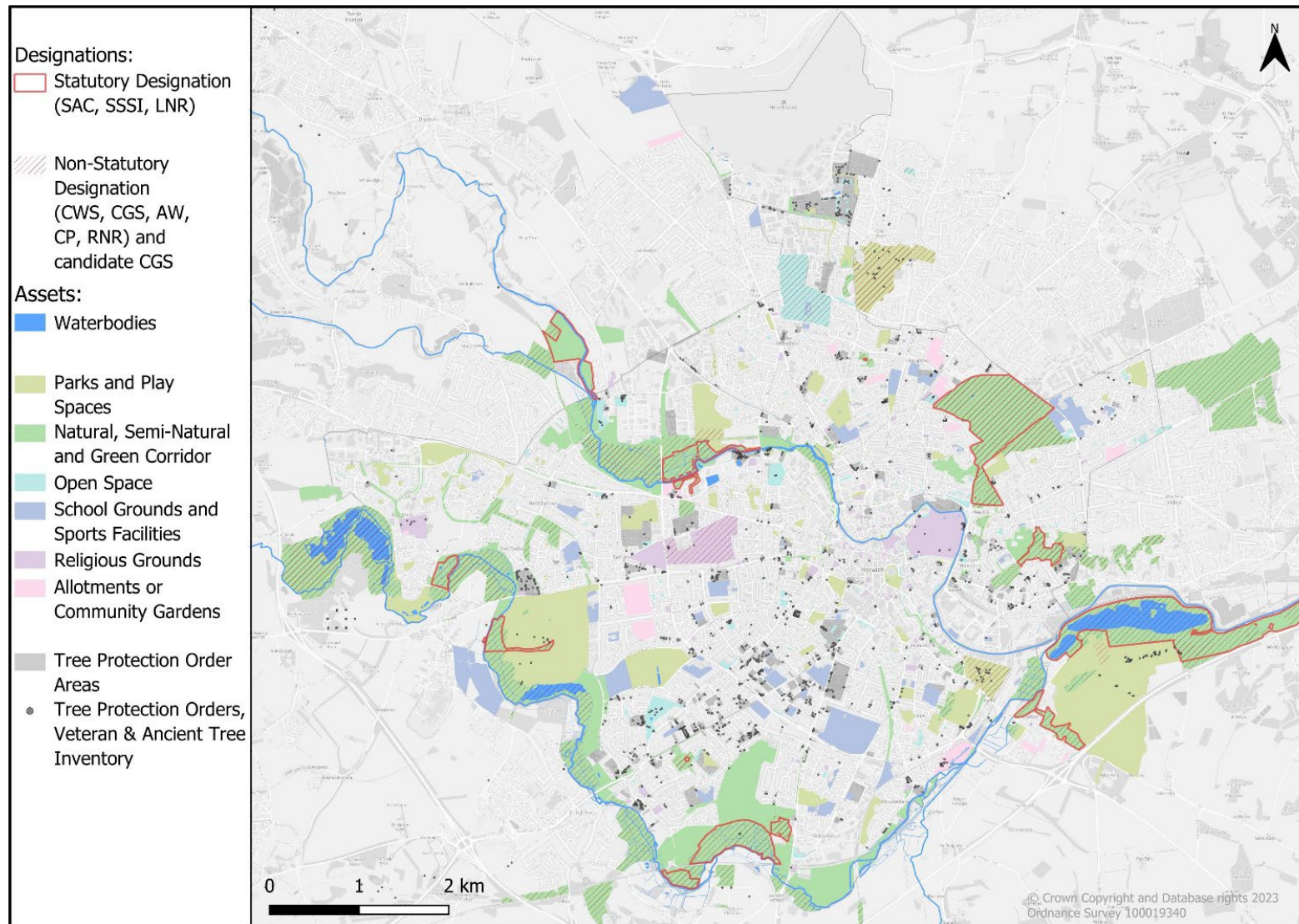


Figure 1: Natural Assets by type and designation in and around Norwich. (Please see Map 12 of the Norwich Biodiversity Baseline Study 2024 for full information).

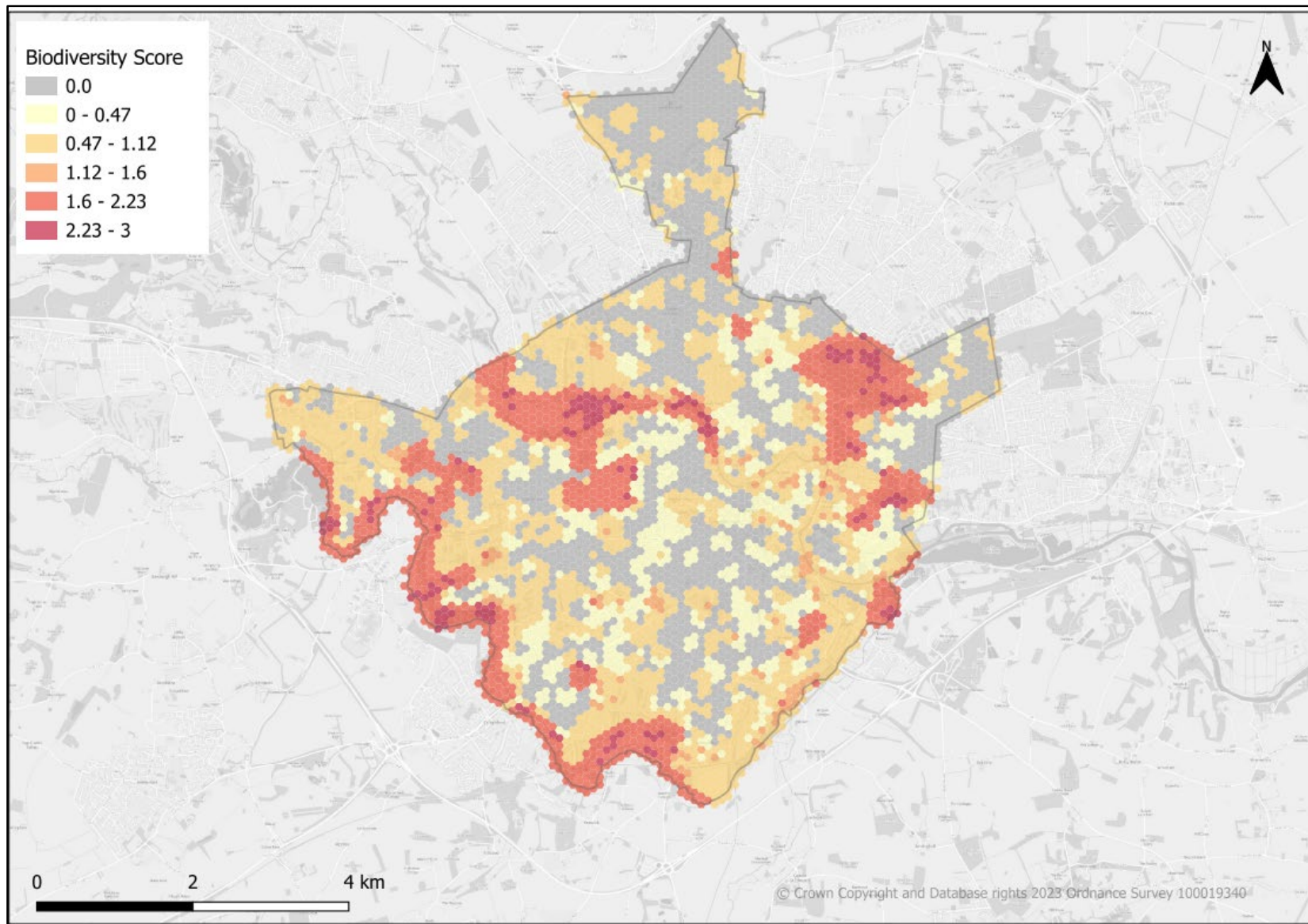


Figure 2: Biodiversity hotspot scores for Norwich. The darker red represents areas with higher scores, or biodiversity hotspots (Please see Map 15 of the Norwich Biodiversity Baseline Study 2024 for full information).

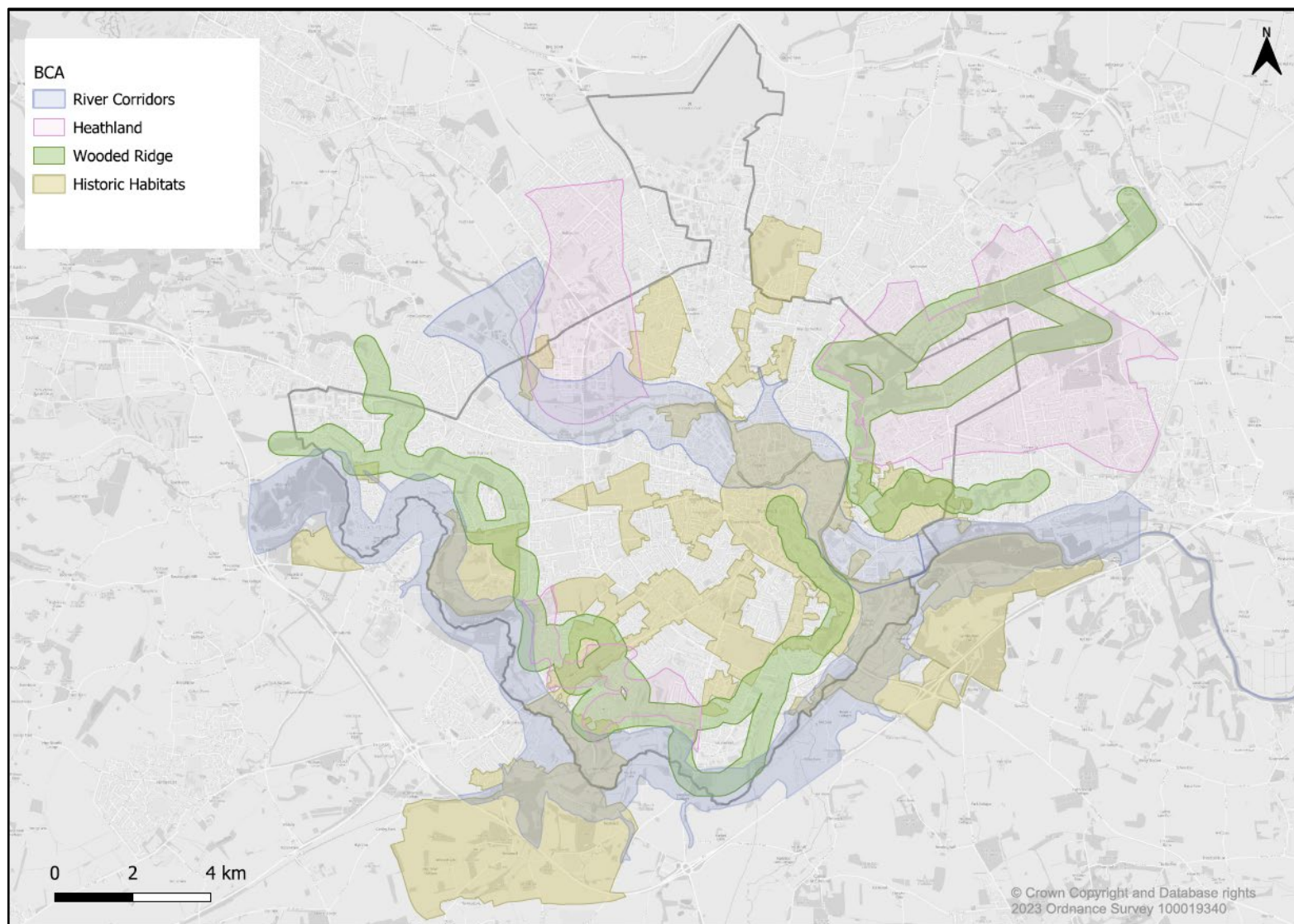


Figure 3: County level Biodiversity Character Areas in Norwich. (See Map 13 of the Norwich Biodiversity Baseline Study 2024 for full information).

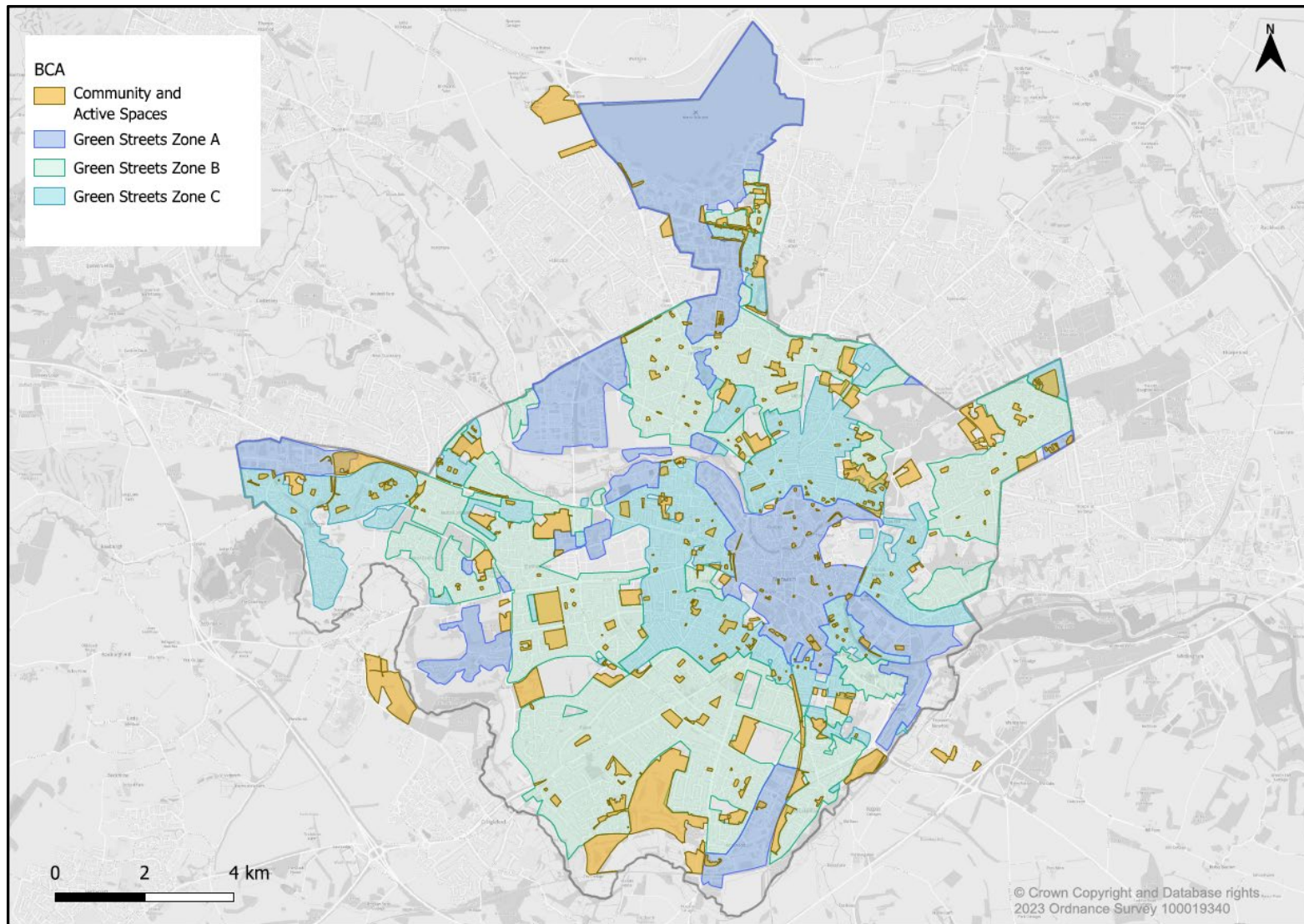


Figure 3: Local level Biodiversity Character Areas in Norwich. (See Map 14 of the Norwich Biodiversity Baseline Study 2024 for full information).

5. How much BNG is required and when?

- 5.1** Schedule 14 Part 1 of The Environment Act 2021 specifies that all grants of planning permission (apart from [exempt development](#)) in England will need to ensure the “biodiversity value attributable to the development exceeds the pre-development biodiversity value of onsite habitat by at least the relevant percentage”.

This means that relevant development must achieve at least 10% biodiversity net gain compared with the pre-development biodiversity value of the site.

- 5.2** Schedule 14 Part 2 of The Environment Act sets out that BNG will be secured on planning permissions by the imposition of a general planning condition. Therefore, all planning permissions subject to BNG will have a condition attached that specifies that:

Development may not be begun unless:

- (a) A biodiversity gain plan has been submitted to the planning authority;
and
(b) The planning authority has approved the plan.***

- 5.3** BNG applies to all major development (except exempt development) planning applications made on or after **12th February 2024**. BNG applies to all other minor development planning applications (except exempt development made on or after **2nd April 2024**).

- 5.4** Reference to ‘made’ applications in paragraph 5.3 refers to valid applications. This means that if an application is submitted prior to these dates, but does not include all required information and is therefore not considered valid until on or after these dates, then the BNG requirement will apply (unless the development/application type is exempt).

- 5.5** [The BNG Exemption Regulations](#) set out the types of development that are exempt from BNG. In addition, some development does not require planning permission. The above requirements will not apply to those development types.

6. How does BNG fit with other planning obligations?

- 6.1** New development in Norwich must consider a number of different obligations as part of the planning process. Of particular relevance to BNG are:

[Nutrient Neutrality](#) – planning permission cannot be granted for new overnight accommodation unless the local planning authority concludes that the development (through a Habitat Regulations Assessment) will not have an adverse effect on the relevant protected sites. Applicants will be required to calculate the nutrient pollution arising from their proposed development and propose suitable mitigation.

GI RAMS (Green Infrastructure and Recreational Avoidance and Mitigation Strategy) – new development is required to ensure that appropriate green infrastructure is provided, and that new development does not adversely impact upon Special Areas of Conservation (SACs) through increased visits to those sites. Compensatory measures have been identified in the GI RAMS towards mitigation measures which is formed of two parts 1) the payment of a tariff contribution towards the cost of mitigation measures at the protected sites, and 2) the provision or enhancement of adequate green infrastructure either on the development site or nearby to provide for informal recreational needs of residents.

- 6.2** These are their own separate requirements which apply to the planning application process, in addition to (and not instead of) BNG. However the government has produced [guidance](#) outlining that BNG provision can be combined with other environmental schemes and nature markets.

7. The BNG Process

- 7.1** Figure 5 provides a summary of BNG stages throughout the planning process. Full information on BNG in the planning process can be found in government regulations and guidance.

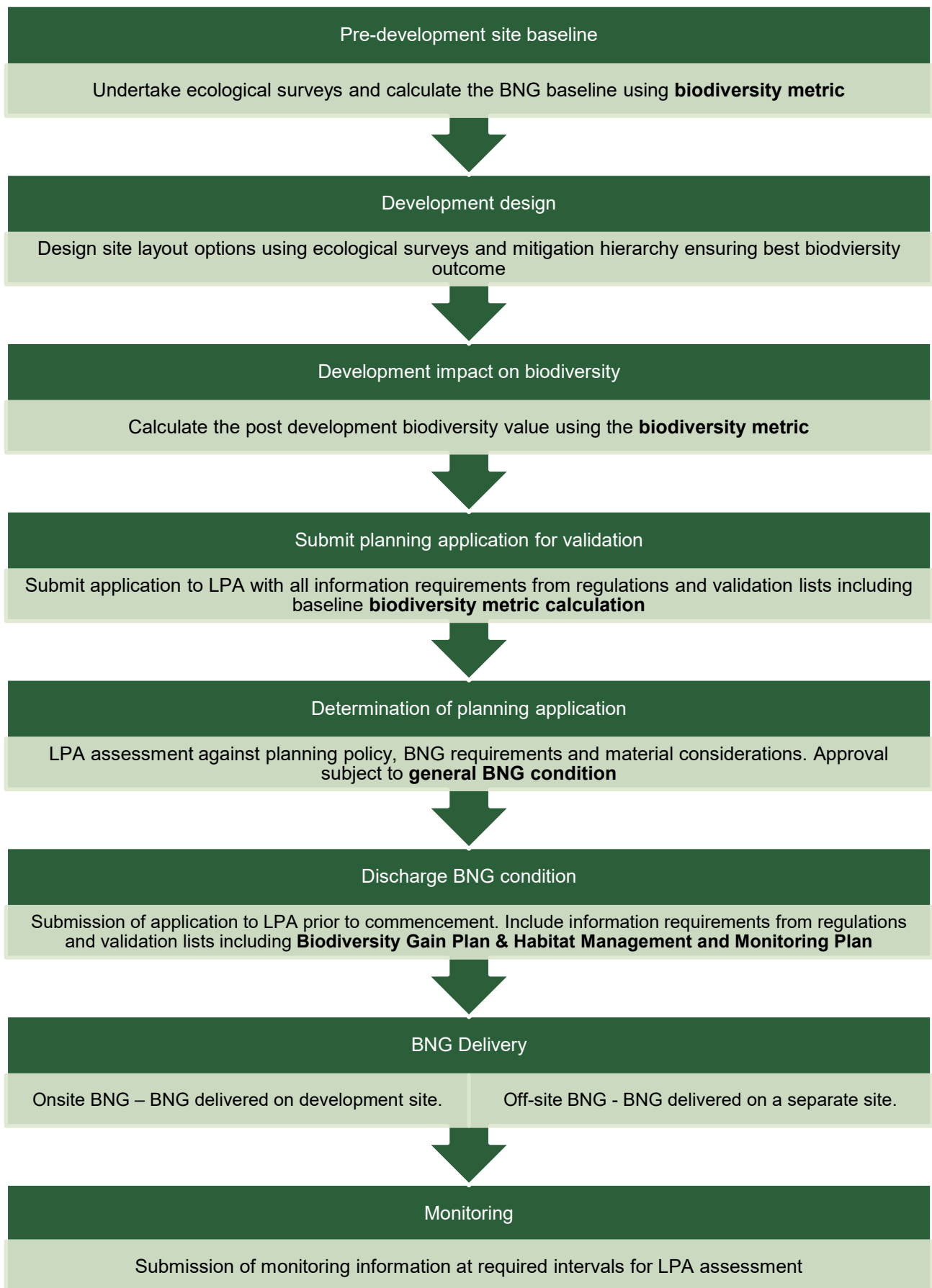


Figure 4: Summary of BNG in the planning process

8. General Principles for BNG

8.1 This section outlines some key principles for BNG in the planning process.

BNG Principles

8.2 It is strongly encouraged that new development follow the '[BNG 10 Good Practice Principles for Development](#)' in the site selection and design of BNG and be carried out in accordance with the relevant and most up to date standards and best practice, including [British Standard BS 8683:2021](#) Process for designing and implementing biodiversity net gain. Survey work to support BNG needs to consider the relevant survey seasons for different species and habitats.

Biodiversity Gain Hierarchy

8.3 The Biodiversity Gain Hierarchy sets out the order of preference of how BNG should be delivered. The hierarchy emphasises that onsite gains should be considered first, followed by registered off-site gains, and statutory biodiversity credits as a last resort. Applicants are encouraged to follow the hierarchy at the earliest stage possible, including site selection and scheme design. The LPA must take into account the Biodiversity Gain Hierarchy when considering whether the BNG objective has been met and therefore whether to discharge the general biodiversity condition.

8.4 The biodiversity gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 186 of the NPPF. The NPPF mitigation hierarchy requires that harm to biodiversity resulting from development should first be avoided, then adequately mitigated, and as a last resort compensated for. Both hierarchies must be considered as part of the LPA's decision-making process.

8.5 In cases where BNG is not required (for example exempt development, or scenarios where the baseline value of the site is zero), biodiversity enhancement may still be required as part of the proposal. This is because existing planning policy requires that development should avoid harm to, protect and enhance the natural environment of Norwich, and there may be species or habitats on site that are already afforded protections through other designations.

Using the Biodiversity Metric

8.6 Biodiversity is calculated using the [Statutory Biodiversity Metric](#). The metric is a spreadsheet-based tool and calculates the value of habitats as 'biodiversity units'. There are three types of unit that are measured in the metric:

- Area habitat units
- Hedgerow units including lines of trees, and
- Watercourse units

8.7 The Biodiversity Metric should be used in line with the relevant rules, guidance and user guide. A [small sites metric](#) has also been produced for use on smaller development sites. This metric should only be used for developments that are

defined as small sites within the relevant user guide. Both metrics should be completed by a competent person, and using a suitably qualified ecologist is strongly encouraged. You must be a qualified assessor to undertake a river condition assessment.

Site Degradation

- 8.8** Applicants should be aware of the rules and regulations of site clearance, destruction, or degradation without relevant permissions prior to calculating the biodiversity baseline for a development site, set out in [The Environment Act 2021](#) (Schedule 14). The regulations set out that if this occurs then the pre-development biodiversity value of the onsite habitat is to be taken to be the biodiversity value immediately before these activities were carried out. This is to prevent degradation of a site prior to calculating the baseline to purposefully achieve a lower starting biodiversity value.

Assigning Strategic Significance for BNG

- 8.9** The Biodiversity Metric allows uplifts to calculated biodiversity units if habitats and their locations are deemed to be strategically significant. This applies to both the baseline metric calculation and the post-development calculation. Identifying when habitats and locations are strategically significant is important as it ensures that the loss of those habitats is appropriately compensated for, but also recognises the value of any newly created strategically significant habitats.
- 8.10** The [Statutory Biodiversity Metric User Guide](#) outlines that strategic significance should be determined by identifying the relevant locations formally in a locally strategy, or a LNRS if one exists. The LNRS for Norfolk and Suffolk has not yet been prepared. Therefore:

The Norwich Biodiversity Baseline Study 2024 is considered to be the relevant local strategy for the purposes of assigning strategic significance uplift unless this is superseded by more up to date evidence.

- 8.11** The Norwich Biodiversity Baseline Study 2024 has developed a methodology for assigning strategic significance uplift based on:
- Whether the site is in a county level Biodiversity Character Area (BCA)
 - Whether the habitat is a priority habitat in that BCA
 - Whether the habitat is located in an ecologically desirable location
- 8.12** When assigning strategic significance to habitat units in the biodiversity metric, applicants should use the resources from the Norwich Biodiversity Baseline Study 2024 (Appendix 1).

Engaging with Norwich City Council

- 8.13** It is strongly encouraged that developers and landowners looking to develop a site engage in [Norwich City Council's pre-application process](#) prior to the submission of a planning application. This could save applicants time and money, and may improve chances of development proposals being approved. This process may also be able to highlight particular biodiversity issues for consideration in a future planning application and help you to identify the most appropriate habitat types and sizes for your site.

9. What is Required to Support a Planning Application?

- 9.1** It is important that all the required information for a planning application is submitted upfront so that an application can be validated in good time. Failure to provide the required information will result in delays to processing applications.
- 9.2** National and local validation checklists can be updated at any time and therefore checking these lists directly prior to submitting your application is strongly encouraged.
- 9.3** For BNG, [the regulations](#) set out that the following information is required to be submitted for a planning application:
- A statement setting out whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition. There is a space for this on the application form;
 - If the applicant believes the planning permission would not be subject to the biodiversity gain condition, a statement setting out the reason why. There is space for this on the application form.

If the planning permission, if granted, would be subject to the biodiversity gain condition the following additional information is required:

- The completed statutory biodiversity metric tool showing the calculation of the onsite biodiversity value on the date of the application or an earlier date proposed by the applicant (which must be justified and agreed with the local planning authority)¹;
 - The publication date of the statutory biodiversity metric tool used to calculate the biodiversity value;
 - A description of any irreplaceable habitat that is on the application site;
 - A plan showing the location of the habitat used in the biodiversity metric calculations and any irreplaceable habitat.
- 9.4** Although not currently required to be submitted as part of a planning application by national regulations, Norwich City Council requires the submission of the following documents along with a planning application in accordance with the

¹ This date of the baseline calculation may also be immediately prior to any site degradation carried out without relevant permission. See paragraph 8.8. If any site degradation has been carried out without the relevant permission the application should also include a statement that such activities have occurred, confirmation of the date immediately before those activities were carried out and any available supporting evidence for the biodiversity value of the site on that date.

local validation list. This enables the council to review more detailed information earlier in the process, have greater confidence in the BNG measures being proposed:

- A statement providing information about the person completing the BNG metric calculation and why they are a competent person to do so.

9.5 For an application to discharge the BNG pre-commencement condition, [the regulations](#) set out that the following information is required:

- A Biodiversity Gain Plan (BGP) which should include:
 - Information about the steps taken to minimize the impact of development on onsite and any other habitat;
 - On-site pre-development biodiversity value;
 - On-site post development biodiversity value;
 - Any registered off-site gains already allocated or proposed to be allocated the development before the submission of the BGP and their biodiversity value;
 - Any statutory biodiversity credits already purchased or proposed to be purchased for the development.

It is advised to use the [biodiversity gain plan template](#).

10. On-site delivery of BNG

10.1 Delivering on-site BNG means providing habitat on the same site as the development (within the same red line boundary). Aside from avoiding adverse impacts on habitats, the biodiversity gain hierarchy requires that on-site provision of mitigation measures be considered first.

10.2 [Guidance](#) is available as to what might be considered “significant” on-site BNG. What counts as ‘significant’ BNG will vary between applications and will be determined on a case-by-case basis.

10.3 All significant on-site BNG must be secured with a legal agreement for 30 years to ensure maintenance of the enhancements. This may be via a planning condition, Section 106 obligation or conservation covenant. It is advised to use the [Natural England Habitat Management and Monitoring \(HMMP\) template](#) and associated guidance as well as other best practice guidance such as BS 8683:2021 to detail how management and monitoring will be undertaken and to submit this alongside the BGP. These documents can then be agreed as part of a legal agreement.

10.4 ‘Non-significant’ on-site BNG are enhancements that are still included in the biodiversity metric calculation but will not make a significant different to the development’s biodiversity value. Guidance is available as to what might be considered non-significant on-site BNG, however what counts as non-significant BNG will vary between applications and will be determined on a case-by-case basis.

- 10.5** Non-significant BNG does not need to be secured by a legal agreement for 30 years.

11. Off-site delivery of BNG

- 11.1** Off-site delivery of BNG is where biodiversity enhancements are provided in a location other than the development site (outside the red line boundary). There are several options for delivering off-site BNG:

- Delivering [registered off-site BNG](#);
- [Purchasing statutory biodiversity credits](#).

- 11.2** All off-site BNG must be secured with a legal agreement for 30 years to ensure maintenance of the enhancements. This may be via a planning condition, Section 106 obligation or conservation covenant. It is advised to use the Natural England HMMP template and associated guidance, as well as other best practice guidance such as sBS 8683:2021 to detail how management and monitoring will be undertaken and to submit this alongside the BGP. These documents can then be agreed as part of a legal agreement.

12. BNG Monitoring and Post-construction

- 12.1** Monitoring of BNG enhancements will be undertaken in accordance with the details approved in the BGP and HMMP. Monitoring and management of BNG enhancements will be the developer or landowners' responsibility.
- 12.2** Norwich City Council reserves the right to charge a fee for BNG monitoring as part of a legal agreement to ensure BNG mitigation and enhancement is being provided in accordance with the agreed BGP/HMMP.
- 12.3** Local Planning Authorities have a responsibility to report information on BNG secured via development. This information will be reported in accordance with [guidance on public authorities complying with the Biodiversity Duty](#).

13. Glossary

Biodiversity

The variety of all life on Earth; genus, species and ecosystems. It includes all species of animals and plants, and the natural systems that support them. The word biodiversity comes from the term “biological diversity”.

Biodiversity Net Gain

An approach to development/land management that aims to leave the natural environment in a measurably better state than it was beforehand.

County Wildlife Site

A conservation designation for areas rich in wildlife but are outside of nationally protected natural area designation.

Ecosystem

An ecosystem is all the plants and animals that live in a particular area together with the complex relationship that exist between them and their environment.

European Protected species

A group of species protected by law through the European Habitats Directive.

GI RAMS

Green Infrastructure and Recreational Avoidance and Mitigation Strategy. This sets out the requirements for planning applications to ensure that new development can provide appropriate local green infrastructure for residents and to manage and reduce the impact of visits to protected areas.

Green Infrastructure

A network of multi-functional green and blue spaces which deliver benefits to both the environment and the local community. GI includes natural green spaces, man-made managed green spaces, allotments, urban parks, designated historic landscapes. Footpaths, cycleways, green corridors, waterways, wetlands, ponds and floodplains.

Habitat

The natural home or environment of an animal, plant or other organism.

Invasive Non-Native Species (INNS)

Species that occur outside their normal geographic range due to direct or indirect introduction.

Irreplaceable Habitats

Habitats which would be technically very difficult (or would take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. Ancient Woodland, unimproved grassland, and ancient hedgerows are also examples of irreplaceable habitat.

Local Nature Reserve (LNR)

A protected area of land because of its special natural interest.

Native Species

Species that are rare, threatened and protected by law that are in need of nation-wide conservation as identified by the [UK Biodiversity Action Plan](#).

Nutrient Neutrality

A means of ensuring that a plan or development does not add to the existing nutrient burdens within watercourse catchments i.e. ensuring there is no net increase in nutrients as a result of the above.

Priority Species

Species identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan (UK BAP).

Priority Habitats

Habitats identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan (UK BAP).

Special Area of Conservation (SAC)

These are sites that have been adopted by the European Commission and formally designated by the government as areas of importance to protect important species and habitats.

Species

A classification of related organisms that share common features and characteristics.

Species of conservation concern

Species that are rare, threatened and protected by law that are in need of nation-wide conservation as identified by the UK Biodiversity Action Plan.

Site of Special Scientific Interest (SSSI)

A formal designation protecting an area that is of special interest due to wildlife and geological features under the Wildlife and Countryside Act 1981.

Strategic Significance

A multiplier contained within the biodiversity metric that applies an uplift to biodiversity units. Strategic significance is determined locally through local plans and strategies, and eventually LNRS.

Appendix 1 – Strategic Significance Resources

The following resources have been extracted from the Norwich Biodiversity Baseline Study 2024. For full information please see the baseline report.

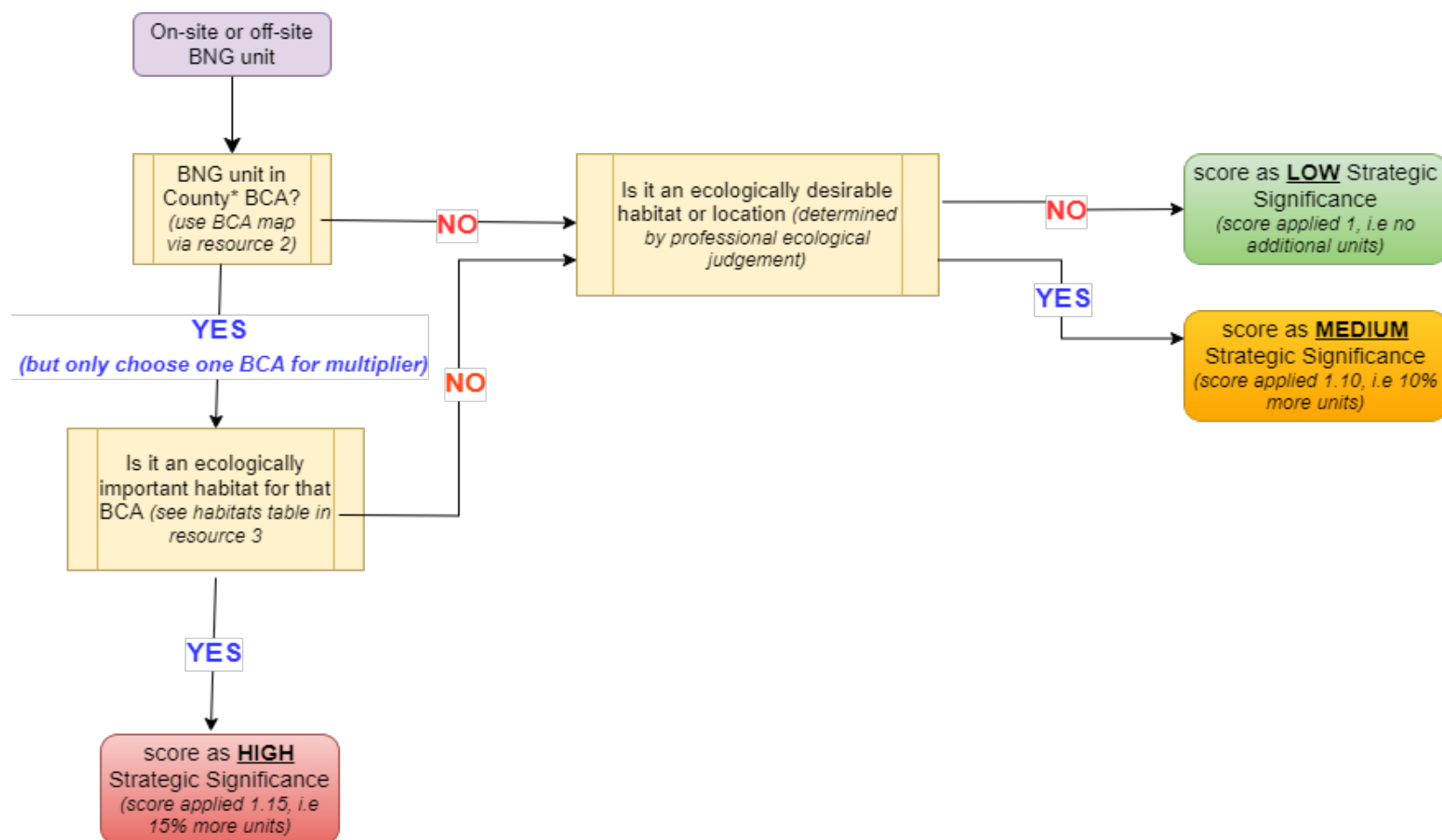
Resource 1 - a decision tree to help determine whether units are given high, medium or low strategic significance uplift. This resource includes four worked scenarios.

Resource 2 - provides signposting to each County Biodiversity Character Area (BCA) boundary map within Norwich. (Norwich BBS Appendix BBS6 – Layered PDFs and Figure 3 of this report).

Resource 3 -provides a list of habitats that are eligible for uplift.

These resources are designed to be used in conjunction with each other, to collectively provide the information needed for decision making.

Resource 1: Decision Tree for Assigning Strategic Significance



Resource 1: Decision tree for deciding how to assess units for potential Strategic Significance uplift. BNG units refer to biodiversity units that are on-site or off-site and pre and post development. Note: uplifts are applied automatically in the metric once strategic significance has been entered.

* Based on expert ecological opinion (authors of *The Norwich Biodiversity Baseline Study 2024*) Local BCAs are not considered applicable for uplift due to their wide geographic coverage and numerous, isolated sites.

Example scenarios:

Using the above decision tree (Resource 1) and the County BCA Map (Resource 2) and Habitats table (Resource 3), four scenarios are worked through below, to show how the resources should be used together and how the decision tree can be used to decide on uplift scoring. The example scenarios are intended to be illustrative rather than comprehensive or site specific.

Scenario 1: Planting of what will become Lowland Mixed Deciduous Woodland within the Wooded Ridge County BCA.

Decision tree: Is the habitat in County BCA? Yes. Is the habitat ecologically important and identified for the BCA in Table 1? Yes.

Result: Assign **high** strategic significance score.

Scenario 2: Planting of what will become Lowland Mixed Deciduous Woodland within the Green Streets Local BCA. The woodland will fill in a gap as part of a woodland stepping-stone corridor.

Decision tree: Is the habitat in County BCA? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? Yes.

Result: Assign **medium** strategic significance score.

Scenario 3: Creation of what will become Lowland Meadow grassland within the Heathland County BCA. The meadow will connect up with other meadows sites in proximity.

Decision tree: Is the habitat in County BCA? Yes. Is the habitat ecologically important and identified for the BCA in Table 1? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? Yes

Result: Assign **medium** strategic significance score.

Scenario 4: Planting of what will become Lowland Mixed Deciduous Woodland within the Green Streets Local BCA. The woodland will be isolated from other woodland habitat.

Decision tree: Is the habitat in County BCA? No. Is it an ecologically desirable habitat or location (determined by professional ecological judgement)? No.

Result: Assign **low** strategic significance score.

Resource 2: Sign posting to County BCA Boundary Maps

To identify the boundaries of each of the four County BCAs (River Corridors BCA, Wooded Ridge BCA, Heathland BCA and Historic Habitats BCA) where sites are eligible for uplift, boundary maps showing the spatial extent of each area are provided as layered PDFs in the BBS Appendix BBS6.

Resource 3: Table of habitats and habitat features eligible for uplift

Resource 3 is a table of habitats and habitat features eligible for uplift, to be used in conjunction with both the decision tree (Resource 1) and County BCA boundary maps (Resource 2).

This table provides a list of habitats and habitat features that are ecologically important in each BCA and informs whether a strategic significance uplift can be applied. If sufficient ecological evidence is provided, other habitats or habitat feature not listed in the table may be eligible in the relevant BCA and therefore could also be eligible for uplift.

Resource 3 can also be used for the identification of Medium Strategic Significance uplift, as can the Biodiversity Hotspots Map in the BBS Appendix BBS6 but professional ecological judgement is needed to apply these as sources of evidence. All habitats and habitat features listed are appropriate for creation or restoration to implement net gain actions, unless specifically stated.

Resource 3: Table of habitats and habitat features eligible for uplift

Eligible habitats and habitat features for High Strategic Significance BNG uplift or potentially to be used for Medium Strategic Significance BNG uplift, where professional judgement applied.

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
River Corridors	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate	Only if ecologically appropriate location	Tussocky grass or scrub border (as linear features for birds e.g., barn owl/bats etc)
	Wet Woodland	'Woodland and forest - Wet woodland'		
	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Acceptable only in marginal stands or island refuges.	
	Lowland Calcareous Grassland	'Grassland - Lowland calcareous grassland'	Wet or seasonally wet	

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
BCA	Purple Moor-grass and Rush Pastures within marshes*	'Wetland - Purple moor grass and rush pastures'*		
	Lowland Fens^	'Wetland - Fens (upland and lowland)'^		
	Reedbeds	'Wetland - Reedbeds'		
	Coastal and Floodplain Grazing Marsh	'Grassland - Floodplain wetland mosaic and CFGM'	Appropriate water levels	
	Lowland dry Acid Grassland (including if seasonally wet)	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland' - including if seasonally wet	On edges of wetland habitats as part of an ecotone from neutral to acid	
	Lowland Meadows	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'	Wet or seasonally wet	
	Rivers*	Watercourse categories: 'Priority habitat*', 'Other rivers and streams*', and 'Ditches' if ecologically appropriate		
Heathland	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Lowland dry Acid Grassland	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland'		

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
BCA	Lowland Mixed Deciduous Woodland	'Woodland and forest - Lowland mixed deciduous woodland'; OR 'Woodland and forest - Other woodland; broadleaved' or 'Woodland and forest - Other woodland; mixed' if ecologically appropriate	Only if extending woodland at Mousehold Heath, without reducing area of heathland/acid grassland. No other locations applicable.	
	Lowland Heathland	'Heathland and shrub - Lowland heathland'		
Wooded Ridge	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate		
	Lowland Mixed Deciduous Woodland	Woodland and forest - Lowland mixed deciduous woodland'; OR 'Woodland and forest - Other woodland; broadleaved' or 'Woodland and forest - Other woodland; mixed' if ecologically appropriate.		
	Ancient Woodland^	Ancient Woodland^	Restoration and enhancement only	
	Wet Woodland	'Woodland and forest - Wet woodland'		

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
BCA	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Only if ecologically appropriately located	
	Traditional Orchards	'Grassland - Traditional orchards'		
	Lowland Calcareous Grassland	'Grassland - Lowland calcareous grassland'	As glade meadows only	
	Lowland Meadows	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'	As glade meadows only	
	Lowland dry Acid Grassland	'Grassland - Lowland dry acid grassland' OR 'Grassland - Other lowland acid grassland'	As glade meadows only	
Historic Habitats	Priority Habitat standing water or ponds	'Lakes - Ponds (priority habitat)'		Ghost ponds, i.e., restoration of ponds which contain an old seed bank, and are shown on historic OS mapping, such as 1st editions.
	Native hedgerows	All 'Native Hedgerow' and 'Ecologically valuable line of trees' categories, plus 'Line of trees - associated with bank or ditch' if ecologically appropriate		Tussocky grass or scrub border (as linear features for birds e.g., barn owl/bats etc)

BCA	Habitats and habitat features eligible for uplift		Required attributes ¹	Preferable attributes ²
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Lowland dry Acid Grassland\$	'Grassland - Lowland dry acid grassland'\$ OR 'Grassland - Other lowland acid grassland'\$		
	Wood-pasture and Parkland	'Woodland and forest - Wood-pasture and parkland'	Restoration and enhancement only	Extensive restoration of open grown trees - managed by pollarding and/or significant amounts of dead and decaying timber may be acceptable in combination with other features such as veteran trees
	Ancient and Veteran Trees^	'Individual trees - Urban tree' or 'Individual trees - Rural tree' ONLY if Ancient or Veteran^	Maintenance of good condition through appropriate tree management	
	Dense scrub	'Heathland and shrub - Blackthorn scrub', or 'Heathland and shrub - Bramble scrub', or 'Heathland and shrub - Gorse scrub', or 'Heathland and shrub - Hawthorn scrub', or 'Heathland and shrub - Hazel scrub', or 'Heathland and shrub - Mixed scrub', or 'Heathland and shrub - Willow scrub'	Species-rich/ecologically valuable. Rarely acceptable in this BCA unless in small managed patches connecting woodland or on boundary of the site.	
	Lowland Calcareous Grassland\$	'Grassland - Lowland calcareous grassland'\$		
	Lowland Heathland\$	'Heathland and shrub - Lowland heathland'\$		

BCA	Habitats and habitat features eligible for uplift			
	Priority Habitat category or equivalent	Biodiversity Metric Habitat Name (based on UKHab)		
	Open Mosaic Habitats on Previously Developed Land*	'Urban - Open mosaic habitats on previously developed land'*		
	Lowland Meadows\$	'Grassland - Lowland meadows' OR 'Grassland - Other neutral grassland'\$		
	Traditional Orchards*	'Grassland - Traditional orchards'*	Restoration and enhancement only	
All habitats/habitat features listed are appropriate for creation or restoration to implement net gain actions, unless specifically stated.				
¹ = Required attributes = Listed habitats or habitat features are not acceptable for uplift unless adhering to or containing these required attributes.				
² = Preferable attributes = Listed habitats or habitat features are more likely to be acceptable as uplift with these attributes, but they are not required.				
* = Unlikely but acceptable if other features present. e.g., veteran trees in Historic Wildlife Refuges.				
\$ = Grazed if in parkland or grazed/other appropriate management such as hay cut in other historic settings such as churchyards.				
^ = Irreplaceable Habitat as defined in BNG regulations and NPPF.				
All habitats listed under Historic Wildlife Refuges BCA must be within a historic setting and this may include the restoration of remnant wood-pasture or parkland in designed landscapes/ medieval parks - especially where veteran trees survive.				
If a site where BNG units are being assessed is within more than one BCA, as long as the proposed habitats are important to that BCA, as detailed in this table, any BCA can be used for uplift. Preference should be given to the option that provides the most locally appropriate and beneficial impact for nature recovery. Sites within multiple BCAs will only count once for uplift – no double counting of the multiplier is allowed.				

Executive Summary

Section 1: Introduction

This report has been commissioned by Norwich City Council (Norwich CC) to provide a baseline assessment of biodiversity in the city. Its purpose is to identify the factors threatening it and to present prioritised opportunities for enhancement. The Norwich Biodiversity Baseline Study (BBS) has also provided an evidence base to produce a framework for ongoing biodiversity survey and monitoring and presents information that can be used to inform Biodiversity Net Gain (BNG) guidance and Supplementary Planning Documents (SPD).

Section 2: Results from Data Gathering and Gaps Identification

In this section, gaps in species, sites, and habitat data in Norwich have been identified. While the BBS provides a valid baseline assessment for the city, there is a limited to moderate impact from gaps in data currency and resolution. The Norwich Biodiversity Baseline Study Annex 1 Survey and Monitoring Framework provides methods to address these gaps going forward. Much of the species' data held consists of ad hoc records rather than structured long-term surveillance and monitoring. This has resulted in a disparity in recorder effort across the study area, which in turn can lead to difficulties in calculating species richness, due to differences in how well each area is recorded. Site data, whilst spatially comprehensive, is often outdated. Additionally, whilst two main habitat datasets are available, these suffer from a lack of ground truthing. Mapping indicative of recorder effort across Norwich reveals many areas have no recording, whilst there are medium -high concentrations of records in a small number of locations, associated with areas of semi-natural habitat renowned for their wildlife. This said, these gaps are consistent with most other local authority areas in England and so provide an acceptable level of information to make informed decisions within the rest of the BBS.

Section 3: Natural Assets

Norwich contains a wealth of species (including protected and priority species), statutory and non-statutory designated sites and a variety of different habitats. Three out of five SSSIs in Norwich are in 'favourable' or 'unfavourable recovering' condition. 83% of County Wildlife Sites (CWS) and County Geodiversity Sites (CGS) are in positive conservation management, and 41% of CWS are in 'favourable' or 'recovering' condition. Norwich contains areas of 'irreplaceable habitat' – that is, habitat that if lost can never be replaced with habitat of the same value. These are the areas of Ancient Woodland, Ancient and Veteran Trees, and Lowland Fen.

Section 4: Biodiversity Character Areas (BCAs)

BCAs have been identified to enable a more strategic approach to identifying opportunities, by considering them in context to the wider environment. There are four key BCAs within Norwich that hold strategic importance at a county scale, which can be summarised as follows:

- The **River Corridors BCA** is defined by the wider floodplain/river valley boundaries around the Yare and Wensum, encompassing a diverse range of wetland habitats in addition to the rivers themselves.
- The **Heathland BCA** identifies significant remnants of heathland and acid-grassland across the city, along with wider historic extents.
- The **Wooded Ridge BCA** shows two distinct areas of broadleaved woodland on chalk escarpments which cover large areas of the south and east of the city.
- The **Historic Habitats BCA** underscores the importance of historic parks and churchyards to biodiversity within the city centre, characterised by fragments of ancient meadows or parkland.

There are two additional BCAs identified as locally important that represent thematic areas which are most relevant to an urban environment like Norwich:

- The **Green Streets BCA** divides the residential and commercial gardens and street trees within the city into three characteristic zones (commercial, detached/semi-detached housing, terraced/communal flats), each with differing biodiversity value and opportunities.
- The **Community and Active Spaces BCA** recognises the importance of other amenity sites within Norwich, which may offer both biodiversity value and wellbeing benefits to residents.

In many places the BCAs inevitably overlap, highlighting the competing priorities in many parts of the city, where areas may hold significance for multiple habitats. Defined boundaries can also extend beyond Norwich City, representing broader connectivity with the surrounding districts.

Section 5: Biodiversity Hotspots

Biodiversity hotspots integrate species, sites, and habitat data into a heatmap, revealing areas within Norwich with the highest biodiversity value.

The River Yare Corridor exhibits the highest biodiversity values and highest number of axiophytes, thanks to its considerable extent of priority habitats. The Wensum corridor in contrast has a comparatively lower biodiversity value; although it is rich in axiophyte species in the upper reaches, the urban floodplain within the city centre exhibits lower biodiversity. This highlights the importance of ecological actions in these urban sections of the corridor.

The Wooded Ridge also has a high biodiversity value, as does the Heathland BCA, though this is primarily due to the ecological significance of Mousehold Heath, as the wider historic heathland extent has been found to score relatively lower in many areas.

Regions with greater historical continuity (e.g., parts of the wooded ridge containing Lion Wood, historic parklands and churchyards) displayed higher biodiversity values than even some present-day designated sites, highlighting the ecological value inherent to minimally disturbed legacy ecosystems.

Section 6: Strategic Significance

This section outlines the application of the BCAs devised in this study, to identify areas of strategic significance for uplift under mandatory Biodiversity Net Gain (BNG). It supports the interpretation of BNG guidance and the development of Supplementary Planning Guidance, through the provision of three resources to aid decision making: a decision tree to identify strategic significance scores; definitions of strategic significance levels within the Norwich context; and a table of habitats and habitat features eligible for uplift.

Section 7: Threats

Threats are widespread across all BCAs and decision-making must balance diverse interests, not just biodiversity. There are also data gaps in the evidence base that could limit the proactive decision-making in the development of conservation actions. The overarching impact of climate change also brings intensifying threats by altering habitats, conditions, and ecosystem balances across all BCA types. Each area additionally faces localised threats:

- **River corridors** must contend with risks such as water pollution, water abstraction and agricultural runoff. Siltation and channelisation alter natural waterway habitats and structure while invasive species (e.g. American Signal Crayfish) displace native species.
- **Heathlands** face shrinking habitat areas leading to aggravated ecological isolation and fragmentation. Air pollution from surrounding regions can cause damage to fragile lichen communities whilst light pollution disrupts the natural nocturnal and breeding behaviours in bat species.
- **Wooded habitats** experience loss of habitat features including dead, aged, mature trees that are good nesting sites for a range of species. Management currently focuses on health, safety, and fire risks but is presently under-resourced for ecologically sensitive management. This leads to regeneration and domination of invasive tree species, and larger trees, leading to a single-age structure which is more vulnerable to damage and disease. Management decisions can also lead to a loss of transitional woodland edge habitat and diverse glades which are important for species richness.
- **Historic habitats** are impacted by the effects of modernisation, including changes in management practices shifting from grazing to mowing. The loss of old structures diminishes niches for wildlife, and urbanisation in the surrounding city leads to increased air pollution. Vulnerability to tree diseases and pests and climate change is also heightened given the recovery time for mature trees.
- **Community sites** face conflicting choices between maintaining vegetation for safety versus biodiversity. Anti-social behaviours such as littering, off-trail use, and vandalism also pose direct threats by degrading habitats and disrupting wildlife.
- **Green city streets** contain limited green space as artificial surfaces and private land are prevalent. This can make it difficult to identify areas to enhance connectivity between isolated green spaces.

This report shows there is a strong relationship between threats and how they can be re-framed to provide opportunities for biodiversity enhancement.

Section 8: Opportunities

City-wide opportunities include encouraging actions and behaviour changes that benefit biodiversity through engagement; using planning design principles for biodiversity, and considering actions through BNG, DLL, implementing SuDS and creating B-Lines to support pollinators. The opportunities presented here are for all stakeholders and partners and subject to feasibility assessment and review.

- For the **River Corridors BCA**, specific opportunities lie in fully coordinating management between marshland sites to restore and create wetlands and floodplains along the rivers Wensum and Yare. This includes opening up canopies, maintaining water levels, creating/restoring ditches/ponds/drains, and, where possible, reverting agricultural land to semi-natural wetland habitat.
- The **Wooded Ridge BCA** presents chances to improve habitat quality and address the threats that arise from a lack of diverse age structure and the loss of glades and transitional edge habitats. These can be avoided through management practices that mimic natural processes, such as opening the canopy, coppicing, haloing, and selective thinning of vegetation. Aside from improving woodland, there is scope to expand woodland, and council-owned land in proximity to woodland sites should be investigated for expanding tree canopy cover.
- For the **Heathland BCA**, priority should be to maintain the favourable condition of Mousehold Heath while identifying potential areas to connect/extend heathland long-term via restored or created acid grasslands on suitable acidic soils. There is also a strong possibility that plant species of the past, many of which are rare and protected today, could be restored by re-excavating ghost ponds and exposing the historic seedbank.
- For **Historic Habitats BCA**, the priority is to maintain important historic sites, habitats, and species niches. Grassland should be managed, where possible with a shift to a 'conservation cut' and focus should be protecting mature and veteran trees, and the species that depend on them (e.g., bats). Installing bat-friendly lighting across the city would reduce wildlife disturbances and mortality.
- In both **Historic Habitats and Community and Active Spaces BCAs** there are opportunities to expand these wildlife refuges, looking into the feasibility of allocating 10% of green spaces as biodiversity assets, where appropriate, creating wildlife ponds, tiny forests, pollinator areas, orchards, and community gardens. This includes historic sites such as churchyards and gardens but more specifically the larger parks, golf courses, and school playing fields.
- For the **Green Streets BCA**, opportunities lie in adjusting road verge maintenance regimes to help connectivity. Green and brown roofs on buildings present an opportunity to integrate nature into urban infrastructure, benefiting pollinators and bird life. Engaging residents in wildlife-friendly practices would also be beneficial.

Section 9: Survey and Monitoring Framework

This section describes the rationale behind the creation of a Survey and Monitoring Framework (Norwich Biodiversity Baseline Study Annex 1 Survey and Monitoring Framework), including details of the framework's purpose, structure and intended use. The Framework outlines approaches to address local gaps in biodiversity data, monitor

biodiversity change and measure conservation success through the creation and delivery of a Survey and Monitoring Programme across Norwich. It has been written so that it can be used as a standalone document for relevant practitioners or appraised at the relevant points when reading the BBS, and when putting together feasibility studies or a review of next steps for integrating these outputs into the Biodiversity Strategy and wider policies and plans.

A variety of surveys are suggested, based on the identified needs from gaps analysis, a review of existing survey and monitoring methods, and the survey and monitoring required to support the delivery of opportunities and recommendations outlined in the BBS.

Section 10: Recommendations

This section makes detailed recommendations for Norwich CC, and its relevant partners and associated stakeholders, to take forward regarding opportunities identified.

Recommendations resulting from the BBS are grouped in themes and summarised as:

- **Governance:** Update relevant Norwich CC strategies in their next reviews to align with the actions and priorities outlined in this report. Consider recruiting staff to coordinate the implementation of the report's findings and review data/opportunities during the 5-year reporting periods.
- **Planning:** Conduct training sessions on the outcomes of this study and include biodiversity actions in planning processes that dovetail with the Green Infrastructure Strategy and explore the possibility of a green living roofs strategy. Use the BCA details as evidence for BNG guidance and strategic uplift considerations and look into supporting the development of a Supplementary Planning Document (SPD) for biodiversity.
- **Land Management:** Maximise the use of conservation cut regimes when managing areas, and balance biodiversity and safety needs by opening canopies, managing scrub, etc. Review areas in BCAs such as parks and open spaces for natural assets like tree planting, wildflower meadows and ponds, aiming for 10% of the communal area to be managed for wildlife (where appropriate and possible). Protect priority species and habitats as a minimum requirement, by, for example, creating a bat protection strategy with focus on underground and old building (churches etc) roosts. Focus on opportunities that restore habitats that have been lost and reconnect up ecological networks, particularly along the river corridors, heathland/acid grassland and parklands.
- **Wider Engagement:** Investigate establishing a full engagement programme of key messages and targeted activities. Continue engagement started within the development of the BBS, with a view to fostering community buy-in and a sense of ownership towards the opportunities identified and recommendations made.

Further recommendations related to Survey and Monitoring consist of:

- **Survey & Monitoring:** Conduct feasibility studies on the identified survey and monitoring priorities, assigning goals connected to biodiversity indicators and utilising groups for site input while budgeting for actions.
- **Species:** Target recording improvements for rare species and under-recorded groups across sites with low current effort. Encourage long-term monitoring and

utilise improved indicator lists over time and ensure this data is captured by boosting guidance on data submission to NBIS.

- **Sites & Habitats:** Incorporate forthcoming Ancient Woodland Inventory updates into an updated baseline, extract relevant site details from management plans, use historic habitat mapping datasets, and ground truth new LNRS habitat maps with targeted field surveys to provide more detail.

Recommendations identified for NBIS:

- **NBIS:** Source and collate records not currently in the NBIS database. Coordinate records data flow, and work with species experts where possible.

Section 11: Further Developments of the Study

The section suggests **next steps or further developments** under each stage of the production of this study, including:

- **Baseline data collection and presentation:** Including conducting periodic updates to address data gaps incorporating any new datasets (e.g., NBN Atlas, Ancient Woodland Inventory) and make updates according to changes in legislative definitions and designations.
- **Further analysis and interpretation of data:** Including engaging with the LNRS process where there are opportunities to incorporate more detailed mapping, considering statistical methods to remove the influence of recording effort on species mapping, and considering detailed analysis of other threats to biodiversity such as climate change.
- **Prioritisation scoring of opportunities:** Including conducting a periodic review of priorities within the context of Norwich CC's and partners resource availability and priorities.
- **Feasibility assessments and creating an action plan:** Including conducting feasibility studies and cost-benefit analyses to narrow down biodiversity conservation actions based on funding and timescales, and piloting actions before wider rollout. Refining prioritisations could also involve examining relationships between biodiversity value and socioeconomic factors across the city.

Section 12: Conclusions

This study demonstrates that Norwich City has important natural assets, supporting a wide range of species including those identified as priority and protected. The city also supports a number of priority habitats including, heathland, woodland, rivers and ponds and has 44 designated sites with a biodiversity focus.

The priority is that existing natural assets are protected first and foremost, bringing as many into favourable condition by 2030 as possible. In addition to this, focus should also be on expanding and connecting these sites before creating new isolated sites. This essentially follows [Lawton, 2010](#)'s suggestion of how to implement the Lawton Principles via a hierarchy in order of priority: Better; Bigger; More; enhance connectivity; create new corridors.

Through assessing the existing data and information, it has been concluded that there are gaps in the evidence base that impact the baseline. The survey and monitoring report

produced as part of this study includes recommendations on how these gaps can be addressed, and how a programme of survey and monitoring can be established to assess changes in biodiversity and monitor conservation success.

General and specific threats to biodiversity across the city have been identified along with many opportunities to address these threats and to enhance the city's natural assets. This has been done through the development of Biodiversity Character Areas which enable strategic planning and resource allocation and work alongside the prioritised lists of opportunities and threats identified.

This study is a baseline and so does not have an action plan as one of the outputs. As such, delivery requires further decisions to be made by Norwich CC and other stakeholders to review these opportunities, through the appropriate consideration of, for example, feasibility studies, cost-benefit analyses, policy prioritisation and resourcing implications.

Equality Impact Assessment

What is being assessed	Draft Biodiversity Net Gain Supplementary Planning Document	Status	First assessment of new proposal
Officer completing	Charlotte Rivett	Role	Planner (Policy)
Team	Planning Policy	Directorate	Planning and Regulatory Services
Senior leadership team sponsor	Sarah Ashurst	Role	Head of Planning and Regulatory Services

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

The main purposes of the Biodiversity Net Gain (BNG) Supplementary Planning Document (SPD) are:

- To support the implementation of national regulations and policy
- Support local policy in the soon to be adopted Greater Norwich Local Plan (GNLP)
- Build on best practice guidance
- Set out the priorities for biodiversity in Norwich to ensure development is delivering the right enhancements in the right places
- To support applicants in gaining planning permission by setting out the council's expectations.

How does it fit with other services and policies, and how does it support our [corporate objectives](#) and [City Vision](#)?

This report meets the Norwich is a sustainable and healthy city corporate priority.

This report addresses the following priorities within the Corporate Plan: reduce carbon emissions, protect the environment and adapt to climate change; and protect and invest in our parks, green spaces and biodiversity.

This report helps to meet the strategic objectives of the [Biodiversity Strategy 2022-2032](#), and multiple actions from the Biodiversity Development Plan.

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

BNG is now a mandatory requirement under The Environment Act 2021. There is no requirement to produce a BNG SPD, however, the council routinely does this for planning policy matters where additional evidence, information and advice can be useful to both applicants and decision makers in submitting and determining planning applications.

Public consultation on draft SPDs is required as set out in national regulations and the council's Statement of Community Involvement. This EqlA will be revisited as part of planning for the consultation.

Who implements, carries out or delivers the policy, practice, service or function? *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

The planning team at Norwich City Council are responsible for writing the SPD, undertaking public consultation, and reporting recommendations to elected members. Elected members (Cabinet) are responsible for the adoption of the guidance note.

What outcomes do we want to achieve, why and for who?

The SPD is aiming to provide clarity and information on BNG in the planning process for applicants and council planners, so that it is clear what the council's expectations are in relation to achieving biodiversity enhancements from planning applications. The SPD is also aiming to achieve the greatest biodiversity benefits for Norwich by providing information on where biodiversity mitigation and enhancements would be best directed.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? *(customers, employees, groups in the wider community etc)*

The production of the BNG SPD is unlikely to disproportionately affect anyone as it applies across the whole of the Norwich area. In addition, the SPD is not relevant to a specific group of people, but will apply to any relevant planning applications, and there are no limitations on who can submit such applications. As part of the determination of planning applications, the local planning authority is required to have due regard to equality and diversity issues under the Equality Act 2010.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	N/A	No impact identified	N/A	N/A	N/A
Disability	N/A	No impact identified	N/A	N/A	N/A

Equality Impact Assessment

Gender reassignment	N/A	No impact identified	N/A	N/A	N/A
Marriage and civil partnership	N/A	No impact identified	N/A	N/A	N/A
Pregnancy and maternity	N/A	No impact identified	N/A	N/A	N/A
Race/ethnicity	N/A	No impact identified	N/A	N/A	N/A
Religion and belief	N/A	No impact identified	N/A	N/A	N/A
Sex/gender	N/A	No impact identified	N/A	N/A	N/A
Sexual orientation	N/A	No impact identified	N/A	N/A	N/A
Other groups	N/A	No impact identified	N/A	N/A	N/A

What evidence and data has been used for this assessment, including community engagement and consultation? *(include links to data sources, consultations etc)*

The consultation that will be conducted will be inclusive and seek to gauge the view of as broader cross-section of the city as possible. This upcoming consultation will contribute evidence towards future iterations of this document.

How has the equality impact assessment informed or changed the proposal?

At this stage the EqlA has not changed the proposal but has flagged up that this document needs to be revisited as part of planning for the public consultation.

What actions have been identified going forward?

Revisit this EqlA as part of planning for the public consultation to identify any impacts and mitigating actions.

How will the impact of your proposal and actions be measured moving forward?

Through revisiting this EqlA as part of planning for the public consultation.
The impacts of the BNG SPD will also be monitored through:

Equality Impact Assessment

- Local plan monitoring against indicator EPE5 for policy 3 of the GNLP which requires that all relevant applications must achieve 10% BNG.
- Monitoring that the council is required to undertake in regard to the strengthened Biodiversity Duty which requires both qualitative and quantitative information on biodiversity actions, including BNG, that the council has undertaken in the monitoring period.

Officer completing assessment	Charlotte Rivett	Date	14.02.2024
Senior leadership team sponsor	Sarah Ashurst	Date	19/02/2024
Equality lead (strategy team)	Joe Siggins	Date	20/02/2024



Committee name: Sustainable development panel

Committee date: 27/02/2024

Report title: **Norwich City Centre Shopping and Town Centre
Floorspace Monitor & Local and District Centres Monitor**

Portfolio: Councillor Fulton-McAlister, cabinet member for Regulatory
Services

Report from: Head of planning and regulatory services

Wards: All wards

OPEN PUBLIC ITEM

Purpose

To report and discuss the findings of the October 2023 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.

The Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor is the council's monitoring report advising of vacancy rates and changes of shop type across the city. Monitoring ensures that the council can measure the implementation of policies on retail monitoring and consider whether to implement them in a more flexible manner or to take an alternative approach taking into consideration market demands and trends.

Recommendation:

It is recommended that members note the findings of the October 2023 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor and consider what implications the finding have both in terms of informing planning decisions and considering the future direction of our planning policies.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.

- Norwich City Council is in good shape to serve the city.

This report addresses the first four aims.

The report also helps to implement the adopted local plan for the city and supports the delivery of the emerging Greater Norwich local plan's policies.

The report helps to meet the business and the local economy objective of the

Introduction

1. This report presents the findings of the October 2023 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.
2. The Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor is the council's monitoring report advising of vacancy rates and changes of shop type in the city. Regular monitoring ensures that the council can assess the implementation of its retail policies and gauge their effectiveness. Previously the main purpose of the reports has been to measure vacancy rates for retail (formerly Use Class A1) and to provide data on the total amount of retail floorspace within the city centre. However over the past few years it has been identifying both locally and nationally that there is a need for greater flexibility to allow our high streets to evolve in order for them to thrive. This is reflected in recent changes to government policy and within the policy approach set out in the emerging Greater Norwich Local Plan. The scope of the Monitor now also looks at all town centre uses.
3. The Monitor is based on a survey of the city's retail and town centre offer carried out in October 2023. This report updates members from the last retail Monitor which was produced in October 2022. The [October 2022 report](#) showed a significant reduction in shop vacancy rates for shop floorspace and units and it showed that other than within the secondary retail area, the city was moving in a positive direction. With vacancy rates down and footfall up overall it was felt that Norwich had recovered very well from the pandemic and in particular the strength and resilience of Norwich's independent retailers was acknowledged.

Main findings of the 2023 Retail Monitor

4. The Norwich City Centre Shopping and Town Centre Floorspace Monitor and Local and District Centres Monitor (October 2023) is attached as Appendix 1. The main findings of the monitor are set out below.

City Centre

- a. The vacant available retail *floorspace* in the city centre is 15.9% which is quite a significant increase from October 2022's figure of 12.2% but is comparable to March 2022's figure where 15.0% of available floorspace was vacant. Today's vacancy rates are however very high compared to a pre pandemic figure of only 5.5% and is the highest vacancy rate that we have seen in the plan period. Prior to the pandemic the highest figure was 12.4% in 2010 which compares to the lowest figure of 4.2% which was experienced in 2014. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also increased from 14.2% in October 2022 to 16.9% in October 2023. The pre pandemic level was 10.0%.
- b. The percentage of vacant *units* in Norwich's city centre has however continued to decrease year on year from 14.7% in October 2020 to 12.3% in October 2023. Over the past 12 months it has fallen from 12.6% to 12.3%. This fall of 0.3% is better than the decrease in vacancy rates that has taken place nationally. In H1 2022 (first half of 2022) national retail vacancy rates stood at 15.4% whereas in H1 2023 (first half of 2023) they had decreased by only 0.1% to 15.3% (Local Data

Company, September 2023¹). Norwich therefore still compares favourably to the average GB retail vacancy rate although direct comparisons are difficult due to methodological difference between surveys and due to surveys covering different areas.

- c. In terms of all town centre uses, vacant floorspace currently stands at 17.0% (up from 15.4% in October 2022 and 16.2% in July 2021) and vacant units remains unchanged at 13.0% (but down from 15.2% in July 2021). Compared to retail only this is now only 0.1% higher for floorspace (compared to 1.2% higher in 2022) but 0.7% higher for units (compared to 0.4% higher for units in 2022).
- d. Overall the amount of retail floorspace in the city centre continues to decrease although the rate by which it is decreasing has slowed since the previous monitoring period. Between October 2022 and October 2023 it reduced by 1,954 sqm which is a 0.9% decrease. This compares to a reduction of nearly 6,000 sqm between July 2021 and October 2022 (2.9%). The total number of retail units also reduced from 947 in October 2022 to 938 in October 2023 which is a 1% decrease. Between July 2021 and October 2022 the number of retail units decreased by 2.5%.
- e. The loss of retail has largely been due to changes of use to other town centre uses rather than to residential or due to demolition. In particular over the past 12 months the loss can largely be attributed to the change of use of two former shops within the Castle Quarter, one to an NHS wellbeing hub and the other to a virtual reality and gaming centre.
- f. Over the past monitoring period there has been a significant reduction in the amount of floorspace under construction/refurbishment although at nearly 2,000sqm it is still relatively high which indicates that investment is taking place. Currently 11 retail units are under construction/refurbishment which compares to 13 units (4,108 sqm) in October 2022 and 5 units (514sqm in March 2022).
- g. Since the October 2022 survey Norwich has continued to lose national chains from the city centre and the loss of Wilko in particular has had a significant impact upon vacant floorspace. Several new chains however have recently opened. In previous years we have reported how resilient Norwich's independent shops have been, particularly within the secondary retail area and the Magdalen Street Large District centre. Nationally independents have started to struggle (see para 21 of main report) and within Norwich there is some concern that Norwich's independent sector is being impacted by economic factors.

Primary retail area

- h. Within the Primary retail area vacant available floorspace currently stands at 16.8% which is a 4.6% increase on 2022 rates where 12.2% of available floorspace was empty. This is also a significant increase in the percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. Vacancy rates did improve between March 2022 and October 2022 (reduced from 15.0% to 12.2%) which indicated that the primary retail area had started to recover from the pandemic but rates have gone up again which may be a result of the cost of living crisis but for Norwich

¹ Local Data Company, "H1 2023 retail and leisure trends analysis" (September 2023)
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can at least in part be attributed to the recent closure of Wilko (which at 5,600sqm has a very significant impact upon floorspace vacancy rates). The percentage of vacant retail units in the Primary Area has decreased from 12.6% in October 2022 to 11.3% in October 2023.

- i. Most of the primary area retail frontage zones are performing reasonably well in terms of their retail function although there are now two frontage zones where the retail frontage is below the minimum threshold set out in policy (Castle Quarter and Timberhill/Red Lion Street).

Secondary retail area

- j. Retail vacancies remain very high in the secondary retail area and have continued to creep up. In terms of vacant floorspace it now stands at 25.4% and vacant units at 12.1%. This high vacancy rate is primarily due to the closure of Toys R Us in April 2018 and the closure of a further unit in the Cathedral Retail Park in July 2021. If the cathedral retail park is omitted from the secondary retail area altogether vacant floorspace would be 9.7%, vacant available floorspace would be 7.1% and vacant units would be 11.2% which is well below the national average of 15.4% and would be one of the lowest in the city centre. This shows that the secondary retail area (excluding the Cathedral retail park) is still performing well in providing independent retail diversity and by adapting it appears that it has remained relatively resilient.

Large District Centres

- k. In the Large District Centres, vacant floorspace rates have increased from 5.6% to 8.7% but this remains lower than in July 2021 when 9.1% of floorspace was vacant. This is a low figure for a shopping area which does not form a central part of the city's retail offer. The vacancy rate at Riverside has increased from 4.9% to 9.6% for floorspace and from 8.5% to 11.8% for units. Magdalen Street, Anglia Square and St Augustine's Large District Centre has also seen an increase in vacant floorspace from 6.3% in October 2022 to 7.9% in October 2023. The number of vacant units has increased from 12.1% to 13.1%. This is still relatively competitive when compared to the GB national average retail vacancy rate of 15.3%.

Rest of centre

- l. In the rest of the city centre (streets outside the defined areas), vacant available floorspace has increased marginally from 10.0% in October 2022 to 10.2% in October 2023. This is around 5-6% lower than the city centre averages and therefore presents a relatively positive picture. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%. The percentage of vacant retail *units* in the rest of the city centre reduced from 15.8% to 15.6%.

District and Local Centres

- m. Vacancy rates in the ten existing district centres have increased slightly from 5.6% in 2022 to 6.0% in 2023. Vacancy rates in the 28 local centres have also increased from 7.1% to 7.4% over the same period but this is still low compared to vacancy rates in 2021. Vacancy rates vary considerably within each of the district and local centres but overall the centres have a much lower average vacancy than the city centre. This

would suggest that the neighbourhood centres are continuing to be robust and vibrant and to offer an appropriate range of local services and facilities, with food stores being most important to their success. During the pandemic people started to shop locally and this seems to be continuing.

Summaries and conclusions

5. Retail floorspace vacancy rates have increased in all areas of the city centre between October 2022 and October 2023; however, the total number of vacant units has continued to reduce. High vacancy rates (for both floorspace and units) were experienced in July 2021 which was unsurprising given the challenging circumstances faced by retailers and the October 2022 report showed how well Norwich recovered and bounced back from this very difficult period which was very encouraging.
6. Nationally retailers are now experiencing further economic challenges brought about by the cost of living crisis, and Norwich has unfortunately seen a number of closures as a result. Notwithstanding this Norwich has however continued to see investment and whilst some multiples and independent have ceased trading, others have opened within the past couple of years.
7. Norwich's independent retailers have historically been very resilient and this can be shown by the low (albeit increasing) vacancy rates within both the secondary retail area (when excluding the Cathedral Retail Park) and the Magdalen Street, Anglia Square & St Augustine's LDC where vacant floorspace rates are 9.7% and 7.9% respectively. This is lower than the primary shopping area and low when compared to a national average retail vacancy rate of 15.3%. However as reported by the Local Data Company, nationally independents have experienced the worst recorded net change for the sector since records began. Rising energy prices, muted consumer spend, high borrowing costs, staffing challenges, the end of business rates relief schemes, mounting supply costs and making repayments on COVID-19 loans drive nearly 21,000 independents across the country to close their doors for good in H1 2023. It will be interesting to see how this sector performs within Norwich over the coming year.
8. This monitoring report now also looks at all town centre use vacancy rates as well as retail. Nationally leisure vacancy rates are lower than retail and whilst it is difficult to compare due to different methodologies of collecting and analysing data, the overall vacancy rate for the city centre does increase slightly when other town centre uses are taken into account although there are quite significant discrepancies between the primary and secondary retail areas and the large district centre and rest of centre.
9. In terms of the total amount of retail floorspace within the city centre, it is continuing to decrease although the rate at which it is decreasing has slowed. Within this monitoring period 1,943 sqm of retail floorspace was lost which is a 0.9% decrease. This now means that since 2008 Norwich city centre has lost around 9.2% of its retail provision. The retail however is generally not being lost to residential or being demolished; instead the city is experiencing diversification and with the floorspace generally changing to other town centre uses. Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that will hopefully be brought into force in the coming months

through the GNLP it is anticipated that this trend will continue, but we just do not yet know at what rate.

10. Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy's aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability. Furthermore the JCS should hopefully be superseded in the coming months by the GNLP which takes a much more flexible approach. It also conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries and the Avison Young "Greater Norwich Town Centres & Retail Study Update" (December 2020) which sets out that there is an oversupply of comparison goods retail floorspace in Norwich which may mean that some units need to be repurposed to other town centre uses.
11. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and as a result of the pandemic. Whilst it is likely that these challenges will have ongoing impacts for the viability of some retail businesses, the past couple of years has shown how resilient the majority of our businesses are. Vacant floorspace has increased over the past 12 months and whilst some multiples and independents have ceased trading within Norwich, there is clearly investment happening with new chains arriving.
12. It is also encouraging how footfall has returned to pre pandemic levels. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around and enjoy their time within the city.
13. It is important to acknowledge that there are many changes that can now take place within retail centres without the direction of the council which include the change of use to other town centre uses but also the change of use to residential without the need for full planning permission. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified several risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned that extending the use of permitted development rights to change to residential could be hugely detrimental to this. Without being able to consider the impact that the loss of town centres uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses at ground floor level which will result in residential interspersed with town centre uses. This will not only affect the way that our high streets function but it could reduce rather than increase footfall. For this reason the Council has concern that the uncontrolled and piecemeal loss of town centre uses could be a threat to the vitality and vibrancy of our high street and it is going to be very important to continue to monitor change over the coming few years.
14. It is also important to acknowledge that Norwich, as with all cities, faces an extremely uncertain time ahead. Whilst Norwich largely recovered from the impacts of the pandemic, vacant floorspace rates have risen quite significantly over the past 12 months which may be a result of rising costs, inflation and interest rates which will have impacted both retailers and

consumers. The Local Data Company predicts that vacancy rates will rise in the second half of the year however they feel that the worst is over for consumers and with interest rates hopefully settling at the end of the year they feel that vacancy rates may fall slightly and then remain relatively stable until 2025. This seems fairly optimistic and with the challenges ahead, some shops and business will inevitable struggle and look to close stores so it would not be a surprise if vacancy rates do continue to rise over the next year.

15. Notwithstanding the above, given the circumstances Norwich has demonstrated that it remains relatively robust and is a thriving retail centre in the East of England. Whilst retail floorspace has increased over the past 12 months, the number of vacant retail units continues to fall and footfall has returned to pre pandemic levels. To maintain a thriving city centre the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced ahead, including working closely with Norwich BID and other key stakeholders.

Consultation

16. Due to the nature of the report, no public or stakeholder consultation has taken place. The portfolio holder has been briefed on the findings of the report.

Implications

Financial and resources

17. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget. There are no proposals in this report that would reduce or increase resources. Staff time to carry out the monitor is met from existing budgets.

Legal

18. There are no legal implications.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The report is not likely to affect people because of their protected characteristics.

Consideration	Details of any implications and proposed measures to address:
Health, social and economic impact	Whilst the report itself does not have any health, social and economic impacts, the findings of the retail monitor should be used to inform future planning decisions and the future direction of travel in terms of town centre and retailing policies. These could have quite significant social and economic impacts. These impacts will need to be assessed as part of the decision making process or when considering what changes will need to be made to our policies in the future.
Crime and disorder	No likely implications
Children and adults safeguarding	No likely implications
Environmental impact	No likely implications

Risk management

Risk	Consequence	Controls required
No risks have been identified in terms of the publication of this report.	n/a	n/a

Other options considered

19. None. The findings of this report support the flexible approach within the GNLP that will hopefully come forward over the next few months but does indicate that our Development Management policies are too restrictive. The government are due to make changes to the National Planning Policy Framework and are due to introduce National Development Management Policies. Until we understand more about what will be contained within the National Development Management Policies, it would be unwise to undertake a review of our DM policies. Consideration therefore needs to be given to how much weight should be applied to existing Development Management Policies in light of government policy and our emerging GNLP.

Reasons for the decision/recommendation

20. The recommendation is to note the findings and to consider what implications they have both in terms of informing planning decisions and considering the future direction of our planning policies, in particular in terms of the weight that is applied to the existing rather restrictive Development Management policies and the weight that must be applied to the GNLP policy that will hopefully be adopted soon as well as national policy. It is not recommended to make changes to the Development Management policies at this point in time as it is proposed to await the adoption of the GNLP and to see what changes are proposed nationally; however it is useful to begin discussions.

Background papers: None

Appendices: Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor (October 2023)

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Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local & District Centres Monitor



Survey at October 2023

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Introduction

1. Norwich city centre is the pre-eminent regional centre in the East of England, focused on a historic city centre with a wealth of heritage assets and an unrivalled historic and natural environment. It accommodates the majority of jobs, key services and economic, leisure and cultural facilities serving much of Norfolk and north Suffolk. It is within the top 15 retail destinations in the UK. The established approach to planning for Norwich city centre has been cited as an example of best practice by Government¹.
2. In order to get a picture of how our high street has changed over time and to help assess the performance of our planning policies and assist in their implementation, regular retail surveys are carried out of the city centre and Norwich's District and Local Centres. The last monitor was carried out in October 2022. A report was written entitled Norwich City Centre Floorspace Monitor & Local & District Centres² which reported how retail vacancy rates had reduced quite significantly since July 2021 with vacancies falling in all areas of the city centre except the secondary retail area where they had increased very slightly. Vacancy rates had also reduced in the District and Local Centres. This report was very encouraging and showed how well Norwich had bounced back from a very difficult period during the pandemic. In particular it was noted how resilient Norwich's independent retailers were.
3. The past year has brought about fresh challenges in terms of the cost of living crisis, rising interest rates, high energy costs and reduced consumer confidence. This report seeks to understand how Norwich's retail sector has coped with these economic pressures.
4. Since July 2021 the report also now looks at vacancy rates for all town centre uses (such as financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways, offices, medical and health services, sport and leisure uses and betting shops). Prior to this the main purpose of the reports was only to measure vacancy rates for retail (formerly Use Class A1) and to provide data on the total amount of retail floorspace within the city centre. Particularly due to the changes in the Use Classes Order and the General Permitted Development Order a few years ago, it is considered important to include other town centre uses as there is a general acceptance, including in government policy, that high streets do need to evolve in order for them to thrive.
5. With the amount of total retail floorspace reducing year on year we now need to look at what contribution other town centre uses are making to the long-term vitality and viability of Norwich City Centre and it is hoped that this wider scope provides an improved understanding of the 'health' of the city centre overall and the impacts of current relaxations both on the city centre and more widely. Overtime we will be able to start to look at trends for all town centre uses as well as retail which should help assist with policy monitoring and help inform/support initiatives such as a city centre strategy. This will enable us to look at our high street much more holistically.

¹ [Greater Norwich Local Plan, Publication Draft Plan paragraph 309](#)

² [Shopping floorspace monitor October 2022 | Norwich City Council](#)

Policy Context

Existing policy framework

6. The National Planning Policy Framework 2021 (NPPF 2021) states in paragraph 86 that planning policies and decisions should “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. “Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.” The revised NPPF no longer has the requirement for definition of primary and secondary frontages and instead it promotes flexibility and diversification. It recognises the changing face of the high street and the need to take a different approach to retail planning policy in order to reinvigorate and adapt the offering focused in primary centres/core areas to successfully prepare for future; this includes suitable provision of leisure uses and housing within town centres.
7. The Joint Core Strategy (JCS) was adopted in March 2011, with amendments adopted in January 2014 by the three local planning authorities in the Greater Norwich Development Partnership (GNDP).³ The plan covers the period from 2008 to 2026 and will be superseded by the Greater Norwich Local Plan which is due to be adopted in early/mid 2024.
8. Policy 11 of the JCS for Norwich city centre states that its regional centre role will be strengthened and that the retail, cultural and leisure facilities offered in the city will be expanded and enhanced through intensification of retail uses in the primary retail area and its expansion if necessary. The policy also promotes the strengthening of specialist shopping areas in secondary areas of the city centre.
9. Policy 19 of the JCS promotes the strengthening of the Large District Centres (LDCs) at Anglia Square, Magdalen Street & St Augustine’s and at Riverside, which are at the second level of the retail hierarchy headed by the city centre. The essential role of District and Local Centres in meeting everyday shopping needs is also supported.
10. The adopted Development Management Policies Local Plan (the DM plan) provides the detail to enable the strategic policies above to be implemented and to protect the vitality and viability of centres. The existing DM policies seek to retain a certain threshold of retail units within defined centres; however given changes to the Use Classes Order, General Permitted Development Order and the NPPF we acknowledge that a more flexible approach is going to be needed both when implementing the policies and during any future review. Nonetheless it is important to still monitor our existing policies going forward.
11. In particular, policies DM20 and DM21 aim to protect retail function by managing the proportion of shops - as opposed to other services and facilities - in defined city centre shopping frontages (policy DM20) and suburban shopping areas (policy DM21). In both cases local policies seek to ensure that proposals for change of use will not result in the proportion of shops falling

³ The GNDP is made up of Broadland District Council, Norwich City Council and South Norfolk Council, working in partnership with Norfolk County Council and the Broads Authority

below a specified minimum level.

12. For the city centre retail frontages the applicable minimum thresholds for policy DM20 are set out in a separate supplementary planning document (the Main town centre uses and retail frontages SPD, adopted in December 2014). For District and Local Centres the thresholds are set out in policy DM21.

The Use Class Order and permitted development rights

13. Changes to the Use Classes Order which took effect in 2020 and amendments to the General Permitted Development Order which came into force in 2021 have had an impact upon town centres all across the country.
14. Replacing a number of use classes with 'Class E' (Commercial, businesses and services) means that buildings used for any purposes within Class E can now change to any other use within Class E without the need for planning permission. This includes retail, financial and professional, café and restaurants, businesses, clinics, health centres and creches and leisure uses. The government's aim was to simplify the system and to allow greater flexibility to both landlords and tenants to adapt to changing needs and to reflects the diverse range of uses in town centres.
15. The government introduced Class MA which is a permitted development right to allow for the change of use from Class E (commercial, business and service use) to residential (class C3) in order to allow high streets to adapt and thrive; however the Council has concerns that this will mean that the Council has no ability to consider the impact that the loss of town centre uses will have upon the viability and vibrancy of our centres. The piecemeal loss of retail and town centre units could be a huge threat to the vitality and vibrancy of our high streets as once units are lost to residential they are unlikely to ever revert back to a town centre use.

Emerging policy

16. The Greater Norwich Local Plan is due to replace the Joint Core Strategy in early/mid 2024. The policies within the GNLP seek to provide flexibility and recognises the trend for changing uses and functions in city centres. The aim of the plan is to ensure the centre provides an attractive location in which people can experience a complementary range of different uses which support the retail function as well as promoting diversification of services and facilities to ensure that vitality and vibrancy can be maintained throughout the day and evening.
17. Policy 6 places the city centre retail area at the top of the retail hierarchy, with the Large District Centres of Riverside and Anglia Square, Magdalen Street and St. Augustines providing a complementary role and meeting more day-to-day needs. The extent of, and more detailed policies for, the city centre retail area, and the primary and secondary retail areas within it, along with the Large District Centres, will continue to be set out in the existing development management policies.
18. In light of the rapidly changing retail picture, and based on recent trends, no sites have been reserved for retail development and it is anticipated that any additional comparison retail floorspace will primarily be accommodated through the intensification of retail use on existing sites. The policy also prioritises vibrancy, activity and diversity of uses in defined retail areas outside of the

defined primary retail area, permitting the use of redundant floorspace for other uses, including the re-use of upper floors. The policy encourages the development of new leisure and cultural facilities, hotels and other visitor accommodation to support the delivery of a broader range of activities in the city centre and to strengthen Norwich City Centre's role as a visitor and cultural destination.

19. This flexible long-term approach seeks to continue to promote a vibrant city centre in the context of the decline of high street shopping and the growth of online retailing.
20. The Norwich City Centre Future Strategy⁴ prepared by the Norwich Business Improvement District endorses this approach. It acknowledges that a vibrant, diverse and accessible offer providing a range of different experiences for the visitor, alongside promotion of a strong and distinctive sense of place and identity, will be key to the long-term economic success of Norwich city centre.

⁴ [Norwich City Centre Future Strategy, The Retail Group on behalf of Norwich BID, November 2020](#)

National picture

Headline figures	Retail and leisure vacancy rate	Retail only vacancy rates	Leisure only vacancy rates
National figures Green = reduction in vacancy rates between H1 2022 and H1 2023 Red = increase in vacancy rates between H1 2022 and H1 2023	13.9%	15.3%	10.7%

21. The Local Data Company provides regular analysis of town centres across Great Britain and they have recently published the retail and leisure market analysis for the first half of 2023 (H1 2023 retail and leisure trends analysis, published September 2023). One of the most notable findings within the report is that independents have started to struggle, while the chains have held strong by comparison. Notwithstanding this the report notes that Wilko has recently collapsed and the Local Data Company anticipates that big brands are likely to feel the pressure in the second half of 2023 too. The key findings from their most recent publication are as follows:

- (1) Independents performed well in H1 2022; however there has been a net decline in H1 2023 which marks the worst recorded net change for the sector since records began. Rising energy prices, muted consumer spend, high borrowing costs, staffing challenges, the end of business rates relief schemes, mounting supply costs and making repayments on COVID-19 loans drove nearly 21,000 independents to close their doors for good in H1 2023. The net decline of independent retailers was -1,915 units.
- (2) Retail parks continue to do well and recorded a net increase in units in H1 2023.
- (3) The GB vacancy rate (all vacancies) rose from 13.8% at the end of 2022 to 13.9% in H1 2023, representing the first increase in overall vacancy since H2 2020. A 0.2% increase in vacancies in the leisure industry was the main driver of the increase. Retail provided more resilient with the retail vacancy rate seeing no change from H2 2022. The current retail vacancy rate of 15.3% represents a year-on-year decrease of -0.1% thanks to a relative lack of major retail casualties.
- (4) Redevelopment activity continues across the market. The number of demolished properties saw a year-on-year increase of 27%, reflecting efforts to repurpose long-term vacant space.
- (5) In line with the rise in vacancies, net change in units dropped from -923 in H1 2022 to -4,000 in H1 2023. Many of the closures have come from independent retail and leisure businesses, with various government-backed subsidies from the pandemic having been unwound in early 2022. National chains were more resilient as they were able to spread additional costs across their network and utilise other financial levers to support their businesses.

- (6) Retail openings for H1 2023 reached their second-highest recorded level since H1 2014, with 23,504 units opened. Although this represents a decrease on H1 2022, it demonstrates that there are still occupiers who are growing their estates and identifying appealing leasing opportunities in the market.
- (7) There was a net decline in multiples in H1 2023, a loss of -2,085 units, although this represents the best result for the sector since H1 2017.
- (8) Vacancy rates in retail parks is 8.1%. Shopping centre vacancy has continued to fall from its H1 2021 peak of 19.4%, reaching 17.8% in H1 2023. Some of the larger vacant units are being repurposed into leisure uses or for existing tenants looking to upsize. High streets have struggled to reach the same levels of recovery. High street vacancy saw a year-on-year decrease of -0.1%, the smallest improvement of any location type in this period. Vacancy rates in high streets now stands at 13.9%.
- (9) Barbers were the fastest-growing subcategory with health and beauty, cafes and fast food and grocery retail sectors all performing well. Hairdressers was the fastest declining sector with chemists also being hit hard. Pubs have also been affected by rising energy costs and due to tightening consumer spend, fashion shops saw a net decline in units.
- (10) The effects of record-high inflation have been felt by businesses and consumers alike.
- (11) The Local Data Company predicts that vacancy rates will rise in the second half of the year. However they feel that the worst is over for consumers and with interest rates hopefully settling at 5% at the end of the year they feel that vacancy rates may fall slightly and then remain relatively stable until 2025.

Main Findings for Norwich

City Centre Overview

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since Oct 22)
City Centre (Retail only) Green = reduction in vacancy rates between Oct 2022 and Oct 2023 Red = increase in vacancy rates between Oct 2022 and Oct 2023	16.9%	15.9%	12.3%	0.9% decrease

22. The retail monitor survey has traditionally measured vacancy rates in three different ways:

- Retail vacancy rate (Use Class A1) as a proportion of retail floorspace.
- Retail vacancy rate (Use Class A1) as a proportion of retail floorspace, excluding space being built or refitted.
- Retail vacancy rate (Use Class A1) as a proportion of retail units.

23. However due to changes to the Use Classes Order and to government policy and with our emerging policies identifying that there is a need for greater flexibility to allow our high streets to evolve in order for them to thrive, the report also now gives vacancy rates for all town centre uses too. This is measured in two ways, vacancies as a proportion of all floorspace and vacancy rates as a proportion of all units.

24. The vacant available retail *floorspace* in the city centre is 15.9% which is quite a significant increase from October 2022's figure of 12.2% but is comparable to March 2022's figure where 15.0% of available floorspace was vacant. Today's vacancy rates are however very high compared to a pre pandemic figure of only 5.5% and is the highest vacancy rate that we have seen in the plan period. Prior to the pandemic the highest figure was 12.4% in 2010 which compares to the lowest figure of 4.2% which was experienced in 2014.

25. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also increased from 14.2% in October 2022 to 16.9% in October 2023. The pre pandemic level was 10.0%.

26. The percentage of vacant *units* has however continued to decrease year on year from 14.7% in October 2020 to 12.3% in October 2023. Over the past 12 months it has fallen from 12.6% to 12.3%. This fall of 0.3% is better than the decrease in vacancy rates that has taken place nationally. In H1 2022 national retail vacancy rates stood at 15.4% whereas in H1 2023 they had decreased by only

0.1% to 15.3% (Local Data Company, September 2023⁵). Norwich therefore still compares very favourably to the average GB retail vacancy rate. However, direct comparison with national rates is difficult due to methodological differences between surveys and due to the surveys covering different areas i.e. national figures include high streets, shopping centres, retail parks and standalones in local neighbourhood parades.

27. In terms of all town centre uses, vacant floorspace currently stands at 17.0% (up from 15.4% in October 2022 and 16.2% in July 2021) and vacant units remains unchanged at 13.0% (but down from 15.2% in July 2021). Compared to retail only this is now only 0.1% higher for floorspace (compared to 1.2% higher in 2022) but 0.7% higher for units (compared to 0.4% higher for units in 2022). This suggests that by adding leisure uses (including cafes, restaurants, bars and takeaways) as well as financial, professional and other services the percentage of vacant units and floorspace increases. Whilst it is very difficult to compare with national figures due to the difference in surveys and methodology, the national picture is that leisure vacancy rates are lower than retail vacancy rates which does not necessarily seem to be the case in Norwich.
28. Overall the amount of retail floorspace in the city centre continues to decrease although the rate by which it is decreasing has slowed since the previous monitoring period. Between October 2022 and October 2023 it reduced by 1,954 sqm which is a 0.9% decrease. This compares to a reduction of nearly 6,000 sqm between July 2021 and October 2022 (2.9%). The total number of retail units also reduced from 947 in October 2022 to 938 in October 2023 which is a 1% decrease. Between July 2021 and October 2022 the number of retail units decreased by 2.5%.
29. Between October 2022 and October 2023 the loss of retail floorspace can largely be attributed to the change of use of two former shops within Castle Quarter, one to a NHS wellbeing hub and the other to a virtual reality and gaming centre. Other changes across the city centre have also contributed to the loss of retail and these include the change of use of retail units to a takeaway, restaurant, café and events space. Generally over the past few years the loss of retail has largely been due to changes of use to other town centre uses rather than to residential or due to demolition.
30. In terms of refurbishment, there has been a significant reduction in under construction/refurbishment floorspace since the last monitoring report although at 1,991 sqm it is still relatively high which indicates that investment is still taking place within Norwich. Currently 11 retail units are under construction/refurbishment which compares to 13 units (4,108sqm) in 2022 and 5 units (514 sqm) in March 2022. Two schemes that have recently been finished are the conversion of Topshop to Mountain Warehouse and the conversion of a large unit in Castle Quarter to a virtual reality and gaming centre. It should also be noted that House of Fraser closed during the monitoring period but has been refurbished and has reopened as Fraser/Sports Direct. The redevelopment of Tesco at Guildhall to build a hotel above and behind it appears to have stalled due to the delay in being able to discharge conditions as a result of nutrient neutrality. There has also been quite a lot of redevelopment/refurbishment within premises where the last use was not retail which are not picked up within these figures. Yalm, an upmarket food hall, has now opened within the Arcade,

⁵ Local Data Company, "H1 2023 retail and leisure trends analysis" (September 2023)

and there have been a few units at Riverside that have undergone refurbishments such as Mulligans. Five Guys are due to open another restaurant at Riverside soon and a new Turkish Cuisine restaurant is due to open in Tombland. There are also two significant former clubs/pubs which closed but are now being redeveloped for residential/mixed use. These are Mercy on Prince of Wales Road and The Ferry Boat on Kings Street.

31. Recent years have seen an increased diversification of uses within the city centre with a particular increase in the number of cafes and restaurants on offer, along with other 'service' type uses such as tattoo studios and beauty salons. Since 2018 there has also been a continued growth in leisure uses. Many of these leisure uses have been focused within the Castle Quarter with for example the opening of a bowling alley, gaming centres, indoor crazy golf and escape rooms but there have also been several hospitality and leisure uses opening in other places of the city centre such as Chantry Place and the Lanes. It is likely that this trend will continue especially with planning policies being more flexible and with the changes to the Use Classes Order which makes it much easier and quicker for landlords to offer their premises to a wider range of commercial businesses.
32. Change away from retail is clearly a trend that has been experienced nationally over the past few years. The national net loss in comparison retail in H1 2023 was - 2,322 units. Whilst this net decline is at a lower rate than it was in H1 2020 where it reached a low of – 4,975 it is more than it was in H1 2022 where the net loss was – 1,190 units (Local Data Company, 2023). In H1 2022 the Local Data Company reported that there had been a net increase in leisure uses by 643. However in H1 2023, nationally all sectors saw a year on year drop in net change in units with the net decline in leisure being – 446. The Local Data company has set out that this decrease was driven by closures across the bars, pubs and clubs, café and fast food and restaurant categories.
33. Since the October 2022 survey was carried out, some large national chains have been lost from the city centre. These have included Pure Electric, Property Ladder, Montezuma's, Blakely clothing and Wilko. There are also some stores such Argos and Betfred that have rationalised the number of stores that they have but have kept a presence within the city. On a more positive note however there are a number of stores which nationally have rationalised over the past few years but have retained their presence in central Norwich which include New Look, Marks and Spencer and Fraser. This is a positive sign for the health and attractiveness of Norwich City.
34. Furthermore there are a number of national chains that have recently opened in Norwich. This includes Urban Outfitters, Tag Heuer, Breitling, Dune and Moda in Pelle. This is a positive sign and suggests that Norwich is seen as a good place for investment.
35. There has been an 9.2% decrease in retail floorspace since 2008 and 0.9% of this was in the past monitoring period (between October 2022 and October 2023). Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy's aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability and has ultimately prevented a substantial increase in vacancy rates. It also conforms to paragraph 85 of the NPPF which allows for diversification in order

to respond to changes in the retail and leisure industries and is in line with government thinking in terms of creating a single Use Class for most town centre uses and accords with the emerging policy approach set out in the GNLP. It has been shown in the past that an appropriate diversity of other town centre uses such as restaurants, cafes and leisure uses can help support the economic vitality and health of the city centre and as we move forward, this is likely to become ever more important.

36. The importance of creating good quality public space in the city centre to attract visitors and investment and boost active travel is recognised in the Transport for Norwich Strategy (December 2021)⁶ and the City Centre Public Spaces Plan (July 2020)⁷. Since the last retail monitor update in October 2022 four schemes have been completed or are under construction to improve the experience of people walking, wheeling, cycling, sitting outside and socialising in the city centre. A new pedestrian wayfinding system across the city centre has been completed as has the installation of eight book benches. Major improvements to Hay Hill is currently underway and the creation of routes and spaces at the St James Quay development is also currently under construction.
37. Also of particular importance is the progress that has been made on Norwich's Town Deal projects over the past few years. Norwich City Council was awarded £25m of government investment and eight full business cases were developed to deliver skills, enterprise infrastructure and urban regeneration into Norwich which are shown in figure 1.












	 Project	 Summary	 Funding	 Timeline	 Norwich 2040 Vision
Skills and Enterprise Infrastructure	 Digital Hub	A new city centre workspace with start-up & grow on space for digital businesses	£2.5m	Refurbishment from late 2020 to summer 2022 with firms moving in thereafter	A Creative City A Fair City A Dynamic City
	 Norwich Make Space at the Halls	A state-of-the-art digital making space for collaborative creative thinking and high value, cross-sector partnerships between culture, digital & tech	£3.65m	Procurement of new equipment during 2021 and final fit-out by July 2022	A Creative City A Dynamic City
	 Digi-Tech Factory	A new skills facility providing digital tech, engineering and design courses	£1.5m	Construction from August 2020 to autumn 2021 with training commencing in autumn term of 2021	A Creative City A Fair City A Dynamic City
	 Advanced Construction & Engineering Centre	A new technological advanced training facility supporting construction & engineering	£3.1m	Planning to begin in summer 2020 and construction from May to December 2021 to open in January 2022	A Liveable City A Fair City A Dynamic City
Urban Regeneration	 East Norwich Masterplan & Carrow House	A masterplan for a new high-quality urban quarter in East Norwich and repurposing Carrow House for professional services & knowledge industry office space	£5.1m	Completion of masterplan between autumn 2020 & late 2021 and acquisition of site in autumn 2020 and delivery by summer 2021	A Creative City A Fair City A Connected City A Dynamic City
	 Revolving Fund	Unlocked brownfield sites to deliver modern homes and workspaces for the growing economy	£6.1m	Acquisition & development of sites on an ongoing basis. First three revolutions of the fund anticipated within 7 years .	A Connected City A Fair City A Dynamic City
	 Public Realm	Enhanced city centre public & urban spaces and improved connectivity & navigation	£4m	Improvements made between 2021 & 2023	A Liveable City A Fair City A Connected City A Dynamic City
	 Branding	A commercial proposition for Norwich as 'the place' for business and a city to live, learn and invest in	£180k	Project complete by end of 2021	A Dynamic City

Figure 1: Towns Deal projects

38. Over the past year good progress has been made on a number of the projects.

⁶ [Transport for Norwich Strategy - Norfolk County Council](#)

⁷ [Norwich city centre public spaces plan | Norwich City Council](#)

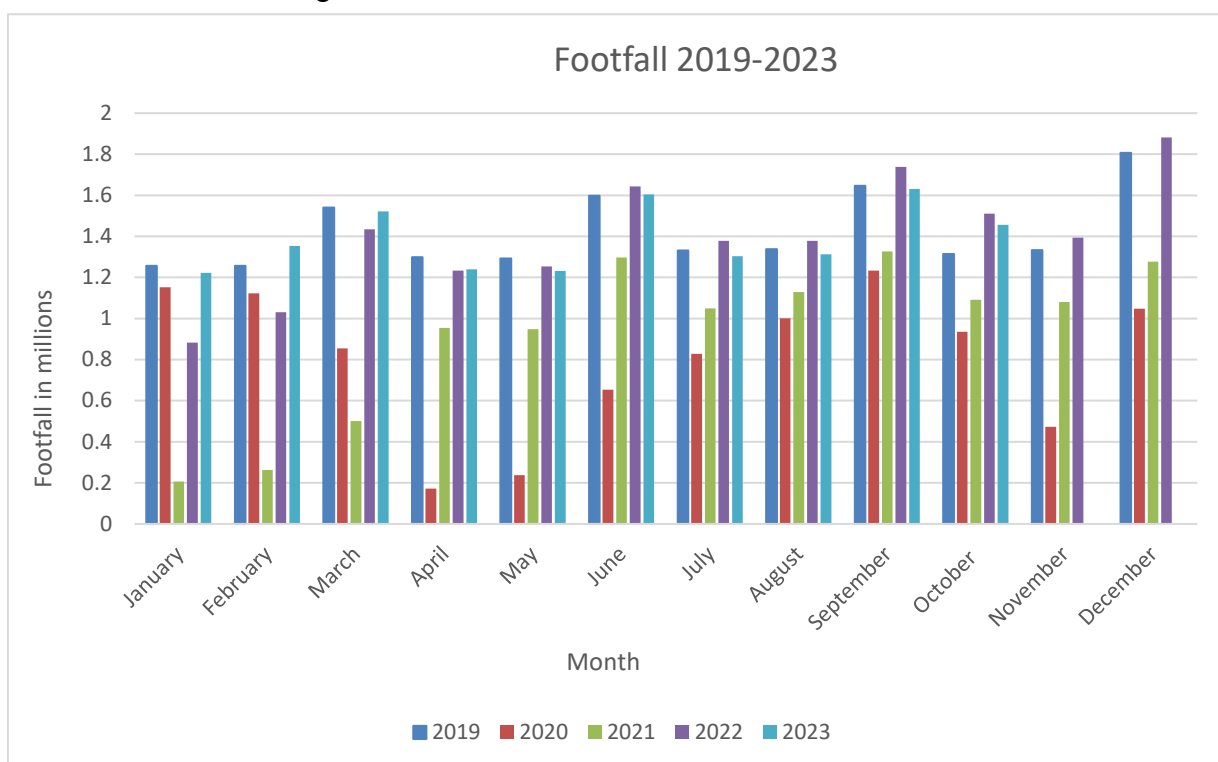
The East Norwich Masterplan was completed in 2022 and a Supplementary Planning Document is now in preparation. Work has started on the public realm improvements at Hay Hill which include planters, more seating, a water feature and increased space for cultural activities. The branding project was completed in October 2022 with the launch of the Work in Norwich (WiN) digital platform which acts as a gateway for new businesses and people to understand what the city offers.

39. Furthermore whilst a number of the other towns deal projects are not directly related to our retail and leisure provision, through supporting the office economy this also supports the balance and symbiosis that exists between the business, retail, hospitality, leisure and cultural sectors in the city centre. This city centre vitality is an essential part of the wider “Norwich offer” to residents, businesses, visitors, workers and students; driving investment and growth to support the city’s future economic wellbeing.
40. In terms of future retail growth, the level of floorspace growth promoted by JCS policy 11 was based on assumptions in a 2007 study and the retail market has changed radically since then. An updated retail study to assess Norwich’s current ‘*retail needs*’ to inform retail policy in the emerging Greater Norwich Local Plan (GNLP) was produced in December 2017 by GVA⁸ and a further update was produced in December 2020 by Avison Young⁹ to take account of the impact of both the UK’s exit from the European Union and the COVID-19 pandemic. The 2017 report advocates continued support and growth of the comparison goods retail offering, commercial, leisure and other ‘main town centre uses’ in Norwich City centre. The report recommends a need for an additional 11,000m² - 15,000m² comparison retail floor space to 2027. Further to the above, the report also supports continued improvement to the public realm in Norwich, following recent success of completed improvements. The report considers this approach appropriate to support and enhance its role as a centre of regional-scale shopping and leisure significance. The 2020 report sets out that there has not been a significant change in the convenience goods floorspace forecasts and it remains the case that there is no quantitative requirement to plan for net additional convenience goods floorspace, although there may be qualitative reasons why a modest amount of convenience goods floorspace should be placed in new local centres to support the day to day needs of new communities.
41. Where there are great differences between the 2017 and 2020 reports is around comparison goods floorspace. The 2020 report now sets out that there has been a material change in the level of retail expenditure available to support ‘bricks and mortar’ comparison goods floorspace and it now shows an oversupply in the Norwich urban area of circa -20,00sq m net. These levels of ‘negative capacity’ or over supply confirm the strategy for retailing in the GNLP which is not to allocate sites/locations for net additional comparison goods floorspace. Instead this would suggest that we should be concentrating on improving the quality of existing retail provision and it may actually be necessary to allow some units to be redeveloped for other uses which are appropriate within town centre environments.

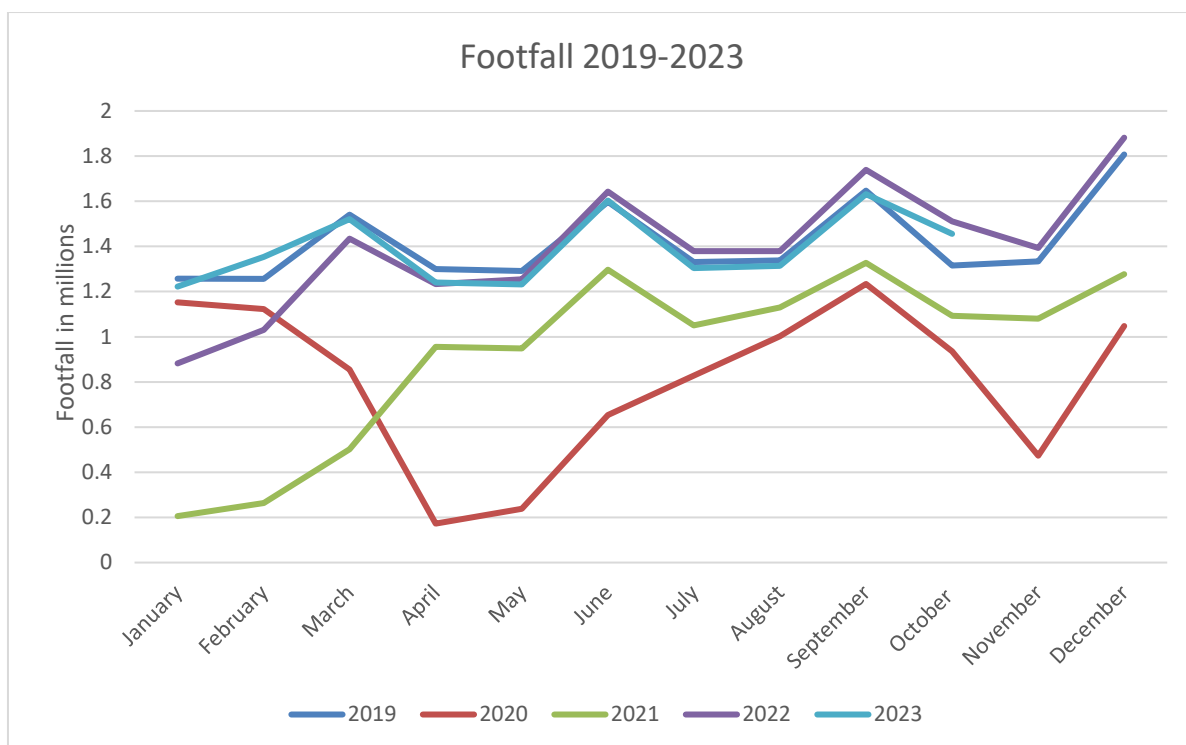
⁸ GVA, “Greater Norwich Employment, Town Centre and Retail Study” (2017)

⁹ Avison Young “Greater Norwich Town Centres & Retail Study Update” (December 2020)

42. Finally it is important to look at the footfall figures from the Norwich Business Improvement District (BID). The BID has supplied data for each month from January 2019 to October 2023 and as shown in the graphs below there have been significant fluctuations over the past few years which is unsurprising given the impact that the pandemic had on footfall within the city centre. However as can be seen from the graphs footfall has returned back to pre pandemic levels and it is really encouraging to see that people have returned and are continuing to shop and spend their leisure time in Norwich. It is however noticeable that at the start of 2023 footfall figures were higher than for the same month the previous year however from May 2023 they are slightly lower than in 2022. This may indicate that people are visiting the city centre less as a result of the current cost of living crisis.



Graph 1: Footfall in Norwich city centre 2019-2023



Graph 2: Footfall in Norwich city centre 2019-2022

43. **Summary:** The results of the survey for the city centre as a whole present a mixed picture. The October 2022 monitored showed how well Norwich had recovered from the pandemic with vacant retail units reducing from 14.1% to 12.6% and this has continued to decrease with vacant units now being at 12.3%. This compares very favourably to the average GB retail vacancy rate of 15.3% (down from 15.4% in 2022) (Local Data Company, September 2023¹⁰). However between October 2022 and October 2023 vacant floorspace has increased quite significantly from 14.2% to 16.9%. This can largely be attributed to the closure of Wilko which at 5,600sqm has a very significant impact upon floorspace vacancy rates and also the relocation of Sports Direct into Frasers which has left a 1,535sqm unit empty in Chantry Place, the closure of Jarrold Intersport on London Street (877sqm) and the closure of Argos at Riverside (949sqm). There are a number of other large retail spaces such as BHS, Debenhams and Toys R Us which remain vacant and explain why vacant floorspace is so much higher than vacancy rates for units.
44. Footfall levels have returned to pre pandemic levels in the city and there is clearly investment being made into Norwich. Whilst Norwich seemed to recover from the pandemic, this year presented different challenges in terms of the cost of living crisis. The next year or so will continue to be uncertain and challenging but so far Norwich has demonstrated that its retail and town centre offering is relatively robust and whilst in other part of the county independents have started to struggle, in Norwich on the whole they are still showing their strength although it will be interesting to see how they perform in the coming 12 months. Careful consideration does also needs to be given to what the survey is telling us about the long-term health of retailing in Norwich in the context of the challenges facing the British High Street/Town Centre retail sector, particularly in light of changes to the Use Classes Order, the NPPF and in terms of how we implement

¹⁰ Local Data Company, "H1 2023 retail and leisure trends analysis" (September 2023)

our current and future policies.

45. Table 1, provides city centre overview data on retail floorspace, enabling comparison over the time period of the plan. Table 2 provides an overview of vacancy rates for all town centre uses and Table 3 compares this to retail uses only.

Table 1: Norwich city centre – provision of A1 retail floorspace

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	208,146	173,069	33,086	1,991
October 2022	210,100	180,303	25,689	4,108
March 2022	213,701	181,137	32,050	514
July 2021	216,005	183,211	31,409	1,385
October 2020	215,949	193,658	21,686*	605
October 2019	217,539	195,891	11,992	9,656
June 2018	223,770	198,519	16,265	8,986
June 2016	223,987	208,342	13,006	2,639
Sept 2015	223,762	210,509	11,028	2,225
April 2014	224,653	213,652	9,513	1,488
August 2013	224,109	208,779	11,849	3,481
January 2011	227,377	203,948	21,035	2,394
July 2010	227,949	198,379	28,315	1,255
January 2010	228,432	206,379	21,810	243
July 2009	229,509	208,674	20,579	256
July 2008	229,120	213,902	14,248	970

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	938	823	104	11
October 2022	947	828	106	13
March 2022	966	833	128	5
July 2021	971	834	130	7
October 2020	976	833	140**	3
October 2019	971	873	88	10
June 2018	992	885	98	9
June 2016	1023	906	110	7
Sept 2015	1020	908	103	10
April 2014	1048	930	107	11
August 2013	1054	936	97	21
January 2011	1067	949	108	10
July 2010	1070	938	121	11
January 2010	1079	948	126	5
July 2009	1086	955	128	3
July 2008	1084	967	109	8

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2023	16.9%	15.9%	12.3%
October 2022	14.2%	12.2%	12.6%
March 2022	15.2%	15.0%	13.8%
July 2021	15.2%	14.5%	14.1%
October 2020	10.3%	10.0%	14.7%
October 2019	10.0%	5.5%	10.1%
June 2018	11.3%	7.3%	10.8%
June 2016	7.0%	5.8%	11.4%
Sept 2015	5.9%	4.9%	11.1%
April 2014	4.9%	4.2%	11.3%
August 2013	6.8%	5.3%	11.2%
January 2011	10.3%	9.3%	10.1%
July 2010	13.0%	12.4%	11.3%
January 2010	9.7%	9.5%	11.7%
July 2009	9.1%	9.0%	11.8%
July 2008	6.2%	6.2%	10.0%

Overall retail floorspace change

Since October 2022	Decreased by 1,954 sqm (0.9% decrease)
Since July 2008	Decreased by 20,974 sqm (9.2% decrease)

Table 2: Summary of all town centre uses vacancy rates

	As a proportion of all floorspace		As a proportion of all units	
	<u><i>Vacant+Refurbishment</i></u> <i>All</i>		<u><i>Vacant+Refurbishment</i></u> <i>All</i>	
	October 2022	October 2023	October 2022	October 2023
Norwich City Centre	15.4%	17.0%	13.0%	13.0%
Primary retail area	14.7%	16.2%	12.9%	11.8%
Secondary Retail area	20.0%	21.3%	11.0%	10.3%
Large District Centre	8.0%	12.3%	14.0%	15.1%
Rest of Centre	19.3%	20.0%	14.1%	15.7%

Table 3: Summary of retail only vacancy rates

	As a proportion of all retail floorspace		As a proportion of all retail units	
	<u><i>Vacant+Refurbishment</i></u> <i>All</i>		<u><i>Vacant+Refurbishment</i></u> <i>All</i>	
	October 2022	October 2023	October 2022	October 2023
Norwich City Centre	14.2%	16.9%	12.6%	12.3%
Primary retail area	14.9%	17.8%	12.6%	11.3%
Secondary Retail area	23.3%	25.4%	10.7%	12.1%
Large District Centre	5.6%	8.7%	12.1%	13.1%
Rest of Centre	12.2%	11.6%	15.8%	15.6%

The Primary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since Oct 22)
Primary Retail Area (Retail only)	17.8%	16.8%	11.3%	1.1% decrease

46. The extent of the primary area, containing the shopping centres and main comparison goods stores, is shown on Map 1.
47. The vacant available *floorspace* rate is currently 16.8% in the primary retail area which is a 4.6% increase on 2022 rates where 12.2% of available floorspace was empty. This is also a significant increase in the percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. Vacancy rates did improve between March 2022 and October 2022 (reduced from 15.0% to 12.2%) which indicated that the primary retail area had started to recover from the pandemic but unfortunately rates have gone up again which may be a result of the cost of living crisis but for Norwich can at least in part be attributed to the recent closure of Wilko, which at 5,600sqm has a very significant impact upon floorspace vacancy rates and also the relocation of Sports Direct into Frasers which has left a 1,535sqm unit empty in Chantry Place and the closure of Jarrold Intersport on London Street (877sqm).
48. Primary Area retail vacancy rates ‘as a proportion of all retail floorspace’ has also increased but the disparity between vacant +refurbishment is now only 1% (17.8% compared to 16.8% for vacant) whereas in 2022 the difference was 2.7% (14.9% compared with 12.2%). In 2022 the vacant Topshop store was being converted into a Morrisons and whilst Morrisons unfortunately pulled out the shop has since been occupied by Mountain Warehouse who have also retained their existing unit. The former Tesco unit on Guildhall Hill currently contributes most to the disparity. Work has been slow on the site and it is understood that the discharge of certain conditions has been delayed by nutrient neutrality as the wider redevelopment of the site include a hotel which constitutes overnight accommodation.
49. Whilst vacant floorspace has increased, the percentage of vacant retail *units* in the Primary Area has actually decreased from 12.6% in October 2022 to 11.3% in October 2023. Back in July 2021 vacancy rates for units reached 15.2% so this is a significant fall. In July 2021 there was concern that our vacancy rates were getting close to the national average (15.8% in H1 2021) but with national vacancy rates in H1 2023 being at 15.3% (Local Data Company, published September 2023¹¹), Norwich’s primary area vacancy rate is now 4% below the national average.
50. The fall in vacant units suggest that whilst some of the larger units remain vacant or are being vacated, the smaller units within the primary retail area are performing better with some attracting new occupiers. This reduction in vacancy

¹¹ Local Data Company, “H1 2023 retail and leisure trends analysis” (September 2023)

rates is encouraging and has shown that the city and its key shopping area has bounced back well from the pandemic and on the whole is coping with other economic challenges.

51. The overall amount of floorspace in A1 retail use within the primary area has decreased by 1,627m² between October 2022 and October 2023, and has reduced by 3 units. Between 2014 and 2018 the amount of retail floorspace has remained relatively constant however there was a significant reduction in retail floor space (5,461 m²) between 2018 and 2019 when a number of units within Castle Quarter changed use from A1 to other uses including a bowling alley, soft play, retro gaming centre, gym and other community/leisure facilities. This trend has continued with for example a retail unit changing to an NHS wellbeing hub in Castle Quarter although the rate of change does appear to be slowing down.
52. The change of use of a number of units away from A1 did prevent a number of units in Castle Quarter sitting empty and has no doubt helped reduce vacancy rates as a few years ago over a quarter of floorspace was vacant. Currently 11.6% of retail floorspace sits empty (down from 15.9% in October 2022) but taking into account all town centre uses only 10.2% is unoccupied (down from 11.3% in October 2022). Several smaller units are however currently vacant as 13 out of 53 A1 shops are unoccupied (24.5%) (Compared to 15 out of 57 or 26.3% in 2022) and 18 out of 93 of all units are empty (19.4%) (compared to 21 out of 95 or 22.1% in 2022). Longterm vacancies in Castle Quarter are still of concern but generally it is considered that the leisure uses that now occupy the Castle Quarter are preventing a number of particularly large retail units sitting empty and that although certain sectors are declining, they can be replaced with other success town centre business uses which will ultimately increase footfall.
53. Chantry Place (formerly Chapelfield) on the whole remains well occupied and at the time of the survey only 7 retail units were vacant out of a total of 85 (8.2%) and for all town centre uses 11 are vacant out of a total of 103 (10.7%). In terms of floorspace this is 6.8% for A1 and 8.4% for all town centre uses. Whilst there has been an increase in vacant floorspace (up from 3.6%) this is still well below the average for the primary retail area. Within Chantry Place whilst several shops have closed over the past year, these are often replaced very quickly with new tenants and it is encouraging to see that Frasers/Sports Direct have now opened in the former House of Frasers store which is the key anchor unit for the shopping centre.
54. The 2019 retail report set out how the Royal Arcade has experienced a significant change with half of the units being vacant (8 out of 16 units). The Arcade was taken on by a new owner and this historic arcade has gone from strength to strength. Currently only one unit is vacant and since the last survey Yalm has open which is a new foodhall showcasing some of the best independent chefs and kitchens from the region. The Market is also performing very well with only a handful of vacant stalls.
55. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 16.2% (up from 14.7% in 2022 and compared to retail only of 17.8%) and the percentage of vacant units is 11.8% (down from 12.9% and compared to retail only of 11.3%).
56. Table 4, below, provides retail floorspace data for the primary area.

Table 4: Primary shopping area**Retail floorspace (use class A1)**

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	144,235	118,591	24,217	1,427
October 2022	145,862	124,146	17,838	3,878
March 2022	147,573	125,219	22,136	218
July 2021	148,263	126,098	21,564	601
October 2020	148,498	135,424	12,469*	605
October 2019	150,094	134,405	6,148	9,541
June 2018	155,555	139,261	8,265	8,029
June 2016	155,389	143,867	8,883	2,639
Sept 2015	155,139	145,445	7,711	2,017
April 2014	155,884	149,059	5,865	960
August 2013	152,497	141,705	9,382	1,410
January 2011	173,789	157,817	13,967	2,005
July 2010	174,252	153,199	20,448	605
January 2010	174,525	160,541	13,909	75
July 2009	175,256	162,962	12,294	0
July 2008	175,028	168,511	6,434	83

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	505	448	51	6
October 2022	508	444	54	10
March 2022	521	445	73	3
July 2021	521	442	76	3
October 2020	524	442	79**	3
October 2019	523	465	50	8
June 2018	530	479	48	3
June 2016	562	484	72	7
Sept 2015	559	481	72	7
April 2014	579	499	74	6
August 2013	567	490	72	5
January 2011	574	524	45	5
July 2010	576	513	58	5
January 2010	578	524	53	1
July 2009	581	524	57	0
July 2008	584	537	46	1

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2023	17.8%	16.8%	11.3%
October 2022	14.9%	12.2%	12.6%
March 2022	15.1%	15.0%	14.6%
July 2021	14.9%	14.5%	15.2%
October 2020	8.8%	8.4%	15.6%
October 2019	10.5%	4.1%	11.1%
June 2018	10.5%	5.3%	9.8%
June 2016	7.4%	5.7%	14.0%
Sept 2015	6.3%	5.0%	14.1%
April 2014	4.4%	3.8%	13.8%
August 2013	7.1%	6.2%	13.6%
January 2011	9.2%	8.0%	7.8%
July 2010	12.1%	11.7%	10.1%
January 2010	8.0%	8.0%	9.2%
July 2009	7.0%	7.0%	9.8%
July 2008	3.7%	3.7%	7.9%

The Primary Area: Retail Frontages

57. Policy DM20 divides the primary area into a number of smaller 'frontage zones' (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 2. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).
58. Table 5 provides data on the percentage of retail uses in the primary area retail frontage zones in October 2023. Since March 2022 the percentage of retail in Castle Quarter has been below the minimum thresholds but all other frontages have remained relatively stable and policy compliant.
59. There have been changes to the percentage of retail frontage in all zones over the past year other than in PR03 (St Stephens/Westgate). There are now two frontage zones which are not policy compliant – Castle Quarter and Timberhill. Details of the changes to all frontage zones are set out below.
60. Within PC01 (Gentleman's Walk/Haymarket/Brigg Street) the retail frontage has reduced from 87.3% to 85.0%. The increase in non retail has been due to a change of use at 31 Gentleman's Walk from a retail premises to a noodle bar. This is a corner unit with a large frontage and is adjacent to the market.
61. Castle Quarter (PC02) has seen a significant shift away from retail and has become a leisure destination over the past few years. Back in 2018 only 38.3m (4.4%) of the frontage was non-retail but this increased to 246.1m (27.4%) in October 2022 which meant that over a quarter of the frontage was non retail. As well as leisure uses, the job centre moved into the centre which had a significant impact upon the frontage figures. Between October 2022 and October 2023 the retail frontage has reduced further from 72.6% to 68.0%. Two units with large frontages have changed away from retail and are now a NHS wellbeing hub and a virtual reality and gaming centre.
62. Within Chantry Place (PC03) there has actually been an increase in retail frontage from 95.8% to 96.9%. Over the past monitoring period Urban Outfitters have open within a unit previous occupied by Carluccio's restaurant.
63. Retail frontage has reduced from 71.3% to 70.7% in PR01 (Back of the Inns/Castle Street) and from 72.6% to 71.0% in PR02 (The Lanes East). These changes have been a result of changes of use from retail to a coffee and pastries café and to an events space.
64. There has been a significant change in PR06 (Timberhill/Red Lion Street) with retail reducing from 65.1% to 59.0%. This has been a result of a former retail unit changing to a restaurant. This change however now means that the percentage of retail has dropped below the minimum threshold set out within the SPD.
65. Overall, with the exception of Chantry Place, the city centre is seeing a gradual increase in the percentage of non retail uses and two of the frontage zones now have a retail frontage below the minimum threshold set out within the SPD. This is not surprising given the changes that have occurred nationally and also the more flexible approach that the planning authority is adopting. It is encouraging that several of the retail frontages remain at relatively comfortable levels above their minimum thresholds but it will be important to continue to monitor these changes in the future.

Table 5: Primary Area Retail Frontage Zones - Retail frontages in October 2023

Primary retail area core frontage zones

Frontage zone	Total frontage (m)	Total non-retail frontage Oct 2023	% A1 retail Oct 2023 (frontage)	% A1 retail Oct 2022 (frontage)	Minimum threshold (from 2014 SPD)
PC01: Gentleman's Walk/ Haymarket/Brigg Street	856.4	128.5	85.0%	87.3%	80%
PC02: Castle Mall (Levels 1 & 2)	898.1	287.7	68.0%	72.6%	80%
PC03: Chapelfield, upper & lower Merchants Hall and St Stephens Arcade	641.0	20.0	96.9%	95.8%	80%

Frontage zones in the rest of the primary retail area

Frontage zone	Total frontage(m)	Total non-retail frontage Oct 2023	% A1 retail Oct 2023 (frontage)	% A1 retail Oct 2022 (frontage)	Minimum threshold (from 2014 SPD)
PR01: Back of the Inns/Castle Street area	666.8	195.5	70.7%	71.3%	65%
PR02: The Lanes east (Bedford Street/Bridewell Alley)	1116.3	323.2	71.0%	72.6%	70%
PR03: St Stephens Street/Westlegate	821.5	114.9	86.0%	86.0%	80%
PR04: Castle Meadow north		N/A ¹²			
PR05: Chapelfield Plain		N/A ¹³			
PR06: Timberhill/Red Lion Street	434.2	178.0	59.0%	65.1%	60%

Key:

Green denotes no change or increase in A1 retail since 2022

Red denotes decrease in A1 retail since 2022.

Blue denotes frontage is within minimum A1 threshold.

Orange denotes minimum A1 frontage threshold has been breached.

¹² There is no defined frontage in this zone

¹³ There is no defined frontage in this zone

The Secondary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurbis)	Vacant units	Retail floorspace change (since October 22)
Secondary area (Retail only)	25.4%	23.4%	12.1%	0.6% decrease

66. Map 3 shows the extent of the secondary area.

67. The vacant available *floorspace* rate experienced a significant increase between 2016 and 2018 when it rose from 2.8% to 17.2%. Between 2018 and 2021 it rose further to 23.1% and over the past couple of years it has remained relatively stable and is now at 23.4%.

68. The percentage of vacant retail *units* in the Secondary Area also increased between 2016 and 2018 with a rise from 7.0% to 7.7%. This has continued to increase and over the past 12 months has risen from 10.7% to 12.1%.

69. The overall amount of floorspace in A1 retail use continues to decrease but this has only fallen by 118m² since the 2022 report although there has been a reduction in units in the Secondary Shopping area from 178 in 2022 to 174 in 2023.

70. The high vacancy rate in the secondary retail area is of some concern as the figure is at the highest level in this area since monitoring commenced in 2008. However the very high floorspace vacancy rate can be attributed to the closure and subsequent vacancy of Toys R Us in Cathedral Retail Park in April 2018 which has an individual floor area of 3,222m² and the closure of a further unit at the Retail Park which has a floorspace of 632m². Within the Cathedral Retail Park vacant floorspace currently stands at 72.2% and vacant units is 50%. If the Cathedral Retail Park is omitted from the secondary area altogether vacant floorspace would be 9.7%, vacant available floorspace would be 7.1% and vacant units would be 11.2%.

71. It is also worth noting that a planning application was approved on 18th October 2023 for the consolidation and refurbishment of both vacant units within the Cathedral Retail Park with the proposed occupier being Homes Bargains. If this permission is implemented, then this would have a dramatic impact upon vacancy rates within the secondary retail area. Subject to there being no other changes within the secondary retail area, this would mean that vacant floorspace would fall to 7.3% which would be well below the national average and the lowest in the city centre. Furthermore within the secondary retail area vacancy rates '*as a proportion of all retail units*' are one of the lower in the city centre and whilst they continue to creep up and have now reached 12.1% this is very competitive when compared to the GB national average retail vacancy rate of 15.3%¹⁴.

72. Policy 11 of the Joint Core Strategy identifies that "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". The

¹⁴ Local Data Company, "H1 2023 retail and leisure trends analysis" (September 2023)

secondary retail area includes some streets which provide a specialist mix of shops and excluding the Cathedral Retail Park, is performing very well in providing independent retail diversity and by adapting rapidly it appears that it remained resilient during the pandemic and continues to perform well within the current economic climate.

73. As reported in October 2022 the low vacancy rates in this area (excluding Cathedral Retail Park) has on the whole corresponded to the Local Data Companies findings that independents are more resilient than multiples with growth in independents largely being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (restaurants, bars and fast food). Independents benefited from government support measures and business rates relief during the pandemic which enabled them to remain operational. However the Local Data Company have now reported that independents have started to struggle with the net decline in H1 2023 being the worst recorded net change for the sector since records began. In Norwich vacant units within the secondary retail area have increased from 10.7% to 12.1% which is a noticeable change. Whilst the vacancy rate is still relatively low compared to the national rate, there is some concern that Norwich's independent stores are being impacted by economic factors which may unfortunately mean that some are closing their doors for good. This will need to be monitored carefully within 12 months time.

74. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 21.3% (up from 20.0% in 2022 but compared to retail only of 25.4%) and the percentage of vacant units is 10.3% (down from 11.0% in 2022 and compared to retail only of 12.1%). This would suggest that other town centre uses such as restaurants, leisure uses and business premises are performing slightly better than the retail sector.

Table 6: Secondary area

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	21,325	15,915	4,991	419
October 2022	21,443	16,454	4,989	0
March 2022	21,826	16,752	5,074	0
July 2021	21,859	16,775	5,060	24
October 2020	21,933	17,180	4,753*	0
October 2019	21,611	17,651	3,960	0
June 2018	21,772	17,921	3,741	110
June 2016	21,858	21,243	615	0
Sept 2015	21,793	21,148	594	51
April 2014	21,958	21,569	273	116
August 2013	21,926	21,083	715	131
January 2011	17,785	16,612	878	295
July 2010	17,980	16,709	1,107	164
January 2010	18,076	16,788	1,189	99
July 2009	18,262	17,008	1,207	47
July 2008	18,167	17,604	1,022	81

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	174	153	19	2
October 2022	178	159	19	0
March 2022	179	163	16	0
July 2021	183	165	17	1
October 2020	185	169	16**	0
October 2019	181	167	14	0
June 2018	182	168	12	2
June 2016	185	172	13	0
Sept 2015	184	173	10	1
April 2014	185	177	5	3
August 2013	187	176	9	2
January 2011	190	174	13	3
July 2010	192	173	16	3
January 2010	194	173	18	3
July 2009	196	173	22	1
July 2008	194	176	15	3

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2023	25.4%	23.4%	12.1%
October 2022	23.3%	23.3%	10.7%
March 2022	23.2%	23.2%	8.9%
July 2021	23.3%	23.1%	9.8%
October 2020	21.7%	21.7%	8.6%
October 2019	18.3%	18.3%	7.7%
June 2018	17.7%	17.2%	7.7%
June 2016	2.8%	2.8%	7.0%
Sept 2015	3.0%	2.7%	6.0%
April 2014	1.8%	1.2%	4.3%
August 2013	3.9%	3.3%	5.9%
January 2011	6.6%	4.9%	6.8%
January 2010	7.1%	6.6%	9.3%
July 2008	5.6%	5.7%	7.7%

The Secondary Area: Retail Frontages

75. Policy DM20 divides the secondary area into a number of smaller ‘frontage zones’ (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 3. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).

76. Table 7 provides data on the percentage of retail uses in the secondary area retail frontage zones. Out of the three secondary areas that have frontage zones, one (SR03: St Benedicts) is below the minimum threshold as set out in the SPD. During the monitoring period the proportion of retail has reduced slightly within one of the frontage zones (SR01: The Lanes West (Pottergate/Dove Street/Lower Goat Lane), it has not changed within one (SR02: Upper St Giles) and has actually increased ever so slightly in SR03: St Benedicts). Overall the retail frontages still appear relatively healthy and within two of the three retail frontages zones remain at relatively comfortable levels above their minimum thresholds.

Table 7: Secondary area retail frontage zones

Frontage zone	Total frontage (m)	Total non-retail frontage October 2023	% A1 retail October 2023 (frontage)	% A1 retail October 2022 (frontage)	Minimum threshold (from 2014 SPD)
Primary retail area core frontage zones					
SR01	391.3	109.6	72.0%	75.8%	70%
SR02	121.7	39.4	67.6%	67.6%	60%
SR03	638.0	270.3	57.6%	57.5%	60%
SR04	No defined frontage				
SR05	No defined frontage				
SR06	No defined frontage				

Large District Centres

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since October 22)
Large District Centres (Retail only)	8.7%	8.7%	13.1%	0.5% decrease

77. Map 4 shows the extent of the LDCs. Riverside was included in these statistics from August 2013 onwards, following the removal of it from the Primary Retail Area and its redesignation as part of the Large District Centre.

78. The vacant available floorspace in the LDCs is currently 8.7% which is higher than it was in October 2022 when it was 5.6% but lower than in 2021 when 9.1% of floorspace was vacant. Back in 2019 only 3.3% of available floorspace was unoccupied. It is however still low compared to both the city and national average and regarded as a low figure for a shopping area which does not form a central part of the city's retail offer.

79. The percentage of vacant retail *units* in the LDCs has increased since October 2022 (from 12.1% to 13.1%). The difference between vacant floorspace and vacant units would suggest that the larger units are faring well but that the smaller units are harder to find and retain retailers.

80. In terms of Riverside in October 2022 the vacancy rate was very low (4.9% for floorspace and 8.5% for units). Over the past 12 months one of the smaller vacant units has now been occupied by Greggs but a medium sized unit has been vacated by Argos. Mothercare closed in 2020/21 and has still not been occupied. This means that now 9.6% of retail floorspace is vacant and 11.8% of retail units are vacant. Riverside has largely been a car based destination but it is hoped that the routes established within the 'St Anne's Quarter' development will create a more attractive walking and cycling link between Riverside and the city centre.

81. The Magdalen Street, Anglia Square & St Augustine's LDC has also seen an increase in retail vacancies. Vacant floorspace has increased from 6.3% in October 2022 to 7.9% and the number of vacant units has increased from 12.1% to 13.1%. This is still relatively competitive when compared to the GB national average retail vacancy rate of 15.3%¹⁵. This centre has repositioned itself as a niche area of speciality/ethnic retailers and restaurants. The historic relatively low vacancy rates in this area also corresponded to the Local Data Companies findings last year that independents are more resilient than multiples with growth in independents being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (restaurants, bars and fast food). Although the Local Data Company is now recording a record high net decline in independents nationally and with vacancy rates creeping up it may be that some of Norwich's independent stores are struggling in this challenging economic climate.

¹⁵ Local Data Company, "H1 2023 retail and leisure trends analysis" (September 2023)

82. Anglia Square is subject to proposals for comprehensive re-development and planning permission was granted in July 2023 for up to 1,100 dwellings and up to 8,000 sqm (NIA) of flexible retail, commercial and other non-residential floorspace including a community hub. This area is likely therefore to experience significant levels of change and regeneration over the coming years.

83. The overall amount of floorspace in A1 retail use has remained stable since Riverside was included as part of the Large District Centre in August 2013.

84. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) has increased from 8.0% in October 2022 to 12.3% in October 2023 (and this compares to retail only of 8.7%) and the percentage of vacant units is 15.1% (up from 14.0% in October 2022) which compares to retail only of 12.1%.

Table 8: Large District Centres (Magdalen Street, St Augustine's Street, Anglia Square & Albion Way Riverside)

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	32,216	29,398	2,818	0
October 2022	32,385	30,561	1,824	0
March 2022	32,695	29,623	3,051	21
July 2021	32,379	29,426	2,932	21
October 2020	32,015	29,974	2,041*	0
October 2019	32,164	31,043	1,071	50
June 2018	32,609	30,421	1,748	440
June 2016	32,353	30,534	1,750	69
Sept 2015	32,353	31,237	1,047	69
April 2014	32,647	31,594	784	269
August 2013	32,602	31,256	301	1,045
January 2011	18,314	14,934	3,311	69
July 2010	18,218	14,947	3,202	69
January 2010	18,239	14,811	3,359	69
July 2009	18,289	15,049	3,031	209
July 2008	18,139	15,017	3,031	91

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	137	119	18	0
October 2022	141	124	17	0
March 2022	142	124	18	1
July 2021	138	123	14	1
October 2020	138	120	18**	0
October 2019	137	123	13	1
June 2018	140	124	14	2
June 2016	139	125	13	1
Sept 2015	139	129	9	1
April 2014	140	130	8	2
August 2013	77	67	7	3
January 2011	135	107	27	1
July 2010	134	109	24	1
January 2010	135	106	28	1
July 2009	136	112	22	2
July 2008	135	111	22	2

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i>$\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}$</i>	As a proportion of retail floorspace excluding space being built or refitted <i>$\frac{\text{Vacant}}{\text{All}}$</i>	As a proportion of all retail units <i>$\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}$</i>
October 2023	8.7%	8.7%	13.1%
October 2022	5.6%	5.6%	12.1%
March 2022	9.4%	9.3%	12.7%
July 2021	9.1%	9.1%	10.9%
October 2020	6.4%	6.4%	13.0%
October 2019	3.5%	3.3%	10.2%
June 2018	6.7%	5.4%	11.4%
June 2016	5.6%	5.4%	10.0%
Sept 2015	3.4%	3.2%	7.2%
April 2014	3.2%	2.4%	7.1%
August 2013	4.1%	1.0%	13%
January 2011	18.5%	18.1%	20.0%
July 2010	18.0%	17.6%	17.9%
January 2010	18.8%	18.4%	20.7%
July 2009	17.7%	16.6%	16.2%
July 2008	16.7%	16.8%	16.0%

Rest of the City Centre

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurbishments)	Vacant units	Retail floorspace change (since October 22)
Rest of City Centre (Retail only)	11.6%	10.2%	15.6%	0.4% decrease

85. This area covers all shops within the city centre which are not included in the defined areas discussed above. There have been some boundary changes which were first reflected in the 2014 monitor. As such, the figures prior to 2014 are not directly comparable with current figures.
86. The vacant available *floorspace* in the rest of the city centre was at 15.4% in March 2022 and when including refurbishments the vacancy rate in 2021 reached a high of 19.2%. However since then a number of units have been occupied with the last survey in October 2022 showing vacancies of 10.0% and when including refurbishments 12.2%. These have remained relatively stable and are now at 10.2% for available floorspace and 11.6% when including refurbishments. This is around 5-6% lower than the city centre averages.
87. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%; however in October 2019 the rate was exceptionally low at only 5.9% which was a bit of an anomaly. Increased vacancies during 2020 and 2021 suggested that a number of new businesses struggled to survive during the pandemic but it is encouraging to see vacancy rates return to relatively low levels which suggests that the rest of the city centre is actually performing quite well in terms of retail floorspace.
88. The number of vacant retail *units* in the rest of the city centre has remained the same as it was in October 2022 at 19 however the total number of retail units has actually increased by two which does mean as a percentage vacant units has reduced from 15.8% to 15.6%. A higher vacancy rate for units compared to floorspace would suggest that some of the smaller units remain vacant.
89. The overall amount of floorspace in A1 retail decreased significantly between March 2022 and October 2022 (by 10.3%). There has only been a very slight decrease during this monitoring period reducing by 29sqm (0.4%).
90. The statistics from the past few years suggest that there has been a lot of change and turnover in the 'rest of the city centre' area which is expected within the more peripheral city centre shopping streets. Although a number of businesses closed over the pandemic, the 'rest of the city centre' seemed to have bounced back in a similar way to some of the more central shopping areas. The loss in retail floorspace during previous monitoring periods would suggest that there has been quite a bit of diversification with a number of retail units changing to other town centre uses.
91. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 20.0% (up from 19.3% in 2022) which compares to retail only of 11.6% and the percentage of vacant units is 15.7% (up from 14.1% in 2022) which compares to retail only of 15.6%). Despite all town centre vacancy rates increasing, these are still noticeably lower than in 2021 where 22.0% of all town centre floorspace was vacant and 18.1% of all town centre

units were empty.

Table 9: Rest of city centre

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	10,371	9,165	1,061	145
October 2022	10,410	9,142	1,038	230
March 2022	11,607	9,544	1,788	275
July 2021	13,503	10,912	1,852	739
October 2020	13,503	11,080	2,423	0
October 2019	13,670	12,792	813	65
June 2018	13,834	11,769	1,658	407
June 2016	14,387	12,629	1,758	0
Sept 2015	14,475	12,711	1,676	88
April 2014	14,164	11,430	2,591	143
August 2013	17,084	14,738	920	1,426
January 2011	17,400	14,495	2,880	25
July 2010	17,500	13,524	3,559	417
January 2010	17,593	14,240	3,353	0
July 2009	17,702	13,655	4,047	0
July 2008	17,786	13,310	3,761	765

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2023	122	103	16	3
October 2022	120	101	16	3
March 2022	124	101	22	1
July 2021	129	104	23	2
October 2020	129	104	25	0
October 2019	130	118	11	1
June 2018	135	110	23	2
June 2016	137	125	12	0
Sept 2015	138	125	12	1
April 2014	144	124	19	1
August 2013	157	137	12	8
January 2011	168	144	23	1
July 2010	192	167	23	2
January 2010	172	145	27	0
July 2009	173	146	27	0
July 2008	171	143	26	2

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2023	11.6%	10.2%	15.6%
October 2022	12.2%	10.0%	15.8%
March 2022	17.8%	15.4%	18.5%
July 2021	19.2%	13.7%	19.4%
October 2020	17.9%	17.9%	19.4%
October 2019	6.4%	5.9%	9.2%
June 2018	15%	12%	18.5%
June 2016	12.2%	12.2%	8.8%
Sept 2015	12.2%	11.6%	9.4%
April 2014	19.3%	18.3%	13.9%
August 2013	13.7%	5.4%	12.7%
January 2011	16.7%	16.6%	13.7%
July 2010	22.7%	20.3%	12.0%
January 2010	19.1%	19.1%	15.7%
July 2009	22.9%	22.9%	15.6%
July 2008	21.1%	22%	15.2%

District and Local Centres

92. Policy DM21 of the Development management policies plan establishes A1 retail use thresholds of 60% for District Centres and 50% for Local Centres.
93. Vacancy rates in District and Local Centres focus on units only. Between 2021 and 2022 there was a significantly reduction in vacancy rates and overall vacancies reduced from 11.6% in 2021 to 6.5% in 2022. Over the past 12 months there has been a very slight increase in vacancies with 6.9% of units now sitting empty however this is nearly half that of the 12.3% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances Local and District Centres are faring extremely well. During the pandemic more people started to shop locally and this seems to be continuing.
94. Overall these figures would suggest that District and Local Centres are continuing to perform their function and to offer an appropriate range of local services and facilities and over the past few years Norwich's District and Local Centres have continued to who their strength and importance.

District Centres

Headline figures	Vacant units	Number of units change
District Centres	6.0%	1.5% increase

95. Whilst vacancy rates have increased from 5.6% to 6.0% between October 2022 and October 2023, vacancy rates are still significantly lower than pre pandemic times where 11.6% of units within District Centre stood vacant in 2018. The total number of vacant units in the 10 District Centres is currently only 12 which compares to 19 in 2021 and 23 in 2018.
96. In term of total number of units, there has been an increase in two District Centres. Within DC04 – Plumstead Road the total number of units has increased by 1 and within DC05: Aylsham Road/Mile Cross the total number of units has increased by 2. This was a result of units subdividing. There has not been a reduction in units in any of the District centres.
97. The percentage of non-retail units currently stands at 43.0% which is 0.4% lower than in 2022. Since 2019 there has been a trend of an increasing number of units in non-retail use so this is a bit surprising. In terms of units, the total number of non retail units is 86 out of 200. This number has actually stayed the same since 2022 but given the total number of units has increased, this has affected the percentage. There has only been an increase in non retail in one District Centres which is DC04: Plumstead Road but this already exceeded the 40% non-retail threshold. The percentage of non retail has actually decreased in one District Centre which is Aylsham Road/Mile Cross where it reduced from 50.0% to 48.5%. There has been no change since 2022 in the District Centres which exceed the 40% non-retail threshold set out in Development management policy DM21. This remains as follows:
- DC03: Eaton Centre
 - DC04: Plumstead Road

- DC05: Aylsham Road/Mile Cross
- DC07: The Larkman
- DC08: Dereham Road/Distillery Square
- DC09: Hall Road

98. A few of these centres have non-retail percentages not too much above 40% and as shown in previous monitoring years it only takes one or two units changing to retail to satisfy the policy ambition and it is encouraging to see that within this monitoring year the total number of retail units has actually increased. However patterns both nationally and locally over recent years have shown that things are generally moving in the opposite direction with an increase in non-retail uses and this is very much encouraged by government changes to the use class order and permitted development rights which were introduced a couple of years ago. Whilst it is recognised that some non-retail units such as restaurants and cafes, along with community, service and leisure uses can add to the vitality and viability of a retail centre there is concern that the change of use to residential would have a significantly detrimental impact upon District Centres and their ability to meet local need. So far the impacts as a result of the changes to the Use Classes Order and Permitted Development Order have actually been quite minimal but this will need continual monitoring. Furthermore during the pandemic Norwich's District Centres seemed to thrive with more people shopping locally. The past monitoring period has continued to show the strength of the District Centre but it will be interested to see whether other economic facts such as the cost of living crisis impact upon the centres in the coming months and years.

99. In terms of the individual District Centres the following is of note:

100. The vacancy rate within Bowthorpe district centre DC01 has doubled during the monitoring period and has increased from two units (11.8%) to four units (23.5%). This is now the District Centre with the highest vacancy rate. The percentage of non retail units has stayed the same and at 35.3% sits below the 40% threshold.
101. Over the monitoring period, Lidl has closed within the Drayton Road District Centre (DC02). This has meant that the number of vacant units has increased from 1 to 2 and Drayton Road now has the second highest vacancy rates of all District Centres. The non-retail percentage rate has not changed and is only 26.7% which is well clear of the 40% recommended maximum guideline.
102. Vacancies in DC03: Eaton Centre have continued to reduce with now only one unit out of 17 being vacant (which is a unit within Waitrose). The number of non-retail units has not changed but with 58.8% of units being non retail this is the highest of all District Centres.
103. The total number of units within DC04: Plumstead Road has increased from 32 to 33 due to the subdivision and occupation of a vacant unit. With the occupation of another vacant unit the vacancy rate has reduced from 9.4% (3 units) to 3.0% (one unit). The percentage of non retail has increased from 43.8% to 48.5%.
104. DC05: Aylsham Road/Mile Cross has seen an increase in the number of units by two due to the subdivision of a unit. Vacancy rates have remained low at only 4.2% (1 units). As a result of the new units being retail the percentage of

non retail has reduced from 50.0% to 45.8%. A new Lidl opened adjacent to the District Centre several years ago which is just outside of the District Centre boundary (so not counted as a unit within this monitoring report). This appears to have strengthen the centre.

105. Earlham House district centre DC06 was previously recognised as one of the poorest performing district centres in terms of vacancy rates in 2016. However, since that time the centre has benefitted from some refurbishment. There has been no change in the monitoring period with it still only having one vacancy and the highest proportion of retail units of all District centres.
106. There are two district centres which have all of their units occupied which are The Larkman (DC07) and Hall Road (DC09) centres. Both of these fully occupied District Centres have over 40% non-retail and there have been no changes within the monitoring period.
107. In 2022 Dereham Road/Distillery Square (DC08) was fully occupied following a period in 2021 were it had four vacant units. Over the monitoring period there has only been one change within the district centre which was the closure of one takeaway which now gives a vacancy rate of 2.7%.
108. There has been no change in vacancy rates or the percentage of non retail within Sprowston Road/Shipfield (DC10). This centre only has one vacant unit and 36.8% non retail.

Table 10: District Centres defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
DC01	Bowthorpe	17	4	23.5%		6	35.3%	
DC02	Drayton Road	15	2	13.3%		4	26.7%	
DC03	Eaton Centre	17	1	5.9%		10	58.8%	
DC04	Plumstead Road	33	1	3.0%		16	48.5%	
DC05	Aylsham Road/ Mile Cross	24	1	4.2%		11	45.8%	
DC06	Earlham House	17	1	5.9%		5	29.4%	
DC07	The Larkman	14	0	0.0%		7	50.0%	
DC08	Dereham Road/ Distillery Square	37	1	2.7%		18	48.6%	
DC09	Hall Road	7	0	0.0%		4	57.1%	
DC10	Sprowston Road/ Shipfield	19	1	5.3%		7	36.8%	
TOTAL		200	12	6.0%		86	43.0%	

Key

Vacancy rate is **unchanged** since last survey

Vacancy rate is **up** since last survey

Vacancy rate is **down** since last survey

Proportion of A1 retail units is **ABOVE** 60% policy

Proportion of A1 retail units is **BELOW** 60% policy



Local centres

Headline figures	Vacant units	No of units change
Local Centres	7.4%	0.0% change

109. Table 11 shows vacancy rates and percentage of non-retail units for the 28 local centres.

110. Of the 325 units, the number of vacant units is 24. This is an increase of one unit from October 2022 which has increased the percentage from 7.1% to 7.4%. This is still significantly lower than the city centre vacancy rate. Over half of all local centres (15 out of 28) are now fully occupied which compares to 14 in 2022 and 10 in 2021.

111. Improvements in vacancies since 2021 have taken place in 5 local centres which are LC02 Hall Road/Queens Road, LC07 St Augustine's Gate, LC13 Catton Grove Road/Ring Road, LC14 Magdalen Road and LC29 Aylsham Road/Copenhagen Way. The local centres which have had increased vacancies during the monitoring period are LC03 Hall Road/ Southwell Road, LC06 Unthank Road, LC10 Aylsham Road/ Glenmore Gardens, LC11 Aylsham Road/ Boundary Road, LC18 Earlham West Centre, LC30 St Stephens Road. There is less of a disparity in vacancy rates than in 2021. Back in 2021 LC01 for example had a vacancy rate of 42.9% whilst other Local Centres were fully occupied. Now the worst performing local centre is LC10 with less than a quarter of units being empty.

112. The percentage of non-retail units across all of the centres is 51.1% up from 50.8% in 2022 and 46.0% in 2021. This means that the percentage of non retail has now exceed the 50% threshold. However there has been no change in the number of local centres which are not policy compliant and this remains at 12. There is now one centre which sits at the recommended 50% threshold and 15 which have more than 50% of units as retail. In 2022 2 units sat at the 50% threshold and 14 had a proportion of A1 retail units above the 50% target. Over the monitoring period there has been two centres where the proportion of non retail has reduced and only one where the proportion of non retail has increased.

113. The twelve local centres that have exceeded the DM21 policy threshold and have greater than 50% non-retail uses are listed below. LC20 has been added to this list and LC18 has been removed.

- LC02: Hall Road/Queens Road
- LC06: Unthank Road;
- LC07: St Augustine's Gate;
- LC10: Aylsham Road/Glenmore Gardens
- LC11: Aylsham Road/Glenmore Gardens
- LC14: Magdalen Road
- LC15: Sprowston Road/Silver Road
- LC17: Bishop Bridge Road

- LC18: Earlham West Centre REMOVE as now 50%
- LC20: Colman Road, The Parade (ADDDDED)
- LC26: UEA; and
- LC28: Magdalen Road/Clarke Road
- LC29: Aylsham Road/Copenhagen Way.

114. LC18: Earlham West Centre has exactly 50% non- retail. Any changes of use of existing A1 units to non-retail uses will cause the DM21 policy threshold to be exceeded.

Table 11: Local Centres¹⁶ defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC01	Hall Road/ Trafalgar St	8	0	0.0%		2	25.0%	
LC02	Hall Road/ Queens Road	29	4	14.0%		18	62.1%	
LC03	Hall Road/ Southwell Road	7	1	14.3%		3	42.9%	
LC04	Grove Road	14	0	0.0%		6	42.8%	
LC05	Suffolk Square	9	0	0.0%		4	44.4%	
LC06	Unthank Road	43	1	2.3%		24	55.8%	
LC07	St Augustine's Gate	8	1	12.5%		6	75.0%	
LC08	See footnote							
LC09	Aylsham Road/ Junction Road	8	1	12.5%		3	37.5%	
LC10	Aylsham Road/ Glenmore Gardens	13	3	23.1%		7	53.8%	
LC11	Aylsham Road/ Boundary Road	13	2	15.4%		9	69.2%	
LC12	Woodcock Road	7	0	0.0%		2	28.6%	
LC13	Catton Grove Road/Ring Road	12	0	0.0%		5	41.7%	

¹⁶ Local centres at **Dereham Road/Distillery Square** (previously LC08) and **Sprowston Road/Shipfield** (previously LC16) were redesignated as district centres following the development of new anchor foodstores and renumbered as DC08 and DC10 respectively in the 2014 local plan. The local centre at **St Stephens Road** newly designated in that plan (LC30) falls partly within and partly outside the city centre. The retail floorspace within that part of the local centre is included within the floorspace and unit totals in Table 4.

LC14	Magdalen Road	14	0	0.0%		9	64.3%	
LC15	Sprowston Road/ Silver Road	8	0	0.0%		5	62.5%	
LC16	See footnote							
LC17	Bishop Bridge Road	8	0	0.0%		6	75.0%	
LC18	Earlham West Centre	22	3	13.6%		11	50.0%	
LC19	Colman Road/ The Avenues	16	3	18.8%		5	31.3%	
LC20	Colman Road, The Parade	10	1	10.0%		6	60.0%	
LC21	Woodgrove Parade	9	0	0.0%		2	22.2%	
LC22	St John's Close/ Hall Road	10	0	0.0%		4	40.0%	
LC23	Tuckswood centre	5	0	0.0%		1	20.0%	
LC24	Witard Road, Heartsease	9	0	0.0%		2	22.2%	
LC25	Clancy Road, Heartsease	5	0	0.0%		2	40.0%	
LC26	UEA	9	1	11.1%		7	77.8%	
LC27	Long John Hill	5	0	0.0%		2	40.0%	
LC28	Magdalen Road/ Clarke Road	8	1	12.5%		5	62.5%	
LC29	Aylsham Road/ Copenhagen Way	5	0	0.0%		4	80%	
LC30	St Stephens Road	11	2	18.2%		6	54.5%	
TOTAL		325	24	7.4%		166	51.1%	

Key

Vacancy rate is **unchanged** since last survey

Vacancy rate is **up** since last survey

Vacancy rate is **down** since last survey



Proportion of A1 retail units is **ABOVE** 50% policy target

Proportion of A1 retail units is **BELOW** 50% policy target

Proportion of A1 retail units is **AT** 50% policy target



Conclusions

115. Retail floorspace vacancy rates have increased in all areas of the city centre between October 2022 and October 2023; however as shown in figure 12 the total number of vacant units has continued to reduce. Vacancy rates have also risen slightly within the District and Local Centres.
116. High vacancy rates were experienced in July 2021 which was unsurprising given the challenging circumstances faced by retailers during the pandemic and as shown in the October 2022 report it was very encouraging to see how well Norwich recovered and bounced back from this very difficult period. Nationally retailers are now experiencing further economic challenges brought about by the cost of living crisis, and Norwich has unfortunately seen a number of closures as a result. Notwithstanding this Norwich has however continued to see investment and whilst some multiples and independent have ceased trading, others have opened within the past couple of years.
117. Norwich's independent retailers have historically been very resilient and have generally performed well and this can be shown by the low (albeit increasing) vacancy rates within both the secondary retail area (when excluding the Cathedral Retail Park) and the Magdalen Street, Anglia Square & St Augustine's LDC where vacant floorspace rates are 9.7% and 7.9% respectively. This is lower than the primary shopping area and low when compared to a national average retail vacancy rate of 15.3%. However one question often posed about the independent market is that of long-term sustainability. Many of these units have shorter average length of occupancy and a higher rate of churn across the market, due to a lack of infrastructure and financial backing so it will be interesting to see how these areas perform in the coming years, particularly as retailers facing increasing costs and consumers face a cost of living crisis. As reported by the Local Data Company, nationally independents have experienced the worst recorded net change for the sector since records began and it will be interesting to see how this sector performs within Norwich over the coming year.
118. This monitoring report now also looks at all town centre use vacancy rates as well as retail. Nationally leisure vacancy rates are lower than retail and whilst it is difficult to compare due to different methodologies of collecting and analysing data, the overall vacancy rate for the city centre does increase slightly when other town centre uses are taken into account although they are quite significant discrepancies between the primary and secondary retail areas and the large district centre and rest of centre.
119. In terms of the total amount of retail floorspace within the city centre, it is continuing to decrease although the rate at which it is decreasing has slowed. Within this monitoring period 1,943 sqm of retail floorspace was lost which is a 0.9% decrease. This now means that since 2008 Norwich city centre has lost around 9.2% of its retail provision. The retail however is generally not being lost to residential or being demolished; instead the city is experiencing diversification and the floorspace is generally changing to other town centre uses. Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that is likely to be

brought in through the GNLP it is anticipated that this trend will continue, but we just do not yet know at what rate.

120. This trend of diversification can particularly be seen within Castle Quarter where the retail frontages is no longer within the recommended minimum percentage of A1 use as set out in the 'Main Town Centre Uses and Retail Frontages' Supplementary Planning Document (2014). Furthermore PR06: Timberhill/Red Lion Street now becomes the second primary retail frontage which is not policy compliant. However the other retail frontages all remain relatively stable and comfortably within the recommended minimum percentage of A1 uses with the percentage of retail actually increasing in Chantry Place and staying the same in St Stephens Street/Westlegate. In terms of the secondary area retail frontage zones one out of three (SR03: St Benedicts) is below the minimum threshold and during the monitoring period the proportion of retail reduced slightly within one frontage, stayed the same within one and increased in one. Overall it would still appear that the retail frontages appear relatively healthy.
121. Vacancy rates in District and Local Centres have also increased slightly from 6.5% in 2022 to 6.9% in 2023. This is still significantly lower than it was in 2021 when 11.6% of units were vacant and significantly lower than the 12.3% shop vacancy rate in the city centre. This indicates that despite the challenging circumstances local and district centres are faring extremely well. The July 2021 report suggested that more people were shopping locally and it would appear that this may still be case, despite less people now working from home.
122. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and as a result of the pandemic. Whilst it is likely that these challenges will have ongoing impacts for the viability of some retail businesses, the past couple of years has shown how resilient the majority of our businesses are. Vacant floorspace has increased over the past 12 months and whilst some multiples and independents have ceased trading within Norwich, there is clearly investment happening with new chains arriving.
123. It is also encouraging how footfall has returned to pre pandemic levels. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around and enjoy their time within the city.
124. It is however important to acknowledge that Norwich, as with all cities, faces an extremely uncertain time ahead. Whilst Norwich largely recovered from the impacts of the pandemic, vacant floorspace rates have risen quite significantly over the past 12 months which may be a result of rising costs, inflation and interest rates which have impacted both retailers and consumers. The Local Data Company predicts that vacancy rates will rise in the second half of the year however they feel that the worst is over for consumers and with interest rates hopefully settling at the end of the year they feel that vacancy rates may fall slightly and then remain relatively stable until 2025. This seems fairly optimistic and with the challenges ahead, some shops and business will inevitable struggle and look to close stores so it would not be a surprise if vacancy rates do continue to rise over the next year.

125. It is also important to acknowledge that there are many changes that can now take place within retail centres without the direction of the council which include the change of use to other town centre uses but also the change of use to residential without the need for full planning permission. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified several risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned that extending the use of permitted development rights to change to residential could be hugely detrimental to this. Without being able to consider the impact that the loss of town centres uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses at ground floor level which will result in residential interspersed with town centre uses. This will not only affect the way that our high streets function but it could reduce rather than increase footfall. For this reason the Council has concern that the uncontrolled and piecemeal loss of town centre uses could be a threat to the vitality and vibrancy of our high street and it is going to be very important to continue to monitor change over the coming few years.

126. Notwithstanding the above, given the circumstances Norwich has demonstrated that it remains relatively robust and is a thriving retail centre in the East of England. Whilst retail floorspace has increased over the past 12 months, the number of vacant retail units continues to fall and footfall has returned to pre pandemic levels. To maintain a thriving city centre the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced ahead, including working closely with Norwich BID and other key stakeholders.

Table 12: ‘At a Glance’ The direction of travel of vacancy rates and retail floorspace in Norwich since October 2022

Area	Available vacant floor space	All vacant floor space including refurbishment	Number of vacant Units	Overall Floor Area	Overall units
City Centre	↑	↑	↓	↓	↓
Primary Area	↑	↑	↓	↓	↓
Secondary Area	↑	↑	↑	↓	↓
Large District Centres	↑	↑	↑	↓	↓
Rest of city centre	↑	↓	↓	↓	↑
District Centres	N/A	N/A	↑	N/A	↑
Local Centres	N/A	N/A	↑	N/A	

Key

↑ = increase

↓ = decrease

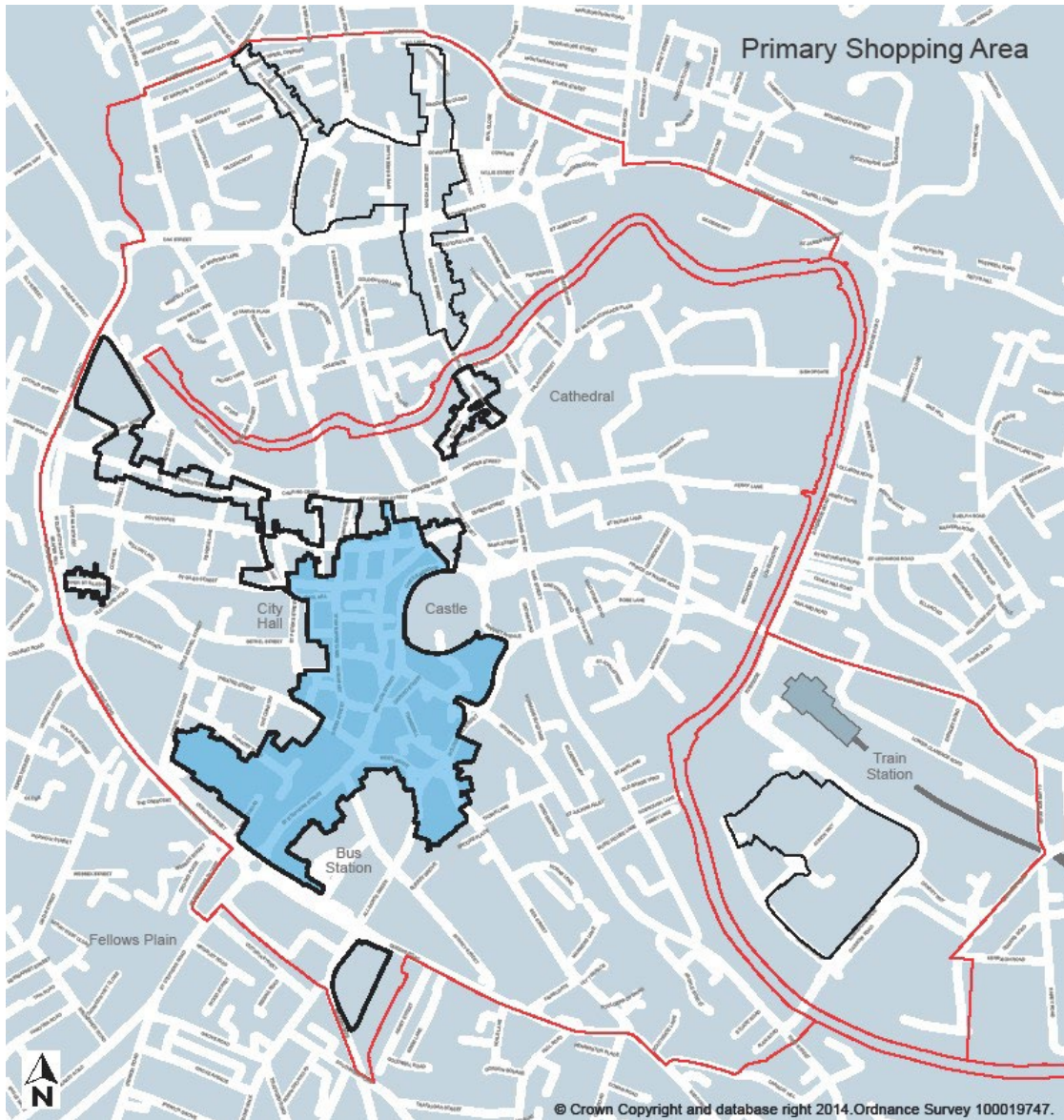
Red = Moving in a negative direction

Green = Moving in a positive direction

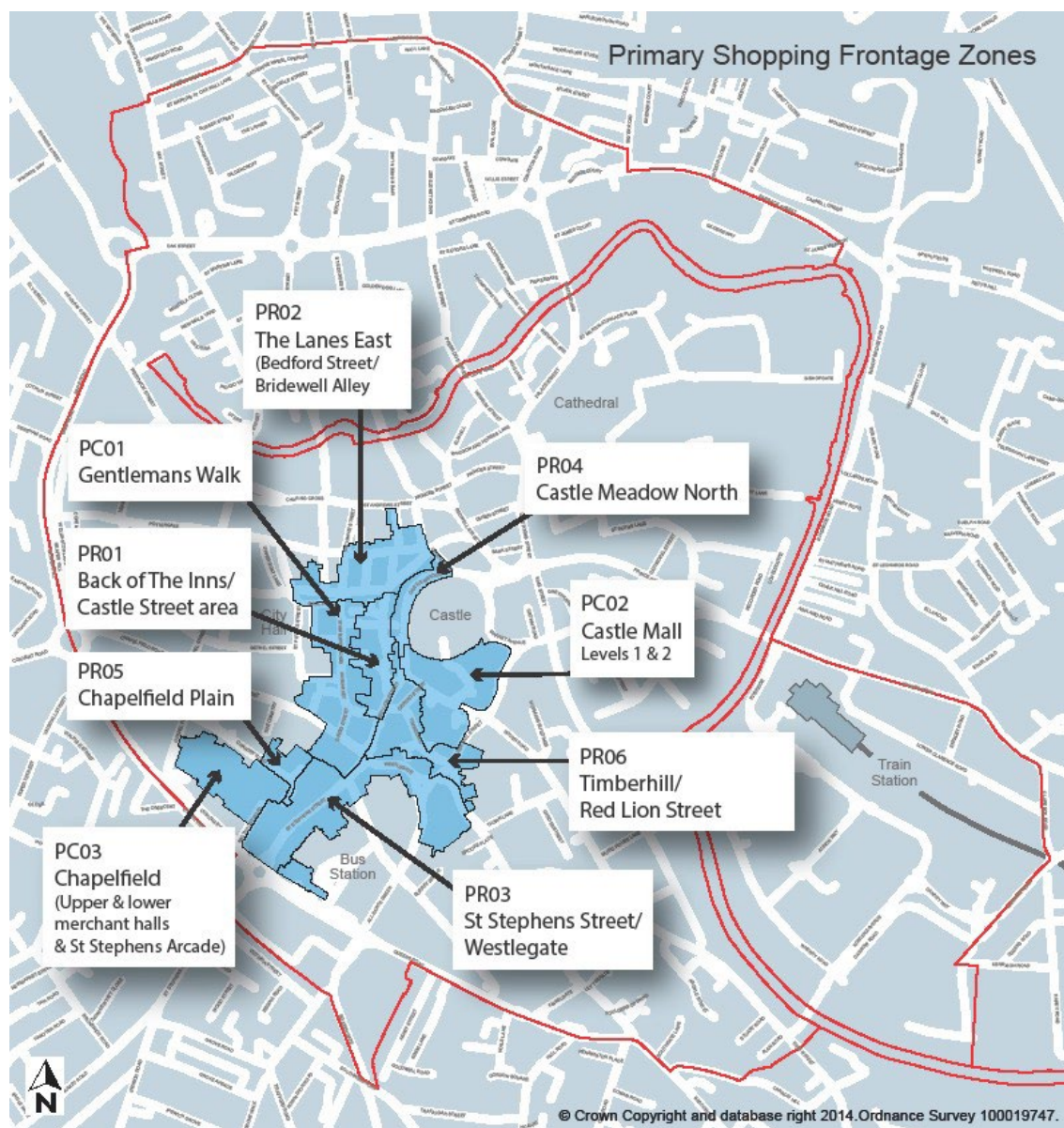
Grey = No change

Supporting Maps

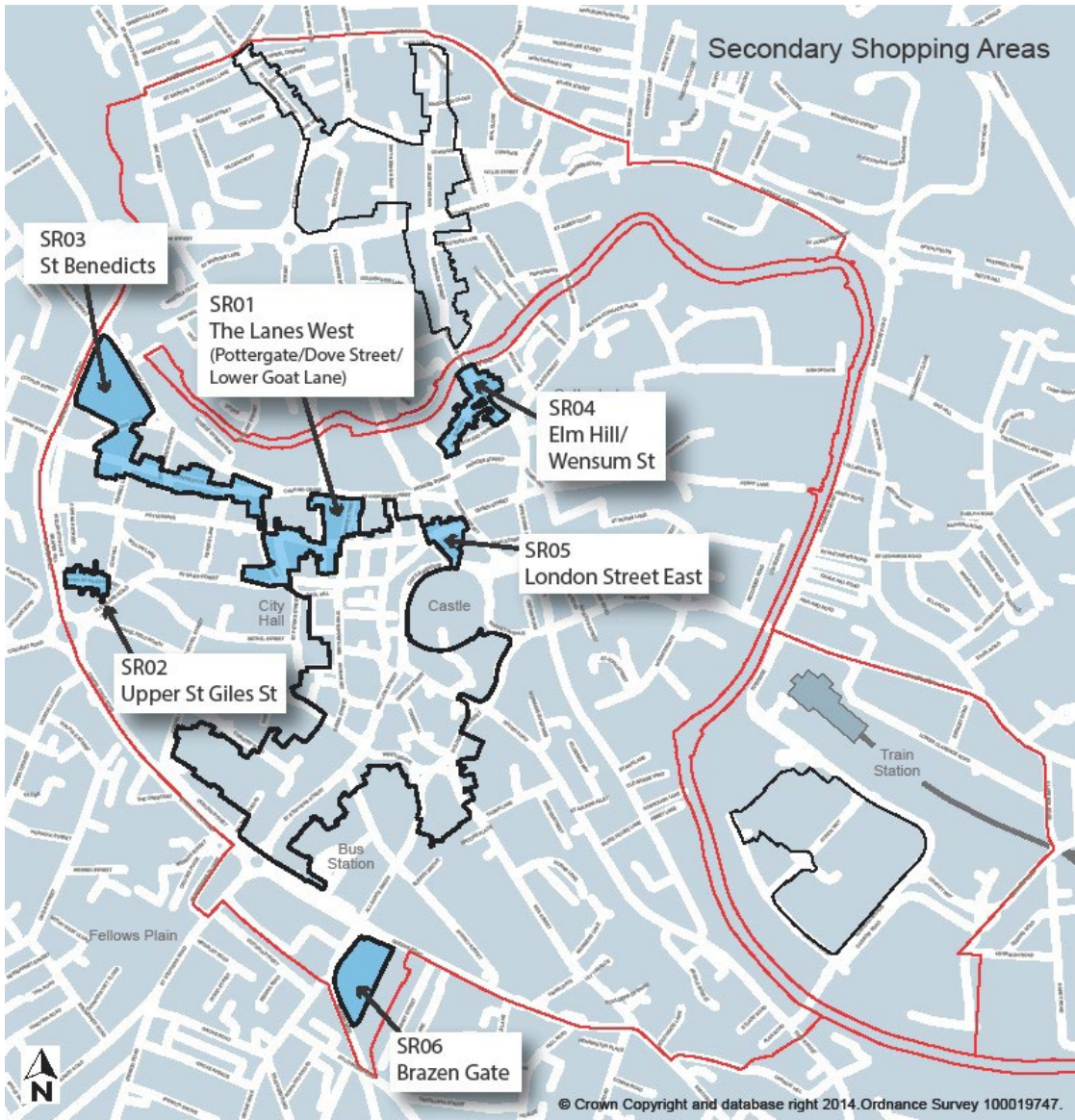
Map 1: Primary shopping area



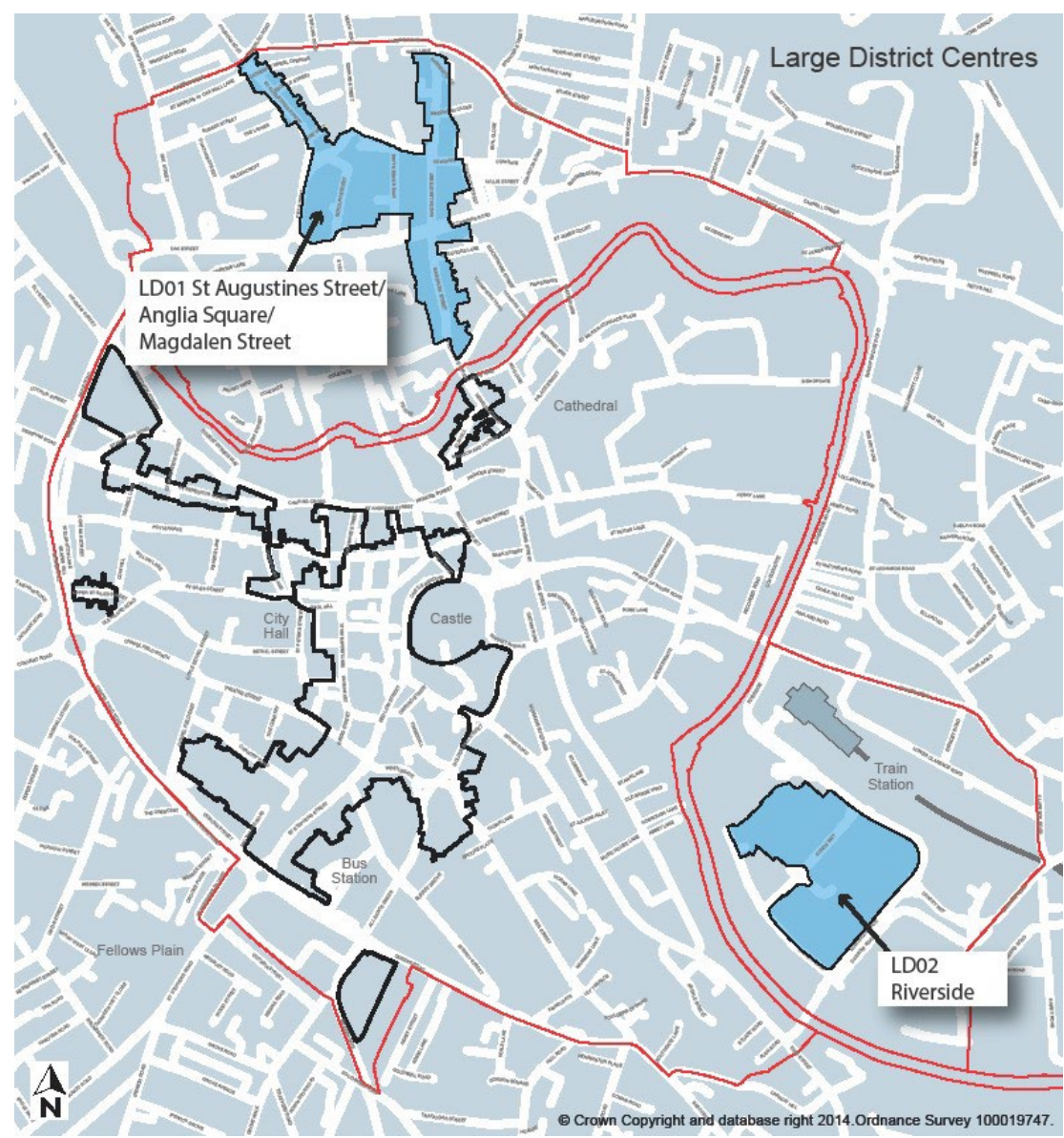
Map 2: Primary area frontage zones



Map 3: Secondary shopping areas



Map 4: Large district centres (Magdalen Street, Anglia Square, St Augustine's Street & Riverside)



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