

### **Sustainable development panel**

**Date: Wednesday, 19 September 2018**

**Time: 09:30**

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

#### **Committee members:\***

##### **Councillors:**

Stonard (chair)

Maguire (vice chair)

Carlo

Hampton

Lubbock

Maxwell

Stewart

Thomas (Va)

#### **For further information please contact:**

Committee officer: Jackie Rodger

t: (01603) 212033

e: [jackierodger@norwich.gov.uk](mailto:jackierodger@norwich.gov.uk)

Democratic services

City Hall

Norwich

NR2 1NH

[www.norwich.gov.uk](http://www.norwich.gov.uk)

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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 held on 18 July 2018

4 **Local Development Scheme 2018-21**

9 - 32

**Purpose** -To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a three year period to late 2021.

5 **Retail Monitor 2018**

33 - 38

**Purpose** - To report the findings of the 2018 Norwich Retail Monitor.

The Retail 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.

6 **Greater Norwich Local Plan**

Verbal report on content of forthcoming consultation on submitted new sites.

Date of publication: **Tuesday, 11 September 2018**





**Sustainable development panel**

**09:40 to 10:50**

**18 July 2018**

Present: Councillors Maguire (vice chair following appointment, in the chair), Carlo, Fullman, Hampton, Lubbock and Trevor

Apologies: Councillors Stonard (chair following appointment) and Stewart

**1. Appointment of chair**

**RESOLVED** to appoint Councillor Stonard as chair for the ensuing civic year.

**2. Appointment of vice chair**

**RESOLVED** to appoint Councillor Maguire as vice chair for the ensuing civic year.

(Councillor Maguire in the chair.)

**3. Declarations of Interest**

There were no declarations of interest.

**4. Minutes**

**RESOLVED** to agree the accuracy of the minutes of the meeting held on 21 March 2018

**5. Planning Policy and Update and Work Programme**

The head of planning services presented the report which updated members on the current work programme of the planning policy team and the key work items that would be reported to the panel.

During discussion members commented on the growth of purpose built student accommodation, particularly in Mancroft ward, and whether there was evidence that it released housing to the local community or that there was a need for the development of more purpose built student accommodation. The head of planning services referred to the development of purpose built student accommodation and said that current development and that in the pipeline met demand and projected student numbers. He pointed out that it was a competitive market. Changes to the National Planning Policy Framework, meant that purpose built student accommodation would in future contribute towards meeting housing need targets. Student numbers had grown at a rate in excess of the growth in purpose built accommodation available in the 2000s and recent development served to meet this need. Members commented on the trend for former local authority housing to be

converted into houses in multiple-occupation (HMOs) and the affect that this had in certain areas of the city. The head of planning services advised caution in targeting HMOs in that not all tenants were students and that HMOs provided accommodation for other single people, including some vulnerable people. The planning policy team leader would be leading the review of student housing and the evidence from the study would inform policy development. Members noted that in parts of the city centre there were already concerns about large concentration of student housing affecting the character of the local area, and in future large schemes might need to be scaled down or dispersed. The Greater Norwich Local Plan would consider possible allocations for growth around the University of East Anglia (UEA) but the vast majority of shared student housing and purpose built accommodation was within the city council district. The council would most likely develop its own policy on student housing as part of the policy formulation process.

Discussion then moved to affordable housing viability assessments and concern that that the policy in the Joint Core Strategy should be updated annually to ensure that the council did not lose out on developer contributions. The head of planning services said that the current policy in the JCS set the target of 33 per cent affordable housing for larger developments. Members noted the process of independent, viability assessments by the district valuer that were based on a formula which reflected the actual costs of construction and property prices. It was also noted that the practice of accepting commuted sums from developers for affordable housing on smaller sites provided scope of provision elsewhere on larger sites which registered social landlords found easier to manage.

**RESOLVED** to note the contents of the report.

## **6. Greater Norwich Local Plan Update**

The head of planning services presented the report. He explained that the timescale for the delivery of the Greater Norwich Local Plan (GNLP) had been reviewed and the Greater Norwich Development Partnership (GNDP) had agreed to seek adoption of the plan in September 2021. There would be a review of the Community Infrastructure Levy (CIL) in parallel with the development of the plan. The city council collected CIL and under the current arrangements, 15 per cent was used for neighbourhood projects with the remaining 85 per cent pooled with that of the partner authorities to provide infrastructure to support growth in and around Norwich.

During discussion the head of planning services answered questions on the report. This included discussion on the variation of CIL charges in relation to local areas. High charges in Reigate and Banstead were justified because of the high house prices in this area. The city charged just over £100 per square metre for residential development which came into the middle of the range of charges for CIL. Members were advised that under the current arrangements CIL could not be used to provide affordable housing although S106 agreements were still sought to secure such provision. The government had proposed to simplify the process by removing the requirement for CIL charging authorities to maintain a Regulation 123 list of the infrastructure projects that were intended to be wholly or partly funded by CIL. The head of planning services commented that it would make sense to include affordable housing in the list of infrastructure projects that could be funded by CIL, as restricting it from CIL had a significant impact on the amount of affordable housing that could

be delivered. However, he doubted such a change to the arrangements would be made.

A member asked a number of questions on the development of the GNLP. She referred to the changes to the timetable and the statement in the report that the agreed option “will reduce the risk of issues of soundness or procedure being raised through the examination process or legal challenges”. The head of planning services explained that both legal advice and the independent “critical friend” had advised that the original timetable could not be delivered and that the timetable be reviewed so that it was more robust in relation to the publication of the draft plans (Regulations 18 and 19) and incorporate changes to the NPPF. The head of planning services suggested that technical questions relating to whether sustainable appraisal reports would be published with the consultation documents and the calculation of base-lines, should be directed to the GNLP team. He pointed out that the assessment of the sites proposed during consultation would not assume delivery of the proposed Norwich western link.

The head of planning services then commented on the key findings of the high level consultation responses set out in paragraph 5(f) of the report. The greater support was for concentration of development around Norwich, but there would need to be further discussion with the GNLP partners on a settlement hierarchy approach.

In reply to a member’s question the head of planning services relating to the new sites coming forward in Norwich (as set out in paragraph 6(f) of the report) and explained that these were either sites where there was planning permission or proposals had been put forward for development. The sites proposed at the UEA were for some student accommodation and buildings for academic use.

Members also commented on the Campaign for Rural England’s suggestion that the city needed a green belt. Norwich did not meet the criteria that required a green belt in national guidance. The city had natural corridors and river valleys that constrained development.

**RESOLVED** to note the contents of the report.

CHAIR





**Report to** Sustainable development panel  
19 September 2018  
**Report of** Director of regeneration and development  
**Subject** Local Development Scheme 2018-21

**Item**

**4**

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### **Purpose**

To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a three year period to late 2021.

### **Recommendation**

That members agree the Local Development Scheme and recommend that cabinet approves it for publication under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by section 111 of the Localism Act 2011).

### **Corporate and service priorities**

The report helps to meet the corporate priorities a prosperous and vibrant city, a safe, clean and low carbon city, and a healthy city with good housing. Although the review of the LDS is not a service plan priority, its preparation and regular review is a statutory requirement.

### **Financial implications**

None.

**Ward/s:** All Wards

**Cabinet member:** Councillor Stonard - Sustainable and inclusive growth

### **Contact officers**

Judith Davison, planning policy team leader	01603 212529
Graham Nelson, head of planning services	01603 212530

### **Background documents**

None

## Report

1. The Local Development Scheme (LDS) must be prepared as part of the statutory process of plan making. It is essentially the work programme and project plan for the preparation of the various planning policy documents making up the local plan for the city.
2. Preparation of an LDS is required by section 15 of the Planning and Compulsory Purchase Act, as amended by section 111 of the Localism Act 2011. The Localism Act has amended procedures for LDS production: a local planning authority has only to make a formal resolution to adopt the scheme and publish it on their website in order for it to take effect. There is no requirement to consult on the local development scheme prior to publication, or to submit it to the government for formal endorsement.
3. The legislation gives local authorities considerable leeway in the form and content of the LDS. However it requires as a minimum the local planning authority, when publishing the LDS, to make the up-to-date text of the scheme available, provide details of any amendments made to the scheme, and information on its compliance (or non-compliance) with the timetable for the preparation and revision of documents identified within it.
4. The preparation of the revised LDS is being undertaken in coordination with the preparation of schemes for South Norfolk and Broadland councils given that all three councils are jointly working on preparation of the Greater Norwich Local Plan so need to work to the same timescales on that major workstream.
5. The revised LDS will run to autumn 2021 and will entirely replace the version published in June 2016. It will be rolled forward periodically to ensure that it is as up-to-date and flexible as possible.

### Progress since the previous Local Development Scheme

6. Since the last LDS<sup>1</sup> was published in June 2016, significant work has been undertaken on preparation of the Greater Norwich Local Plan including consultation on draft (Regulation 18) issues and options and site proposals documents in early 2018. In addition the Norfolk Strategic Planning Framework was adopted in early 2018, a non-statutory strategic policy statement to inform the next round of statutory plan making and helping the Norfolk local planning authorities to fulfil the statutory Duty to Cooperate.
7. Other examples of progress include: adoption of the Landscape Trees Supplementary Planning Document in June 2016, review of the Statement of Community Involvement in November 2016, setting up of a Self-Build register in 2016, adoption of a non-statutory Policy Guidance Note for Anglia Square in March 2017, publication of the Brownfield register for Norwich in December 2017, and adoption of the River Wensum Strategy by the city council and partners in summer 2018.

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<sup>1</sup> [https://www.norwich.gov.uk/downloads/file/1671/local\\_development\\_scheme](https://www.norwich.gov.uk/downloads/file/1671/local_development_scheme)

8. Work on options for Houses in Multiple Occupation (HMOs), including a potential Article 4 Direction, was committed in the 2016 LDS. This has not come forward to date due to resource issues but is programmed for later 2018 / early 2019, to be considered alongside production of guidance on purpose built student accommodation (see paragraph 18 below).
9. Legacy work relating to the expired Northern City Centre, in the form of site briefs, masterplans etc, has not been delivered other than the Policy Guidance Note for Anglia Square which has informed the current planning application for this major regeneration site. Following refusal by Cabinet in June 2018 of applications for designation of a neighbourhood forum / area for the Cathedral, Magdalen and St Augustine's area, the city council has designated the northern city centre area as a neighbourhood area. There is currently no designated neighbourhood forum for this area, however this may change in the lifetime of this LDS, and may lead to production of a neighbourhood plan for the northern city centre in due course.

### **The revised LDS**

10. The focus of the revised LDS is on the preparation and adoption of strategic, high-level planning policies and site allocations for Norwich. This will be achieved through two key planning documents:
  - a) The **Greater Norwich Local Plan** (GNLP) is the only formal development plan document in the LDS. It is being prepared jointly with Broadland and South Norfolk districts, with support from Norfolk County Council, and looks ahead to 2036. The GNLP first appeared as a workstream in the 2016 LDS. Its timeline is amended in the revised LDS to reflect changes in the production timescales arising from further consultations in the Regulation 18 stage. Adoption is now anticipated in late 2021.
  - b) The **Norfolk Strategic Planning Framework** (NSPF) is a non-statutory strategic policy statement facilitating joint working on strategic planning policy across the Norfolk authorities and helping to fulfil the statutory Duty to Cooperate. The NSPF was finalised and approved by partner authorities in early 2018 (delayed from the original target of mid-2017 by a number of factors including changes in government guidance and evidence taking longer than expected to be produced for example). Revisions to national policy in the revised National Planning Policy Framework (NPPF) 2018 will require ongoing cooperation between the authorities through production of a Statement of Common Ground (essentially a revision to the NSPF), which is currently underway.

### **Supplementary Planning Documents and guidance**

11. Review of the 2015 Affordable Housing SPD is currently underway with anticipated adoption in early 2019. This will take account of the revised NPPF, particularly in relation to development viability.
12. Non-statutory guidance for purpose-built student accommodation will be produced in late 2018/early 2019 in response to a significant increase in planning applications for such accommodation in the last couple of years.

13. Preparation of a development brief to guide the future development of Prospect House is underway with likely adoption by Cabinet in autumn 2018.

### **Other committed and potential workstreams**

14. The LDS also identifies other workstreams for the planning policy service which will be necessary in order to satisfy national policy requirements in the Housing and Planning Act, the Housing White Paper, the revised NPPF and elsewhere. Whilst some of these workstreams are already in progress or committed, others are aspirational and depend on identifying additional resources to deliver them. Members should be aware that resources in the planning policy service are limited and capacity to undertake further work in this category is constrained by the need to prioritise core planning work around the statutory Greater Norwich Local Plan and the NSPF.
15. The NPPF requires local planning authorities to review policies in adopted local plans at least once every 5 years, and assess whether they need updating. Policies should then be updated as necessary. The council will review policies in the Development Management (DM) Policies Plan in late 2019 (following the publication of the draft GNLP) to take account of changing circumstances, updated evidence, and / or relevant changes in national planning policy. If this assessment results in the need for a partial or full review of the DM Policies Plan the LDS will be revised to include this new work stream. Policies in the Site Allocations and Site Specific Policies Plan (2014) and Joint Core Strategy for Broadland Norwich and South Norfolk (adopted 2011, with amendments 2014) will also need to be assessed, however this is likely to be a relatively limited exercise as these policies will be superseded by the GNLP once it is adopted.
16. Consequential changes to the Policies Map will be required upon adoption of the GNLP in September 2021 as the latter will supersede the Site Allocations and Site Specific Policies Plan (due to expire in 2026). Other changes to the Policies Map may also arise from review of DM policies.
17. Part 1 of the Brownfield Land Register for Norwich was published in December 2017. The Town and Country Planning (Brownfield Land Register) Regulations 2017 require that such registers must be updated at least annually, so this will be an ongoing commitment. Part 2 of the register is intended to include sites listed in Part 1 which are considered suitable for the granting of planning permission in principle for residential development. The council does not intend to produce a Part 2 register at this stage.
18. The council will review issues around Houses in Multiple Occupation (HMOs) in the city in 2018/19, in coordination with its work on purpose built student accommodation, including whether there is justification to introduce an Article 4 Direction for small HMOs (containing up to 6 persons) in parts or all of the city.
19. Potential additional work streams noted in the LDS include support for a neighbourhood plan for the northern city centre, should a community group be designated as an neighbourhood forum, and commence preparation of a neighbourhood plan. Also, following the announcement by Unilever to close the Colman site in Norwich, there is a potential opportunity to produce planning policy to guide the future redevelopment of this site, which may also include

adjacent landholdings. The form and scope of such policy has yet to be agreed. In addition, the LDS notes that a review of the Community Infrastructure Levy (CIL) is intended to be undertaken in parallel with the GNLP, and is likely to be introduced around the time of the latter's adoption in late 2021.

## **Conclusions**

20. The chief challenges to meet the timescales set out in this revised LDS relate to national planning policy changes and availability of staff resources.
21. Local planning authorities are being urged through changes to national planning policy including the revised NPPF, to accelerate the delivery of housing on underused brownfield land. For example the introduction of a housing delivery test in late 2018 may impact on the available staff resources to progress some work streams in the LDS, as too may the council's efforts to pro-actively encourage greater housing delivery through implementation of specific housing allocations. In addition there are many other aspects of the planning policy team's workload which are not included in the LDS (such as monitoring and implementation of local plan policies) which require a significant staff resource. New planning priorities may also emerge during the period 2018-21 which may impact on achievement of LDS timescales for some work streams.
22. Information about the work streams identified in this LDS and any new priorities will be reported to Sustainable Development Panel as required and will be included in any future revisions to the LDS as appropriate.

## **Appendix 1**

### **Local Development Scheme for Norwich 2018-21**

# Local development scheme for Norwich

Revised  
September  
2018

DRAFT



## 1. Introduction

- 1.1 A Local development scheme (LDS) must be prepared under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). It must identify the documents that will be prepared to set out the strategy for the development and use of land in the local planning authority's area – collectively called development plan documents. Essentially, an LDS is a project plan which identifies (among other matters) the documents which, when prepared, will make up the Local Plan for the area. It must be made publicly available and kept up-to-date. It allows the public and stakeholders to find out about planning policies in their area, the status of any emerging policies in the development plan, and the details of and timescales for production of all relevant documents.
- 1.2 This Local development scheme applies only to the area of the city for which Norwich City Council is the local planning authority. It should be noted that part of the administrative area of Norwich (namely the tidal river Wensum downstream of New Mills and an area of land at Cremorne Lane) falls within the planning jurisdiction of the Broads Authority, which is subject to a separate local plan and LDS.
- 1.3 In addition to providing information about the main development plan documents in preparation (which legislation requires to be included), this LDS also provides detail about the preparation of Supplementary Planning Documents (SPDs) and other informal planning guidance and adopted local development documents, to provide a full account of the planning policies that will operate in Norwich. This document also refers to committed and potential workstreams contributing to documents which may in due course form part of the Local development scheme.
- 1.4 This draft LDS once finalised will replace the previous LDS which was published in June 2016.

### Summary of progress since the last LDS

- 1.5 Since publication of the last LDS, significant progress has been made on the preparation of the Greater Norwich Local Plan (GNLP), and on the Norfolk Strategic Planning Framework (NSPF) which was adopted in early 2018. Further details are set out in the main body of this document.
- 1.6 The Statement of Community Involvement (SCI) was revised and published in November 2016, and replaces the version published in July 2013. The SCI is the council's code of practice for involving the community in planning issues, including decisions about plan-making and on planning applications.
- 1.7 A Policy Guidance Note (PGN) for Anglia Square redevelopment was adopted in March 2017. This does not take the form of a Supplementary planning document as originally envisaged; instead it is non-statutory guidance produced in relation to a particular form of development proposed for the site. It is not an attempt to revise the development plan or to provide comprehensive advice on the full range of development possibilities



that the site could accommodate. The PGN has helped to inform the current planning application for redevelopment of the Anglia Square site.

- 1.8 The Brownfield Register (Part 1) was published in December 2017. This includes sites that have been assessed as being appropriate for residential development, such as sites with planning permission and allocations in local plans. The register will be updated at least once a year.
- 1.9 A Self-build Register for Norwich was established in 2016 to enable individuals and organisations to register their desire for land for self-build or custom-built housing. The register will enable the council to monitor the demand for self and custom build plots. A local connection test and annual fee were introduced in 2017.
- 1.10 The River Wensum Strategy was adopted by Norwich City Council (in June 2018) and by the other partner authorities during summer 2018. The strategy development and ongoing delivery is led by Norwich City Council working in partnership with the Broads Authority, Norfolk County Council, the Environment Agency and the Wensum River Parkway Partnership. This is a non-statutory strategy aimed at facilitating change and regeneration in the river corridor by helping to change perceptions of the city as a visitor destination, and acting as an economic driver to attract investment. It promotes greater use of the river Wensum, in particular promoting improved access/signage to the river, increasing activity on the river, enhancing its function as a key piece of green infrastructure and its contribution to biodiversity, and increasing its attractiveness to tourists and visitors.
- 1.11 In June 2018 the city council's Cabinet formally designated the area which was previously the subject of the Northern City Centre Area Action Plan as a neighbourhood area. This followed applications for designation of a wider area (the Cathedral, Magdalen and St Augustine's Street area - CMSA) as a neighbourhood area and for designation of a forum for that area. Following a public consultation in early 2018, both applications were refused by Norwich City Council and the Broads Authority (the latter being involved as part of the River Wensum falls within the proposed area) in June 2018. The Localism Act 2011, S61G(5) states that, where a local authority refuses an application for designation of a neighbourhood area because they consider the specified area to be inappropriate as such, they must exercise their powers of designation to secure that some or all of the specified area forms part of one or more areas designated as neighbourhood area.
- 1.12 The newly designated Northern City Centre Neighbourhood Area is already well-established as an appropriate area for planning purposes, and development of a neighbourhood plan could help to positively build on the area's significant regeneration potential. At this stage there has been no public expression of interest by a community group in developing a neighbourhood plan for this area but this may happen during the lifetime of this LDS.

## 2. Scope of the Norwich Local development scheme

2.1 The Local development scheme covers the following types of documents:

### Development plan documents (DPDs)

- 2.2 Development plan documents or DPDs are the formal policy documents which make up the statutory development plan (the *local plan*) for Norwich. Once adopted, these have full legal weight in decision making. The council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the local plan unless material considerations indicate otherwise. The local plan may either be a single document or a number of separate related documents.
- 2.3 The adopted local plan for Norwich comprises the *Joint Core Strategy for Broadland, Norwich and South Norfolk* (the JCS) adopted in March 2011, amendments adopted January 2014; the *Norwich Site Allocations and Site Specific Policies Local Plan* (the Site Allocations Plan), adopted December 2014 and the *Norwich Development Management Policies Local Plan* (the DM Policies Plan), adopted December 2014. The *Northern City Centre Area Action Plan* as stated earlier no longer forms part of the local plan, although policy 11 of the JCS remains adopted and requires regeneration of the northern city centre in accordance with NCCAAP principles. Accordingly a commitment to regenerate the northern city centre will remain a material consideration in determining planning applications in that area.
- 2.4 The JCS will be replaced by the emerging Greater Norwich Local Plan (GNLP), which will run until 2036 and is scheduled to be adopted in 2021.
- 2.5 Each document must be prepared in accordance with a nationally prescribed procedure set out in the national Local Planning Regulations for England, which were last reviewed in 2012 and in accordance with the National Planning Policy Framework 2018. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be *adopted* by the city council and come into force.
- 2.6 Certain other documents must be published alongside each DPD, including:
- the *sustainability appraisal (SA) report* of the plan at each stage (a *sustainability appraisal scoping report* is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will use);
  - A *habitats regulations assessment (HRA)* if policies and proposals in the plan are likely to have impacts on important natural and wildlife habitats protected by national and international legislation. This is also known as the "Appropriate Assessment".

- a *policies map*, setting out the DPD's policies and proposals on a map base (if relevant);
- a *statement of consultation* summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
- copies of any representations made;
- any other supporting documents considered by the council to be relevant in preparing the plan;
- an *adoption statement* and *environmental statement* (when the plan is adopted).

### Supplementary planning documents (SPD)

- 2.7 Supplementary planning documents (SPD) help to support and explain in more detail how the city council will implement particular policies and proposals in the local plan. SPD can also take the form of master plans, detailed design briefs or development briefs for sites identified for future development ("allocated") in the plan, as well as for other emerging sites.
- 2.8 SPD can be reviewed frequently and relatively straightforwardly to respond to change, whereas a review of the policies in the plan is a longer and more complex process.
- 2.9 National *Planning practice guidance* (NPPG) states that supplementary planning documents should build upon and provide more detailed advice or guidance on the policies in the Local Plan and should not be used to add unnecessarily to the financial burdens on development. SPD should not introduce new or include excessively detailed policy guidance, but ought to be used only where it can clarify and amplify existing policy and set out how it will help to bring forward sustainable development.
- 2.10 There are currently 5 adopted SPDs in place which support the policies in the JCS and DM Policies plan. A review of the Affordable Housing SPD (2015) is identified in this LDS. Other informal planning guidance will also be produced during the lifetime of this LDS (see below).

### Other local plan documents

- 2.11 In addition to the progress report provided by this Local development scheme, a number of other documents must be prepared alongside the local plan, but do not form part of it.
- 2.12 A **Statement of community involvement** (SCI) must show how the council intends to involve the community in plan preparation and planning decision making. It is not a local development document but legally it must set out how documents specified in the LDS will be consulted on.
- 2.13 To ensure that plans and policies are effective, an **Annual monitoring report** (AMR) must also be prepared to record progress on implementing the local plan and how new development and change taking place in the previous year has contributed to achieving its targets. From 2011, the AMR for Norwich has been incorporated within a combined

monitoring report for the JCS prepared jointly by Norfolk county council and the three district authorities covering greater Norwich. The most recent JCS AMR, for the monitoring period April 2016 to March 2017, was published in March 2019.

#### **Associated documents and initiatives**

2.14 Although not required to be published as part of the Local development scheme programme, the following additional documents and initiatives are listed in this LDS for information, as they will inform the preparation of future statutory development plan documents and/or provide a wider context for their implementation.

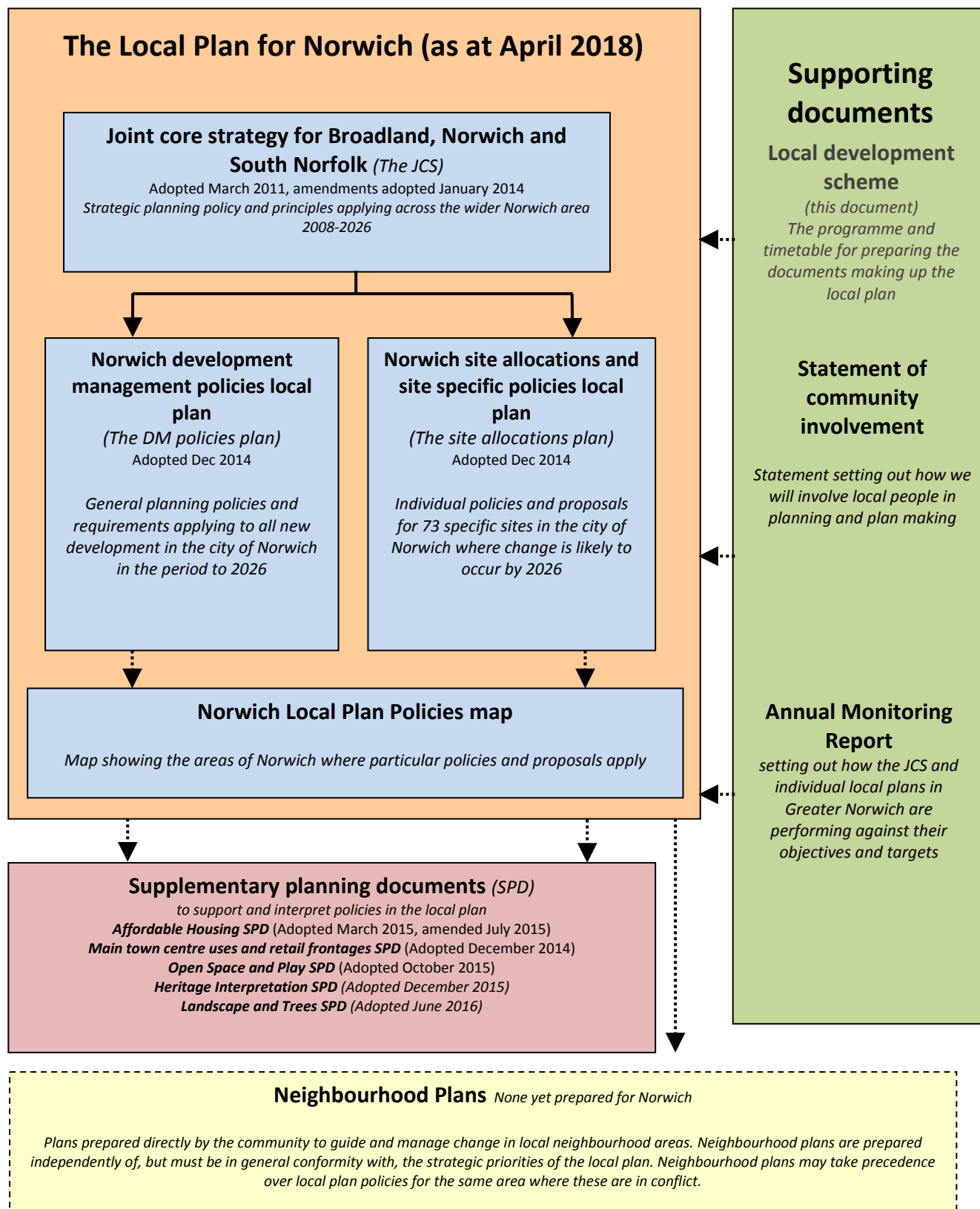
- a) **Non-statutory strategic guidance** including the *Norfolk Strategic Planning Framework* (NSPF);
- b) Other **potential and anticipated workstreams** arising from ongoing national and local policy changes. The scope and extent of the work that may be undertaken depends on resources available to the council and (in some cases) further clarification from central government about how proposed new planning measures would operate in practice. For that reason no detailed timescales can be specified for future informal local guidance and other work items in this category.

### 3. The existing local plan

- 3.1 A number of planning documents are already in place to guide the council's decisions on planning applications. Together these form the existing adopted local plan for Norwich, which has been through a formal process of consultation and independent examination before adoption.
- 3.2 As these documents are already in use, they are not part of the formal LDS schedule set out in Annex 1, which deals in the main with the new and emerging documents that will be prepared to replace or supplement them. However they are referred to below in order to provide a complete picture of the planning policy documents which apply in Norwich.
- 3.3 The documents making up the local plan must conform to national planning policy in the National Planning Policy Framework (NPPF), supported by national planning practice guidance (PPG). In preparing its local plan the council must show that it has met the statutory *Duty to Cooperate* with adjoining authorities and other relevant bodies.
- 3.4 The local plan documents fit into a hierarchy with broad strategic policies at the top and more detailed policies interpreting the strategic approach at a district and small area level. This is illustrated in Figure 1 on page 8.
- 3.5 For the Norwich area, the adopted ***Joint core strategy for Broadland, Norwich and South Norfolk*** (JCS) is the primary document at the top of the hierarchy to which other development plan documents prepared by individual districts should conform. The JCS was adopted in March 2011, with amendments adopted in January 2014. It is a strategic planning document prepared jointly by the three constituent districts in Greater Norwich and Norfolk County Council, and provides the long term vision, objectives and spatial strategy for development of Norwich and its surrounding area for the period to 2026. The JCS is therefore at the heart of the present local plan for Norwich.
- 3.6 The ***Site allocations and site specific policies local plan*** (the Site Allocations Plan) identifies and sets out policies for sites in Norwich city where development is proposed or expected to occur between now and 2026. It responds to the requirement of the JCS to identify additional sites for 3000 new homes in the city by 2026 over and above existing housing commitments. It also identifies opportunities to accommodate the overall levels of growth in jobs and services anticipated over that period and to ensure that these can be delivered and located sustainably, with a particular focus on expanding office employment and retail and leisure uses in the city centre. It will also help to deliver the community facilities and green infrastructure and elements of the sustainable transport network required to support new development as it occurs, in accordance with the JCS. The Site Allocations Plan was adopted in December 2014.
- 3.7 The ***Development management policies DPD*** (the DM Policies Plan) sets out a range of more detailed policies applying throughout Norwich which will be used in the council's assessment of development proposals and to guide future council decisions on applications for planning permission up to 2026. Its 33 policies cover a range of topics,

building on the national policy principles for sustainable development set out in the National Planning Policy Framework and the strategic policies and objectives of the JCS. In certain cases the policies also set out local criteria and standards for different kinds of development. The DM Policies Plan was also adopted in December 2014.

- 3.8 The Localism Act 2011 allows for community led ***neighbourhood plans*** to be brought forward to complement the adopted local plan, and this is reflected in Figure 1. As stated above (paragraph 1.12), a neighbourhood area has been designated for the northern city centre. However as yet no neighbourhood plans have yet been proposed within the city boundary although a number of neighbourhood plans are now formally in place (“made”) for the adjoining suburban parishes of Cringleford in South Norfolk, and Sprowston, Hellesdon and Old Catton in Broadland. The city council remains open to working in cooperation with community-led groups to produce neighbourhood plans where these help to promote beneficial development, regeneration or neighbourhood enhancement in accordance with the presumption in favour of sustainable development and the general principles set out in the NPPF.



## 4. Looking forward – the emerging local plan and the 2018-21 LDS programme

- 4.1 The Local development scheme was last reviewed in 2016. This revision of the Local development scheme outlines the programme of documents and associated workstreams that will contribute to the replacement and review of the local plan. These will include the statutory and non-statutory planning documents detailed below.

### New Development Plan Documents

- 4.2 The proposed **Greater Norwich Local Plan (GNLP)** will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present Joint Core Strategy (JCS). This will, similarly, set out a statement of strategic planning policy for the wider Norwich area but, unlike the JCS, will also include policies and proposals for individual sites. As such, the GNLP will also replace separate site allocations plans for individual districts. The timetable for the production of the GNLP shown in this LDS has been adjusted to reflect changes in the anticipated production timetable arising from further consultations in the Regulation 18 stage. It is the only formal development plan document in the current programme.

### Review of the non-statutory Norfolk Strategic Planning Framework

- 4.3 The **Norfolk Strategic Planning Framework (NSPF)** is a non-statutory strategic policy statement setting out broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. The NSPF was included as a work stream in the 2016 LDS and was approved by partner authorities in early 2018. The NSPF will be updated in 2018-19 to meet the new requirements of the revised National Planning Policy Framework (NPPF), particularly in relation to the requirements set out for the Statement of Common Ground. Thereafter it will be reviewed regularly as the duty to co-operate requires authorities to work together in an ongoing and meaningful way as the Statement of Common Ground must reflect the most up to date position in terms of joint working across the area.
- 4.4 Further information on the GNLP and NSPF is provided in the Key Document Profiles section at the end of the LDS which also includes the proposed production timetable for each document. The work programme set out in this LDS may be subject to review dependent on the extent of evidence likely to be required.

### New Supplementary Planning Documents and planning guidance

- 4.5 The 2015 Affordable Housing SPD will be reviewed in 2018 with anticipated adoption in early 2019. The review will seek to address viability considerations, taking account of changes in the revised National Planning Policy Framework (NPPF, July 2018) with a view to maximising the provision of affordable housing in the city.



- 4.6 A guidance note will be prepared in 2018/19 to guide applications for purpose built student accommodation (PBSA) in Norwich. There has been a significant increase in applications for PBSA in the past couple of years and the guidance will seek to guide the location and type of new purpose built accommodation in the city.
- 4.7 A development brief is being prepared for Prospect House to guide the redevelopment of this prominent city centre site. This site was not allocated in the Site Allocations Plan as it was not a development opportunity at that time. The document has been subject to public consultation and will be submitted to the Council's Planning Applications Committee for approval in October 2018. The brief will be a material planning consideration when decisions are made about any planning application that is subsequently submitted for the site.

#### Other committed and potential workstreams

- 4.8 The following paragraphs refer to committed and potential workstreams which are or may be part of the Council's work programme, although in many cases the status and timescales for production of these have yet to be confirmed. None are formal development plan documents or supplementary planning documents but are included in the LDS for completeness. Subsequent revisions to the Local development scheme would identify the need for any formal DPDs or SPD emerging from this work.

##### a) Committed

- 4.9 Additional workstreams which are **committed** and form part of the planning service's work programme during this LDS period are as follows:
- **Brownfield Land Register updates.** The Town and Country Planning (Brownfield Land Register) Regulations 2017 require local planning authorities to maintain a statutory Brownfield Land Register. The regulations state that the Part 1 Registers must be updated at least annually so this will form an ongoing commitment. Part 2 of the register is intended to include sites listed in Part 1 which are considered suitable for the granting of planning permission in principle for residential development. There is no intention at this stage to produce a Part 2 Register.
  - Maintenance of the **Self-Build Register** (set up in April 2016) will potentially involve identifying opportunities for self-build and custom built housing on sites in Norwich to match demand, whether already allocated for housing or not.
  - A commitment was made in the 2016 LDS to progress work on options for the city council's future policy approach to **Houses in Multiple Occupation (HMOs)**. Although progress has not been made to date, this work is programmed for late 2018 / early 2019, to be considered alongside the production of guidance on purpose built student accommodation referred to above.

## **b) Potential additional work**

- 4.10 Additional workstreams which may be progressed, but which are not firm commitments in this LDS period, are:
- Potential neighbourhood plan support following the designation of the northern city centre area as a neighbourhood area in June 2018. This will be dependent on a community group gaining designation as a neighbourhood forum, and commencing preparation of a neighbourhood plan.
  - There is an opportunity, following Unilever's announcement to close the Colman site, for the council to work closely with the landowners and other key stakeholders to maximise the regeneration and heritage potential of this major east Norwich site. This will require some form of planning policy, the scope and form of which has yet to be determined, and there may be potential to include adjacent landholdings within the scope of the guidance, for example the Deal Ground and Utilities sites.
- 4.11 Government is yet to publish its amendments to the **Community Infrastructure Levy** (CIL) regime. Depending on the timing any amendments, the current intention is that a local CIL review will be undertaken in parallel with the development of the Greater Norwich Local Plan (GNLP), so that a revised CIL is most likely to be introduced at around the same time as the adoption of the GNLP in late 2021.
- 4.12 The need for a potential **Gypsy and Traveller Single Issue Review** was identified in the 2014 LDS as a potential workstream. It is not anticipated that such a plan will now be necessary, as any residual provision on an identified site and any longer term provision elsewhere can be covered in the Greater Norwich Local Plan and/or by identification of appropriate sites on the Brownfield Land Register.

## 5. Key document profiles

Document Title	Greater Norwich Local Plan (GNLP)
Role and content	To provide the strategic vision, objectives and strategy for future development of the greater Norwich area, to accommodate objectively assessed needs for growth and to identify specific sites for development in the period to 2036. The GNLP provides the strategic context for the preparation of lower level policy documents prepared by the three constituent district planning authorities.
Status	Statutory Development Plan Document (DPD)
Conformity	The document must conform with the National Planning Policy Framework (the NPPF). It should also accord with standing advice in national Planning Practice Guidance (PPG).
Geographical coverage	The three districts of Broadland, Norwich and South Norfolk, excluding the parts of those districts falling within the Broads Authority area.
Joint working arrangements (if any)	The plan is being prepared by a joint team comprising officers from Norwich, Broadland and South Norfolk district councils with the support of Norfolk County Council. Each council will make independent decisions at key stages in the plan preparation process.
Relationship with adopted local plan(s)	The GNLP will supersede <ul style="list-style-type: none"> <li>a) the <b>Joint Core Strategy (JCS)</b> for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014)</li> <li>a) the <b>Norwich Site Allocations and Site Specific Policies Local Plan</b> (adopted December 2014)</li> </ul>
Production milestones	

Document Title	Greater Norwich Local Plan (GNLP)
<b>Commence document production</b> The work includes a “call for sites” (an invitation to put forward specific development sites for inclusion in the GNLP, held in May-July 2016); evidence studies; Regulation 18 stage consultation on issues and options and site proposals held January-March 2018; further Regulation 18 stage consultations on additional sites (October – December 2018), and on a draft plan to include suggested policy options, growth strategy and site allocations (see below). For further details of the timetable for this work see <a href="http://www.gnlp.org.uk">www.gnlp.org.uk</a> .	<b>December 2015</b>
Regulation 18 draft plan	September 2019
Publish pre-submission (Regulation 19) document	February 2020
Formal submission of GNLP to Secretary Of State (Regulation 22)	June 2020
Adoption of the Greater Norwich Local Plan	<b>September 2021</b>
<b>Monitoring and review</b>	Annual Monitoring report and five year housing land supply updates

The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. Such a review will need to determine whether any significant matters have arisen, for example changes to national policy or needs for development, that mean that modifications should be made to the local plan or a new replacement local plan produced. The need for a review of policies in the GNLP will be assessed in due course. As such there is currently no commitment to review the GNLP and therefore no reference to such a review in this LDS. However dependant on the outcome of a future assessment of the need to review GNLP policies, such a workstream may appear in a future iteration of the LDS.

<b>Document Title</b>	<b>Norfolk Strategic Planning Framework (NSPF) review</b>
<b>Role and content</b>	To set out an agreement between Norfolk's local planning authorities insofar as they relate to strategic planning matters, setting out broad strategic targets and priorities to inform and provide a context for the preparation of statutory local plans for individual districts and areas within the county (including the GNLP); to facilitate joint working across district boundaries and help to fulfil the Duty to Cooperate; and to meet the NSPF's requirements in relation to a Statement of Common Ground by regular review of the NSPF.
<b>Status</b>	Non statutory strategic document
<b>Geographical coverage</b>	The administrative county of Norfolk.
<b>Joint working arrangements (if any)</b>	<p>The NSPF review is being prepared jointly by the district planning authorities within Norfolk working with Norfolk County Council, the Broads Authority and with the involvement of the Greater Anglia Local Enterprise Partnership and other key stakeholders.</p> <p>Governance:</p> <p>The Duty to Cooperate member forum has been established as a non-decision making body which officers report to. Decisions are made by the constituent authorities' cabinets or equivalents.</p>
<b>Conformity</b>	As a non statutory document there is no formal requirement for conformity with higher level national policy statements, however the framework will need to follow the general principles of national policy and guidance.
<b>Relationship with adopted local plan(s)</b>	The NSPF provides a framework for the eventual formal review and replacement of existing local plans, and demonstrates how the Norfolk authorities are meeting the Duty to Cooperate.
<b>Production milestones (provisional)</b>  <b>Development of NSPF into a Draft Statement of Common Ground for consultation</b>	<b>January 2019</b>

<b>Endorsement of revised NSPF/SoCG</b>	<b>Summer 2019</b>
<b>Monitoring and Review</b>	It is anticipated that the NSPF will be reviewed every 2 years. The next review should potentially take place by summer 2021, within the lifetime of this LDS.

## ANNEX

LOCAL DEVELOPMENT SCHEME FOR NORWICH, 2018-21  
KEY DOCUMENT PROGRAMME

Document	2018												2019												2020												2021													
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D		
Preparation of Local Development Scheme																																																		
ADOPTED DEVELOPMENT PLAN DOCUMENTS IN USE																																																		
Joint Core Strategy for Broadland Norwich and South Norfolk																																																		
Norwich Site Allocations and Site Specific Policies Local Plan																																																		
Norwich Development Management Policies Local Plan																																																		
PROPOSED DEVELOPMENT PLAN DOCUMENTS																																																		
Greater Norwich Local Plan																																																		
PROPOSED NON STATUTORY DOCUMENTS																																																		
Norfolk Strategic Planning Framework/SOCG review																																																		
PROPOSED SUPPLEMENTARY PLANNING DOCUMENTS																																																		
Affordable Housing SPD review																																																		

## KEY

## General

LDS production/review

Resolution to bring LDS into effect

Commencement of this LDS period

Commencement of individual document production

## Adopted development plan documents

Adopted DPDs (local plans) in use

Adopted DPD (local plan) expiry. NB the JCS and Site Allocations plan expire in 2026 but will be superseded by the new GNLP upon its adoption in 2021.

## Greater Norwich Local Plan (GNLP)

## Previous Stages

Call for sites May-July 2016

Preparation of issues and options Regulation 18 document and supporting evidence March 2016 - 2018

Reg 18 consultation stage (issues and options/site proposals)

Focussed consultation on additional sites

Reg 18 draft consultation stage (preferred policy options, growth strategy and site allocations)

Assessment of responses/preparation of Reg 19 pre-submission plan and additional evidence

Reg 19 publication (pre-submission plan)

Assessment of responses/preparation of Reg 22 submission document

Formal Submission to Secretary of State (Regulation 22)

Examination in Public

Consultation on inspectors' proposed modifications

Publication of Inspectors Report

## Adoption

## Norfolk Strategic Planning Framework (NSPF) Review

Evidence gathering and production of draft framework

Consultation on draft framework

Production of final framework

Endorsement of NSPF by constituent Norfolk councils

Ongoing updates to Statement of Common Ground

## Supplementary Planning Documents (SPD)

SPD production

SPD Consultation - draft (Regulation 12)

SPD adoption





**Report to** Sustainable Development Panel  
19 September 2018  
**Report of** Head of Planning  
**Subject** Retail Monitor 2018

**Item**

**5**

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**Purpose**

To report the findings of the 2018 Norwich Retail Monitor.

The Retail 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**

To note the findings of the 2018 Retail Monitor.

**Corporate and service priorities**

The report helps to meet the corporate priority "A prosperous and vibrant city" and the service plan priority to implement the local plan for the city.

**Financial implications:** None directly

**Wards:** All wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

**Contact officer(s)**

Samuel Walker, planner 01603 212257

Judith Davison, planning policy team leader 01603 212529

**Background documents**

None

## Report

### Introduction

1. This report presents the findings of the 2018 Retail Monitor.
2. The Retail 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.
3. The monitor is based on a survey of the city's retail offer carried out in June 2018. This report updates members from the last monitor produced in June 2016.
4. The revised National Planning Policy Framework (NPPF) was published in July 2018 (NPPF 2018). It states in paragraph 85 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".
5. The NPPF also requires local plans to define a network and hierarchy of 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.
6. Policy 19 of the Joint Core Strategy (JCS – adopted 2011, with amendments adopted 2014) sets out the network and hierarchy of centres which will apply in greater Norwich, as follows:
  - Norwich City Centre, a regional centre serving a wide catchment and providing a wide range of interdependent activities including retailing, leisure, employment, culture, arts and tourism. JCS Policy 11 (Norwich City Centre) states that Norwich city centre's 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.
  - Large District Centres (LDCs) at Anglia Square/Magdalen Street/St. Augustine's and at Riverside. JCS Policy 19 promotes the strengthening of the large district centres.
  - District Centres such as Bowthorpe, Aylsham Road and Plumstead Road are groups of shops containing at least one supermarket or superstore and a range of non-retail services. JCS 19 also supports the essential role of district and local centres (below) in meeting everyday shopping needs.
  - Local Centres, such as Grove Road, provide a range of small shops of a local nature (for example a small supermarket, newsagent, pharmacy), serving a small catchment.
7. The Development management policies local plan adopted in December 2014 (the DM plan) provides the detail to enable the strategic aims above to be implemented and to protect the vitality and viability of centres. This is done through policies DM20 and DM 21 which apply specific thresholds for retail uses in each retail area of the city.

8. These policies are also supported by the Main town centre uses and retail frontages supplementary planning document which was adopted concurrently with the DM plan.
9. An updated retail study to assess Norwich's current retail needs was produced in December 2017 by GVA to inform the emerging Greater Norwich Local Plan (GNLP). This advocates continued support and growth of the comparison goods retail offering, commercial leisure and other 'main town centre uses' in Norwich City centre, including growth in retail floor area in the city.

### **Main findings of the 2018 Retail Monitor**

10. The Norwich City Centre Shopping Floorspace Monitor and Local and District Centres Monitor (June 2018) is attached as Appendix 1. It is widely reported that the retail sector faces challenging times, which is supported by increased vacancy rates since the last survey, however the picture varies considerably across the city as illustrated in the table below (which appears as Table 9 in the Retail Monitor).

#### **The direction of travel of vacancy rates and retail floorspace in Norwich since 2016**

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

11. Full details of the 2018 survey are set out in Appendix 1. Key findings include:

- Vacant floorspace in the city centre has continued to rise since the last survey; it is now at 7.3% from 2016's figure of 5.8%. Although vacant floorspace has been increasing since 2014, it remains at a lower level than at its height in 2010 (12.4%).
  - Conversely, the number of vacant units in the city centre has decreased slightly to 10.8% from 2016's figure of 11.3%; this also compares favourably to a national city centre average of 11.2% (Local Data Company, June 2018)
  - The percentage of vacant units in the primary area is 9.8%. This is a marked improvement from the 14% vacancy rate in the primary area in 2016.
  - Most of the primary area retail frontage zones are performing reasonably well in terms of their retail function with all of them being within their recommended minimum percentage rate of A1 retail, however six of the seven monitored frontages have seen a reduction in the proportion of shops in the retail frontage since 2016, whilst Castle Mall has remained constant. Castle Mall is, however, currently experiencing a high level of long term vacant A1 retail units (26%).
  - Retail vacancies have increased in the secondary retail areas since 2016. In terms of vacant floorspace this has been the most dramatic rise, from 2.8% in 2016 to 17.7% in 2018. This can be attributed to the closure of some large scale national retailers, most notably Toys R Us in Cathedral Retail Park which had a significant floor area for a single retailer.
  - In the large district centres, vacancy rates have increased slightly when taking account of units vacant and under refurbishment; however, if considered as a proportion of retail floor space excluding space being built or refitted, the vacancy rate has remained constant at 5.4% since 2016. This vacancy rate is low when compared with the situation at the start of the plan period in 2008;
  - In the rest of the city centre (streets outside the defined areas), vacant unit rates have risen steeply since 2016. Vacant floor space has decreased. This suggests that the larger units are faring well but that the smaller units are struggling to find and retain retailers. This pattern is in complete contrast to the situation in 2016; and
  - Vacancy rates in the ten existing district centres have increased on average to 11.7% from 9.6% in 2016. Vacancy rates in the 28 local centres have remained constant at 7.5% since 2016. Vacancy rates vary considerably within each of the district and local centres but overall the centres continue to be relatively robust and to offer an appropriate range of local services and facilities, with food stores being most important to their success.
12. The 2018 monitoring figures suggest that the retail performance across the city remains relatively robust and competitive; however, it is apparent that vacancy levels have continued to increase marginally in all areas either in floorspace or unit number terms, except for Local Centres which have, overall, enjoyed a decrease in vacant units at the same time as increasing the overall number of units.
13. Secondary retail areas in the City Centre have experienced the poorest performance with regards to A1 retail, with overall increased vacancy both in

floorspace and unit number terms, whilst also decreasing in size in terms of number of units and floorspace.

14. While the majority of changes identified do not appear to be especially significant year-on-year, there have been some significant rises in vacancy, most notably in Secondary Areas mentioned above. These changes will continue to be monitored closely to inform emerging policies and guidance. The city has seen a trend of rising vacancies and reduction of A1 floor-space and unit numbers. The 2016 report concluded that there were “*small but meaningful changes across the city*” and the 2018 survey shows a gradual continuation of this pattern. As noted in the 2018 Retail Monitor at Appendix 1 (paragraph 11) the retail industry has been undergoing “dramatic structural changes” in recent years partially driven by technology, which may have ongoing impacts for the viability of some retail businesses.
15. There is a trend of a condensing retail offering within the city centre, bringing the focus to the Primary Areas. There is also a recognisable trend of a move away from A1 retail uses to service and leisure type uses; this is a pattern seen nationally and is not peculiar to Norwich.
16. Over recent years, the government has made a substantial number of changes to permitted development rights, many of which affect A1 retail space. As such, smaller A1 retail units can change to other uses (such as professional and financial services, residential, leisure, restaurants and schools) on a permanent or temporary basis with either no planning permission or prior approval only. Monitoring of changes between 2016 and 2018 show no significant trends in such changes of use but it will be important to continue to assess the impact of such changes in future monitoring reports.
17. It is therefore important that the council investigates other possible ways to cultivate and support the retail offer of Norwich, potentially working in partnership with relevant organisations including Norwich BID.

## **APPENDIX 1**

### **NORWICH SHOPPING FLOORSPACE MONITOR 2018**