



## Briefing Note

Representation Ref: 8537, Matter 6A and 6D

Our ref 10334/PW/HC/SSa  
Date 14 October 2010  
To Mike Fox, Planning Inspector, C/O Louise St John Howe, Programme Officer  
From Capital Shopping Centres (Representation Ref: 8537)

### **Subject Greater Norwich Development Partnership Joint Core Strategy - Further Statement - Matter 6 Norwich City Centre (Policy 11)**

in  
Matter On behalf of our client Capital Shopping Centres plc (CSC), we previously submitted representations to the GNDP Joint Core Strategy Submission Draft December 2009. In response to the Inspector's matters and questions, please find below our further statement prepared on behalf of CSC in relation to 6A and 6D.

#### 1.0 **Matter 6A – Does the JCS provide clear, justified and effective core strategic guidance on the future planning of the City Centre, consistent with National Policy?**

1.1 CSC supports the aim of Policy 11 which seeks to enhance Norwich City Centre as a regional centre and welcomes the recognition that the City Centre will be the main focus in the sub-region for major retail, leisure and office development. In order to meet the effectiveness test set out in PPS12, the Core Strategy is required to be deliverable, flexible and able to be monitored. While CSC generally support the commitment to strengthening the city centre, CSC suggest clarification on the following points to meet the requirements of PPS12.

1.2 The supporting text to Policy 11 states that given the uncertainties around long term forecasting and the unpredictable impact of the 2009 recession a relatively cautious approach will be taken to comparison goods floorspace growth. The text identifies a need for around 20,000 sq m of comparison goods floorspace to 2016. We note that this figure within the City Centre Topic Paper (TP1, November 2009) is 30,000 sq m i.e. 10,000 sqm greater than that contained within the Submission Draft supporting text to Policy 11. The 20,000 sq m figure in the Core Strategy is still significantly less (depending on whether the Core Strategy is referring to gross or net?), than the comparison goods floorspace figure of 40,000 sq m net by 2016 used within the Retail and Town Centre Study (October 2007).

1.3 It uncertain as to whether this 20,000 sq m refers to gross or net additional floorspace in both the Submission Draft Core Strategy and the City Centre Topic Paper. Based on the RTCS 2007 we believe the figure should be net

rather than gross. In order to meet the effectiveness test in PPS12, CSC seeks clarification on the quantitative figure, and the net/gross floorspace, within the Core Strategy so that the floorspace capacity to 2016 is clear, deliverable and able to be monitored in accordance with PPS12.

- 1.4 The Norwich Sub Region: Retail and Town Centres Study, published in October 2007, is used as the evidence base for the Core Strategy. Our previous representations to the Submission Draft (December 2009) highlighted that the 2007 study was out of date and was prepared pre the affects of the recession. Almost one year on from our previous representation, we emphasise that the Retail Study is now out of date and suggest that the Study should be reviewed and updated shortly after adoption of the Core Strategy (early 2011) to reassess the quantitative need for new retail development in the City Centre for the plan period (up to 2026 – not 2021 as predicted in the 2007 study) as set out in PPS4 (para EC1.2b).
- 1.5 The Plan identifies the need for “regular monitoring and refreshed analysis” and CSC consider the assessment of quantitative need for new retail development in the city centre should be “refreshed” forthwith, and at regular intervals after adoption of the Core Strategy. Consequently the findings of the 2007 study can not be relied upon in formulating the supporting text to Policy 11, given the Core strategy would not be founded on a robust and credible evidence base and would therefore be ‘unsound’, in accordance with PPS12.
- 2.0 **Matter 6D – If the JCS is unsound in relation to the City Centre and/or Urban Parishes, are there any specific changes that would render it sound?**
- 2.1 CSC suggest the following change be made to the Policy 11 supporting text in order for it to be effective and sound, in line with PPS12.
- 2.2 *“...Given the uncertainties around long term forecasting and the unpredictable impact of the 2009 recession a relatively cautious approach will be taken to comparison goods floorspace growth. Consequently, opportunities will be sought for **20,000 sq m net as a minimum** of comparison goods floorspace to 2016....*
- 2.3 *...Retail need will be subject to regular monitoring and refreshed analysis **every 4-5 years** to ascertain whether further new floorspace is required **up to 2026**”*
- 2.4 CSC consider the supporting text should reflect the updated retail capacity figures following an update of the RTCS in 2011. CSC welcome the opportunity, as a key stakeholder, to be involved in the Core Strategy and seek continual involvement in its development. CSC considers the above comments make a positive contribution to delivering a sound, concise and robust Core Strategy in accordance with PPS12.

