



## **Sustainable development panel**

**Date:** Tuesday, 16 November 2021

**Time:** 16:00

**Venue:** Remote access and live streaming

### **Committee members:**

#### **Councillors:**

Stonard (chair)  
Giles (vice chair)  
Carlo  
Davis  
Everett  
Grahame  
Lubbock  
Maxwell  
Oliver

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## Agenda

### Page nos

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 14 September 2021 and, subject to availability, the minutes of the meeting held on 9 November 2021

4 **Local Development Scheme November 2021**

9 - 38

**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 two-year period to 2023.

5 **2021 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor**

39 - 96

**Purpose** - To report and discuss the findings of the 2021 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.

6	<b>Article 4 Direction to Remove Permitted Development Rights for the Conversion of Offices to Residential</b>	97 - 108
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**Purpose** - To update members on the introduction of an article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre and to feedback on the recent consultation.

Date of publication: **Tuesday, 09 November 2021**





**Sustainable Development Panel**

**16:00 to 17:40**

**14 September 2021**

Present: Councillors Stonard (chair), Giles (vice chair), Carlo, Davis, Everett, Grahame, Hampton (substitute for Councillor Maxwell), Lubbock and Oliver

Apologies: Councillor Maxwell

**1. Declarations of interest**

There were none.

**2. Minutes**

**RESOLVED** to approve the accuracy of the minutes of the meeting held on 22 June 2021, subject to item 3, Declarations of Interest deleting “Anguish Educational Foundation” and the brackets because Norwich Consolidated Charities is sufficient.

**3. East Norwich Masterplan Progress Update Report**

(Martyn Saunders (director of planning and regeneration, Avison Young) (the lead consultant) and Anthony Benson (Allies and Morrison) attended the meeting for this item. Tracey Coleman, East Norwich project manager, was also in attendance.)

The planning policy team leader presented the covering report which provided an introduction to the emerging masterplan and the consultants’ progress report appended to the report at Appendix A. Members were advised that a more detailed report of engagement to date was available on the council’s website<sup>1</sup>.

Martyn Saunders and Anthony Benson gave a power point presentation on the East Norwich Masterplan. (A copy of the presentation is available on the council’s website.)

During discussion the consultants, together with the planning policy team leader, answered members’ questions on the emerging masterplan and engagement.

Members were advised that there had been a good spectrum of people attending the public engagement events, and that metrics (such as age, sex, ethnicity, post codes) had been collected. Consideration had been made to arranging events on site, outside school holidays and weekends to ensure engagement from a wide profile of

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<sup>1</sup> [www.norwich.gov.uk/ENMasterplanEngagementStage1](http://www.norwich.gov.uk/ENMasterplanEngagementStage1)

people. Members considered that Carrow Abbey was an attractive venue but it required a journey to attend and there was concern that the residents of Bracondale could be overrepresented. It was important that potential residents from areas of deprivation were represented. It was suggested that the next round of consultation in October could include venues in Lakenham and Thorpe Hamlet. The consultants offered to talk to the officers about alternative venues. Members noted that continuity was an advantage and that the arrangements had been made to hold the next session at the Abbey but considered that there were community centres that could be suitable venues as well and that the objective was to engage as many people as possible. Members also considered that public engagement should target the residents of Trowse and the primary schools in Lakenham and Trowse, which would be affected by the impact of the East Norwich development. The panel considered that there needed to be a balance so that “everyone had a voice” and supported the development.

A member said that she was concerned that connectivity between the sites and new highways access to the site would put additional pressure on the existing road network, specifically Yarmouth Road and Thorpe Road. Members were advised that the consultants were looking at all options and evidence of congestion would be taken into account, for instance at Carrow Bridge and the inner ring road. The masterplan for the site could not solve transport issues for the city as a whole and would make the best use of existing infrastructure and provide it where needed. The chair pointed out that the project board was working in partnership with the county council and that other highways schemes could be brought forward separately. A member referred to the emerging principles of the masterplan and said that there needed to be good rail and bus services to the site to minimise the need for new roads to be created and commented on the noise generated by traffic on the bypass which would be unpleasant for future residents. Members were advised that the masterplan would indicate the delivery of housing and employment for families but would not be dependent on massive infrastructure investment. Instead, the emphasis would be on efficiency and having the most appropriate infrastructure to connect the sites up and to link into the wider highway network.

A member asked whether improvement works to Trowse rail bridge would be part of the masterplan. The consultants noted that Network Rail is a member of the East Norwich Partnership and that its consideration of the proposed improvements is running parallel with the masterplan process. The consultants’ emphasis was on drafting the masterplan so it does not preclude the final Network Rail decision on twin tracking. In response to a member’s question about the potential for using the old Trowse station as a rail stop, the consultants noted that conversations were underway, but that it was unlikely that trains would stop there because of the proximity to Norwich station. The improvement works to the underpass at Carrow works and extension of the riverside walk would provide connections for cyclists and pedestrians across the site.

In reply to a members’ question on flood risk, the consultant explained that the Environment Agency would be consulted on concerns that sea levels were rising faster than predicted because of climate change.

**RESOLVED to:**

- (1) thank Martyn Saunders and Anthony Benson for the presentation;

- (2) note that the draft East Norwich supplementary planning document will be considered at cabinet on 10 November and that a meeting of the panel will be convened to provide members with an opportunity to comment.

#### **4. 2019-20 Annual Monitoring Report**

The planner presented the Annual Monitoring report (AMR) which monitors the objectives of the Joint Core Strategy for the period 1 April 2019 to 31 March 2020, and had been delayed in part due to the submission of the Greater Norwich Local Plan.

The chair thanked the planner for the excellent covering report. He pointed out for clarity that paragraph 1.8 of the AMR referred to the city council's support of the Northern Distributor Road (NDR) during the period 2019 to 2020 and did not reflect the council's current position.

During discussion members considered that planning policy for affordable housing needed to be robust and that viability assessments and methodology needed to be open and transparent. It was noted that there needed to be wider discussions to bring forward more affordable housing both within the council between housing officers and planners and with our neighbouring district councils (Broadland and South Norfolk).

In reply to a members' comment, the chair said that the city council's representatives took every opportunity to promote sustainable development, transport and energy efficiency measures at meetings of the Greater Norwich Growth Board and the Greater Norwich Development Partnership. Members also noted that planned development in partnership with the neighbouring authorities, through the Joint Core Strategy (JCS) and the emerging Greater Norwich Local Plan (GNLP) sought to prevent urban sprawl and provide new housing in socially cohesive communities.

Discussion ensued on the monitoring of data and trends. Members noted that the new policies under the GNLP would be used to monitor waste and recycling more efficiently. Panel members noted that the impact of the pandemic would also affect trends and indicators going forward. It was also noted that some of the large sites in the emerging GNLP would affect the balance of housing distribution, including rural clusters.

A member referred to the statistics of people who were killed or seriously injured in road traffic accidents and suggested this was less than rural areas because of the introduction of 20mph speed limits in residential areas of the city. There was a tendency outside urban areas for cars to drive faster and overtake other vehicles, increasing the risk of serious accidents.

The panel noted that data for 2019-20 missing in Table 3.17 (To encourage the development of healthy and active lifestyles) on page 30 of the AMR, could be due to government data not being available or being discontinued. However, members considered that some of this data was widely available and asked that this could be taken up with the Greater Norwich Development Partnership team.

**RESOLVED** to note the contents of the 2019-20 GNDP Annual Monitoring Report.

CHAIR



**Committee Name: Sustainable development panel**

**Committee Date: 16/11/2021**

**Report Title: Local Development Scheme November 2021**

**Portfolio:** Councillor Stonard, Cabinet member for inclusive and sustainable growth

**Report from:** Head of planning and regulatory services

**Wards:** All Wards

**OPEN PUBLIC ITEM**

**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 two-year period to 2023.

**Recommendation**

To 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)

**Policy Framework**

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets the people living well, great neighbourhoods, housing and environment and inclusive economy corporate priorities.

This report addresses the following strategic actions in the Corporate Plan:

- Provide means for people to lead healthy, connected, fulfilling lives, particularly those who are most vulnerable
- Maintain a clean and sustainable city with a good local environment that people value
- Ensure our services mitigate against any adverse effects of climate change and are efficient to reduce carbon emissions

- Build and maintain a range of affordable and social housing
- Continue sensitive regeneration of the city that retains its unique character and meets local needs
- Mobilise activity and investment that promotes a growing, diverse, innovative and resilient economy.

This report helps to meet the following objectives of the COVID-19 Recovery Plan:

- Housing, regeneration and development
- Climate change and the green economy

## **Report Details**

1. The Local Development Scheme (LDS) must be prepared as part of the statutory process of plan making. It is 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 LDS 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 LDS was last reviewed in February 2021 and was intended to cover the period to 2023. Since then, further information has become available surround the East Norwich masterplanning exercise, progress on the Greater Norwich Local Plan (GNLP), as well as potential neighbourhood planning and design code workstreams. The LDS has therefore been revised to include the most up to date information. Otherwise, the information contained within it is identical to the February 2021 version.
5. The revised LDS will run to Autumn/Winter 2023 and will entirely supersede the version published in February 2021. It will be rolled forward periodically to ensure that it is as up-to-date and flexible as possible.

## **Updates to the Local Development Scheme**

6. The following summarises the changes made to the previous version of the LDS from February 2021:
  - (a) No further information is available regarding the Government's consultation on the Planning White Paper and Changes to the Current Planning System documents. This has impacted on the timescales for the review and production of several development plan documents, advice and guidance, details of which are set out below.
  - (b) The previous version of the LDS outlined that the Statement of Community Involvement would be reviewed during 2021. The intention is for the SCI to still be reviewed over the coming months, however the wording has been amended slightly to build some flexibility into the timescales to take account of current workload.

- (c) Since the last version of the LDS was adopted a community group has expressed an interest in establishing a neighbourhood forum for the Neighbourhood Area which was designated in 2018. As yet, no formal application has been made to the City Council but this is likely to happen during the lifetime of this LDS.
- (d) The revised version of the LDS has been updated to refer to the latest Greater Norwich Annual Monitoring Report.
- (e) Paragraphs 4.3-4.4 have been amended to refer to the progress and updated timescales associated with the Greater Norwich Local Plan (GNLP). The GNLP was submitted to the Planning Inspectorate in July 2021 in accordance with the accelerated timescales outlined in paragraph 4.4 of the LDS. It is anticipated that public examination of the GNLP will commence in early 2022 with adoption of the plan expected by September 2022.
- (f) The February 2021 LDS outlined that full review of the Development Management Policies Local Plan was not appropriate at that time given the uncertainty around the changes to the planning system. There have been no formal updates from the Government as to the extent of the changes that will be implemented. The intention is to consider commencement of a review of the DM Policies Plan next year when there is greater clarity on the proposed planning reforms and the on the content of the GNLP.
- (g) The LDS has been updated to refer to the latest revision of the Norfolk Strategic Planning Framework (NSPF) document which was endorsed and adopted by the Norfolk Planning Authorities in early 2021.
- (h) An update has been included on the progress of the East Norwich masterplan. Work has been ongoing throughout 2021 for the stage 1 masterplan including consultation and engagement events. The stage 1 masterplan will be presented to Cabinet for adoption in November 2021 and agreement to move to stage 2. Stage 2 will involve the production of a masterplan to support the policy and allocations in the GNLP.
- (i) The February 2021 LDS included reference to the production of a Norfolk-wide Local Housing Needs Assessment (LHNA) to be led by Norwich City Council. The production of the LHNA on a Norfolk-wide scale has not continued as a Greater Norwich LHNA was produced as evidence to support the GNLP.
- (j) The LDS has been updated to include details of progress made on the production of an Article 4 Direction to remove permitted development rights for the conversion of offices to residential. The direction and notice have been submitted to the Secretary of State for consideration. Should the process proceed as envisaged, the direction should be confirmed in December 2021 and will come into force in July 2022.
- (k) Following recent retail monitoring, it is intended to undertake more frequent monitoring of the city centre to ensure the council have regular

information on the city's retail sector. This is likely to require existing resource from the Planning team. This additional monitoring will be used to inform future review of the DM Policies Plan as per paragraph 6(f) above.

## **Conclusions**

7. The principal challenges to meeting the aims and timescales set out in the revised LDS remain the uncertainty around changes to national policy, availability of resources (both staff and financial), timescales surrounding local plan production process including the GNLP and a potential Neighbourhood Plan, and the continued joint working with other authorities across Norfolk.
8. In addition, many other aspects of the planning policy team's workload 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 LDS period, which may impact upon achievement of LDS timescales.
9. Information about the workstreams 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.

## **Consultation**

10. The LDS is prepared with input from both the planning policy and development management teams, as well as the GNLP and NSPF partners on workstreams that involve joint working.
11. In addition, the relevant portfolio holder was made aware of the contents and updates to the LDS prior to this report being completed.

## **Implications**

### **Financial and Resources**

12. The information contained within the updated LDS is the Planning Policy team's planned workload based on the information available at the current time and have already taken into account both financial and resource implications as part of the planning exercise. Any workloads that have financial or resource implications over and above the general planning policy resource requirements will be subject to review within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.

## **Legal**

13. This is a report for information. There are no legal implications arising from this report.

## Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	This information report does not have any direct implications for the council's equality and diversity considerations.
Health, Social and Economic Impact	This information report does not have any direct implications for the council's health, social and economic impacts considerations.
Crime and Disorder	This information report does not have any direct implications for the council's crime and disorder considerations.
Children and Adults Safeguarding	This information report does not have any direct implications for the council's children and adults safeguarding considerations.
Environmental Impact	This information report does not have any direct implications for the council's environmental impact considerations.

## Risk Management

Risk	Consequence	Controls Required
Government makes significant changes to the planning system	Many of the workstreams identified in the LDS may not be required any longer and risks undertaking abortive work; new workstreams may be required which will have an impact on timescales and resources	The LDS already highlights areas of work which may be at risk from Government changes to the planning system. The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.
Timescales for planned workload are brought forward/slip	This may impact on the resources required to ensure the workstreams continue/are completed.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.

<b>Risk</b>	<b>Consequence</b>	<b>Controls Required</b>
Unknown additional workstreams not currently planned for	This may impact on timescales and resources available for planned-for workstreams.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.
Changes to available resources	This may impact on timescales for planned-for and unknown additional work streams.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.

### **Other Options Considered**

14. 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, therefore no other options have been considered.

### **Reasons for the decision/recommendation**

15. The recommendation is to agree the Local Development Scheme and recommend that Cabinet approves it for publication to ensure that the Council complies with the requirement of section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by section 111 of the Localism Act 2011).

**Background papers: None**

### **Appendices:**

Local Development Scheme November 2021

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**NORWICH**  
City Council

**Appendix**

# **Local Development Scheme for Norwich**

**November 2021**

# 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. An LDS is a project plan which identifies 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 LDS 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, 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 form part of the LDS.
- 1.4 The LDS was last updated in February 2021. Since the publication of that document, further information has become available surrounding the East Norwich masterplanning exercise, progress on the Greater Norwich Local Plan, as well as potential neighbourhood planning and design code workstreams.
- 1.5 In autumn 2020, the Government consulted on the Planning White Paper: Planning for the Future<sup>1</sup> and Changes to the Current Planning System<sup>2</sup>. These documents propose significant changes to the way the planning system operates as well as the content of local plan documents. The Government is yet to respond to the consultation or make the arrangements formal in any new legislation. However, the Government has also signalled that it is carrying out a review of its proposed planning reforms, and therefore the situation going forward is still uncertain. Therefore, this revision of the LDS, and all the workstreams contained within it, assume a continuation of the current system. Should any changes to the planning system be formalised in future, a further update of the LDS will be prepared as necessary.

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<sup>1</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

<sup>2</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

## Summary of progress since the last LDS

- 1.6 Since publication of the last LDS, significant progress has been made on the preparation of the **Greater Norwich Local Plan** (GNLP), and on the revised **Norfolk Strategic Planning Framework** (NSPF), which was endorsed in early 2021. Further details are set out in the main body of this document.
- 1.7 The **Statement of Community Involvement** (SCI) was fully 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. A minor temporary update was made to the SCI in 2020 to increase flexibility in planning consultations as a result of the COVID-19 pandemic. The latest version of the SCI remains in place But is likely to require review over the coming months.
- 1.8 The **Brownfield Register** (Part 1) was last published in November 2020. 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 in accordance with Regulation 17 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.
- 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 Norwich Society. 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. The River Wensum Strategy Partnership group continue to meet and have progressed to the delivery phase of the project, setting out actions for implementation of the strategy. A number of projects identified in the strategy are underway, or have already been completed, such as the installation of canoe portages, an eel pass at New Mills, and Barn Road Gateway public realm and accessibility improvements. The partnership are now working on a Delivery Plan to focus project delivery for the next approximately two years.
- 1.11 In June 2018, the city council's Cabinet formally designated the area that 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 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. Since the last version of the LDS was published, a community group has expressed an interest in establishing a neighbourhood forum for this area. As yet, no formal applications have been made to the City Council, but this is likely to happen during the lifetime of this revised LDS.
- 1.13 The **Affordable Housing SPD** was updated and adopted in July 2019. This SPD replaces the previously adopted version from 2015. The new SPD takes account of changes in the revised NPPF with a view to maximising the provision of affordable housing in the city.
- 1.14 In November 2019, the **Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note** was adopted by cabinet. Following a significant rise in the number of applications for Purpose Built Student Accommodation (PBSA) over a number of years, the PBSA advice note was prepared to provide guidance for applicants and decision-makers in the absence of a specific policy in the Local Plan. The council has produced the advice note with the aim of ensuring delivery of high quality PBSA in Norwich. This includes an assessment of the need for purpose-built accommodation and guidance on a range of issues including the location, scale, external and internal design and management of PBSA, and how to encourage an accommodation mix for a wide range of students. The Council is continuing to work with local higher education institutions and their student's unions through PBSA working groups, to monitor and share information to support the provision of good quality and appropriate student accommodation. An update to the PBSA advice note to reflect current need is anticipated in 2022.
- 1.15 A development brief was prepared for Prospect House to guide the redevelopment of this prominent city centre site and was approved by Planning Applications Committee in October 2018. This site was not allocated in the Site Allocations Plan as it was not a development opportunity at that time. The brief will be a material planning consideration in the determination of any planning application that is subsequently submitted for the site.
- 1.16 UEA are looking at a new **Estates Strategy or Campus Redevelopment Programme** to set in place an overarching strategic framework to guide campus activities for the next 40 to 50 years and to be used as part of the evidence base of the GNLP. Findings will be discussed with Norwich City Council.

## 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 be either 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** (NCCAAP) 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 and Site Allocations plan will be replaced by the emerging Greater Norwich Local Plan (GNLP), which will run until 2038 and is scheduled to be adopted in 2022.
- 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. 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 DPDs 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 (SPDs)

- 2.7 Supplementary planning documents (SPDs) help to support and explain in more detail how the city council will implement particular policies and proposals in the Local Plan. SPDs 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 SPDs 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** (PPG) states that SPDs 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. SPDs 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 five adopted SPDs in place, which support the policies in the JCS and DM Policies Plan. Other planning guidance may 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 LDS, 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 2019 to March 2020, was published in July 2021<sup>3</sup>.

### **Associated documents and initiatives**

- 2.14 Although not required to be published as part of the LDS 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.

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<sup>3</sup> <https://www.greaternorwichgrowth.org.uk/planning/monitoring/>

### 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. These documents include the **JCS**, the **DM Policies Plan** and the **Site Allocations Plan**.
- 3.2 As these documents are already in use, they are not part of the formal LDS schedule set out in the Annex, 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 that 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. The Duty to Cooperate places a legal duty on local planning authorities and county councils in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 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 10.
- 3.5 For the Norwich area, the adopted **JCS** is the primary document at the top of the hierarchy with 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 until it is superseded by the Greater Norwich Local Plan once adopted (see section 4 below).
- 3.6 The **Site Allocation 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 **DM Policies Plan** sets out a range of more detailed policies applying throughout Norwich to 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 NPPF 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 1.10), a neighbourhood area has been designated for the northern city centre. However, 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.

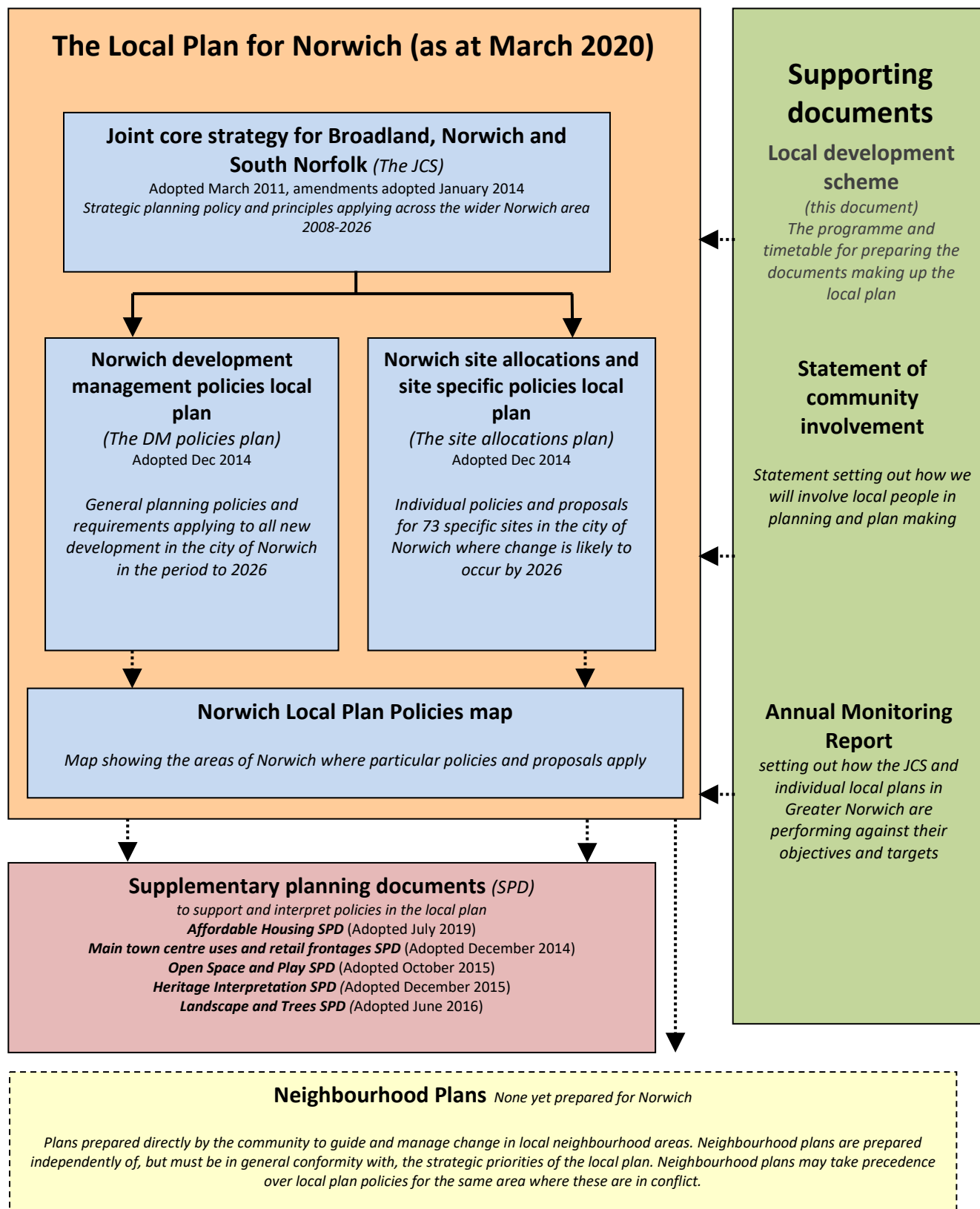


Figure 1: Hierarchy of the local policy context in Norwich

## 4. Looking forward – the emerging local plan and the 2021-23 LDS programme

- 4.1 The LDS was last reviewed in full in February 2021. This further review is required to make updates to local plan preparation timescales and to provide updates on the progress of workstreams since the last revision. This revision of the LDS 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.
- 4.2 Further detailed information on the GNLP is included in the Key Document Profiles in section 5. The work programme set out for this document may be subject to review dependent on the extent of evidence and resources likely to be required and timescales proposed by the Planning Inspectorate.

### New Development Plan Documents

- 4.3 The proposed **Greater Norwich Local Plan**<sup>4</sup> (GNLP) will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present 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 – in the case of Norwich, the Site Allocations plan. However, the village clusters site allocations policies for the South Norfolk District will be included in a separate South Norfolk Village Clusters local plan which is being prepared alongside the GNLP. Only the overall number of dwellings proposed within these settlements is included within the GNLP itself.
- 4.4 The timetable for the production of the GNLP shown in this LDS has been adjusted to reflect changes in the production timetable and to account for progress over the last 9 months. In July 2020 the Greater Norwich authorities agreed to extend the timescales for GNLP preparation to allow more time to make updates and amendments following the Regulation 18 consultation, to take on board updated evidence, to allow for an additional Regulation 18(d) consultation and to take account of the impacts of COVID-19. In August 2020, the Government published the Planning White Paper and Changes to the Current Planning System documents, which included a revision to the standard methodology for calculating housing need. Following consideration of options by the GNLP Board, the decision was taken to accelerate plan production making use of the transitional arrangements provided by the Government, based on the draft GNLP already consulted upon. In December 2020, the Government announced that the existing standard methodology would be retained meaning that the GNLP would no longer need to proceed through transitional arrangements. However, the Greater Norwich authorities agreed to proceed to the accelerated timescales in order to avoid any further delay in the plan's production and to ensure that plan-making momentum was maintained. In July 2021, the

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<sup>4</sup> <https://gnlp.oc2.uk/>

GNLP was formally submitted to the Planning Inspectorate for examination. Examination is anticipated to begin in early 2022.

- 4.5 In accordance with paragraph 33 of the NPPF and S10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, the council undertook a review of the DM Policies Plan and the Site Allocations Plan<sup>5</sup>, to review whether the plans are up to date and respond to changing local needs and circumstances. The review was carried out in October-November 2019 and endorsed by cabinet on 13 November 2019. It concluded that, in general, the local plan policies are fit for purpose at the current time, however it recommends that a full review of the DM Policies Plan should commence following the Regulation 19 consultation of the GNLP. The Regulation 19 consultation of the GNLP took place in early 2021 and therefore the review of the DM policies plan could, in theory, commence.
- 4.6 However, the Government have yet to publish their response to the consultation on the Planning White Paper and Changes to the Current Planning System which was due earlier this year. Therefore, there is still a significant degree of uncertainty surrounding what planning reforms may be implemented which could impact upon any future review of the DM Policies Local Plan. The intention is to consider commencement of a review of the DM Policies Plan next year when there is greater clarity on the proposed planning reforms and the on the content of the GNLP. Once this is clarified, the LDS will be updated to include the programme of work.

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

- 4.7 The **Norfolk Strategic Planning Framework**<sup>6</sup> (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 revised and endorsed by Norwich City Council in April 2021. It will continue to 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.

### **New Supplementary Planning Documents and planning guidance**

- 4.8 Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners are about to commission a masterplan for the East Norwich Strategic Regeneration Area, capable of adoption as a Supplementary Planning Document. This will aim to guide the coordinated redevelopment of the site to focus on delivery of transformational change of this key area of Norwich and to inform the Regulation 19 version of the GNLP. Consultants began work on the masterplanning

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<sup>5</sup> [https://www.norwich.gov.uk/info/20199/adopted\\_local\\_plan/2494/regulation\\_10a\\_review\\_of\\_the\\_local\\_plan](https://www.norwich.gov.uk/info/20199/adopted_local_plan/2494/regulation_10a_review_of_the_local_plan)

<sup>6</sup> [https://www.norwich.gov.uk/info/20022/planning\\_policy/1194/emerging\\_local\\_plan\\_and\\_evidence\\_documents/2](https://www.norwich.gov.uk/info/20022/planning_policy/1194/emerging_local_plan_and_evidence_documents/2)

exercise in March 2021 and are nearing the end of stage 1 of the process – a preferred option masterplan, based on a comprehensive evidence base and a process of public and stakeholder engagement. Cabinet will consider approval of the stage 1 masterplan in November 2021 and agreement to move to stage 2 of the masterplan. Stage 2 will involve production of a joint SPD for East Norwich to support the policy and allocations in the GNLP. Timescales are set out in the table in Section 5.

- 4.9 The previous version of the LDS includes a new committed workstream which involved the City Council being the lead authority on a new Local Housing Needs Assessment (LHNA) with partner authorities across Norfolk. This workstream has not progressed as envisaged as a LHNA has now been produced as evidence to support the GNLP. The Greater Norwich HNA was published June 2021<sup>7</sup>.

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

- 4.10 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 LDS would identify the need for any formal DPDs or SPDs emerging from this work.

#### Committed

- 4.11 Additional workstreams which are **committed** and form part of the planning service's work programme during this LDS period are as follows:
- Maintenance of the **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.
  - The **Self-Build Register** (set up in April 2016) will continue to be maintained in accordance with the Self-build and Custom Housebuilding Act 2015<sup>8</sup> (as amended by the Housing and Planning Act 2016).

#### Potential Additional Work

- 4.12 Additional workstreams which may be progressed, but which **are not firm commitments** in this LDS period, are:

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<sup>7</sup> <https://www.gnlp.org.uk/sites/gnlp/files/2021-07/B22.3%20Greater%20Norwich%20LHNA.pdf>

<sup>8</sup> <http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

- 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. A community group have expressed an interest in taking this forward and it is currently anticipated that an application for a Forum will be submitted before the end of 2021.
- Over the past few years, Norwich has seen a significant reduction in office floorspace. This is largely attributed to the ability to convert offices to residential accommodation under the prior approval process, and without planning permission. The reduction in office floorspace is concerning as it results in less choice of suitable accommodation for businesses and compromises the ability of the city, and the surrounding areas, to thrive economically. In addition, there is no provision within the prior approval process to secure affordable housing on these schemes. In July 2021, Cabinet agreed to delegate authority to officers to make an Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich City Centre. Following this, a copy of the direction and notice has been submitted to the Secretary of State (SoS) for consideration. Should the process proceed as envisaged, the direction should be confirmed in December 2021 and will come into force in July 2022.
- **The Environment Bill**<sup>9</sup> is due to undergo further scrutiny in Parliament. The current version of the Bill sets out plans and policies for improving the natural environment including waste and resource efficiency, air quality, water quality, nature and biodiversity, the regulation of chemicals etc. It is likely that the Bill will have a number of implications upon the planning system, for example, the formal introduction of Biodiversity Net Gain. Depending upon the final content of the Bill and the timescale for its implementation, the existing local plan documents will likely need to be updated to ensure compliance with the Bill. Currently, no further information is available on the timescales for the introduction of the Bill, however, the formal review of the DM Policies Plan would represent an opportunity to consider the implications of the Bill on the local planning context in Norwich. It may also be necessary to consider the implications of the Bill in context of any future changes to the planning system.
- In 2019, the Government published the first two parts of the **National Design Guide**<sup>10</sup>. This document sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms one part of Government guidance aiming to achieve enduring and successful places and forms a material consideration in the determination of planning applications. The third part of the design guide includes the provision of a National Model Design Code (anticipated in 2020), which will set a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing local design codes

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<sup>9</sup> <https://services.parliament.uk/bills/2019-20/environment.html>

<sup>10</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/843468/National\\_Design\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf)

and guides, and when determining planning applications. Following the publication of part 3 of the design guide, the council may consider the preparation of a local design guide, as part of the review of the existing DM Policies Plan and preparation of a new Plan. This will be dependent upon timescales and availability of resources, as well as an assessment of in-house expertise. In the absence of a local design guide, the council will be expected to defer to the National Design Guide.

- Following recent retail monitoring, it is intended to undertake more frequent monitoring of the City Centre to ensure the Council have regular information on the City's retail sector. This is likely to require existing resource from the Planning team. This additional monitoring will be used to inform future review of the DM Policies Plan.

## 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 2038. 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. This will exclude site allocations in village clusters in South Norfolk.
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		
Commence document production		December 2015
The work includes a “call for sites” (an invitation to put forward specific		

Document Title	Greater Norwich Local Plan (GNLP)
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>Regulation 18 draft plan</b>	January – March 2020
<b>Publish pre-submission (Regulation 19) document</b>	February – March 2021
<b>Formal submission of GNLP to Secretary Of State (Regulation 22)</b>	July 2021
<b>Adoption of the Greater Norwich Local Plan</b>	September 2022
<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 following on from its adoption.

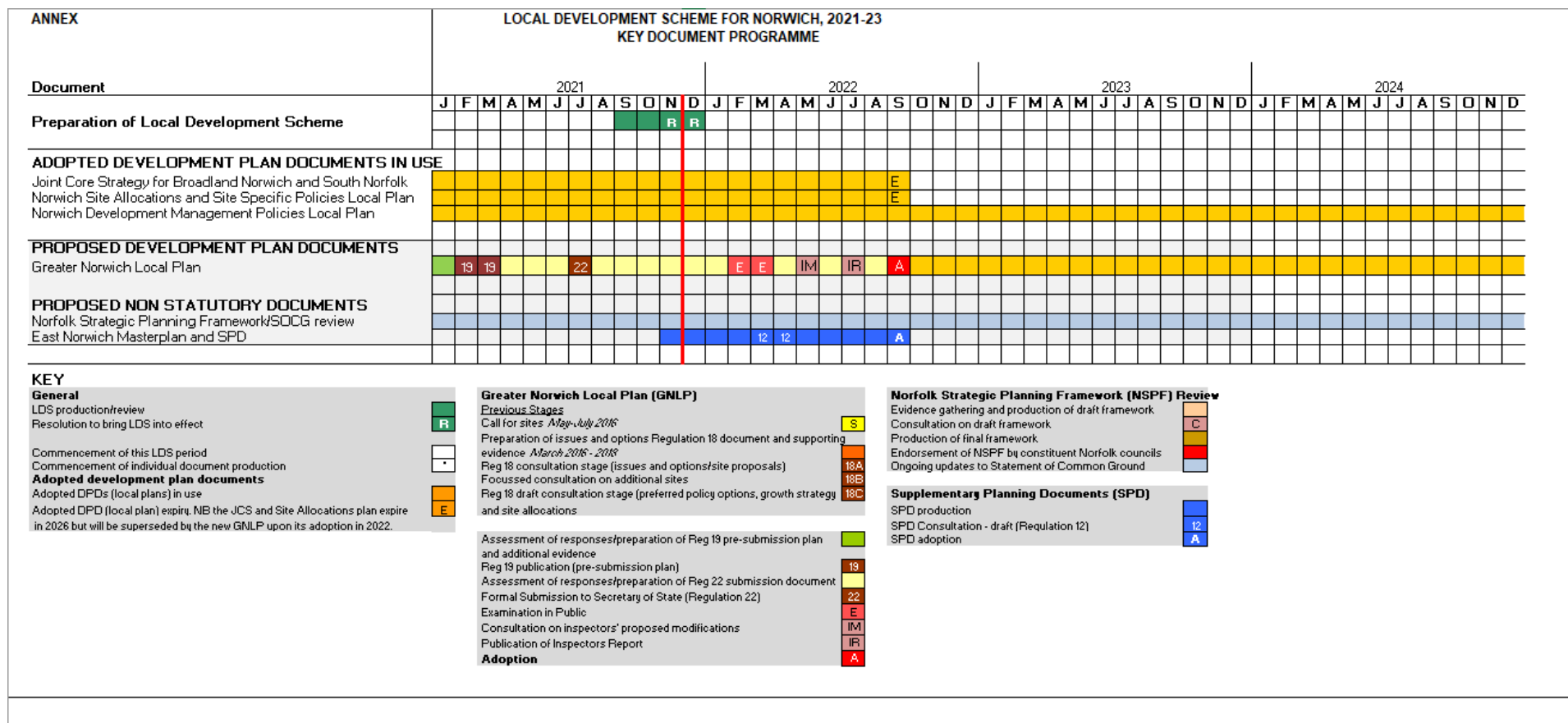
<b>Document Title</b>		<b>East Norwich Masterplan</b>
<b>Role and content</b>		A supplementary planning document for the East Norwich Strategic Regeneration Area to support policy in the GNLP for the coordinated redevelopment of the site and delivery of transformational change of this key area of Norwich.
<b>Status</b>		Non-statutory supplementary planning document.
<b>Geographical coverage</b>		East Norwich sites including the Deal Ground, Utilities Site, May Gurney and Carrow Works identified on East Norwich masterplan map <sup>11</sup> .
<b>Joint working arrangements (if any)</b>		A public-private partnership board has been formed to support the delivery of this ambitious and long-term project – The East Norwich Partnership. The partnership is led by Norwich City Council and includes Homes England, South Norfolk Council, Norfolk County Council, the Broads Authority, New Anglia Local Enterprise Partnership, Network Rail and the landowners.
<b>Conformity</b>		As a non-statutory document there is no formal requirement for conformity with higher-level national policy statements, however the masterplan will need to align with the principles set out within the GNLP and National Policy.
<b>Relationship with adopted local plan(s)</b>		The East Norwich Masterplan will be adopted as an SPD by the Greater Norwich authorities to support policies set out in the emerging GNLP.
<b>Production milestones (provisional)</b>		
<b>Overall production period</b>		November 2021 – March 2022
<b>Consultation</b>		March 2022 (6 weeks)
<b>Adoption</b>		September 2022 (alongside GNLP)

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<sup>11</sup> [East Norwich regeneration: Project overview | Norwich City Council](#)

<b>Monitoring and Review</b>	Ongoing
<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 NPPF'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>Document Title</b>	<b>Norfolk Strategic Planning Framework (NSPF) review</b>
<b>Production milestones (provisional)</b>	
<b>Revision of NSPF/SoCG endorsed</b>	<b>April 2021</b>
<b>Monitoring and Review</b>	Ongoing





**Committee Name: Sustainable development panel**

**Committee Date: 16/11/2021**

**Report Title: 2021 Norwich City Centre Shopping and Town Centre  
Floorspace Monitor & Local and District Centres Monitor**

**Portfolio:** Councillor Stonard, Cabinet member for inclusive and sustainable growth

**Report from:** Head of planning and regulatory services

**Wards:** All Wards

**OPEN PUBLIC ITEM**

**Purpose**

To report and discuss the findings of the 2021 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:**

To note:

- (1) the conclusions of the report;
- (2) the possible implications for development plan policies, particularly those relating to the retention of existing large floorspace comparison retail units in the secondary retail area/large district centres;
- (3) that officers considered it appropriate to repeat the survey in spring 2022 when the longer term trends may be easier to separate from the short term impacts of COVID. In conjunction with point 2 above, these findings should be used to inform a decision about whether a review of policies contained in the DM policies plan is needed.

**Policy Framework**

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets all three corporate priorities.

This report also helps to implement the local plan for the city.

This report helps to meet the business and the local economy objective of the COVID-19 Recovery Plan.

## Report Details

1. This report presents the findings of the 2021 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 recently it has been identifying that there is a need for greater flexibility to allow our high streets to evolve in order for them to thrive and particularly due to changes to the Use Classes Order and to government policy which have been introduced in the past year and due to the policy approach set out in the emerging Greater Norwich Local Plan, now is felt the best time to extend the scope of the Monitor.
3. The Monitor is based on a survey of the city's retail offer carried out in July 2021. This report updates members from the last monitor produced in October 2019. The 2019 survey reported on how remarkably resilient Norwich city centre has been in adapting to the unprecedented challenges arising from wider societal changes in employment patterns, shopping habits and leisure activities. The October 2019 report was published before the start of the COVID-19 pandemic and no-one could have anticipated what Norwich, the country and the world would go through in the coming couple of years.
4. As has been the case nationally, it is clear that the COVID pandemic has had an impact upon our high street and the monitoring report seeks to start to understand what changes have occurred since the last survey in October 2019.
5. Since the 2019 report there have been changes to both the Use Classes Order and Permitted Development Order which are likely to have an effect on the health of our city centre and district and local centres. The creation of a new Class E (commercial, businesses and services) means that buildings used for any purpose within Class E can now change to any other use within Class E without the need for planning permission. The introduction of Class MA now allows for the change of use from Class E to residential without considering all material planning considerations. The government's intention is that these measures will help high streets to adapt and thrive; however the Council has concerns that allowing the change of use to residential without the Council being able to consider the impact that the loss of town centre uses will have upon the viability and vibrancy of our centres could be harmful.

## Main findings of the 2021 Retail Monitor

6. The Norwich City Centre Shopping Floorspace Monitor and Local and District Centres Monitor (July 2021) is attached as Appendix 1. The main findings of the monitor are set out below:
  - (a) The vacant available retail *floorspace* in the city centre is 14.5% which is a significant increase from 2019's figure of 5.5%. Unsurprisingly this is the highest vacancy rate that we have seen in the plan period. Previously the highest figure in the plan period 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 increase from 10.0% in October 2019 to 15.2% in July 2021.

- (b) The percentage of vacant units has also increased from 10.1% to 14.1%. Whilst this is a significant increase of +4% it does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021<sup>1</sup>).
- (c) In terms of all town centre uses, vacant floorspace currently stands at 16.2% and vacant units at 15.2% which are both around 1% higher than retail only vacancies.
- (d) Overall the amount of retail floorspace in the city centre has decreased slightly since the last survey in October 2019. The amount of retail floorspace reduced by 1,534m<sup>2</sup> which is a 0.7% decrease. Whilst this is a relatively large decrease it is significantly less than in the previous monitoring period where between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m<sup>2</sup> which was a 2.8% decrease, largely due to the change of use of a number of units within Castle Quarter to leisure use. Interestingly the total number of retail units has remained the same between October 2019 and July 2021 which would suggest that some smaller units have actually changed back to retail.
- (e) Since the last survey was carried out a large number of national chains have been lost from the city centre whereas independent shops, particularly within the secondary retail area and the Magdalen Street Large District centre, have been more resilient during the pandemic.
- (f) Within the Primary retail area vacant available floorspace currently stands at 14.5% which is a significant increase from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. 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. Levels of non-retail have crept up in five of the seven frontage zones; however in one zone retail levels have actually increased.
- (g) Retail vacancies have continued to increase in the secondary retail areas since 2018 and in terms of available floorspace are now 23.1%. 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 during this monitoring period. If these units are omitted from both the vacant floorspace and total floorspace, the vacancy rate in the secondary retail area would only be 6.7% which is well below the national average and one of the lowest in the city centre. This shows that this secondary retail area (excluding the Cathedral retail park) is still performing well in providing independent retail diversity and by adapting rapidly it appears that it has remained resilient during the pandemic.
- (h) In the Large District Centres, vacancy rates have increased from 3.3% in 2019 to 9.1%. 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 in Riverside is 13.7% for floorspace and 19.0% for units whereas the Magdalen Street, Anglia

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<sup>1</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

Square and St Augustine's Large District Centre has significantly lower rates of vacancies at 7.0% for floorspace and 10.8% for units. The low vacancy rates in the Magdalen Street, Anglia Square and St Augustine's Large District Centre also correspond to the Local Data Companies findings that independents continued to be more resilient than multiples with growth in independents being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (cafes and fast food).

- (i) In the rest of the city centre (streets outside the defined areas), vacant available floorspace has increased significantly from 5.9% in 2019 to 13.7% in 2021. 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. The percentage of vacant retail units in the rest of the city centre has more than doubled from 22 units (9.2%) in October 2019 to 25 units (19.4%) in July 2021. Whilst this is a significant increase it is no higher than it was in June 2018.
  - (j) Vacancy rates in the ten existing district centres have increased marginally to 9.8% from 9.7% which is significantly lower than it was in 2018 where 11.6% of units stood vacant. Vacancy rates in the 28 local centres have increased to 12.7% from 7.1% in 2019. Vacancy rates vary considerably within each of the district and local centres but overall the centres have a lower average vacancy than the city centre. This would suggest that the local centres are continuing to be relatively robust and vibrant and to offer an appropriate range of local services and facilities, with food stores being most important to their success. This may suggest that during the pandemic more people shopped locally.
  - (k) Over the past decade there has been a significant growth in out of town retailing, particularly in South Norfolk and Broadland with new comparison goods shops opening as well as a significant growth in the number of supermarkets and fast food outlets. Furthermore there has been a significant change in the nature of several of Norwich's employment areas and not only have a lot of DIY trade counters for instance opened, another noticeable change is the number of leisure uses that are now on employment sites.
7. Retail vacancy rates have risen significantly since October 2019 and rates have increased in all city centre areas as well as within the District and Local Centres. This is unsurprising given the challenging circumstances faced by retailers and given that there have been three lockdowns when all shops and leisure facilities have been forced to close other than essential retail. Furthermore for much of the period footfall within the city centre has been extremely low partly due to the 'work at home' message and also due to people choosing to either shop locally or turning to online retailing.
8. Many shops have managed to reopen following lockdowns but despite there being business rate relief and other government support many shops have been unable to survive the impact of the pandemic. In particular, Norwich has lost a significantly high number of multiples over the monitoring period and a number of these such as Debenhams and Topshop previously occupied large and prominent locations. Notwithstanding this it would appear that many of Norwich's independent retailers have been performing well and this can be shown by the low 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 vacancy rates are only 6.7% and 7.0% which is extremely low when compared to a national average retail vacancy rate of 15.8%. There has also been some new chains opening in Norwich which would suggest that Norwich is seen as a good place to invest.

9. In terms of the total amount of retail floorspace within the city centre, whilst it continues to decrease, the rate has slowed and during this monitoring period there has only been a reduction of 1,534m<sup>2</sup> (0.7%) which is considerably less than that which was lost in 2018/19 where retail floorspace decreased by 6,231 m<sup>2</sup> (2.7%). 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 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. 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 (possibly such as those with a large floorspace in secondary retail areas/the large district centres e.g. Cathedral Retail Park) need to be repurposed to other town centre uses or uses that are compatible in a town centre environment.
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 the past 18 months have been even more challenging as a result of the COVID pandemic. These challenges are likely to have an ongoing impacts for the viability of some retail businesses.
12. It is however encouraging that footfall has significantly increased following the lifting of restrictions, particularly in terms of visitors to the city. With the majority of adults now having received their COVID vaccine it is hoped that confidence will continue to build and people will start to use the high street in a similar way than they did before the pandemic. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving. 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.
13. It is however important to acknowledge that there are many changes that can now take place within retail centres without the requirement for planning consent from the council which include the change of use to other town centre uses but also the change of use to residential. 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 a number of 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 centre uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses 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 monitor change over the coming few years.

14. Notwithstanding the above, despite a reduction in retail floorspace and an increase in vacancy rates, given the circumstances Norwich has demonstrated that it remains relatively robust and is still a thriving retail centre in the East of England. To continue this relative success, the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced, including working closely with Norwich BID and other key stakeholders. Furthermore it is going to be fundamental to continue to monitor the situation and therefore it is suggested that moving forward we monitor more frequently. It is suggested that the next survey is carried out in spring 2022 when the longer term trends may be easier to separate from the short term impacts of COVID. This will help us to consider the direction of travel for our town centre and retailing policies and increasing the frequency of monitoring will assist when considering the policy response and in making a decision about whether a review of policies contained in the DM policies plan is needed.

## **Consultation**

15. 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**

16. The report has flagged up the importance of monitoring and the need for it to be carried out more frequently. Furthermore the findings will have implications both in terms of informing planning decisions and in terms of considering future policies. The monitoring report flags up that there is a need to be more flexible and therefore it will be necessary to review our existing Development Management Policies and to consider which are still fit for purpose. Whilst we do not have the resources to review the Development Management Policies DPD at the current time (and as it is considered best to wait until the public examination of the GNLP is complete) this report can help us consider the likely direction of travel for our town centre policies in the future. Furthermore it will be necessary to consider what implications there are in terms of any site allocations, particularly in terms of strategic allocations such as Anglia Square.

## 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 2019-22 and Budget.
18. 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

19. 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.
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

20. The findings of this report would indicate that changes will be needed to our policies in the future. One option could be to review the policies now; however we do not have the resources to do this currently and it is felt best to await the outcome of the public examination of the GNLP.

21. In terms of the frequency of monitoring, the council could carry on doing this at the existing rate which is approximately once a year. It is however proposed to increase frequency, possibly to around every six months. Increasing how regularly we monitor will assist in making planning decision and help inform the future direction of policies.

### **Reasons for the decision/recommendation**

22. 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. Consideration also needs to be given to whether the council should increase the frequency of retail monitoring. It is not recommended to make changes to policies at this point in time due to resource implications; however it is useful to begin discussions.

**Background papers:** None

**Appendix:** Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor (July 2021)

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



Survey at July 2021

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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 Government<sup>1</sup>.
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 full retail floorspace monitor was carried out in October 2019 with surveys done of both the City Centre and the District and Local Centres. A report was written entitled Norwich City Centre Floorspace Monitor & Local & District Centres which reported how remarkably resilient Norwich city centre has been in adapting to the unprecedented challenges arising from wider societal changes in employment patterns, shopping habits and leisure activities. The October 2019 report was published before the start of the COVID-19 pandemic and no-one could have anticipated what Norwich, the country and the world would go through in the coming couple of years.
3. In order to gain some indication as to how our high street was coping in the middle of a pandemic, in October 2020 a survey was carried out of the city centre retail area. A decision was made that a full report would not be written at this time as it would be better to carry out an additional survey in early 2021 in order to give a better understanding of what impacts COVID-19 has had on our city. Furthermore, the decision was made in October 2020 not to survey the District and Local Centres due to the practicalities of doing this during the pandemic.
4. Restrictions were in place longer than anticipated and for this reason it was felt best to delay the 2021 survey until restrictions were lifted. The lifting of restrictions in England took place on 19<sup>th</sup> July 2021 so a decision was made to do the survey work at the end of July. This delay in completing the survey work also allowed for a period of adjustment for essential and non-essential retail as well as the hospitality industry as they had been allowed to open for several months which has provided time to see which business have been able to survive and which businesses unfortunately have had to close their doors permanently.
5. As has been the case nationally, it is clear that the COVID pandemic has had an impact upon our high street and this report seeks to start to understand what changes have occurred since the last survey in October 2019. 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 recent years

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<sup>1</sup> [Greater Norwich Local Plan, Publication Draft Plan paragraph 309](#)

there has been a general acceptance, including in government policy that high streets do need to evolve in order for them to thrive. Since the 2019 retail monitor there have been changes to both the Use Classes Order and General Permitted Development Order and these changes, which are likely to have an effect on the health of our City Centre and District and Local Centres, are summarised in the following section.

6. Particularly given changes to the Use Classes Order it is now proposed that this report also includes some data on vacancy rates for a wider range of 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) as it is important that we start to look at our high street holistically. 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 revised 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. As this is the first year of reporting vacancies for all town centre uses, we are unable to look at trends, however in the future this should help assist with policy monitoring and help inform / support initiatives such as a city centre strategy. The report also provides some information on Norwich's out of town retail centres as this is an area where there has been some growth in recent years which may impact upon the City Centre.

## **Policy Context**

### ***Existing policy framework***

7. The National Planning Policy Framework 2019 (NPPF 2019) was published in February 2019. 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". "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.
8. 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)<sup>2</sup>. 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 autumn 2022 following the Local Plan examination in early 2022.

9. 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.
10. 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.
11. 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.
12. 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 below a specified minimum level.
13. 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.

### ***Recent government changes***

14. Since the last monitoring report was published, changes have taken place to both the Use Classes Order and General Permitted Development Order which could have significant impacts upon Norwich's retail and town centre provision.
15. Firstly the Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories known as 'Use Classes'. On 1<sup>st</sup> September 2020 a significant update to the Use Class Order took place. The changes saw a number of existing use classes replaced by a new 'Class E' (Commercial, businesses and services) which means that buildings used for

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<sup>2</sup> 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

any purposes within Class E can now change to any other use within Class E without the need for planning permission.

16. The government's aim is 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. The following uses have now been revoked and have been replaced by Class E

- A1 (retail)
- A2 (Financial and Professional)
- A3 (Café and Restaurant)
- B1 (Business)
- D1 (Clinics, Health Centres & Creches)
- D2 (Leisure)

17. Not included within Class E are Drinking Establishments (A4), Hot Food Takeaways (A5), Cinemas and Bingo Halls (D2) which become 'sui generis' and will require full planning permission to change to any other use.

18. Class D (both D1 and D2) has also been revoked and uses that do not now fall within class E now fall within F1 and F2 which are as follows:

- F1 Learning and non-residential institutions
  - F1(a) Provision of education
  - F1(b) Display of works of art (otherwise than for sale or hire)
  - F1(c) Museums
  - F1(d) Public libraries or public reading rooms
  - F1(e) Public halls or exhibition halls
  - F1(f) Public worship or religious instruction (or in connection with such use)
  - F1(g) Law courts
- F2 Local community
  - F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
  - F2(b) Halls or meeting places for the principal use of the local community
  - F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
  - F2(d) Indoor or outdoor swimming pools or skating rinks

19. A further important change that has occurred is the introduction of Class MA which is a new permitted development right to allow for the change of use from Class E (commercial, business and service use) to residential (class C3). This did not come into force until 1<sup>st</sup> August 2021 so will not have affected this survey. There are some limitations and conditions but in effect it means that many commercial premises in our retail centres can now change to residential without considering all material planning considerations. The government's intention is that this will help 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***

20. The Greater Norwich Local Plan is due to replace the Joint Core Strategy towards the end of 2022 (subject to a successful examination). 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.
21. 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.
22. 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 strengthen Norwich City Centre's role as a visitor and cultural destination.
23. 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 which has been further impacted by COVID-19 and its economic consequences.
24. The Norwich City Centre Future Strategy<sup>3</sup> 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.

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<sup>3</sup> [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	14.5%	15.8%	11.3%

25. 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 2021 (Looking beyond Lockdown: GB Retail and Leisure Market Analysis H1 2021, published September 2021). This sets out how the past couple of years has been a critical period for the retail and leisure sector with lockdowns forcing a significant proportion of the market to close three times in the past 18 months. The key findings from their most recent publication are as follows:

- 1) Independents continued to be more resilient than multiples.
- 2) Shopping centres continue to be the location type under the most pressure with vacancy rates rising from 15.5% to 19.4%, which is the largest half year increase tracked by LDC since 2013. Shopping centres have been the most exposed to at-risk categories during the pandemic particularly where anchor stores are lost.
- 3) Fast food and food delivery has been the fastest growing category.
- 4) Vacancy rates have increased since the start of the pandemic but the rate of change is starting to slow. The GB vacancy rate sat at 14.5% at the end of Q2 2021, up 2.1% on the previous year. Whilst the all vacancy rate is 14.5%, retail vacancy rate is 15.8% and leisure vacancy rate is 11.3%.
- 5) There has not been a swift return to the office with the opening of shops and easing of social distancing.

26. The report also looks into online sales and the report sets out that data from the Office of National Statistics reveals that online spend across the entire retail market rose to 28.1% at the end of H1 2020, a huge increase from 7.8% in H1 2019. The pandemic necessitated a reliance on online shopping during extended periods of closure for physical stores. However demand for offline shopping has remained high following the relaxing of restrictions. Online sales still made up 26.7% of all retail sales at the end of H1 2021, which is only a decrease of 1.4% on the same period in 2020. This is still 7.8% above the pre-pandemic figure of 18.9% showing that many people plan to continue to shop online. The report then goes on to say that whilst market conditions were intensely challenging in H1 2021, there are signs that we are moving from 'survival mode' to a place where recovery and regeneration can begin to take place.

27. Despite the closures figures and data on the increasing proportion of retail sales taking place online, physical stores remain a key strategic resource. In terms of the coming months, the extension of government support has helped limit the damage to the market that many had expected this year; however the 10% of

units across the market that were still temporarily closed as of July 2021 points to a potential problem on the horizon for 2022 as we inch closer to the end of the moratorium and business rates relief. With the end of government support pushed back to 2022, H2 2021 is likely to see the 'calm before the storm'. It is anticipated that vacancy rates are likely to increase at a slower pace, in part due to the increased repurposing of commercial retail property into residential facilitated by the introduction of new permitted development rights.

## Main Findings for Norwich

### City Centre Overview

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change
City Centre (Retail only)	15.2%	14.5%	14.1%	0.7% decrease

28. 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.

29. However due to recent 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, for the first time this report also gives vacancy rates for all town centre uses. This is measured in two ways, vacancies as a proportion of all floorspace and vacancy rate as a proportion of all units.

30. The vacant available retail *floorspace* in the city centre is 14.5% which is a significant increase from 2019's figure of 5.5%. Unsurprisingly this is the highest vacancy rate that we have seen in the plan period. Previously the highest figure in the plan period was 12.4% in 2010 which compares to the lowest figure of 4.2% which was experienced in 2014.

31. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also increased from 10.0% in October 2019 to 15.2% in July 2021. This is an increase of more than 5% from the last survey in October 2019.

32. The percentage of vacant *units* has also increased from 10.1% to 14.1%. Whilst this is a significant increase of +4% it does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021<sup>4</sup>). 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.

33. In terms of all town centre uses, vacant floorspace currently stands at 16.2% and vacant units at 15.2% which are both around 1% higher than retail only vacancies. This would suggest that by adding leisure uses (including cafes,

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<sup>4</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

restaurants, bars and takeaways) as well as financial, professional and other services the percentage of vacant units and floorspace has increased. 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.

34. Overall the amount of retail floorspace in the city centre has decreased slightly since the last survey in October 2019. The amount of retail floorspace reduced by 1,534m<sup>2</sup> which is a 0.7% decrease. Whilst this is a relatively large decrease it is significantly less than in the previous monitoring period where between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m<sup>2</sup> which was a 2.8% decrease. This loss in 2018/19 was largely attributed to the change of use of a number of units within Castle Quarter to leisure use. This would suggest that whilst some retail units are still being lost to other uses, the rate of loss is now occurring at a slower pace.
35. Interestingly the total number of retail units has remained the same between October 2019 and July 2021. This would suggest that it is the larger units that are changing away from retail whilst some of the smaller units are actually reverting back to retail use.
36. In terms of refurbishment, there has been a significant decrease in under construction/refurbishment floorspace since the last monitoring report. This is due to Primark on Haymarket/White Lion Street being completed in December 2019. At the time of the last survey New Look in Castle Quarter was also closed for refurbishment. Whilst this did reopen, unfortunately it has now permanently closed so the 1,088m<sup>2</sup> unit now falls within the vacant floorspace.
37. 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. Between 2018 and 2019 there was also a significant growth in leisure uses with, for example, the opening of a bowling alley, soft play, gym and retro gaming centre within the Castle Quarter. Whilst these changes have been occurring at a slower pace than between 2018 and 2019 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, especially as the city recovers from the pandemic.
38. Change away from retail is clearly a trend that has been experienced nationally. The GB Retail and Leisure Market Analysis H1 2021 (published September 2021 by the Local Data Company<sup>5</sup>) has set out that the leisure sector saw significant year-on-year improvements however over the past year this improvement has been driven by the café and fast food units alone, as other leisure categories, including entertainment, restaurants and bars, pubs and clubs have declined.

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<sup>5</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

39. Since the last survey was carried out, some large national chains have been lost from the city centre including Debenhams, Topshop/Topman, Outfit, Game, West Cornwall Pasty Company, Jack Wills, The Edinburgh Woollen Mill, STA Travel, Peacocks, Hawkins Bazaar, Paperchase, Cath Kidson, Giraffe, Timberland, Bathstore, Fired Earth, Loch Fyne, Laura Ashley, Thorntons, Evans and Mothercare. There has also been further loss since the survey was completed with Disney Store closing down. Some of these brands have since moved into other stores such as Bathstore is now within Homebase on Hall Road Retail Park and Jack Wills have space within House of Fraser. There are also some shops such as Argos and New Look that have rationalised the number of stores that they have but they have kept a presence within the city. On a more positive note however there are a number of stores which nationally have rationalised but have retained their presence in central Norwich which include New Look, Marks and Spencer and House of Fraser. This is a positive sign for the health and attractiveness of Norwich City.
40. Furthermore there are a number of national chains that have recently opened in Norwich (some of which opened after the survey work was completed). This includes Montezuma's, Deichmann, Hamleys, H&M Home and The Real Greek. This is a positive sign and suggests that Norwich is seen as a good place for investment. The Royal Arcade was also recently up for sale and sold for £3.375m with the new director saying that the goal is to have the Arcade full and bustling as soon as possible.
41. There has been a 5.7% decrease in retail floorspace since 2008 and 0.7% of this was in the past monitoring period (with 2.8% being in the previous monitoring period). 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. 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.
42. The city centre has undergone some major public realm and traffic changes over the past few years with a number of streets being closed to general traffic, being made one-way or being pedestrianised. This increases the attractiveness of the city to shoppers. Public realm improvements that have recently been completed, are in progress or are in the pipeline include Tombland, London Street, Prince of Wales Road, King Street, Cleveland Road, Hay Hill and St Stephen's Street. Works are also ongoing to create a mobility hub at the train station and to increase the capacity of the bus station.
43. Over the past monitoring period there has also been a significant increase in outdoor seating and pedestrianisation with traffic being restricted in some of Norwich's street, so cafes can have outdoor seating and people can abide by social distancing rules. This has included St Benedict's Street and Exchange Street. Whilst these were initially done on a temporary basis, the County

Council are seeking to make these changes permanent as part of the Connecting the Norwich Lanes<sup>6</sup> project. This project will also include a new riverside footbridge between Duke Street and St Georges Street, a new cycle track and crossing facilities on St Andrew's Street and creating a better environment for enjoying the St Giles Street area on foot.

44. Norwich is also embarking on a wayfinding project which will replace the existing city centre wayfinding system and hopefully make it easier for people to find their way around and in July 2020 Norwich City Council produced a city centre Public Spaces Plan<sup>7</sup>. The Plan shows the location of proposed projects and also explains the funding sources and implementation timescales. Funding sources include the Transforming Cities Fund, New Anglia Local Enterprise Partnership, Community Infrastructure Levy, Towns Fund, Section 106/278 and developers. A new bike sharing scheme (Beryl bikes) was also introduced in 2020 which makes the city centre more accessible.
45. Also of particular importance is the fact that Norwich City Council established a Town Deal Board in Autumn 2019 to bid for £25m of government investment. Eight full business cases to deliver skills, enterprise infrastructure and urban regeneration into Norwich were developed and submitted to government in January which includes the projects sets out in figure 1 below. Full business cases were submitted to government throughout 2021 and all of Norwich's Towns Deal Fund Business Plans were approved by MHCLG in August. The 2021/22 payment will see approximately £15.5M of government investment into Norwich's skills and enterprise infrastructure and urban regeneration. The notification of funding release means that delivery of the projects can now start which is an extremely exciting time for Norwich. This has put Norwich at the leading edge of the government's Towns Fund Programme, and among the first of the 101 towns to have 21/22 funding released.

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<sup>6</sup> [Connecting the Norwich Lanes - Norfolk County Council](#)

<sup>7</sup> [City centre public spaces plan | Norwich City Council](#)









	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

46. The above is an incredible achievement and shows how committed Norwich City Council is to growing and supporting the city's economy. Of particular note are the public realm improvements and branding. Furthermore whilst a number of the other 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.

47. 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 GVA<sup>8</sup> and a further update was produced in December 2020<sup>9</sup> by Avison Young 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 11,000m<sup>2</sup> - 15,000m<sup>2</sup> comparison retail floor space to 2027. Further

<sup>8</sup> GVA, "Greater Norwich Employment, Town Centre and Retail Study" (2017)

<sup>9</sup> Avison Young "Greater Norwich Town Centres & Retail Study Update" (December 2020)

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.

48. 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.
49. Finally it is important to look at the footfall figures from the Norwich Business Improvement District (BID). Within the October 2019 retail monitor it was reported that the city centre was experiencing a decline in footfall; down 2.1% on the previous year. Unsurprisingly and due to the impact of three lockdowns, footfall has changed considerably over this monitoring period. The Norwich Evening News<sup>10</sup> reported that footfall in Norwich rose by 444% the week the high street reopened with nearly 50,000 people visiting the shops. A week prior to lockdown easing only 9,167 people were out and about in the city centre but on April 12 this figure was 49,956. Furthermore it is reported that the month on month picture is similarly positive, with Norwich performing above the national average at 52.4% increase compared to 24% across the UK and 28.8% increase for the East of England.
50. It is encouraging to see that people are returning to the shops, restaurants and leisure facilities and visitors are coming to Norwich; however not as many people have returned to the offices full time as expected and the Local Data Company reports that a hybrid working model is likely to be the short to medium term future. With less people working in the city centre on a daily basis, it is likely that our high street will take longer to recover and will continue to feel the impact of the pandemic.
51. **Summary:** The results of the survey for the city centre as a whole presents a mixed picture. Whilst there has been a significant increase in vacant floorspace and units, it has been an unprecedented 18 months due to the COVID-19 pandemic. Over this period there have been three lockdowns where only essential retail have been able to open and therefore it is no surprise that some

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<sup>10</sup> Norwich Evening News 14 April 2021 - [Footfall in Norwich rises 444pc on reopening day | Norwich Evening News \(eveningnews24.co.uk\)](https://www.eveningnews24.co.uk/news/444pc-rise-in-footfall-on-reopening-day-in-norwich-1-1444444)

shops have struggle to survive, despite there being government support. Furthermore whilst the percentage of vacant *units* has increased from 10.1% to 14.1%, this does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021<sup>11</sup>).

52. Footfall levels are increasing again in the city and whilst the next year or so is extremely uncertain, there clearly is investment being made into Norwich and therefore it is hoped that there will be a slow down in decline and that our city centre will start to recover. The Norwich city centre retail offering does appear to be fairly robust, largely due to the strength of independents, but careful consideration does 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 our current and future policies.
53. 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.

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<sup>11</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

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

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
<b>July 2021</b>	<b>216,005</b>	<b>183,211</b>	<b>31,409</b>	<b>1,385</b>
<b>October 2020</b>	<b>215,949</b>	<b>193,658</b>	<b>21,686*</b>	<b>605</b>
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
<b>July 2021</b>	<b>971</b>	<b>834</b>	<b>130</b>	<b>7</b>
<b>October 2020</b>	<b>976</b>	<b>833</b>	<b>140**</b>	<b>3</b>
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>	
<b>July 2021</b>	<b>15.2%</b>	<b>14.5%</b>	<b>14.1%</b>	
<b>October 2020</b>	<b>10.3%</b>	<b>10.0%</b>	<b>14.7%</b>	
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%
<b>Overall retail floorspace change</b>			
Since October 2019	<b>Decreased by 1,534 sqm (0.7% decrease)</b>		
Since July 2008	<b>Decreased by 13,115 sqm (5.7% decrease)</b>		

\* of which 998sqm appears to be closed due to COVID (still set up for trading).

\*\* of which 13 appear to be closed due to COVID (still set up for trading).

**Table 2: Summary of all town centre uses vacancy rates**

	<b>As a proportion of all floorspace</b>	<b>As a proportion of all units</b>
	<u><i>Vacant+Refurbishment</i></u> <i>All</i>	<u><i>Vacant+Refurbishment</i></u> <i>All</i>
Norwich City Centre	16.2%	15.2%
Primary retail area	14.7%	15.5%
Secondary Retail area	20.6%	11.6%
Large District Centre	9.3%	11.6%
Rest of Centre	22.0%	18.1%

**Table 3: Summary of retail only vacancy rates**

	<b>As a proportion of all retail floorspace</b>	<b>As a proportion of all retail units</b>
	<u><i>Vacant+Refurbishment</i></u> <i>All</i>	<u><i>Vacant+Refurbishment</i></u> <i>All</i>
Norwich City Centre	15.2%	14.1%
Primary retail area	14.9%	15.2%
Secondary Retail area	23.3%	9.8%
Large District Centre	9.1%	10.9%
Rest of Centre	19.2%	19.4%

## The Primary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change
Primary Retail Area (Retail only)	14.9%	14.5%	15.2%	1.2% decrease

54. The extent of the primary area, containing the shopping centres and main comparison goods stores, is shown on Map 1.
55. The vacant available *floorspace* rate is 14.5% in the primary retail area. This is a significant increase in percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. In October 2020 vacancy rates were at 8.4% and the more recent significant increase in floorspace has been a result of some large shops closing down such as Debenhams and Topshop. Previously the peak vacancy rate within the primary retail area was in 2010 when it was 11.7%.
56. Primary Area retail vacancy rates 'as a proportion of all retail floorspace' has also increased to 14.9%. In 2019 there was a large disparity between vacant + refurbishment (10.5%) and vacant (4.1%) which was attributed to the large-scale redevelopment and extension to Primark which has a floor area of 7,735m<sup>2</sup> and the refurbishment of New Look within the Castle Quarter which has a floor area of 1,088 m<sup>2</sup>. The new Primark store opened in December 2019. The temporary store on St Stephen's Street which is 3,145 m<sup>2</sup> has now been vacated by Primark and remains empty. New Look within Castle Quarter did reopen but has since permanently closed.
57. The percentage of vacant retail *units* in the Primary Area has increased to 15.2% in 2021, up from 11.1% in 2019. Previously the highest rate during the plan period was 14.1% in 2015. As in recent years, this figure being higher than the floorspace vacancy figure implies that smaller shops remain difficult to let in the primary area; however the vacancy rate has fallen slightly since October 2020 which may suggest that some shops that were closed temporarily during COVID have now reopened. The reason for higher vacancies in smaller shops may be an issue related to rental values or the viability of small businesses in general.
58. These vacancies rates are of concern particularly as they have increased so significantly over the monitoring period and are now very close to the national average retail vacancy rate of 15.8% (Looking beyond lockdown: GB Retail and Leisure Market Analysis H1 2021, Local Data Company, published September 2021<sup>12</sup>).

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<sup>12</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (2021)

59. The overall amount of floorspace in A1 retail use has decreased by 1,831m<sup>2</sup>, and reduced by 2 units in the Primary Area since 2019. 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 m<sup>2</sup>) 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.
60. The change of use of a number of units away from A1 did prevent a number of units in Castle Quarter sitting empty and helped decrease the vacancy rate in the centre from 26% to 18%. However a number of units closed during the pandemic and whilst some of these have reopened a number remain shut. Long term vacancies in Castle Quarter is still of concern and unfortunately largely as a result of the pandemic it is too soon to see how successful the leisure uses are that now occupy the Castle Quarter. It is however still hoped that diversification into the leisure sector will continue to prevent 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. The use of the foodcourt as a vaccination centre for example, will have prevented vacancies but will also have significantly increased footfall within the centre.
61. Chantry Place (formerly Chapelfield) on the whole remains well occupied and at the time of the survey only 10 units were vacant out of a total of 93 (10.8%). This is a slight increase but is still below the average for the primary retail area and since the survey was completed some units have since been occupied include by H&M Homes and Hamleys Toy shop.
62. The last report set out how in 2019 the Royal Arcade has experienced a significant change with half of the units now being vacant (8 out of 16 units). Now only five units are vacant; however plans to amalgamate three empty units to create a new restaurant never materialised. The Arcade has recently been sold and it is hoped that the new owner will work with the Council and BID to help further decrease vacancies in this prominent location.
63. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 14.7% (compared to retail only of 14.9%) and the percentage of vacant units is 15.5% (compared to retail only of 15.2%).
64. 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
<b>July 2021</b>	<b>148,263</b>	<b>126,098</b>	<b>21,564</b>	<b>601</b>
<b>October 2020</b>	<b>148,498</b>	<b>135,424</b>	<b>12,469*</b>	<b>605</b>
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
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>	
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**

65. 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).
66. Table 5 provides data on the percentage of retail uses in the primary area retail frontage zones in July 2021. None of the frontages have dropped below their minimum thresholds as set out in the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014) and overall, the retail frontages appear relatively healthy. There have not been any significant changes since 2019 although levels of non-retail has crept up in five of the seven zones (PC01: Gentleman's Walk/Haymarket/Brigg Street, PC02: Castle Mall, PC03: Chapelfield, PR01: Back of the Inns/Castle Street area and PR03: St Stephens Street/Westlegate). However in PR02: The Lanes east retail levels have continued to increase and in PR06: Timberhill/Red Lion Street there has been no change.
67. This would suggest that in the past couple of years there has been fewer changes away from retail to service and leisure uses overall than there was previously when there was a significant increase in non-retail frontage in PC03: Castle Quarter when non retail increase from 38.3m (4.4%) in June 2018 to 129.9m (14.8%) in October 2019.
68. Overall, whilst the percentage of A1 retail frontage within some primary retail area core frontage zones has declined, in other areas it has increased and overall retail frontages still remain at relatively comfortable levels above their minimum thresholds.

**Table 5: Primary Area Retail Frontage Zones - Retail frontages in July 2021**

Frontage zone	Total frontage (m)	Total non-retail frontage Oct 2019	% A1 retail July 2021 (frontage)	% A1 retail Oct 2019 (frontage)	Minimum threshold (from 2014 SPD)
<b>Primary retail area core frontage zones</b>					
PC01: Gentleman's Walk/ Haymarket/Brigg Street	856.4	101.6	88.1%	88.8%	80%
PC02: Castle Mall (Levels 1 & 2)	898.1	152.3	83.0%	85.2%	80%
PC03: Chapelfield, upper & lower Merchants Hall and St Stephens Arcade	641.0	27.5	95.7%	97.1%	80%
<b>Frontage zones in the rest of the primary retail area</b>					
PR01: Back of the Inns/Castle Street area	666.8	215.2	67.7%	69.7%	65%
PR02: The Lanes east (Bedford Street/Bridewell Alley)	1116.3	314.3	71.8%	71.4%	70%
PR03: St Stephens Street/Westlegate	831.5	136.4	83.6%	84.1%	80%
PR04: Castle Meadow north		N/A <sup>13</sup>			
PR05: Chapelfield Plain		N/A <sup>14</sup>			
PR06: Timberhill/Red Lion Street	434.2	147.8	66.0%	66.0%	60%

Key:

Green denotes no change or increase in A1 retail since 2019

Red denotes decrease in A1 retail since 2019.

Blue denotes frontage is within minimum A1 threshold.

Orange denotes minimum A1 frontage threshold has been breached.

<sup>13</sup> There is no defined frontage in this zone

<sup>14</sup> There is no defined frontage in this zone

## The Secondary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change
Secondary area (Retail only)	23.3%	23.1%	9.8%	1.1% increase

69. Map 3 shows the extent of the secondary area.

70. 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 2019 vacancy rates remained high with a slight further increase to 18.3% and they have now increased further to 23.1%.

71. 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%. Between 2018 and 2019 there was no change in the percentage of vacant retail units but this has now increased to 9.8%.

72. The overall amount of floorspace in A1 retail use has increased since the last survey in 2019 (by 248m<sup>2</sup>) and there has also been an increase in units in the Secondary Shopping area since the last survey in 2019 (from 181 to 183).

73. 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 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 3,222m<sup>2</sup> and more recently the closure of a further unit at the Retail Park which has a floorspace of 632m<sup>2</sup>. If these two unit are omitted from both the vacant floorspace and total floorspace, the vacancy rate within the secondary retail area would only be 6.7% which is well below the national average and one of the lowest in the city centre. Furthermore vacancy rates '*as a proportion of all retail units*' are lower in the secondary area than any other area within the city and the only area where this is below 10%. This is very competitive when compared to the GB national average retail vacancy rate of 15.8%<sup>15</sup>.

74. 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 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 has remained resilient during the pandemic.

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<sup>15</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

75. The low vacancy rates in this area (excluding Cathedral Retail Park) also correspond to the Local Data Companies findings that independents continued to be more resilient than multiples with growth in independents being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (cafes and fast food). Independents are also likely to have benefited from government support measures and business rates relief which has enabled them to remain operational.

**Table 6: Secondary area**

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
<b>July 2021</b>	<b>21,859</b>	<b>16,775</b>	<b>5,060</b>	<b>24</b>
<b>October 2020</b>	<b>21,933</b>	<b>17,180</b>	<b>4,753*</b>	<b>0</b>
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
<b>July 2021</b>	<b>183</b>	<b>165</b>	<b>17</b>	<b>1</b>
<b>October 2020</b>	<b>185</b>	<b>169</b>	<b>16**</b>	<b>0</b>
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><math>\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}</math></i>	As a proportion of retail floorspace excluding space being built or refitted  <i><math>\frac{\text{Vacant}}{\text{All}}</math></i>	As a proportion of all retail units  <i><math>\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}</math></i>	

<b>July 2021</b>	<b>23.3%</b>	<b>23.1%</b>	<b>9.8%</b>
<b>October 2020</b>	<b>21.7%</b>	<b>21.7%</b>	<b>8.6%</b>
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%

\* of which 186 sqm appears to be closed due to COVID (still set up for trading).

\*\* of which 2 appear to be closed due to COVID (still set up for trading).

## The Secondary Area: Retail Frontages

76. 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).
77. Table 7 provides data on the percentage of retail uses in the secondary area retail frontage zones in July 2021. Out of the three secondary areas that have frontage zones, one (SR03: St Benedicts) is below the minimum threshold as set out in the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014). However during the monitoring period the proportion of retail has actually increased and it would only take a few more units to change back to retail for the frontage zone to no longer be below the threshold. Notwithstanding this, overall the retail frontages appear relatively healthy and in all three frontage zones the percentage of retail has surprisingly increased.
78. This would suggest that in the past couple of years there has been fewer changes away from retail to service and leisure uses and overall retail frontages remain at relatively comfortable levels above their minimum thresholds.
79. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 20.6% (compared to retail only of 23.3%) and the percentage of vacant units is 11.6% (compared to retail only of 9.8%).

**Table 7: Secondary area retail frontage zones**

Frontage zone	Total frontage (m)	Total non-retail frontage July 2021	% A1 retail July 2021 (frontage)	% A1 retail Oct 2019 (frontage)	Minimum threshold (from 2014 SPD)
<b>Secondary retail area core frontage zones</b>					
SR01	404.1	96.5	<b>76.1%</b>	74.1%	70%
SR02	121.7	39.4	<b>67.6%</b>	65.4%	60%
SR03	638.0	259.1	<b>59.4%</b>	59.2%	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
Large District Centres (Retail only)	9.1%	9.1%	10.9%	0.7% increase

80. 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.
81. The vacant available floorspace in the LDCs is currently 9.1% which is a significant increase from 2019 when only 3.3% of available floorspace was vacant. Whilst this is the highest that it has been since Riverside has been included in the LDC, it is still significantly lower than 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.
82. The percentage of vacant retail *units* in the LDCs has increased marginally since 2019 (from 10.2% to 10.9%) but this is still lower than it was in June 2018 when 11.4% of units were empty. In 2019 the difference between vacant floorspace and vacant units would have suggested that the larger units were faring well but that the smaller units were harder to find and retain retailers. Vacant floorspace has now nearly caught up with vacant units which would suggest that some of the larger units became vacant during the monitoring period.
83. In 2019 it was reported that Riverside was fully let but the closure of Mothercare, Outfit and Carphone Warehouse has now left three units empty which at 593m<sup>2</sup>, 1,530 m<sup>2</sup> and 196 m<sup>2</sup> respectively has had a significant impact on the vacancy figures for the Riverside Large District Centre with 13.7% of floorspace being vacant and 19.0% of units being vacant. Riverside has largely been a car based destination but it is hoped that the routes to be established within the emerging 'St Anne's Quarter' development will create a more attractive walking and cycling link between Riverside and the city centre.
84. The Magdalen Street, Anglia Square & St Augustine's LDC on the other hand has a relatively low floorspace vacancy rate of 7.0% (up from 6.7% in 2019 but still down from 11.6% in 2018) and 10.8% of units. This is very competitive when compared to the GB national average retail vacancy rate of 15.8%<sup>16</sup>. This centre has repositioned itself as a niche area of speciality/ethnic retailers and restaurants. The low vacancy rates in this area also correspond to the Local Data Companies findings that independents continued to be more resilient than multiples with growth in independents being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (cafes

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<sup>16</sup> Local Data Company, "Looking Beyond Lockdown: GB Retail and Leisure Market Analysis, H1 2021" (September 2021)

and fast food). Independents are also likely to have benefited from government support measures and business rates relief which has enabled them to remain operational.

85. Anglia Square is subject to proposals for comprehensive re-development. A 10 year planning consent has been granted for the area underneath the flyover on Magdalen Street and whilst the application for the redevelopment of Anglia Square was turned down by the Secretary of State in 2020 following a call in, pre application discussions for a revised scheme are underway. If permission is granted, this area may be subject to significant levels of change and regeneration over the coming years.

86. The overall amount of floorspace in A1 retail use has decreased by 445m<sup>2</sup> and there has been a decrease in 3 units in the LDCs since 2018.

87. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 9.3% (compared to retail only of 9.1%) and the percentage of vacant units is 11.6% (compared to retail only of 10.9%).

**Table 8: Large District Centres (Magdalen Street, St Augustine's Street, Anglia Square & Albion Way Riverside)**

<b>Retail floorspace (use class A1)</b>				
	<b>All</b>	<b>Trading</b>	<b>Vacant</b>	<b>Under construction/ refurbishment</b>
<b>July 2021</b>	<b>32,379</b>	<b>29,426</b>	<b>2,932</b>	<b>21</b>
<b>October 2020</b>	<b>32,015</b>	<b>29,974</b>	<b>2,041*</b>	<b>0</b>
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
<b>Retail units (use class A1)</b>				
	<b>All</b>	<b>Trading</b>	<b>Vacant</b>	<b>Under construction/ refurbishment</b>
<b>July 2021</b>	<b>138</b>	<b>123</b>	<b>14</b>	<b>1</b>
<b>October 2020</b>	<b>138</b>	<b>120</b>	<b>18**</b>	<b>0</b>
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><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>	
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%	

\* of which 25 sqm appears to be closed due to COVID (still set up for trading).

\*\* of which 2 appear to be closed due to COVID (still set up for trading).

## Rest of the City Centre

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change
Rest of City Centre (Retail only)	19.2%	13.7%	19.4%	1.2% decrease

88. 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.
89. The vacant available *floorspace* in the rest of the city centre has increased significantly from 5.9% in 2019 to 13.7% and when including refurbishments the vacancy rate now stands at 19.2%. 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. This may suggest that a number of new businesses have struggled to survive during the pandemic.
90. The percentage of vacant retail *units* in the rest of the city centre has more than doubled from 22 units (9.2%) in October 2019 to 25 units (19.4%) in July 2021. Whilst this is a significant increase it is no higher than it was in June 2018.
91. The overall amount of floorspace in A1 retail use has decreased by 167m<sup>2</sup> and reduced by one unit in the 'rest of the city centre' since 2019.
92. These figures suggest that there is a lot of change and turnover in the 'rest of the city centre' area and although a number of new businesses set up in 2018/19 these have either struggled to survive or other more established businesses have unfortunately closed. It may also be the case that some businesses have moved to premises within other retail areas. Overall however it would appear that some of the smaller units are still struggling to find and retain retailers in the lesser known shopping streets which lie outside of the defined areas.
93. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 22.0% (compared to retail only of 19.2%) and the percentage of vacant units is 18.1% (compared to retail only of 19.4%).

**Table 9: Rest of city centre**

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
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
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>	
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%	

\* of which 145 sqm appears to be closed due to COVID (still set up for trading).

\*\* of which 3 appear to be closed due to COVID (still set up for trading).

## District and Local Centres

94. Policy DM21 of the Development management policies plan establishes A1 retail use thresholds of 60% for District Centres and 50% for Local Centres.
95. Vacancy rates in District and Local Centres focus on units only and have increased overall from 8.1% in 2019 to 11.6% in 2021. This follows the trend of increasing vacancy rates within the city; however, 11.6% is significantly lower than the 14.1% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances Local and District Centres are faring quite well. This may suggest that during the pandemic more people shopped locally.
96. Therefore despite the increase in vacancy rates, particularly in Local Centres, it would appear that the District and Local Centres are continuing to perform their function and to offer an appropriate range of local services and facilities.

## District Centres

Headline figures	Vacant units	Retail floorspace change
District Centres	9.8%	1.0% decrease

97. Vacancy rates in the District Centres have increased marginally from 9.7% in 2019 to 9.8% in 2021 but are still significantly lower than they were in 2018 where 11.6% of units within District Centre stood vacant and also significantly lower than the city centre. The total number of vacant units in the 10 District Centres is currently 19 and this has not changed since 2019 (the increase in vacancy rate is as a result of the total number of units decreasing from 196 to 194). In 2018 23 units were vacant.
98. In term of total number of units, there has been an increase in two District Centres – DC04: Plumstead Road and DC07: The Larkman which is a result of units subdividing. Within three centres there has been a reduction in units which are DC03: Eaton Centre, DC09: Hall Road and DC10 Sprowston Road/Shipfield which has been due to units merging or being demolished for redevelopment.
99. The percentage of non-retail units currently stands at 41.8% which is 1% higher than in 2019. In previous years there has actually been a gradual decrease (positive) in non retail units so this is reversal of that trend. Furthermore during the monitoring period there has been a change in the number of District Centres which exceed the 40% non-retail threshold set out in Development Management Policy DM21. In 2019 DC08: Dereham Road/Distillery Square had 35.1% of non-retail units. This has now increased to 40.5% which exceeds the threshold but is still lower than many of the other district centres. Therefore now only two District Centres fall within the threshold which are DC02: Drayton Road and DC06: Earlham House where the percentage of non retail are 26.7% and 20.0% respectively. The district centres which exceed the 40% non-retail threshold set out in Development management policy DM21 are now as follows:

- DC01: Bowthorpe
- DC02: Drayton Road
- DC03: Eaton Centre
- DC04: Plumstead Road
- DC05: Aylsham Road/Mile Cross
- DC07: The Larkman
- DC08: Dereham Road/Distillery Square
- DC09: Hall Road
- DC10: Sprowston Road/Shipfield

100. A number of these centres have non-retail percentages only just over 40%, so in many cases it would just take one or two units changing to retail to satisfy the policy ambition. However, applications locally and patterns nationally over recent years have shown that this is considered to be moving in the opposite direction with an increase in non-retail uses. This is also likely to be exacerbated with greater flexibility to change between any use within the new Class E and there may also be changes to residential as a result of new permitted development rights introduced this year. 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. The next monitoring year may start to show any impacts from changes to the Use Classes Order and Permitted Development Order as well as showing longer term impacts of the pandemic.

101. In terms of the individual District Centres the following is of note:

102. There have been no changes within Bowthorpe district centre DC01 during the monitoring period with an 11.8% vacancy rate. It does still have one of the highest non-retail rates; however there have been no further changes away from A1.

103. In 2019 Drayton Road district centre DC02 had the highest vacancy rate with 20% of units being unoccupied but the number of vacant units has decreased from three to two which reduces the vacancy rate to 13.3%. This is still higher than the average vacancy rate for the 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.

104. In 2018, DC03: Eaton Centre had no vacancies, in 2019 two of the 19 units were vacant and this has now increased to three units along with there being a decrease in the total number of units as a result of redevelopment. This District Centre now has the highest vacancy rate of all district centres as well as the second highest percentage of non retail.

105. DC04: Plumstead Road has performed well over the monitoring period. Vacancy rates have fallen from 16.1% to 9.4%, the total number of units has increased by one and the percentage of non retail has also decreased. DC10:

Sprowston Road/Shipfield has also performed well with a reduction in vacancy rates from 15% to 5.3% and a decrease in the percentage of non retail units.

106. DC05: Aylsham Road/Mile Cross has seen no changes in vacancy rates or total number of units although one unit has changed away from retail which increased the percentage of non retail to 47.6%. A new Lidl opened adjacent to the District Centre a couple of years ago which is just outside of the District Centre boundary (so not counted as a unit within this monitoring report). Currently this would appear to have had little impact upon the centre.
107. 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. In 2018, 15 of the 17 units were occupied, in 2019 all units were full and despite one unit now being vacant, the vacancy rates is still low at only 6.7% and with only 20% of units being non retail this is one of the city's best performing retail centres.
108. There are two district centres which have all of their units occupied which are The Larkman (DC07) and Hall Road (DC09) centres. Hall Road district centre DC09 was regarded as poor performing in both 2016 and 2018. A community centre opened in 2019 and there are currently no vacant units within this centre. 57.1% of the units however are non-retail use.
109. DC08 Dereham Road/Distillery Square is the largest District Centre in terms of shop numbers and this has experienced quite a significant increase in vacancies with four units now being vacant which compares to one in 2019. During the monitoring period two units also change from retail to non retail which now means that the 40% non retail threshold has been exceeded.

**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	2	11.8%	8	47.1%
DC02	Drayton Road	15	2	13.3%	4	26.7%
DC03	Eaton Centre	17	3	17.6%	9	52.9%
DC04	Plumstead Road	32	3	9.4%	14	43.8%
DC05	Aylsham Road/ Mile Cross	21	3	14.3%	10	47.6%
DC06	Earlham House	15	1	6.7%	3	20.0%
DC07	The Larkman	14	0	0.0%	6	42.9%
DC08	Dereham Road/ Distillery Square	37	4	10.8%	15	40.5%
DC09	Hall Road	7	0	0.0%	4	57.1%
DC10	Sprowston Road/ Shipfield	19	1	5.3%	8	42.1%
<b>TOTAL</b>		<b>194</b>	<b>19</b>	<b>9.8%</b>	<b>81</b>	<b>41.8%</b>

**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	Retail floorspace change
Local Centres	12.7%	0.3% increase

110. Table 11 shows vacancy rates and percentage of non-retail units for the 28 local centres.

111. Of the 324 units, the number of vacant units is 41, representing an increased vacancy rate of 12.7% in 2021 compared to the 2019 figure of 7.1%. This is significantly higher than in previous years; however is still lower than the city centre. In 2019 half of the local centres were fully occupied (14 out of 28) but now this is only 10. There has however been an increase of 1 no. unit since 2019.

112. Improvements in vacancies since 2019 have taken place in LC06 Unthank Road, LC07 St Augustine's Gate, LC09 Aylsham Road/Junction Road, LC11 Aylsham Road/Boundary Road and LC15 Sprowston Road/Silver Road. The local centres which have had increased vacancies during the monitoring period are LC01 Hall Road/Trafalgar Street, LC02 Hall Road/Queens Road, LC10 Aylsham Road/Glenmore Gardens, LC13 Catton Grove Road/Ring Road, LC14 Magdalen Road, LC18 Earlham West Centre, LC19 Colman Road/The Avenues, LC29 UEA, LC29 Aylsham Road/Copenhagen Way and LC30 St Stephens Road. There is a significant disparity in vacancy rates with 10 local centres having no empty units whereas the worst performing local centre (LC19 Colman Road/The Avenues) having nearly a third of units vacant.

113. The percentage of non-retail units across all of the centres is 46.0% up from 45.2% in 2019 and 2018. Whilst there has been an increase in the percentage of non retail, this average figure remains comfortably below the 50% threshold. 15 of the 28 centres have a proportion of A1 retail units above the 50% policy target and are policy compliant, four sit at the recommended 50% threshold and nine are below the threshold and are not policy compliant. The nine local centres that have exceeded the DM21 policy threshold and have greater than 50% non-retail uses are listed below. The three centres that have been added to this list since 2019 are LC02, LC10 and LC20.

- LC02: Hall Road/Queens Road
- LC06: Unthank Road;
- LC07: St Augustine's Gate;
- LC10: Aylsham Road/Glenmore Gardens
- LC12: Woodcock Road;

- LC15: Sprowston Road/Silver Road
  - LC20: Colman Road, The Parade
  - LC26: UEA; and
  - LC29: Aylsham Road/Copenhagen Way.
114. The following local centres are recorded as having 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:
- LC11: Aylsham Road/Boundary Road
  - LC14: Magdalen Road
  - LC17: Bishop Bridge Road
  - LC28: Magdalen Road/Clarke Road

**Table 11: Local Centres<sup>17</sup> 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	7	3	42.9%		1	14.3%	
LC02	Hall Road/ Queens Road	28	8	28.6%		15	53.6%	
LC03	Hall Road/ Southwell Road	7	0	0.0%		3	42.9%	
LC04	Grove Road	14	1	7.1%		5	35.7%	
LC05	Suffolk Square	9	0	0.0%		4	44.4%	
LC06	Unthank Road	43	3	7.0%		23	53.5%	
LC07	St Augustine's Gate	8	1	12.5%		6	75.0%	
LC08	See footnote							
LC09	Aylsham Road/ Junction Road	8	1	12.5%		1	12.5%	
LC10	Aylsham Road/ Glenmore Gardens	13	1	7.7%		7	53.8%	
LC11	Aylsham Road/ Boundary Road	12	1	8.3%		6	50.0%	
LC12	Woodcock Road	7	0	0.0%		4	57.1%	
LC13	Catton Grove Road/Ring Road	12	2	16.7%		4	33.3%	
LC14	Magdalen Road	14	3	21.4%		7	50.0%	

<sup>17</sup> 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. They are listed in table 7 above. 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 6.

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC15	Sprowston Road/ Silver Road	8	0	0.0%		5	62.5%	
LC16	See footnote							
LC17	Bishop Bridge Road	8	0	0.0%		4	50.0%	
LC18	Earlham West Centre	22	4	18.2%		10	45.5%	
LC19	Colman Road/ The Avenues	16	5	31.3%		4	25.0%	
LC20	Colman Road, The Parade	11	1	9.1%		6	54.5%	
LC21	Woodgrove Parade	9	0	0.0%		3	33.3%	
LC22	St John's Close/ Hall Road	11	0	0.0%		3	27.3%	
LC23	Tuckswood centre	5	0	0.0%		1	20.0%	
LC24	Witard Road, Heartsease	9	1	11.1%		3	33.3%	
LC25	Clancy Road, Heartsease	5	1	20.0%		2	40.0%	
LC26	UEA	9	2	22.2%		7	77.8%	
LC27	Long John Hill	5	0	0.0%		1	20.0%	
LC28	Magdalen Road/ Clarke Road	8	0	0.0%		4	50.0%	
LC29	Aylsham Road/ Copenhagen Way	5	1	20.0%		4	80.0%	
LC30	St Stephens Road	11	2	18.2%		6	54.5%	
<b>TOTAL</b>		<b>324</b>	<b>41</b>	<b>12.7%</b>		<b>149</b>	<b>46.0%</b>	

### 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



## Retail Warehouse and Norwich's out of town retail

115. This monitoring report has never previously reported on Norwich's out of town retail provision and whilst a comprehensive survey has not been undertaken, it is felt that it would be useful to provide some form of indication as to how these areas are performing and to report on changes that have and are taking place.
116. In the past Norwich City Council has previously resisted out of town retail where there are sequentially preferable sites, where it can be demonstrated that proposals will have a detrimental impact upon our high street or where the proposal does not involve bulky goods. It is felt that this has contributed to the success of the city centre.
117. However over the past decade there has been a significant growth in out of town retailing, particularly in South Norfolk and Broadland with new comparison goods shops opening as well as a significant growth in the number of supermarkets and fast food outlets. Furthermore there has been a significant change in the nature of several of Norwich's employment areas and not only have a lot of DIY trade counters for instance opened, another noticeable change is the number of leisure uses that are now on employment sites. These have often been justified in these largely car dependent locations due to a lack of suitable available sites in more sustainable places and due to the need for a warehouse style building with a large floor area and high ceilings.
118. In terms of vacancies, as already reported, the Cathedral Retail Park in Norwich and Riverside both have empty shops. However the retail parks on the edge of Norwich seem to be performing better. Sprowston Retail Park and Hall Road Retail Park for example currently have no vacant units.
119. In terms of the future, it is likely that more warehouse units will be used for leisure, retail and other town centres uses as units that are currently in use as light industrial can now change to any other use within Class E without the need for planning permission. This means there will no longer be a requirement to undertake a sequential test or impact assessment. There is therefore concern that some city centre retailer may choose to migrate to out of centre locations which may have cheaper rents and are easy to access by car which could have a detrimental impact upon Norwich's city centre.

## Conclusions

120. Retail vacancy rates have rising significantly since October 2019 and as shown in table 12 rates have increased in all city centre areas as well as within the District and Local Centres. This is unsurprising given the challenging circumstances faced by retailers and given that there have been three lockdowns when all shops and leisure facilities have been forced to close other than essential retail. Furthermore for much of the period footfall within the city centre has been extremely low partly due to the 'work at home' message and also due to people choosing to either shop locally or turning to online retailing.
121. Many shops have managed to reopen following lockdowns but despite there being business rate relief and other government support many shops have been unable to survive the impact of the pandemic. In particular Norwich has lost a significantly high number of multiples over the monitoring period and a number of these such as Debenhams and Topshop previously occupied large and prominent locations. Notwithstanding this it would appear that many of Norwich's independent retailers have been performing well and this can be shown by the low 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 vacancy rates are only 6.7% and 7.0% which is extremely low when compared to a national average retail vacancy rate of 15.8%. 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.
122. For the first time, this report 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 when other town centre uses are taken into account.
123. In terms of the total amount of retail floorspace within the city centre, whilst it continues to decrease, the rate has slowed and during this monitoring period there has only been a reduction of 1,534m<sup>2</sup> (0.7%) which is considerably less than that which was lost in 2018/19 where retail floorspace decreased by 6,231 m<sup>2</sup> (2.7%). 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.
124. All of the retail frontages in the Primary area remain within the recommended minimum percentage of A1 use as set out in the 'Main Town Centre Uses and Retail Frontages' Supplementary Planning Document (2014). There have not been any significant changes since 2019 although levels of non-retail have crept up in five of the seven zones. However in PR02: The Lanes east retail levels have continued to increased and in PR06: Timberhill/Red Lion Street there has been no change. In terms of the secondary area retail frontage zones one out of three (SR03: St Benedicts) is below the minimum threshold;

however during the monitoring period the proportion of retail has actually increased in all three frontage zones and overall the retail frontages appear relatively healthy.

125. Vacancy rates in District and Local Centres have increased overall from 8.1% in 2019 to 11.6% in 2021. This follows the trend of increasing vacancy rates within the city; however, 11.6% is significantly lower than the 14.1% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances local and district centres are faring quite well. This may suggest that during the pandemic more people shopped locally.
126. 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 the past 18 months have been even more challenging as a result of the COVID pandemic. These challenges are likely to have an ongoing impacts for the viability of some retail businesses.
127. It is however encouraging that footfall has significantly increased following the lifting of restrictions. With the majority of people now having received their COVID vaccine it is hoped that confidence will continue to build and people will start to use the high street in a similar way than they did before the pandemic. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving. 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.
128. It is however 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 a number of 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 monitor change over the coming few years.

Notwithstanding the above, despite a reduction in retail floorspace and an increase in vacancy rates, given the circumstances Norwich has demonstrated that it remains relatively robust and is still a thriving retail centre in the East of England. To continue this relative success, the council may need to identify other ways to influence and cultivate the retail offer of Norwich

given the potential challenges faced, 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 2019**

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

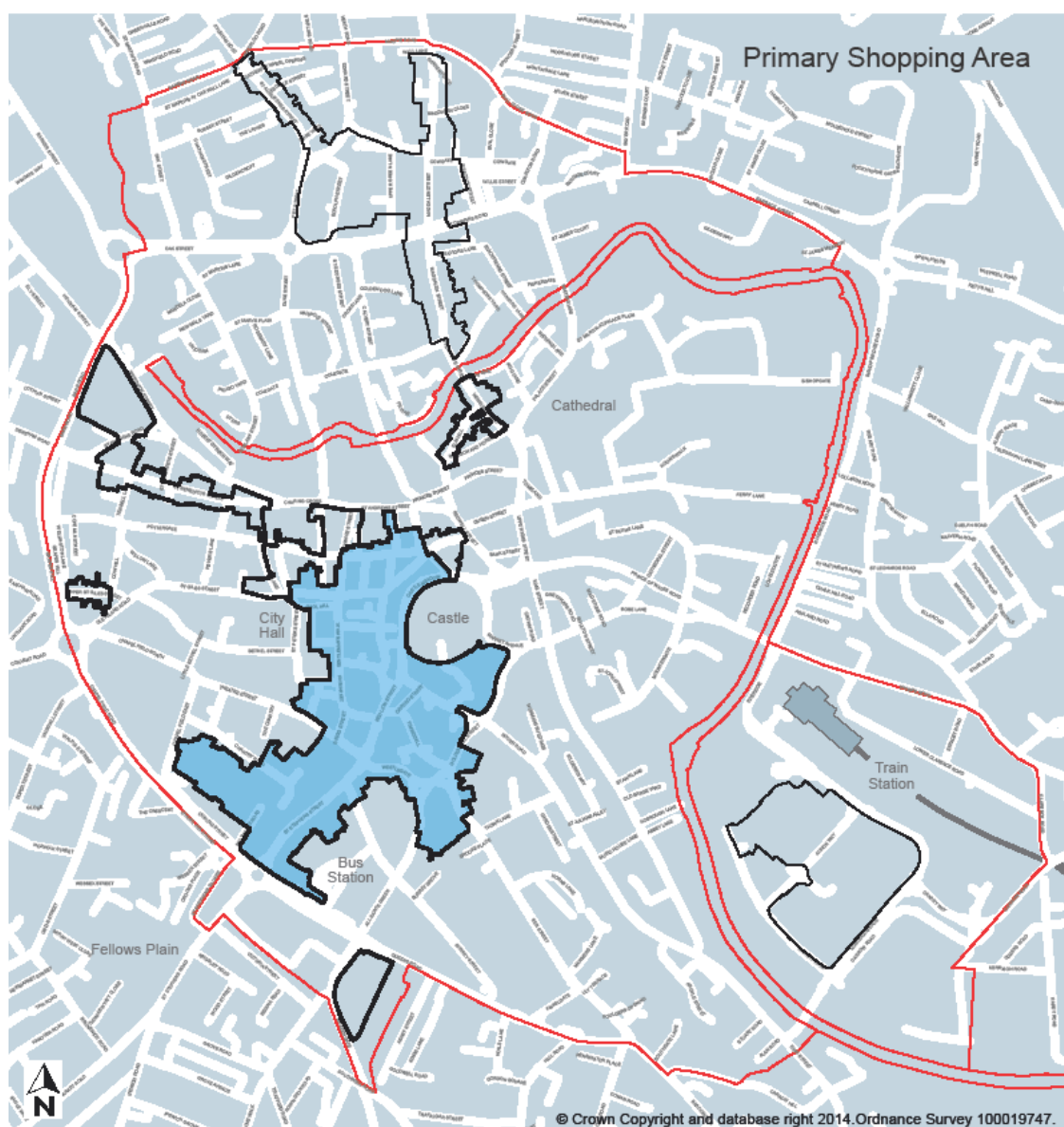
Red = Moving in a negative direction

Green = Moving in a positive direction

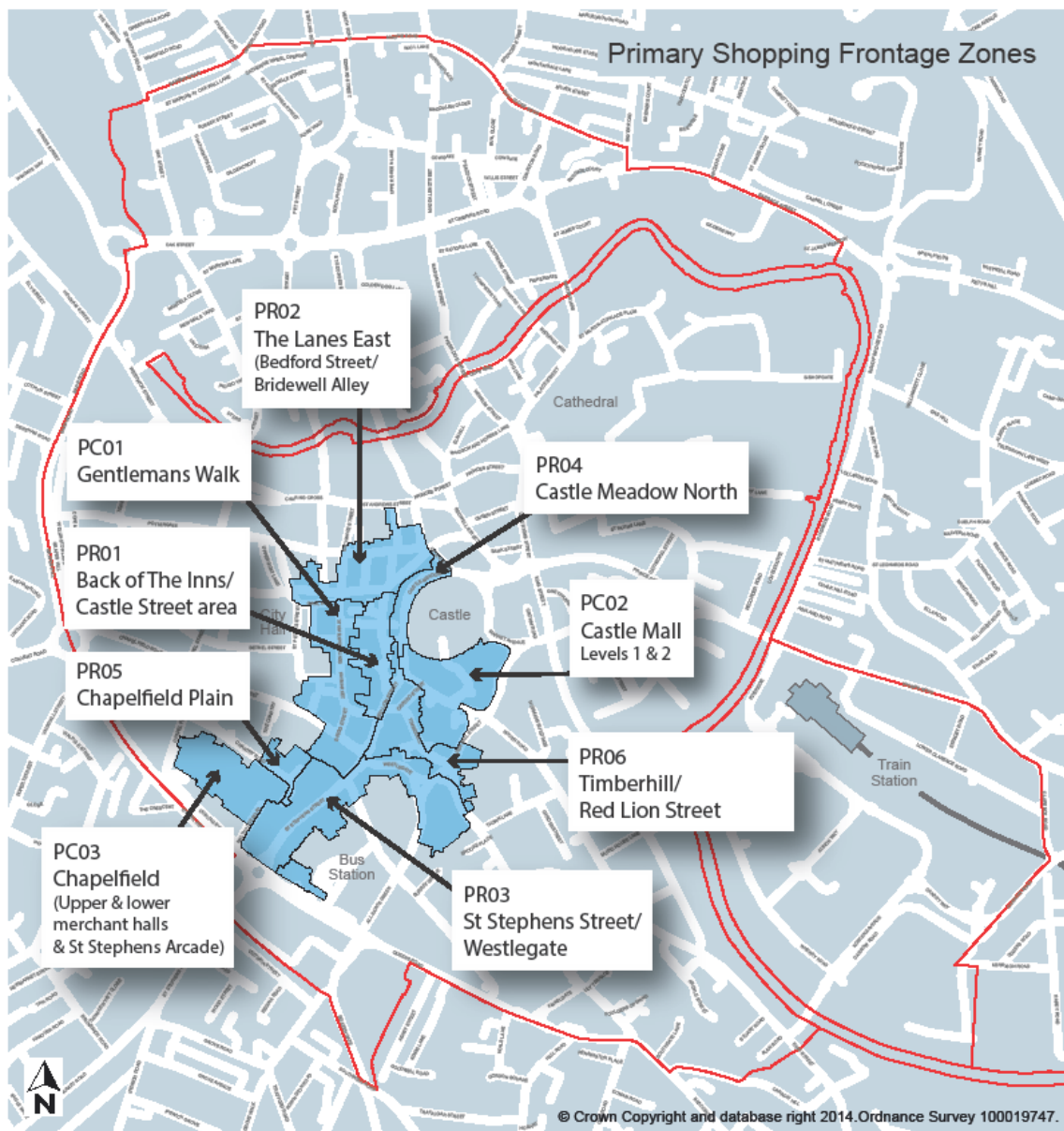
Grey = No change

## Supporting Maps

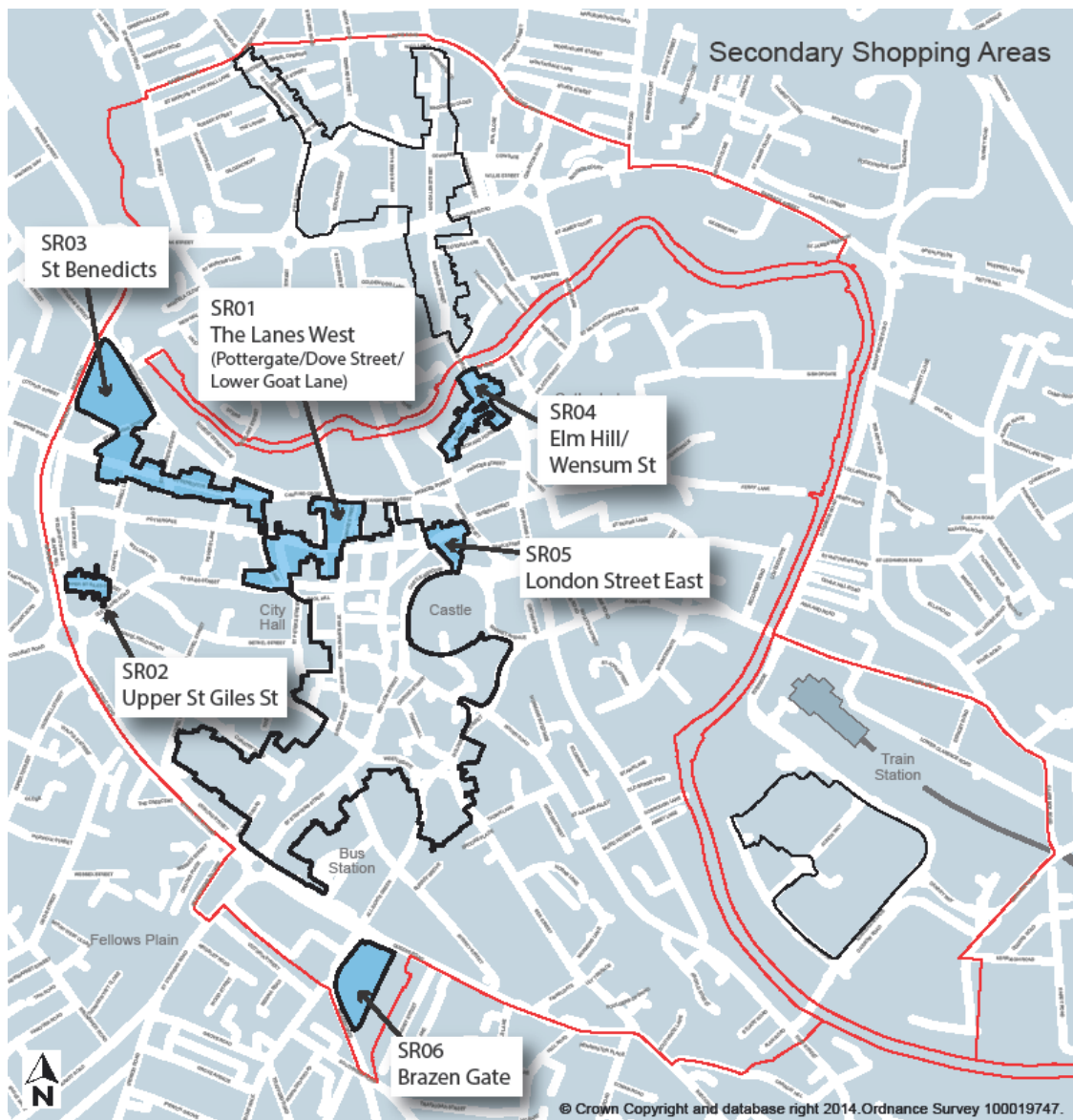
Map 1: Primary shopping area



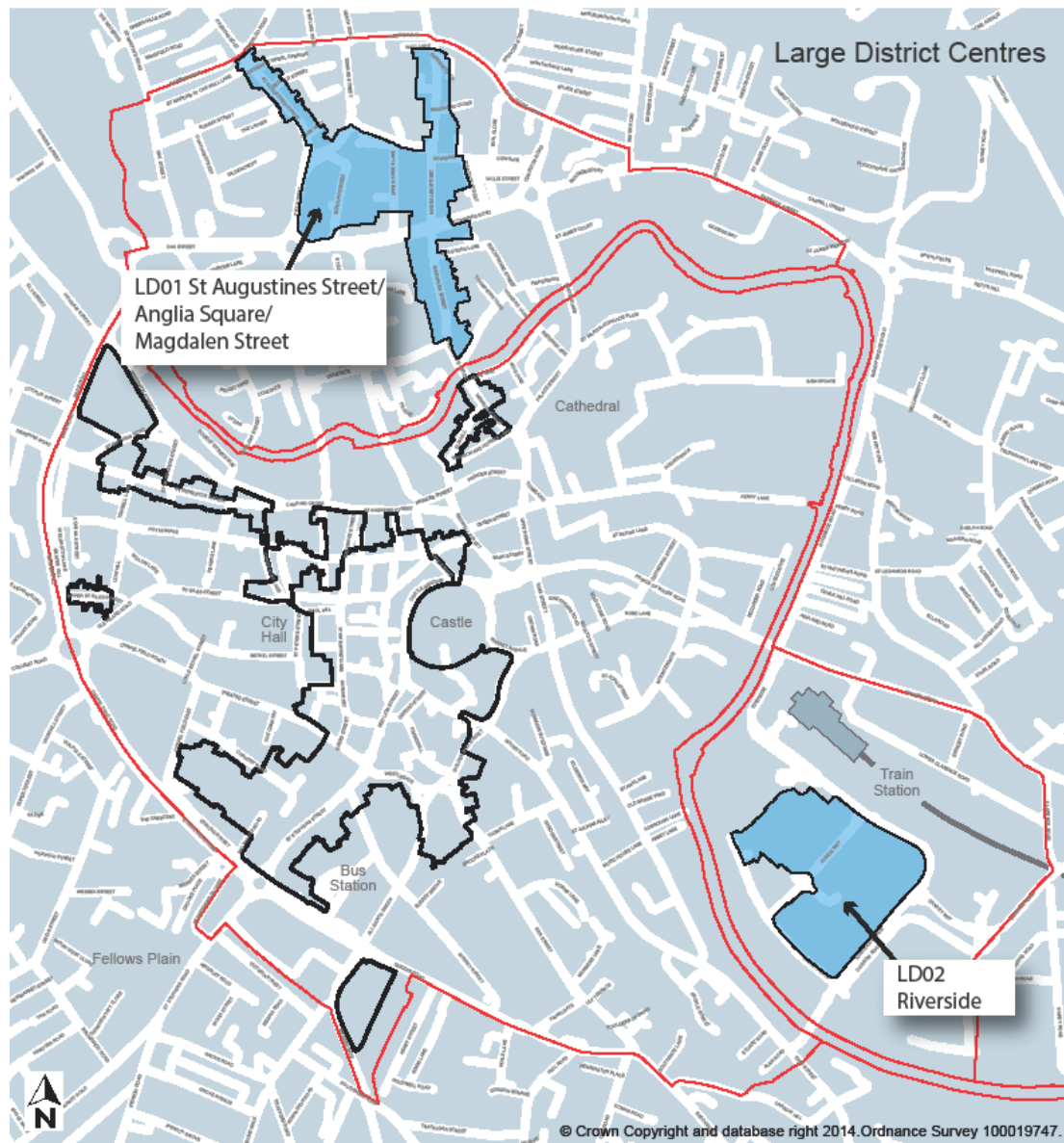
**Map 2: Primary area frontage zones**



**Map 3: Secondary shopping areas**



**Map 4: Large district centres (Magdalen Street, Anglia Square, St Augustine's Street & Riverside)**



## Contact Information

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**Committee Name: Sustainable development panel**

**Committee Date: 16/11/2021**

**Report Title: Article 4 Direction to Remove Permitted Development Rights for the Conversion of Offices to Residential**

**Portfolio:** Councillor Stonard, Cabinet member for inclusive and sustainable growth

**Report from:** Head of planning and regulatory services

**Wards:** Mancroft, Lakenham, Town Close, Thorpe Hamlet

**OPEN PUBLIC ITEM**

**Purpose**

To update members on the introduction of an article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre and to feedback on the recent consultation.

**Recommendation:**

To recommend to cabinet that the council proceeds with the introduction of a non-immediate Article 4 direction and that the Article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre is confirmed.

**Policy Framework**

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets all three corporate priorities.

This report helps to implement the local plan for the city.

This report helps to meet the business and the local economy objective of the COVID-19 Recovery Plan

## Report Details

1. On 22 June 2021 a [report](#) was presented to this panel recommending that the council proceeds with the introduction of a non-immediate Article 4 Direction which if successfully introduced will mean that full planning permission is required to change offices to residential within the city centre. Members unanimously voted in favour of recommending to cabinet that the council proceeds.
2. Following this a [report](#) went to cabinet on 7 July 2021 and cabinet resolved to recommend that the council proceeds with the introduction of a non-immediate Article 4 Direction and that delegated authority is given to the executive director of development and city services, in consultation with the portfolio holder, to make an Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre.
3. The council subsequently made the Direction on 28 July 2021 and started the consultation process which included press and site notices, placing copies of the notice in the Millennium Library, placing documents on the [Council's website](#) and notifying Norfolk County Council. The Secretary of State for Ministry and Housing, Communities and Local Government (now renamed the Department for Levelling Up, Housing and Communities) was also notified that the council had made a Direction.
4. The six week consultation period ended on 9 September. In total 14 people responded to the consultation and as expected the response was mixed. Seven respondents supported the introduction of the Article 4 Direction, whilst the remaining seven either objected or provided comments including suggesting how the Article 4 Direction could be amended. A summary of each response is set out in appendix 1. The main issues raised through the consultation are as follows:
  - (a) The council needs more control as some converted offices have not provided high quality housing.
  - (b) Office to residential conversions damage the long term health of the city centre.
  - (c) Permitted development rights undermines the ability for LPAs to plan effectively.
  - (d) Less office space is likely to be needed in the future especially with more home working.
  - (e) More homes and leisure facilities are needed which could use vacant office space.
  - (f) It is important to encourage more people back into the offices so they can support retailers and food businesses.
  - (g) Previous conversions have done little to address affordable housing issues.

- (h) Offices are better on the outskirts as there are many negatives of having offices in the city centre.
  - (i) This proposal is not joined up with the proposed congestion charge for Norwich.
  - (j) It is best to leave the property market to its own devices.
  - (k) Conversions to residential and educational uses have provided a solution for obsolete office buildings.
  - (l) Office to residential conversions have increased the city centre population and boosted the supply of residential properties.
  - (m) Changes to permitted development rights (i.e. now having a size threshold) will protect larger, purpose-built modern office buildings.
  - (n) The NPPF sets out that article 4 Directions should apply to the smallest geographical area. The extent of the article 4 direction should be reviewed to ensure that it complies with the NPPF and so it is much more targeted.
5. It is important that we take these comments into account when deciding whether to confirm the Direction and bring it into force. A number of important issues have been raised through the consultation and whilst there is a lot of support for the article 4 Direction, some people that feel that there will be a surplus of office accommodation and residential is a good use for this. The Council's response to this is that we are not opposed to office to residential conversions per se, and the Direction will not prevent all offices changing to residential. Instead it will enable the council to manage it and to consider all material planning considerations including the impact that the loss of offices will have upon our economy as well as ensuring that housing is of good quality. Furthermore in terms of the geographical area, we have drawn the direction tightly around the city centre, rather than including a large proportion of the authority area. Whilst it does extend beyond the essential core of the primary shopping area, it is felt that this is necessary as many of Norwich's strategic offices fall outside of this area. The advice received from [Ramidus](#)<sup>1</sup> is that virtually any site that is not secured on a long lease could be considered under pressure for redevelopment as residential. The evidence base proposed the A147 (Norwich Inner Ring Road) as the main boundary to an Article 4 Direction with extensions to encompass key business spaces around Carrow Road and Thorpe Road. This boundary will ensure that all space of strategic value can be protected but will allow truly redundant stock within the centre to be converted under a full planning application or will allow offices in more peripheral locations to be converted under prior approval. It is therefore the officer's view that no issues have been raised through the consultation process that should prevent the Council from introducing the Direction.
6. The Secretary of State wrote to the council on 8 September to say that they were considering whether to use their powers of intervention and invited the

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<sup>1</sup> A review of Office Accommodation in Norwich, Ramidus Consulting Limited, July 2020

council to submit further evidence and to set out how the Direction fulfils national policy. Whilst the council felt that a clear justification for introducing the Direction is set out on our website, we welcomed the invitation to submit further evidence and we wrote to the Secretary of State on 16 September setting out how the Direction accords with the National Planning Policy Framework and further justifying why the Direction is so important to Norwich's economy as well as how it ties in with the council's wider vision and objectives and some of the other projects that are going on within the council.

7. We are still awaiting confirmation from the Secretary of State as to whether they will use their powers of intervention; however, officers at the National Planning Casework Unit have confirmed that their consideration does not stop our Article 4 Direction process so at this point in time we can still proceed with bringing it into force. There is still however a risk that the Direction could fail.
8. Notwithstanding this risk, it is felt that the council has a compelling case for introducing the Article 4 Direction and therefore it is felt that based on the current advice from the National Planning Casework Unit that there is no reason why the council cannot proceed with confirming the Direction. Therefore it is proposed that a report is taken to cabinet on 8 December 2021 recommending that the direction is confirmed and then brought into force on 29 July 2022. The direction cannot be brought into force any earlier than this due to the need to give 12 months' notice from the date of making the direction in order for the council to avoid compensation claims.
9. If the Secretary of State does choose to use their power of intervention then work will have to cease on the introduction of the Article 4 Direction and the council will have to review whether there are any other options for proceeding (i.e. reviewing the geographical area). If this decision was received prior to the cabinet meeting in December then the item would need to be pulled from the agenda.

## **Consultation**

10. Responses to the consultation are set out in paragraph 4 and also summarised in Appendix 1.
11. The portfolio holder has been briefed and has advised that we proceed.

## **Implications**

### **Financial and Resources**

12. 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 2019-22 and Budget.
13. There will be a financial cost associated with the required publicity for introducing an Article 4 direction. It is expected that this will be met from existing budgets. The Ramidus study was funded through Towns Deal funding. Giving 12 months notice of bring the direction into force will avoid any compensation claims.

## Legal

14. Legal advice has been sought through the process. Once brought into force, the Direction will need to be registered as a land charge.

## Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	The LPA is not able to secure affordable housing under prior approval applications. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and come into force, the Article 4 direction will enable the LPA to secure affordable housing where it is viable.
Health, Social and Economic Impact	<p>The size and quality of flats delivered through permitted development rights have often been substandard as they are not of sufficient size or provide sufficient natural light or external amenity space to provide a good quality of life for future residents. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and come into force, removing permitted development rights will enable the LPA to have more controlled over internal and external amenity for future residents for example through requiring flats to meet national space standards.</p> <p>There has been an uncontrolled loss of office accommodation within Norwich since the introduction of permitted development to convert offices to residential and it has been identified within a recent study that Norwich's office economy is in a fragile and vulnerable condition. The impact of this report to make an article 4 direction protecting Norwich's office economy will not have any direct impacts but, once the direction is confirmed and come into force, this will enable the LPA to consider whether the loss of an office building within the city centre is acceptable on a case by case basis. This will allow stock that is truly redundant to change use while, on the other hand, being able to protect space of strategic value. This therefore has the potential to have a positive impact on economic development.</p>
Crime and Disorder	Neutral impact
Children and Adults Safeguarding	Neutral impact

<b>Consideration</b>	<b>Details of any implications and proposed measures to address:</b>
Environmental Impact	<p>Under prior approval applications no physical alterations can be made to the building. If required these come forward as a separate application. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and come into force, having one planning application for the change of use and physical alterations will enable the LPA to better consider the impacts of the development in order to ensure that the proposal enhances the built environment. It will also enable the LPA to secure landscaping via a condition which will have a positive upon both the natural and built environment.</p> <p>Under prior approval applications the LPA is not able to require 10% of energy to be from decentralised and renewable or low carbon energy sources. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and come into force, the Article 4 direction will enable the LPA to consider energy for all sites of 10 or more dwellings.</p>

### **Risk Management**

<b>Risk</b>	<b>Consequence</b>	<b>Controls Required</b>
Given that the Secretary of State has not yet made a decision on whether to intervene there is a risk that the article 4 direction may fail.	<p>Given that the majority of work has already been done, the further financial resource implications are relatively minimal.</p> <p>Publicising the fact that the Council intends to bring the article 4 direction into force could lead to a temporary increase in prior approval applications.</p>	Our case is supported by overwhelming evidence and is geographically limited. The National Planning Casework Unit has advised that their consideration of the Direction does not mean that progress on its introduction should be delayed. For this reason it is considered best to proceed at this point in time.

### **Other Options Considered**

- The alternative option is to not introduce an article 4 direction. This option is not recommended as it would prevent the Council from having any future control over the conversion of offices to residential through permitted development rights.

**Reasons for the decision/recommendation**

16. It is felt that our case is supported by overwhelming evidence and the Article 4 Direction will help project Norwich's office economy.

**Background papers:** None

**Appendices:** Consultation responses

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## Appendix 1: Summary of comments received on Article 4 Direction

	Support/Object/ Comment	Comments
1	Support	Agree council needs more control so supports new powers; however need to acknowledge that less office space will be needed in future due to more people working from home.
2	Comment	More offices should be allowed to change to residential. There is a need for residential above retail and the tourist and leisure industry could fill the gap left by office workers. Offices are better on outskirts as cheaper and within walking distance of thousands. Knock on effect of less commuting and better air pollution would also follow.
3	Object	Norwich is also proposing introducing a workplace parking levy and congestion charge along with everything else under the Transport for Norwich banner which restricts access to the city centre by car. This is not joined up thinking. Why would people want to work in city centre offices when there are so many negatives compared to locations where there are fewer restrictions and lower business rates?
4	Support	Some offices already converted do not appear to provide high quality housing. The analyses presented is correct including the significant points regarding the facilities needed by SMEs. The analysis is also correct in identifying key differences regarding walking to work and other points which make Norwich different to other cities. The A4D will give the city the option to refine office conversions.
5	Support	Accommodation created by conversions is often poor quality. Not opposed to office to resi conversion per-se. Cities do need to adapt to survive but these powers will ensure that future attempts to create residential accommodation out of redundant office buildings are put to proper and robust scrutiny with the result of creating future housing that stands the test of time and provides exceptional level of comfort and amenity to future residents.
6	Object	It doesn't feel like a consultation given the Direction has already been made. In the absence of a coherent strategy for the centre of Norwich, it would be best to leave the property market to its own devices. Norwich has too much office space given the decrease in need for office space as a result of the pandemic. Need to increase supply of housing.
7	Comment	The demand for office space will be reduced for the foreseeable future, while there is a shortfall of housing, particularly affordable housing. Therefore I see no problem with allowing the continued transformation of offices into residential. If the Council nevertheless

	Support/Object/ Comment	Comments
		wishes to continue down the route of requiring full planning permission for conversions, I hope decisions will bear this new trend of new home working in mind as life will not return completely to normal when the pandemic is over.
8	Support	Permitted development rights to allow office to residential conversions undermines the ability for LPAs to plan effectively. The proposed area makes sense as it is the city centre retail and office district. The area beyond the city centre ring road includes key office buildings but would not object to these offices being excluded from the Article 4 area. Office to residential conversions make business sense to owners but it is damaging to the long term health of the city centre economy and ultimately city centre vitality if left unchecked. Control is necessary to ensure that the city's vibrancy can be maintained. The city centre needs more residential as this would support the retail and leisure uses but it is often the buildings most suited to office that are easier to convert rather than the long-term empty ones. There will be a need for the Council to review its policy in relating to residential conversion in light of this article 4 direction. Having more control will allow the city to positively plan, will allow for appropriate office to residential conversions to be scrutinised and allow the council to resist inappropriate development that undermines the Council's aims.
9	Support	Norwich has experienced significant loss of office space over recent years and there is a need for suitable facilities when people return to the office. Not everyone likes home working and decent office accommodation would allow social interaction.
10	Comment	I understand the need to limit PD rights to some extent and to some areas of the city centre but my view is that the article 4 direction goes directly against paragraph 53 of the NPPF which sets out that it should not extend to the whole of the town centre and should apply to the smallest geographical area possible. The Council should reassess the extent of the proposed Article 4 direction to ensure that it complies with the requirements set out in the NPPF.
11	Support	Share concerns regarding the lack of office space within the city centre. Over the past 18 months a number of high street stores have left the city and I am concerned that a further reduction in the presence of office workers in the city centre could lead to more problems for retailers and food businesses in the city centre that rely on the custom of these workers. Furthermore many of the conversions have done little to address housing affordability and has instead

	Support/Object/ Comment	Comments
		encouraged developers to be even more unscrupulous in their pursuit of profit. The Council can look at wider issues when planning permission is required.
12	Support	The need and justification to help maintain Norwich's supply of commercial floorspace is set out. The Theatres Trust is concerned about the potentially negative impact that permitted development may have on theatres and other noise-generating cultural facilities where neighbouring and nearby buildings are converted. There are a number of theatres and performance venues that fall within the published boundary. These meet local cultural needs as well as attracting visitors to the city from a wider area, therefore supporting the well-being of local people and significantly contributing to the local economy. It is important that they are supported and protected.
13 &14	Comment	The Ramidus report appears to consider the Norwich City Council area in isolation rather than the broader 'Greater Norwich' area. The reference to 'market failure' is not appropriate if the entire Norwich area is considered, in view of the successful business park developments outside the city's boundaries. Concentration on the conversion of offices to residential overlooks a significant number of conversions to educational use which have boosted employment. Conversion to both residential and educational uses have provided a solution for obsolete office buildings which are no longer viable for office use. Permitted development has led to the loss of some potentially viable office buildings and it could be argued that earlier intervention, seeking to protect larger, purpose-built modern office buildings might have been appropriate. However this has now been addressed by the recent changes whereby permitted development does not apply to buildings in excess of 1,500 m2. On balance, the impact of the existing pd rights has been positive as it has brought unviable offices into a viable alternative use, it has boosted the supply of residential properties, increased the population in the city centre and has brought about a more balanced office market. The stock and supply of offices in Greater Norwich remains reasonable and capable of accommodating future needs particularly in light of the impact of Covid on office occupancy. With the challenges facing the retail, leisure and office property markets as a result of Covid more flexibility is required. The proposed denial of planning rights to the owners of smaller properties is inequitable. If the Council proceeds with the Article 4 direction it should be more targeted to appropriate buildings. It should be

	<b>Support/Object/ Comment</b>	<b>Comments</b>
		limited to properties within the inner ring road (with the exception of Norvic House and Victoria House). It should not apply to properties near Rosary Road, Thorpe Road, King Street and Carrow Road. It should only apply to purpose-built offices and there should be a minimum size restriction so it doesn't apply to buildings of less than 500 sq m.

