



Sustainable development panel

Date: Tuesday, 10 January 2023

Time: 16:00

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

Committee members: Councillors:

Stonard (chair)
Hampton (vice chair)
Carlo
Giles
Grahame
Lubbock
Oliver
Osborn
Padda

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Agenda

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1 **Apologies**

To receive apologies for absence

2 **Declarations of interest**

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

3 **Minutes**

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To approve the accuracy of the minutes of the meeting held on 15 November 2022

4 **Local Development Scheme Update 2023**

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Purpose - To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents, which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a two-year period to 2025.

5 **Retail Monitor**

39 - 98

Purpose - To report and discuss the findings of the October 2022 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.

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

Date of publication: **Friday, 23 December 2022**



Sustainable Development Panel

16:00 to 17:05

15 November 2022

Present: Councillors Hampton (vice chair in the chair), Carlo, Giles, Lubbock, Oliver, Schmierer (substitute for Councillor Osborn), Padda and Stutely (substitute for Councillor Stonard)

Apologies: Councillors Stonard (chair) and Osborn

1. Declarations of Interest

None.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meetings held on 14 June 2022, subject to amending the list present and item 2 to accurately record that Councillor Hampton was appointed as vice chair.

3. 2020/21 Annual Monitoring Report

The planner presented the covering report and explained that the publication of the Greater Norwich Development Partnership Annual Monitoring Report (AMR) 2020/21 was later than usual due to staff resources being focused on the preparation of and involvement in the Greater Norwich Local Plan (GNLP) and due to the impact of the pandemic. The full AMR was available on the Greater Norwich Development Partnership's website. The AMR was usually published in the autumn following the year end the previous March. Due to the delay and preparation for the GNLP, the 2021/22 AMR had also been delayed. Policies adopted under the GNLP would be subject to monitoring and gaps in data collection would be addressed.

Discussion ensued on the ability to demonstrate the five-year land supply, noting that this was subject to change year on year and was based on the information at the time. Members commented on the provision of 184 affordable housing units and were advised by officers that this was a historic low. In reply to a member's question the planning policy team leader advised members that the Affordable Housing Supplementary Planning Document (SPD) would provide more detail on assessment for affordable housing viability and methodology used.

Members commented on the data and made suggestions where they considered it could be improved. Members were advised that data was collated from a variety of sources, and in partnership with South Norfolk, Broadland and Norfolk County Council. A member suggested that it would be more useful to measure black bin waste (refuse) to monitor whether it was being reduced as a percentage of all waste collected rather than as tonnage. Councillor Oliver, cabinet member for

environment, said that there had been campaigns to ensure that residents knew which bin to use to reduce waste. A member expressed her view that the transport performance indicators were not adequate and referred to new road infrastructure.

Discussion ensued on the monitoring of water quality and that figure had remained static at 4 per cent for a couple of years. It was considered that the Environment Agency might not have provided figures for that period. A member expressed her regret that better monitoring of river water quality could have avoided the current situation where local planning authorities were unable to determine new planning applications for development due to Nutrient Neutrality. The council worked in partnership with other authorities on the Broadland Futures Initiative, Water Resource East and the River Wensum Strategy and this would inform the use of indicators. Members considered that the indicator for the state of the rivers, as set out in Table 3.28 should continue to be strengthened and monitored but there should be greater responsibility on developers, to monitor the impact of development on rivers through their environmental impact assessments. Officers advised the panel that the GNLP partner authorities were responsible for monitoring of the local planning policies for the AMR and assured members monitoring of river water quality would be improved. The AMR noted the performance of the local plans in place at a moment in time. Members would be briefed on proposals to address Nutrient Neutrality before cabinet met in December 2022¹.

In reply to a member's question, the planner said that the 2021 Census data had not been available from the Office of National Statistics in time for the 2020/21 AMR but would be used in the future years'.

During discussion members were reminded of the terms of reference of this panel and that this was a report for information. The cabinet members and officers would feedback concerns that members had expressed about the data and information, if considered appropriate, to inform indicators for the monitoring of the GNLP policies going forward.

RESOLVED to:

- (1) note the contents of the 2020/21 Greater Norwich Development Partnership Annual Monitoring Report;
- (2) ask the committee officer to share slides from the informal planning applications committee meeting on 10 November 2022 on Affordable Housing with members of the panel.

4. Article 4 Direction to remove permitted development rights for the conversion of offices to residential

The planning policy team leader presented the report on behalf of the planner (report author). She explained the background to the report and the work undertaken. The revised Article 4 Direction was more targeted. Anglia Square and Capitol House, on Heigham Street, remain outside the proposed Article 4 Direction area."

¹ The session on Nutrient Neutrality was subsequently postponed to January to consider a proposal for a long term solution in advance of the January meeting of cabinet.

Anglia Square and Capitol House, near Barn Road were now outside the scope of the proposal. She answered questions on the protection of office floor space as set out in paragraph 16. A modification to the GNLP had been proposed to take into account that the Article 4 Direction would be targeted and include a clause permitting a change of use where it could be demonstrated that the loss of the office accommodation was not detrimental to the local economy.

Members welcomed the proposal and praised the officers, consultants and Councillor Davis, for their work in bringing forward this proposal. Members had been concerned about unregulated office conversions, resulting in poor standard accommodation.

RESOLVED to recommend to cabinet on 14 December 2022 that the council formally asks the Secretary of State for Levelling Up, Housing and Communities to modify the proposed non-immediate Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre.

CHAIR



Committee name: Sustainable development panel

Committee date: 10/01/2023

Report title: Local Development Scheme update 2023

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 2025.

Recommendation:

To agree the Local Development Scheme 2023 update 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 five corporate priorities, which are:

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

This report meets the Norwich is a sustainable and healthy city, Norwich has the infrastructure and housing it needs to be a successful city and Norwich City council is in good shape to serve the city 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 document 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 December 2021 and was intended to cover the period to 2023. Since then, further information has become available surrounding the East Norwich masterplanning exercise, progress on the Greater Norwich Local Plan (GNLP), as well as updates on a neighbourhood planning process and new legislative requirements relating to biodiversity.
5. The revised LDS will run to early 2025 and will entirely supersede the version published in December 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 December 2021:
 - (a) In May 2022, the Government published its Levelling Up and Regeneration Bill (LURB) which includes information on repealing the duty to cooperate, replacing CIL and S106 obligations with a new Infrastructure Levy, introducing mandatory area-wide design codes, the introduction of national development management policies, removal of the five-year land supply requirement in areas with an adopted local plan, replacement of Environmental Impact Assessments with a new system and introduction of a street vote system for planning permissions (list is not exhaustive). Given the political instability of the past few months, plans set out within the LURB have been delayed and amended and at the time of writing it is still unclear which of the proposals will be implemented. Therefore, this version of the LDS assumes 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.
 - (b) In November 2021, the Environment Act came into force and has a number of implications for the planning system, primarily the need to

achieve 10% biodiversity net gain on development sites. This requirement must be implemented by November 2023 and has, in part, generated the need for several additional work streams (Green Infrastructure Strategy and Biodiversity Baseline Study) which are set out below.

- (c) The Statement of Community Involvement was fully revised in 2016, but a minor temporary update was approved in 2020 to increase flexibility in planning consultations as a result of the COVID-19 pandemic. This version of the SCI is still in place but is due for review in the coming months.
- (d) In 2018, a neighbourhood area was designated for the Northern City Centre Area and the Norwich Over the Wensum neighbourhood forum was subsequently designated by Cabinet in April 2022. The neighbourhood forum is now at the initial stages of preparing their neighbourhood plan. The City Council is required to provide assistance in the plan preparation process and is reviewing the forum's anticipated work programme so that council resource can be assigned accordingly.
- (e) The timetable for the production of the GNLP has been amended in the LDS to reflect recent changes to anticipated timescales to adoption. In July 2021, the GNLP was formally submitted to the Planning Inspectorate for examination and the first round of examination hearings were held in March this year. Adoption of the GNLP was previously envisaged in Winter 2022, however a consultation for a call for sites for Gypsy and Traveller development is currently underway and hearings on this issue are currently planned for July 2023, with hearings relating to the housing trajectory and nutrient neutrality planned for March 2023. Given the delay in the examination timetable, the GNLP is now likely to be adopted in early 2024. Further detail of the examination timetable is outlined in Section 5 of the LDS.
- (f) In 2019, the council undertook a review of the DM Policies Plan and Site Allocations Plan in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, which concluded that the local plan policies are fit for purpose at the time but that a full review of the DM policies should take place following the Regulation 19 consultation of the GNLP. However, as set out above in paragraph (a) there is still a significant degree of uncertainty surrounding what planning reforms might be implemented, as well as a delay to the adoption of the GNLP, both of which could impact on any future review of the DM Policies Plan. Therefore, the intention is to commence review of the DM policies in early 2024 when there is greater clarity on proposed planning reforms and the final content of the GNLP.
- (g) Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners commissioned a masterplan for the East Norwich Strategic Regeneration Area (ENSRA) in early 2021, to guide its future regeneration. The Stage 1 masterplan for East Norwich was endorsed by Norwich City Council's Cabinet in November 2021 and the Stage 2 masterplan and associated documents, including a draft supplementary planning document (SPD), in June 2022. A further stage of work (stage 3), led and funded by

Homes England, is currently underway which considers a range of delivery issues, potential delivery mechanisms and refinement of infrastructure costs and triggers. The stage 3 work will help inform the final SPD which will be subject to statutory consultation prior to adoption. Once formally adopted, either alongside or following adoption of the GNLP, the SPD will supplement policies in the GNLP and will be a joint document guiding planning decision making for Norwich City Council, South Norfolk Council, and the Broads Authority.

- (h) Over the past few years Norwich has seen a significant reduction in the office floorspace, largely attributed to the ability to convert offices to residential accommodation under the prior approval process and without planning permission. 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. A copy of the direction and notice was submitted to the Secretary of State (SoS) for consideration, however feedback from the Department for Levelling Up, Housing and Communities (DLUHC) indicated that the area covered by the Direction needs to be more focussed. Further evidence was commissioned, and the boundaries covered by the Direction have been amended. Informal discussion with officers from DLUHC indicates that this would be an acceptable amendment. Cabinet approved the revised Article 4 Direction boundary in December 2022. The next step is to submit a formal request to the SoS to modify the Article 4 Direction. Should the process proceed as envisaged, the Direction should come into force in 2023.
- (i) The River Wensum Strategy was adopted by Norwich City Council and partners in 2018. The River Wensum Strategy Partnership group continue to meet and have progressed to the delivery phase of the project, producing a Delivery Plan in 2021 to focus project delivery for the next two-year period. A number of projects identified within the strategy 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.
- (j) Through the Greater Norwich Development Partnership, Norwich City Council, Broadland and South Norfolk Council's are jointly working on preparing a new Green Infrastructure Strategy for Greater Norwich. This work is currently at the data collection and analysis stage, with the final work expected Spring/Summer 2023.
- (k) To support the implementation of biodiversity net gain as introduced by the Environment Act, Norwich City Council has commissioned a Biodiversity Baseline Study to understand the threats to and opportunities for biodiversity across the city. This study commenced in November 2022 and is currently at data collection stage, with the final work outputs expected in Summer 2023.
- (l) The Norfolk authorities previously commissioned the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) to identify compensatory measures to mitigate the recreation impacts of new development. This study identifies the need to provide green infrastructure as well as payment of a tariff towards mitigation

measures set out within the strategy. A review and refining exercise of the mitigation package and monitoring strategy is currently being commissioned with anticipated completion in mid-late 2023.

- (m) In March 2022, a written Ministerial Statement on Nutrient Levels in River Basin Catchments was issued with supporting documentation that identified that water bodies in the River Wensum and Broads Special Areas of Conservation (SACs) and in the Broadland Ramsar are in unfavourable condition due to nutrient pollution. As such the local planning authorities are unable to grant planning permission for development resulting in additional overnight accommodation unless they are certain it will have no negative effect in nutrient terms on the protected sites. The Norfolk Councils appointed consultants Royal Haskoning in May 2022 to produce a Nutrient Neutrality Mitigation Strategy for the River Wensum and Broads SACs. This will identify specific and deliverable mitigation at a strategic level and is expected to be adopted by local authorities by June 2023. A report to Cabinet on 18th January 2023 seeks approval for the establishment of a Joint Venture company (JV) with Anglian Water and Norfolk authorities. The purpose of the JV is to enable delivery of additional overnight accommodation and unlock homes that are currently on hold by enabling developers to purchase environmental credits to cover the additional nutrient load calculated for their sites. The GNLP will consider policy changes to reflect the issues of nutrient neutrality, and further examination hearings covering this topic will be held in March 2023.

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 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. LDS must be made publicly available and kept up to date. There is no requirement for consultation on their content. However, the LDS is prepared with input internally as well as through engagement with partners such as the GNLP and NSPF teams on workstreams that involve joint working and neighbourhood groupings.

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. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.

13. 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 2022-26 and Budget.

Legal

14. 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.
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

15. 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

16. 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 Act 2004 (as amended by section 111 of the Localism Act 2011).

Background papers: None

Appendices:

1 Local Development Scheme January 2023

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NORWICH
City Council

Sustainable Development Panel 10 January 2023
Item 4 Local Development Scheme for Norwich
Appendix - Appended report

Local Development Scheme for Norwich

January 2023

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 December 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 neighbourhood planning and biodiversity related workstreams.
- 1.5 In May 2022, the Government published its Levelling Up and Regeneration Bill (LURB) which includes information on repealing the duty to cooperate, replacing the Community Infrastructure Levy and S106 obligations with a new Infrastructure Levy, introducing mandatory area-wide design codes, the introduction of National Development Management Policies, removal of the five year land supply requirement in areas with an adopted plan, replacement of Environmental Impact Assessments with a new system and introduction of a street vote system for planning permissions (list is not exhaustive).
- 1.6 Given the political instability of the past few months, plans set out within the LURB have been delayed and amended, however it is still unclear at this time which of the initial proposals will end up being implemented. 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.

Summary of progress since the last LDS

- 1.7 Since publication of the last LDS, progress has been made on the preparation of the **Greater Norwich Local Plan (GNLP)**. Further details are set out in the main body of this document.
- 1.8 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 and is due for review in the coming months.
- 1.9 The **Brownfield Register (Part 1)** was last published in October 2022. 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.
- 1.10 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.
- 1.11 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, producing a Delivery Plan in 2021 to focus project delivery for the next two-year period. A number of projects identified in the strategy 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.
- 1.12 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.

- 1.13 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, the Norwich Over the Wensum Neighbourhood Forum was designated by Cabinet in April 2022. The Forum have begun initial preparation work for a **Neighbourhood Plan**.
- 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 and to support the emerging policy in the GNLP is anticipated in 2023/24.
- 1.15 UEA has updated its **Estates Strategy** to focus on the approach to new development and refurbishment on campus. The university also has the 2019 Development Framework Strategy which is part of the evidence base for the Greater Norwich Local Plan.

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 early 2024.
- 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 2020 to March 2021, was published in November 2022¹.

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);

¹ [Annual Monitoring Report » Greater Norwich Growth Board](#)

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

3. The existing local plan

- 3.1 A number of planning documents are already in place to guide the council's decisions on planning applications. Together these form the existing adopted local plan for Norwich, which has been through a formal process of consultation and independent examination before adoption. 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 9.
- 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 and neighbourhood forum have been designated for the northern city centre area. However, no neighbourhood plans are yet adopted 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.

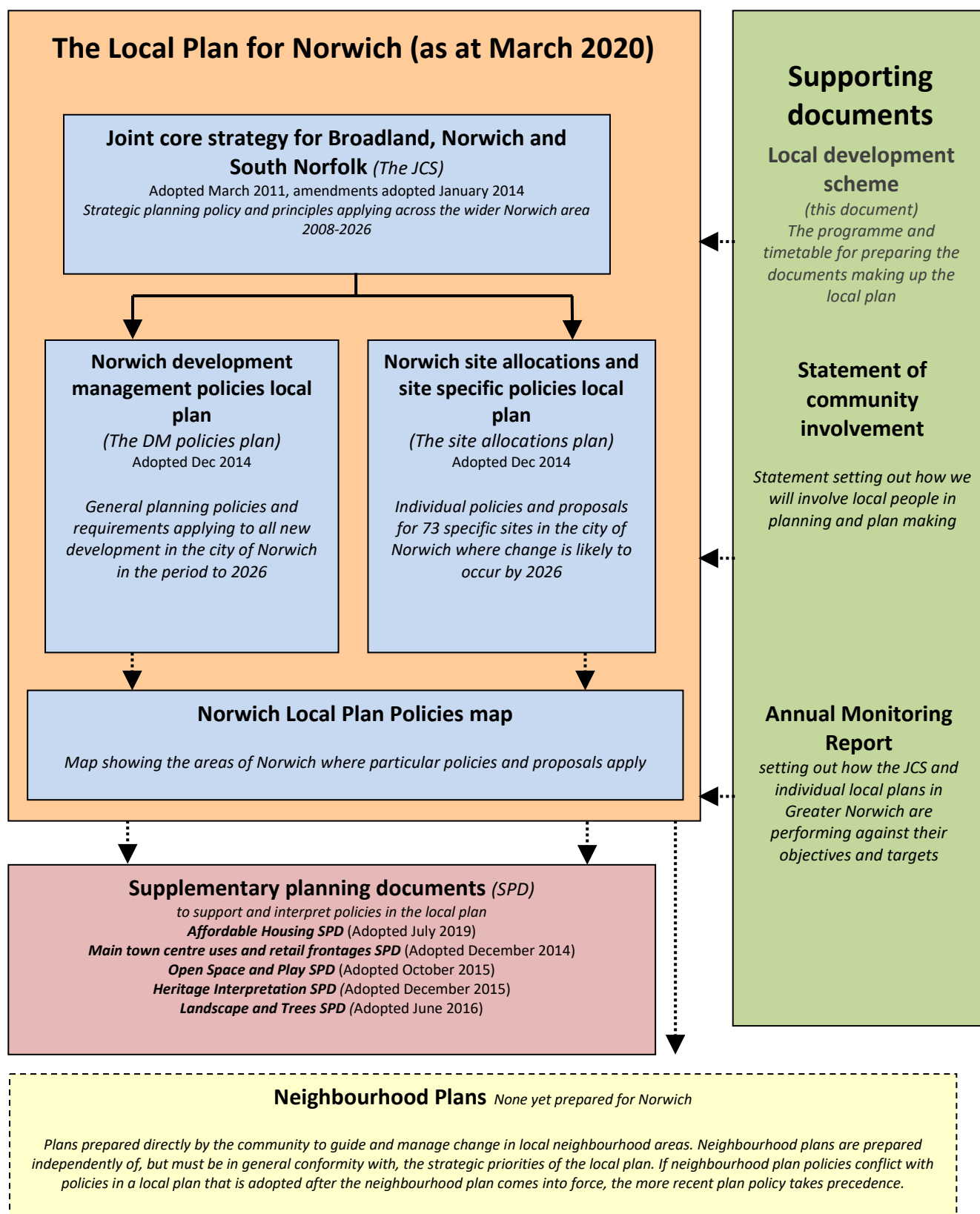


Figure 1: Hierarchy of the local policy context in Norwich

4. Looking forward – the emerging local plan and the 2023-25 LDS programme

- 4.1 The LDS was last reviewed in full in December 2021. This 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**² (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 year. 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 GNLP was formally submitted to the Planning Inspectorate for examination and the first round of examination hearings were held in March this year. Further hearings covering

² <https://gnlp.oc2.uk/>

topics such as the housing trajectory and nutrient neutrality are planned to be held in Spring 2023 with further sessions relating to Gypsy and Traveller sites in July 2023. Given the delay in the examination timetable, the GNLP is now likely to be adopted early 2024.

- 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 Plan³, 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, as set out in paragraphs 1.5-1.6, there is still a significant degree of uncertainty surrounding what planning reforms may be implemented by the government 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 Local Plan in early 2024 when there is greater clarity on proposed planning reforms and on the final 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**⁴ (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. Current workstreams being facilitated through this joint working group include work to resolve cross-boundary issues of nutrient neutrality, and implementation of the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy. The NSPF was revised and endorsed by Norwich City Council in April 2021.
- 4.8 As part of the LURB, it is proposed that the Duty to Cooperate requiring authorities to work together in an ongoing and meaningful way is abolished and replaced with a more flexible alignment test, which is still to be defined/described. The position on joint working will need to be kept under review when there is further clarity on proposals in the LURB.

³ https://www.norwich.gov.uk/info/20199/adopted_local_plan/2494/regulation_10a_review_of_the_local_plan

⁴ https://www.norwich.gov.uk/info/20022/planning_policy/1194/emerging_local_plan_and_evidence_documents/2

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 commissioned a **masterplan for the East Norwich Strategic Regeneration Area (ENSRA)** in early 2021, to guide its future regeneration. The ENSRA comprises approximately 50ha of brownfield land including Carrow works, the adjacent Carrow House, the Deal Ground/May Gurney site, and Utilities Site. Its regeneration is of strategic importance to the future growth and success of the city and wider area. It represents the largest regeneration scheme in Greater Norwich and has the potential to deliver a highly sustainable mixed use new community comprising up to 4,000 homes (as proposed in the Regulation 19 Greater Norwich Local Plan) alongside considerable employment and community spaces, linking the city centre with the Broads National Park at Whitlingham. To unlock the potential of this area there will need to be considerable investment in physical, social and community infrastructure to support redevelopment.

The master-planning exercise was completed by consultants Avison Young and partners and overseen by a public private partnership led by Norwich City Council and including Homes England. The Stage 1 masterplan for East Norwich was endorsed by Norwich City Council's Cabinet in November 2021 and the Stage 2 masterplan and associated documents, including a draft supplementary planning document, in June 2022. The stage 2 masterplan and draft SPD envisage around 3,600 new homes and at least 4,000 new jobs for East Norwich as a whole.

A further stage of work (Stage 3), led and funded by Homes England, is currently underway which considers a range of delivery issues including potential delivery mechanisms, and refinement of infrastructure costs and triggers. The Stage 3 work will help inform the content of the final SPD which will be subject to statutory consultation prior to adoption (see section 5 for timescales) in order to reflect the revised programme for adoption of the GNLP.

The SPD once formally adopted will supplement policies in the GNLP, currently undergoing public examination, and provide a framework for delivery of significant regeneration of the East Norwich area. The SPD will be a joint document, guiding planning decision making for Norwich City Council, South Norfolk Council and the Broads Authority.

Other committed and potential workstreams

- 4.9 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

4.10 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 2015⁵ (as amended by the Housing and Planning Act 2016).
- Through the Greater Norwich Development Partnership, Norwich City, Broadland and South Norfolk Council's are jointly working on preparing a new **Green Infrastructure Strategy for Greater Norwich**. This work is currently at the data collection and analysis stage, with the final work expected in Spring/Summer 2023.
- To support the implementation of biodiversity net gain as introduced by the Environment Act, Norwich City Council has commissioned a **Biodiversity Baseline Study**. This study commenced in November 2022 and is currently at data collection stage, with the final work expected in Summer 2023.
- In exercising their duties as a local authority, the council has a legal duty to comply with the Conservation of Habitats and Species Regulations 2017. This requires the authority to assess the impacts of all plans and programmes that may affect the protected features of any site protected under those regulations. Recreational pressures from growth and the resultant impact on designated habitat sites is a cross boundary issue affecting all local plans in Norfolk. Compensatory measures to mitigate the recreation impacts have been identified within the **Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS)**, which was commissioned on behalf of all the Norfolk authorities. This identifies that new developments are required to provide appropriate green infrastructure as well as payment of a tariff towards mitigation measures set out in the strategy. A review and refining exercise of the mitigation package and monitoring strategy set out in the original strategy is currently being commissioned with anticipated completion in mid-late 2023.
- On March 16th 2022, a Written Ministerial Statement (WMS) on Nutrient Levels in River Basin Catchments was issued. It signalled changes in the approach to the assessment of development proposals in catchments where water bodies that are

⁵ <http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

protected sites under the Habitat Regulations are in unfavourable condition due to nutrient pollution. The WMS stated that “Local Planning Authorities can only approve a project if they are certain it will have no negative effect on the protected site”. At the same time, the Chief Planner sent a letter to the affected local planning authorities (LPAs) on nutrient pollution issues, support and funding. NE also published advice and support on how to evidence that nutrient neutrality will be achieved in relevant new development in order to mitigate impacts on the protected habitats. Supporting documentation identified that relevant development in large parts of Greater Norwich impacts on protected water bodies in the River Wensum and the Broads Special Areas of Conservation (SACs) and in the Broadland Ramsar. As with all affected councils, this means that the city council is currently unable to grant planning permission where a development will result in additional overnight stays. The Norfolk councils appointed consultants Royal Haskoning in May 2022 to produce a **Nutrient Neutrality Mitigation Strategy** for the River Wensum Special Area of Conservation (SAC) and the Broads SAC. The strategy will identify specific and deliverable mitigation at a strategic level. It is currently expected that the strategy will be adopted by Local Authorities by June 2023. Work is underway to establish a Joint venture (JV) company with Anglian Water and Norfolk authorities (subject to Cabinet approval). The purpose of the JV is to enable delivery of additional overnight accommodation and unlock homes that are currently on hold by enabling developers to purchase environmental credits to cover the additional nutrient load calculated for their sites. The GNLP will consider policy changes to reflect the issue of nutrient neutrality; the GNLP examination hearing on nutrient neutrality session is programmed for March 2023.

- 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. 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 was submitted to the Secretary of State (SoS) for consideration, however feedback from the Department of Levelling Up, Housing and Communities indicated that the area to be covered by the Article 4 Direction needs to be more focused. Subsequently, consultants were commissioned to update the evidence for the Article 4 Direction, and the boundaries to be covered by the Direction have been amended. Informal discussion with officers from DLUHC have indicated that this would be an acceptable amendment. Cabinet approved the revised Article 4 Direction boundary in December 2022. The next step is to submit a formal request to the SoS to modify the Article 4 Direction. Should the process proceed as envisaged, the Direction should come into force in 2023.
- In 2018, a neighbourhood area was designated for the Northern City Centre Area and the Norwich over the Wensum neighbourhood forum was subsequently designated by Cabinet in April 2022. The neighbourhood forum is now at the initial stages of preparing their neighbourhood plan. The City Council is required to provide assistance

in the plan preparation process and is reviewing the forum's anticipated work programme so that council resource can be assigned accordingly.

Potential Additional Work

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

- **The Environment Act**⁶ came into force in November 2021. The Act makes provision about targets, plans and policies for improving the natural environment. The Act has a number of implications for the planning system, in particular the need for development sites to achieve 10% biodiversity net gain compared to pre-development levels; as well the production of Local Nature Recovery Strategies to contribute to a national nature recovery network. The LNRS is a workstream led by the county council. The biodiversity net gain requirement must be implemented by November 2023, and has therefore generated the need for several additional work streams (see below).
- In 2019, the Government published the first two parts of the **National Design Guide**⁷. 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 and sets 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 and guides, and when determining planning applications. Since then, the LURB proposes that all local planning authorities will be required to produce a design code for its area. These codes will have full weight in making decisions on development either as part of the local plan or as supplementary planning documents. Further clarity is required on what requirements will be put in place as result of the LURB and the timescales for doing so. Additional resource will be required as well as an assessment of internal expertise.

⁶ <https://services.parliament.uk/bills/2019-20/environment.html>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

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 excludes 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"> a) the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014) a) the Norwich Site Allocations and Site Specific Policies Local Plan (adopted December 2014)
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 www.gnlp.org.uk .	
Regulation 18 draft plan	January – March 2020
Publish pre-submission (Regulation 19) document	February – March 2021
Formal submission of GNLP to Secretary Of State (Regulation 22)	July 2021
Call for Gypsy and Traveller Sites Consultation	Ongoing
Housing trajectory examination in public hearings	Spring 2023
Gypsy and Traveller sites public hearings	July 2023
Main modifications published for consultation	Autumn 2023
Adoption of the Greater Norwich Local Plan	Early 2024
Monitoring and review	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.

Document Title	East Norwich Masterplan
Role and content	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.
Status	Non-statutory supplementary planning document.
Geographical coverage	East Norwich sites including the Deal Ground, Utilities Site, May Gurney and Carrow Works identified on East Norwich masterplan map ⁸ .
Joint working arrangements (if any)	A public-private partnership board (the East Norwich Partnership – ENP) was formed in 2020 to drive forward the regeneration of East Norwich and particularly the production of a masterplan. Following completion of the masterplan, the ENP was superseded by the East Norwich Delivery Board (from October 2022). The Board is led by Norwich City Council and membership includes Homes England, South Norfolk Council, Norfolk County Council, and the Broads Authority.
Conformity	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.
Relationship with adopted local plan(s)	The East Norwich Masterplan will be adopted as an SPD by the Greater Norwich authorities and the BA to support policies set out in the emerging GNLP and the BA Local Plan.

Production milestones (provisional) Overall production period Consultation Adoption	November 2021 – March 2022, with updates in mid- late 2023 Late 2023/early 2024 Early 2024 (alongside or shortly after) adoption of GNLP)
Monitoring and Review	Ongoing



Committee name: Sustainable development panel

Committee date: 10/01/2023

Report title: Retail 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 October 2022 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.

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

Recommendation:

It is recommended that Members note the findings of the October 2022 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor and consider what implications the findings have both in terms of informing planning decisions and considering the future direction of our planning policies. Consideration also needs to be given to the frequency of retail monitoring taking into account resources.

Policy framework

The council has five corporate priorities, which are:

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

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

This report addresses the first four aims.

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

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

Report details

1. This report presents the findings of the October 2022 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 both locally and nationally that there is a need for greater flexibility to allow our high streets to evolve in order for them to thrive. This is reflected in recent changes to government policy and within the policy approach set out in the emerging Greater Norwich Local Plan. The scope of the Monitor has therefore been extended to also look at all town centre uses.
3. The Monitor is based on a survey of the city's retail offer carried out in October 2022. This report updates members from the last full retail monitor which was produced in July 2021 and also the update report which was produced in March 2022. The [July 2021 report](#) showed that there had been a significant rise in retail vacancy rates since the previous full report which was produced in October 2019 with vacant floorspace reaching 14.5% and vacant units reaching 14.1%. This was unsurprising given the challenging circumstances faced by retailers and due to the low footfall during the pandemic. The findings in July 2021 did however show how important Norwich's independent retailers were with the high vacancy rates largely being attributed to the closure of a number of multiples with large floorspaces.
4. The [March 2022 survey](#) showed an overall improvement in shop vacancy rates for shop units and it showed that other than within the Large District Centre, the city was moving in a positive direction. In terms of vacant floorspace, parts of the city centre saw a reduction in vacancies whilst other areas continued to see an increase.

Main findings of the 2022 Retail Monitor

5. The Norwich City Centre Shopping Floorspace Monitor and Local and District Centres Monitor (October 2022) 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 12.2% which is quite a significant decrease from July 2021's figure of 14.5% although this is still high when compared to a pre pandemic figure of only 5.5%. The July 2021 figure was 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 decreased from 15.2% in July 2021 to 14.2% in October 2022. The pre pandemic level was 10.0%.
 - (b) The percentage of vacant *units* has also decreased from 14.1% in July 2021 to 12.6% in October 2022. This fall of 1.5% is significantly better than the decrease in vacancy rates that has taken place nationally. In H1 2021 national retail vacancy rates stood at 15.8% whereas in H1 2022

they had decreased by 0.4% to 15.4% (Local Data Company, September 2022¹). Norwich therefore still compares very favourably to the average GB retail vacancy rate.

- (c) In terms of all town centre uses, vacant floorspace currently stands at 15.4% (down from 16.2% in July 2021) and vacant units at 13.0% (down from 15.2% in July 2021). Compared to retail only this is 1.2% higher for floorspace and 0.4% higher for units.
- (d) Overall the amount of retail floorspace in the city centre continues to decrease. Between July 2021 and October 2022, it reduced by nearly 6,000 sqm which is a 2.9% decrease. This is significantly more than between October 2019 and July 2021 where it reduced by only 1,534m² which was a 0.7% decrease. Over previous monitoring periods we have seen similar levels of reduction with for example between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m² which was a 2.8% decrease. The total number of retail units also reduced significantly from 971 in July 2021 to 947 in October 2022 which is a 2.5% decrease. Between October 2019 and July 2021 there was no change in the number of units despite floorspace decreasing which suggested that it was the larger units that were changing away from retail whilst some of the smaller units were actually reverting back to retail use. Now it would appear that some of the smaller units are changing away from retail too.
- (e) The loss of retail has largely been due to changes of use to other town centre uses rather than to residential or due to demolition. In particular several former shops within Castle Quarter have changed to leisure uses and during the past monitoring period the opening of the job centre has impacted significantly on the loss of retail.
- (f) Over the past monitoring period there has been a significant increase in the amount of floorspace under construction/refurbishment. This indicates that investment is taking place. Currently 13 retail units (4,108sqm floorspace) are under construction/ refurbishment which compares to 5 units (514 sqm) in March 2022 and 7 units (1,384sqm) in July 2021.
- (g) Since the July 2021 survey Norwich has continued to lose national chains from the city centre whereas independent shops, particularly within the secondary retail area and the Magdalen Street Large District centre, have been more resilient. Several new chains however have recently opened.
- (h) Within the Primary retail area vacant available floorspace currently stands at 12.2% which is a 2.3% reduction on 2021 rates where 14.5% of available floorspace was empty. This is still a significant increase in the percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019 but it shows that the primary area has started to recover. Most of the primary area retail frontage zones are performing reasonably well in terms of their retail function. In July 2021 it was reported that all frontages were within their recommended minimum percentage rate of A1 retail. Since March 2022 the percentage of non-retail frontage within Castle Quarter has increased quite significantly which has resulted in the percentage of retail dropping below the minimum thresholds. The level of retail has remained stable in all other frontage zones with the percentage of retail increasing in two of the seven zones.

¹ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)
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- (i) Retail vacancies remain very high in the secondary retail area and have continued to creep up. In terms of vacant floorspace it now stands at 23.3% and vacant units at 10.7%. This high vacancy rate is primarily due to the closure of Toys R Us in April 2018 and the closure of a further unit in the Cathedral Retail Park in July 2021. If these two units are omitted from both the vacant floorspace and total floorspace, the vacancy floorspace rate in the secondary retail area would only be 6.5% which is well below the national average of 15.4% and one of the lowest in the city centre. This shows that the secondary retail area (excluding the Cathedral retail park) is still performing well in providing independent retail diversity and by adapting rapidly it appears that it has remained resilient during the pandemic and has recovered well.
 - (j) In the Large District Centres, vacant floorspace rates have decreased from 9.1% in July 2021 to 5.6%. This is a low figure for a shopping area which does not form a central part of the city's retail offer. The vacancy rate at Riverside has reduced significantly from 13.7% for floorspace to 4.9% and from 19.0% for units to 8.5%. In 2021 Magdalen Street, Anglia Square and St Augustine's Large District Centre has relatively low rates of vacancies at 7.0% for floorspace and 10.8% for units. This has not changed significantly over the last year with the floorspace vacancy figure now being 6.3%. The number of vacant units has increased slightly to 12.1%. 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 (restaurants, bars and fast food).
 - (k) In the rest of the city centre (streets outside the defined areas), vacant available floorspace has decreased from 13.7% in 2021 to 10.0% which is around 2% lower than the city centre averages. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%. The percentage of vacant retail *units* in the rest of the city centre has also reduced from 25 units (19.4%) in July 2021 to 19 units (15.8%) in October 2022.
 - (l) Vacancy rates in the ten existing district centres have decreased significantly from 9.8% in 2021 to 5.6% in October 2022. Vacancy rates in the 28 local centres have also decreased from 12.7% to 7.1% over the same period. Vacancy rates vary considerably within each of the district and local centres but overall the centres have a much lower average vacancy than the city centre. This would suggest that the neighbourhood centres are continuing to be robust and vibrant and to offer an appropriate range of local services and facilities, with food stores being most important to their success. During the pandemic people started to shop locally and this seems to be continuing.
6. Retail vacancy rates have reduced quite significantly since July 2021 and rates have decreased in all city centre areas except the secondary retail area where they have increased very slightly. Vacancy rates have also fallen within the District and Local centres. High vacancy rates in July 2021 were unsurprising given the challenging circumstances faced by retailers during the pandemic and given that footfall had been so low for much of 2020 and 2021 with people working from home and choosing to either shop locally or turning to online

retailing and it is encouraging to see how well Norwich has recovered and bounced back from this very difficult period.

7. It was quite uncertain whether shops would be able to survive the impact of the pandemic particularly once business rates relief and other government support came to an end but within Norwich not only have the majority been able to survive but several new multiples and independents have also opened within the past 12 months or so.
8. Norwich's independent retailers have continued to be very resilient and have performed well and this can be shown by the low vacancy rates within both the secondary retail area (when excluding vacant units within the Cathedral Retail Park) and the Magdalen Street, Anglia Square & St Augustine's LDC where vacancy rates are only 6.5% and 5.6% respectively which is extremely low when compared to a national average retail vacancy rate of 15.4%.
9. This monitoring report now also looks at all town centre use vacancy rates as well as retail. Nationally leisure vacancy rates are lower than retail and whilst it is difficult to compare due to different methodologies of collecting and analysing data, the overall vacancy rate for the city centre does increase when other town centre uses are taken into account.
10. In terms of the total amount of retail floorspace within the city centre, it is continuing to decrease at quite significant rates. Within this monitoring period nearly 6,000sqm of retail floorspace was lost which is a 2.9% decrease. This now means that since 2008 Norwich city centre has lost around 8.3% of its retail provision. The retail however is generally not being lost to residential or being demolished; instead, the city is experiencing diversification with the floorspace generally changing to other town centre uses. Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that 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.
11. 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 need to be repurposed to other town centre uses.
12. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and as a result of the pandemic. Whilst it is likely that these challenges will have ongoing impacts for the viability of some retail businesses, the past 12 months have shown just how resilient the majority of our businesses are (especially Norwich's independent businesses) and how successfully they have managed to recover. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving.

13. It is also encouraging how footfall has significantly increased and has now returned to pre pandemic levels. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around and enjoy their time within the city.
14. It is also important to acknowledge that there are many changes that can now take place within retail centres without the direction of the council which include the change of use to other town centre uses but also the change of use to residential without the need for full planning permission. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified several risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned that extending the use of permitted development rights to change to residential could be hugely detrimental to this. Without being able to consider the impact that the loss of town centres uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses at ground floor level which will result in residential interspersed with town centre uses. This will not only affect the way that our high streets function but it could reduce rather than increase footfall. For this reason the Council has concern that the uncontrolled and piecemeal loss of town centre uses could be a threat to the vitality and vibrancy of our high street and it is going to be very important to continue to monitor change over the coming few years.
15. It is also important to acknowledge that Norwich, as with all cities, faces an extremely uncertain time ahead. Whilst Norwich has recovered well from the impacts of the pandemic, rising costs, inflations and interest rates will impact both retailers and consumers. The Local Data Company predicts that vacancy rates will continue their downward trajectory with the national vacancy rate reaching 13.7% in 2023. This seems very optimistic and with the challenges ahead, some shops and business will inevitably struggle and look to close stores so it would not be a surprise if vacancy rates do start to creep up again.
16. Notwithstanding the above, given the circumstances Norwich has demonstrated that it remains robust and is a thriving retail centre in the East of England with vacancy rates being down and footfall being up. To continue this success, the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced ahead, including working closely with Norwich BID and other key stakeholders.

Consultation

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

Implications

Financial and resources

18. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget. There are no proposals in this report that

would reduce or increase resources. Staff time to carry out the monitor is met from existing budgets.

Legal

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 it is felt best to await the outcome of the public examination of the GNLP and to see what changes the government will make to the National Planning Policy Framework and what is proposed in terms of the National Development Management Policies. Instead of reviewing our policies now, it is suggested that consideration is given to how much weight should be applied to existing Development Management Policies and whether more weight should now be given to government policy and our emerging GNLP.

21. In terms of the frequency of monitoring, the Council made the decision in 2021 to increase the frequency of monitoring in order to better understand the impact that the pandemic was having on our high street. It was proposed that once every year a full monitor report would be produced (including surveys of District and Local Centres) and around six months in between a survey would be carried out of the city centre but only a summary report would be produced. This has been useful during this unprecedented period; however, things have started to settle down and given the task is extremely resource intensive, consideration now needs to be given to whether it would be appropriate to return to an annual survey. This is considered sufficient to assist in making planning decisions and informing the future direction of policies. This approach would not necessarily restrict further survey work being done if felt necessary.

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, in particular in terms of the weight that is applied to the existing rather restrictive Development Management policies and the weight that must be applied to the emerging GNLP as well as national policy. Consideration also needs to be given to the frequency of retail monitoring. It is not recommended to make changes to the Development Management policies at this point in time as it is proposed to await the outcome of the GNLP examination and to see what changes are proposed nationally; however, it is useful to begin discussions.

Background papers: None

Appendices: Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor (October 2022)

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



Survey at October 2022

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Introduction

1. Norwich city centre is the pre-eminent regional centre in the East of England, focused on a historic city centre with a wealth of heritage assets and an unrivalled historic and natural environment. It accommodates the majority of jobs, key services and economic, leisure and cultural facilities serving much of Norfolk and north Suffolk. It is within the top 15 retail destinations in the UK. The established approach to planning for Norwich city centre has been cited as an example of best practice by Government¹.
2. In order to get a picture of how our high street has changed over time and to help assess the performance of our planning policies and assist in their implementation, regular retail surveys are carried out of the city centre and Norwich's District and Local Centres. The last full retail floorspace monitor was carried out in July 2021 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 retail vacancy rates had risen significantly since October 2019 which was not a surprise given there had been three lockdowns and for much of the period footfall within the city was extremely low with people choosing to either shop locally or turning to online retailing.
3. Due to Norwich city centre seeing unprecedented change the decision was taken by Members to increase the frequency of monitoring and in order to gain some indication as to how our high street was recovering from the pandemic a survey was also carried out in March 2022 of the city centre retail area. A full report was not written although an update to the July 2021 was produced which was published on Norwich City Council's website. Surveys were not carried out of the District and Local Centres in March 2022 due to this being too resource intensive.
4. The key finding of the March 2022 survey was that there was a slight overall improvement in the number of vacant shop units and other than within the Large District Centre, the city was moving in a positive direction. In terms of vacant floorspace, parts of the city centre saw a reduction in vacancies whilst other areas continued to see an increase. This further supported the findings of the July 2021 survey that generally it is the smaller retailers (of which many are independents) that were performing better and were more resilient whereas many of the larger units remained vacant.
5. As has been the case nationally, it is clear that the covid pandemic impacted upon our high street and this report seeks to understand if and how the city has recovered since the final stage of easing covid restrictions on 19th July 2021.
6. The July 2021 report also for the first time gave vacancy rates for all town centre uses (such as financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways, offices, medical and health services, sport and leisure uses and betting shops) as previous to this the main purpose of the reports had been to measure vacancy rates for retail only (formerly Use Class A1) and to provide data on the total amount of retail floorspace within the city centre. Particularly due to the changes in the Use Classes Order and the General Permitted Development Order (which are

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

explained later within this section), it is considered important to include other town centre uses as there is a general acceptance, including in government policy that high streets do need to evolve in order for them to thrive.

7. With the amount of total retail floorspace reducing year on year we now need to look at what contribution other town centre uses are making to the long-term vitality and viability of Norwich City Centre and it is hoped that this wider scope provides an improved understanding of the 'health' of the city centre overall and the impacts of current relaxations both on the city centre and more widely. Overtime we will be able to start to look at trends for all town centre uses as well as retail which should help assist with policy monitoring and help inform/support initiatives such as a city centre strategy. This will enable us to look at our high street much more holistically.

Policy Context

Existing policy framework

8. 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.
9. 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).² The plan covers the period from 2008 to 2026 and will be superseded by the Greater Norwich Local Plan which is due to be adopted in early 2024.
10. 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.
11. 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

² 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

needs is also supported.

12. 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.
13. 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.
14. 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

15. Over the past couple of years 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.
16. Firstly the Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories known as 'Use Classes'. On 1st 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 any purposes within Class E can now change to any other use within Class E without the need for planning permission.
17. 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)
18. 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.
19. 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

20. 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 came into force on 1st August 2021. 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

21. The Greater Norwich Local Plan is due to replace the Joint Core Strategy in early 2024 (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.
22. 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.
23. 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.

24. 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.
25. The Norwich City Centre Future Strategy³ 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.

³ [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	14.0%	15.4%	10.6%

26. 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 2022 (H1 2022 retail and leisure trends analysis, published September 2022). This sets out how the country was beginning to return to normality after the pandemic and with all restrictions being lifted and with two years' worth of disposable income saved over the past couple of years, it was the ideal environment for a consumer. However with mounting costs, widespread inflation and supply chain issues it looks like H2 2022 will be unpredictable. The key findings from their most recent publication are as follows:

- (1) The latest data tells a story of continued recovery across all areas of the retail and leisure sector, with positive sentiment woven throughout the latest numbers.
- (2) H1 2022 saw fewer retail casualties compared to previous periods. The net change in units was -923 which is the best this figure has been since 2017 and well above pre pandemic levels. H1 2019 for example saw a net loss of -4,402. This reduction in net change of units was largely down to a fall in closures (down 7% year on year) and openings were up 7.4% (their highest level for any H1 period since 2014).
- (3) A fall in all vacancy rates of 0.5% since H1 2021 marks the largest decline in vacancies since records began in 2013 (reduction from 14.5% in H1 2021 to 14.0% in H1 2022). The leisure vacancy rate dropped from 11.3% in H1 2021 to 10.6% in H1 2022 and the retail rate also saw a significant improvement reducing from 15.8% in H1 2021 to 15.4% in H1 2022.
- (4) Shopping centres still have the largest vacancy rate of any location type. They struggled in the last two years amid closure from several big-name brands and 18.9% of units still sit empty. High street vacancy rates on the other hand are 14.0% with retail parks having only 10.2% vacant units.
- (5) Independents continued to grow in H1 2022. Across Great Britain, independents experienced a net increase of 1,335 units, up from a net growth of 804 in H1 2021. Multiples saw an improvement in this period with 2,993 fewer units lost than in H1 2021 however there was still a net decline of -2,258 units in H1 2022.
- (6) Fast food takeaway was the fastest-growing subcategory for the second consecutive H1 period. Beauty salons come in second. Bars have also experienced a revival following the end of restrictions and the return of office workers. Convenience stores are also one of the top fastest growing categories. This continues to benefit from consumers shopping locally and more frequently. Pet shops made an entry into the top 10 for the first time

as pet ownership increased over the pandemic. The fastest declining categories include hairdressers, bookmakers, charity shops, banks and estate agents.

- (7) Independents continued to be more resilient than multiples. This is encouraging for the independent sector particularly given initial fears about how the end of business rates relief and the commercial rent moratorium would affect independent occupiers. However with high inflations, rising fuel and energy costs and higher supply costs, independent retails will be under immense pressure to survive H2 2022.
- (8) The Local Data Company predicts that vacancy rates will continue their downward trajectory, with the national vacancy rate reaching 15.1% for retail and 13.7% for retail and leisure combined in H1 2023. There is likely to however be a slow down in recovery as occupiers become more cautious with expansion.
- (9) There are several factors which will impact upon net change in units. Households will need to rein in their spending as inflation outstrips wage growth. Retailers are also under pressure from supply-side factors, increasing energy costs and increase in the cost of products.

Main Findings for Norwich

City Centre Overview

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since March 22)
City Centre (Retail only)	14.2%	12.2%	12.6%	1.7% decrease

27. 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.

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

29. The vacant available retail *floorspace* in the city centre is 12.2% which is quite a significant decrease from July 2021's figure of 14.5% although it is still high when compared to a pre pandemic figure of only 5.5%. The July 2021 figure was 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.

30. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also decreased from 15.2% in July 2021 to 14.2% in October 2022. The pre pandemic level was 10.0%.

31. The percentage of vacant *units* has decreased from 14.1% in July 2021 to 12.6% in October 2022. This fall of 1.5% is significantly better than the decrease in vacancy rates that has taken place nationally. In H1 2021 national retail vacancy rates stood at 15.8% whereas in H1 2022 they had decreased by 0.4% to 15.4% (Local Data Company, September 2022⁴). Norwich therefore still compares very favourably to the average GB retail vacancy rate. However, direct comparison with national rates is difficult due to methodological differences between surveys and due to the surveys covering different areas i.e. national figures include high streets, shopping centres, retail parks and standalones in local neighbourhood parades.

32. In terms of all town centre uses, vacant floorspace currently stands at 15.4% (down from 16.2% in July 2021) and vacant units at 13.0% (down from 15.2% in July 2021). Compared to retail only this is 1.2% higher for floorspace and

⁴ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

0.4% higher for units. This suggests that by adding leisure uses (including cafes, restaurants, bars and takeaways) as well as financial, professional and other services the percentage of vacant units and floorspace increases. Whilst it is very difficult to compare with national figures due to the difference in surveys and methodology, the national picture is that leisure vacancy rates are lower than retail vacancy rates which does not necessarily seem to be the case in Norwich.

33. Overall the amount of retail floorspace in the city centre continues to decrease. Between July 2021 and October 2022, it reduced by nearly 6,000 sqm which is a 2.9% decrease. This is significantly more than between October 2019 and July 2021 where it reduced by only 1,534m² which was a 0.7% decrease. Over previous monitoring periods we have seen similar levels of reduction with for example between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m² which was a 2.8% decrease.
34. The total number of retail units also reduced significantly from 971 in July 2021 to 947 in October 2022 which is a 2.5% decrease. Between October 2019 and July 2021 there was no change in the number of units despite floorspace decrease which suggested that it was the larger units that were changing away from retail whilst some of the smaller units were actually reverting back to retail use. Now it would appear that some of the smaller units are changing away from retail too.
35. Between July 2021 and October 2022 the loss of retail floorspace and units can largely be attributed to the change of use of several former shops within Castle Quarter to the job centre and other changes of use within Castle Quarter to leisure uses such as escape rooms and indoor crazy golf. Other changes across the city centre have also contributed to the loss of retail and these include; a former retail unit changing to Burger King on Brigg Street, a lazer clinic opening in Chantry Place, a games room opening on Elm Hill, a climbing café opening on Magdalen Street, aesthetic clinics opening on St Benedicts Street and St Giles Street and tattoo parlours opening on Rose Lane and St Benedicts Street. Generally over the past few years the loss of retail has largely been due to changes of use to other town centre uses rather than to residential or due to demolition.
36. In terms of refurbishment, there has been a significant increase in under construction/refurbishment floorspace since the last monitoring report which indicates that investment is taking place within Norwich. Currently 13 retail units (4,108sqm floorspace) are under construction/ refurbishment which compares to 5 units (514 sqm) in March 2022 and 7 units (1,384sqm) in July 2021. Schemes include the conversion of Topshop to a Morrisons at ground floor level and residential above, the closure of Tesco at Guildhall to build a hotel above and behind it and the conversion of a large unit in Castle Quarter to a virtual reality and gaming room. There is quite a lot of redevelopment/refurbishment also taking place within premises where the last use was not retail which are not picked up within these figures. Of particular note is the redevelopment of the former Jamie's Italian in the Royal Arcade which whilst under construction at the time of survey has now opened as Yalm, an upmarket food hall. There are also three units at Riverside which are undergoing refurbishments.
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. Since 2018 there has also been a continued growth in leisure uses. Many of these leisure uses have been focused within the Castle Quarter with for example the opening of a bowling alley, gaming centres, indoor crazy golf and escape rooms but there has also been several hospitality and leisure uses opening in other places of the city centre such as Chantry Place and the Lanes. It is likely that this trend will continue especially with planning policies being more flexible and with the changes to the Use Classes Order which makes it much easier and quicker for landlords to offer their premises to a wider range of commercial businesses.

38. Change away from retail is clearly a trend that has been experienced nationally over the past few years although according to the Local Data Company over the past 12 months comparison retail has benefited from the return of domestic shoppers and international tourists which has meant that whilst there has still been a net loss of – 1,190 units, the net decline in comparison retail units has improved significantly from previous years (Local Data Company, 2022). The H1 2022 retail and leisure trends analysis (published September 2022 by the Local Data Company⁵) has also set out that the leisure sector saw significant growth over the past 12 months with a net increase of 643 units. This continues to be driven by an increase in takeaway outlets. The H1 2021 report set out that entertainment, restaurants and bars, pubs and clubs had all declined whereas this year there has been a growth in bars and restaurants due to the drive to bring workers back to the office as well as social events and nights out as many make up for lost time.
39. Since the July 2021 survey was carried out, some large national chains have been lost from the city centre. These have included Topshop/Topman, Millie's Cookies, Hamleys, Swarovski, Build and Bear, Nespresso, Patisserie Valerie, Jones Bootmakers and the Disney Store. There are also some stores such as Pizza Hut, TSB, Warren James, Pret, EE, Shoe Zone, Coral and the Perfume Shop that have rationalised the number of stores that they have but have kept a presence within the city. On a more positive note however there are a number of stores which nationally have rationalised over the past few years but have retained their presence in central Norwich which include New Look, Marks and Spencer and 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. This includes The Real Greek, Sevenoaks, Phase Eight/Hobbs/Whistles, Rituals and B&M home store. This is a positive sign and suggests that Norwich is seen as a good place for investment. The Royal Arcade was also recently sold for £3.375m and a number of the previously vacant units have now been occupied which has helped work towards the new director's goal of having the Arcade full and bustling as soon as possible.
41. There has been an 8.3% decrease in retail floorspace since 2008 and 2.9% of this was in the past monitoring period (between July 2021 and October 2022). 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

⁵ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

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. Norfolk County Council (as highway and transport authority) and Norwich City Council (as local planning authority) recognise the importance of creating good quality public space in the city centre to attract visitors and investment and boost active travel. These objectives are captured in the Transport for Norwich Strategy (December 2021)⁶ and the City Centre Public Spaces Plan (July 2020)⁷. The councils have worked together to secure funding from the government's Transforming Cities Fund, Towns Fund and Active Travel Fund to pay for capital projects within Transport for Norwich programme. Schemes have been completed in the last two years in Tombland, London Street, King Street, St Benedict's Street, Exchange Street, St Stephen's Street and around the Train Station. These schemes have created space for walking, cycling, sitting, events, outdoor hospitality and easier boarding and alighting for bus passengers. Schemes planned for implementation in 2023 will improve Hay Hill, St Andrew's Street and Duke Street. A new pedestrian wayfinding system is also being design and will be installed in early 2023.
43. Also of particular importance is the progress that has been made on Norwich's Town Deal projects over the past year or so. 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 with all of Norwich's Towns Deal Fund Business Plans being approved by MHCLG in August 2021. A summary of the eight projects is given in figure 1 below.

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

⁷ [Norwich 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

44. Over the past year a huge amount of progress has been made on the projects including with for example the digi-tech factory project being completed and work on the East Norwich Masterplan progressing well. This 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. The branding project has now been completed with the launch of the [Work in Norwich \(WiN\)](#) digital platform in October 2022 which acts as a gateway for new businesses and people to understand what the city offers. In terms of public realms improvement, the proposals for Hay Hill have now been revealed which includes planters, more seating, a water feature and increased space for cultural activities.
45. Furthermore whilst a number of the other towns deal projects are not directly related to our retail and leisure provision, through supporting the office economy this also supports the balance and symbiosis that exists between the business, retail, hospitality, leisure and cultural sectors in the city centre. This city centre vitality is an essential part of the wider "Norwich offer" to residents, businesses, visitors, workers and students; driving investment and growth to support the city's future economic wellbeing.
46. It should also be noted that Norwich was selected by Government in April as one of 70 places to work directly with the High Street Task Force (HSTF). Following a workshop session and tour of the city centre, the HSTF expert acknowledged that Norwich has many strengths, including a city centre that offers many things including retail, attraction, heritage, civic services, a thriving market, high quality public spaces and strong educational and commercial sectors. Speaking about the visit and the report's findings, the expert went on

to say 'Norwich City Centre is in many ways an exemplar of a successful approach to city centre transformation and there is a lot others could learn'. The main challenge that the HSTF picked up for Norwich was that of rebranding. Their report sets out that if Norwich wants to truly have a greater national or even international profile, then this branding effort requires more ambitious development in terms of not only approach and ideas but also the level of resources to do this. The branding approach needs to be further developed so that it is not only consumer facing but also aimed at bringing in major business investment and 'names' that would perhaps give it a similar profile to some of its regional and national competitors. As part of the Towns Deal project the [Work in Norwich \(WiN\)](#) digital platform has been launched and the High Street Task Force agree that this is positive with the main challenge now being how to sustain this new brand by growing recognition and awareness of it, in order to get as many people using it as possible. It is also going to be important to clarify how the 'Visit Norwich', 'Work in Norwich' and 'City of Stories' brands align, to ensure each achieves its desired outcome for the benefit of the city.

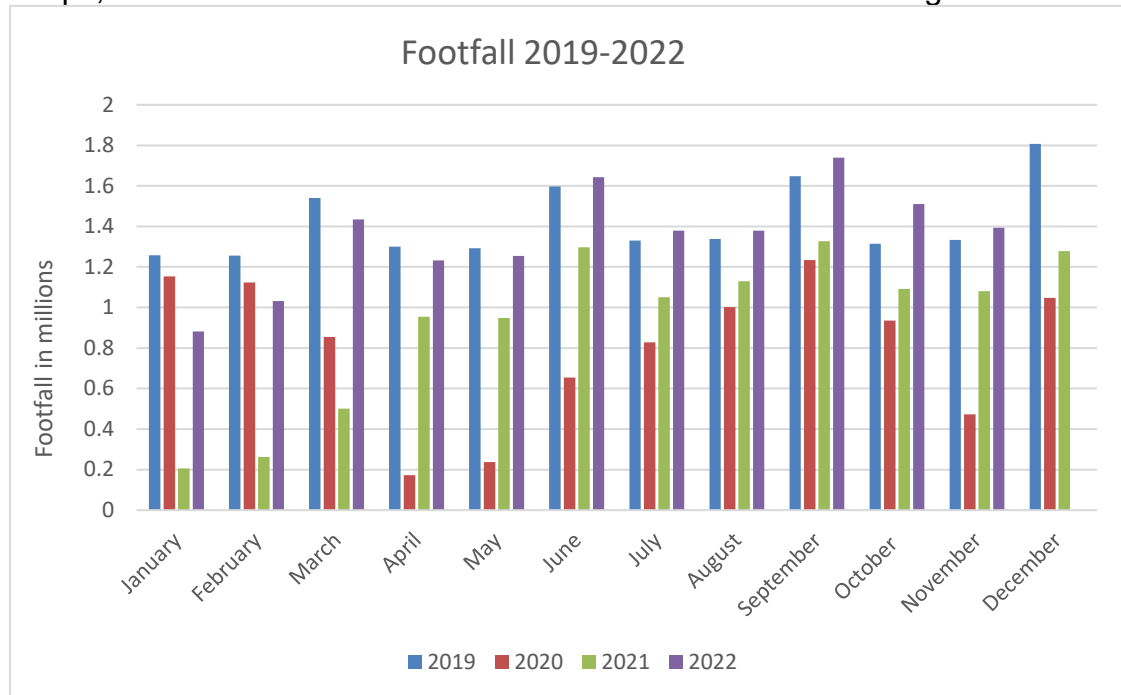
47. In terms of future retail growth, the level of floorspace growth promoted by JCS policy 11 was based on assumptions in a 2007 study and the retail market has changed radically since then. An updated retail study to assess Norwich's current '*retail needs*' to inform retail policy in the emerging Greater Norwich Local Plan (GNLP) was produced in December 2017 by GVA⁸ and a further update was produced in December 2020 by Avison Young⁹ to take account of the impact of both the UK's exit from the European Union and the COVID-19 pandemic. The 2017 report advocates continued support and growth of the comparison goods retail offering, commercial, leisure and other 'main town centre uses' in Norwich City centre. The report recommends a need for an additional 11,000m² - 15,000m² comparison retail floor space to 2027. Further to the above, the report also supports continued improvement to the public realm in Norwich, following recent success of completed improvements. The report considers this approach appropriate to support and enhance its role as a centre of regional-scale shopping and leisure significance. The 2020 report sets out that there has not been a significant change in the convenience goods floorspace forecasts and it remains the case that there is no quantitative requirement to plan for net additional convenience goods floorspace, although there may be qualitative reasons why a modest amount of convenience goods floorspace should be placed in new local centres to support the day to day needs of new communities.
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

⁸ GVA, "[Greater Norwich Employment, Town Centre and Retail Study](#)" (2017)

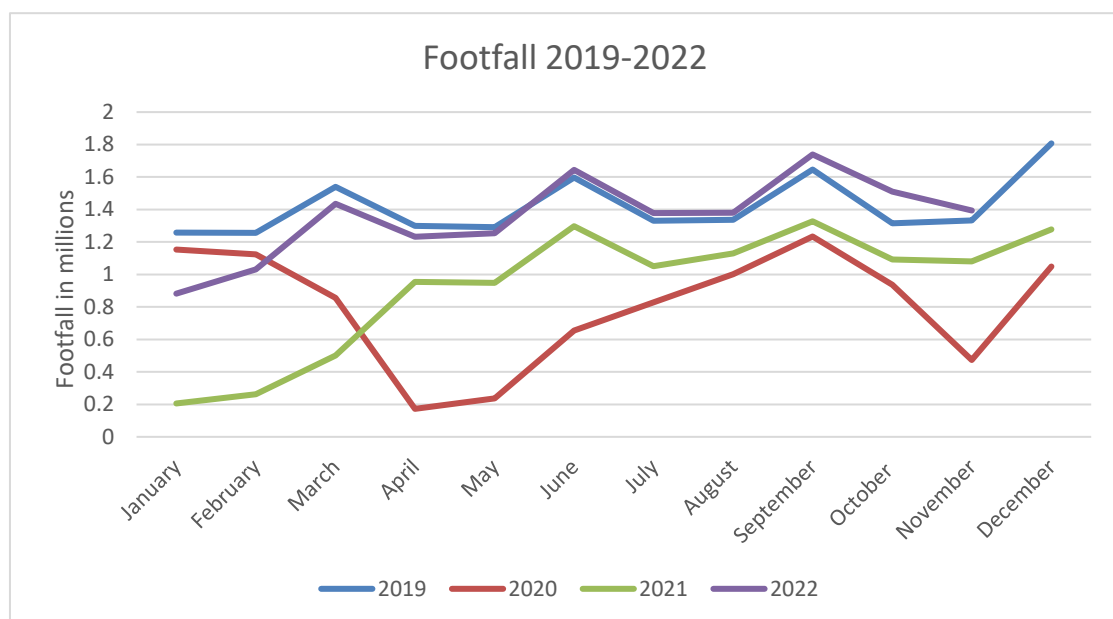
⁹ Avison Young "[Greater Norwich Town Centres & Retail Study Update](#)" (December 2020)

environments.

49. Finally it is important to look at the footfall figures from the Norwich Business Improvement District (BID). The BID has supplied data for each month from January 2019 to November 2022 and as shown in the graphs below there have been significant fluctuations over the past few years which is unsurprising given the impact that three lockdowns has had on footfall within the city centre. However the month on month picture is very positive and as can be seen from the graphs below footfall in 2022 has largely returned back to pre pandemic levels and within the latter half of the year footfall has actually been greater than it was in 2019. It is really encouraging to see that people are returning to the shops, restaurants and leisure facilities and visitors are coming to Norwich.



Graph 1: Footfall in Norwich city centre 2019-2022



Graph 2: Footfall in Norwich city centre 2019-2022

50. **Summary:** The results of the survey for the city centre as a whole presents a very positive picture, particularly given the challenges faced over the past two to three years. The July 2021 report showed that there had been a significant increase in vacant floorspace and units largely as a result of the covid pandemic. However as can be seen from the current vacancy figures, the city has recovered well. The percentage of vacant retail units has reduced from 14.1% to 12.6% which compares very favourably to the average GB retail vacancy rate of 15.4% (down from 15.8% in 2021) (Local Data Company, September 2022¹⁰).
51. Footfall levels have also returned to pre pandemic levels in the city and there is clearly investment being made into Norwich. Whilst the next year or so is extremely uncertain and brings its own challenges, the Norwich city centre retail offering does appear to be fairly robust, largely due to the strength of independents. 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.
52. 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.

¹⁰ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

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

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	210,100	180,303	25,689	4,108
March 2022	213,701	181,137	32,050	514
July 2021	216,005	183,211	31,409	1,385
October 2020	215,949	193,658	21,686*	605
October 2019	217,539	195,891	11,992	9,656
June 2018	223,770	198,519	16,265	8,986
June 2016	223,987	208,342	13,006	2,639
Sept 2015	223,762	210,509	11,028	2,225
April 2014	224,653	213,652	9,513	1,488
August 2013	224,109	208,779	11,849	3,481
January 2011	227,377	203,948	21,035	2,394
July 2010	227,949	198,379	28,315	1,255
January 2010	228,432	206,379	21,810	243
July 2009	229,509	208,674	20,579	256
July 2008	229,120	213,902	14,248	970

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	947	828	106	13
March 2022	966	833	128	5
July 2021	971	834	130	7
October 2020	976	833	140**	3
October 2019	971	873	88	10
June 2018	992	885	98	9
June 2016	1023	906	110	7
Sept 2015	1020	908	103	10
April 2014	1048	930	107	11
August 2013	1054	936	97	21
January 2011	1067	949	108	10
July 2010	1070	938	121	11
January 2010	1079	948	126	5
July 2009	1086	955	128	3
July 2008	1084	967	109	8

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i>Vacant+Refurbishment</i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i>Vacant</i> <i>All</i>	As a proportion of all retail units <i>Vacant+Refurbishment</i> <i>All</i>
October 2022	14.2%	12.2%	12.6%
March 2022	15.2%	15.0%	13.8%
July 2021	15.2%	14.5%	14.1%
October 2020	10.3%	10.0%	14.7%
October 2019	10.0%	5.5%	10.1%
June 2018	11.3%	7.3%	10.8%
June 2016	7.0%	5.8%	11.4%
Sept 2015	5.9%	4.9%	11.1%
April 2014	4.9%	4.2%	11.3%
August 2013	6.8%	5.3%	11.2%
January 2011	10.3%	9.3%	10.1%
July 2010	13.0%	12.4%	11.3%
January 2010	9.7%	9.5%	11.7%
July 2009	9.1%	9.0%	11.8%
July 2008	6.2%	6.2%	10.0%

Overall retail floorspace change

Since March 2022	Decreased by 3,601 sqm (1.7% decrease)
Since July 2021	Decreased by 5,905 sqm (2.9% decrease)
Since July 2008	Decreased by 19,020 sqm (8.3% decrease)

* 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

	As a proportion of all floorspace		As a proportion of all units	
	<u>Vacant+Refurbishment</u>		<u>Vacant+Refurbishment</u>	
	<i>All</i>		<i>All</i>	
	March 2022	October 2022	March 2022	October 2022
Norwich City Centre	15.8%	15.4%	14.3%	13.0%
Primary retail area	15.6%	14.7%	16.3%	12.9%
Secondary Retail area	20.3%	20.0%	10.0%	11.0%
Large District Centre	9.6%	8.0%	12.6%	14.0%
Rest of Centre	17.8%	19.3%	15.0%	14.1%

Table 3: Summary of retail only vacancy rates

	As a proportion of all retail floorspace		As a proportion of all retail units	
	<u>Vacant+Refurbishment</u>		<u>Vacant+Refurbishment</u>	
	<i>All</i>		<i>All</i>	
	March 2022	October 2022	March 2022	October 2022
Norwich City Centre	15.2%	14.2%	13.8%	12.6%
Primary retail area	15.1%	14.9%	14.6%	12.6%
Secondary Retail area	23.2%	23.3%	8.9%	10.7%
Large District Centre	9.4%	5.6%	12.7%	12.1%
Rest of Centre	17.8%	12.2%	18.5%	15.8%

The Primary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since March 22)
Primary Retail Area (Retail only)	14.9%	12.2%	12.6%	1.2% decrease

53. The extent of the primary area, containing the shopping centres and main comparison goods stores, is shown on Map 1.
54. The vacant available *floorspace* rate is currently 12.2% in the primary retail area which is a 2.3% reduction on 2021 rates where 14.5% of available floorspace was empty. This is still a significant increase in the percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019 but it shows that the primary area has started to recover. Previously the peak vacancy rate within the primary retail area was in 2010 when it was 11.7%.
55. Primary Area retail vacancy rates 'as a proportion of all retail floorspace' has remained stable since July 2021. The disparity between vacant + refurbishment (14.9%) and vacant (12.2%) can largely be attributed to the redevelopment of the former Topshop store into a Morrisons at ground floor level and residential at upper floor level and the wider redevelopment of Tesco site on Guildhall Hill into a hotel.
56. The percentage of vacant retail *units* in the Primary Area has also decreased from 15.2% in July 2021 to 12.6% in October 2022.
57. In the July 2021 it was reported that the vacancy rates were of concern particularly as they have increased so significantly over the last monitoring period and were getting close to the national average retail vacancy rate of 15.8%. The percentage of vacant units within the primary area has fallen by 2.6% over the past 15 months which is a significant improvement particularly when compared to the national average retail vacancy rate of 15.4% in H1 2022, which is only a 0.4% reduction from H1 2021 (Local Data Company, published September 2022¹¹). This quite significant reduction in vacancy rates is encouraging and has shown that the city and its key shopping area has started to bounce back after the pandemic.
58. The overall amount of floorspace in A1 retail use within the primary area has decreased by 2,401m² between July 2021 and October 2022, and has reduced by 13 units. Between 2014 and 2018 the amount of retail floorspace has remained relatively constant however there was a significant reduction in retail floor space (5,461 m²) between 2018 and 2019 when a number of units within Castle Quarter changed use from A1 to other uses including a bowling alley, soft play, retro gaming centre, gym and other community/leisure facilities. This trend has continued with a number of further units changing away from retail to leisure and within the Castle Quarter a number of former retail units have

¹¹ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

recently changed to a job centre.

59. The change of use of a number of units away from A1 did prevent a number of units in Castle Quarter sitting empty and has no doubt helped reduce vacancy rates as a few years ago over a quarter of floorspace was vacant. Currently 15.9% of A1 floorspace sits empty but taking into account all town centre uses only 11.3% is actually unoccupied. Several smaller units are however currently vacant as 15 out of 57 A1 shops are unoccupied (26.3%) and 21 out of 95 of all units are empty (22.1%). Longterm vacancies in Castle Quarter is still of concern but generally it is considered that the leisure uses that now occupy the Castle Quarter are preventing a number of particularly large retail units sitting empty and that although certain sectors are declining, they can be replaced with other success town centre business uses which will ultimately increase footfall. It is hoped that the newly refurbished foodcourt may also help increase footfall within the centre.
60. 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 102 (9.8%) and in terms of floorspace vacancy rates are only 3.6%. This is well below the average for the primary retail area and whilst several shops have closed over the past year, these are often replaced very quickly with new tenants.
61. The 2019 retail report set out how the Royal Arcade has experienced a significant change with half of the units being vacant (8 out of 16 units). The Arcade was recently sold and at the time of the October 2022 survey only 3 units remained vacant. Since the survey was carried out Yalm (a new foodhall showcasing some of the best independent chefs and kitchens from the region) has opened and it is hoped that this historic arcade in a very prominent location will go from strength to strength.
62. 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 12.9% (compared to retail only of 12.6%).
63. Table 4, below, provides retail floorspace data for the primary area.

Table 4: Primary shopping area**Retail floorspace (use class A1)**

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	145,862	124,146	17,838	3,878
March 2022	147,573	125,219	22,136	218
July 2021	148,263	126,098	21,564	601
October 2020	148,498	135,424	12,469*	605
October 2019	150,094	134,405	6,148	9,541
June 2018	155,555	139,261	8,265	8,029
June 2016	155,389	143,867	8,883	2,639
Sept 2015	155,139	145,445	7,711	2,017
April 2014	155,884	149,059	5,865	960
August 2013	152,497	141,705	9,382	1,410
January 2011	173,789	157,817	13,967	2,005
July 2010	174,252	153,199	20,448	605
January 2010	174,525	160,541	13,909	75
July 2009	175,256	162,962	12,294	0
July 2008	175,028	168,511	6,434	83

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	508	444	54	10
March 2022	521	445	73	3
July 2021	521	442	76	3
October 2020	524	442	79**	3
October 2019	523	465	50	8
June 2018	530	479	48	3
June 2016	562	484	72	7
Sept 2015	559	481	72	7
April 2014	579	499	74	6
August 2013	567	490	72	5
January 2011	574	524	45	5
July 2010	576	513	58	5
January 2010	578	524	53	1
July 2009	581	524	57	0
July 2008	584	537	46	1

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2022	14.9%	12.2%	12.6%
March 2022	15.1%	15.0%	14.6%
July 2021	14.9%	14.5%	15.2%
October 2020	8.8%	8.4%	15.6%
October 2019	10.5%	4.1%	11.1%
June 2018	10.5%	5.3%	9.8%
June 2016	7.4%	5.7%	14.0%
Sept 2015	6.3%	5.0%	14.1%
April 2014	4.4%	3.8%	13.8%
August 2013	7.1%	6.2%	13.6%
January 2011	9.2%	8.0%	7.8%
July 2010	12.1%	11.7%	10.1%
January 2010	8.0%	8.0%	9.2%
July 2009	7.0%	7.0%	9.8%
July 2008	3.7%	3.7%	7.9%

The Primary Area: Retail Frontages

64. 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).
65. Table 5 provides data on the percentage of retail uses in the primary area retail frontage zones in October 2022. Previously all frontages were within the minimum thresholds set out in the SPD; however since March 2022 the percentage of non retail frontage within Castle Quarter has increased quite significantly which has resulted in the percentage of retail dropping below the minimum thresholds. This is largely a result of the job centre moving into former retail units. In addition a new yoga space has been created within a former retail unit as has a new gaming centre and spy mission. There have not been any other significant changes with the level of retail remaining stable in all other zones. It is however worth noting that the percentage of retail has actually increased within two of the seven zones (PR01: Back of the Inns/Castle Street area and PR02: The Lanes east).
66. This would suggest that Castle Quarter is continuing to see changes away from retail to service and leisure uses. Back in 2018 only 38.3m (4.4%) of the frontage was non-retail but this increased to 129.9m in October 2019. It has now increased to 246.1m (27.4%) which means that over a quarter of the frontage is now non retail. The other retail frontage zones however have not experienced this move away from retail.
67. Overall, whilst the percentage of A1 retail frontage within one of the primary retail area core frontage zones has declined, in other areas it has increased and with the exception of Castle Quarter retail frontages still remain at relatively comfortable levels above their minimum thresholds.

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

Primary retail area core frontage zones

Frontage zone	Total frontage (m)	Total non-retail frontage Oct 2022	% A1 retail Oct 2022 (frontage)	% A1 retail March 2022 (frontage)	Minimum threshold (from 2014 SPD)
PC01: Gentleman's Walk/ Haymarket/Brigg Street	856.4	108.8	87.3%	87.3%	80%
PC02: Castle Mall (Levels 1 & 2)	898.1	246.1	72.6%	83.8%	80%
PC03: Chapelfield, upper & lower Merchants Hall and St Stephens Arcade	641.0	27.0	95.8%	95.8%	80%

Frontage zones in the rest of the primary retail area

Frontage zone	Total frontage(m)	Total non-retail frontage Oct 2022	% A1 retail Oct 2022 (frontage)	% A1 retail March 2022 (frontage)	Minimum threshold (from 2014 SPD)
PR01: Back of the Inns/Castle Street area	666.8	191.2	71.3%	70.2%	65%
PR02: The Lanes east (Bedford Street/Bridewell Alley)	1116.3	305.8	72.6%	71.5%	70%
PR03: St Stephens Street/Westlegate	821.5	114.9	86.0%	86.0%	80%
PR04: Castle Meadow north		N/A ¹²			
PR05: Chapelfield Plain		N/A ¹³			
PR06: Timberhill/Red Lion Street	434.2	151.35	65.1%	65.1%	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.

¹² There is no defined frontage in this zone

¹³ There is no defined frontage in this zone

The Secondary Area: Retail Vacancy

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since March 22)
Secondary area (Retail only)	23.3%	23.3%	10.7%	1.8% decrease

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

69. The vacant available *floorspace* rate experienced a significant increase between 2016 and 2018 when it rose from 2.8% to 17.2%. Between 2018 and 2021 it rose further to 23.1% and over the past 12 months it has remained relatively stable at around 23.3%.

70. The percentage of vacant retail *units* in the Secondary Area also increased between 2016 and 2018 with a rise from 7.0% to 7.7%. This has now increased to 10.7%.

71. The overall amount of floorspace in A1 retail use has decreased since the last full report in 2021 (by 416m²) and there has also been a reduction in units in the Secondary Shopping area from 183 in 2021 to 178 in 2022.

72. 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 3,222m² and the closure of a further unit at the Retail Park which has a floorspace of 632m². 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 6.5% 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 whilst they have crept up to be just over 10% this is very competitive when compared to the GB national average retail vacancy rate of 15.4%¹⁴.

73. 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 remained resilient during the pandemic.

74. 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 (restaurants, bars and fast food). Independents are also likely to have benefited from government support measures and business rates relief

¹⁴ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

which has enabled them to remain operational.

Table 6: Secondary area

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	21,443	16,454	4,989	0
March 2022	21,826	16,752	5,074	0
July 2021	21,859	16,775	5,060	24
October 2020	21,933	17,180	4,753*	0
October 2019	21,611	17,651	3,960	0
June 2018	21,772	17,921	3,741	110
June 2016	21,858	21,243	615	0
Sept 2015	21,793	21,148	594	51
April 2014	21,958	21,569	273	116
August 2013	21,926	21,083	715	131
January 2011	17,785	16,612	878	295
July 2010	17,980	16,709	1,107	164
January 2010	18,076	16,788	1,189	99
July 2009	18,262	17,008	1,207	47
July 2008	18,167	17,604	1,022	81

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	178	159	19	0
March 2022	179	163	16	0
July 2021	183	165	17	1
October 2020	185	169	16**	0
October 2019	181	167	14	0
June 2018	182	168	12	2
June 2016	185	172	13	0
Sept 2015	184	173	10	1
April 2014	185	177	5	3
August 2013	187	176	9	2
January 2011	190	174	13	3
July 2010	192	173	16	3
January 2010	194	173	18	3
July 2009	196	173	22	1
July 2008	194	176	15	3

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i>Vacant+Refurbishment</i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i>Vacant</i> <i>All</i>	As a proportion of all retail units <i>Vacant+Refurbishment</i> <i>All</i>
October 2022	23.3%	23.3%	10.7%
March 2022	23.2%	23.2%	8.9%
July 2021	23.3%	23.1%	9.8%
October 2020	21.7%	21.7%	8.6%
October 2019	18.3%	18.3%	7.7%
June 2018	17.7%	17.2%	7.7%
June 2016	2.8%	2.8%	7.0%
Sept 2015	3.0%	2.7%	6.0%
April 2014	1.8%	1.2%	4.3%
August 2013	3.9%	3.3%	5.9%
January 2011	6.6%	4.9%	6.8%
January 2010	7.1%	6.6%	9.3%
July 2008	5.6%	5.7%	7.7%

* 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

75. Policy DM20 divides the secondary area into a number of smaller 'frontage zones' (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 3. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).

76. Table 7 provides data on the percentage of retail uses in the secondary area retail frontage zones 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 SPD. During the monitoring period the proportion of retail has reduced slightly within two of the frontage zones (SR01: The Lanes West (Pottergate/Dove Street/Lower Goat Lane) and SR03: St Benedicts). Notwithstanding this, overall the retail frontages still appear relatively healthy and overall retail frontages remain at relatively comfortable levels above their minimum thresholds.

77. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 20.0% (compared to retail only of 23.3%) and the percentage of vacant units is 11.% (compared to retail only of 10.7%). Vacancy rates have fallen since July 2021 for all town centre uses.

Table 7: Secondary area retail frontage zones

Frontage zone	Total frontage (m)	Total non-retail frontage March 2022	% A1 retail October 2022 (frontage)	% A1 retail March 2022 (frontage)	Minimum threshold (from 2014 SPD)
Primary retail area core frontage zones					
SR01	391.3	94.5	75.8%	76.1%	70%
SR02	121.7	39.4	67.6%	67.6%	60%
SR03	638.0	271.1	57.5%	58.1%	60%
SR04	No defined frontage				
SR05	No defined frontage				
SR06	No defined frontage				

Large District Centres

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change (since March 22)
Large District Centres (Retail only)	5.6%	5.6%	12.1%	0.9% decrease

78. 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.

79. The vacant available floorspace in the LDCs is currently 5.6% which is significantly lower than in 2021 when 9.1% of floorspace was vacant but is still higher than it was in 2019 when only 3.3% of available floorspace was unoccupied. It is however still very low compared to both the city and national average and regarded as a low figure for a shopping area which does not form a central part of the city's retail offer.

80. The percentage of vacant retail *units* in the LDCs has increased since 2021 (from 10.9% to 12.1%) but has decreased since the last survey was carried out in March 2022 when 12.7% of shops sat empty. 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.

81. In terms of Riverside the closure of Mothercare, Outfit and Carphone Warehouse in 2020/21 left three units empty which at 593m², 1,530 m² and 196 m² respectively 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. Outfit has since been occupied by B&M Bargains which has expanded so it now occupies two units and this has resulted in the vacancy rate falling significantly to only 4.9% (and 8.5% for units). Riverside has largely been a car based destination but it is hoped that the routes established within the 'St Anne's Quarter' development will create a more attractive walking and cycling link between Riverside and the city centre.

82. The Magdalen Street, Anglia Square & St Augustine's LDC on the other hand had a relatively low floorspace vacancy rate of 7.0% in June 2021 and 10.8% for units. This has not changed significantly over the last year with the floorspace vacancy figure now being 6.3%. The number of vacant units has increased slightly to 12.1%. This is still competitive when compared to the GB national average retail vacancy rate of 15.4%¹⁵. This centre has repositioned itself as a niche area of speciality/ethnic retailers and restaurants. The relatively 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 (restaurants, bars and fast food).

¹⁵ Local Data Company, "H1 2022 retail and leisure trends analysis" (September 2022)

83. 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, a new application is now pending consideration. If permission is granted, this area may be subject to significant levels of change and regeneration over the coming years.

84. The overall amount of floorspace in A1 retail use has remained stable since Riverside was included as part of the Large District Centre in August 2013.

85. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 8.0% (compared to retail only of 5.6%) and the percentage of vacant units is 14.0% (compared to retail only of 12.1%).

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

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	32,385	30,561	1,824	0
March 2022	32,695	29,623	3,051	21
July 2021	32,379	29,426	2,932	21
October 2020	32,015	29,974	2,041*	0
October 2019	32,164	31,043	1,071	50
June 2018	32,609	30,421	1,748	440
June 2016	32,353	30,534	1,750	69
Sept 2015	32,353	31,237	1,047	69
April 2014	32,647	31,594	784	269
August 2013	32,602	31,256	301	1,045
January 2011	18,314	14,934	3,311	69
July 2010	18,218	14,947	3,202	69
January 2010	18,239	14,811	3,359	69
July 2009	18,289	15,049	3,031	209
July 2008	18,139	15,017	3,031	91

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	141	124	17	0
March 2022	142	124	18	1
July 2021	138	123	14	1
October 2020	138	120	18**	0
October 2019	137	123	13	1
June 2018	140	124	14	2
June 2016	139	125	13	1
Sept 2015	139	129	9	1
April 2014	140	130	8	2
August 2013	77	67	7	3
January 2011	135	107	27	1
July 2010	134	109	24	1
January 2010	135	106	28	1
July 2009	136	112	22	2
July 2008	135	111	22	2

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2022	5.6%	5.6%	12.1%
March 2022	9.4%	9.3%	12.7%
July 2021	9.1%	9.1%	10.9%
October 2020	6.4%	6.4%	13.0%
October 2019	3.5%	3.3%	10.2%
June 2018	6.7%	5.4%	11.4%
June 2016	5.6%	5.4%	10.0%
Sept 2015	3.4%	3.2%	7.2%
April 2014	3.2%	2.4%	7.1%
August 2013	4.1%	1.0%	13%
January 2011	18.5%	18.1%	20.0%
July 2010	18.0%	17.6%	17.9%
January 2010	18.8%	18.4%	20.7%
July 2009	17.7%	16.6%	16.2%
July 2008	16.7%	16.8%	16.0%

* 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 refurbishments)	Vacant units	Retail floorspace change (since March 22)
Rest of City Centre (Retail only)	12.2%	10.0%	15.8%	10.3% decrease

86. 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.
87. The vacant available *floorspace* in the rest of the city centre increased significantly from 5.9% in 2019 to 13.7% in 2021 and reached 15.4% in March 2022. When including refurbishments the vacancy rate in 2021 reached a high of 19.2%. However since the last survey was carried out in March 2022, a number of vacant units have since been occupied with vacant available floorspace now being only 10.0% and when including refurbishments is now 12.2%. This is around 2% lower than the city centre averages.
88. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%; however in October 2019 the rate was exceptionally low at only 5.9% which was a bit of an anomaly. Increased vacancies during 2020 and 2021 suggested that a number of new businesses struggled to survive during the pandemic but it is encouraging to see vacancy rates return to relatively low levels which suggests that the rest of the city centre is actually performing quite well in terms of retail floorspace.
89. The percentage of vacant retail *units* in the rest of the city centre has also fallen from 25 units (19.4%) in July 2021 to 19 units (15.8%) in October 2022. A higher vacancy rate for units compared to floorspace would suggest that some of the smaller units remain vacant.
90. The overall amount of floorspace in A1 retail use has decreased significantly within the monitoring period and has fallen by 10.3% (with the number of units reducing by 4).
91. The statistics from the past few years suggest that there has been a lot of change and turnover in the 'rest of the city centre' area which is expected within the more peripheral city centre shopping streets. Although a number of businesses closed over the pandemic, the 'rest of the city centre' seems to be bouncing back in a similar way to some of the more central shopping areas. The loss in retail floorspace however would suggest that there has been quite a bit of diversification with a number of retail units changing to other town centre uses.
92. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 19.3% (compared to retail only of 12.2%) and the percentage of vacant units is 14.1% (compared to retail only of 15.8%). These are significant decreases from 2021 where 22.0% of all town centre floorspace was vacant and 18.1% of all town centre units were empty.

Table 9: Rest of city centre**Retail floorspace (use class A1)**

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	10,410	9,142	1,038	230
March 2022	11,607	9,544	1,788	275
July 2021	13,503	10,912	1,852	739
October 2020	13,503	11,080	2,423	0
October 2019	13,670	12,792	813	65
June 2018	13,834	11,769	1,658	407
June 2016	14,387	12,629	1,758	0
Sept 2015	14,475	12,711	1,676	88
April 2014	14,164	11,430	2,591	143
August 2013	17,084	14,738	920	1,426
January 2011	17,400	14,495	2,880	25
July 2010	17,500	13,524	3,559	417
January 2010	17,593	14,240	3,353	0
July 2009	17,702	13,655	4,047	0
July 2008	17,786	13,310	3,761	765

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2022	120	101	16	3
March 2022	124	101	22	1
July 2021	129	104	23	2
October 2020	129	104	25	0
October 2019	130	118	11	1
June 2018	135	110	23	2
June 2016	137	125	12	0
Sept 2015	138	125	12	1
April 2014	144	124	19	1
August 2013	157	137	12	8
January 2011	168	144	23	1
July 2010	192	167	23	2
January 2010	172	145	27	0
July 2009	173	146	27	0
July 2008	171	143	26	2

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>
October 2022	12.2%	10.0%	15.8%
March 2022	17.8%	15.4%	18.5%
July 2021	19.2%	13.7%	19.4%
October 2020	17.9%	17.9%	19.4%
October 2019	6.4%	5.9%	9.2%
June 2018	15%	12%	18.5%
June 2016	12.2%	12.2%	8.8%
Sept 2015	12.2%	11.6%	9.4%
April 2014	19.3%	18.3%	13.9%
August 2013	13.7%	5.4%	12.7%
January 2011	16.7%	16.6%	13.7%
July 2010	22.7%	20.3%	12.0%
January 2010	19.1%	19.1%	15.7%
July 2009	22.9%	22.9%	15.6%
July 2008	21.1%	22%	15.2%

* 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

93. Policy DM21 of the Development management policies plan establishes A1 retail use thresholds of 60% for District Centres and 50% for Local Centres.
94. Vacancy rates in District and Local Centres focus on units only and have reduced significantly overall from 11.6% in 2021 to 6.5% in 2022. This follows the trend of decreasing vacancy rates within the city; however 6.5% is nearly half that of the 12.6% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances Local and District Centres are faring extremely well. During the pandemic more people started to shop locally and this seems to be continuing.
95. Overall these figures would suggest that District and Local Centres are continuing to perform their function and to offer an appropriate range of local services and facilities and over the past 12 months or so Norwich's District and Local Centres have gone from strength to strength.

District Centres

Headline figures	Vacant units	Number of units change
District Centres	5.6%	2.0% increase

96. Vacancy rates in the District Centres have reduced significantly from 9.8% in 2021 to 5.6% in 2022. This is significantly lower than the city centre and also significantly lower than pre pandemic times where 11.6% of units within District Centre stood vacant in 2018. The total number of vacant units in the 10 District Centres is currently only 11 which compares to 19 in 2021 and 23 in 2018.
97. In term of total number of units, there has been an increase in two District Centres – DC05: Aylsham Road/Mile Cross and DC06: Earlham House which is a result of units subdividing. There has not been a reduction in units in any of the District centres.
98. The percentage of non-retail units currently stands at 43.4% which is 1.6% higher than in 2021. The increase in non-retail units continues the trend experienced since 2019. There has been an increase in non retail in five District Centres: DC03 Eaton Centre, DC05 Aylsham Road/Mile Cross, DC06 Earlham House, DC07 The Larkman and DC08 Dereham Road/Distillery Square. DC03, DC05, DC07 and DC08 already exceed the 40% non-retail threshold and DC06 Earlham Road despite increasing the percentage of non retail still sits comfortably under the threshold at 29.4%. However it is important to note that despite the overall percentage of non retail increasing, within two District Centres (DC01 Bowthorpe and DC10 Sprowston Road/Shipfield) the percentage of non-retail has actually decreased which means that the 40% non-retail threshold set out in Development Management Policy DM21 is no longer exceeded. In Bowthorpe the percentage of non retail was 47.1% in 2021 but now sits at 35.3% and in Sprowston Road/Shipfield the percentage of non retail was 42.1% in 2021 and is now 36.8%. Therefore the number of District Centres which fall within the threshold has increased from two to four which along with Bowthorpe and Sprowston Road/Shipfield also includes DC02: Drayton Road

and DC06: Earlham House where the percentage of non retail are 26.7% and 29.4% respectively. The District Centres which exceed the 40% non-retail threshold set out in Development management policy DM21 are now as follows:

- DC03: Eaton Centre
- DC04: Plumstead Road
- DC05: Aylsham Road/Mile Cross
- DC07: The Larkman
- DC08: Dereham Road/Distillery Square
- DC09: Hall Road

99. A few of these centres have non-retail percentages not too much above 40% and as shown at Bowthorpe and Sprowston Road/Shipfield it only takes one or two units changing to retail to satisfy the policy ambition. However, applications locally and patterns nationally over recent years have shown that things are generally 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 last 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. This monitoring year has not shown any significant impacts as a result of changes to the Use Classes Order and Permitted Development Order; however it may not be until next monitoring year that the true impact of this starts to show. In terms of the pandemic, currently it would appear that this has actually had a positive impact on our District Centres with more people shopping locally; however it will be interesting to see what changes occur within the District Centres over the next monitoring period as a result of other economic factors such as the cost of living crisis.

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

101. There has been no change to the vacancy rate within Bowthorpe district centre DC01 during this monitoring period with 11.8% of units currently being unoccupied (two units). The percentage of non retail units has reduced below the 40% threshold. Whilst no changes actually took place this year, the fall in non retail units has been a correction to changes in the use class that took place during a previous monitoring period.

102. In 2019 Drayton Road district centre DC02 had the highest vacancy rate with 20% of units being unoccupied. This decreased to 13.3% in 2021 and has now decreased further to 6.7% (1 unit) in 2022. The non-retail percentage rate has not changed and is only 26.7% which is well clear of the 40% recommended maximum guideline.

103. Vacancies in DC03: Eaton Centre have reduced from three units in 2021 to two units in 2022 with the vacancy rate now being 11.8%. Whilst there has been a reduction this is still joint highest of all District Centres. The number of non-retail units has increased from nine to ten and with 52.9% of all units being non-retail this is the second highest of all District Centres.

104. There has been no change in terms of vacancy rate or percentage of non retail within DC04: Plumstead Road. Whilst the previous monitoring report suggested that this centre was performing well, it now has the third highest vacancy rate of all district centres.
105. DC05: Aylsham Road/Mile Cross has seen a significant fall in vacancies from 14.3% (three units) to only 4.5% (one unit). There has been an increase of one unit which is a new takeaway. A new Lidl opened adjacent to the District Centre several years ago which is just outside of the District Centre boundary (so not counted as a unit within this monitoring report). This appears to have strengthen the centre.
106. 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. It now only has one vacancy and has the highest proportion of retail units of all District centres although there has been an increase in the non-retail percentage during this monitoring period from 20% to 29.4%.
107. There are three district centres which have all of their units occupied which are The Larkman (DC07), Dereham Road/Distillery Square (DC08) and Hall Road (DC09) centres. In 2021 Dereham Road/Distillery Square had four vacant units so this centre has seen significant change over the past year. All three of these fully occupied District Centres have over 40% non-retail.
108. There has been no change in vacancy rates or the percentage of non retail within Sprowston Road/Shipfield (DC10). This centre only has one vacant unit and 36.8% non retail.

Table 10: District Centres defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
DC01	Bowthorpe	17	2	11.8%		6	35.3%	
DC02	Drayton Road	15	1	6.7%		4	26.7%	
DC03	Eaton Centre	17	2	11.8%		10	58.8%	
DC04	Plumstead Road	32	3	9.4%		14	43.8%	
DC05	Aylsham Road/ Mile Cross	22	1	4.5%		11	50.0%	
DC06	Earlham House	17	1	5.9%		5	29.4%	
DC07	The Larkman	14	0	0.0%		7	50.0%	
DC08	Dereham Road/ Distillery Square	37	0	0.0%		18	48.6%	
DC09	Hall Road	7	0	0.0%		4	57.1%	
DC10	Sprowston Road/ Shipfield	19	1	5.3%		7	36.8%	
TOTAL		197	11	5.6%		86	43.4%	

Key

Vacancy rate is **unchanged** since last survey

Vacancy rate is **up** since last survey

Vacancy rate is **down** since last survey

Proportion of A1 retail units is **ABOVE** 60% policy

Proportion of A1 retail units is **BELOW** 60% policy



Local centres

Headline figures	Vacant units	No of units change
Local Centres	7.1%	0.3% increase

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

110. Of the 325 units, the number of vacant units is 23, representing a reduced vacancy rate of 7.1% in 2022 compared to the 2021 figure of 12.7%. Interestingly the percentage has now returned to exactly the same as it was in 2019. This is also significantly lower than the city centre. Half of all local centres (14 out of 28) are now fully occupied which compared to 10 in 2021). There has also been an increase of 1 no. unit since 2021.

111. Improvements in vacancies since 2021 have taken place in 13 local centres which are LC01 Hall Road/Trafalgar Street, LC02 Hall Road/Queens Road, LC04 Grove Road, LC06 Suffolk Square, LC14 Magdalen Road, LC18 Earlham West Centre, LC19 Colman Road/The Avenues, LC24 Witard Road, LC25 Clancy Road, Heartsease, LC26 UEA and LC30 St Stephens Road. The local centres which have had increased vacancies during the monitoring period are LC07 St Augustine's Gate, LC20 Colman Road, The Parade and LC28 Magdalen Road/Clarke Road. There is less of a disparity in vacancy rates than in 2021. Back in 2021 LC01 for example had a vacancy rate of 42.9% whilst other Local Centres were fully occupied. Now the worst performing local centre is LC07 with only a quarter of units being empty.

112. The percentage of non-retail units across all of the centres is 50.8% up from 46.0% in 2021. Whilst there has been an increase in the percentage of non retail, this average figure remains below the 50% threshold. 14 of the 28 centres have a proportion of A1 retail units above the 50% policy target and are policy compliant, two sit at the recommended 50% threshold and twelve are below the threshold and are not policy compliant. The twelve local centres that have exceeded the DM21 policy threshold and have greater than 50% non-retail uses are listed below. The five centres that have been added to this list since 2021 are LC11, LC14, LC17, LC18 and LC28. LC12 (Woodcock Road) and LC20 (Colman Road, The Parade) on the other hand have increased the proportion of retail so have now been removed from this list.

- LC02: Hall Road/Queens Road
- LC06: Unthank Road;
- LC07: St Augustine's Gate;
- LC10: Aylsham Road/Glenmore Gardens
- LC11: Aylsham Road/Glenmore Gardens
- LC14: Magdalen Road
- LC15: Sprowston Road/Silver Road
- LC17: Bishop Bridge Road

- LC18: Earlham West Centre
- LC26: UEA; and
- LC28: Magdalen Road/Clarke Road
- LC29: Aylsham Road/Copenhagen Way.

113. 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:

- LC09: Aylsham Road/Junction Road
- LC20: Colman Road, The Parade

Table 11: Local Centres¹⁶ defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC01	Hall Road/ Trafalgar St	7	0	0.0%		1	14.3%	
LC02	Hall Road/ Queens Road	29	5	17.2%		19	65.5%	
LC03	Hall Road/ Southwell Road	7	0	0.0%		3	42.9%	
LC04	Grove Road	14	0	0.0%		6	42.8%	
LC05	Suffolk Square	9	0	0.0%		4	44.4%	
LC06	Unthank Road	43	0	0.0%		23	53.5%	
LC07	St Augustine's Gate	8	2	25.0%		6	75.0%	
LC08	See footnote							
LC09	Aylsham Road/ Junction Road	8	1	12.5%		4	50.0%	
LC10	Aylsham Road/ Glenmore Gardens	13	1	7.7%		7	53.8%	
LC11	Aylsham Road/ Boundary Road	12	1	8.3%		8	66.7%	
LC12	Woodcock Road	7	0	0.0%		2	28.6%	
LC13	Catton Grove Road/Ring Road	12	2	16.7%		4	33.3%	

¹⁶ Local centres at **Dereham Road/Distillery Square** (previously LC08) and **Sprowston Road/Shipfield** (previously LC16) were redesignated as district centres following the development of new anchor foodstores and renumbered as DC08 and DC10 respectively in the 2014 local plan. 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.

LC14	Magdalen Road	15	1	6.7%		8	53.3%	
LC15	Sprowston Road/ Silver Road	8	0	0.0%		5	62.5%	
LC16	See footnote							
LC17	Bishop Bridge Road	8	0	0.0%		6	75.0%	
LC18	Earlham West Centre	22	2	9.0%		12	54.5%	
LC19	Colman Road/ The Avenues	16	3	18.8%		5	31.3%	
LC20	Colman Road, The Parade	10	1	10.0%		5	50.0%	
LC21	Woodgrove Parade	9	0	0.0%		2	22.2%	
LC22	St John's Close/ Hall Road	11	0	0.0%		5	45.5%	
LC23	Tuckswood centre	5	0	0.0%		1	20.0%	
LC24	Witard Road, Heartsease	9	0	0.0%		2	22.2%	
LC25	Clancy Road, Heartsease	5	0	0.0%		2	40.0%	
LC26	UEA	9	1	11.1%		7	77.8%	
LC27	Long John Hill	5	0	0.0%		2	40.0%	
LC28	Magdalen Road/ Clarke Road	8	1	12.5%		5	62.5%	
LC29	Aylsham Road/ Copenhagen Way	5	1	20.0%		5	100%	
LC30	St Stephens Road	11	1	9.1%		6	54.5%	
TOTAL		325	23	7.1%		165	50.8%	

Key

Vacancy rate is **unchanged** since last survey

Vacancy rate is **up** since last survey

Vacancy rate is **down** since last survey



Proportion of A1 retail units is **ABOVE** 50% policy target

Proportion of A1 retail units is **BELOW** 50% policy target

Proportion of A1 retail units is **AT** 50% policy target



Conclusions

114. Retail vacancy rates have reduced quite significantly since July 2021 and as shown in table 12 rates have decreased in all city centre areas except the secondary retail area where they have increased very slightly. Vacancy rates have also fallen within the District and Local Centres. High vacancy rates in July 2021 were unsurprising given the challenging circumstances faced by retailers during the pandemic and given that footfall had been so low for much of 2020 and 2021 with people working from home and choosing to either shop locally or turning to online retailing and it is encouraging to see how well Norwich has recovered and bounced back from this very difficult period.
115. It was quite uncertain whether shops would be able to survive the impact of the pandemic particular once business rates relief and other government support came to an end but within Norwich not only have the majority been able to survive but several new multiples and independents have also opened within the past 12 months or so.
116. Norwich's independent retailers have continued to be very resilient and have performed well and this can be shown by the low vacancy rates within both the secondary retail area (when excluding vacant units within the Cathedral Retail Park) and the Magdalen Street, Anglia Square & St Augustine's LDC where vacancy rates are only 6.5% and 5.6% respectively which is extremely low when compared to a national average retail vacancy rate of 15.4%. However one question often posed about the independent market is that of long-term sustainability. Many of these units have shorter average length of occupancy and a higher rate of churn across the market, due to a lack of infrastructure and financial backing so it will be interesting to see how these areas perform in the coming years, particularly as retailers facing increasing costs and consumers face a cost of living crisis.
117. This monitoring report now also looks at all town centre use vacancy rates as well as retail. Nationally leisure vacancy rates are lower than retail and whilst it is difficult to compare due to different methodologies of collecting and analysing data, the overall vacancy rate for the city centre does increase when other town centre uses are taken into account.
118. In terms of the total amount of retail floorspace within the city centre, it is continuing to decrease at quite significant rates. Within this monitoring period nearly 6,000sqm of retail floorspace was lost which is a 2.9% decrease. This now means that since 2008 Norwich city centre has lost around 8.3% of its retail provision. The retail however is generally not being lost to residential or being demolished; instead the city is experiencing diversification and with the floorspace generally changing to other town centre uses. Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that 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.
119. This trend of diversification can particularly be seen within Castle Quarter and during this monitoring period for the first time one of the retail frontages in the Primary area is no longer within the recommended minimum percentage of A1

use as set out in the 'Main Town Centre Uses and Retail Frontages' Supplementary Planning Document (2014). Other than the Castle Quarter frontage they all remain stable and comfortably within the recommended minimum percentage of A1 uses with the percentage of retail actually increasing in two of the zones. In terms of the secondary area retail frontage zones one out of three (SR03: St Benedicts) is below the minimum threshold and during the monitoring period the proportion of retail reduced slightly within two of the frontage zones although it would still appear that overall the retail frontages appear relatively healthy.

120. Vacancy rates in District and Local Centres have also decreased from 11.6% in 2021 to 6.5% in 2022. This follows the trend of decreasing vacancy rates within the city; however it is significantly lower than the 12.6% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances local and district centres are faring extremely well. The July 2021 report suggested that more people were shopping locally and it would appear that this may still be case, despite less people now working from home.
121. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and as a result of the pandemic. Whilst it is likely that these challenges will have ongoing impacts for the viability of some retail businesses, the past 12 months have shown just how resilient the majority of our businesses are (especially Norwich's independent businesses) and how successfully they have managed to recover. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving.
122. It is also encouraging how footfall has significantly increased and has now returned to pre pandemic levels. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around and enjoy their time within the city.
123. It is however important to acknowledge that Norwich, as with all cities, faces an extremely uncertain time ahead. Whilst Norwich has largely recovered from the impacts of the pandemic, rising costs, inflations and interest rates will impact both retailers and consumers. The Local Data Company predicts that vacancy rates will continue their downward trajectory with the national vacancy rate reaching 13.7% in 2023. This seems very optimistic and with the challenges ahead, some shops and business will inevitable struggle and look to close stores so it would not be a surprise if vacancy rates do start to creep up again.
124. It is also important to acknowledge that there are many changes that can now take place within retail centres without the direction of the council which include the change of use to other town centre uses but also the change of use to residential without the need for full planning permission. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified several risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned that extending the use of permitted development rights to change to

residential could be hugely detrimental to this. Without being able to consider the impact that the loss of town centres uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses at ground floor level which will result in residential interspersed with town centre uses. This will not only affect the way that our high streets function but it could reduce rather than increase footfall. For this reason the Council has concern that the uncontrolled and piecemeal loss of town centre uses could be a threat to the vitality and vibrancy of our high street and it is going to be very important to continue to monitor change over the coming few years.

125. Notwithstanding the above, given the circumstances Norwich has demonstrated that it remains robust and is a thriving retail centre in the East of England with vacancy rates being down and footfall being up. To continue this success, the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced ahead, including working closely with Norwich BID and other key stakeholders.

Table 12: 'At a Glance' The direction of travel of vacancy rates and retail floorspace in Norwich since March 2022

Area	Available vacant floor space	All vacant floor space including refurbishment	Number of vacant Units	Overall Floor Area	Overall units
City Centre	↓	↓	↓	↓	↓
Primary Area	↓	↓	↓	↓	↓
Secondary Area	↑	↑	↑	↓	↓
Large District Centres	↓	↓	↓	↓	↓
Rest of city centre	↓	↓	↓	↓	↓
District Centres	N/A	N/A	↓	N/A	↑
Local Centres	N/A	N/A	↓	N/A	↑

Key

↑ = increase

↓ = decrease

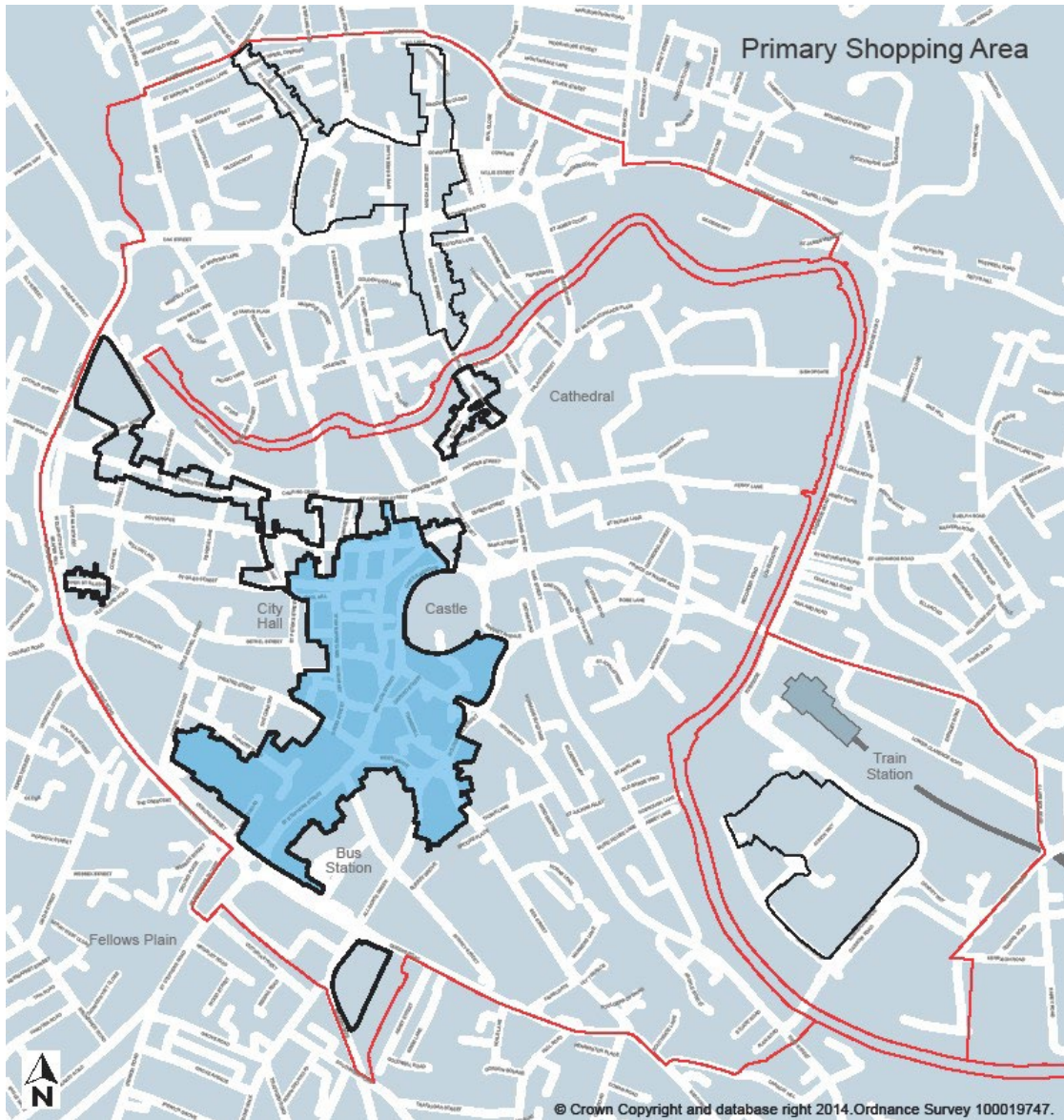
Red = Moving in a negative direction

Green = Moving in a positive direction

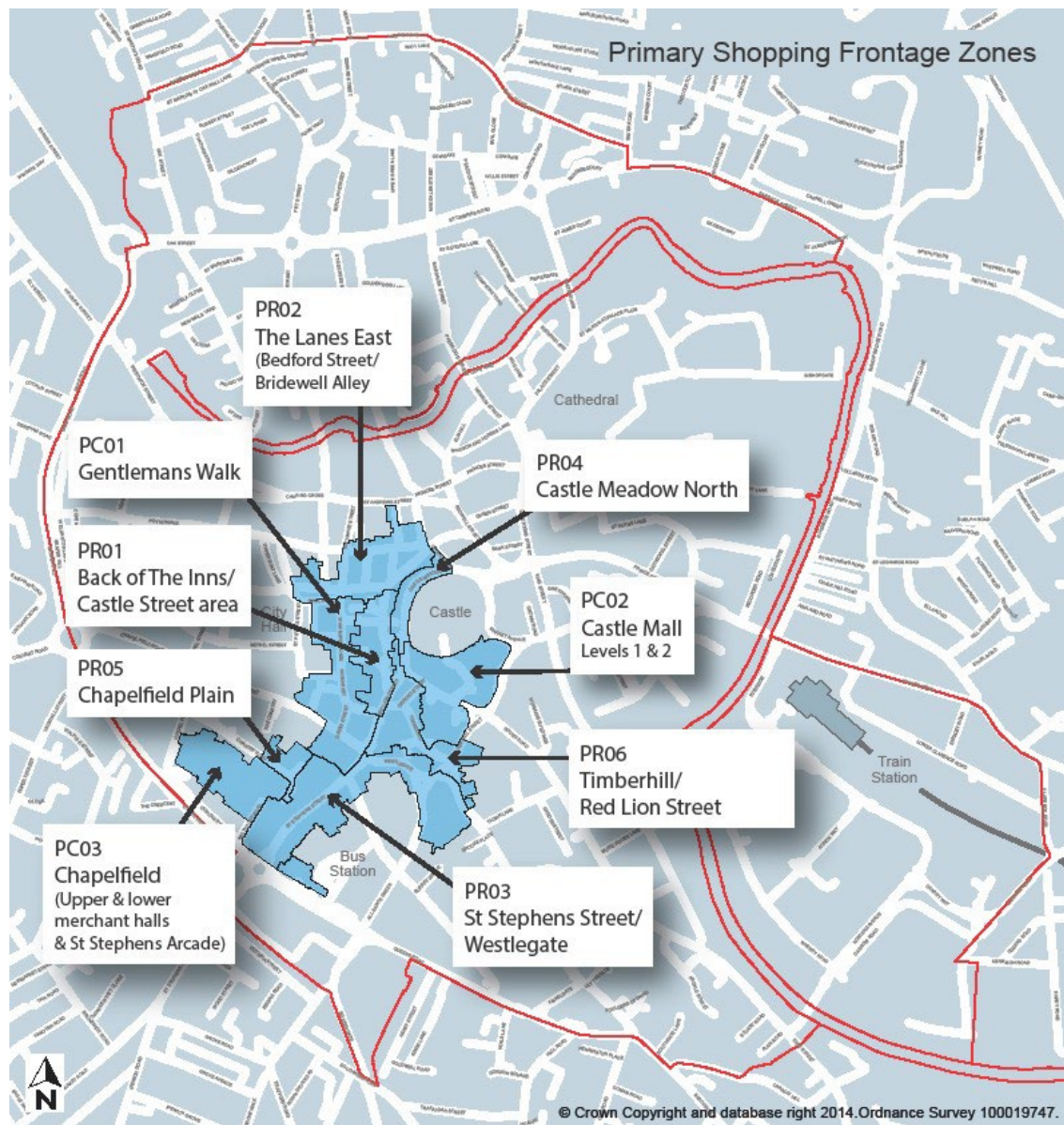
Grey = No change

Supporting Maps

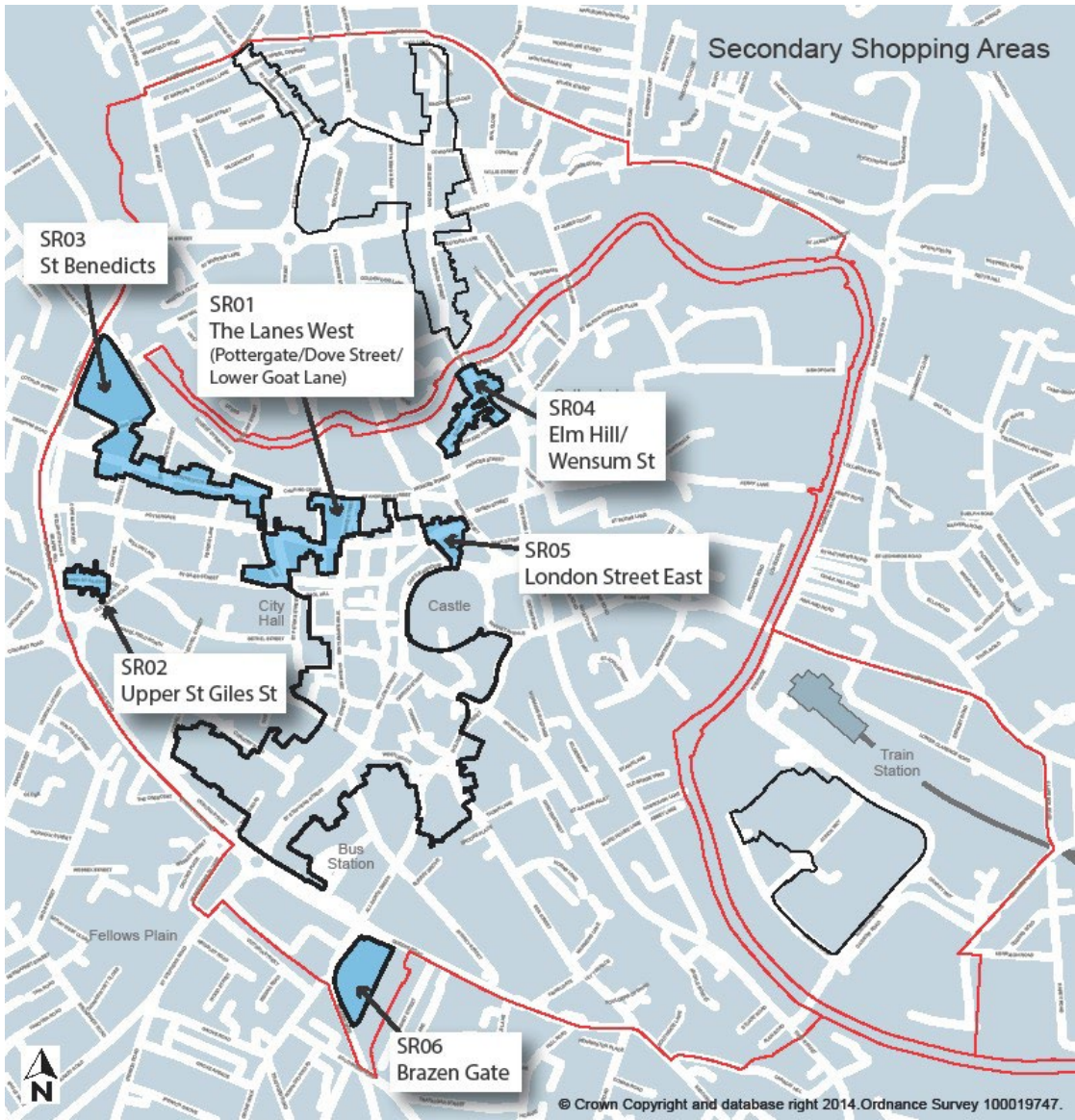
Map 1: Primary shopping area



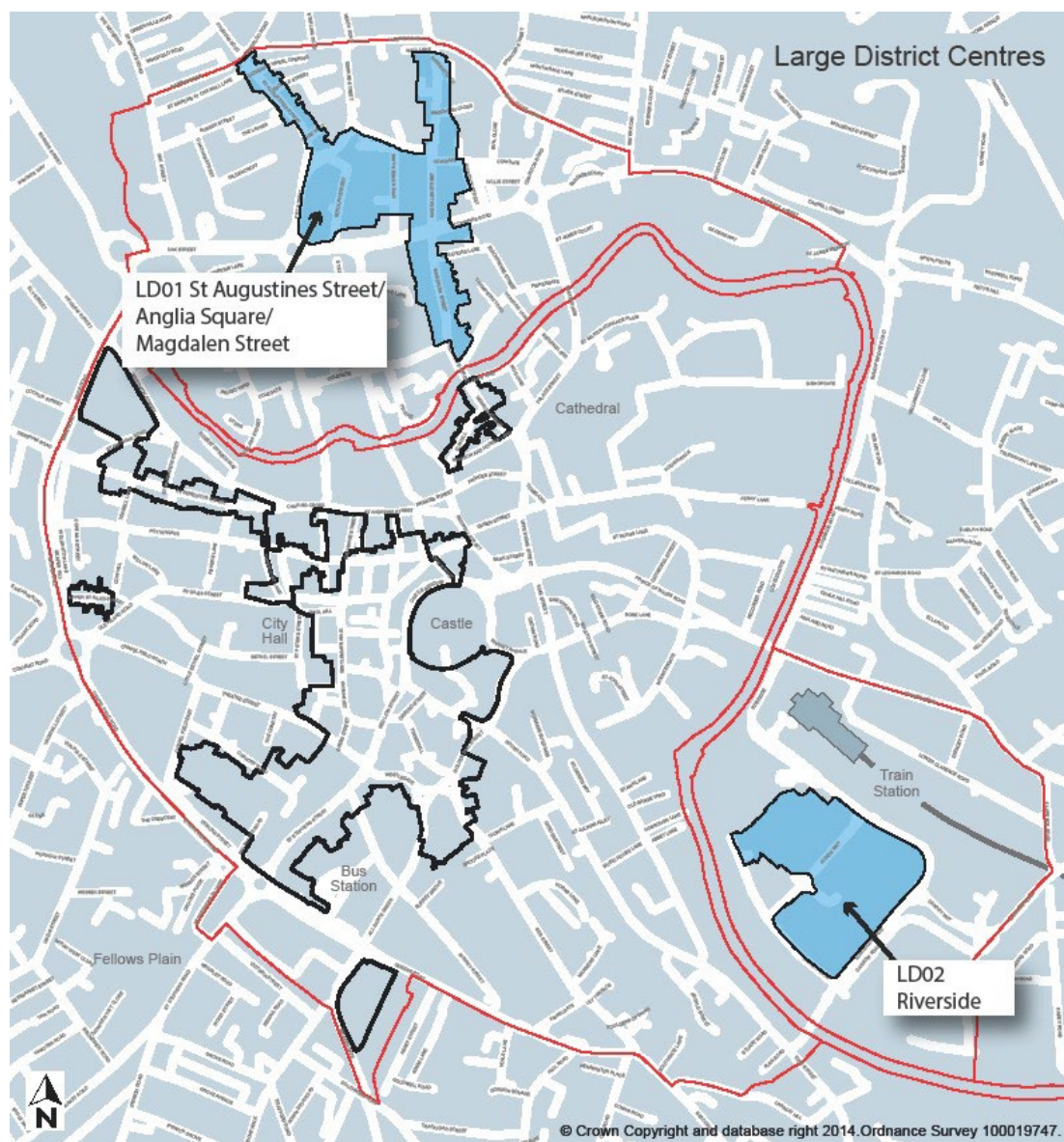
Map 2: Primary area frontage zones



Map 3: Secondary shopping areas



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



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